



**Gipton & Harehills Ward
Labour Councillors
Councillor Arif Hussain
Councillor Kamila Maqsood
Councillor Salma Arif
Burmanofts & Richmond Hill Ward
Labour Councillors
Councillor Denise Ragan
Councillor Ron Grahame
Councillor Asghar Khan
Civic Hall
Leeds, LS1 1UR**

Matthew Nelson
Principal Licensing Officer
Entertainment Licensing
(sent via email:
Matthew.nelson@leeds.gov.uk)

Date 26th August 2020

Dear Mr Nelson

As Ward Councillors for both Gipton & Harehills and Burmanofts & Richmond Hill we are writing to express our opposition to the application from Merkur Slots; GPREM/BIN/00014/01; LS9 6AP

This on the grounds of licensing objective: protecting children and other vulnerable persons from being harmed or exploited by gambling.

The Lower Super Output Area covered by this application is one that sees many residents, particularly children and young people, in challenging circumstances. To underline this, the 2019 Indices of Multiple Deprivation (IMD) ranked this LSOA (E01011344, Bellbrook Avenue, Kimberly Road, Comptons) as the 408th most deprived LSOA in England (this is out of 32,488 LSOAs).

It is our belief that the granting of this application would exacerbate existing issues by supplying an opportunity for problem gambling or gambling addiction to take hold in an area already saturated with betting shops.

To illustrate just some of the challenges facing children and young people in this LSOA:

- 16% of households with children are made up families with a lone parent
(Source:
<https://observatory.leeds.gov.uk/population/report/view/5dba8f57461e4f23a9b2f100e865a367/E01011344>)
- Children Looked After are in the highest bracket in Leeds (Source; LCC Licensing Matrix)

- Educational attainment is some of the lowest in England (ranked 368 worst out of 32,488 LSOAs in England:<https://leedsccc.maps.arcgis.com/apps/View/index.html?appid=c7654fdc77044d8cb6019a947506f3fa>)
- The number of young people not in education, employment or training (NEET) is very high (Source; LCC Licensing Matrix)

More broadly, this gambling premises would be in the heart of an area that has a young, vulnerable and deprived population. As a Council we are working hard to engage our children and young people in positive activities through our own Youth Service as well as local youth providers.

The challenge to engage young people positively has been made all the harder by rising youth unemployment, the Covid-19 pandemic and subsequent lockdown measures. It is our firm belief that a gambling operation would pose a very real threat to the health and wellbeing of local children and young people.

As Ward Members for both Gipton & Harehills Ward and Burmantofts & Richmond Hill Ward, we would like to publicly state our opposition to the granting of this gambling application.

Many of the concerns shared above have been raised by local residents from both Gipton & Harehills and Burmantofts & Richmond Hill Wards and we are willing, as Elected Members, to represent their views should this go to a hearing.

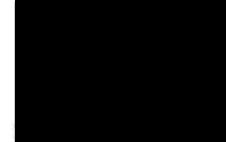
Yours sincerely



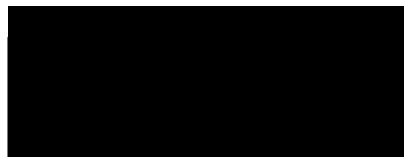
Councillor Arif Hussain



Councillor Kamila Maqsood



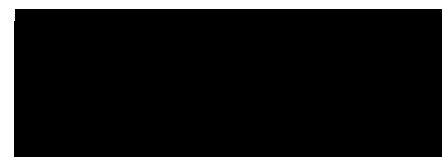
Councillor Salma Arif



Councillor Ron Grahame



Councillor Asghar Khan



Councillor Denise Ragan



From: [REDACTED]
Sent: 27 Aug 2020 14:26:44 +0100
To: Entertainment Licensing
Subject: Planning application objection - 20/04686/FU, 377 - 379 Harehills Lane Leeds LS9 6AP

To whom it may concern

I object to the proposal for an adult gaming centre on the site of 377-379 Harehills Lane.

The proposed gaming site is in a heavily residential area with a high percentage of young people and a multicultural population. The Leeds Index of Multiple Deprivation 2019 ranked areas in Harehills within the most deprived 1% nationally:

<https://observatory.leeds.gov.uk/wp-content/uploads/2019/10/IMD2019KeyFindings.pdf>

Harehills has many existing gambling premises. Outside of these I have witnessed anti-social behaviour including street drinking, litter, and the taking of illegal drugs. There are even reported cases of severe violence: <https://www.bbc.co.uk/news/uk-england-leeds-45776523>

This new site is less than 100 yards from a 24 hour off licence and regularly has groups of drunks travelling a great distance to visit late at night. This has caused cases of aggression and public disturbance. Although this proposal claims to not serve alcohol to customers, there is no doubt that if approved would attract crime and disorder outside of the venue affecting some of the most vulnerable people in the city.

