

Interested Party Representation (Form IPR1)



Section 1 – Licence application details

Please indicate as appropriate :

- I wish to object to the following application:
 I wish to support the following application:

Applicant premises name and address: **Graudo Foods, Office G2, 480 Harehills Lane, Leeds, LS9 6NG**

Section 2 – Your personal details

NB: If you are acting as a representative, please go to Section 3.

Title Mr Mrs Miss Other _____

Surname **Patel**

First name(s) **Chetna**

Address (incl postcode):

Leeds City Council, Public Health (Localities and Primary Care Team), 5th Floor West, 110 Merrion House, Leeds, LS2 8BB

Please note that a full copy of your representation (including your name and address) will be sent to the applicant and will be a public document at any hearing of this matter.

Please refer to our Guidance Note – GN-M Guidance on making representations for further information and alternative options.

Section 3 – Representative details

If you are representing someone else, please complete details below

Name of Representative/
Organisation **N/A**

Full postal address
(incl postcode) **N/A**

Please indicate capacity:

- Representative of Residents Association
 MP
specify) _____
- Ward Councillor
 Trade Association
- Parish Council
 Other (please

Section 4 – Representation grounds		
<p>The representation is relevant to one or more of the following licensing objectives:</p>	<p>Prevention of crime and disorder Prevention of public nuisance Protection of children from harm Public safety</p>	<p>X <input type="checkbox"/> X <input type="checkbox"/> X <input type="checkbox"/> X <input type="checkbox"/></p>
<p>Please tick relevant box(es)</p>		
<p>Please select:</p>		
<p><input type="checkbox"/> I object to the application being granted at all</p>		
<p><input type="checkbox"/> I object to the application being granted in its current form*</p>		
<p>*If you choose this option, remember to tell us in the next section what changes you would prefer to see.</p>		
<p>The grounds of the representation is based on the following:</p>		
<p>I would like to make a public health objection to the application of Graudo Foods, Office G2, 480 Harehills Lane, Leeds, LS9 6NG</p>		
<p>Regarding the above application, I would like to bring to your attention the negative impact granting a new off licence premise selling alcohol would have on the local community. There are concerns regarding the potential harm to children, crime and disorder and public safety.</p>		
<p>I would like to strongly object to this license on the following grounds. After two years of the coronavirus pandemic, levels of alcohol consumption and alcohol harms have increased across Leeds, and they have disproportionately affected areas of multiple deprivation such as Harehills. Much work has successfully been undertaken by Ward Councillors, the Police, and the Council’s Safer Stronger Communities Team to make Harehills a more attractive and safer (retail) area. Their success in reducing street drinking and crime levels will be significantly undermined by yet another retail outlet selling alcohol which intends to sell alcohol for consumption off the premises from Monday to Saturday 08:00 - 20.00 and Sunday 11:00 - 19.00</p>		
<p>Leeds City Council has produced a matrix to estimate alcohol harm for each Middle Super Output Area (MSOA) in Leeds. Each MSOA is given an overall score which places the MSOA into a comparative city-wide risk rating. There are 107 MSOA’s in Leeds. LS9 6NG was awarded an overall harm from alcohol related risk as 10 out of 107 LSOAs, putting it within the high risk of alcohol-related harm category. Analysis of the individual scores on the matrix contribute to creating a fuller picture of the local community and will be highlighted forthwith with reference to the criteria.</p>		
<p>Protection of children from harm - This area has the high count of off licenses in Leeds and is risk rated as high with a rank rating of 21 By having another off-licence premises selling alcohol, this will jeopardise the protection of children and young people from harm. This area has the 4th highest number of children under the age of 16 in Leeds District and is ranked very high. The increased number of establishments selling alcohol and the subsequent proliferation of street drinkers and local residents suffering from alcohol addiction normalizes the situation for children and as they grow older it sets the benchmark of what is normal in their area. We know from much peer reviewed evidence such an environment can have a strong influence on impressionable children in low-income neighborhoods and can create low aspiration amongst this peer group. Vulnerability to alcohol-related problems: a policy brief with implications for the regulation of alcohol marketing (TF. Babor et al, 2017). Furthermore, Roundhay road is a busy walking route of primary aged school children and their parents for two local schools in the area including Bankside Primary School and Hillcrest Primary School. The abundant presence of alcohol outlets, and associated marketing in children's environments may normalise alcohol as an every-day</p>		

product, shift social norms in acceptability and use, and shape children's knowledge, attitudes, and beliefs.
Children's home and school neighbourhood exposure to alcohol marketing (T Chambers et al.,2018).

