

## 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: **Maxi Food – 22 Harehills Road, Leeds, LS8 5PB**

### Section 2 – Your personal details

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

Title

Mr ☐ Mrs ☒ Miss ☐ Other \_\_\_\_\_

Surname

**Patel**

First name(s)

**Chetna**

Address (incl postcode):

Leeds City Council, Public Health (Localities and Primary Care Team), 5<sup>th</sup> 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

☐

Ward Councillor

☐

Parish Council

☐

MP

☐

Trade Association

☐

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 <input type="checkbox"/>
	Prevention of public nuisance	X <input type="checkbox"/>
	Protection of children from harm	X <input type="checkbox"/>
	Public safety	X <input type="checkbox"/>
<p>Please select:</p> <p><input type="checkbox"/> I object to the application being granted at all</p> <p><input type="checkbox"/> 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><b>Context</b></p> <p>Harehills is a densely populated area and has experienced significant growth, census data (2011) for the ward of Gipton and Harehills shows the population at 27,078 this has increased to 30,883 census data (2021). When comparing the city average to the population of Harehills the area has a significantly younger and higher population of young people aged -0 -15 years old the Leeds figure being 17.8% compared to 26.8% in Harehills. The total population of Harehills under 64 is 92.6% compared to the Leeds 85% census data (2021). The Index of Multiple Deprivation deciles, indicates 1 as the most deprived decile and 10 the least deprived decile. Deciles are calculated by ranking the 32, 844 neighbourhoods in England from most deprived to least deprived and dividing them into 10 equal groups. The Index of Multiple Deprivation (IMD) is the official measure of deprivation in England. The ward of Gipton and Harehills is ranked 1 within the most deprived decile.</p> <p><a href="https://observatory.leeds.gov.uk/children-and-young-people/profiles/">https://observatory.leeds.gov.uk/children-and-young-people/profiles/</a></p> <p>Harehills has the poorest outcomes in Leeds in terms of Communication and Language at age 5 (27.1%) and lowest take-up of early education age 2 (26%) <i>EYFS (2019)</i>.</p> <p>Persistent absence from school is higher in the area than the city average. In 2016/17 16% of primary school children were persistently absent compared to the city average of 8% and 25% secondary school age children were persistently absent compared to 15% for the city.</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"> <li>• 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.</li> <li>• 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)</li> </ul> <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 <a href="https://humankindcharity.org.uk">Paul Townsley and Dr Roya Vaziri respond to the rising number of alcohol related deaths – Humankind (humankindcharity.org.uk)</a></p> <p>Research conducted in Edinburgh found that there is often a far higher concentration of shops selling alcohol in the poorest neighbourhoods. 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>		

***A cross-sectional analysis of the relationship between tobacco and alcohol outlet density and neighbourhood deprivation*** (Niamh\_K-Shortt et al., 2015).

Although this research is based on a wider geographical level than Harehills it can be used to draw parallels to indicate this is also likely to apply to a deprived community like Harehills.

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 with regard to the potential harm to children, crime and disorder, public nuisance and public safety.

I strongly object to this license on the following grounds.

After 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 Harehills. Much work has successfully been undertaken by Ward Councillors, the Police, and the Council's Safer Stronger Communities Team to make Harehills 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 every day between the hours of 08:00 - 23:00. Selling alcohol from 8.00am is excessive and unnecessary especially for an area like Harehills Road which has school children walking to and from school and means they are being exposed to more off licenses in the area.

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. LS8 5PB was awarded an overall harm from alcohol related risk as **30 out of 107 LSOAs**, putting it within the medium 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.

In addition to statistics, I have also included a statement from the assistant manager of the local community hub and a local GP whose surgery is located on the same road as the proposed premises, and who is also the Clinical Director of the Burmantofts, Harehills and Richmond Hill Primary Care Network.

- **Protection of children from harm**

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 **2<sup>nd</sup> highest** number of off licenses in Leeds and **is risk rated as very high**. There is already **28 off licenses** in the Cumulative Impact Area, a high density of off licenses in a small area. What would be the benefit of granting this licence when there is an off licenses in such proximity. 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.

