

REPORT TO:	LICENSING SUB-COMMITTEE 16 OCTOBER 2014
AGENDA ITEM:	6
SUBJECT:	GAMBLING ACT 2005 – APPLICATION FOR PREMISES LICENCE – BETTING (OTHER)
LEAD OFFICER:	Executive Director, Development & Environment Department
CABINET MEMBER:	Councillor Mark Watson, Cabinet Member for Communities, Safety & Justice
WARDS:	Norbury
CORPORATE PRIORITY/POLICY CONTEXT:	
This report is specific to this application and has no implications on the Council's Corporate Policies.	
FINANCIAL SUMMARY:	
This application is being processed as part of normal duties carried out by the Department with no additional costs involved.	
FORWARD PLAN KEY DECISION REFERENCE NO.: N/A	

For general release

1. RECOMMENDATIONS
1.1 The Sub-Committee is asked to determine whether to grant the application for a Premises Licence, (Betting (Other)) at Paddy Power, 1421-23 London Road, Norbury, SW16 4AH.

2. EXECUTIVE SUMMARY

- 2.1 The purpose of this report is to advise the Sub-Committee that an application has been received for a Premises Licence, (Betting (Other)) under the Gambling Act 2005 ("the Act"). The application has drawn representations from interested parties, therefore a hearing is required.

3. DETAIL

- 3.1 The applicant and those making representations have been notified of the hearing in accordance with the Gambling Act 2005 (Proceedings of Licensing Committees and Sub Committees) (Premises Licences and Provisional Statements) (England and Wales) Regulations 2007 ("the Regulations"). Information to accompany the notice of hearing was provided to the applicant and the interested parties in accordance with the Regulations.
- 3.2 Appendix A to this report provides details of the application.

4. FINANCIAL CONSIDERATIONS

1 Revenue and Capital consequences of report recommendations

There are no direct financial implications associated with this report, subject to the risks at 4.2 & 4.3. This application is being processed as part of normal duties and therefore the work associated with it is contained within the departmental budget.

2 The effect of the decision

The decision of the Sub-Committee may be subject to appeal and/or Judicial Review.

3 Risks

An appeal against a decision of the Sub-Committee or a Judicial Review of the application process may present financial risks to the Council with regard to any award of costs against it.

4 Options

The options available are as detailed in the recommendations at paragraph 1 above.

5 Future savings/efficiencies

None identified.

(Approved by: Dianne Ellender, Head of Finance and Deputy S151 Officer - Chief Executive's Department).

6. COMMENTS OF THE SOLICITOR TO THE COUNCIL

- 6.1 Section 153 of the Gambling Act provides that the sub-committee must aim to permit the use of premises for gambling (and therefore grant applications) in so far as they think they are in accordance with any relevant code of practice under section 24 of the Act, in accordance with any relevant guidance issued by the Gambling Commission under section 25 of the Act, are reasonably consistent with the licensing objectives and are in accordance with the Council's Statement of Principles.

6.2 The Sub-Committee must consider any relevant representations received from interested parties or responsible authorities and determine whether to grant the application, in so far as it is reasonably consistent with the licensing objectives and is in accordance with the Council's Statement of Principles, any relevant code of practice under section 24 of the Act and in accordance with any relevant guidance issued by the Gambling Commission under section 25 of the Act.

6.3 Where the Sub-Committee is minded to grant the application it is necessary to comply with the provisions set out in The Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007 which specify the mandatory and default conditions which will be applicable to the application, depending on the type of licence applied for.

(Approved by: Gabriel MacGregor, Head of Corporate Law on behalf of the Solicitor to the Council).

7. HUMAN RESOURCES IMPACT

7.1 The Human Resources impact of supporting the Licensing Hearings will be contained within the budgeted establishments of the Democratic and Legal Services and Licensing Teams.

7.2 (Approved by: Heather Daley, Director of Human Resources)

8. EQUALITIES IMPACT

8.1 The arrangements for the Licensing Hearings seek to ensure that all applicants and other interested parties receive a fair hearing and that the process is accessible to all groups within the community.

9. ENVIRONMENTAL AND DESIGN IMPACT

9.1 The effective implementation of the Gambling Act 2005 will contribute to an improved environment for local residents and other stakeholders.

10. LICENSING OBJECTIVES IMPACT

10.1 The licensing objectives contained in the Act are:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Ensuring that gambling is conducted in a fair and open way, and
- Protecting children and other vulnerable persons from being harmed or exploited by gambling

11. HUMAN RIGHTS IMPACT

11.1 The Human Rights 1998 (HRA) requires public bodies to ensure everything they do is compatible with Convention Rights and makes it unlawful for a public authority to act incompatibly with those Rights. **Article 6 (A6)** of the European Convention on Human Rights (ECHR) is the right to a fair trial. The key elements of this include:

- The right to a *fair* hearing;
- The right to a *public* hearing;
- The right to a hearing before an *independent and impartial tribunal*;
- The right to a hearing *within a reasonable time*.

11.2 When hearing an application, the proceedings of a non-judicial body such as the Licensing Sub Committee, as opposed to an actual Court, need not meet the full requirements of A6 where there is a right of appeal from the Licensing Sub Committee to a Court that does meet the full A6 standards and can consider all aspects of the case (even if that does not include a full re-hearing of the facts).

11.3 So, while it is good practice to make a hearing before the Licensing Sub Committee as A6 compliant as possible, it will not be a breach of the HRA if it is not. Further, the hearing of all applications is subject to the principles of Natural Justice and the requirement for decisions to be 'Wednesbury reasonable'.

12. FREEDOM OF INFORMATION/DATA PROTECTION CONSIDERATIONS

12.1 Procedures agreed in relation to Licensing Hearings will be accessible as part of the Council's Publication Scheme maintained under the Freedom of Information Act.

CONTACT OFFICER: Michael Goddard, Licensing Manager, Development & Environment Department, ext. 61838

BACKGROUND DOCUMENTS: Application Forms
Licensing Hearings Protocol and Procedure

1. The Application

- 1.1 This report concerns an application made under section 159 of the Gambling Act 2005 (the Act) by Power Leisure Bookmakers Limited for a Premises Licence (Betting (Other)) at 1421-23 London Road, Norbury, SW16 4AH.
- 1.2 An application for a premises licence may only be made by a person who:
- Holds an operating licence which authorises him to carry on the activity in respect of which the premises licence is sought and
 - Who has a right to occupy the premises to which the application relates.
- 1.3 A Betting (Other) premises licence is required to operate a Betting Shop (or Bookmakers) and authorises the premises to be used for:
- Betting (including betting on the outcome of virtual events)
 - Making available up to 4 gaming machines each of which is of Category B, C or D. Category B machines at betting premises are restricted to sub category B2, B3 and B4 machines.
- 1.4 Attached at Appendix A1 is a copy of the application for the premises licence and some accompanying documentation from the applicant on how they approach the licensing objectives in the Act.
- 1.5 Attached at Appendix A2 are the Mandatory and Default conditions that would automatically be attached to a Premises Licence – Betting (Other), if granted.
- 1.6 For the sub committee's information/confirmation, Power Leisure Bookmakers Ltd. currently hold a premises licence (betting (other)) at 1421 London Road. This application is for a licence for 1421-23 London Road. This is not suitable for a variation to the existing licence and requires a new licence application.

