

Licensing Sub-Committee Agenda



To: Councillor Karen Jewitt (Chair), Margaret Bird, Nina Degradis

A meeting of the **Licensing Sub-Committee** which you are hereby summoned to attend, will be held **Thursday, 23 June 2022 at 10.30 am. This meeting will be held remotely** and Members will be sent the link to attend the meeting. To view the meeting, please click [here](#).

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Wednesday 15 June 2022

Members of the public are welcome to watch the webcast both live and after the meeting has completed at <http://webcasting.croydon.gov.uk>

The agenda papers for all Council meetings are available on the Council website www.croydon.gov.uk/meetings

If you require any assistance, please contact Jayde Watts as detailed above.

AGENDA

1. Appointment of Chair

To appoint a Chair for the duration of the meeting.

2. Apologies for Absence

To receive any apologies for absence from any members of the Committee.

3. Disclosure of Interests

Members and co-opted Members of the Council are reminded that, in accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, they are required to consider in advance of each meeting whether they have a disclosable pecuniary interest (DPI), an other registrable interest (ORI) or a non-registrable interest (NRI) in relation to any matter on the agenda. If advice is needed, Members should contact the Monitoring Officer in good time before the meeting.

If any Member or co-opted Member of the Council identifies a DPI or ORI which they have not already registered on the Council's register of interests or which requires updating, they should complete the disclosure form which can be obtained from Democratic Services at any time, copies of which will be available at the meeting for return to the Monitoring Officer.

Members and co-opted Members are required to disclose any DPIs and ORIs at the meeting.

- Where the matter relates to a DPI they may not participate in any discussion or vote on the matter and must not stay in the meeting unless granted a dispensation.
- Where the matter relates to an ORI they may not vote on the matter unless granted a dispensation.
- Where a Member or co-opted Member has an NRI which directly relates to their financial interest or wellbeing, or that of a relative or close associate, they must disclose the interest at the meeting, may not take part in any discussion or vote on the matter and must not stay in the meeting unless granted a dispensation. Where a matter affects the NRI of a Member or co-opted Member, section 9 of Appendix B of the Code of Conduct sets out the test which must be applied by the Member to decide whether disclosure is required.

The Chair will invite Members to make their disclosure orally at the commencement of Agenda item 3, to be recorded in the minutes.

4. Urgent Business (if any)

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

5. GAMBLING ACT 2005 - Application for a Bingo Premises Licence at 1432-1434 London Road, Norbury, SW16 4BZ

The Sub-Committee is asked to determine whether to grant the application for a Bingo Premises Licence at 1432-1434 London Road, Norbury, SW16 4BZ.

6. Exclusion of the Press and Public

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

“That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended.”

PART B

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REPORT TO:	LICENSING SUB COMMITTEE Thursday 23 June 2022
AGENDA ITEM:	
SUBJECT:	GAMBLING ACT 2005 – APPLICATION FOR PREMISES LICENCE – BINGO
LEAD OFFICER:	Corporate Director, Sustainable Communities, Regeneration & Economic Recovery
CABINET MEMBER:	Cllr. Scott Roche Streets & Environment
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 Bingo Premises Licence at 1432-1434 London Road, Norbury, SW16 4BZ.

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, (Bingo) 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: to grant the application, to vary the application, with or without further conditions, or to refuse the application.

5 Savings/ future efficiencies

None identified.

6 (Approved by: Flora Osiyemi, Head of Finance Place, Residents & Gateway)

6. COMMENTS OF THE SOLICITOR TO THE COUNCIL

6.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that 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 Sandra Herbert, Head of Litigation and Corporate law on behalf of the Director of Law and Governance and Deputy Monitoring Officer).

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 for and on behalf of HR by Jennifer Sankar, Head of HR Place)

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. In exercising licensing functions, the Council is required to comply with Section 149 of the Equality Act 2010 which requires public bodies to have due regard to the need to:

- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- Foster good relations between people who share a protected characteristic and people who do not share it.

- 8.2 For these purposes the protected characteristics are

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

- 8.3 The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.

- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

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

10.2 Officers comments and relevant representations on the impact of the application on these objectives appear in Appendix A to the application.

