

**Elections and Regulatory Services**

Civic Hall

Leeds LS1 1UR

Private & Confidential

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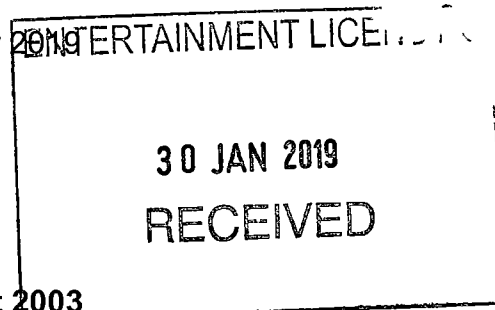
Contact Susan Holden

Tel [REDACTED]

Fax [REDACTED]

Email [REDACTED]

Your ref

30th January 2019

Dear Ms Collingwood

Heron Foods, 25 Town Street, Armley, Leeds, LS12 1UX
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 within a cumulative impact area. Specifically your application falls within the cumulative impact area of Armley as described in the Statement of Licensing Policy at paragraphs 7.24 to 7.26 which states

7.24 The council has assessed anti-social behaviour and crime statistics for the area known as Armley and has determined that there is an area that is suffering from the cumulative impact of off-licensed premises and as a consequence this is leading to problems which are undermining the licensing objectives. Specifically Town Street and Branch Road are the areas affected. Maps showing the exact geographical area included in this area can be found in the cumulative impact assessment.

7.25 In this area the nature of the problems are predominantly anti-social behaviour perpetrated by people purchasing alcohol on Town Street and Branch Road and then remaining in the area to drink it. More information on the evidence can be found in the cumulative impact assessment.

7.26 It would be inconsistent with the council's duty to promote the licensing objectives to grant new and variation applications for any premises licence which seeks off sales of alcohol at any time.

I refer you to the council's Cumulative Impact Assessment for Armley (pages 44 – 55) for further information.



I refer you to 7 32 to 7 39 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 note that your application is for a convenience store selling frozen and convenience store goods and is for the sale of alcohol from 8am to 7pm Monday to Saturday and 10am to 4pm on a Sunday Your opening hours will be the same You have offered CCTV, incident report register, staff training and that outside of the hours for the sale of alcohol, the alcohol will be secured behind locked grills/screens You have offered to place notices at the exits requesting the public to leave quietly, and you have offered a Challenge 25 scheme

Your application does not refer to how you will address the problems being experienced on Armley Town Street which are clearly described in the Statement of Licensing Policy in the excerpt above and in further detail in the Cumulative Impact Assessment

I also refer you to 7 38 of the Policy which describes examples of factors the licensing authority will not consider as meeting the standard of rebuttal include

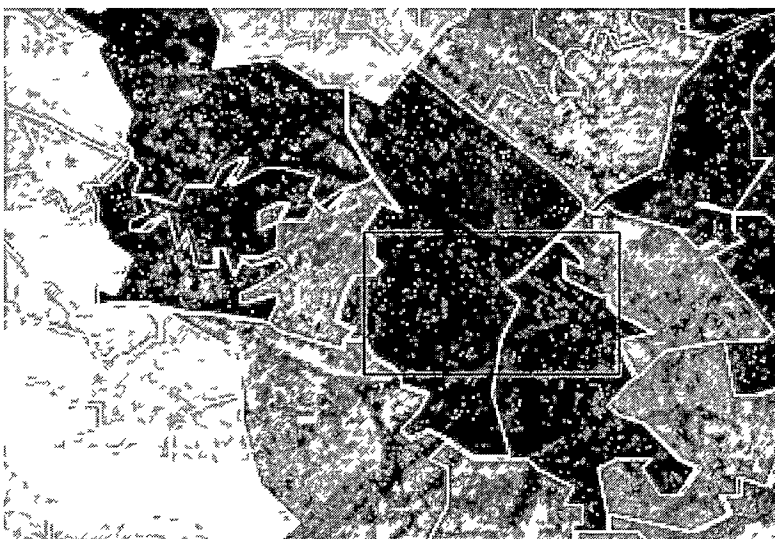
- That the premises will be well managed and run as all licensed premises should meet this standard
- That the premises will be constructed to a high standard
- That the applicant operates similar premises elsewhere, such as in another licensing authority area, without complaint

Alcohol Licensing Data Matrix

A LSOA is Lower Layer Super Output Areas are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales Public Health have produced and maintain a licensing matrix which rank LSOAs (lower level super output area) against each other The Licensing Authority has used this Matrix when undertaking the cumulative impact assessment for this area

By entering postcodes the matrix displays the ranking of this postcodes LSOA against certain data sets This allows responsible authorities and the licensing authority to establish the problems being experienced in the LSOA

This map shows the Armley area Dark red denotes the 15 highest ranked LSOAs, followed by dark orange, light orange and green being the lowest ranked LSOAs



The matrix has rated the LSOA concerned Carr Croft, Cedars, Wesley Road (part of Armley Ward) as **very high** for potential alcohol related harm and is ranked **5 out of 482 LSOAs**. This LSOA is also one of the top 10 LSOAs in Leeds for potential alcohol related harm

The following indicators have 'very high' ratings for potential related harm

- Alcohol related admissions all ages – any hospital **14th**
- Alcohol licensing – off licensed premises density **10th**
- Alcohol related anti-social behaviour **3rd**

And 'high' ratings for the following

- Deprivation score **30th**
- Alcohol related specific admissions all ages – any hospital **28th**
- Alcohol flagged violent crime **12th**
- Clients who use alcohol services **14th**

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 and public nuisance and will recommend to the licensing sub-committee that this application is refused

Should you have any questions, please contact us

Yours faithfully



Susan Holden
Principal Licensing Officer
Entertainment Licensing