

Interested Party Representation (Form IPR1)



Section 1 – Licence application details

Please indicate as appropriate :

I wish to object to the following application:

I wish to support the following application:

Applicant premises name and address: Indigo, 81 Roundhay Road, Leeds, LS8 5AQ

Section 2 – Your personal details

NB : If you are acting as a representative, please go to Section 3.

Title	Mr Mrs Miss Other_____
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Surname	Elbers
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First name(s)	Cornelia
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Address (incl postcode):

Leeds City Council, Public Health (Healthy Living Team), [REDACTED]

Please note that a full copy of your representation (including your name and address) will be sent to the applicant and will be a public document at any hearing of this matter.

Please refer to our Guidance Note – GN-M Guidance on making representations for further information and alternative options.

Section 3 – Representative details

If you are representing someone else please complete details below

Name of Representative/ Organisation	N/A
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Full postal address (incl postcode)	N/A
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Please indicate capacity :

Representative of Residents Association
MP

Ward Councillor
Trade Association

Parish Council
Other (please specify)

Section 4 – Representation grounds

The representation is relevant to one or more of the following licensing objectives:

Please tick relevant box(es)

Prevention of crime and disorder	X
Prevention of public nuisance	X
Protection of children from harm	X
Public safety	X

Please select:

I object to the application being granted at all

I object to the application being granted in its current form*

*If you choose this option, remember to tell us in the next section what changes you would prefer to see.

The grounds of the representation is based on the following:

I would like to strongly object to this license on the following grounds.

After two years of the coronavirus pandemic, levels of alcohol consumption and alcohol harms have increased across Leeds and they have disproportionately affected areas of multiple deprivation such as Harehills. Much work has successfully been undertaken by Ward Councillors, the Police and the Council's Safer Stronger Communities Team to make Harehills a more attractive and safer (retail) area. Their success in reducing street drinking and crime levels will be significantly undermined by yet another retail outlet selling cheap alcohol 24/7.

Whilst the proposed location of the premises does not fall inside the Harehills Cumulative Impact Policy (CIP) area, there is still strong evidence to suggest that another 24-hour off-license will exacerbate existing challenges in the surrounding neighbourhoods.

The Council's Public Health Intelligence, Healthy Living, and Licensing Teams have developed an Alcohol Licensing Data Matrix which was recently updated. The Data Matrix aims to identify high risk applications from a Public Health perspective. The postcode of the proposed premises is entered into the Data Matrix – as well as the neighbouring area (as the premises are on the periphery), in this case the Bayswaters area. A RAG rating is then used to flag up potential risk of applications to contribute to alcohol related harm in local area.

In addition to statistics, I have also included two statements from local stakeholders who work in the area: a GP Partner from Chapeltown Health Centre, which is located round the corner from the proposed premises, and from GIPSIL, a third sector agency just up the road from the proposed premises, which works with vulnerable young people in the area.

➤ **Prevention of Crime and Disorder.**

The Harehills North MSOA already has a high number of off-license premises; the area across the road has a very high number of these outlets. Therefore, yet another 24-hour license granted in an alcohol saturated area will provide another easily accessible portal for cheap strong alcohol consumption which is strongly correlated with alcohol-related crime and disorder.

The Alcohol Data Matrix confirms that numbers of "violent crime where alcohol flagged" and "drunk and disorderly" offences are already high in Harehills North. In the area that includes the Bayswaters across the road, these numbers are even higher – respectively the 3rd and 4th highest in Leeds, out of 107 MSOAs (middle super output areas). Furthermore, cases of "alcohol-related anti-social behaviour" were very high in the area.

➤ **Prevention of public nuisance.**

The issue of street drinking has been a long-standing issue in the Gipton and Harehills ward. The availability of yet another outlet selling cheap high strength alcohol, at all hours of the day, will contribute to these challenges in the area. Whilst pro-active work has been undertaken by Police, the third sector (Touchstone) and the Council, this is primarily around the Harehills Lane area. The proposed location of these premises is only a 15-minute walk away from the area which is a “street drinking hotspot” and evidence from Harehills Lane shows that people will congregate where cheap alcohol is available which makes it highly likely this behaviour will replicate in the Harehills North area.

As stated under ‘Prevention of Crime and Disorder’ above, the offences for “drunk and disorderly” behaviour are already high in this area and in the area across the road from the proposed premises they are the 4th highest in Leeds. In addition, there will be noise from emergency services as “ambulance call-outs related to alcohol” are the 4th highest in Leeds here.