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 Protocols agreed in relation to Licensing Hearings are within the Council's Constitution and will be accessible as part of the Council's Publication Scheme maintained under the Freedom of Information Act.
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CONTACT OFFICER: Michael Goddard, Head of Environmental Health,
Trading Standards and Licensing, Sustainable
Communities Department, ext. 61838

BACKGROUND DOCUMENTS: Application Forms
Licensing Hearings Protocol and Procedure

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1. The Application

This report concerns an application made under section 159 of the Gambling Act 2005 (the Act) by Merkur Slots UK Limited for a Premises Licence (Bingo) at 1432-1434 London Road, Norbury, SW16 4BZ.

- 1.1 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.
- 1.2 A Bingo premises licence permits –
 - Bingo
 - Prize gaming
 - Making available for use a number of Category B machines not exceeding 20% of the total number of gaming machines that are available at the premises and any number of Category C or D machines. Category B machines should be restricted to sub category B3 or B4 machines but not B3A machines.
- 1.4 The Gambling Act 2005 does not define Bingo but defines gaming as prize gaming if the nature and size of the prize is not determined by the number of people playing or the amount paid for or raised by the gaming. Normally the prizes are determined by the operator before play commences.
- 1.5 Taken from the Gambling Commission Guidance to Local Authorities, attached at Appendix A1 is the Summary of Machine Provisions by premises and the Summary of Gaming Machine Categories and Entitlements.
- 1.6 Attached at Appendix A2 is Part 9 from the Gambling Commission Guidance to Local Authorities which concerns Premises Licence conditions.
- 1.7 Attached at Appendix A3 is Part 18 from the Gambling Commission Guidance to Local Authorities which concerns licensed Bingo premises and this also includes the specific Mandatory and Default conditions that would automatically be attached to a Bingo Premises Licence, if granted.
- 1.8 Attached at Appendix A4 is a copy of the application for the premises licence and accompanying documentation that the applicant submitted with their application and this includes a Local Area Risk Assessment. At section 20 in the application form, the applicant sets out conditions that they consider appropriate to be placed on the licence, if granted and this includes closing times on given days of the week.
- 1.9 Following discussions with the Police Licensing Officer in the consultation period on the application, the applicant has amended their application to have the following two conditions added to the licence, if granted –

- A maglock will be installed and available for use by staff
- There will be no pre-planned single staffing after 8pm daily

2. Relevant representations

- 2.1 Interested parties have made representations on this application and copies are attached at Appendix A5.
- 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. 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 Sustainable Communities 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 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 which the authority seeks to promote through this Statement of Principles. 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.*

It should be noted that the Gambling Commission has stated: 'The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling'. The Council is aware of the National Strategy to Reduce Gambling Harms and the importance of close working between teams to deliver important results in promoting the third licensing objective of 'protecting children and other vulnerable persons from being harmed or exploited by gambling'. A database of national, regional and local initiatives can be found on the Commission website.

The Council is aware that, as provided by 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. The Guidance makes clear that Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.

It is appreciated that as per the Guidance for local authorities "moral or ethical objections to gambling are not a valid reason to reject applications for premises licences" In addition, whereas previous legislation required that the grant of certain gambling permissions should take account of whether there was unfulfilled demand for the facilities, this is no longer the case and each application must be considered on its merits without regard to demand.

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.*

Croydon is a very diverse borough, both culturally and socio economically and also has areas where levels of crime and disorder and anti-social behaviour are more prevalent than in others.

The Gambling Commission's Licence Conditions and Codes of Practice (LCCP), formalise the need for operators to consider local risks. The current version, effective from 31 October 2020, is available on the Gambling Commission's website.

In this regard, operators are specifically referred to the Social Responsibility (SR) code 10.1.1 which requires all premises licensees to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In undertaking their risk assessments, they must take into account relevant matters identified in the Council's statement of licensing policy (Statement of Principles).

