



**Elections and Regulatory Services**

Civic Hall  
Leeds LS1 1UR

**Private & Confidential**

Ruslanas Zirnikas  
Lietuvaite Shop Ltd  
15 Branch Road  
Armley  
LS12 3AQ  
By email: [REDACTED]

Contact: Susan Duckworth

Tel: [REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

Your ref:

15<sup>th</sup> March 2022

Dear Mr Zirnikas

**Lietuvaite, 15 Branch Road, Armley, Leeds, LS12 3AQ  
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.

The area in which the subject premises is in a cumulative impact area. Specifically, your application falls within the cumulative impact area of Armley as described in the Statement of Licensing Policy at paragraphs 7.24 to 7.26 which states:

7.24 The council has assessed anti-social behaviour and crime statistics for the area known as Armley 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. Specifically, Town Street and Branch Road are the areas affected. Maps showing the exact geographical area included in this area can be found in the cumulative impact assessment.

7.25 In this area the nature of the problems are predominantly anti-social behaviour perpetrated by people purchasing alcohol on Town Street and Branch Road and then remaining in the area to drink it. More information on the evidence can be found in the cumulative impact assessment.

7.26 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.

I refer you to the council's Cumulative Impact Assessment for Armley (pages 44 – 55) for further information.

I refer you to 7.32 to 7.39 of the Policy which describes how applications for premises situated within a designated cumulative impact area for new premises licences or variations that are



likely to add to the existing cumulative impact will normally be refused and it is for the applicant to demonstrate that their application would not add to the cumulative impact.

I note that your application is for a small supermarket, adding the sale of alcohol for consumption off the premises from 10am to 10pm every day. You have offered CCTV, staff training on public safety, notice at the entrance asking customers to leave quietly, litter bins, Challenge 25 and a refusals register. I also note that apart from moving the operating hours back by one hour, this application is almost identical to the one refused by a licensing subcommittee at the start of 2021.

Your application does not refer to how you will address the problems being experienced on Armley Town Street which are clearly described in the Statement of Licensing Policy in the excerpt above and in further detail in the Cumulative Impact Assessment.

Specifically, I would refer you to the Cumulative Impact Assessment (CIA) where it describes that Armley has been an area of concern since 2014. In 2018, despite the local community, MP and ward members, the council's Communities team, public health, the neighbourhood policing team and Leeds Antisocial behaviour Team working together to address issues around street drinking, groups gathering and intimidation of people using their local high street, the council included Armley as a cumulative impact area. The CIA states:

"In the last few years residents have reported to the local councillors and MP their concerns about large groups of mostly male street drinkers gathering on Town Street. Residents find this intimidating and have reported feeling that this area is becoming a no-go zone. West Yorkshire Police, Leeds Antisocial Behaviour Team and the council are working with these two groups to stop the antisocial behaviour and have issued injunctions to stop a number of people from coming back to Town Street. In the cumulative impact area, by the end of 2016, there were a total of 12 premises licensed to sell alcohol for consumption off the premises (convenience stores, mini-markets and off licences) and 6 premises licensed to sell alcohol for consumption on the premises (pubs, bars and clubs). At the same time licensed premises have increased reports of antisocial behaviour, disorder and domestic violence have also increased in the wider Armley area.

In areas where there is an excessive accumulation of on-licensed premises, it is easy to provide a direct correlation between those premises and crime and disorder in the area, through an analysis of the operating hours of the premises and the peak times for incidents and calls for service. It is harder to provide a direct correlation between the accumulation of off licensed premises and disorder in the same way as people are not drinking on the premises where they purchased the alcohol, and may delay drinking the alcohol until they arrive at home. However in this area there is an issue with people drinking on the street and causing disorder and anti-social behaviour issues. West Yorkshire Police have identified that smaller independently owned off licences in the area are selling strong and cheap alcohol popular with street drinkers as they are finding bottles and cans as litter that are only available in certain shops. However as the shops aren't committing any offences selling these products they would not be subject to enforcement action.

Common sense would denote that new off licensed premises opening in the area where street drinking and the associated anti-social behaviour is most problematic would add to the problems already being experienced in the area and this view is supported by officers from LASBT and West Yorkshire Police."

I also refer you to 7.38 of the Statement of Licensing Policy which describes examples of factors the licensing authority will not consider as meeting the standard of rebuttal include:

- That the premises will be well managed and run as all licensed premises should meet this standard.
- That the premises will be constructed to a high standard.
- That the applicant operates similar premises elsewhere, such as in another licensing authority area, without complaint.

### Alcohol Licensing Data Matrix

Since your last application, the council's Alcohol Licensing Data Matrix has been updated. A [MSOA](#) is a geographic area designed to improve the reporting of small area statistics in England and Wales. MSOAs are built from groups of contiguous LSOAs. The minimum population is 5000 and the mean is 7200. The Organisation Data Service publish files created on their behalf by the Office for National Statistics, which link postcodes to the Middle Layer Super Output Area. This enables the Matrix user to input a postcode, for this to be linked to a MSOA and the data for that MSOA to be ranked against all other areas in Leeds.

By entering the postcode for the premises the matrix displays the ranking of this MSOA against certain data sets. This allows responsible authorities and the licensing authority to establish the problems being experienced in the MSOA. The Matrix also provides an overall ranking against all 107 MSOA areas in Leeds.

The matrix has rated the MSOA concerned as **very high (top 3%)**. It is ranked 2<sup>nd</sup> highest out of 107 MSOAs. for potential alcohol related harm.

The following indicators have 'very high' ratings for potential related harm:

- |   |                 |
|---|-----------------|
| • Deprivation                                       | 7 <sup>th</sup> |
| • Children not in education, employment or training | 9 <sup>th</sup> |
| • Alcohol specific emergency admission count        | 1 <sup>st</sup> |
| • Off licence premises count                        | 2 <sup>nd</sup> |
| • Alcohol related harm hospital stays               | 5 <sup>th</sup> |
| • Antisocial behaviour – alcohol related            | 2 <sup>nd</sup> |
| • Violent crime where alcohol flagged               | 5 <sup>th</sup> |
| • Drunk and disorderly                              | 3 <sup>rd</sup> |
| • Alcohol treatment                                 | 1 <sup>st</sup> |
| • Ambulance callouts related to alcohol             | 2 <sup>nd</sup> |

And 'high' ratings for the following:

- |  |                  |
|--|------------------|
| • Population aged 16 and under                         | 14 <sup>th</sup> |
| • Children not achieving English and Maths strong pass | 23 <sup>rd</sup> |
| • Looked after children                                | 12 <sup>th</sup> |
| • On licence premises count                            | 18 <sup>th</sup> |
| • Licensing risk score                                 | 19 <sup>th</sup> |
| • Audit scoring 16 or more (higher risk)               | 10 <sup>th</sup> |
| • Stroke emergency hospital admissions                 | 16 <sup>th</sup> |

These data points towards an area with both adults and children suffering from alcohol related harm, whether that be directly or indirectly.

Bearing in mind the severity of the problems being experienced in the area, with this area suffering from issues with people drinking on the street and causing disorder and anti-social behaviour issues, the 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. In fact as the problems in this area are so severe, it is hard to envisage how any business selling alcohol for consumption off the premises can mitigate these concerns.

Therefore the licensing authority submits a formal representation to your application on the grounds of the prevention of crime and disorder, public safety and public nuisance and will recommend to the licensing sub-committee that this application is refused.

Should you have any questions, please contact us.

Yours faithfully



Susan Duckworth  
Principal Licensing Officer  
Entertainment Licensing