This area has the **highest number of children** under the age of 16 in Leeds District, under 53% of the population is aged 29 or under. The increased number of establishments selling cheap and strong alcohol and the subsequent proliferation of street drinkers and residents suffering from alcohol addiction normalizes the situation for children and as they grow older it almost sets the benchmark of what is normal in their area. Peer reviewed evidence

illustrates such an environment can have a strong influence on impressionable children in low-income neighborhoods and can create low aspiration amongst this peer group.

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 normalise 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).

This area has a very high number of young people not in education or employment; it is ranked **2 out of 107 MSOA’s**. There is also a low level of educational attainment with a **high** rate of pupils not achieving a strong pass in English and Maths and is **ranked 10 out of 107**. Viewed alongside the **very high** number of looked after children and young people, which is **ranked 6 out of 107 MSOAs**, we have intelligence highlighting a high number of children and young people who are more vulnerable to harm. These children and young people will have experienced trauma within the family home severe enough to warrant their removal from that family home. Their life experience will undoubtedly be skewed from the norm which often results in the young person engaging in harmful behaviours, one of which is alcohol drinking. Furthermore, Harehills Road is a busy walking route of school children and their parents being exposed to alcohol outlets as described in the research above opening at 8am when children are walking to school. There is already **5 off licenses on Harehills Road** the nearest one being **2 minutes away - 0.1 mile** from the proposed off license and another 5 off licenses situated on **Roundhay Road 4 minutes away - 0.2 miles**. This is likely to add to the alcohol harm in the area as demonstrated in the data below bringing potential harm to children. The nearest school are Bankside Primary School which is **6 minutes away** and Co-op Academy Nightingale which is **10 minutes away** from the proposed off license and a likely route for parents and children to take. It is also **3 minutes away** from Sunshine Community Nursery where parents would be taking young babies daily.

- **Prevention of crime and disorder**

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.

Anti-social behaviour where alcohol was flagged (excluding violent crime) was ranked as **14 out of 107 MSOA’s**, and violent crime was ranked **35 out of 107 MSOAs**. Statistics relating to drunk and disorderly is also **high** and ranked as being **13 out of 107 MSOA’s**. These indicators both suggest a risk to public safety, feeling unsafe for communities who are out in their local area; as well as high levels of crime and disorder in existence in the community. This can be prevented by rejecting the application and avoiding all harms of crime and disorder and reducing the accessibility of cheap alcohol. The area is populated with a church/a local mosque/community centre/a local park where people will want to get on with their daily lives and not feel unsafe or at risk of crime.

Healthwatch and other 3<sup>rd</sup> sector organisations prepared a report focusing on Covid 19 and issues facing the communities in Gipton and Harehills. A survey was completed by 80 people of which a third of the respondents’ said crime was something they wanted to see changed in Gipton and Harehills. The issues most often referenced were street drinking and drug dealing, as well as violence and generally not feeling safe in streets and parks.

One participant stated, *“She didn’t want to live in the area when her children grow up due to the amount of gang crime, anti-social behaviour, street drinkers, domestic violence and litter”*.

Another participant commented *“She regularly has to deal with anti-social behaviour on her street and*

*in the local area. Drink and drugs are a big problem, and she doesn't feel safe letting her child play in the garden without her, due to concerns of needles and other rubbish that he may pick up and hurt himself with. There is also the issue with the new bus stop on Compton Road being used by alcohol drinkers as a shelter whilst people waiting for the bus have to wait outside as there is no space or they are too intimidated to go inside".*

**COVID Prevent: Living in Gipton and Harehills during the Pandemic and Beyond (June 2021).**

### **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)

During the pandemic in Gipton and Harehills there was increased reports of domestic violence and abuse (DVA) due to drinking more heavily and increased stress. Due to the sensitive nature of the data it is not possible to share Gipton and Harehills information however on in the Inner East area which covers Gipton and Harehills data indicates a count of 188 for one week 2<sup>nd</sup> – 8<sup>th</sup> January 2023 (Gipton and Harehills had the highest count of the 3 areas which includes Burmantofts & Richmond and Crossgates and Whinmoor).

