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27th January 2022

**Entertainment Licensing Section,  
Leeds City Council,  
Civic Hall,  
Leeds,  
LS1 1UR**

cc. **Tony Clarke, Licensing Consultant, JMC Licensing, 540 Antrim Road, Belfast, BT15 5GJ**

**RE: Armley Food Centre, 28-30 Town Street, Armley, Leeds, LS12 3AB**

**APPLICATION TO VARY PREMISES LICENCE – LICENSING ACT 2003:  
POLICE – LETTER OF REPRESENTATION – “FULL” OBJECTION – ARMLEY CIA**

West Yorkshire Police received an application for a premises licence for the above premises on 12<sup>th</sup> January 2022.

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

West Yorkshire Police make representations to the application based on the cumulative impact assessment (CIA) for Armley and breaches of the premises licence in general during visits made by West Yorkshire Police in July and December 2021 resulting in a lack of confidence in how the premises is run.

The full details of the Armley CIA can be found within the current '2019-2023 Statement of Licensing Policy' of Leeds City Council, from paragraphs 7.24 to 7.26. In 2016 Armley was identified as an area suffering from antisocial behaviour displayed by groups of men standing and drinking in the street. It could be reasonably expected that these people were drinking alcohol purchased on Town Street and so

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the CIA was implemented covering Armley Town Street, Branch Road and the surrounding streets and only related to off licences.

This application, in terms of the proposed measures and the conducting of licensable activities in order to promote the licensing objectives, is essentially no different when compared to any of the other existing licensed premises upon which the Armley CIA was founded.

The application mirrors in most respects what is already allowed with existing licensed premises in the area concerned and which initially brought about the problems associated with the Armley area and the subsequent implementation of the Armley CIA.

In other words, an application to supply alcohol for consumption 'off' the premises only, for the hours applied for, every day 0900-0100 hrs, offering an array of CCTV conditions, other recognisable measures offered as conditions of the licence to promote the licensing objectives.

In this case, this application provides nothing fundamentally different to what already applies to licensed premises in this area which are essentially responsible for the problems of disorder and anti-social behaviour associated within the area of the Armley CIA.

Further and probably most importantly in a case like this, the applicant has hardly addressed what is required in making an application in an area of this nature as identified in the following paragraphs of the current 'Statement of Licensing Policy', specifically in relation to the Armley CIA:-

- Paragraph 7.24 of the policy identifies that the area is suffering from the cumulative impact of off licences leading to problems undermining the licensing objectives.
- Paragraph 7.25 of the policy refers to drinkers causing problems of anti-social behaviour purchasing alcohol on Town Street and neighbouring streets and then remaining in the area to drink it.
- Paragraph 7.26 of the policy specifically in relation to the Armley CIA– 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 of alcohol at any time..
- Paragraph 7.33 and 7.34 of the policy –The applicant has failed to demonstrate how the premises will not add to the cumulative impact of premises in the area and has not identified any steps to combat the issues. In fact, the applicant has made no reference at all to the CIA and the issues the area is experiencing despite the fact that the premises already trades in the area.

Breaches of the licence came to light in July 2021 following a visit by West Yorkshire Police. Many of these breaches were not rectified by December 2021. A further visit the following week showed that some breaches had been partially rectified but not all. West Yorkshire Police, at this present moment in time, do not have the confidence that the current management take their responsibilities seriously.

It should also be noted in the application form from the applicant that many of the conditions they offer as a "plus" are already contained in the current premises licence namely:-

1.1 The premises shall install and maintain a digital CCTV system

1.2 The CCTV system shall have sufficient hard drive storage capacity to store a minimum of 31 days.

1.6 Only nominated staff shall be trained in the operation of the CCTV system to ensure rapid data retrieval & downloads of footage can be provided to the Police & the Local Authority Officer upon reasonable request in accordance with the Data Protection Act. (very similar wording already on the licence).

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1.7 CCTV shall be continually recording during licensable hours

1.9. A written alcohol register will be maintained at the premises to record those persons authorised to sell alcohol under the premises licence (very similar wording already on the licence).

3. When the designated premises supervisor is not on duty, a contact telephone number will be available at all times (very similar wording already on the licence)

9. Challenge 25

This leads West Yorkshire Police to believe that they really do not understand their licence or have any idea of what the conditions currently listed on it are.

Therefore, in these circumstances, West Yorkshire Police has no alternative but to ask a presiding sub-committee at a forthcoming hearing concerning this application, to refer to paragraph 7.64 of the 'Statement of Licensing Policy' and refuse it outright.

Sarah Blenkhorn  
Leeds District Licensing Officer  
West Yorkshire Police

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