➤ **Protection of Children from Harm.**

The Harehills North MSOA has a higher than average number of children and young people living in the area, it is the 2nd highest in Leeds for “Population aged 16 or under”. The proliferation of establishments selling cheap alcohol and residents suffering from alcohol dependency normalises the situation for children and as they grow older it almost sets the benchmark for what is normal in their area. We know from peer-reviewed evidence such an environment can have a strong influence on impressionable children in low income neighbourhoods and can create low aspiration amongst this peer group.

The Data Matrix confirms that the numbers of NEET (not in education or training) in this area is the 2nd highest in Leeds. Furthermore, the numbers of Looked After Children in the area are the 4th highest in Leeds. We know that these young people are extremely vulnerable and more likely be/become dependent drinkers.

GIPSIL, a third sector agency working with vulnerable young people in the area, has provided us with the following statement which outlines why they object to yet another 24-hour off-license in the area:

GIPSIL, including our remit as lead partner in the Our Way Leeds young persons’ housing support contract, have grave concerns in respect of the application for a licence for the sale of alcohol over an ongoing 24 hour period in respect of a store along Roundhay Road in the Harehills area. There are a number of young, vulnerable people living independently in this area, including those living in our established emergency accommodation provision. These are generally young people living on means tested, subsistence level benefits without extended family or community support networks. As such, they have additional vulnerability to exploitation from others as well as frequently living chaotic lives. Our concerns relate to the potential for financial exploitation of young people in the area given the increased availability of alcohol in the immediate area over a 24 hour period, the potential for increased risk taking behaviours for young people using alcohol and for their exposure to other people attracted to the area as a result of the accessibility of alcohol over a full 24 hour period.

➤ **Public safety**

The safety of local residents will be negatively impacted by another 24-hour off-license in their neighbourhood. The statistics outlined above, in relation to anti-social and drunk and disorderly behaviour are testament to this. The safety in terms of health and wellbeing of residents will also be affected. The area across the road from the proposed premises already has the 4th highest number of “alcohol-related emergency hospital admissions” and the 7th highest number in “alcohol treatment” out of 107 MSOAs in Leeds.

Dr Hasantha Jayasinghe from the Chapeltown Health Centre, the GP practice around the corner from the proposed premises, has provided us with a statement which explains why he is highly concerned about this application:

As a GP working in Chapeltown for the last 15 years I’ve sadly seen the ruinous effects of

problem drinking. People get sort of hollowed out, most everything becomes subservient to alcohol. People often can't work and come asking for fit notes. They often beg for detox but there's so few places this not an easy ask. People's livers fail and the toxic effect of constant alcohol misuse leads to brain damage. In hospital I've seen how people with long term alcohol misuse die, abdomens bloated with ascites needing repeat taping to allow them to breathe.

One of the biggest hurdles for people who are trying to escape the path they find themselves on is the ready availability of alcohol. Often cheap deals almost everywhere from petrol station supermarkets to corner shops. This becomes particularly acute during holidays where cheap promotions are especially prevalent. We all know will power is a finite resource and resisting the chocolate biscuit with your tea means you won't resist the pudding after dinner. Trying to resist temptation therefore is a constant struggle so the idea of having somewhere to go late at night when peoples will power is more or less zero I would say is not taking the danger this poses to problem drinkers sufficiently into account.

Sadly areas like Chapeltown and Harehills has greater levels of problem drinkers than more affluent areas. It feels like opening a 24-hour off license is taking cynical advantage of this fact.

In conclusion, to approve this application would be irresponsible and cause harm to our most vulnerable residents, not just adults but in particular children. Despite the proposed premises falling outside the Harehills Cumulative Impact Policy (CIP) area, there is compelling evidence (both quantitative and qualitative) that yet another 24-hour off-license will exacerbate the problems that already exist in the area.

You need to complete this box as fully as possible. If you do not the Licensing Authority may not be able to assess the relevance of your representation.

Please attach supporting documents/further pages as necessary – please number all additional pages.

Try to be as specific as possible and give examples, e.g., on 1 February I could hear loud music from the premises between 10pm and 1am. I am concerned that if the premises open until 2am this will cause a nuisance to me and other residents of the street.

Signed: 

Date: 11th March 2022