2. Relevant representations

- 2.1 Interested parties have made representations on this application and copies are attached at Appendix A3.
- 2.2 An interested party is defined in the Gambling Act 2005 as someone who –
- lives sufficiently close to the premises to be likely to be affected by the authorised activities
 - has business interests that might be affected by the authorised activities
 - represents persons in either of these two groups.
- 2.3 The applicant has been provided with a copy of the representations made and both the applicant and those making representations have been made aware of the date, time and location of the Sub Committee hearing.

3. Policy Considerations

- 3.1 Under the terms of the Act, the Council has published a Statement of Principles. This is available on the Council website at www.croydon.gov.uk . Hard copies are also available from the Council's Planning & Environment Department and copies of the policy will also be available at the licensing sub committee hearing. The following paragraphs from the Statement are considered particularly relevant with regard to this application:

PART A

1. The Licensing Objectives

In exercising most of their functions under the Gambling Act 2005 ('the Act'), licensing authorities must have regard to the licensing objectives as set out in section 1 of the Act. The licensing objectives are:

- *Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime*
- *Ensuring that gambling is conducted in a fair and open way*
- *Protecting children and other vulnerable persons from being harmed or exploited by gambling.*

The Council is aware that, as per Section 153 of the Act, in making decisions about premises licences and temporary use notices it should aim to permit the use of premises for gambling in so far as it thinks it is:

- *in accordance with any relevant code of practice issued by the Gambling Commission; and*
- *in accordance with any relevant guidance issued by the Gambling Commission; and*
- *reasonably consistent with the licensing objectives; and*
- *in accordance with the authority's statement of principles.*

PART B PREMISES LICENCES

1. General Principles

Premises licences are subject to the requirements set-out in the Act and regulations, as well as specific mandatory and default conditions which are detailed in regulations issued by the Secretary of State. Licensing authorities are able to exclude default conditions and also attach others, where it is believed to be appropriate.

This Council is aware that in making decisions about premises licences it should aim to permit the use of premises for gambling in so far as it thinks it is:

- *in accordance with any relevant code of practice issued by the Gambling Commission; and*
- *in accordance with any relevant guidance issued by the Gambling Commission ; and*

- reasonably consistent with the licensing objectives; and
- in accordance with the authority's statement of licensing policy.

It is appreciated that as per the Gambling Commission's Guidance for local authorities "moral objections to gambling are not a valid reason to reject applications for premises licences" and also that "unmet demand is not a criterion for a licensing authority in considering an application for a premises licence".

Primary Gambling Activity

The Council endorses the view of the Gambling Commission that the primary activity of the premises should be that described, for example in a bingo premises the primary activity is bingo, with gaming machines as an ancillary offer on the premises.

Location - *The Council is aware that demand issues cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives can be. As per the Guidance for local authorities, this authority will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder. Therefore, this Council will consider very carefully applications for premises licences in respect of certain gambling premises located very close to, for example, a school or centre for vulnerable adults. It should be noted that this does not preclude any application being made and each application will be decided on its merits, with the onus upon the applicant showing how potential concerns can be overcome.*

Licensing objectives - *Premises licences granted must be reasonably consistent with the licensing objectives. With regard to these objectives, the Council has considered the Guidance to local authorities:*

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime - *The Council is aware that the Gambling Commission will be taking a leading role in preventing gambling from being a source of crime. The Guidance does however envisage that licensing authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. Therefore, where an area has known high levels of organised crime this authority will consider carefully whether gambling premises are suitable to be located there and whether conditions may be suitable. The Council is aware of the distinction between disorder and nuisance and will consider factors such as whether police assistance was required and how threatening the behaviour was to those who could see it, so as to make that distinction.*

Ensuring that gambling is conducted in a fair and open way - *The Council has noted that licensing authorities would generally not be expected to become concerned with ensuring that gambling is conducted in a fair and open way as this will be addressed via operating and personal licences. However its role with regard to tracks is explained in more detail at paragraph 7.*

Protecting children and other vulnerable persons from being harmed or exploited by gambling - *The Council notes that this objective means*

preventing children from taking part in gambling (as well as restriction of advertising so that gambling products are not aimed at or are, particularly attractive to children). The Council will therefore consider, as suggested in the Guidance, whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include:

- proof of age schemes
- supervision of entrances
- supervision of machine areas
- physical separation of areas
- appropriate notices/signage
- location of entry

Conditions - Any conditions attached to licences will be proportionate and will be:

- relevant to the need to make the proposed building suitable as a gambling facility;
- directly related to the premises and the type of licence applied for;
- fairly and reasonably related to the scale and type of premises; and
- reasonable in all other respects.

Decisions upon individual conditions will be made on a case by case basis, although there will be a number of measures this licensing authority will consider utilising should there be a perceived need. There are specific comments made in this regard under some of the licence types below.

In addition, the Gambling Commission has produced Guidance to Licensing Authorities on the Gambling Act 2005 and the following paragraphs from that guidance are felt appropriate to this application:

Part 19: Betting premises

19.3 Under the Gambling Act, licensing authorities are responsible for issuing and monitoring premises licences for all betting premises.

Protection of children and young persons

19.4 Children and young persons are not able to enter premises with a betting premises licence, although exemptions apply to tracks, as explained in part 20 of this Guidance. Children and young persons are not allowed to be employed at premises with a betting premises licence.

Betting premises licence conditions

19.5 Part 9 of this Guidance discusses the conditions that may or may not be attached to premises licences, and those that are attached automatically. The Secretary of State and Scottish Ministers have set out in regulations the conditions relating specifically to betting premises. The paragraphs below discuss these conditions, both mandatory – those that must be attached to betting premises; and default – those that will apply unless the licensing authority chooses to exclude them using its powers under section 169.

