

Leeds District Licensing Dept.

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

cc. Kaewan Salam HAMARASHED [REDACTED]

RE: 6-8 Town Street, Armley, Leeds LS123AB

**APPLICATION FOR NEW 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 the 31st January 2023.

The application relates to a premises which falls within an area of Leeds currently subject to an assessment of cumulative impact, as detailed in the present Statement of Licensing Policy 2023 - 2027, 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.

The full details of the Armley CIA can be found within the current '2023-2027 Statement of Licensing Policy' of Leeds City Council, from paragraphs 7.26 to 7.28. Armley is identified in the policy as an area suffering from antisocial behaviour perpetrated by people purchasing alcohol on Town Street and Branch Road and then remaining in the area to drink it. The policy states it would be inconsistent with the council's duty to promote the licensing objectives to grant new and variation applications for any premises licence which seeks off sales of alcohol.

There is an abundance of premises in this area that provide alcohol for sale off the premises.

The applicant has failed to show how their operation would not add to the cumulative impact of this type of premises on the area.

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This applicant has amended the hours that they wish to operate. They now wish to supply alcohol for consumption 'off' the premises only, every day 1000 x 2200hrs every day with the exception of Sunday where it will be 1000 x 2100hrs.

The application is similar to, and in some cases exceeds, the hours of operating that are already allowed with the majority of existing premises with a licence for the sale of alcohol for consumption off the premises in the area. It cannot be envisaged how another similar premises operating these hours of trading would not add to the issues with regards problem street drinkers in the Armley area.

The conditions offered by the applicant are very scant in their details and in their entirety amount to:

"Use of a register for customers who appear under the age"

"Use of CCTV and report to the police"

The amended application still has no conditions offered that seek to mitigate against the issues as outlined in the cumulative impact policy for Armley.

In addition, they do not adequately show how they would uphold the licensing objectives of:

- the prevention of crime and disorder
- public safety
- the prevention of public nuisance
- the protection of children from harm

This type of premises enables the easy access to alcohol by problem street drinkers in this area. This results in the ongoing problems of disorder and anti-social behaviour associated with people with alcohol issues that congregate within this area of the Armley.

Officers who work in the area on a day-to-day basis have previously described the following issues:

- Groups of males gathering on Town Street and neighbouring streets,
- People becoming intoxicated as early as 7am
- Street drinkers vomiting and urinating in the street and on buildings
- Street drinkers arguing with each other or members of the public
- Males passed out in the shop doorways and soiling themselves.

The applicant has not 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 7.26 of the policy identifies that the area is suffering from the cumulative impact of off licences leading to problems undermining the licensing objectives.
- Paragraph 7.27 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 7.28 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 7.39 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

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the issues. In fact, the applicant has made no reference at all to the CIA and the issues the area is experiencing.

It is impossible to comprehend how, should this application be granted, it would not exacerbate the problems associated with the Armley area and the subsequent implementation of the Armley CIA. West Yorkshire Police respectfully requests a presiding sub-committee to refer to the full 'Statement of Licensing Policy' and refuse it outright.



Leeds District Licensing Officer
West Yorkshire Police

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