This Council expects all operators to prepare robust and considered assessments of the local risks to the licensing objectives posed by the provision of gambling facilities at the application premises and address any factors that may have a negative impact

on the licensing objectives. In addition, the Council expects all operators to review (and update as necessary) their local risk assessments:

- to take account of significant changes in local circumstances, including those identified in this statement of licensing policy;*
- when there are significant changes at a licensee's premises that may affect their mitigation of local risks;*
- when applying for a variation of a premises licence; and*
- in any case, undertake a local risk assessment when applying for a new premises licence.*

It is not possible to provide a complete list of factors to consider in relation to the risk assessment but the following are examples of the factors the Council would expect gambling operators to consider –

- The location of schools, sixth form colleges and youth centres in the local area of the licensed or application premises, with reference to the potential risk of under age gambling or the direct exposure to gambling by under age persons as a result and the mitigation measures the operator intends to introduce to reduce any such risks;*
- The location of hostels or places offering support services for vulnerable people, such as those with addiction issues in the local area of the licensed or application premises. The Council expects operators to give very careful consideration to the suitability of locating new licensed premises close to such sensitive premises, or to varying the terms of existing licenses in such areas, given the greater risk of problem gambling amongst these groups and would expect to see clear and robust mitigation measures from the operator on how they would intend to reduce any such risks;*
- Any reasonably available information about issues with problem gambling in the area of the licensed or application process. In assessing the negative impact premises may have on the licensing objectives, the Council will expect operators to include consideration of the existing density of licensed gambling premises and the status of the night time economy in the area local to their licensed or application premises. The Council will expect operators to particularly assess the risk of gambling being a source of crime, being associated with crime or being used to support crime in that area and to set out any mitigation measures they would intend to introduce to reduce any such risks.*
- The Council will expect operators, perhaps in prior discussions with the Police, to assess patterns of crime, disorder and anti-social behaviour in the area local to the licensed or application premises, specifically that linked to gambling premises and set out the measures they believe will mitigate any risks of their premises having a negative impact on those crime etc. patterns.*

While none of the above preclude any application being made and each application will be decided on its merits, it is expected that any application will demonstrate how potential risks/concerns can be overcome.

The Council will expect licensees to share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise at the request of the licensing authority, such as, for example, when there is an inspection of a premises. Ideally, a copy of the current local area risk assessments will be kept at the licensed premises.

Local Area Profiles

The Council is aware of the Gambling Commission recommendation that licensing authorities map and prepare their own assessments of local risks, in the form of local area profiles. Such profiles will be prepared and be available for operators to utilise when preparing their risk assessments through a specific request to the Council licensing team.

Undoubtedly, such local areas profiles will develop over time but at the outset, to assist operators, they will incorporate data on the matters listed above.

Duplication with other regulatory regimes - *The Council will seek to avoid any duplication with other statutory/regulatory systems where possible, including planning. The Council will not consider whether a licence application is likely to be awarded planning permission or building regulations approval, in its consideration of it. It will, however, listen to, and consider carefully, any concerns about conditions which are not able to be met by licensees due to planning restrictions, should such a situation arise. Operators are also reminded of the 'Sui Generis Use Class' status of betting shops in the Planning context which came into being in 2016.*

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 takes 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 carefully consider the effect on the licensing objectives of gambling premises being located in this area and whether additional conditions may be appropriate. The Council is aware of the distinction between disorder and nuisance and in determining whether disorder may occur, will consider factors such as whether police assistance was required and how threatening the behaviour was to those who could see or hear 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 and is aware of the content of the following paragraphs in the statutory guidance –

The Gambling Act 2005 permits the advertising of gambling in all forms, provided that it is legal and there are adequate protections in place to prevent such advertisements undermining the licensing objectives. The Advertising Standards Authority (ASA) is the UK's independent regulator of advertising. It enforces the UK Advertising Codes (the Codes), written by the Committees of Advertising Practice. The Codes cover the content and placement of advertising and are designed to ensure that advertisements for gambling products are socially responsible, with particular regard to the need to protect children, young persons under 18 and other vulnerable persons from being harmed or exploited. The Codes also require that advertisements for gambling products or services do not mislead. Any complaint about the content and placement of advertising or marketing communications should be sent directly to the ASA. (1.19)