Mandatory conditions attaching to betting premises licences

19.6 A notice shall be displayed at all entrances to the betting premises stating that no person under the age of 18 will be admitted. The notice should be clearly visible to people entering the premises.

19.7 There must be no access to betting premises from other premises that undertake a commercial activity (except from other premises with a betting premises licence including tracks). Except where it is from other licensed betting premises, the entrance to a betting shop should be from a street (defined as including any bridge, road, lane, footway, subway, square, court, alley or passage – including passages through enclosed premises such as shopping centres – whether a thoroughfare or not).

19.8 Any automated telling machine (ATM) made available for use on the premises shall be located in a place that requires any customer who wishes to use it to leave any gaming machine or betting machine in order to do so.

19.9 No apparatus for making information or any other material available in the form of sounds or visual images may be used on the licensed premises, except where used to communicate:

- information about or coverage of sporting events, including information relating to betting on such events (and incidental information including advertisements); or
- information relating to betting (including results) on any event in connection with which bets may have been effected on the premises. Betting operator-owned TV channels are permitted.

19.10 No music, dancing or other entertainment is permitted on betting premises. This includes any form of entertainment such as apparatus producing sound or visual images which do not fall within paragraph 19.9 or machines which do not come within the categories of machine explicitly allowed in betting premises under section 172(8) of the Act.

19.11 The consumption of alcohol on the premises is prohibited.

19.12 The only publications that may be sold or made available on the premises are racing periodicals or specialist betting publications.

19.13 A notice setting out the terms on which a bet may be placed must be displayed in a prominent position on the premises.

Default conditions attaching to betting premises licences

19.14 Gambling facilities may not be offered in betting premises between the hours of 10pm on one day and 7am on the next day, on any day.

Gaming machines

19.15 Section 172(8) provides that the holder of a betting premises licence may make available for use up to four gaming machines of category B, C or D. Regulations state that category B machines at betting premises are restricted to sub-category B2, B3 and B4 machines.

Betting machines (bet receipt terminals)

19.16 Section 235(2)(c) provides that a machine is not a gaming machine if it is designed or adapted for use to bet on future real events. Some betting premises may make available machines that accept bets on live events, such as horse racing, as a substitute for placing a bet over the counter. These 'betting machines' are not gaming machines and therefore neither count towards the maximum permitted number of gaming machines, nor have to comply with any stake or prize limits. Such betting machines merely automate the process that can be conducted in person and therefore do not require regulation as a gaming machine.

19.17 However, where a machine is made available to take bets on virtual races (that is, images generated by computer to resemble races or other events) that machine is a gaming machine and does count towards the maximum permitted number of gaming machines, and must meet the relevant category limitations for the premises.

19.18 Section 181 contains an express power for licensing authorities to restrict the number of betting machines, their nature and the circumstances in which they are made available by attaching a licence condition to a betting premises licence or to a casino premises licence (where betting is permitted in the casino). When considering whether to impose a condition to restrict the number of betting machines in particular premises, the licensing authority, amongst other things, should take into account the size of the premises, the number of counter positions available for person-to-person transactions, and the ability of employees to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people.

Primary Gambling Activity

19.19 It is not permissible for an operator to offer gaming machines on a premises which is licensed for betting but not to offer sufficient facilities for betting. A betting operating licence authorises its holder to 'provide facilities for betting' (section 65(2)(c) of the Act). Likewise, a betting premises licence authorises premises to be used for 'the provision of facilities for betting...' (section 150(1)(e) of the Act). The ability to make up to four gaming machines, within categories B2 – D, available is an additional authorisation conferred upon the holder of a betting premises licence (section 172(8) of the Act); it is not a free standing right to make gaming machines available for use. It follows that unless a betting premises operator offers sufficient facilities for betting it should not be making gaming machines available on the premises in question.

19.20 In the Commission's view it is also important, in relation to the licensing objective of protecting vulnerable persons from being harmed or exploited by gambling, that customers should be offered a balanced mix of betting and gaming machines in licensed betting premises. Thus, whilst the Commission recognises that betting premises are permitted to offer gaming machines, including B2 gaming machines, the Commission considers that betting should be the primary element of the gambling facilities being offered to customers in such premises. Betting may be provided by way of betting terminals or over a counter (face to face).

19.21 Accordingly, an operating licence condition provides that gaming machines may be made available for use in licensed betting premises only at times when there are also sufficient facilities for betting available. In this respect, such facilities must include information that enables customers to access details of events on which bets can be made, make such bets, learn of the outcome and collect any winnings.

19.22 The Licence Conditions and Codes of Practice (LCCP) sets out the full requirements on operators in licence condition 16 and code of practice provision 8.

19.23 Should a licensing authority receive an application to vary a premises licence for betting in order to extend the opening hours, the authority should satisfy itself that the reason for the application is in line with the requirements on primary gambling activity. Therefore, the applicant should be able to demonstrate that the extension of the opening hours is not designed solely to benefit from the machine entitlement and activity which is an ancillary to the primary activity of the premises, namely betting.

3.2 An ordnance survey extract map is attached at Appendix A4 showing the location of the premises.

**Application for a premises licence
under the Gambling Act 2005 (standard form)**

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is—

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

Part 1 – Type of premises licence applied for

Regional Casino Large Casino Small Casino
 Bingo Adult Gaming Centre Family Entertainment Centre
 Betting (Track) Betting (Other)

Do you hold a provisional statement in respect of the premises? Yes No

If the answer is "yes", please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

Part 2 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A

Individual applicant

1. Title: Mr Mrs Miss Ms Dr Other (please specify)

2. Surname: _____ Other name(s): _____

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]

3. Applicant's address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant's operating licence (as set out in the operating licence):

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person.

[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Section B**Application on behalf of an organisation**

6. Name of applicant business or organisation: **Power Leisure Bookmakers Ltd**

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence.]

7. The applicant's registered or principal address:

**Oneustonsq
40 Melton Street
London**

Postcode: **NW1 2FD**

8(a) The number of the applicant's operating licence (as given in the operating licence):

000-001034-N-103643-008

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: **N/A**

9. Tick the box if the application is being made by more than one organisation.

[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known): **Paddy Power**

11. Address of the premises (or, if none, give a description of the premises and their location):

**1421-1423
London Road
Norbury
Postcode: SW16 4AH**

12. Telephone number at premises (if known): **N/A**

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

Ground floor of three story building, high street location.

14(a) Are the premises situated in more than one licensing authority area? **No**

14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, **other than the licensing authority to which this application is made: N/A**

Part 4 – Times of operation

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? **No**

[Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be no.]

