



Leeds
CITY COUNCIL

Elections and Regulatory Services

Civic Hall
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Private & Confidential

Eri Red Sea Ltd
97 Roundhay Road
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Contact: Susan Duckworth



By email: [REDACTED]

20th March 2023

Eri Red Sea, 97 Roundhay Road, Leeds, LS8 5AQ 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 Harehills 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 Harehills (pages 41 – 50 of the Cumulative Impact Assessment 2023-25) for further information. This provides both crime data, and the data on 16 data sets for all three MSOAs affected. Please see page 42 to 44 of the Cumulative Impact Assessment.



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.

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 (Harehills North – E02002377) as **medium**. It is ranked 30th highest out of 107 MSOAs for potential alcohol related harm.

Indicator	Category	Rank
Population aged 16 and under	Very high	2
NEET (not in education or training)	Very high	2
Looked after children	Very high	6
Stroke emergency hospital admissions (age std. rate)	Very high	8
Not achieving English & Maths strong pass	High	10
Deprivation Score	High	15
Off Licence premises count	High	21
Antisocial behaviour - alcohol related, count	High	14
Drunk and disorderly, count	High	13
Licensing risk score	High	22
Alcohol related harm hospital stays (narrow, age std. rate)	Medium	36
Violent crime where alcohol flagged, count	Medium	35
Alcohol treatment, all episode counts	Medium	53
Ambulance callouts related to alcohol, count	Medium	43

This area ranks very high for population aged 16 and under, looked after children, children not in education, employment or training, and high for children not achieving a strong pass in English and Maths. This shows that this area has an unusually high number of vulnerable children.

This area ranks very high for stroke emergency hospital admission which can be related to the misuse of alcohol. More concerning is that the other data sources that are ranked high include off licence premises count, alcohol related antisocial behaviour, drunk and disorder and licensing risk score. This shows that people are already affected by alcohol related crime and disorder. The licensing risk score is concerning because this is the score given to premises when being inspected by licensing enforcement officers and shows that not only are there a lot of shops selling alcohol, but the high licensing risk score shows that these premises are inspected more regularly than in other areas. This would be due to complaints and licence breaches.

These data points towards an area with both adults and children suffering from alcohol related harm, whether that be directly or indirectly. All this is confirmed by the anecdotal evidence provided by residents for the 2018 Cumulative Impact Assessment.

It should be noted that although this MSOA is rated as medium risk, albeit at the top end of that category, the high density of housing means that Harehills is covered by three MSOAs. Harehills South is ten minutes away on foot and ranks 18th out of 107 MSOA and is considered high risk. Burmantofts is 1 mile away and ranks 10th out of 107 MSOAs. All three rank very high for the vulnerable children datasets, and either high or very high for density of off licences. All three rank high for alcohol related antisocial behaviour.

In the Harehills and Burmantofts area, there are more than 29 premises which hold licences to sell alcohol for consumption of the premises.

The council holds a 6 weekly multiagency group where various agencies, including ward members, Entertainment Licensing, West Yorkshire Police (Neighbourhood Policing and Police Licensing), Touchstone, which provide outreach treatment services, Environmental Health and others to discuss the ongoing issues in the area. Those most reported are the issues related to street drinking, where large groups of people stand in the street to drink and socialise. These groups often display antisocial behaviour. We know from the outreach work, that people come from all over the city to Harehills to stand and drink in the street. The reason for this is the proliferation of small shops selling alcohol.

Your Application

Your application is for a premises licence for a convenience store with off licence. You intend to sell alcohol for consumption off the premises from 9am to 8,30pm Sunday to Thursday and from 9am to 10pm on Friday and Saturday.

In your application you recognise that this premises in the cumulative impact area and have offered CCTV, sealed containers, no superstrength beer, lager, cider or spirits above 5.5% ABV (except for premium beers and ciders supplied in glass bottle or cans). You have offered no single cans, a restriction of sales area to 25% alcohol, age verification, incident and refusal registers, and staff training.

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