The LCCP requires licensees to ensure that their policies and procedures for preventing underage gambling take account of the structure and layout of their gambling premises. This therefore requires licensees not only to be able to supervise their premises but also that they should mitigate the risks of under 18s being attracted to enter premises by the products available within them. Where a licensing authority has concerns that such products are visible, they could for example require the licensee to re-site the products out of view. (7.29)

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*

The Council will make itself aware of the Codes of Practice which the Gambling Commission issues as regards this licensing objective, in relation to specific premises. In addition, the Council is aware of the concerns set out by the Gambling Commission in their briefing paper entitled 'Gambling-related harm as a public health issue' dated February 2018, of the advice to local authorities from the Local Government Association in their document entitled 'Tackling gambling related harm – A whole Council approach', last updated in November 2018 and of the National Strategy to Reduce Gambling Harms, which was most recently updated on 8 December 2020.

The Council is also aware of the Social Responsibility Charter for Gaming Machines in Pubs, produced by the British Beer & Pub Association (BBPA) and UK Hospitality, which 'sets out a Code of Practice with regards to gaming machines in pubs, and in particular the steps to take to tackle and prevent under-age players of these machines.'

As regards the term "vulnerable persons" it is noted that the Gambling Commission is not seeking to offer a definition but states that "it will for regulatory purposes

assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs.” In relation to this licensing objective, the Council will consider each application on a case by case basis. Should a practical definition prove possible in future then this policy statement will be updated.

Conditions – *The starting point when considering an application is that it will be granted subject only to the mandatory and default conditions and additional conditions will only be imposed where there is evidence of a risk to the licensing objectives, such that there is a need to supplement the existing mandatory and default conditions.*

Any additional 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 additional conditions will be made on a case by case basis, although there will be a number of measures that the Council will consider utilising should there be a perceived need. There are specific comments made in this regard under some of the licence types below.

The Council may consider measures to meet the licensing objectives, such as:

- *leaflets giving assistance to problem gambling to be clearly displayed in all areas of the premises*
- *self exclusion forms to be made available for customer use*
- *machines such as fixed odds betting terminals to clearly display odds*
- *ATM or cash terminals to be sited away from gaming machines*
- *Details of the GamCare helpline and website to be displayed prominently in premises*

The Council will also consider specific measures which may be required for buildings which are subject to multiple premises licences. Such measures may include the supervision of entrances; segregation of gambling from non-gambling areas frequented by children; and the supervision of gaming machines in non-adult gambling specific premises in order to pursue the licensing objectives. These matters are in accordance with the Guidance.

The Council will also ensure that where category C or above machines are on offer in premises to which children are admitted:

- *all such machines are located in an area of the premises which is separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance;*
- *only adults are admitted to the area where these machines are located;*
- *access to the area where the machines are located is supervised;*
- *the area where these machines are located is arranged so that it can be observed by the staff or the licence holder; and*
- *at the entrance to and inside any such areas there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.*

These considerations will apply to premises including buildings where multiple premises licences are applicable.

A summary of machine provisions by premises is provided in Appendix A and a summary of gaming machine categories and entitlements in Appendix B of the Statutory Guidance published by the Gambling Commission.

The Council is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. There cannot be more than one premises licence covering the same area of the track. As per the Guidance, the Council will consider the impact upon the third licensing objective and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

It is noted that there are conditions which the Council cannot attach to premises licences which are:

- any condition on the premises licence which makes it impossible to comply with an operating licence condition;*
- conditions relating to gaming machine categories, numbers, or method of operation;*
- conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated); and conditions in relation to stakes, fees, winning or prizes.*

Door Supervisors – *this Council notes that licensing authorities may consider whether there is a need for door supervisors in terms of the licensing objectives of protecting children and vulnerable persons from being harmed or exploited by gambling, and also in terms of preventing premises becoming a source of crime. Whilst there is currently no apparent evidence that the operation of betting offices requires door supervisors for the protection of the public, this authority will consider making a door supervision requirement with regard to a betting office if there is clear evidence from the history of trading at the premises that the premises cannot be adequately supervised from the counter and/or that door supervision is both necessary and proportionate.*

Where operators and the Council decide that supervision of entrances/machines is appropriate for particular cases, it will need to be decided whether these staff need to be Security Industry Authority (SIA) licensed or not. Furthermore, if a person carries out ‘door supervisor’ duties but is exempt from the requirement to be licensed by the SIA, the Council will expect that person to be trained to a nationally recognised standard and be able to show that they have undergone relevant and appropriate police records checks. Door supervision will not, however be seen in isolation as the only remedy for concerns and the Council will consider other options, if considered appropriate, to achieve the licensing objectives.