This area has a **high** number of young people not in education or training; it is ranked - **13 out of 107 MSOA's**. There is also a low level of educational attainment with a **high** rate of pupils not achieving a strong pass in English and Maths and is **ranked 10 out of 107 MSOA's**. Viewed alongside this the area has the highest number of looked after children and young people, which is **ranked very high - 1 out of 107 MSOAs**, which is a concern as they are more vulnerable to harm. These children and young people will have experienced trauma within the family home severe enough to warrant their removal from that family home. Their life experience will undoubtedly be skewed from the norm which often results in the young person engaging in harmful behaviours, one of which is alcohol drinking. 'Children living in the most deprived areas were almost five times more likely to be exposed to off-sales alcohol outlets than children in the least deprived areas' **Inequalities in children's exposure to alcohol outlets in Scotland: a GPS study** – (Fiona M. Caryl et al.,2022).

Domestic Violence and Abuse and Adverse Childhood Experiences (ACEs) and links to alcohol

Although alcohol alone cannot cause domestic violence and abuse it can lead to aggressive incidents, anger, irritable and be a trigger point for some.

"Alcohol can affect our self-control and decision-making and can reduce our ability to resolve conflict. Global evidence shows that alcohol use can increase the severity of a violent incident" Alcohol and domestic abuse | Alcohol Change UK

National data suggests, almost one in three women aged 16-59 will experience domestic abuse in her lifetime – *Office for National Statistics (2019) Domestic abuse in England and Wales overview: (November 2019)*

ACEs, such as being a victim of violence or neglect, or living with a household member who abuses substances or is involved in criminal activity, are associated with negative adult outcomes such as health harming behaviours, chronic conditions, and increased health care utilisation and costs. (Routine enquiry for history of adverse childhood experiences (ACEs) in the adult patient population in a general practice setting: **A pathfinder study (2018)**)

During lockdown, national statistics illustrated that activity across Refuge's specialist services had increased significantly during lockdown. Between April 2020 and February 2021, the average number of calls and contacts logged* on their database per month was 61% above the January-March 2020 period A year of lockdown: Refuge releases new figures showing dramatic increase in activity – Refuge

Approximately 22,000 domestic abuse incidents were reported to the Police in Leeds in 2019 (West Yorkshire Police).

In Leeds 4680 cases were taken to Multi Agency Risk Assessment Conference (Marac) This is where high or medium risk cases of domestic abuse are referred and discussed by practitioners to increase safety and reduce risk of serious harm to victims/children/vulnerable adults. Of these cases **3989 involved children**. (MARAC data 2021). During the pandemic in Gipton and Harehills there was increased reports of domestic violence and abuse (DVA) due to drinking more heavily and increased stress. Due to the sensitive nature of the data, it is not possible to share Gipton and Harehills information however on in the Inner East area which covers Gipton and Harehills data indicates a count of 188 for one week 2nd – 8th January 2023 (Gipton and Harehills had the highest count of the 3 areas which includes Burmantofts & Richmond and Crossgates and Whinmoor).

The HATCH partnership which works with local organisations, Leeds City Council and the NHS created a subgroup to focus on DVA. HATCH aims to improve the health and wellbeing of people who live in Chapeltown, Burmantofts, Harehills and Richmond Hill. I have chaired this group for a year we have delivered training courses for local organisations, community events and social media campaigns. Given the complexities of the communities and the struggles that communities face and how alcohol can impact on DVA and children within families it would be detrimental to grant this license.

Prevention of public nuisance

Alcohol specific related admissions to hospital are **high** in the area – risk ranked as **12** in Leeds **out of 107 MSOA's** and ambulance callouts related to alcohol are also **high** in Leeds (**11 out of 107 MSOAs**). These are avoidable pressures to the NHS and illustrate the harm caused by easy access to cheap alcohol within an area.

Prevention of crime and disorder

Increasing the availability of cheap strong alcohol is strongly correlated with a higher prevalence of alcohol-related crime and disorder. This is backed up by statistics from Safer Leeds, which record the number of incidents of ASB, drunk and disorderly and violent crime stats

Anti-social behaviour where alcohol was flagged (excluding violent crime) was **high** risk ranked as **18 out of 107 MSOA's**, and violent crime was **high** and ranked **10 out of 107 MSOAs**. Statistics relating to drunk and disorderly is **high** and ranked as being **11 out of 107 MSOA's**. These indicators both suggest a risk to public safety as well as high levels of crime and disorder in existence in the community. This will be exacerbated by the increased accessibility of alcohol.

Healthwatch and other 3rd sector organisations prepared a report focusing on Covid 19 and issues facing the communities in Gipton and Harehills. A survey was completed by 80 people of which a third of the respondents' said crime was something they wanted to see changed in Gipton and Harehills. The issues most often referenced were street drinking and drug dealing, as well as violence and generally not feeling safe in streets and parks.

One participant stated, ***"She didn't want to live in the area when her children grow up due to the amount of gang crime, anti-social behaviour, street drinkers, domestic violence and litter."***

Another participant commented ***"She regularly has to deal with anti-social behaviour on her street and in the local area. Drink and drugs are a big problem, and she doesn't feel safe letting her child play in the garden without her, due to concerns of needles and other rubbish that he may pick up and hurt himself with. There is also the issue with the new bus stop on Compton Road being used by alcohol drinkers as a shelter whilst people waiting for the bus have to wait outside as there is no space or they are too intimidated to go inside"***.
COVID Prevent: Living in Gipton and Harehills during the Pandemic and Beyond (June 2021).