15(b). If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon			
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates: **N/A**

Part 5 – Miscellaneous

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued): **ASAP** (dd/mm/yyyy)

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? **No**

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application.

19(a). Do you hold any other premises licences that have been issued by this licensing authority?

Yes

19(b). If the answer to question 19(a) is yes, please provide full details:

37 Church Street	Croydon, Surrey	CR0 1RH	07/00960/GAMBOT
47/49 Westow Street	Crystal Palace	SE 19 5HT	07/00962/GAMBOT
37-39 George Street	Croydon	CR0 1LB	10/00569/GAMBOT
1421 London Road	Norbury, London	SW16 4AH	07/00964/GAMBOT
142 North End Road	Croydon, Surrey	CR0 1UE	11/00345/GAMBOT
229-231 London Road	Croydon	CRO 2RL	
756 London Road	Croydon, Surrey	CR7 6JA	13/00693/GAMBOT

20. Please set out any other matters which you consider to be relevant to your application:

1421 London Road currently benefits from a Betting (other) premises licence, which shall be surrendered upon grant of this application. The existing licence is to be retained in order to preserve the parties' interests during the application process.

Part 6 – Declarations and Checklist (Please tick)

We confirm that, to the best of my/ our knowledge, the information contained in this application is true. We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

We confirm that the applicant(s) have the right to occupy the premises.

Checklist:

- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- We understand that if the above requirements are not complied with the application may be rejected
- We understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

Part 7 – Signatures

21. Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Poppleston Allen

Print Name: Poppleston Allen

Date: 30 June 2014

Capacity: Solicitors for & on behalf of the applicant

22. For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: _____

Date: _____

Capacity: _____

[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 21 and 22.]

[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]

Part 8 – Contact Details

23(a) Please give the name of a person who can be contacted about the application:

Richard Bradley

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted:

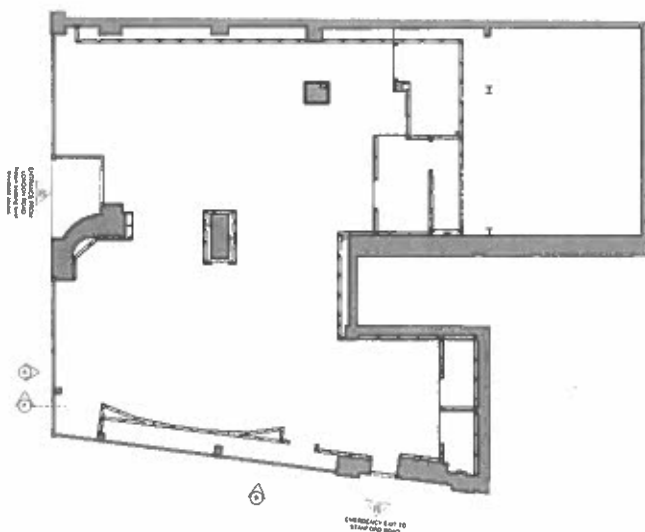
0115 948 7424

24. Postal address for correspondence associated with this application:

Richard Bradley
Poppleston Allen
37 Stoney Street
The Lace Market
Nottingham
Postcode: NG1 1LS

25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

r.bradley@popall.co.uk



LICENCE PLAN
SCALE 1:50

The area within the 'red' line is the location and extent of the premises which will be used to provide facilities for gambling

1:1250



SITE LOCATION PLAN
SCALE 1:1250

THE LIVEMORE PARTNERSHIP LLP

The Livemore Partnership LLP is a limited liability partnership registered in England and Wales under the provisions of the Limited Liability Partnerships Act 2001. The LLP is authorised to carry on business as a limited liability partnership.

As provided in the Memorandum and Articles of Association of the LLP, the LLP is authorised to carry on business as a limited liability partnership.

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Rev	Amendment	Dim
<p>THE LIVEMORE PARTNERSHIP LLP</p>		
<p>PADDY POWER PLC</p>		
<p>NEW BOOKMAKERS 121-123 LONDON ROAD NORSURRY, SW16 6AH</p>		
<p>LICENCE PLAN</p>		
Drawn by	LHT	Dim 13-C3-14
Checked by	GD	
Scale @ A1	1:50/1250	Orig no. 13508-07
<p>Bookmaker, House, 10 To 10 Bookmaker Licenceholder, License 299 146 101 11111 11111 101 11111 11111 101 11111 11111</p>		

Gambling Act 2005

THE OBJECTIVES UNDER THE ACT ARE :

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Ensuring that gambling is conducted in a fair and open way
- Protecting children and other vulnerable persons from being harmed or exploited by gambling

Gambling Act 2005

Objective 1

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

- We have adopted and complied with the guidelines produced by the Association of British Bookmakers (ABB) in relation to the Proceeds of Crime Act 2002 (POCA) .
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our UK Head of Security and record the instance in the shop log.
- We exercise considerable caution when approached by a customer unknown to us who wants to place a significant bet.
- We at Paddy Power are also aware of the need to notify the Gambling Commission should we suspect anyone, including our own staff, of committing an offence under the Act.
- All of our shops have digital CCTV installed. We have upgraded all of our existing shops to a remote system (completed end 2009) with virtually every area of the customer area supervised.
- We have a full time Head of Security / Money Laundering Officer heading a security team monitoring staff / customer activity.

Gambling Act 2005

Objective 2

Ensuring that gambling is conducted in a fair and open way.

- A copy of our current betting rules is prominently displayed in each of our offices.
- We encourage shop teams / district managers to use positive discretion to resolve customer issues at a local level – we are very proud of the fact that very few issues are escalated beyond this stage.
- Where a customer dispute cannot be resolved satisfactorily we encourage reference to IBAS.
- We will always abide by any decision made by IBAS.
- Our shop staff receive ongoing / refresher training which we believe to be essential in ensuring that any possible issues are addressed at bet acceptance stage.

Gambling Act 2005

Objective 3

Protecting children and other vulnerable persons from being harmed or exploited by gambling

- All our staff receive ongoing extensive training on social responsibility.
- The protection of the vulnerable is at the heart of all new employees' induction training regardless of whether they are experienced or not
- Under 18 notices are prominently displayed in each of our offices.
- All staff will require sight of a photographic form of identity if they suspect a customer to be under age – all such instances are recorded in the shop log.
- We prominently display leaflets and posters giving information on Gamcare services together with contact details.
- We operate a self exclusion policy whereby customers complete an exclusion form together with a recent photograph – details are circulated to all nearby Paddy Power offices.
- We regularly donate to The Responsibility in Gambling Trust (RIGT).
- Our shops are designed, wherever possible, to allow direct supervision by staff of the FOBT terminals. FOBTs are monitored by CCTV.