5. Bingo premises

The Council notes that the Guidance states:

Licensing authorities need to satisfy themselves that bingo can be played in any bingo premises for which they issue a premises licence. An operator may choose to vary their licence to exclude a previously licensed area of that premises, and then

apply for a new premises licence, or multiple new premises licences, with the aim of creating separate premises in that area. Essentially providing multiple licensed premises within a single building or site. Before issuing additional bingo premises licences, licensing authorities need to consider whether bingo can be played at each of those new premises (18.5).

Children and young people are allowed into bingo premises; however they are not permitted to participate in the bingo and if category B or C machines are made available for use these must be separated from areas where children and young people are allowed. Social Responsibility (SR) code 3.2.5 (3) states that 'licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises' in order to prevent underage gambling (18.7).

S.172(7) (of the Act), as amended, provides that the holder of a bingo premises licence may make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines on the premises. For example, a premises with a total of 25 gaming machines available for use can make five or fewer category B3 gaming machines available on that premises. Premises that were licensed before 13 July 2011 are entitled to make available eight category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. There are no restrictions on the number of category C or D machines that can be made available. Regulations state that category B machines at bingo premises are restricted to sub-category B3 (SI 2007/2158: Categories of Gaming Machine Regulations 2007) (but not B3A) and B4 machines. Licensing authorities should ensure that gambling machines are made available for use in a manner consistent with our guidance within Part 16. For the purpose of calculating the category B machine entitlement in gambling premises, gaming machines should only be counted if they can be played simultaneously by different players without physical hindrance. This includes tablets. (18.8)

The gaming machines must remain within the licensed area covered by the premises licence. In the unusual circumstance that an existing bingo premises covered by one premises licence applies to vary the licence and acquire additional bingo premises licences (so that the area that was the subject of a single licence will become divided between a number of separate licensed premises) it is not ``permissible for all of the gaming machines to which each of the licences brings an entitlement to be grouped together within one of the licensed premises (18.9).

The Council will have regard to the Guidance on the issues that licensing authorities should take into account in relation to the suitability and layout of bingo premises.

10. Reviews

Requests for a review of a premises licence can be made by interested parties or responsible authorities however, it is for the Council to decide whether the review is to be carried-out. This will be on the basis of whether the request for the review is relevant to the matters listed below, in that the request is:

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

As licensing authorities are required to permit the use of premises for gambling, in so far as it is in accordance with the s.153 principles, applications that raise general objections to gambling as an activity, that relate to demand for gambling premises, or raise issues relating to planning, public safety, and traffic congestion are unlikely to be considered an appropriate basis for review, leading to rejection under the bullet points above.

In addition, consideration will be given as to whether the request for review is frivolous, vexatious, would not cause the Council to wish to alter/ revoke/suspend the licence or to remove, amend or attach conditions on the premises licence, or whether it is substantially the same as previous representations or requests for review.

The Council can also initiate a review of a licence on the basis of any reason which it thinks is appropriate. In doing so, the Council will be mindful of the fact that licensing authority actions, including reviews, should be in pursuit of the principles set out in s.153 of the Act or underpinned by reasonable concerns, such as changes to the local environment or resident complaints.

3.2 An ordnance survey extract map is attached at Appendix A6 showing the location of the premises.

36.45 Whilst of limited use due to the absence of a central database and the ability to share information with other authorities, licensing authorities may wish to consider the use of police cautions as a deterrent.

Case law, templates and case studies

36.46 Supplementary enforcement and compliance materials are available on the Commission's website including case law, sample conditions, letter templates and examples of circumstances in which LAs have made effective use of their powers under the Act in the LA Toolkit.