It would be highly detrimental to the area have a new gambling site on these premises. If Leeds City Council is serious about working to reduce anti-social behaviour in the area, then it cannot approve these plans.

I hope that you take this into consideration.

Kind regards



From: [REDACTED]
Sent: 20 Aug 2020 11:06:23 +0100
To: Entertainment Licensing
Subject: RE: GPREM/BIN/00014/01 - Merkur Slots - Representation - [REDACTED]

We operate a business at [REDACTED]

Hope the below comments are now valid.

Kind Regards,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Entertainment Licensing <Entertainment.Licen@leeds.gov.uk>

Sent: 20 August 2020 11:04

To: [REDACTED]

Subject: FW: GPREM/BIN/00014/01 - Merkur Slots - Representation - [REDACTED]

APPLICATION FOR A BINGO PREMISES LICENCE

MERKUR SLOTS, 377 - 379 HAREHILLS LANE, LEEDS, LS9 6AP

I acknowledge receipt of your representation to the application in respect of the above unfortunately I am unable to validate your comments as you have not provided an address so I am unable to define if you live sufficiently close to be affected. Please find below an extract from our guidance which details how to make a representation to a gambling application;

Who is able to make objections?

The Act allows certain individuals, and groups, to make representations about licensing applications. A representation is a reason why the application should not be granted in its current form, or should not be granted at all. Representations can be made in writing by an interested party or responsible authority.

An interested party is someone who:

- *lives sufficiently close to the premises to be likely to be affected by the authorised activities*
- *has business interests that might be affected by the authorised activities*
- *represents persons falling in the categories set out above e.g.*
 - *A trade body or residents association may make representations on behalf of local businesses or residents*
 - *A ward, town or parish councillor may also make representations.*

Upon receiving a representation, the first thing the council will do is determine if the representation has been made by either a responsible authority or an interested party.

On what grounds can I make a relevant representation?

Assuming you fulfil the criteria detailed in the previous section the council will accept your representation however the council must then decide if it is relevant. Generally in order to be relevant your objection should relate to one or more of the three licensing objectives of:

- *preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime;*
- *ensuring that gambling is conducted in a fair and open way; and*

- *protecting children and other vulnerable persons from being harmed or exploited by gambling.*

In addition you must ensure your representation is not vexatious, or frivolous. A frivolous representation is one which is not a serious representation. A vexatious representation is one which is made to annoy or upset the applicant and for no other purposes. The council is also unable to accept representations that would certainly not influence the determination of the application. Two items which the Act says the council must not consider and hence would certainly not influence the determination of the application are:

- *Whether there is demand for the proposed facilities*
- *Whether the proposal is likely to be permitted under the relevant planning and building legislation*

So a representation which says ‘we already have enough bingo halls/betting shops etc in the area’ would be one that the Licensing Authority would not take into account. A representation which says ‘this shop only has planning permission for use as a retail unit not as a betting shop’ would be one that the council would not take into account. Both of these things are matters which would certainly not influence the authority’s decision.

In summary the only representations that are likely to be relevant are those that:

- o relate to the licensing objectives, or that raise issues contained in the council’s licensing policy statement, or in the Gambling Commission’s guidance or codes of practice and*
- o are not about planning or demand issues*
- o are not frivolous or vexatious.*

If you could provide me with your address I will be able to determine the validity of your representation. Please ensure you do so no later than the 27th August 2020.

I have attached a copy of our guidance on making representations for your assistance and am hopeful that it will give you further information required.

If you have any questions or wish to discuss anything further please do not hesitate to contact me.

Kind Regards

Mrs Victoria Radford
Licensing Officer
Entertainment Licensing
Tel: 0113 378 5029
victoria.radford@leeds.gov.uk
www.leeds.gov.uk

Please note my working days are Tuesday, Wednesday and Thursday.

From: [REDACTED]
Sent: 16 August 2020 20:11
To: Entertainment Licensing <Entertainment.Licen@leeds.gov.uk>
Subject: 377 - 379 Harehills Lane LS9 6AP (MERKUR SLOTS) - OBJECTIONS

Dear Sirs,

FAO: Entertainment Licensing Department - Leeds City Council

Please see below list of objections in relation to the above subject,

There are already several betting shops on Harehills Lane, including Betfred, Paddypower and Corals. Other betting shops within the same vicinity include William Hill and another Betfred on Harehills Road. The cumulative impact of such establishments on a local area well documented and their presence squeezes out those independent traders we need to support in such a deprived market following tougher times during the pandemic.