Mandatory Conditions Attaching to Betting Premises Licences (Other Than Track Premises Licences)

Mandatory conditions attaching to every premises licence

- the summary of the terms and conditions of the premises licence issued by the licensing authority must be displayed in a prominent place on the premises
- the layout of the premises must be maintained in accordance with the plan that forms part of the premises licence
- neither National Lottery products nor tickets in a private or customer lottery may be sold on the premises.

Mandatory Conditions Attaching To Betting Premises Licences (Other Than Track Premises Licences)

- A notice shall be displayed at all entrances to the betting premises stating that no person under the age of 18 will be admitted. The notice should be clearly visible to people entering the premises.
- There must be no access to betting premises from other premises that undertake a commercial activity (except from other premises with a betting premises licence including tracks). Except where it is from other licensed betting premises, the entrance to a betting shop should be from a street (defined as including any bridge, road, lane, footway, subway, square, court, alley or passage – including passages through enclosed premises such as shopping centres – whether a thoroughfare or not).
- Any automated telling machine (ATM) made available for use on the premises shall be located in a place that requires any customer who wishes to use it to leave any gaming machine or betting machine in order to do so.
- No apparatus for making information or any other material available in the form of sounds or visual images may be used on the licensed premises, except where used to communicate:
 1. information about or coverage of sporting events, including information relating to betting on such events (and incidental information including advertisements); or
 2. information relating to betting (including results) on any event in connection with which bets may have been effected on the premises.

Betting operator-owned TV channels are permitted.

- No music, dancing or other entertainment is permitted on betting premises. This includes any form of entertainment such as apparatus producing sound or visual images which do not fall within paragraph 19.9 or machines which do not come within the categories of machine explicitly allowed in betting premises under s.172(8) of the Act.

- The consumption of alcohol on the premises is prohibited.
- The only publications that may be sold or made available on the premises are racing periodicals or specialist betting publications.
- A notice setting out the terms on which a bet may be placed must be displayed in a prominent position on the premises.

Default conditions attaching to betting premises licences

- Gambling facilities may not be offered in betting premises between the hours of 10pm on one day and 7am on the next day, on any day.

Goddard, Michael

From: Mansell, Maggie
Sent: 25 July 2014 18:15
To: LICENSING; Goddard, Michael
Cc: Khan, Shafi; Chowdhury, Sherwan
Subject: 1423 London road

I wish to object to the extension of Paddypower betting services into the next door premises at 1423 London Road Norbury. The grounds are to protect vulnerable children or adults. My reasons are as follows:

1. There are sufficient gambling establishments within a mile radius.
2. We have had 6 year's recession and benefit cuts and taxation changes have effected many people and families within the Norbury area and especially in Polling district NY5 and NY7, the Northborough road estate.
3. Gambling , even when responsibly run, offers the change of a serious win, or even winning enough to pay a debt. Vulnerable adults will sometimes take that chance and lose money they cannot afford to lose. That is an unfair temptaion.
4. The double frontage ans side frontage would provide an attractive temptation.
5. Any additional gambling machines are a temptation which can lead to addiction and should not be available to young people.
6. The Gambling companies know the odds and they are always in the favour of the company. the customer may or may not know the odds. It is an asymetric risk.

Maggie Mansell
Norbury cllr



London Borough of Croydon
Regulatory Services
Licensing Team
10th Floor
Zone B
Development & Environment Department
Bernard Weatherill House
8 Mint Walk
Croydon, CR0 1EA

27 July 2014

Dear Sir or Madam,

GAMBLING ACT 2005
Paddy Power Application for Premises Licence
1421-1423 London Rd, Norbury, SW16 4AH

Introduction

Paddy Power already has a betting licence covering 1421. Observation suggests that this premises does not attract enough customers to justify an expansion into the shop unit next door.

Although it is not a relevant consideration there are other betting shops in the Norbury High St part of London Rd, including a three unit one operated by William Hill diagonally opposite.

The extension to 1423 will give Paddy Power a much stronger visual image on the road especially given 1423 has a window along its side in Stanford Rd.

The purpose of this application therefore seems to be about increasing Paddy Power’s competitive edge against its rivals in relation to attracting those who place bets or wish to use gaming machines and Fixed Odds Betting Terminals (FOBTs). This only helps to distort the nature of the shopping nature of Norbury High St. It will do nothing to aid the long-term regeneration of Norbury High St a goal of the Love Norbury campaign launched by the four local residents associations.

I oppose the issuing of a licence to Paddy Power to cover 1421 and 1423 London Rd.

I appreciate that the grounds on which the Licensing Authority can refuse a licence appear to be limited, especially in the light of the recent judicial decision overturning of a refusal by Newham Borough Council. However there are a number of issues which the Committee may wish to explore which would could justify outright refusal or warrant deferring a decision until a future meeting.

In particular I believe that the Licensing Authority may have grounds to refuse the application because of Paddy Power’s inability to comply with the two of the three principles set down by the Gambling Commission.

It is the local authority’s wish to preserve the character of the area in which the premises are located. Para 1.6 of the St. Helen’s Road Local Area of Special Character Supplementary Planning Guidance states:

‘ Whilst there will be emphasis on the preservation of existing character the Council will also seek to alleviate environmental problems such as traffic congestion, inadequate parking facilities, lack of trees or inappropriate advertisements.’

The expansion of Paddy Power into another retail contributes to an unwelcome changing of the character of the area.

Licensing Objectives

The three licensing objectives are:

- (1) keeping crime out of gambling
- (2) protecting the vulnerable
- (3) keeping gambling fair and open

Crime and Gambling

It is obviously extremely difficult to evidence what impact a licence will have on crime and disorder, and to measure the impact when so many crimes may be committed as a consequence of heavy losses by customers on FOBTs that, in terms of Police reporting procedures, are never statistically referenced to a betting shop.

Information obtained through a Freedom of Information request to the Gambling Commission shows there were 8,599 incidents of crime reported by betting shop staff on their premises.

The Gambling Commission has admitted that FOBTs present a 'high inherent money laundering risk'. It also says that 40% of the public regularly identify gambling with criminal activity.

Crime Against Staff

The safety and security of betting shop staff has been raised as a subject of serious concern in Parliament. A manager of a betting shop in Morden was attacked and left to die with his body not discovered for two hours because he was manning a shop alone. So staffing levels are clearly relevant matters to considering the relevance of the first two licensing principles.

