## 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 name (if known): Unknown
Applicant premises name and address: Booze Plus, 33 Tong Road, Farnley, Leeds, LS12 1LZ

## Section 2 - Your personal details

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

| Title | Mr Mrs Miss Other_ |
| :--- | :--- |
| Surname | Hindley |
| First name(s) | Jonathan |

Address (incl postcode):
Leeds City Council Public Health Locality \& Primary Care team, $4^{\text {th }}$ Floor-West, 110 Merrion House, Leeds, LS2 8BB

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/ <br> Organisation | N/A |
| :--- | :--- |
| Full postal address <br> (incl postcode) | N/A |

Please indicate capacity:
Representative of Residents Association Ward Councillor MP 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.
$>$ Prevention of Crime and Disorder. I feel yet another license granted in a completely alcohol saturated ward which is extremely close to an area which currently falls under the licensing authority cumulative impact policy will provide easily accessible portal for cheap strong alcohol which can lead to drunken and disorderly behavior. If you consult the attached Armley alcohol matrix you will see the neighborhood and relevant geographical super output area is in the extremely high-risk category especially in admissions to accident and emergency wards due to alcohol related harm and some subsequent disorderly behavior resulting in injury. I believe you are familiar with the matrix however if not there are explanatory notes on the alcohol harm matrix at the bottom of this page and an example for this specific location. This Lower Super Output Area has a high-risk rating of $88 \%$ to $97 \%$ of all LSOA. The area has a high deprivation score, a large volume of admissions to Leeds Accident and Emergency Unit for alcohol related harm and injury and a high density of off licenses within this specific geographical area.
> Prevention of public nuisance. In April 2021 LCC Public Health officers were talking to residents in the area, including the surrounding high rise social housing. This was in relation to promoting local Covid-19 Pop Up testing and vaccination provision. Whilst we undertake these duties, we also do a general health and wellbeing check and collect feedback. A significant number of residents mentioned groups of inebriated men and sometimes teenager boys late at night outside the parade of shops adjacent to new Wortley Community Centre causing a nuisance by shouting, occasionally playing loud and aggressive music on their phones and it is feeling very intimidating. A couple of collected comments were,

- "Don't go down at night, it's either young lads swearing or drunk men urinating at the back of the shops"
- "So much booze about here mate, kids can get it 24/7 normal for 'em no wonder we have so much bad behavior, feel sorry for the Police trying to keep a lid on it"
$>$ Protection of Children from Harm. As a council public health officer and parent, I feel this proliferation of establishments selling cheap and strong alcohol and the subsequent proliferation of street drinkers and residents suffering from alcohol addiction it normalizes the situation for children and as they grow older it almost sets the benchmark of what is normal in this area. We know from much peer reviewed evidence such an environment can have a strong influence on impressionable children in a deprived neighborhood and can create low aspiration amongst this peer group. On a youth project six years ago a young adolescent boy was asked what he wanted to do in his life and his reply was.
- "Stay in drink cans of larger and play games like my dad"

We know from over twenty plus years of community development work that there are families in the surrounding housing suffering from alcohol addiction and within these family units are children exposed to the environment the supply of cheap strong alcohol only increases the temptation and exasperates the problem. One dad brought his children to a family project away from the ward as a form of escape for himself and children as part of a 'Stronger families' partnership project to get away from the area. I spoke to him on the early evening project, and he stated.

