



Elections and Regulatory Services

Civic Hall
Leeds LS1 1UR

Private & Confidential

Mr Sarwat Hama Abdullah
c/o JMC Licensing Consultants
Warrington Business Park
Long Lane
Warrington
WA2 8TX
By email: [REDACTED]

Contact: Susan Holden
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Fax: 0113 336 7124
Email: susan.holden@leeds.gov.uk
Your ref:

22nd June 2020

Dear Mr Abdullah

Zuber Mini Market, 29-31 Seaforth Place, Leeds LS9 6AF 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.

I note that your application is for a small retail shop and is for the sale of alcohol from 7am to 10.30pm every day. Your opening hours will be 7am to 10.30pm every day. You have offered CCTV, roller shutters, spirits to be stored from behind the counter, no high strength beer or cider to be sold, no single cans of beer, cider or lager to be sold, an incident log, signage and litter clearance. You have also offered a challenge 25 policy, staff training and proxy signage.

The area in which the subject premises is located has been assessed and is part of the council's Cumulative Impact Assessment which was approved alongside the new Statement of Licensing Policy and was effective from January 2019. The council has gathered crime data and evidence from residents living within this area regarding the accumulation of licensed premises and the impact these premises are having on the licensing objectives and the residents living in this area.

The updated evidence can be found at www.leeds.gov.uk/lpc. This includes more information on the problems being experienced in Harehills. Specifically we have identified the following:

Alcohol Licensing Data Matrix

Lower Layer Super Output Areas are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. An LSOA is a designated area in which 1500 people live. Public Health have produced and maintain a licensing matrix which rank LSOAs (lower level super output area) against each other.

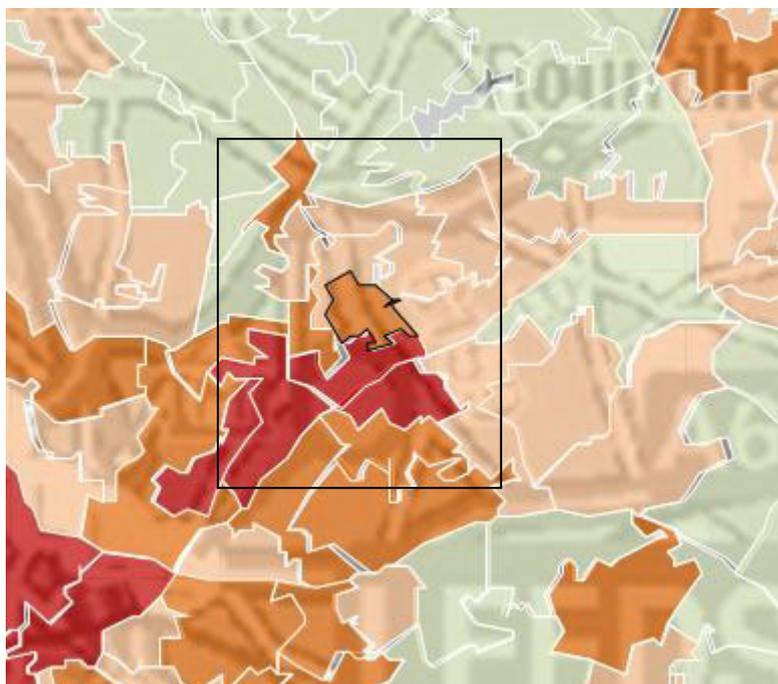
**Website: www.leeds.gov.uk
Switchboard: 0113 222 4444**



INVESTOR IN PEOPLE

By entering the relevant postcode the matrix displays its ranking against specific alcohol related data sets. This allows responsible authorities and the licensing authority to establish the problems being experienced in the area.

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



The Licensing Authority has reviewed the postcode where this premises is situation, LS9 6AF.