The Licensing Authority should satisfy itself that Paddy Power is operating at 1421, and will commit to operating at 1421 and 1423, a staffing policy designed to minimise the risk of criminal attack on its staff by ensuring that no one member of staff is left trying to serve and attend customers, ensure that under 18s do not gamble on the premises, deal with angry FOBT players who very often lose more than they can afford, while at the same time trying to ensure that the three licensing objectives are maintained.

The Principal Purpose of Betting Shops

The principle business purpose of a betting shop is betting. FOBTs are ancillary, in the same way as National Lottery terminals are ancillary to other businesses such as newsagents.

It is not clear from the application whether the purpose of the expansion is to increase the area to enable customers to watch sports events, or whether it is to increase the space available for gaming machines and Fixed Odds Betting Terminals (FOBTs).

In a further attempt to maximise revenue on FOBTs, bookmakers have sought to operate shops from 8am through to midnight. Fortunately, Paddy Power does not seem to be requesting that this be the case in relation to 1421 and 1423, but of course there may be nothing to prevent it seeking a licence amendment later. The Licensing Authority should seek clarification on the actual opening hours planned.

Protecting the Vulnerable

There is a risk that with a higher visual presence more people will be enticed to gamble, in the vain hope of a quick financial gain. However, most will be losers and aggravate their existing problems. If people become impoverished as a result of their gambling they may resort to crime, they may be evicted, and their family units may fracture under the resultant stresses. This puts pressure on public services and cuts their providers money.

A high percentage of households in Norbury are vulnerable due to experiencing financial stresses due to cuts in income, benefits, unemployment, rental costs and other price rises. The more they are enticed to gamble the more they compound their vulnerability. Therefore the application will do nothing to aid Principle 2 and should be grounds for refusal.

Many of the local retailers along the Norbury stretch of London Rd struggle to keep afloat. The failure of the food business in 1423 to survive is an example. According to industry figures each FOBT machine grosses about £900 a week. So 24 FOBTs in a small geographic area are worth an estimated £1m a year in profits to the betting industry. This is £1m potentially not going into the local economy through spending in other retail outlets. This creates further vulnerability for other businesses, potentially leading to their closure, an increase in empty shops, the further decline in the retail offer, adding to the desire of better off people to move away and being replaced by lower income more vulnerable households. Declining areas attract criminal activity. Therefore the licence is likely to contribute to the further vulnerability of the residents in the area breaching Principle 2 as well as potentially leading to a breach of Principle 1.

Paddy Power may defend itself by saying that it creates jobs. However, the Gambling Commission has shown that there has been a 6,000 decline in the number of people employed in betting shops since 2009, despite the increase in the number of betting shops over the same period.

Money Laundering

The Gambling Commission's has expressed concern about the potential of FOBTs to enable criminals to money launder their illicit income from things like drug deals. Of course Paddy Power will not know the source of the cash being fed into its FOBTs. Issuing the licence will make it easier for money laundering to take place. The inability of Paddy Power to knowingly prevent money laundering should be seen as grounds for refusing the licence under Principle 1.

Primary Purpose of a Betting Shop

As I understand it under Section 16 'Primary gambling activity' of the 2012 consolidated Licence conditions and codes of practice the primary purpose of a betting shop is betting.

'Gaming machines may be made available for use in licensed betting premises only at times when there are also sufficient facilities for betting available.

Such facilities for betting must include the provision of information that enables the customer to access details of the events on which bets can be made and to be able to place those bets, obtain details of the outcome of the events, calculate the outcome of their bets and be paid or credited with any winnings.

Where licensees provide facilities for betting only by means betting machines (machines which are designed or adapted for the purpose of making or accepting bets on future real events) the licensee must ensure that the number of betting machines is greater than the number of gaming machines which are made available for use in reliance on the premises licence.'

The Licensing Authority should request Paddy Power to provide its income figures on betting and FOBTs for the last two years at 1421. It should also request Paddy Power to provide it with its business projection for the current and next financial year for the licence covering both 1421 and 1423 so that the Committee can be sure that the majority of income is from the primary purpose activity and not from FOBTs. In the event of the income from FOBTs being higher than primary purpose betting, then the Licensing Committee may have grounds to refuse renewal, or place conditions on the license as remedial action to ensure betting is the primary activity and not gaming. In the event of Paddy Power refusing to co-operate with the initial request to provide such information then the Licensing Authority should request the Gambling Commission to use its relevant powers to determine and source any applicable trading information to verify this from Paddy Power, and share it with the Licensing Authority.

Licence Compliance

In considering whether or not to grant a licence to cover the two units as an expansion from the one unit the Licensing Authority should:

- (1) check with the Gambling Commission that Paddy Power has been operating at 1421 in full compliance with the Licence conditions and codes of practice currently in operation (as consolidated in May 2012);
- (2) check with the Gambling Commission that Paddy Power has been operating at its other premises in the Licensing area in full compliance with the Licence conditions and codes of practice currently in operation;
- (3) undertake spot checks to ensure compliance at the 1421 premises especially with regard to the Licence and Code of Practice requirements with regard to social responsibility, children and young people and vulnerable gamblers;
- (4) request the police to report any concerns they have about potential breaches of the conditions and code in the way that Paddy Power has been operating the 1421 premises or other Paddy Power premises in the Licensing area?
- (5) check with the relevant local authority officers whether there have been any waste disposal problems associated with the 1421 premises or other Paddy Power premises in the Licensing area which may suggest that the company is unable to adequately manage its premises.

This checks and requests may require the Licensing Authority to defer consideration of the application.

I hope the above gives the Licensing Authority sufficient grounds either to refuse the application or to defer it for further consideration of the issues discussed.

Yours sincerely,
[Redacted Signature]

London Borough of Croydon
Regulatory Services Licensing Team
10th Floor, Zone B
Development & Environment Department
Bernard Weatherill House
8 Mint Walk
Croydon, CR0 1EA

27 July 2014

Dear Sir or Madam,

Re: Norbury Green Residents' Association objection to the application for a premises licence under the Gambling Act 2005 (Betting Other) from Power Leisure Bookmakers Ltd for Paddy Power, 1421-1423 London Rd, Norbury, SW16 4AH.

Paddy Power already has a betting licence covering 1421 can they prove that there is the demand for them to expand into the neighbouring shop. There are many other betting shops in the Norbury High St part of London Rd, including a three unit one operated by William Hill diagonally opposite.