- "Listen mate I bring my kids and me down here because the wife's an alcoholic and it's a break for all of us. She can get booze anywhere, at any time in Armley and New Wortley, you see them walking around going from 'offy' to 'offy' p\%ss@\# up, what chance they got, I worry for my kids mate."
$>$ Public safety-there is a strong perception from residents that it is not safe to go out after a certain time which is very sad as it deprives them of access to vital local amenities and vital social interaction if they live alone.
- I stand in unison with colleagues in the council, the Police, elected members with local businesses and with residents in saying Armley and New Wortley does not need any further alcohol outlets.
- The simple fact is Armley is already saturated with businesses selling alcohol.
- To put this in context, within the surrounding area many of shops sell alcohol. Alcohol that is both cheap and strong. A potent mix.
- This in a neighborhood that has residents facing some of the most serve social and economic challenges in the UK; complex challenges that have been exacerbated by the Covid-19 pandemic.
- The Telegraph reported that the pandemic has seen problem drinking double in the UK since lockdown was introduced: https://www.telegraph.co.uk/family/life/boozy-britain-nation-drank-lockdown/
- We are seeing the consequences of this locally, as a hardcode group of street drinkers are a regular presence in Armley, and whilst we recognize this is a vulnerable group of individuals, the consequences to the wider community are manifesting itself in daily anti-social behavior, littering and on occasions violence. There are also limited funds available to local services who are responsible for treating and reducing harm in this cohort and this puts a strain on services and more service users could go untreated and be left to return to anti-social behavior and street drinking. We se bench drinkers outside the New Wortley parade of shops constantly.
- All this is happening in a densely populated area that has a huge volume of families with young children.
- Can it be right that residents have to put up with this constant "hangover" on their doorstep's day after day?
- Imagine the empty cans, the smell of urine and sight of human excrement and broken glass greeting you as you walk to school? This can be the reality for residents in Armley. In New Wortley its litter, inebriated men urinating behind the parade of shops and sometimes in plain sight. There have been incidents of drunk, homeless men sleeping their hangovers in the local church grounds.
- To try to address this in the last few years authorities have introduced a Cumulative Impact Policy (CIP), the legislation which seeks to offset the devastating impacts of problem drinking in the area. This application does not fall into that zone but it is very close buy.
- To approve this application to increase trading hours would be irresponsible and cause harm to our most vulnerable residents.
- It would also contradict all the hard work by the Police, Council, Cllrs, partners, and most importantly residents who are exhausting themselves to make their area safer and a more pleasant place to live.
- The forensic testimonies from residents who also represent local business and residents' associations illustrate just how deep this opposition goes.
- The application falls extremely close to a CIP area, in the heart of a residential area, and we would urge the licensing committee to refuse this application considering representations submitted. Remembering that the Alcohol Harm Matrix score is High. It is difficult to know how the business would mitigate against this potential for harm when increasing the access to cheap and strong alcohol many vulnerable residents will have access to.

Explanation of Alcohol Harm matrix

## Alcohol Licensing Data Matrix

A LSOA is Lower Layer Super Output Areas are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. Public Health have produced and maintain a licensing matrix which rank LSOAs (lower-level super output area) against each other. The Licensing Authority has used this Matrix when
undertaking the cumulative impact assessment for this area.

By entering postcodes, the matrix displays the ranking of this postcodes LSOA against certain data sets. This allows responsible authorities and the licensing authority to establish the problems being experienced in the LSOA.

This map shows the Armley area. Dark red denotes the 15 highest ranked LSOAs, followed by dark orange, light orange and green being the lowest ranked LSOAs.


Alcohol harm model.
Parameters cannot be adjusted in this version.


The pandemic has undoubtedly impacted on this extremely poor population in a priority neighborhood in terms of economic decline adding increased cheap and strong alcohol to an already poor and beleaguered community with high clinical rankings of low mood, anxiety and depression is irresponsible and will be detrimental to child development, family life and public order.

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 2 am this will cause a nuisance to me and other residents of the street.

Signed:
Date:

## Licensing Act 2003 Notice of Hearing relating to Booze Plus, 33 Tong Road Leeds LS12 1HQ

Supplementary information that would have been presented verbally if the LCC Public Health Officer were able to attend and not on annual leave.

The Leeds City Council Locality and Primary Care Public Health are concerned about the potential harm to families, children and younger adults who have complex lives, are considered vulnerable and may be suffering or recovering from alcohol addictions.

On the $17^{\text {th }}$ of August 2022 I attended the New Wortley Community Centre run 'Enabling Play Day' for families held on the grass area the Wortley's High Rise Social Housing and on the $20^{\text {th }}$ of August I attended the New Wortley Festival on Jailey Field next to HMP Leeds. We were asking residents about the cost-of-living crisis and how we could help.

Included in this conversation was a discussion about problems in the local area and the most prolific theme outside of the cost of living is listed below. Between the two events nine families highlighted the problem anecdotally.

- The constant availability of strong discounted alcohol in the ward and it's increasing supply as hours are extended and new premises spring up.
- Local parents were worried their children would see this as normal including intoxicated adults adjacent to the high rise or walking past and were concerned they would ask older children to purchase the alcohol for them. Four families said this had already happened and they had reprimanded their children.
- Lastly some of the families, carers and guardians were very open about their own past addictions and disclosed increasing trading hours changed the environment and made it harder to work through their own harm reduction programmes because of ease of availability and subsequent temptation.

Advanced health Improvement Specialist for Leeds City Council-Public Health Officer for the West-Locality and Primary Care Team-Public Health Division.