Appendix A: Summary of machine provisions by premises

Premises type	Machine category						
	A	B1	B2	B3	B4	C	D
Large casino (machine/table ratio of 5-1 up to maximum)	Maximum of 150 machines Any combination of machines in categories B to D (except B3A machines), within the total limit of 150 (subject to machine/table ratio)	Maximum of 150 machines Any combination of machines in categories B to D (except B3A machines), within the total limit of 150 (subject to machine/table ratio)	Maximum of 150 machines Any combination of machines in categories B to D (except B3A machines), within the total limit of 150 (subject to machine/table ratio)	Any combination of machines in categories B to D (except B3A machines), within the total limit of 150 (subject to machine/table ratio)	Any combination of machines in categories B to D (except B3A machines), within the total limit of 150 (subject to machine/table ratio)	Any combination of machines in categories B to D (except B3A machines), within the total limit of 150 (subject to machine/table ratio)	Any combination of machines in categories B to D (except B3A machines), within the total limit of 150 (subject to machine/table ratio)
Small casino (machine/table ratio of 2-1 up to maximum)	Maximum of 80 machines Any combination of machines in categories B to D (except B3A machines), within the total limit of 80 (subject to machine/table ratio)	Maximum of 80 machines Any combination of machines in categories B to D (except B3A machines), within the total limit of 80 (subject to machine/table ratio)	Maximum of 80 machines Any combination of machines in categories B to D (except B3A machines), within the total limit of 80 (subject to machine/table ratio)	Maximum of 80 machines Any combination of machines in categories B to D (except B3A machines), within the total limit of 80 (subject to machine/table ratio)	Any combination of machines in categories B to D (except B3A machines), within the total limit of 80 (subject to machine/table ratio)	Any combination of machines in categories B to D (except B3A machines), within the total limit of 80 (subject to machine/table ratio)	Any combination of machines in categories B to D (except B3A machines), within the total limit of 80 (subject to machine/table ratio)

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	Machine category					
	80 (subject to machine/table ratio)	80 (subject to machine/table ratio)	80 (subject to machine/table ratio)	machine/table ratio)	machine/table ratio)	machine/table ratio)
Pre-2005 Act casino(no machine/table ratio)	Maximum of 20 machines categories B to D (except B3A machines), or any number of C or D machines instead	Maximum of 20 machines categories B to D (except B3A machines), or any number of C or D machines instead	Maximum of 20 machines categories B to D (except B3A machines), or any number of C or D machines instead	Maximum of 20 machines categories B to D (except B3A machines), or any number of C or D machines instead	Maximum of 20 machines categories B to D (except B3A machines), or any number of C or D machines instead	Maximum of 20 machines categories B to D (except B3A machines), or any number of C or D machines instead
Betting premises and tracks occupied by pool betting		Maximum of 4 machines categories B2 to D (except B3A machines)	Maximum of 4 machines categories B2 to D (except B3A machines)	Maximum of 4 machines categories B2 to D (except B3A machines)	Maximum of 4 machines categories B2 to D (except B3A machines)	Maximum of 4 machines categories B2 to D (except B3A machines)
Bingo premises ¹			Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4	Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4	Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4	No limit on category C or D machines
Adult gaming centre ²			Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4	Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4	Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4	No limit on category C or D machines
Licensed family entertainment centre ³						No limit on category C or D machines
Family entertainment						No limit on category D machines

A1

centre (with permit) ³	Machine category			
	Clubs or miners' welfare institute (with permits) ⁴	Maximum of 3 machines in categories B3A or B4 to D	Maximum of 3 machines in categories B3A or B4 to D	Maximum of 3 machines in categories B3A or B4 to D
Qualifying alcohol-licensed premises			1 or 2 machines of category C or D automatic upon notification	1 or 2 machines of category C or D automatic upon notification
Qualifying alcohol-licensed premises (with licensed premises gaming machine permit)			Number of category C-D machines as specified on permit	Number of category C-D machines as specified on permit
Travelling fair				No limit on category D machines

