

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: Baba Jaga 2, 12-14 Strathmore Drive LS9 6AB

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 Baba Jaga 2, 12-14 Strathmore Drive LS96AB.</p>		
<p>Regarding the above application, I would like to bring to your attention the negative impact this premises has. 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.</p>		
<p>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 Burmantofts/Richmond Hill and 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.</p>		
<p>Following visits from trading standards and West Yorkshire Police it was found that the premises was selling non-duty paid alcohol and illegal tobacco. Furthermore, on a number of separate occasions the premises sold alcohol to police cadets who were under the age of 18, showing that they are not promoting the licencing objectives. I am objecting to the continuation of this licence for the protection of children from harm.</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. LS96AB was awarded an overall harm from alcohol related risk as 18 out of 107 LSOAs, putting it within the high risk of alcohol-related harm category.</p>		
<p>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 -</p>		
<p>This area has the very high count of off licenses in Leeds and is risk rated as high with a rank rating of 6. By allowing this off-licence premises to continue to sell alcohol, this will jeopardize the protection of children and young people from harm. This area has the rank rating of very high; it has the highest number of children under the age of 16 in Leeds District (ranked 1). The increased number of establishments selling alcohol and the subsequent proliferation of street drinkers and 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 peer reviewed evidence, this type of 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).</p>		

Due to the high numbers of children in the area there are many schools and childcare providers some of which are listed below and are within one mile of the premises, which is located on a busy route for primary aged school children and their parents.

- Harehills Family Early Years Centre, Cowper Terrace, Harehills, Leeds LS9 7BA (0.3 miles away)
- Little Owls Nursery Harehills, Cowper Terrace, Harehills, Leeds LS9 7BA (0.2 miles away)
- Sunshine Community Nursery, 97 Harehills Rd, Harehills, Leeds LS8 5HS (0.5 miles away)
- Shepherds Lane Children's Centre, Shepherds Ln, Harehills, Leeds LS8 5AW (0.7 miles away)
- Harehills Primary School, Darfield Rd, Harehills, Leeds LS8 5DQ (0.3 miles away)
- St Augustine's Catholic Primary School, St Wilfrid's Circus, Harehills, Leeds LS8 3PF (0.4 miles away)
- Co-op Academy Nightingale, 9 Stanley Rd, Harehills, Leeds LS9 7AX (0.5 miles away)
- Co-op Academy Woodlands, Foundry Pl, Harehills, Leeds LS9 6DA (0.2 miles away)

The GIPSIL - Archway Resource Centre 95 Roundhay Rd, Harehills, Leeds LS8 5AQ) is also only 0.7 miles away. GIPSIL, work with vulnerable young people and have provided statements previously on the impact of off license on young people they work with.

The abundant presence of alcohol outlets, and associated marketing in children's environments may normalise alcohol as an every-day 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 **very high** number of young people not in education or training; it is ranked – **9 out of 107 MSOA's**. There is also a low level of educational attainment with a **very high** rate of pupils not achieving a strong pass in English and Maths and is **ranked 1 out of 107 MSOA's**. Viewed alongside this the area has the highest number of looked after children and young people, which is **ranked high - 9 out of 107 MSOAs**, which is highly concerning 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)**.

The table below gives data provided by West Yorkshire Trading Standards for Gipton and Harehills ward. The rows in grey are the totals for the years stated and then below those are the counts for Underage sales (UAS) or Counterfeit (tobacco or vapes) and along the top is the breakdown in complaints/visits for tobacco/vapes. When comparing 2022/23 to 2023/24 (even with this year being incomplete) total tobacco complaints/tobacco visits and vape visits have increased from the previous years, indicating that communities are worried about underage selling or counterfeit (tobacco or vapes).

Gipton & Harehills	Tobacco complaints	Tobacco visits	Vapes complaints	Vapes visits
All years	102	75	18	23
UAS	10	41	18	12
Counterfeit	92	34	0	11
2020-21	26	11	0	0
UAS	3	8	0	0
Counterfeit	23	3	0	0
2021-22	24	31	5	1

UAS	3	15	5	1
Counterfeit	21	16	0	0
2022-23	24	14	8	4
UAS	3	3	8	1
Counterfeit	21	11	0	3
2023-24 (incomplete)	28	19	5	18
UAS	1	4	5	10
Counterfeit	27	15	0	8