The level of crime in Harehills is already at its peak, statistics show 982 street level crimes were committed in the area in June 2020 alone!. By opening a further gambling establishment would only result in a congregation outside the premises day and night, where the police are presently finding it difficult to manage such anti-social behaviour. With the level of congregation outside such premises, it would make customers and shop keepers feel vulnerable and uneasy due to the type of financial work they carry out, especially people paying into Lloyds and using their facilities. Furthermore, having a gambling establishment adjacent to a school uniform shop it sets a bad example to the children.

There are several off licenses in the area, where such individuals have habits / addictions which only results in further anti social behaviour. Under Public Spaces Protection Orders were introduced in October 2017 to tackle a range of anti-social behaviour, street drinking orders are currently under review for Harehills, which already goes to show the level of crime associated with the drug.

Harehills is one of the most deprived areas in Leeds, the council has recently approved of the Selective License scheme, which would help improve the level of housing and in turn the quality of tenants. However opening such establishments within the area only helps towards the downturn from tenants not wanting to live in the area.

If you require any further information, please don't hesitate to contact me.

Kind Regards,

[REDACTED]

Please bear with us if we take longer than usual to respond to your email, this is due to the challenges of the unprecedented coronavirus COVID-19 crisis.

To find out more about how our services are affected, what local support is available, and how we're managing coronavirus in Leeds, go to www.leeds.gov.uk/coronavirus.

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Legal notice: Leeds City Council contracts on the basis of a formal letter, contract or order form. An e-mail from Leeds City Council will not create a contract unless it clearly and expressly states otherwise. For further information please refer to: <https://www.leeds.gov.uk/your-council/councillors-and-democracy/council-constitution>

From: [REDACTED]
Sent: 11 Aug 2020 13:47:53 +0100
To: Entertainment Licensing
Subject: GPREM/BIN/00014/01 objection

Hi,
I would like to object to this application for a gambling premise licence.

My reasons are as follows-

I live at [REDACTED] - [REDACTED] at. [REDACTED]

The area I live in is not the nicest of places to live and this will only attract more people to the area. I feel quite unsafe already and if approved I will feel even more unsafe and frightened to leave my home. These types of establishments attract a lot of men. I am a young woman living alone.

Just like many other casino/gambling/bingo place people congregate outside. My living room window looks onto [REDACTED] this will be very noisy.

I work various shifts at St James hospital so am sometimes coming home late on in the evening - I have to walk close by the Premise to get to [REDACTED]. [REDACTED]

[REDACTED] and this again I feel people will gather. [REDACTED]

I already have anxieties about this and they will only grow if approved. I fear I will eventually be unable to leave my home due to fear of been verbally/physically abused.

Please let me know if you require any further information.

Kind Regards,

[REDACTED]

Sent from my iPhone



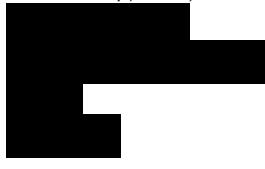
From: [REDACTED]
Sent: 17 Aug 2020 11:33:10 +0100
To: Entertainment Licensing
Subject: Gambling Outlet Harehills Lane

To Whom it May Concern

I am writing to voice my objection to the former site of Gilchrist Bakery on Harehills Lane being turned into a gambling outlet. This type of establishment offers no tangible benefit whatsoever to the wider community. There is also a moral obligation to stop such businesses operating in this area. This is a low income area and there are already numerous gambling establishments in the vicinity. Enough is enough. I am also concerned that this will add to anti-social behaviour and crime in the area.

I urge you to visit our area and see for yourself that this is the exactly what isn't needed.
Please refuse this application.

Kind Regards,



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Sent from within the realms of possibility

From: [REDACTED]
Sent: 11 Aug 2020 14:52:13 +0100
To: Entertainment Licensing
Subject: Objection to 377-379 Harehills Lane - wMERKUR SLOTS

To Whom It May Concern

I am writing to strongly object to the above premises been turn into a Entertainment Outlet (aka MERKUR SLOTS)

I [REDACTED] I have been here since 1984
I am well respected in the community by local residents & surrounding areas & speak for many about our genuine concerns if this outlet is allowed to go a head.

OBJECTIONS AS FOLLOWS

1/ Anti Social Behaviour

2/ Noise Nuisance & disturbance

3/ Will encourage large groups to gather outside

4/Will effect other nearby business premises

5/ Will lower the tone in already Struggling area

6/Residential Area

7/Will encourage Crime & Problem Behaviour

8/Worsen the ongoing problem of anti social behaviour linked to existing gambling outlets causing more crime & increasing the fear of more crime in the area

I look forward to hearing from you shortly

Regards

[REDACTED]

[REDACTED]



From: [REDACTED]
Sent: 26 Aug 2020 17:16:10 +0100
To: Entertainment Licensing; Grahame, Cllr Ronald; Khan, Cllr Asghar; Ragan, Cllr
Denise; [REDACTED]
Subject: Objection to proposed licence for gambling premises Merkur Slots on Harehills Lane

Dear Sir/Madam

I want to object in the strongest terms possible to the proposed licencing of a gambling establishment (Merkur Slots) on Harehills Lane (replacing Gilchrist's Bakers). As a local resident for 20 years I believe that this would be detrimental to the wellbeing of our local community.

