

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: PREM/05035/001

Off Licence- 6-8 Town Street, Armley, LS12 3AB

Section 2 – Your personal details

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

Title	Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Miss <input type="checkbox"/> Other _____
Surname	Hindley
First name(s)	Jonathan

Address (incl postcode):

Leeds City Council, Public Health (Localities and Primary Care Team), 5th 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/ Organisation	N/A
Full postal address (Incl postcode)	N/A

Please indicate capacity:

Representative of Residents Association
MP

Ward Councillor
Trade Association

Parish Council
Other (please specify)

Section 4 – Representation grounds		
<p>The representation is relevant to one or more of the following licensing objectives:</p> <p>Please tick relevant box(es)</p>	Prevention of crime and disorder	X
	Prevention of public nuisance	X
	Protection of children from harm	X
	Public safety	X
<p>Please select:</p> <p>I object to the application being granted at all</p> <p>I object to the application being granted in its current form*</p> <p>*If you choose this option, remember to tell us in the next section what changes you would prefer to see.</p>		
<p>The grounds of the representation is based on the following:</p>		
<p>Context</p> <p>Armley is a ward with over 25,000 residents and a registered patient population of over 27,000. 20% of these citizens are made up of 0–15-year-olds. 37% of the population live in the most deprived 5th decile of Leeds. 64.3% of children in Armley, encompassing 9 x LSOAs live in households where income deprivation affects children. Armley has historically suffered from low employment, poor school attainment and disruptive levels of crime including anti—social behaviour and public nuisance and disorder. It has one of the highest densities of licensed premises in the city. Although generations of residents have successfully been raising families and local business have mostly offered what local community members need in a professional manner. However, in the face of ten years of austerity followed by a pandemic and then being plunged into an extreme cost of living crisis has made it difficult for parents and carers to raise families away from the blight of alcohol dependency in an environment of easily available, ‘around the clock’ cheap and strong alcoholic products.</p> <p>New data published by The Office of National Statistics (ONS) in Dec 2022 illustrates the number of people who died due to diseases known to be a direct consequence of alcohol use. The main points from the statistics are:</p> <ul style="list-style-type: none"> • In 2021, there were 9,641 deaths (14.8 per 100,000 people) from alcohol-specific causes registered in the UK, the highest number on record. • The number recorded in 2021 was 7.4% higher than in 2020 (8,974 deaths; 14.0 per 100,000) and 27.4% higher than in 2019 (7,565 deaths; 11.8 per 100,000) <p>Armley is currently subject to a Cumulative Impact Policy due to the high concern of alcohol prevalence and related crime incidence in the area by Police and partners. These premises are located right in the middle of this assessment area on Town Street.</p> <p>“People from higher socio-economic groups drink more alcohol on average but are significantly less likely to suffer the consequences to health than those from the most deprived communities. Humankind Paul Townsley and Dr Roya Vaziri respond to the <i>rising number of alcohol related deaths – Humankind</i> (humankindcharity.org.uk)</p> <p>Research conducted in Edinburgh found that there is often a far higher concentration of shops selling alcohol in the poorest neighborhoods. Higher levels of ‘outlet density’ is linked to both higher levels of consumption and health harms. The implication of these findings, then, is that the ‘harm paradox’ is partly linked to a greater saturation of outlets – especially smaller shops selling very cheap alcohol – which, in turn facilitates higher levels of consumption.</p> <p><i>A cross-sectional analysis of the relationship between tobacco and alcohol outlet density and neighbourhood deprivation</i> (Niamh_K-Shortt et al., 2015).</p> <p>Although this research is based on a wider geographical level than Armley it can be used to draw parallels to indicate this is also likely to apply to a deprived community like Armley.</p>		

I would like to bring to your attention the negative impact granting the alcohol off-licence application would have on the local community. This would be a concern regarding the potential harm to children, crime and disorder, public nuisance, and public safety.

After more than 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 Armley. Much work has successfully been undertaken by Ward Councilors, the Police, and the Council's Safer Stronger Communities, the Council's Town Team to make Armley a more attractive and safer (retail) area. Their success in reducing street drinking and crime levels will be significantly undermined by a retail outlet selling cheap alcohol from Monday to Saturday between the hours of 07:00 - 23:00. Selling alcohol from 7.00am to 23.00hrs is excessive and would not be advisable for an area like Armley which has school children walking to school and to after school clubs directly through Town Street.

Leeds City Council has produced a data matrix to estimate alcohol harm for each Middle Super Output Area (MSOA) in Leeds. The data matrix is a credible source of information, developed by Leeds City Council Information Analysts and the Licensing team, it was shortlisted for the Local Government Association awards 2019.