The extension of Paddy Power into 1423 will give them a much stronger visual image on the London Road especially given 1423 has a window along its side in Stanford Rd. We would suggest that the purpose of this application is to be about increasing Paddy Power's competitive edge against its rivals in relation to attracting those who place bets or wish to use gaming machines and Fixed Odds Betting Terminals (FOBTs). This only helps to distort the nature of the shopping nature of Norbury High St. It will do nothing to aid the long-term regeneration of Norbury High St – a goal of the Love Norbury campaign launched by the four local residents associations.

We, the Norbury Green Residents' Association oppose the issuing of a licence to Paddy Power to cover 1421 and 1423 London Rd.

We appreciate that the grounds on which the Licensing Authority can refuse a licence appear to be limited. However there are a number of issues which the Committee may wish to explore which would could justify outright refusal or warrant deferring a decision until a future meeting. For example the expansion of Paddy Power into another retail premises contributes to an unwelcome changing of the character of the area.

Will the Licensing Authority be able to satisfy itself that Paddy Power is operating at 1421, and will commit to operating at 1421 and 1423, with a staffing policy designed to minimise the risk of criminal attack on its staff by ensuring that no one member of staff is left trying to serve and attend customers, ensure that under 18s do not gamble on the premises, deal with angry FOBT players who very often lose more than they can afford, while at the same time trying to ensure that the three licensing objectives are maintained.

The principle business purpose of a betting shop is betting. FOBTs are ancillary, in the same way as National Lottery terminals are ancillary to other businesses such as newsagents. It is not clear from the application whether the purpose of the expansion is to increase the area to enable customers to watch sports events, or whether it is to increase the space available for gaming machines and Fixed Odds Betting Terminals (FOBTs).

The NGRA fear that there is a risk that with a higher visual presence more people will be enticed to gamble, in the vain hope of a quick financial gain. However, as we know most will be losers and as a result their existing problems escalate. If people become impoverished as a result of their gambling they may resort to crime, they may be evicted from their properties, and their family units may fracture under the resultant stresses. This puts pressure on public services.

A high percentage of households in Norbury are vulnerable and experiencing financial stresses due to cuts in income, benefits, unemployment, rental costs and other price rises. The more they are enticed to gamble the more they compound their vulnerability.

Unfortunately the large amounts of money made by betting shops is not ploughed back into the community from which the money came. The impression of Norbury High Street (London Road) is one of a deprived area, namely created by the large presence of betting shops, i.e. Paddy Power, William Hill and Bet Fred all within a few shops from each other. These shops bring nothing to the area, other than the further decline in the retail premises within the high street. This in turn can result in the more better off residents moving out of the area and being replaced by lower income more vulnerable households. Declining areas attract criminal activity. Therefore the licence is likely to contribute to the further vulnerability of the residents in the area.

Paddy Power may defend itself by saying that it creates jobs. However, the Gambling Commission has shown that there has been a 6,000 decline in the number of people employed in betting shops since 2009, despite the increase in the number of betting shops over the same period, the application does not specify if it indeed intends to provide jobs or whether it will continue with its current staffing level.

The Gambling Commission's has expressed concern about the potential of FOBTs to enable criminals to money launder their illicit income from things like drug deals. Of course Paddy Power will not know the source of the cash being fed into its FOBTs. Issuing the licence will make it easier for money laundering to take place. The inability of Paddy Power to knowingly prevent money laundering should be seen as grounds for refusing the licence under Principle 1.

The Licensing Authority should request Paddy Power to provide its income figures on betting and FOBTs for the last two years at 1421. It should also request Paddy Power to provide it with its business projection for the current and next financial year for the licence covering both 1421 and 1423 so that the Committee can be sure that the majority of income is from the primary purpose activity and not from FOBTs. In the event of the income from FOBTs being higher than primary purpose betting, then the Licensing Committee may have grounds to refuse renewal, or place conditions on the license as remedial action to ensure betting is the primary activity and not gaming. In the event of Paddy Power refusing to co-operate with the initial request to provide such information then the Licensing Authority should request the Gambling Commission to use its relevant powers to determine and source any applicable trading information to verify this from Paddy Power, and share it with the Licensing Authority.

Licence Compliance

In considering whether or not to grant a licence to cover the two units as an expansion from the one unit the Licensing Authority should:

- (1) check with the Gambling Commission that Paddy Power has been operating at 1421 in full compliance with the Licence conditions and codes of practice currently in operation (as consolidated in May 2012);
- (2) check with the Gambling Commission that Paddy Power has been operating at its other premises in the Licensing area in full compliance with the Licence conditions and codes of practice currently in operation;
- (3) undertake spot checks to ensure compliance at the 1421 premises especially with regard to the Licence and Code of Practice requirements with regard to social responsibility, children and young people and vulnerable gamblers;
- (4) request the police to report any concerns they have about potential breaches of the conditions and code in the way that Paddy Power has been operating the 1421 premises or other Paddy Power premises in the Licensing area?
- (5) check with the relevant local authority officers whether there have been any waste disposal problems associated with the 1421 premises or other Paddy Power premises in the Licensing area which may suggest that the company is unable to adequately manage its premises.

This checks and requests may require the Licensing Authority to defer consideration of the application.

I hope the above gives the Licensing Authority sufficient grounds either to refuse the application or to defer it for further consideration of the issues discussed.

Yours sincerely


Chair, Norbury Green Residents' Association

From: [REDACTED] [mailto:[REDACTED]]
Sent: 27 July 2014 23:00
To: LICENSING
Subject: PaddyPower Extension in Norbury

Dear Licensing Department,

I am writing to oppose the proposed doubling in size of the PaddyPower betting shop on London Road in Norbury, SW16.

We already have sufficient betting services in Norbury and increasing the size of the PaddyPower shop will provide further opportunities for hard-pressed local residents to lose money and get addicted to gambling and so increase social problems in the area.

For these reasons, I ask you to reject the extension of the shop.

Yours faithfully

[REDACTED]
[REDACTED] Briar Avenue
Norbury
London
SW16 [REDACTED]
Mobile: [REDACTED]

From: [redacted] [mailto:[redacted]]
Sent: 28 July 2014 08:08
To: LICENSING
Subject: Objection to premises licence for Paddy Power, 1421-1423 London Road, Norbury

TO WHOM IT MAY CONCERN

I would like to object to the application by Paddy Power in Norbury.

Any expansion of this business would only help to distort the nature of the shopping nature of Norbury High St. It will do nothing to aid the long-term regeneration of Norbury High St – a goal of the Love Norbury campaign that was recently launched by the four local residents associations.

I completely oppose the issuing of a licence to Paddy Power to cover 1421 and 1423 London Rd.