The data published by Leeds Observatory shows that our area is one of the most deprived in the UK, let alone Leeds. Harehills is also the ward in our city with the highest proportion of children and young people, many of whom already live below the poverty line and who would be at greater risk of neglect and deprivation if family members develop problem gambling habits.

Given that we have a high proportion of children and young people in our area a worrying national trend is that more children are developing problem gambling habits (A Gambling Commission study indicated that 450,000 children aged 11 to 16 bet regularly, more than those who have taken drugs, smoked or drunk alcohol and that the number of children classed as having a gambling problem has quadrupled to more than 50,000 in just two years - and this was prior to the impact of Covid). The problem is severe enough in Leeds that the NHS opened a gambling clinic for children in 2019. If this licence is allowed then the Council is providing yet another gambling business easy access to children to profiteer from, it seems that "Every Child Matters" unless they live in a poor area.

I would like to ask if Leeds City Council has conducted an Equality Impact Assessment before considering allowing this licence and draw your attention to the findings of

the research report Problem Gambling in Leeds (2016) a Leeds City Council commissioned study conducted by Leeds Beckett University. The Report identified that:

"there are some groups who are more likely to experience problems. At risk 'vulnerable' groups include:

- Younger people (including students)
- Adults living in constrained economic circumstances; particularly, those on very low incomes and benefits

- People from certain minority ethnic groups
- Homeless people and those living in areas of greater deprivation
- Adults with mental health issues and substance abuse/misuse disorders
- People with poorer intellectual functioning and learning disabilities
- Offenders and ex-offenders, (including those on probation and some custodial circumstances)
- Immigrants

The groups listed above are also more likely to be vulnerable to debt and other problems"

Kenyon, A et al (2016) p5

The proposed premises are near the boundary of two wards Gipton and Harehills and Burmantofts and Richmond Hill and data published by the Leeds Observatory shows that both these areas have a high proportion of most of the groups listed above.

In addition to the above reasons and in light of the current global pandemic and deepening national recession, I cannot understand why the Local Authority would even consider allowing yet another gambling outlet to open on Harehills Lane. At a time of record gambling addictions and the increase in numbers of domestic abuse incidents (There is an established link between domestic violence and problem gambling. As per 2016 report by the University of Lincoln

<https://www.lincoln.ac.uk/news/2016/09/1262.asp>) it seems to show reckless disregard for the welfare of our community.

I have copied in my local Councillors who were instrumental in setting up Money Buddies to tackle debt and deprivation and who actively support other anti-poverty strategies in our community, to see if they can do anything to prevent this licence being allowed. I also copy in my MP Hilary Benn to see if he can support his constituents in this matter.

Yours faithfully





From: [REDACTED]
Sent: 26 Aug 2020 18:06:39 +0100
To: Entertainment Licensing
Subject: Re: GPREM/BIN/00014/01 - Merkur Slots - Representation - [REDACTED]

Thank you for this guidance.

I live at [REDACTED], as previously stated.

This is on the street [REDACTED]. My children walk past the Gilchrists site on the way to and from their school bus. I am concerned that they will be encouraged to view gambling as an attractive and normal part of daily high street life.

regards



On Tue, 25 Aug 2020 at 17:43, Entertainment Licensing

<Entertainment.Licen@leeds.gov.uk> wrote:

Good Afternoon [REDACTED]

APPLICATION FOR A BINGO PREMISES LICENCE

MERKUR SLOTS, 377 - 379 HAREHILLS LANE, LEEDS, LS9 6AP

I acknowledge receipt of your representation to the application in respect of the above. Unfortunately, I am unable to validate your comments as they do not fall within the scope of the Gambling Act 2005 for a valid representation.

Please find below an extract from our guidance which details how to make a representation to a gambling application;

Who is able to make objections?

The Act allows certain individuals, and groups, to make representations about licensing applications. A representation is a reason why the application should not be granted in its current form, or should not be granted at all. Representations can be made in writing by an interested party or responsible authority.

An interested party is someone who:

- *lives sufficiently close to the premises to be likely to be affected by the authorised activities*
- *has business interests that might be affected by the authorised activities*
- *represents persons falling in the categories set out above e.g.*
 - *A trade body or residents association may make representations on behalf of local businesses or residents*
 - *A ward, town or parish councillor may also make representations.*

Upon receiving a representation, the first thing the council will do is determine if the representation has been made by either a responsible authority or an interested party.

On what grounds can I make a relevant representation?

