

From:Duckworth, Sue
Sent:29 Aug 2024 13:53:51 +0100
To:Entertainment Licensing
Subject:FW: Blayds Bar, 3-5 Blayds Yard, Leeds - Letter of Representation
Attachments:Blayds City Centre Aug 2024.pdf, Cumulative Impact Assessment City Centre 2024.pdf

For your info.

Sue Duckworth | Principal Licensing Officer

Entertainment Licensing | Leeds City Council

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W:[Alcohol and entertainment \(leeds.gov.uk\)](https://www.leeds.gov.uk/alcohol-and-entertainment)

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From: Duckworth, Sue
Sent: Thursday, August 29, 2024 1:51 PM
To: [REDACTED]
Subject: Blayds Bar, 3-5 Blayds Yard, Leeds - Letter of Representation

Dear [REDACTED]

Please find attached the licensing authority letter of representation to your application for Blayds Bar.

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Private & Confidential

Duncan McCallum

Contact: Susan Duckworth

Tel: [REDACTED]

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Email: [REDACTED]

By email: [REDACTED]

20th March 2023

Blayds Bar, 3-5 Blyds Yard, Leeds, LS1 4AD
Application for a premises licence under the Licensing Act 2003
Licensing Authority Letter of Representation

Thank you for submitting your application for a premises licence for the above premises.

The area in which the subject premises is located is a cumulative impact area. Specifically, your application falls within the cumulative impact area of City Centre as described in the Statement of Licensing Policy at paragraphs 7.15 to 7.18 which states:

- 7.15 The council has assessed crime statistics for the area known at the city centre which is located between the A58M motorway and the river Aire and has determined that there is an area that is suffering from the cumulative impact of licensed premises and consequently this is leading to problems which are undermining the licensing objectives.
- 7.16 Specifically and in addition to this, there are two areas of special concern designated as red zones where the impact of the licensed premises is so severe that the council considers that any application for a new licence or the variation of an existing licence should be refused unless the applicant can show how their application would not lead to an increase in the impact of licensed premises in this area. Maps showing the exact geographical area included in this area, and specifically the red zones can be found in the cumulative impact assessment.
- 7.17 In this area the nature of the problems is alcohol related violent crime being perpetrated on people visiting and using this area during specific peak hours. More information on the evidence can be found in the cumulative impact assessment.
- 7.18 It would be inconsistent with the council's duty to promote the licensing objectives to grant new and variation application for any premises licence (on sales, off sales and late night takeaways) that seek to operate during the peak hours described in the cumulative impact assessment for the city centre.

I refer you to the council's Cumulative Impact Assessment for City Centre (pages 9-16 of the Cumulative Impact Assessment 2023-25) for further information. This provides both crime data, and the data for the area in which the premises is located.

I refer you to 7.38 to 7.46 of the Policy which describes how applications for premises situated within a designated cumulative impact area for new premises licences or variations that are likely to add to the existing cumulative impact will normally be refused and it is for the applicant to demonstrate that their application would not add to the cumulative impact.

I also refer you to 7.45 of the Statement of Licensing Policy which describes examples of factors the licensing authority will not consider as meeting the standard of rebuttal include:

- That the premises will be well managed and run as all licensed premises should meet this standard.
- That the premises will be constructed to a high standard.
- That the applicant operates similar premises elsewhere, such as in another licensing authority area, without complaint.

Alcohol Licensing Data Matrix

In 2021 the Council updated the Alcohol Licensing Data Matrix. The data used in the Matrix has been updated and is now based on a larger area known as MSOA. A [MSOA](#) is a geographic area designed to improve the reporting of small area statistics in England and Wales. MSOAs are built from groups of contiguous LSOAs. The minimum population is 5000 and the mean is 7200. The Organisation Data Service publish files created on their behalf by the Office for National Statistics, which link postcodes to the Middle Layer Super Output Area. This enables the Matrix user to input a postcode, for this to be linked to a MSOA and the data for that MSOA to be ranked against all other areas in Leeds.

By entering the postcode for the premises the matrix displays the ranking of this MSOA against certain data sets. This allows responsible authorities and the licensing authority to establish the problems being experienced in the MSOA. The Matrix also provides an overall ranking against all 107 MSOA areas in Leeds.

The matrix has rated the MSOA concerned (Leeds City Centre – E02006875) as **very high**. It is ranked 1st highest out of 107 MSOAs for potential alcohol related harm.

Indicator	Category	Rank (1 is most harm)
Ambulance callouts related to alcohol	Very High	1
Antisocial behaviour - alcohol related	Very High	1
Crime where alcohol flagged	Very High	1
Drunk and disorderly	Very High	1
Licensing risk score	Very High	1
Noise complaints	Very High	1
Off licence premises	Very High	1
On licence premises	Very High	1
Violent crime where alcohol flagged	Very High	1
Alcohol Use Disorders Identification Test	Very High	8
Litter complaints	High	10
Alcoholic liver disease mortality rate	High	18
Alcohol specific emergency admissions	High	20
Not achieving English & Maths strong pass	Medium	47
Deprivation Score	Medium	50
Alcohol treatment, all episode counts	Medium	53
Alcohol related harm hospital stays	Low	63
Looked after children	Low	79
NEET (not in education or training)	Low	105
Population aged 16 and under	Low	106
Stroke emergency hospital admissions	Low	107

As expected this area ranks highest in the City for off licence and on licence density. It ranks highest in the city for alcohol related antisocial behaviour, alcohol flagged violent crime, drunk and disorderly crime. It ranks highest in the city for licensing risk score. This relates to the score given by Licensing Enforcement officers after they have undertaken a routine inspection of premises, and relates to several public safety matters, the highest weighted of which is confidence in management. It rates highest for ambulance callouts, which relate to callouts for people residing in the area (rather than visiting). It ranks 8th for AUDIT test scoring. This relates to the number of units patients living in the city centre MSOA advise their GP they are consuming per week. All of these data are categorised as 'very high' which is the rating given to the top 9 MSOAs.

This MSOA ranks 'high' for litter complaints, alcohol liver disease mortality rate and alcohol specific emergency admissions. Again, this is a count of the incidents related to people that reside in this area, rather than are visiting.

Overall, this shows this area suffers from alcohol related crime and disorder and alcohol related concerns for people's safety. The health statistics show that this area has a relatively high number of people who may be suffering from alcohol dependency.

In the conclusions to the Cumulative Impact Assessment (page 61) the Council determined that any application in the red zone could expect to receive representations and that the peak times are 23:00 to 02:00.

Your Application

Your application is for a premises licence for sale of alcohol, late night refreshment, recorded music, live music and other similar entertainment. You have applied for the hours of Monday to Saturday 11am to 01:00 the next morning and Sunday 12:00 to 00:30.

I am aware, from our conversation, that this licence application is to replace a licence that lapsed due to the dissolution of the company that held the licence. As such the application mirrors the previous licence exactly.

Conclusion

As already described, the area in which the premises sits is recognised as an area suffering from the density of licensed premises. There are high levels of crime and disorder in this specific area, enough that the Council have designated it a cumulative impact area. These issues are generally related to the high levels of people, in drink, who use this area late at night. These problems cannot be attributed to one specific premises.

Therefore, the licensing authority submits a formal representation to your application on the grounds of the prevention of crime and disorder, public safety and public nuisance and will recommend to the licensing sub-committee that this application is considered in the context of cumulative impact, and if it considers that this licence would add to that impact that it is refused.

Yours faithfully

A solid black rectangular box used to redact the signature of Susan Duckworth.

Susan Duckworth
Principal Licensing Officer
Entertainment Licensing