Prevention of public nuisance -

Alcohol related harm hospital stays (narrow, age std. rate) are **very high** in the area – risk ranked as **14 out of 107 MSOA's** and ambulance callouts related to alcohol are also **high** - **23 out of 107 MSOAs**. These are avoidable pressures to the NHS and illustrate the harm caused by easy access to cheap alcohol with un 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 **4 out of 107 MSOA's**, and violent crime **was very high** and ranked **9 out of 107 MSOAs**. Statistics relating to drunk and disorderly is very **high** and ranked as being **10 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 third 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 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.”***

Currently in public health we are conducting Health Needs Assessment for Gipton and Harehills and Burmantofts and Richmond Hill, many local people have talked about their worries around alcohol, noise nuisance/environmental concerns, crime, and fear of crime.

I am part of the Harehills CommUNITY partnership meetings led by West Yorkshire Police and Leeds City Council, many local organisations are committed to the Clear Hold Build initiative to make Harehills a better place for communities to live, work and grow. Off license premises like Baba Jaga undermine all the hard work and commitment that is taking place to improve the area.

Below is a statement provided by the lead GP partner at Chapeltown Family surgery which is situated less than a mile away from the premises.

I am writing to express my deep concern about the sale of alcohol to underage individuals within our community. As the children and families lead for the Burmantofts, Harehills and Richmond Hill PCN I have been aware of this by the public health team but while the health implications are clear, I would like to highlight other critical reasons why I am so concerned.

1. **Social Responsibility:** *Fundamentally we have an obligation to protect our young people. Selling alcohol to minors undermines this responsibility. By allowing access to alcohol, we inadvertently contribute to potential harm and negative consequences for these young people.*
2. **Risk of Dependency:** *Early exposure to alcohol can lead to dependency issues later in life. Adolescents' brains are still developing, and alcohol consumption during this crucial phase can alter brain chemistry and increase the likelihood of addiction. When looking at childhood trauma the negative consequences of alcohol misuse whilst growing up is a clearly recognised risk factor for problems throughout the life course.*
3. **Social Behavior and Safety:** *In my experience a number of my younger patients have ended up in trouble with the police because of alcohol consumption. When minors gain access to alcohol, it can lead to risky behaviors, accidents, and even criminal activities. It is our cities ambition to create safer communities for children and young people to grow up in. Clearly curbing underage sales, we contribute to safer communities and protect both young individuals and the general public.*

Thank you for considering my concerns.

Dr Hasantha Jayasinghe (Senior Partner)

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.

The data above shows that there are significantly higher numbers of children, vulnerable young people and those not in education or training who may seek comfort in tobacco/ alcohol/vaping which we can see Baba Jaga provided cheap tobacco products and vapes which had liquid higher than the permitted amount. It can also have a detrimental effect on health not knowing what is contained in illicit tobacco or high strength vapes. Providing cheap products can encourage those who are dependent on alcohol and tobacco to increase their usage and can be particularly difficult for street drinkers who are trying to curb their reliance.

The area already suffers with high rates of violent crime, antisocial crime, ambulance callouts; impacting on emergency services and the NHS which are already strained with limited resources and capacity. The test purchases completed illustrate the premise holder is not selling alcohol and tobacco as a responsible retailer, which are undermines the licensing objectives.

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

I would therefore ask the licensing subcommittee to question what purpose will it serve to allow this premises to continue to operate?

Considering, the evidence of how local people, organisations feel and failed test purchases I would urge the subcommittee to support the closure of this off license to avoid the potential harm to children, additional crime and disorder offences and maintain public safety.

Signed: 

Date: 01/12/2023



Entertainment Licensing
Leeds City Council
Civic Hall
Leeds
LS1 1UR

Elections and Regulatory Services

Civic Hall
Leeds LS1 1UR

Our Ref: A80/CB/LIC/PREM/01387/008

Your Ref:

Contact: Carmel Brennand

Tel: 0113 3785029

Fax: 0113 3367124

Email: [REDACTED]

Date: 3 December 2023

Dear Sirs/Madam,

**REVIEW APPLICATION UNDER THE LICENSING ACT 2003
PREMISES: BABA JAGA 2, 12 – 14 STRATHMORE DRIVE, LEEDS, LS9 6AB**

Please accept this formal representation by an officer on behalf of the Licensing Authority. I am employed as a Senior Liaison & Enforcement Officer within Leeds City Council's Entertainment Licensing Section.