Assuming you fulfil the criteria detailed in the previous section the council will accept your representation however the council must then decide if it is relevant. Generally in order to be relevant your objection should relate to one or more of the three licensing objectives of:

- *preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime;*

- *ensuring that gambling is conducted in a fair and open way; and*
- *protecting children and other vulnerable persons from being harmed or exploited by gambling.*

In addition you must ensure your representation is not vexatious, or frivolous. A frivolous representation is one which is not a serious representation. A vexatious representation is one which is made to annoy or upset the applicant and for no other purposes. The council is also unable to accept representations that would certainly not influence the determination of the application. Two items which the Act says the council must not consider and hence would certainly not influence the determination of the application are:

- *Whether there is demand for the proposed facilities*
- *Whether the proposal is likely to be permitted under the relevant planning and building legislation*

So a representation which says ‘we already have enough bingo halls/betting shops etc in the area’ would be one that the Licensing Authority would not take into account. A representation which says ‘this shop only has planning permission for use as a retail unit not as a betting shop’ would be one that the council would not take into account. Both of these things are matters which would certainly not influence the authority’s decision.

In summary the only representations that are likely to be relevant are those that:

o relate to the licensing objectives, or that raise issues contained in the council’s licensing policy statement, or in the Gambling Commission’s guidance or codes of practice and

o are not about planning or demand issues

o are not frivolous or vexatious.

Should you wish to make a further representation please ensure you provide details of your address so I can determine if you live sufficiently close and further detail how you believe the application will undermine the objectives no later than the 27th August 2020.

I have attached a copy of our guidance on making representations for your assistance and am hopeful that it will give you further information required.

If you have any questions or wish to discuss anything further please do not hesitate to contact me.

Regards

Matthew Nelson

Principal Licensing Officer

Entertainment Licensing

Leeds City Council

Tel: 0113 378 5029

email: matthew.nelson@leeds.gov.uk

www.leeds.gov.uk

From: [REDACTED]
Sent: 24 August 2020 11:46
To: Entertainment Licensing <Entertainment.Licen@leeds.gov.uk>
Subject: Objection to betting shop proposal for former Gilchrists site Harehills Lane

Dear Sir or Madam

I live at [REDACTED]

I would like to register my objection to plans to open a betting shop on the former Gilchrist's site on Harehills Lane.

I feel the area's gambling needs are already more than well-catered for with existing premises and with ready availability of online gambling.

I hold no particular moral objection to gambling, but would much prefer to see a greater diversity of shops/businesses in the local area.

Yours faithfully

[REDACTED]

[REDACTED]

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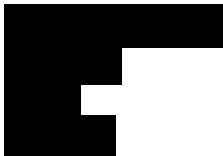
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regards



From: [REDACTED]
Sent: 26 Aug 2020 23:20:22 +0100
To: Entertainment Licensing; [REDACTED]
Cc: Arif, Cllr Salma; [REDACTED]
Subject: RE: GPREM/BIN/00014/01 - Merkur Slots - Representation - [REDACTED]
Importance: Normal

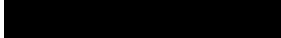
Dear Mr Neslon
Further to your request. My address is



My local High Street is Harehills Lane
The park I use is Harehills Park
My local Library is Compton Rd Library

All will be affected by the antisocial behaviour that a betting shop on the Gilchrists site would bring.

Yours sincerely



Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: Entertainment Licensing <Entertainment.Licen@leeds.gov.uk>

Date: 25/08/2020 15:30 (GMT+00:00)

To: [REDACTED]

Subject: RE: GPREM/BIN/00014/01 - Merkur Slots - Representation - [REDACTED]



Good Afternoon [REDACTED]

**APPLICATION FOR A BINGO PREMISES LICENCE
MERKUR SLOTS, 377 - 379 HAREHILLS LANE, LEEDS, LS9 6AP**

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Kind Regards

Matthew Nelson

Principal Licensing Officer

Entertainment Licensing

Leeds City Council

Tel: 0113 378 5029

email: matthew.nelson@leeds.gov.uk

www.leeds.gov.uk

From:

Sent: 21 August 2020 09:25

To: Entertainment Licensing <Entertainment.Licen@leeds.gov.uk>

Cc: Arif, Cllr Salma

Subject: Gilchrist Bakers turning into a Betting Shop

Re:

Local Residents & Business Outlets

Leeds City Council application to turn the premises of Gilchrist Bakers into an Gambling Outlet - once the bakery has moved to a new location (aka MERKUR SLOTS):
(HAREHILLS LANE)

To - entertainment.licensing@leeds.gov.uk

I am a local resident, and have lived in Harehills for just shy of 30 years. In the [REDACTED]. I am active within the community, volunteering to try and improve the declining infrastructure of the area and community cohesion.