The HATCH partnership which works with local organisations, Leeds City Council and the NHS created a subgroup to focus on DVA. HATCH aims to improve the health and wellbeing of people who live in Chapeltown, Burmantofts, Harehills and Richmond Hill. I have chaired this group for a year we have delivered training courses for local organisations, community events and social media campaigns. Given the complexities of the communities and the struggles that communities face and how alcohol can impact on DVA and children within families it would be detrimental to grant this license.

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

Alcohol related harm hospital stays are medium in the area – risk ranked **36 out of 107** MSOA's and ambulance callouts related to alcohol are also **medium** (43 out of 107 MSOAs). 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 works 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 Gipton and Harehills ward. I attend a partnership group of the Police, the third sector (Touchstone) and the Council. The 3<sup>rd</sup> sector organisation Touchstone have developed relationships with the street drinkers, to support them and when ready to refer into alcohol services in Leeds. Around 12-15 people now regularly attend and engage with support services at these sessions, with over 104 individuals engaging with the sessions overall. The availability of an outlet selling cheap high strength alcohol will undermine the achievements and pro-active work that has already taken place with street drinkers in the area.

This off license would be located **2 minutes from the Banstead Park** and evidence shows that street drinkers will congregate where cheap alcohol is available and highly likely to drink in local parks like Banstead Park which makes it feel unsafe for local communities who want to enjoy the local park with their children.

The local community hub Compton Centre provides help and support on a range of issues in a safe environment and is well used by local communities. The centre also delivers local activities and events for children and families. Diane Nicholson, the Assistant Community Hub Manager provided a statement below -

*“There has been an increase of street drinkers in Harehills. The street drinking is not promoting healthy lives in the community and is adding pressure on businesses.*

*The Compton Centre, which I manage, has beautiful grounds with picnic tables, play area for families and residents to enjoy. We are often having to remove the street drinkers from the grounds where they are drinking, and children are playing nearby. It is important that children and families feel safe inside and outside of the building. This off license would have a negative impact on the health & wellbeing in the community, increasing alcohol consumption, alcohol related health issues and impacting on children and families in the area”.*

Dr Nadia Anderson, GP Partner North Leeds Medical Practice and Clinical Director BHR PCN, has provided a powerful statement which explains why she is highly concerned about this application.

*I am a General Practitioner and Clinical Director of a network of practices in the area known as Burmantofts, Harehills and Richmond Hill PCN. From my perspective the people that live in and around have unjustly worse health outcomes which have been impacted by the poverty that they are living in. People who live in this area not only die at a much younger age but spend more of their lives suffering with poor health.*

*Alcohol is being used to soothe the genuine pain that is felt by the stress of living through the pandemic and is now worsened by sharp rises in basic commodities such as food and utilities.*

*If alcohol is readily available this will encourage people who have no disposable income to spend their limited finances on this at the expense of nutritious food and heating their homes and other essentials. The empty calories that are in alcohol worsen people's health been contributing to the formation of cancer and damaging the liver. It also has a deleterious effect on people's mental health leading to further poor choices due to lack of motivation as well as general distress.*

*Sadly, I do see people who resort to drinking on the street and they neglect their other needs. We also know alcohol contributes to domestic violence and this is something that our local care partnership has prioritized.*



*The availability of alcohol and the subsequent overuse and visibility of intoxicated people has a damaging effect on young people who will see this behaviour as acceptable and risk following in their footsteps. It is intimidating for families and other citizens and contributes to stress, anxiety, and isolation as they avoid these areas. I note the application is close to the Compton Centre which provides support for the community.*

*I urge you to consider the vulnerable people who are not able to advocate for themselves when considering this application and the knock-on effect on the environment and the health of the people who live in the vicinity.*

In summary, I have provided detailed research and evidence including the Cumulative Impact 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 call-outs 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: 20 February 2023**