My duties include investigating complaints for licensed/unlicensed premises contrary to the Licensing Act 2003 as well as visiting licensed premises with other agencies to ensure compliance under the Licensing Act 2003, in promoting the four licensing objectives; the prevention of crime and disorder; public safety; the prevention of public nuisance and the protection of children from harm. I have delegated authority under the said Act.

This shop at this address was previously licensed under the 1964 Licensing Act and the then current owner converted to a Premises Licence in August 2005 under the new Licensing Act 2003. The hours for the sale of alcohol were 08:00 to 22:30 Monday to Saturday and 10:00 to 22:30 on Sundays.

In January 2022 applications were received to transfer the Premises Licence to Baba Jaga 2 Ltd and the new Designated Premises Supervisor to be Omar Rashka. Companies House checks revealed that Baba Jaga 2 Ltd (Co 12093950) had been incorporated on the 9th July 2019 with Mr Rashka being appointed Director on 10th November 2021. As correct paperwork was not received until March, the new Licence PREM/01387/005 was not issued until 25th March 2022 and it was this Licence that was in force on the 16th June 2023.

On the 16th June 2023 I took part in a multi-agency operation visiting shops in the Harehills area. At 1.15 pm I visited Baba Jaga 2 at 12-14 Strathmore Drive in company with colleagues from West Yorkshire Police. Officers from His Majesty's Revenue & Customs (HMRC) and Trading Standards were already on site. I spoke to the person in charge [REDACTED] as the Designated Premises Supervisor Omar Rashka was not on site.

I conducted an inspection under the Licensing Act 2003. The Part B of the Premises Licence was displayed in the shop but behind the counter only on view to staff. I explained that under Section 57 (3) (a) of the Licensing Act it must be prominently displayed so that members of the public are able to view it. When I asked for the Part A of the Licence, ██████ went through a pile of paperwork under the counter but was unable to find it. It is an offence under Section 57 (2) (a) for the Premises Licence Holder not to secure the Licence or a copy of it is kept at the premises. I completed an inspection sheet giving 2 weeks for this to be complied with. ██████ signed the inspection sheet and I gave him a copy of it. I advised ██████ that if he was unable to find the Licence he should apply for a duplicate Licence which would cost £10.50.

The Part B of a Premises Licence is usually only 1 A4 page. It is a summary of the Licence stating the premises, the hours that the premises can carry on licensable activities as well as details of the Premises Licence Holder and the named Designated Premises Supervisor.

The Part A of a Premises Licence can be several pages and includes the same information as the Part B but also the terms and conditions which must be complied with to sell alcohol or carry on any other licensable activities. If it is not available to staff on site, how can they ensure that they are complying with all the conditions on the Licence?

I believe that officers from HMRC seized a significant amount of non-duty paid alcohol and Trading Standards seized counterfeit tobacco. Whilst we were leaving I noted that a vehicle parked outside the shop was being seized by the police.

At 11.30 am on 19th July 2023 I revisited the premises in company with PC Haywood. ██████ was again on site and I asked for The Part A of the Premises Licence. He admitted that he had been unable to find it. I gave him my business card and advised him to email our Section with the request and to include his telephone number so that we could take the payment over the phone. The Part B was still not displayed prominently. I asked for the Part B and placed it above the entrance door so now visible to members of the public.

██████ or the Premises Licence Holder must have contacted our Section that same day as when I checked our systems sometime later I noted that a duplicate Licence had been paid for on the 19th July and posted out on the 8th August 2023.

West Yorkshire Police conducted test purchases at these premises on the 13th and 25th September 2023 and members of staff sold alcohol to a child on both occasions. Both these members of staff have committed an offence under Section 146 and the Premises Licence Holder and Designated Premises Supervisor and/or other managers have potentially committed offence under Section 147 of the Licensing Act 2003, namely:-

This is an offence under Sections 146 & 147 of the Licensing Act 2003 :

146 Sale of alcohol to children

(1) A person commits an offence if he sells alcohol to an individual aged under 18.

(4) Where a person is charged with an offence under this section by reason of his own conduct it is a defence that—

(a) he believed that the individual was aged 18 or over, and

(b) either— (i) he had taken all reasonable steps to establish the individual's age, or

(ii) nobody could reasonably have suspected from the individual's appearance that he was aged under 18.

(5) For the purposes of subsection (4), a person is treated as having taken all reasonable steps to establish an individual's age if—

(a) he asked the individual for evidence of his age, and

(b) the evidence would have convinced a reasonable person.