Given the ongoing issues in Harehills I am utterly horrified that converting a once lovely family business into a betting shop, is even being contemplated. Harehills residents fought hard to get PSPO in place because of the devastating effect that the over saturation of alcohol outlets (70% of shops sell cheap booze in Harehills) and subsequent street drinking, predominantly outside existing betting outlets, has on this highly populated residential area.

There is no doubt that the existing betting shops in the area are a magnet for drinkers gathering to spend their days evening and nights in an antisocial drunken stupor. Those of us who live here have to run the daily gauntlet of passing through the crowds of drunk, lewd and crude drinkers who block the pavements outside the existing betting shops. At Bet Fred you can't get off the bus without being confronted by anti social behaviour or lewd comments. Women have to push their childrens prams onto the road to get past the gatherings outside the existing betting shops.

Harehills is not a wealthy area and has myriad social issues that local residents are battling to address. Gambling addictions are amongst those issues for people who struggle to maintain stability and are lured into making bets in the desperate hope of a life changing win. The reality is that the dream coming true is unlikely, and all betting does is further drag people into poverty and despair. And of course it is never just about the gambler, it is about the impact on their families too.

The area directly adjacent to the Gilchrist site, is the Bellbrooks area which has long had serious issues with anti social behaviour centred on the car parking space and streets behind Gilchrists. Adding a focal point of a gambling outlet in that immediate area would be the last thing long suffering local residents need.

The site is at a major Harehills crossroads that should be being developed as a flag ship, welcoming space for the area. The Compton Centre and a Childrens Nursery are on that crossroads. The Bellbrook Surgery is just behind the site and right next door is a school uniform shop, Harehills Park, one of few green spaces in Harehills is also accessed from that junction. It is not good that all the decent folk of Harehills, children and young people included, trying to use these public amenities, should now have to run the gauntlet of passing groups of lewd, drunken gamblers who will be attracted to that junction by any betting or licenced premises that is allowed to be there.

Much has been done to sort issues relating to anti social behaviour and the carpark facility behind Gichrists...it should be a parking area that encourages shoppers to come and park and then spend time shopping on Harehills Lane..something that would be beneficial to businesses and alleviate traffic flow issues with shoppers doing 'park and dash' all along the Lane. Having to walk from the carpark, through gatherd crowds of drunken gamblers to get to the shops, will not help this.

Please please please, I implore you...DO NOT LET HAREHILLS DOWN YET AGAIN with detrimental planning and licensing decisions that allow yet more betting shops or alcohol outlets in the area that we as local residents are trying so hard to improve.

That area has the potential and ground space, with a substantial area of tarmac much wider than any path, to be made into a lovely space that improves the environment of the area. If you allow this betting outlet, the space will be doomed to become another 24hr standing ground for drunks, a focus for yet more antisocial behaviour and the surrounding area will become an open latrine and litter dump. PLEASE DO NOT DO THIS TO AN ALREADY BELEAGUERED COMMUNITY.

Yours Faithfully



Sent from my Samsung Galaxy smartphone.

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From: [REDACTED]
Sent: 17 Aug 2020 14:20:12 +0100
To: Entertainment Licensing
Cc: Arif, Cllr Salma
Subject: Objection of a Gambling outlet to the Gilchrist bakers site
Importance: Normal

Dear Sir or Madam

I understand that Leeds City Council has received an application to turn the premises of Gilchrist Bakers

into an Gambling Outlet - once the bakery has moved to a new location (aka MERKUR SLOTS): (HAREHILLS LANE).

I understand that I have until the 27 August to raise this objection.

The reason for my objection is because I believe this will create yet more issues for the people of this area. We have put up with enough and this will only add to the negativity of Harehills.

Councillors please do not promote gambling in Harehills. There are many out there with gambling issues. And should we be encouraging those in debt to gamble. Also low paid workers. We also have enough Anti Social Behaviour issues too last us [REDACTED] a life time. Harehills deserves better.

Yours frustratingly

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 25 Aug 2020 10:37:03 +0100
To: Entertainment Licensing
Subject: FW: Objection to the application for gambling outlet in Harehills (Ref: GPREM/BIN/00014/01)

Morning, please find below a letter of representation relating to an on-going entertainment licensing application. It has been forwarded on to me by a ward councillor as I am dealing with a planning application for the change of use of these premises.

I'd be grateful if you could marry this representation up with the on-going license application. The resident will also have the ability to comment on the planning application (which has only recently been received and has not yet been publicised).

Any queries, please let me know.

Regards

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED]

Due to the exceptionally high volumes of work we are currently experiencing members of the East team may not always be able to process planning applications and enquiries, respond to emails and telephone calls as promptly as we would like in order to focus on our core work. Please accept our apologies for this and for any frustration and inconvenience this causes. We do understand that it is important that we deliver the best service we can and we will try and deal with your application and/or query as

promptly as we can. However, in light of the work pressures on the team we would be very grateful for your patience and understanding.