Each MSOA is given an overall score which places the MSOA into a comparative city-wide risk rating. There are 107 MSOA's in Leeds. LS12 3AB was awarded an overall harm from alcohol related risk is **6 out of 438 LSOAs**, putting it within the **high** risk of alcohol-related harm category. Analysis of the individual scores on the matrix contribute to creating a fuller picture of the local community and will be highlighted forthwith with reference to the licensing objectives and evidence based on research.

- **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 their 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. Two thirteen old Children accessing Public Health projects in the area when asked about their aspirations said.
"I want to stay at home and drink beer in front of TV like my Dad"
"I want to get' %@||@##'-up on booze like my sister"
- There is a strong perception from residents that it is not safe to go out after a certain time by themselves or with their children, 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 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-drunk-lockdown/>
- We are seeing the consequences of this locally, as a hardcore 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.

- 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 must 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.
- To try 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.
- To approve this application would be irresponsible and cause harm to our most vulnerable residents.
- It would also contradict all the hard work by the Police, Town Street Team 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 within the CIP area, in the heart of a residential area, and we would urge the licensing committee to refuse this application considering representations submitted.

Alcohol use is a leading cause of harm in young people and increases the risk of alcohol dependence in adulthood.

Children are particularly vulnerable to alcohol-related harms due to their developing brains and inexperience with the risks of alcohol consumption. **Vulnerability to alcohol-related problems: a policy brief with implications for the regulation of alcohol marketing** (TF. Babor et al, 2017).

This area has the **10nd highest for LSOAs** number of off licenses density in Leeds and **is risk rated as very high**. It is likely to add to the impact already being experienced in the area and jeopardise the protection of children and young people from harm.

A recent study (2022) taken place in Scotland found,

‘Children living in the most deprived areas were almost five times more likely to be exposed to off-sales alcohol outlets than children in the least deprived areas’ **Inequalities in children’s exposure to alcohol outlets in Scotland: a GPS study** – (Fiona M. Caryl et al.,2022)

The abundant presence of alcohol outlets, and associated marketing in children’s environments may normalize alcohol as an every-day product, shift social norms in acceptability and use, and shape children’s knowledge, attitudes, and beliefs. **Children’s home and school neighbourhood exposure to alcohol marketing** (T Chambers et al.,2018).

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 their 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.

- **Prevention of crime and disorder**

After over two years of the coronavirus pandemic levels of alcohol consumption have increased in this area of multiple deprivations exasperating the problems in this designated Cumulative Impact Area. Much work has successfully undertaken by the Police and the Leeds City Council Town Centre Team to make Armley a much more attractive, prosperous, and safe retail hub. Their success in reducing street drinking and crime levels will be significantly undermined by yet another retail outlet selling alcohol.

Increasing the availability of cheap strong alcohol is strongly correlated with a higher prevalence of

alcohol-related crime and disorder. This is backed up by statistics from Safer Leeds, which records the number of incidents of ASB, drunk and disorderly and violent crime statistics.

Alcohol related admissions to Accident and Emergency are deemed very high risk in the Armley Ward.

Domestic Violence and Abuse and Adverse Childhood Experiences (ACEs) and links to alcohol

Although alcohol alone cannot cause domestic violence and abuse it can lead to aggressive incidents, anger, irritable and be a trigger point for some.

“Alcohol can affect our self-control and decision-making and can reduce our ability to resolve conflict. Global evidence shows that alcohol use can increase the severity of a violent incident” Alcohol and domestic abuse | Alcohol Change UK

National data suggests, almost one in three women aged 16-59 will experience domestic abuse in her lifetime –

Office for National Statistics (2019) Domestic abuse in England and Wales overview: (November 2019)

ACEs, such as being a victim of violence or neglect, or living with a household member who abuses substances or is involved in criminal activity, are associated with negative adult outcomes such as health harming behaviours, chronic conditions, and increased health care utilisation and costs. (Routine enquiry for history of adverse childhood experiences (ACEs) in the adult patient population in a general practice setting: **A pathfinder study (2018)**)

During lockdown, national statistics illustrated that activity across Refuge’s specialist services had increased significantly during lockdown. Between April 2020 and February 2021, the average number of calls and contacts logged* on their database per month was 61% above the January-March 2020 period
A year of lockdown: Refuge releases new figures showing dramatic increase in activity – Refuge

Approximately 22,000 domestic abuse incidents were reported to the Police in Leeds in 2019 (West Yorkshire Police).