(6) Where a person (“the accused”) is charged with an offence under this section by reason of the act or default of some other person, it is a defence that the accused exercised all due diligence to avoid committing it.

(7) A person guilty of an offence under this section is liable on summary conviction to a fine not exceeding level 5 on the standard scale.

147 Allowing the sale of alcohol to children

(1) A person to whom subsection (2) applies commits an offence if he knowingly allows the sale of alcohol on relevant premises to an individual aged under 18.

(2) This subsection applies to a person who works at the premises in a capacity, whether paid or unpaid, which authorises him to prevent the sale.

(5) A person guilty of an offence under this section is liable on summary conviction to a fine not exceeding level 5 on the standard scale.

Due to the serious nature of these offences, PC Haywood invited Omar Rashka to Elland Road Police Station. PC Haywood and I met with Omar Rashka on the 4th October 2023. Whilst Omar Rashka admitted he was the Licence Holder and owned the shop, he stated he had been on honeymoon for the past 15 days so had not been at the shop when the sales took place.

Section 182 Guidance to the Licensing Act 2003 states:

‘the responsible personal licence holder may not be able to escape responsibility for the actions of anyone authorised to make sales.

Similarly, the premises licence holder remains responsible for ensuring that licensing law and licence conditions are observed at the premises.

During the meeting Omar Rashka stated that [REDACTED] (one of his staff members who sold alcohol to a child) has been his manager for 2 years and that he holds a personal licence holder. I advised Omar Rashka that this is even more concerning as to hold a personal licence he has had to pass a BIIAB (British Institute of Innkeeping Awarding Body) exam and as such it is expected that his knowledge and understanding of his responsibilities under the Licensing Act would be higher than a person who hasn't done the course and the exam. Omar Rashka promised that this would never happen again, however as I told him, I believed that these 2 occasions were not isolated and that children have been able to buy alcohol and indeed vapes and cigarettes at his shop.

Following receipt of a review application submitted by West Yorkshire Police I attended outside the shop on the 18th October 2023. In accordance with the Licensing Act I attached an A4 blue notice to the nearest lamp post to the shop. This notice advises the general public that a review application has been received by the Licensing Authority, the grounds on which the application has been made and gives the contact details should any members of the public wish to make any representation. Whilst I attached the blue notice to a lamp post at the side of the shop [REDACTED] came outside. I gave him the letter addressed to Mr Omar Rashka and explained the notice would be in situ for 28 days and that Mr Rashka should have received a copy of the application. [REDACTED] confirmed that they had received the review application.

On the 24th October 2023 the Entertainment Licensing Section received applications to transfer the Premises Licence to Gusto Market Mini Ltd and vary the Designated Premises Supervisor to Nabaz Ibrahim Karim. Companies House shows that Gusto Market Mini Ltd was incorporated on the 18th October 2023, a day after Mr Omar Rashka received his copy of the review application and the same day I displayed the review notice outside the subject premises. Due to representations I understand these applications will be heard before the Licensing Sub Committee on the 5th December 2023.

As a result of the initial review application not being signed and deemed invalid, West Yorkshire Police resubmitted a review application on the 2nd November 2023.

On the 9th November 2023 the Entertainment Licensing Section received an application on behalf of Gusto Market Mini Ltd to minor vary the Licence to add conditions in relation to cctv, a Refusals Register, Proof of Age and staff training as well as guarantees that alcohol and tobacco products will only be purchased from reliable and traceable suppliers. There is also a condition that Omar Rashka will not be a Director of a company holding the Premises Licence, not specified as the Designated Premises Supervisor or be involved in the day to day running of the shop as either a manager or member of staff. I understand that this minor variation has been granted.

However I am concerned that these very recent applications are simply a paperwork exercise to get around the review and would ask that the Licensing Sub Committee satisfy themselves that this is not the case.

It is clear from the continuous breaches of the Licensing Act 2003 and the seizures of illicit alcohol and tobacco that Omar Rashka is not a responsible retailer. He has failed to comply with a variety of legislation and is unconcerned about the impact his business has on the immediate community. It is clear that he has failed to operate responsibly in upholding the objectives; the prevention of crime and disorder and the protection of children from harm and I therefore support the review being brought by West Yorkshire Police.

Yours faithfully

A solid black rectangular box used to redact the signature of Mrs Carmel Brennand.