From: Grahame, Cllr Ronald
Sent: 25 August 2020 09:05
To: [REDACTED]
Subject: FW: Objection to the application for gambling outlet in Harehills

For the files [REDACTED]

From: [REDACTED]
Sent: 24 August 2020 15:56
To: Grahame, Cllr Ronald <[REDACTED]>
Subject: FW: Objection to the application for gambling outlet in Harehills

Sent from [Mail](#) for Windows 10

From: [REDACTED]
Sent: Monday, August 24, 2020 12:56:50 AM
To: [REDACTED]
Subject: Objection to the application for gambling outlet in Harehills

Good evening all

I understand an application has been made to Leeds city council for Gilchrist bakery Harehills Lane to become a bingo premises.

I ask for you to make a representation on my behalf of my strong objection to another gambling premise in Harehills. I am astounded that this is being considered. Harehills is one of the most deprived areas of Leeds as evidenced in the Leeds Observatory. So why is Harehills being considered as an appropriate place to have another gambling residence? This will only encourage individuals who are experiencing poverty and debt to part with their money in the hope of striking it rich which we know is not how the gambling industry works.

May I also draw your attention to the Research Report Problem Gambling in Leeds (2016) which Leeds City Council commissioned Leeds Beckett University to conduct a study into the prevalence of problem gambling and identified that the

"there are some groups who are more likely to experience problems. At risk 'vulnerable' groups include:

- Younger people (including students)
- Adults living in constrained economic circumstances; particularly, those on very low incomes and benefits
- People from certain minority ethnic groups
- Homeless people and those living in areas of greater deprivation
- Adults with mental health issues and substance abuse/misuse disorders
- People with poorer intellectual functioning and learning disabilities
- Offenders and ex-offenders, (including those on probation and some custodial circumstances)
- Immigrants

The groups listed above are also more likely to be vulnerable to debt and other problems"

Kenyon, A et al (2016) p5

Gipton and Harehills has a high proportion of some of these vulnerable groups so why would gambling premises be considered for this area? Harehills has significant problems with alcohol and substance misuse, child poverty/low income families, one of the most deprived areas in Leeds all of which are challenging for those experiencing these issues and for other residents of Harehills. Resources and support networks are already at breaking point therefore I strongly object to adding another problem to the area and one that will not bring about positive change to the community.

I look forward to hearing from you

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]



From: [REDACTED]
Sent: 20 Aug 2020 15:26:53 +0100
To: Entertainment Licensing
Subject: RE: GPREM/BIN/00014/01 - Merkur Slots - Representation -
[REDACTED]

Yes apologies. I am resident at [REDACTED]
[REDACTED]

Thank you

[Sent from Yahoo Mail on Android](#)

On Thu, 20 Aug 2020 at 11:05, Entertainment Licensing
<Entertainment.Licen@leeds.gov.uk> wrote:

APPLICATION FOR A BINGO PREMISES LICENCE

MERKUR SLOTS, 377 - 379 HAREHILLS LANE, LEEDS, LS9 6AP

I acknowledge receipt of your representation to the application in respect of the above unfortunately I am unable to validate your comments as you have not provided an address so I am unable to define if you live sufficiently close to be affected. Please find below an extract from our guidance which details how to make a representation to a gambling application;

Who is able to make objections?

The Act allows certain individuals, and groups, to make representations about licensing applications. A representation is a reason why the application should not be granted in its current form, or should not be granted at all. Representations can be made in writing by an interested party or responsible authority.

An interested party is someone who:

- *lives sufficiently close to the premises to be likely to be affected by the authorised activities*
- *has business interests that might be affected by the authorised activities*
- *represents persons falling in the categories set out above e.g.*
 - *A trade body or residents association may make representations on behalf of local businesses or residents*
 - *A ward, town or parish councillor may also make representations.*

Upon receiving a representation, the first thing the council will do is determine if the representation has been made by either a responsible authority or an interested party.

On what grounds can I make a relevant representation?

Assuming you fulfil the criteria detailed in the previous section the council will accept your representation however the council must then decide if it is relevant. Generally in order to be relevant your objection should relate to one or more of the three licensing objectives of:

- *preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime;*
- *ensuring that gambling is conducted in a fair and open way; and*
- *protecting children and other vulnerable persons from being harmed or exploited by gambling.*

In addition you must ensure your representation is not vexatious, or frivolous. A frivolous representation is one which is not a serious representation. A vexatious representation is one which is made to annoy or upset the applicant and for no other purposes. The council is also unable to accept representations that would certainly not influence the

determination of the application. Two items which the Act says the council must not consider and hence would certainly not influence the determination of the application are:

- *Whether there is demand for the proposed facilities*
- *Whether the proposal is likely to be permitted under the relevant planning and building legislation*

So a representation which says 'we already have enough bingo halls/betting shops etc in the area' would be one that the Licensing Authority would not take into account. A representation which says 'this shop only has planning permission for use as a retail unit not as a betting shop' would be one that the council would not take into account. Both of these things are matters which would certainly not influence the authority's decision.

