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Leeds District Licensing Department
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11th June 2020

Mr Sarwat Abdullah

cc. Entertainment Licensing Section. Leeds City Council, Civic Hall, Leeds. LS1 1UR
cc. JMC Licensing Consultants Warrington Business Park Long Lane Warrington
WA28TX

RE: Zuber Off Licence 29-31 Seaforth Place Leeds
APPLICATION FOR NEW PREMISES LICENCE – LICENSING ACT 2003:
POLICE – LETTER OF REPRESENTATION – CUMULATIVE IMPACT ASSESSMENT (CIA):

Thank you for submitting your application, which I note, is the second for the above premises after your withdrawal of the original.

As stated previously, the application relates to premises, which fall within one of the areas of Leeds currently subject to a cumulative impact assessment, as detailed in the present Statement of Licensing Policy 2019-2023, issued by Leeds City Council as the licensing authority.

The area concerned in this particular case is **Harehills**.

The revised application provides a lot of information and states that it will allow the Licensing Authority to depart from the Statement of Licensing Policy and install confidence that the application will not add negatively to issues already in the area.

What the new application appears to do, rather than provide a great deal of substance to mitigate issues, it seeks to undermine the data supporting the Cumulative Impact Assessment, but also the views of local residents.

The application states that alcoholic products will accommodate no more than 20% of floor space. I would suggest 20% for one type of product is a significant amount and would be the focus of the shop.

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The application names a number of other shops by name to use as an example, which is misleading and does not reflect the work carried out in the Harehills area by the local authorities.

The applicant states that there are no late night levy, E.M.R.O or PSPO's in the area, "**which you would expect if there was a high level problematic alcohol problem**". Harehills is in fact, covered by a PSPO and this application would fall well within it. So by the applicants own admission, there is an issue with alcohol consumption on the streets of Harehills.

This then brings me on to a section of the application where it states; **the proposed methods of dispersal of customers – this factor is also irrelevant. This is more suited to premises where consumption is 'ON' the premises and with late closing hours.**

This shows a lack of understanding or knowledge of the issues surrounding Harehills. Street drinking being an issue means people operating an off-licence need to be taking a proactive approach to dispersing customers from drinking outside their shops, and to actively promote the PSPO.

I note the mention of the local community Facebook page and the time spent by the applicant's agent reading it to which they state, "I found no reference to a community in crisis". This is a naïve, if not arrogant argument to make against the CIA. A community spirit should not muddy the waters and distract from the actual issue the CIA is there to tackle, which is alcohol related ASB, nuisance and crime. I have checked the same Facebook page and found reference to alcohol related problems in Harehills. Using unrelated positive messages is doing the local residents a disservice.

To cherry pick these positive community posts is dismissing the feelings and experiences of a local resident of 23 years who quoted the following,

"Drunkenness and anti-social behaviours associated with drinking alcohol are increasingly affecting the daily lives of local residents. Whether it be putting up with lewd, bawdy and salacious behaviour from large groups congregated round these shops and local green-spaces, protecting children from having to listen to foul and inappropriate language, witnessing violent interactions taking place in your street and having to deal with the subsequent damage to property such as demolished walls and damaged cars, to clearing up cans and broken glass from discarded bottles before tyres are punctured and children and pets are hurt or hosing down sick and urine spattered pavements and garden walls, the results of uncontrolled alcohol consumption are having an extremely negative affect on the local area."

This and the full quote forms part of the Councils Cumulative Impact Assessment 2018, and gives the impression of a member of the community who is fatigued with the over saturation of shops selling alcohol and the wider impact this is having.

The application states towards the end "**It is highly unlikely that the granting of this application would not require increased policing**". I suspect this was typed in error, however I agree with this statement in its current form.

Again with the following statement. "**The limited hours requested from 07.00 until 22.30 in all probabilities or is highly unlikely to not add to the cumulative impact on the crime and disorder in the area**", I have to agree that it would be unlikely not to add to the issues being that the hours requested are within the peak times.

Although this second application provides more information, the following quotes are still relevant, as nothing of substance has been offered which would allow the Licensing Authority to depart from the current policy.

"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 as a consequence this is leading to problems which are undermining the licensing objectives."

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Specifically the area around Harehills Road and Harehills Lane is particularly suffering from the cumulative impact of too many off licences.

Harehills is an area of Leeds, which has demanded an increase in police resources and attention due to the year on year increase of violent crime and nuisance reports. The peak time for nuisance, incidents are between 17:00hrs and 23:00hrs. The peak time for alcohol, related incidents are between 15:00hrs and 23:00hrs.

To quote again from the Statement of Licensing Policy 2019-2023;

“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.”

West Yorkshire Police are in agreement with Leeds City Council that to grant another premises licence for off sales would not be consistent with the promotion of the licensing objectives.

Therefore West Yorkshire Police make representations based on the cumulative impact assessment of the area concerned and highlighted above, where the licensing objectives and particularly the prevention of crime and disorder and prevention of public nuisance objectives are being adversely affected.


West Yorkshire Police

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