The current shop is unsightly and regularly attract street drinkers who are drunk on the street at all times of the day. It's unpleasant for local people who live and work in the area. Extending their premises to a larger unit would only serve to increase this anti-social behaviour.

Will the Licensing Authority be able to satisfy itself that Paddy Power is operating at 1421, and will commit to operating at 1421 and 1423, with a staffing policy designed to minimise the risk of criminal attack on its staff by ensuring that no one member of staff is left trying to serve and attend customers, ensure that under 18s do not gamble on the premises, deal with angry FOBT players who very often lose more than they can afford, while at the same time trying to ensure that the three licensing objectives are maintained.

I fear that with a higher visual presence more people will be enticed to gamble, in the vain hope of a quick financial gain. However, as we know most will be losers and as a result their existing problems escalate. If people become impoverished as a result of their gambling they may resort to crime, they may be evicted from their properties, and their family units may fracture under the resultant stresses. This puts pressure on public services.

Unfortunately the large amounts of money made by betting shops is not ploughed back into the community from which the money came. The impression of Norbury High Street (London Road) is one of a deprived area, namely created by the large presence of betting shops, i.e. Paddy Power, William Hill and Bet Fred all within a few shops from each other. These shops bring nothing to the area, other than the further decline in the retail premises within the high street. This in turn can result in the more better off residents moving out of the area and being replaced by lower income more vulnerable households. Declining areas attract criminal activity. Therefore the licence is likely to contribute to the further vulnerability of the residents in the area.

Licence Compliance

In considering whether or not to grant a licence to cover the two units as an expansion from the one unit the Licensing Authority should:

- (1) check with the Gambling Commission that Paddy Power has been operating at 1421 in full compliance with the Licence conditions and codes of practice currently in operation (as consolidated in May 2012);

- (2) check with the Gambling Commission that Paddy Power has been operating at its other premises in the Licensing area in full compliance with the Licence conditions and codes of practice currently in operation;
- (3) undertake spot checks to ensure compliance at the 1421 premises especially with regard to the Licence and Code of Practice requirements with regard to social responsibility, children and young people and vulnerable gamblers;
- (4) request the police to report any concerns they have about potential breaches of the conditions and code in the way that Paddy Power has been operating the 1421 premises or other Paddy Power premises in the Licensing area?
- (5) check with the relevant local authority officers whether there have been any waste disposal problems associated with the 1421 premises or other Paddy Power premises in the Licensing area which may suggest that the company is unable to adequately manage its premises.

This checks and requests may require the Licensing Authority to defer consideration of the application.

I hope the above gives the Licensing Authority sufficient grounds either to refuse the application or to defer it for further consideration of the issues discussed.

Regards,

[Redacted Name]

Media Consultant

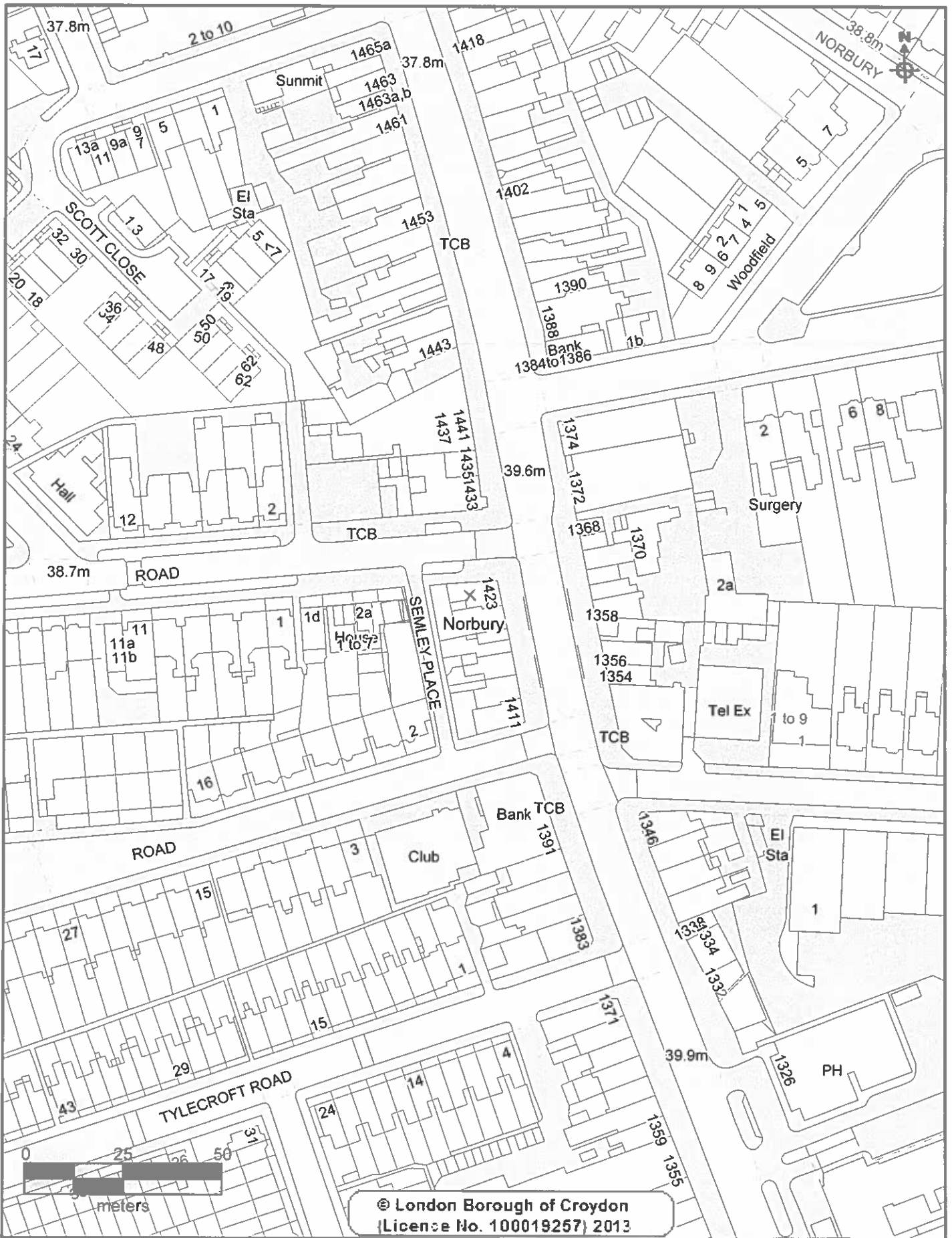
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06-Oct-2014

X = 1421-23 LONDON ROAD

