



**Elections and Regulatory Services**  
Civic Hall  
Leeds LS1 1UR

**Private & Confidential**

Graudo Foods Ltd  
Unit 2  
480 Harehills Lane  
Leeds

Contact: Susan Duckworth

20<sup>th</sup> June 2023

**Graudo Foods, 480 Harehills Lane, Leeds, LS9 6NG**  
**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 Harehills as described in the Statement of Licensing Policy at paragraphs 7.29 to 7.31 which states:

- 7.29 The council has assessed crime statistics for the area known as Harehills and has determined that there is an area that is suffering from the cumulative impact of off-licensed premises and consequently this is leading to problems which are undermining the licensing objectives. Specifically the area around Harehills Road and Harehills Lane is particularly suffering from the cumulative impact of too many off licences. Maps showing the exact geographical area included in this area can be found in the cumulative impact assessment.
- 7.30 In this area the nature of the problems is alcohol related violent crime and nuisance being suffered by people living in this mainly residential area. More information on the evidence can be found in the cumulative impact assessment.
- 7.31 It would be inconsistent with the council's duty to promote the licensing objectives to grant new and variation application for any premises licence which seeks off sales and late night refreshment to operate during the peak hours described in the cumulative impact assessment for Harehills.

I refer you to the council's Cumulative Impact Assessment for Harehills (pages 41 – 50 of the Cumulative Impact Assessment 2023-25) for further information. This provides both crime data,

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and the data on 18 data sets for all three MSOAs affected. Please see page 42 to 44 of the Cumulative Impact Assessment.

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 based on areas known as MSOAs. A [MSOA](#) is a geographic area which represents a population of around 7200. 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 (Burmantofts – E02002394) as **high**. It is ranked 10<sup>th</sup> highest out of 107 MSOAs for potential alcohol related harm.

Indicator	Category	Rank
Looked after children	Very high	1
Deprivation Score	Very high	3
Alcohol related harm hospital stays (narrow, age std. rate)	Very high	3
Population aged 16 and under	Very high	4
Not achieving English & Maths strong pass	Very high	6
Off Licence premises count	Very high	7
Violent crime where alcohol flagged, count	High	10
Stroke emergency hospital admissions ( age std. rate)	High	10
Drunk and disorderly, count	High	11
Ambulance callouts related to alcohol, count	High	11
AUDIT tests scoring 16 or more (higher risk)	High	11
Alcohol specific emergency admission count	High	12
NEET (not in education or training)	High	13
Alcohol treatment, all episode counts	High	15
Antisocial behaviour - alcohol related, count	High	18
Alcoholic liver disease mortality rate	Medium	41
Licensing risk score	Medium	46
On Licence premises count	Low	98

These 18 data sets either demonstrate the vulnerability of children and adults who live in the area or are directly related to one of the four licensing objectives.

To explain what this means, the area in which your premises is located ranks highest in Leeds for looked after children. It is categorised as very high for the data sets relating to looked after children, population under 16, children not achieving a strong pass in English or Maths and for density of off licences. This shows that there are a very high number of vulnerable children and families living in an area that already has a high number of licensed premises selling alcohol for consumption off the premises, i.e. minimarkets and corner shops.

Reported crime data such as alcohol flagged violent crime, drunk and disorderly and antisocial behaviour are categorised as high, which shows this area is already suffering from alcohol related crime and disorder. This is high even within the context of an area where the reporting of crime is historically low.

Regarding vulnerable people, this area scores high for ambulance call outs relating to alcohol, audit test scores which indicate people are drinking more than 16 units a week, alcohol specific emergency admissions to hospital and alcohol treatment. This clearly shows there is a high risk to vulnerable people who may be suffering from alcohol harm.

These data points towards an area with both adults and children suffering from alcohol related harm, whether that be directly or indirectly. All this is confirmed by the anecdotal evidence provided by residents for the 2018 Cumulative Impact Assessment.