LS9 6AF is within the Chatsworths Road, Berkleys, Strathmore Terrace LSOA. Overall, it is ranked 30 of all 482 LSOAs and is considered high, in the top 88-97% for the risk of alcohol related harm. This area is ranked as follows:

Dataset	Ranking out of 482
Deprivation score	20
Population 16 and under	6
Looked After Children	4
Young people Not in Education Employment or Training (NEET)	44
Youth offences	22
% DID NOT achieve grade 9-5 in Eng and Maths Leeds schools	102
Alcohol Licensing - Off licensed premises density	6
Alcohol flagged Total Crime - Excluding violent crime	18
Alcohol flagged Violent Crime	31
Drunk and disorderly or over prescribed limit	75

This table shows that this area is highly ranked for deprivation. It also shows this specific LSO has issued relating to an unusually high number of children resident in the area. It is ranked high for looked after children, children who are considered NEET (not in education, employment and training) and has a high level of youth offences. It is very high for off licensed premises density. It ranks as high for alcohol flagged total crime, alcohol flagged violent crime and drunk and disorderly.

Police Evidence

West Yorkshire Police have produced a statistical report titled "Cumulative Impact Policy Harehills Analysis – December 2017" dated 8th December 2017 which has been referred to when reviewing this area. The key findings of this report are:

- There were 1710 crimes recorded in 'Harehills' during 2016-2017 (01/12/2016 – 30/11/2017).
- The 2016-2017 total crime figure was a 26.7% increase from the previous year.
- Violent Crime accounts for 37% of recorded crimes in the examined area.
- Violence without injury and Public Order offences increased by 123 and 53 offences respectively in 2016-2017.
- There were 361 Nuisance incidents recorded in Harehills during 2016-2017, an increase of 35.2% on the previous year.
- The peak times for Nuisance incidents in the last twelve months was 17:00 – 23:00.
- The number of recorded alcohol related incidents reduced from 30 to 28 in 2016-2017.
- The peak times for alcohol related incidents in the last twelve months was 15:00 – 23:00.
- There were 81 crimes recorded with an 'Alcohol Involved' flag in the last 12 months, a decrease from the 87 recorded the previous year.
- Most offences with an 'Alcohol Involved' flag were Violent Crimes.
- The peak times for crimes with an 'Alcohol Involved' flag in the last twelve months was 18:00 – 23:00.

Public Concerns

As part of the consultation on the Licensing Act 2003 Statement of Licensing Policy the council received 12 consultation responses from residents who live in Harehills. These responses describe what it is like to live in Harehills with problems relating to crime and disorder, public nuisance, public safety and the protection of children from harm.

Specifically one resident states:

"The problem drinkers who are struggling with alcohol addiction need professional support but selling alcohol 24 hours a day in so many shops across the area isn't helpful, it isn't healthy and it isn't necessary. The long opening times mean there isn't a cut-off point. Those who live nearby don't get any peace and quiet overnight which is necessary for a good night's sleep so that adults can function properly in the day and children will be well rested enough for school.

Instead they hear the customers coming and going 24 hours a day and alcohol fuelled arguments and fights. You might expect this if you lived in a flat in the city centre but first and foremost Harehills is a residential area with a large proportion of young families. For some reason this isn't enough to prevent the sale of alcohol for such long periods or in a growing number of cases, 24 hours a day! "

Another states:

"I'm a resident of Harehills and I'd like to voice my concerns regarding the amount of shops in my neighbourhood which sell alcohol for extended periods of time each day.

I would like the number of shops selling alcohol for extended hours to be reduced because I'm sick of the antisocial behaviour my family and I are faced with on account of them, including drunkards arguing and shouting around the clock, public urinating/vomiting and beer cans littering the streets.

This is my formal request that the shops with extended licenses be reduced."

Another states:

“As a concern citizen I have to take issue with the proliferation of 24 hrs off licence in the area, these are a health hazard. There is a school near the main drag where they congregate and the children have to walk around them. Also the use of the bus shelter is a no no. I would like the council to take stock. Most of the shops sell alcohol, and must stop these 24/7 outlets as it denigrate the local area. This also happens on the weekend when they are outside the shop arguing who is going to pay, or the car pulling up with the loud music blaring out while they wait to get serve, if it disturbed me what impact is it on the children?”

Bearing in mind the severity of the problems being experienced in the area, with this area suffering from issues with antisocial behaviour as reported by the residents in the consultation, and the high ranking this area has which indicates a high level of deprivation, issues relating to children and alcohol related crime, as well as this being an area already served by a large number of off licensed premises, 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 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 the Principal Licensing Officer.

Susan Holden
Principal Licensing Officer
Entertainment Licensing