Mrs Carmel Brennand
Senior Liaison & Enforcement Officer
Entertainment Licensing

Gipton & Harehills Ward
Labour Councillors
Councillor Arif Hussain
Councillor Salma Arif
Councillor Ashgar Ali
Civic Hall
Leeds, LS1 1UR

FAO: Leeds City Council's
Entertainment Licensing Team

Civic Tel 0113 37 88811



28th Nov 2023

Dear To Whom It May Concern

Subject: Licence Review, Baba Jaga 2, 12-14 Strathmore Drive PREM/01387/008

As ward Councillors we are writing to **support** the licence review of Baba Jaga 2 on Strathmore Drive.

Strathmore Drive is in the heart of Harehills and in close proximity to the main arteries of Harehills Road and in particularly Harehills Lane, both of which are already saturated with retail outlets legally selling alcohol.

To put this into context, along Harehills Lane and Harehills Road, approximately 70% of shops are selling alcohol. These alcohol outlets sit – quite literally – adjacent to people's homes, children's schools as well as places of worship. Harehills is a densely populated neighborhood; a place where what happens on the street has a huge impact on the local community.

According to the 2019 Index of Multiple Deprivation, Gipton & Harehills Ward has 17 Lower Super Output Areas (LSOAs) that are amongst the 10% most deprived in the country. That is more than any other Ward in Leeds. Coupled with this cumulative deprivation is the fact that Gipton & Harehills Ward is:

- Gipton and Harehills is second most populated Ward in Leeds with 33,645 residents living in 12,400 properties; nearly 10% of homes are classed as overcrowded.
- The Ward is both young and dynamic; 29.5% of residents are children and young people aged 14 or under. 53% of the population is aged 29 or under.
- 4,303 children and young people aged 0-15 in Gipton & Harehills live in the most income deprived households in England.
- Whilst 62.4% of the population is economically active; long term unemployment is double the Leeds average and those that have never worked is at 15.2%, which is

nearly four times the Leeds average. Women from the Ward active in the job market is also notably lower than the Leeds average.

- 33.3% of working age people are receiving universal credit.
- Gipton and Harehills Ward is very diverse, with 63% of the population identifying as being from an ethnic minority; 72% of households reported that English was a first language.
- As a migration hub, the Ward has hundreds of languages spoken and numerous faiths live in close proximity (75% of households identify as being religious against a Leeds average of 65%).
- Nearly 56% of households don't have access to a car or van.
- Fuel poverty for the Ward stands at 29.9%, 8.4% of households don't have central heating.
- Crime is higher than the Leeds average with violence and sexual assault, public order, ASB and criminal damage presenting as the main issues

Source: <https://observatory.leeds.gov.uk/deprivation>

Numerous residents, both young and old and of all faiths and backgrounds, have talked to all three of us about their experiences of drink related abuse and violence on their doorstep. This behaviour as led to damage to property, broken glass, urine and worse left on the pavements outside of people's homes.

Against this backdrop, the idea that a business in the heart of Harehills could be not only operating illegally but compounding these issues by selling alcohol to underage children, as well as illicit tobacco products, is simply staggering.

Such is the scale of alcohol related issues in Harehills, a Cumulative Impact Assessment (CIA) was introduced by the council in early 2019 and has been re-drafted and enlarged in November 2022; this enlarged area now includes the site of Baba Jaga 2:

<https://democracy.leeds.gov.uk/documents/g11973/Public%20reports%20pack%209th-Nov-2022%2010.00%20Licensing%20Committee.pdf?T=10> The response from Harehills residents to the CIA consultation was both compelling and shocking, but sadly not surprising.

Indeed, we feel passionately that this licence should be reviewed in light of the compelling evidence presented by the Police, as letting this business trade illegally would be seriously damaging to the health of the people of Harehills; from local residents, parents and children who have to witness anti-social behaviour on their doorstep as the result of alcohol abuse to the vulnerable children who may exposure to alcohol and tobacco products that they otherwise wouldn't have access to.

For over three years, a dedicated partnership made up of local Cllrs, council officers, the Police and representatives from the community and voluntary sector have sought to address the issue of problem drinking in Harehills. Problem street drinking is a

tragic but inevitable bi-product of the availability of cheap alcohol, sold from numerous outlets, at all hours.