To provide some more context, in the Harehills and Burmantofts cumulative impact area, there are more than 29 premises which hold licences to sell alcohol for consumption off the premises and many more on-licences and takeaways, all within a ten minute walk away.

In the area around your premises there are the following licensed premises:

Fritz's	7 Shaftesbury Parade, Harehills Lane	On and off sales
Nisshan Convenience Store	411 - 413 Harehills Lane	Off sales
Nowell Stores	422 - 424 Harehills Lane	Off sales
Fusion	426 Harehills Lane	Takeaway
The Reliable Shop	432 Harehills Lane	Off sales
Taste Of China	4 Osmondthorpe Cottages	Takeaway
Royal Booze	5 Osmondthorpe Lane	Off sales
Top Shop News and Off Licence	9 Osmondthorpe Lane	Off sales
Iceland Frozen Foods Plc	Torre Lane	Off sales
B & M Bargains	Unit B, Torre Lane	Off sales
Rookwood Stores	530 York Road	Off sales
Gourmet Garden Chinese	597 York Road	Takeaway
The United Services Club	51 St Alban Road	On and off sales
Rani Superstore	82 Osmondthorpe Lane	Off sales

All of the premises on this list are within a ten minute walk away. More worrying though is the proximity of one of the Council's priority areas known as 'The Nowells', which is the community your shop will serve.

The council holds a 6 weekly multiagency group where various agencies, including ward members, Entertainment Licensing, West Yorkshire Police (Neighbourhood Policing and Police Licensing), Touchstone, which provide outreach treatment services, Environmental Health and others to discuss the ongoing issues in the area. Those most reported are the issues related to street drinking, where large groups of people stand in the street to drink and socialise. These groups often display antisocial behaviour. We know from the outreach work, that people come from all over the city to Harehills to stand and drink in the street. The reason for this is the proliferation of small shops selling alcohol.

Specifically in Harehills, we are aware that it is not just dependent drinkers that drink in the street. For some who live in the area, the way they socialise is to stand in their own back streets, or between the terraced housing drinking with neighbours and friends. This way of socialising can be loud and disturbing for other neighbours and comes with a host of issues around littering and public urination.

## **Your Application**

Your application is for a premises licence to sell alcohol for consumption off the premises from Monday to Saturday 8am to 8pm and Sunday 11am to 7pm.

In your application your operating schedule includes staff training, CCTV, incident book, monitoring of the outside of the premises and a challenge 25 scheme. It is clear from your application that you were not aware of the cumulative impact assessment for Harehills as there has been no attempt to offer conditions that would mitigate the concerns on this area.

Every application is considered on its own merits, whether it is in a cumulative impact area or not. I have carefully considered your application, as applied for, and cannot see where you have addressed any of the issues.

The issues relate to people drinking and urinating in the street, and the associated antisocial behaviour. People purchase their alcohol from premises such as yours. Many of them purchase alcohol at the same time as food and other goods, and so are hard to identify. They purchase their alcohol at all times of the day. They are not concerned about what type of alcohol they buy and have been found with all types of alcohol including low and high strength beer, lager and cider as well as spirits such as vodka. It is for this very reason, along with the density of other licensed premises within a short walk away, that this area was designated as suffering from the cumulative impact of off licences.

The fact that this premises is in a cumulative impact area places the onus on you, as the applicant, to demonstrate to the licensing authority how your premises would not add to the problems being experienced here.

## **Conclusion**

Bearing in mind the severity of the problems being experienced in the area, with this area suffering from issues with people drinking on the street and causing disorder and anti-social behaviour issues, the Licensing Authority is of the opinion that your application does not contain sufficient information about how granting your licence would not add to the impact already being experienced in the area. Therefore, the licensing authority submits a formal representation to your application on the grounds of the prevention of crime and disorder, public safety, public nuisance and the protection of children from harm and will recommend to the licensing sub-committee that this application is refused.

Should you have any questions, please contact us.

Yours faithfully

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

Susan Duckworth  
Principal Licensing Officer  
Entertainment Licensing