In Leeds 4680 cases were taken to Multi Agency Risk Assessment Conference (Marac) This is where high or medium risk cases of domestic abuse are referred and discussed by practitioners to increase safety and reduce risk of serious harm to victims/children/vulnerable adults. Of these cases **3989 involved children.** (MARAC data 2021)

- **Prevention of public nuisance and public safety**

- On Friday 21st May 2021 and LCC Public Health Officers were talking to residents in the area with third sector colleagues and we received quite a few comments about how unsafe they felt on Branch Road and Armley Town street occasionally during the day and after 7.00pm at night.

[REDACTED] The comments when asked what their experience of the pandemic had been and how they felt the area was to live in. They complained of aggressive street begging and inebriated men standing on Branch Road swearing making them feel intimidated. Following on from these conversations Public Health, Third Sector and Partner subsequent outreach in the months of August to December 2021, and January and early February 2022 whilst door knocking and leafleting to promote the pop-up Covid-19 vaccination clinic offer in the local area many of the same comments were mirrored when officers did wellbeing checks. Their comments were.

2021

- *“It’s worse now as we come out of lockdown, always drunk men I don’t go down there now (referring to Armley Town Street)”*
- *“if they are drunk and get refused from one off license there are plenty of others, they can try their luck in”*
- *“it’s just cheap strong booze innit, people come from town because it’s (alcohol) cheap, gets the job done”*
- *“Why have they allowed so many shops to sell alcohol it’s dangerous to residents with*

drunken people around”

2022

- *“Got my jab thanks, (when asked about general health and wellbeing) booze everywhere, its mad, feel sorry for the Police, more of them around but you can buy it everywhere” 58 Male Armley Resident*
- *“Yeah, got it ta, don’t take the kids down, go to Bramley Shopping Centre instead, bit more family friendly. So many of ‘em drinking cans on the way to school” 26 yr. old Female Armley resident.*
- *“Thanks love got me booster, spoke to you last year I think, things are better, street drinking still around. I’m 71 retired I only shop there because I must sometimes” 71 Male Armley Resident*

We know there are vulnerable families with dependencies and alcohol addiction who are susceptible to easy and prolonged access to cheap strong alcohol, it is difficult to see how this business would mitigate against this.

Alcohol related harm hospital stays are very high in the area. These are avoidable pressures to the NHS and illustrate the harm caused by easy access to cheap alcohol within an area. Alcohol Change UK who work with communities illustrate this point clearly –

People living in deprived areas are many times more likely to experience an alcohol-related hospital or die of an alcohol-related cause. Poorer areas tend to have much higher numbers of people with complex needs, and a lack of services that can support those people

Alcohol and inequalities | Alcohol Change UK

Street drinking and the associated negative safety and environmental impacts on residents and businesses has been a long-standing issue in the Armley ward. I would urge to seriously consider the vulnerable residents in the Armley ward when taking the granting of this license into consideration.

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 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.

Lastly much work has been undertaken by the Police of a very difficult and challenging nature to make this shopping area a safe and pleasant one to visit for local people. I feel in a Cumulative Impact Policy Area, yet another retail outlet selling alcohol would undermine this. In addition, the Town Street Team have worked similarly hard to improve the image of the area, include new local business in decisions affecting the area to not only make it an appealing and safe area to visit for shoppers but significantly aid its increase in footfall and subsequent economic regeneration. I feel yet another license for alcohol sale would undermine this.

In summary, I have provided detailed research and evidence including the Cumulative Impact Policy Assessment as well as community feedback which indicates increasing the accessibility of alcohol in the area will impact on the licensing objectives. It is likely to add to the burden of ensuring public safety in the local area, increasing crime and disorder. It is our duty to protect children from harm especially as we have a high population of vulnerable children and young people living within the area who will bear the brunt of increased accessibility and exposure to low-cost alcohol. As well as protecting our NHS as evidence indicates a need for ambulance callouts and hospital admissions being high because of alcohol consumption.

The pandemic has undoubtedly impacted on the communities in this priority neighborhood in terms of economic decline adding increased cheap and strong alcohol to an already saturated environment to communities who are struggling with daily life, poverty and deprivation, domestic abuse, low mood, anxiety, and depression is irresponsible and will be detrimental to child development, family life and public order.

The application does not contain sufficient information about how granting the licence would not add to the impact already being experienced in the area. I would therefore urge the licensing subcommittee to

refuse this application to avoid the detrimental impact and harm to children, additional crime and disorder, public nuisance and maintain public safety.

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: 02nd February 2023