

**Elections and Regulatory Services**

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**Private & Confidential**

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20<sup>th</sup> February 2023

**Off Licence, 6-8 Town Street, Armley, LS12 3AB**  
**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 located is 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 7.29 to 7.31 which states:

- 7.29 The council has assessed crime statistics for the area known as Harehills and has determined that there is an area that is suffering from the cumulative impact of off-licensed premises and consequently this is leading to problems which are undermining the licensing objectives. Specifically the area around Harehills Road and Harehills Lane is particularly suffering from the cumulative impact of too many off licences. Maps showing the exact geographical area included in this area can be found in the cumulative impact assessment.
- 7.30 In this area the nature of the problems is alcohol related violent crime and nuisance being suffered by people living in this mainly residential area. More information on the evidence can be found in the cumulative impact assessment.
- 7.31 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 and late night refreshment to operate during the peak hours described in the cumulative impact assessment for Harehills.

I refer you to the council's Cumulative Impact Assessment for Armley (pages 33 – 40 of the Cumulative Impact Assessment 2023-25) for further information. This provides both crime data, and the data provided by the Alcohol Licensing Data Matrix.

I refer you to 7.38 to 7.46 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 also refer you to 7.45 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.

## Your Application

I note that your application is for an off licence store, with sale by retail of alcohol Monday to Sat from 7am to 11pm and Sunday 10am to 11pm for consumption off the premises. In your operating schedule you have only offered CCTV, a register for customers who appear underage and a police report.

## Alcohol Licensing Data Matrix

In 2021 the Council updated the Alcohol Licensing Data Matrix. The data used in the Matrix has been updated and is now based on a larger area known as MSOA. 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 (Armley and New Wortley) as **very high**. It is ranked 2nd highest out of 107 MSOAs for potential alcohol related harm.

Indicator	Category	Rank
Alcohol specific emergency admission count	Very high	1
Alcohol treatment, all episode counts	Very high	1
Off Licence premises count	Very high	2
Antisocial behaviour - alcohol related, count	Very high	2
Ambulance callouts related to alcohol, count	Very high	2
Drunk and disorderly, count	Very high	3
Alcohol related harm hospital stays (narrow, age std. rate)	Very high	5
Violent crime where alcohol flagged, count	Very high	5
Deprivation Score	Very high	7
NEET (not in education or training)	Very high	9
AUDIT tests scoring 16 or more (higher risk)	High	10
Looked after children	High	12
Population aged 16 and under	High	14
Stroke emergency hospital admissions (age std. rate)	High	16
On Licence premises count	High	18
Licensing risk score	High	19
Not achieving English & Maths strong pass	High	23
Alcoholic liver disease mortality rate	Medium	53

This area ranks very high for data sets that relate to alcohol treatment, and hospital data that is linked to dependent drinking. It ranks very high for data sets related to alcohol related crime, including drunk and disorderly and antisocial behaviour. It ranks very high for the density of off licensed premises – only the city centre is higher. This, and anecdotal evidence from residents, tells us this area is already suffering greatly from the cumulative effect of the high number of off licensed premises.

The data also shows there are high levels of vulnerable children living in this area.

In addition, your application does not provide any measures that could mitigate this harm. This demonstrates that you either do not take these matters seriously or that you do not have knowledge of the problems being experienced in Armley.

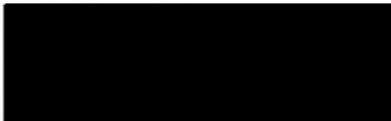
## **Conclusion**

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

A solid black rectangular box used to redact the signature of Susan Duckworth.

Susan Duckworth  
Principal Licensing Officer  
Entertainment Licensing