

APPENDIX H

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:

Section 2 – Your personal details

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

Title Mr Mrs Miss X Other _____

Surname **Slezak**

First name(s) **Emilia**

Address (incl postcode):

Leeds City Council, Public Health 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>Please tick relevant box(es)</p>	Prevention of crime and disorder	X <input type="checkbox"/>
	Prevention of public nuisance	X <input type="checkbox"/>
	Protection of children from harm	X <input type="checkbox"/>
	Public safety	X <input type="checkbox"/>

Please select:

X I object to the application being granted at all.

I object to the application being granted in its current form*

*If you choose this option, remember to tell us in the next section what changes you would prefer to see.

The grounds of the representation is based on the following:

I would like to make a public health objection to the application of Booze 4 U, 220 Roundhay Road, Leeds, LS8 5AA.

Regarding the above application, I would like to bring to your attention the negative impact this premises will have. There are concerns regarding the potential harm to children, crime and disorder and public safety.

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 Burmantofts/Richmond Hill and Harehills. Much work has successfully been undertaken by Ward Councilors, 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.

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.

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.

Protection of children from harm -

This area has a high count of off licenses in Leeds and is risk rated as high with a rank rating of 16. By allowing this off-licence premises to continue to have a license, even under new management, will jeopardize the protection of children and young people from harm. This area has the rank rating of very high; it has the second highest number of children under the age of 16 in Leeds District (ranked 2). The increased number of establishments selling alcohol and tobacco and vapes normalizes the behavior for children and as they grow older it sets the benchmark of what is normal in their area.

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 school children and their parents. Below is a list of some of the child care providers and schools less than a mile away from the premises.

- Harehills Family Early Years Centre, Cowper Terrace, Harehills, Leeds LS9 7BA (0.1 miles away)
- Little Owls Nursery Harehills, Cowper Terrace, Harehills, Leeds LS9 7BA (0.1 miles away)
- Sunshine Community Nursery, 97 Harehills Rd, Harehills, Leeds LS8 5HS (0.3 miles away)
- Shepherds Lane Children's Centre, Shepherds Ln, Harehills, Leeds LS8 5AW (0.1 miles away)
- Harehills Primary School, Darfield Rd, Harehills, Leeds LS8 5DQ (0.6 miles away)
- Co-op Academy Nightingale, 9 Stanley Rd, Harehills, Leeds LS9 7AX (0.7 miles away)
- Co-op Academy Woodlands, Foundry Pl, Harehills, Leeds LS9 6DA (0.8 miles away)

- Hovingham Primary School, Hovingham Ave, Harehills, Leeds LS8 3QY (0.4 miles away)
- Bankside Primary School, Shepherds Ln, Harehills, Leeds LS8 5AW (0.2 miles away)
- Rosewood Nursery, 21 Roseville Rd, Harehills, Leeds LS8 5DT (0.5 miles away)
- Dixons Trinity Chapeltown, Leopold Street, Chapeltown, Leeds LS7 4AW (0.6 miles away)
- Chapeltown Childrens Centre, 62 Leopold St, Leeds LS7 4AW (0.7 miles away)

The GIPSIL - Archway Resource Centre 95 Roundhay Rd, Harehills, Leeds LS8 5AQ is also only 0.4 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 neighborhood 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 – 4 out of 107 MSOA's. There is also a low level of educational attainment with the highest rate of pupils not achieving a strong pass in English and Maths and is high and ranked 20 out of 107 MSOA's. Viewed alongside this the area has a very high number of looked after children and young people, which is ranked high - 13 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 name of the business is also concerning. As it uses a colloquial term 'Booze' this indicates that its main purpose of the business is to sell alcohol. The use of language in the name of the business using the number '4' and letter 'U' also suggests it is targeting a younger audience.

Prevention of public nuisance -

Rates of Drunk and disorderly are **Very high** in the area – risk ranked as **7 out of 107 MSOA's** and litter callouts **Very high - 3 out of 107 MSOA**. The world health organisation (WHO) recognizes that exposure to waste can have a negative impact on health to communities and can cause and contribute to several adverse health and developmental issues, in particular, in children (WHO, 2021)

It is also important to note that 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 -

Healthwatch and other third sector organizations 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.

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 behavior, 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.

The area is undergoing the Clear Hold Build operation. Of which is currently in the Clear phase. The area in which the premises is has a cumulative impact assessment (CIA). There are already a high number of licenses in the area.

We are aware that organised crime groups (OCGs) operate within the area and use off licenses to operate from. We are also aware that they impose pressure on other licenses in the area, which we would not want anyone to have experience.

Touchstone have been providing the TOPS (Touchstone Outreach and Prevention Service) In the Harehills area for approximately the last 2 years with further funding for another year confirmed. This project, works with street drinkers in the Harehills area, offering support and signposting. The group meet twice weekly in the meeting point café. This service is only 0.8 miles away from this premises.

Karen Fenton, Community Health Development Services Manager, Touchstone provided a statement below.

“We work with a highly complex, vulnerable, cohort of the local population, who are often excluded from wider services, whilst managing complex lives, trauma and dependencies on drink and require person centred support. This licensed premises providing illicit tobacco and alcohol is likely to have a negative impact upon our work and the health of these individuals and a knock-on effect to the wider community in Harehills and Burmantofts and Richmond Hill Ward.”

As notes above, 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 and alcohol.

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, domestic abuse, low mood, anxiety, and depression it is socially irresponsible to enable, another off-licence and will be detrimental to child development, family life and public order.

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

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

Signed: [REDACTED] Date: 22/03/2024