Nowell Mount Community Centre is five mins away from the proposed off license, residents from the local area were contacted and have provided statements below.

"I personally think it is a bad idea as we are overrun with off licenses as it is in the area, I mean why so many that sell alcohol when that is one of the mainstream issues of the area, street drinkers and violence etc. May I also add that drinkers and violence bring down our area on a daily basis I have grown up in Harehills all my life but now find Harehills Lane is a no go area after a certain time as you are harassed either to go in one of the so many off licenses or betting shops or by the street drinkers sat out on the lane it's not nice so no another one would not be appreciated"

"Being a resident from this area I would like to say I would really support the refusal of yet another off license in this area. Its promoting alcohol which has been a big issue with congregating on the Compton's leading to assaults, it leads to relationships becoming abusive because of the easy access to buying alcohol. The area is becoming an alcoholics haven nothing positive is going to bring change to this area if we keep allowing it to become a front-line area. Its putting people off walking down or up Harehills lane now because people are becoming afraid of what might greet them. How can this help people get the support for addictions if shops are feeding them with what is killing them. We need health and wellbeing around here not more alcoholics and people who use drugs. Our kids have to go to school and see all this and it's not fair. Please do not influence more problems by allowing this to open".

“With the cost of living as it is, they need to make change. The amount of fast food, off license, betting shops on Harehills Lane just cries deprived area. It is like the council does not want the next generation to have anything nice to look for, too.

Parents are probably giving kids £2/3 to get a meal as it is cheaper than shopping, and using gas, the cycle begins. Teenagers think it is cool to hang outside these off licenses, and then they will be introduced to vapes and alcohol. Then the cycle begins.”

Street drinking and the associated negative safety and environmental impacts on residents and businesses has been a long-standing issue in the Gipton and Harehills ward. The availability of another outlet selling alcohol will contribute to these challenges in the area.

I attend a partnership group of the Police, the third sector (Touchstone) and the Council. The 3rd sector organisation Touchstone have developed relationships with the street drinkers, to support them and when ready to refer into alcohol services in Leeds. Around 12-15 people now regularly attend and engage with support services at these sessions, with over 104 individuals engaging with the sessions overall. The availability of an accessible alcohol will undermine the achievements and pro-active work that has already taken place with street drinkers in the area.

Southern House Job Centre is a **2 minute walk** from the proposed off license. Emma Woolford, employment and skills manager, City Development, Leeds City Council provided a statement below.

“I am writing to highlight the negative impact enabling 480 Harehills Lane to have a license to sell alcohol would have on people using Southern House Job Centre. Southern House supports some of our most vulnerable residence in Leeds. It sits within the priority ward of Burmantofts and Richmond Hill, with the priority neighbourhoods of Nowell Mt in extremely easy walking distance. This area currently has some of the highest unemployment rates in the city. The shop would be easily accessible to a vulnerable community who can at times be dealing with highly emotional situations some living with long term unemployment. I believe making it easier for those using Southern House to access alcohol could impact on their engagement with the centre, the shop is on the walking route to and from the site for many of the service users. Easy access to alcohol in the area may encourage people to drink outside the Job Centre creating an unsafe, uninviting environment for others accessing the site for support too. I feel as an organisation that supports this vulnerable community who access this site it is our responsibility to create a supportive, conductive environment for those looking for work.”

The intelligence provided above relates to the potential harm caused by alcohol within an area and viewed together creates an understanding of why this area was ranked as being an area of Leeds at high risk of alcohol related harm. Furthermore, this application also falls within a cumulative impact assessment (CIA) area. This means as a Local Authority (LA) licensing authority we have a responsibility to help limit the number or type of licence applications granted in areas where there is evidence to indicate that the number or density of licensed premises in the area is having a cumulative negative impact. Therefore, leading to problems which are undermining the licensing objectives as explained above.

In summary extending the accessibility of alcohol in the area is highly likely to add to the burden of ensuring public safety in the local area, moreover, there is a high population of vulnerable children and young people living within the area who will bear the brunt of increased accessibility to alcohol. This is in addition to facilitating the need for ambulance call-out and hospital admissions because of alcohol consumption.

The pandemic has undoubtedly impacted on the communities in a priority neighbourhood in terms of economic decline adding increased alcohol to an already saturated environment to communities who are struggling with daily life, poverty and deprivation, domestic abuse, low mood, anxiety and depression is irresponsible and will be detrimental to child development, family life and public order.

I would therefore urge the licensing subcommittee to refuse this application to avoid the potential harm to children, additional crime and disorder offences and maintain public safety.

Signed:



Date: 21 June 2023