This latest development around the sale of illegal alcohol to children is a major concern. The following paragraphs outline the arduous journey that has been undertaken to help tackle problem drinking in adults in Harehills. To think that potentially another generation of our children could be embarking on this path because of access to illegal alcohol is frankly terrifying and cannot be allowed to happen.

To expand, the multi-agency partnership is taking-up this complex challenge is on several fronts. Focus is being given to disruption, which includes enforcing the existing Public Space Protection Order (PSPO: <https://www.leeds.gov.uk/antisocial-behaviour-and-crime/public-spaces-protection-orders/harehills-pspo>) and serving injunctions on the more troublesome street drinkers.

In tandem to this approach, there is also a concerted effort to engage with this cohort of drinkers to address their needs around addiction. This work has proven challenging for the partnership given the obvious tension between balancing the imperative to support individuals who are addicted to alcohol and the concerns of the wider community who are suffering because of their actions. A constant pressure for the partnership is allowing the space and time for the outreach work to pay dividends whilst demonstrating to residents that this issue is being taken seriously via enforcement activity that reduces unacceptable levels of anti-social behaviour.

Genuine relationships are being forged under difficult circumstances by Touchstone's dedicated outreach worker who has conducted numerous visits to the Harehills area to date. Allied to this, alcohol supply has sought to have been addressed through the continued defence of the council's Cumulative Impact Assessment (CIA) and the opposition of any new off licenses; four applications have been declined in recent times, but tens of off-licences remain in a less than two-mile square radius. A prominent derelict site on Compton Road has also been target hardened following work by Cleaner Neighbourhoods Team colleagues, as it was a magnet for street drinkers.

Ward Members from both Gipton and Harehills and Burmantofts and Richmond Hill have committed funding for the Touchstone outreach worker, with group sessions for this cohort taking place at a local café on Harehills Lane. Encouragingly, around 12-15 people now regularly attend and engage with support services at these sessions, with over 129 individuals with alcohol dependency issues attending since October 2021.

Incremental progress is being made with two attendees in rehab; one individual is not attending due to "now working" and some of those who attended on a regular basis are now staying at home, in a relationship or visiting family i.e. positive lifestyle changes. Most refrain from drinking to attend the session then go home afterwards. Furthermore, some clients changed their drinking behaviour and reported increased

confidence and self-worth. In addition, there was a take up of new registrations with Forward Leeds, who supported the drop in sessions.

Allied to this, colleagues in Leeds Anti-Social Behaviour Team, along with the Police and the Safer, Stronger Communities Team are constantly working in partnership using all the available legislation including the Anti-Social Behaviour Crime and Policing Act 2014 to address the issue of problem street drinking and associated community concerns.

The innovative use of 'Closure Orders', granted under anti-social behaviour legislation further bolstered the existing PSPO in the area for a time. The Closure Order, which denied access to a specific area if people are in possession of an open container of alcohol, also gave officers additional powers to ensure there was the necessary balanced approach that allowed officers to support the needs of the community as well as the needs of a group of individuals with very serious challenges around addiction.

East Leeds Neighbourhood Policing Team undertook the following action in relation to the Closure Order, which ran from December 2021 until June 2022:

- 92 x individuals issued with warnings
- 36 x individuals reported for summons to court, for breaching the order and previous warnings issued
- 7 x individuals arrested for offences including breach of the closure order, breach of bail and drunk and disorderly.
- 3 x individuals prosecuted and fined in court, for breaching the partial closure order

Closure Order: <https://www.westyorkshire.police.uk/news-appeals/new-powers-tackle-street-drinking-harehills-leeds>

As a community, along with the council, statutory services and local community and voluntary sector groups we are exhaustively trying to redress the current imbalance in an area where alcohol misuse is having a detrimental effect on the lives of residents.

Ignoring the very real and serious concerns raised by the Police in this licence review, will be slap on the faces of everyone who has campaigned for the CIA, the PSPO, the closure order as well as those working hard to support people with alcohol addiction and those wanting a safer future for themselves and their children.

As Ward Councillors, we hope you will consider the concerns raised above and come to the decision that Harehills does not need, want or deserve an off license selling illegal alcohol and tobacco.

We say with a united voice, please consider the impact on our children, they deserve so much better than this.

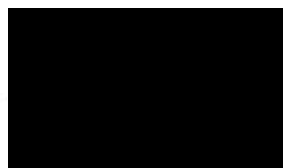
Yours sincerely



Councillor Arif Hussain



Councillor Salma Arif



Councillor Asghar Ali