

APPENDIX F

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: Eri Red Sea, 97 Roundhay Road, Leeds, LS8 5AQ.

Section 2 – Your personal details

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

Title

Mr Mrs Miss Other _____

Surname

Slezak

First name(s)

Emilia

Address (incl postcode):

Leeds City Council, Public Health (Healthy Living 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

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>	<table> <tr> <td>Prevention of crime and disorder</td> <td>X</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Prevention of public nuisance</td> <td>X</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Protection of children from harm</td> <td>X</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Public safety</td> <td>X</td> <td><input type="checkbox"/></td> </tr> </table>	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"/>
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"/>											

Please select:

I object to the application being granted at all.

I object to the application being granted in its current form*

*If you choose this option, remember to tell us in the next section what changes you would prefer to see.

I would like to make a public health objection to the proposed variation of hours to sell alcohol of Eri Red Sea, 97 Roundhay Road, Leeds, LS8 5AQ.

Regarding the above application, I would like to bring to your attention the negative impact that these proposed changes will have. There are concerns regarding the potential harm to children, crime and disorder and public safety.

I would like to strongly object to this request to extend their licensable activity and opening time 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 Burmantofts/Richmond Hill and 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.

Leeds City Council has produced a matrix to estimate alcohol harm for each Middle Super Output Area (MSOA) in Leeds. 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 5AQ was awarded an overall harm from alcohol related risk as **25 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 criteria.

Protection of children from harm -

This area has a **high count** of off licenses in Leeds and is **risk rated as high with a rank rating of 16**. By allowing this off-licence premises to increase its hours that it can sell alcohol, this will jeopardize the protection of children and young people from harm. This area has the rank rating of **very high**; it has the second **highest number of children** under the age of 16 in Leeds District (ranked **2**). The increased number of establishments selling 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 sets the benchmark of what is normal in their area. We know from peer reviewed evidence; this type of environment can have a strong influence on impressionable children in low-income neighborhoods and can create low aspiration amongst this peer group. **Vulnerability to alcohol-related problems: a policy brief with implications for the regulation of alcohol marketing** (TF. Babor et al, 2017). Due to the high numbers of children in the area there are many schools and childcare providers some of which are listed below and are within one mile walking distance of the premises, which is located on a busy route for primary aged school.

- Harehills Family Early Years Centre, Cowper Terrace, Harehills, Leeds LS9 7BA (0.7 miles away)
- Dixons Trinity Chapeltown, Leopold Street, Chapeltown, Leeds LS7 4AW (0.3 miles away)
- Bankside Primary School, Shepherds Ln, Harehills, Leeds LS8 5AW (0.3 miles away)

- Hillcrest Academy, Cowper St, Leeds LS7 4DR (0.5 miles away)
- First Class Learning Leeds Harehills, St Aidans Vicarage, St Aidans Community Hall, Elford Pl W, Harehills, Leeds LS8 5QD (0.2 miles away)
- Little Owls Nursery Harehills, Cowper Terrace, Harehills, Leeds LS9 7BA (0.9 miles away)
- Sunshine Community Nursery, 97 Harehills Rd, Harehills, Leeds LS8 5HS (0.5 miles away)
- Shepherds Lane Children's Centre, Shepherds Ln, Harehills, Leeds LS8 5AW (0.4 miles away)
- Harehills Primary School, Darfield Rd, Harehills, Leeds LS8 5DQ (1 mile away)
- Co-op Academy Nightingale, 9 Stanley Rd, Harehills, Leeds LS9 7AX (0.6 miles away)
- Co-op Academy Woodlands, Foundry Pl, Harehills, Leeds LS9 6DA (1 mile away)
- Rosewood Nursery, 21 Roseville Rd, Harehills, Leeds LS8 5DT (0.2 miles away)
- Co-op Academy Leeds, Stoney Rock Ln, Leeds LS9 7HD (1 mile away)
- Shakespeare Primary School and Nursery, Lincoln Rd, Leeds LS9 7NP (0.7 miles away)
- Hovingham Primary School, Hovingham Ave, Harehills, Leeds LS8 3QY (0.8 miles away)
- Holy Rosary and St Anne's Catholic Primary School, Leopold St, Leeds LS7 4AW (0.5 miles away)

The GIPSIL - Archway Resource Centre 95 Roundhay Rd, Harehills, Leeds LS8 5AQ is next door to the premises (**89 ft away**). GIPSIL, work with vulnerable young people and have provided a statement on the impact of off license on young people they work with.

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 neighborhood exposure to alcohol marketing** (T Chambers et al.,2018).

This area has a **very high** number of young people not in education or training; it is ranked – **4 out of 107 MSOA's**. There is also a low level of educational attainment with **high** rate of pupils not achieving a strong pass in English and Maths and is **ranked 20 out of 107 MSOA's**. Viewed alongside this the area has a high number of looked after children and young people, which is **ranked high - 13 out of 107 MSOAs**, which is highly concerning as they 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. '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).