In summary the only representations that are likely to be relevant are those that:

o relate to the licensing objectives, or that raise issues contained in the council's licensing policy statement, or in the Gambling Commission's guidance or codes of practice and

o are not about planning or demand issues

o are not frivolous or vexatious.

If you could provide me with your address I will be able to determine the validity of your representation. Please ensure you do so no later than the 27th August 2020.

I have attached a copy of our guidance on making representations for your assistance and am hopeful that it will give you further information required.

If you have any questions or wish to discuss anything further please do not hesitate to contact me.

Kind Regards

Mrs Victoria Radford
Licensing Officer
Entertainment Licensing
Tel: 0113 378 5029
victoria.radford@leeds.gov.uk
www.leeds.gov.uk

Please note my working days are Tuesday, Wednesday and Thursday.

www.leeds.gov.uk

From: [REDACTED]
Sent: 11 August 2020 16:00
To: Entertainment Licensing <Entertainment.Licen@leeds.gov.uk>
Subject: Merkur Slots (Harehills Lane)

Hello

It has come to my attention that the Council have received an application to turn the empty premises of Gilchrist Bakers on Harehills Lane into a Gambling Outlet.

I am emailing today to object to this. I urge the council to refuse this application as you will already know that we have a 24hour off licence only a few doors away and this has already increased anti- social behaviour in the area and I believe this will not only increase anti-social behaviour but also crime.

It is already very bad in this area.

We have a group of youths out until the early hours of the morning gathered around harehills lane near the bakery without any authority doing anything about it.

So, as a resident, I am urging you to please refuse this application.

Thank you



Sent from [Mail](#) for Windows 10

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From: [REDACTED]
Sent: 22 Aug 2020 11:24:49 +0100
To: Entertainment Licensing
Cc: Salma Arif, [REDACTED]
Subject: re the potential licensing of the previous Gilchrist bakery on Harehills Lane for a gambling outlet

Dear Licensing,

I am emailing to state my objection to the premises that was Gilchrist bakery becoming yet another gambling outlet.

Harehills is already more than adequately resourced with these, especially compared to areas like Oakwood and Chapel Allerton which benefit from a much better reputation, High levels of gambling outlets add to the reputation of Harehills being a crime ridden poverty stricken area, and many of us are working hard to change this. I believe this would set us back and add to any existing problems. I believe gambling outlets thrive in areas like ours as they feed into people's hopes for a quick rise out of poverty, whilst frequently putting people at risk of becoming addicted and sending families further into poverty.

As a long term resident with a child, my priority is to see poverty and it's associated issues eradicated in our area and it become a safe place for families to live and thrive. I do not believe another gambling outlet will help us achieve this goal,
yours sincerely

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 11 Aug 2020 20:28:29 +0100
To: Entertainment Licensing
Cc: [REDACTED]
Subject: Former Gilchrist Bakery Harehills Lane

Good evening

I am writing to object to this building being turned into a slot gambling business, due to the already high number of gambling/betting shops in the area. There are also a lot of establishments selling alcohol and there is the potential for anti social behaviour in an area that can ill afford it.

I live on [REDACTED], just around the corner from the proposed business and I am also a business owner in nearby Chapeltown.

Turning a family bakery into a gambling establishment would further run the neighborhood down. There is already a problem with street drinking and this would ultimately make things worse for residents who are trying to improve the area.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Sent from my One Plus mobile

From: [REDACTED]

Sent: 26 Aug 2020 15:11:56 +0100

To: Entertainment Licensing;Grahame, Cllr Ronald;Ragan, Cllr Denise;Khan, Cllr Asghar

Subject: Application for gambling establishment on Harehills Lane

To whom it may concern,

Please accept this email as a record of my opposition to the proposal that the site of the former Gilchrist bakery be turned into a gambling establishment. With some of the highest rates of anti-social behaviour and criminality associated with poverty and deprivation, I believe that establishing another gambling establishment in the community will only exacerbate these problems. Harehills Lane is not in need of a betting shop or similar establishment as there are already several further down Harehills Lane. The social problems connected with gambling are well known and I struggle to think of a positive impact for people living locally if this goes ahead.

Losing Gilchrist is a real shame and I understand that the need to ensure that the premises doesn't remain empty is a pressure, however, whilst in the short term this proposal eliminates a problem, in the long term it creates a much bigger one.

I look forward to hearing what happens with this application.

Kind regards,

[REDACTED]