

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:

M and S 24'7 Off licence 128 Roundhay Road, Leeds,
LS8 5NA

Section 2 – Your personal details

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

Title	Mr <input type="checkbox"/> Mrs <input checked="" type="checkbox"/> Miss <input type="checkbox"/> Other _____
Surname	Patel
First name(s)	Chetna
Address (incl postcode): Leeds City Council, Public Health (Localities and Primary Care Team), 5 th Floor West, 110 Merrion House, Leeds, LS2 8BB.	
<p>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.</p> <p>Please refer to our Guidance Note – GN-M Guidance on making representations for further information and alternative options.</p>	

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						
<p>Please indicate capacity:</p> <table style="width: 100%;"> <tr> <td><input type="checkbox"/> Representative of Residents Association</td> <td><input type="checkbox"/> Ward Councillor</td> <td><input type="checkbox"/> Parish Council</td> </tr> <tr> <td><input type="checkbox"/> MP</td> <td><input type="checkbox"/> Trade Association</td> <td><input type="checkbox"/> Other (please specify) _____</td> </tr> </table>		<input type="checkbox"/> Representative of Residents Association	<input type="checkbox"/> Ward Councillor	<input type="checkbox"/> Parish Council	<input type="checkbox"/> MP	<input type="checkbox"/> Trade Association	<input type="checkbox"/> Other (please specify) _____
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<input type="checkbox"/> MP	<input type="checkbox"/> Trade Association	<input type="checkbox"/> Other (please specify) _____					

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>	<table> <tr> <td>Prevention of crime and disorder</td> <td>X</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Prevention of public nuisance</td> <td>X</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Protection of children from harm</td> <td>X</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Public safety</td> <td>X</td> <td><input type="checkbox"/></td> </tr> </table>	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"/>
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"/>											
<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 M and S 24'7 Off licence 128 Roundhay Road, Leeds, LS8 5NA</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.</p> <p>Following a visit from West Yorkshire police on the 23 of August 2023. The Premises licence holder was on site at the time of the visit. West Yorkshire Police have raised concerns that the premises is selling nitrous oxide laughing gas and alcohol to under age children. At the premise 10 boxes of 6 large cannisters were found as well as sets of 10 sets of 16 balloons.</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. The postcode LS85NA was awarded an overall harm from alcohol related risk as 2 out of 107 LSOAs, putting it within the very 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 extremely high count of off licenses in Leeds and is risk rated as high with a rank rating of 2. This area has the rank rating of very high; number of children under the age of 16 in Leeds District (ranked 3rd). 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 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, the road in which is premises is on is a busy route for primary aged school children and their parents for several local childcare providers which are listed below:</p>													

- Rosewood Nursery 21 Roseville Rd, Harehills, Leeds LS8 5DT (0.2 miles away)
- Little Owls Nursery Chapeltown, Leopold Street, Chapeltown, LS7 4AW (0.2 miles away)
- Little Owls Nursery Shepherds Lane, Chapeltown Leeds LS8 5AN (0.4 miles away)
- Shepherds Lane Children's Centre, Shepherds Ln, Harehills, Leeds LS8 5AW (0.4 miles away)
- The Mosaic Centre Pre-school Leopold Street, Chapeltown, LS7 4AW (0.3 miles away)
- Sunshine Community Nursery 97 Harehills Rd, Harehills, Leeds LS8 5HS (0.4 miles away)
- Harehills Family Early Years Centre, Cowper Terrace, Harehills, Leeds LS9 7BA (0.7 miles away)
- Co-op Academy Nightingale, 9 Stanley Rd, Harehills, Leeds LS9 7AX (0.5 miles away)
- Harehills Primary school, Darfield Rd, Harehills, Leeds LS8 5DQ (0.8 miles away)
- Bankside Primary School, Shepherds Ln, Harehills, Leeds LS8 5AW (0.4 miles away)
- Hillcrest Academy, Cowper St, Leeds LS7 4DR (0.4 miles away)
- Shakespeare Primary School and Nursery Lincoln Rd, Leeds LS9 7NP (0.7 miles away)
- Dixons Trinity, Leopold Street, Chapeltown, Leeds LS7 4AW (0.2 miles away)
- Holy Rosary and St Anne's Catholic Primary School Leopold St, Leeds LS7 4AW (0.4 miles away)
- Hovingham Primary school Hovingham Ave, Harehills, Leeds LS8 3QY (0.9 miles away)

The GIPSIL - Archway Resource Centre 95 Roundhay Rd, Harehills, Leeds LS8 5AQ is also only 0.1 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. All distances above are calculated in relation to walking distances.

This area has a **medium** number of young people not in education or training; it is ranked – **26 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 37 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 - 7 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, which can be alcohol drinking or using nitrous oxide to get high. '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).**

Nitrous Oxide -

The government announced a ban on sales of nitrous oxide for human consumption (non-legitimate use), two problems with nitrous oxide were identified.

- The health problem with chronic use leading to B12 deficiency and neurological impacts (nerve damage).
- The anti-social behaviour problem of recreational drug use in public areas and littering of nitrous oxide cannisters leading to communities feeling unsafe.

Nationally, nitrous oxide is the third most used drug after cannabis and powder cocaine in England and Wales (ONS, 2022). There is no national data on regional or socio-demographic variations in use but there is soft intelligence that certain communities may have higher use.

Sensitive data is restricted and therefore cannot be provided in the public domain; however, the Community Safety Performance and Intelligence Safer Stronger Communities Team have provided information below.

- **Harehills/ Harehills Corner:** identified as an area with high levels of reported issues. Almost all late evening/ overnight reports. Reports identified refer to small groups of males (usually 4 to 6 individuals) either sitting in car inhaling from cannisters, or on street causing other nuisance and using balloons or cannisters to inhale gas. These groups often causing noise nuisance and some are also smoking what is suspected to be cannabis.

- Several reports suggest ongoing issues with repeat incidents are not always being reported.

This correlates with national data which suggests Nitrous Oxide is often used by young men. The Association of Police and Crime Commissioner (APCC) Addiction and Substance Misuse leads (2023) have welcomed the ban citing the impact on public spaces and communities of anti-social behaviour. They also cite health harms including injury on roads.

Prevention of public nuisance -

Alcohol related harm hospital stays (narrow, age std. rate) are already **very high** in the area – risk ranked as **7 out of 107 MSOA's** and ambulance callouts related to alcohol are also **very high - 4 out of 107 MSOAs**. Nationally hospital admissions for nitrous oxide and solvents appear to be increasing but data was not available at the time of the Advisory Council on the Misuse of Drugs Report.

Prevention of crime and disorder -

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 illicit tobacco, alcohol, noise nuisance/environmental concerns, crime, and fear of crime. Many people worry about what their children see and experience daily.

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 M&S undermine all the hard work and commitment that is taking place to improve the area.

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; and in this case is acting irresponsibly. This area already suffers with significant violent crime, antisocial crime, ambulance callouts and alcohol admissions issues within the area which would have been likely to increase with the amount of nitrous oxide found at the premises.

To summarise, the data above shows that there are significantly higher numbers of children, vulnerable young people and those not achieving high standards of English and Maths who may seek comfort in nitrous oxide/ tobacco and alcohol. M&S have not been a responsible retailer and although suggesting this was for cakes. It is highly unlikely 10 boxes containing 6 large canisters would be used on cakes and 10 packs of 16 balloons for birthday parties.

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 nitrous oxide impacts on young people in particular young men, the vast amount of oxide nitrous and balloons found in the premises and the commitment that local organisations demonstrate to improve the area; 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