Prevention of public nuisance -

Alcohol related harm hospital stays (narrow, age std. rate) are **medium** in the area – risk ranked as **53 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 with un an area. However, in litter complaints it **ranked very high with it ranked 3 out of the 107 MSOA's**. **Extensive work has and is being conducted in the area by the council around tackling litter**. Extending the hours only increases the risk of more litter to the area.

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 record the number of incidents of ASB, drunk and disorderly and violent crime stats.

Anti-social behaviour where alcohol was flagged (excluding violent crime) was **high** risk ranked as **12 out of 107 MSOA's**, and violent crime **was medium** and ranked **34 out of 107 MSOAs**. Statistics relating to drunk and disorderly is **very high** and ranked as being **7 out of 107 MSOA's**. These indicators both suggest a risk to public safety as well as high levels of crime and disorder in existence in the community. This will be exacerbated by the increased accessibility of alcohol.

Healthwatch and other third 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 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."***

Currently in public health we are conducting Health Needs Assessment for Gipton and Harehills and Burmantofts and Richmond Hill, many local people have talked about their worries around alcohol, noise nuisance/environmental concerns, litter, anti-social behaviour, crime, and fear of crime.

I am part of the Harehills CommUNITY partnership meetings led by West Yorkshire Police and Leeds City Council, many local organisations are committed to the Clear Hold Build initiative to make Harehills a better place for communities to live, work and grow. Extending hours of off license premises like Eri Red Sea undermine all the hard work and commitment that is taking place to improve the area.

GIPSIL provides support services for vulnerable children and young people in the area. The advice and employment services manager, Patricia Vespucio provided the statement below.

GIPSIL, including our remit as lead partner in the Our Way Leeds young persons' housing support contract, have grave concerns in respect of an application for an extended hours off license on 97 Roundhay Road.

There are a number of young, vulnerable people living independently in this area, including those living in our established emergency accommodation provision. These are generally young people living on means tested, subsistence level benefits without extended family or community support networks. As such, they have additional vulnerability to exploitation from others as well as frequently living chaotic lives. Our concerns relate to the potential for financial exploitation of young people in the area given the increased availability of alcohol in the premises next door, the potential for increased risk-taking behaviours for young people using alcohol and for their exposure to other people attracted to the area because of the accessibility of alcohol due to the store extended opening hours.

Below is a statement provided by the lead GP partner at Chapeltown Family surgery which is situated less than a mile away from the premises.

I have been working at the Chapeltown family surgery for 17 years. I lead the children and family's hub which integrates schools and the community with Primary and Secondary care. We work together to help manage complex cases that local GP's struggle with.

I've found this complexity is related to the way families present and the psychological and social overlay of children's presenting complaints. The impact of alcohol and drugs are all too often a contributing factor to these presentations. Alcohol being so readily available it could be argued it is a greater threat than drugs to both adolescents and their parents.

Alcohol consumption can have a serious impact on the physical and mental development of children and teenagers, and it is the responsibility of society to take measures to ensure that children are not exposed to it in a way that could be harmful to their health and well-being.

Reducing the ready availability of alcohol can be an effective way to safeguard the health and safety of children in the local community. By controlling this availability authorities can send a clear message that the well-being of young people is a top priority. Ultimately, by taking a strong stance on this issue, we can help to reduce the prevalence of underage drinking and protect children from the many risks associated with alcohol consumption.

Dr Hasantha Jayasinghe (Senior Partner)

The intelligence provided above relates to the potential harm caused by alcohol within an area and viewed together creates an understanding of why this area was ranked as being an area of Leeds at risk of alcohol related harm. Furthermore, this application also falls within a cumulative impact assessment (CIA) area. This means as a Local Authority (LA) licensing authority we have a responsibility to help limit the number or type of licence applications granted in areas where there is evidence to indicate that the number or density of licensed premises in the area is having a cumulative negative impact.

The data above shows that there are significantly higher numbers of children, vulnerable young people, and those not in education or training who may seek comfort in alcohol/ tobacco/vaping. Providing an extension to their licencing hours can encourage those who are dependent on alcohol to increase their usage and can be particularly difficult for street drinkers who are trying to curb their reliance.

The area already suffers with high rates of antisocial crime, drunk and disorderly and litter complaints. This has a negative impact on the community, in particular the young and vulnerable population.

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

In recent weeks we have seen civil unrest in the area. Which has impacted on those living in the area, as well as local businesses, communities are concerned for their children's safety. This is in addition to the concerns mentioned above.

Communities in the area along with external partners are working extensively to see positive changes and aspire for Harehills and the surrounding areas to thrive.

I would therefore ask the licensing subcommittee to question what purpose will it serve to the community to allow this premises to increase its licensing and opening hours?

Considering, the evidence of how local people, organisations feel I would urge the subcommittee to not grant the extension of licensing and opening hours of this off license to avoid the potential harm to children, additional crime and disorder offences and maintain public safety.

Signed: 

Date: 15/08/2024