Appendix B: Summary of gaming machine categories and entitlements

Category of machine	Maximum stake (from April 2019)	Maximum prize (from Jan 2014)
A	Unlimited – No category A gaming machines are currently permitted	Unlimited – No category A gaming machines are currently permitted
B1	£5	£10,000 [†]
B2	£2	£500
B3A	£2	£500
B3	£2	£500
B4	£2	£400

Category of machine	Maximum stake (from April 2019)	Maximum prize (from Jan 2014)
C	£1	£100
D – non-money prize	30p	£8
D – non-money prize (crane grab machines only)	£1	£50
D – money prize	10p	£5
D – combined money and non-money prize	10p	£8 (of which no more than £5 may be a money prize)
D – combined money and non-money prize (coin pusher or penny falls machines only)	20p	£20 (of which no more than £10 may be a money prize)

Appendix C: Summary of gaming entitlements for clubs and alcohol-licensed premises

	Members' club or MW institute with club gaming permit	Clubs established to provide facilities for gaming of a prescribed kind (currently bridge or whist clubs)	Members' club or commercial club with club machine permit	Members' club, commercial club or MW institute without a club gaming permit or club machine permit	Pubs and other alcohol-licensed premises
Equal chance gaming	Yes	Bridge and/or Whist only	Yes	Yes	Yes
Limits on stakes	No limit	No limit	Poker £1000 / week £250 / day £10 /person per game Other gaming No limit	Poker £1000 / week £250 / day £10 /person per game Other gaming No limit	Poker £100 / premises per day Other gaming £5 / person per game Cribbage &

Part 9: Premises licence conditions

A2

Introduction

9.1 The Act provides that licences may be subject to conditions in a number of ways:

- they may attach automatically, having been set out on the face of the Act
- they may attach through regulations made by the Secretary of State or Scottish Ministers
- they may be attached to operating and personal licences by the Commission
- they may be attached to premises licences by licensing authorities.

9.2 Conditions may sometimes be general in nature attaching to all licences or all licences of a particular class, or they may be specific to a particular licence.

9.3 Conditions on premises licences should relate only to gambling, as considered appropriate in the light of the principles to be applied by licensing authorities under s.153. Accordingly, if the Commission's Licence conditions and codes of practice (LCCP) or other legislation places particular responsibilities or restrictions on an employer or the operator of premises, it is not appropriate to impose the same through conditions on a premises licence.

Conditions and authorisations by virtue of the Act

9.4 The following paragraphs set out specific sections of the Act that provide for conditions to be attached automatically to premises licences, or for authorisations to be granted automatically. The Secretary of State/Scottish Ministers may make regulations requiring these conditions to be set out on the premises licence, and there is no discretion to decide not to include them or to modify them. The table after paragraph 9.18 summarises which sections of the Act apply to which types of premises licences.

S.172 – number of gaming machines

9.5 S.172 provides for premises licences to permit a specified number of gaming machines of particular categories in each type of gambling premises. These permissions are set out in detail in Part 16 of this guidance.

A2

S.173 – betting on virtual events

9.6 S.173 authorises the holder of a casino premises licence or a betting premises licence to make facilities available for betting on virtual events. This is separate from betting on virtual events by means of a gaming machine. It is intended to cover facilities such as virtual horse and greyhound racing which are person-to-person transactions, involving virtual images that are not displayed on a machine.

S.174 – gambling in addition to casino games

9.7 S.174 authorises the holder of a casino premises licence for a small or large casino to make available the following types of gambling in addition to casino games:

- equal chance games
- betting – but not in pre-2005 Act casinos with grandfather rights and only with a betting operating licence
- bingo – but only in large casinos and only with a bingo operating licence.

9.8 For the purposes of the Act, equal chance games are ones which do not involve playing or staking against a bank and in which the chances are equally favourable to all players. Licensing authorities must not restrict the equal chance gaming available nor prohibit casino games that have not been prohibited by the Commission. Part 17 of this guidance provides details of the casino games authorised by the Commission.

S.176 – access by children and young persons to casinos

9.9 S.176 requires the Commission to issue at least one code of practice about access to casino premises for children and young persons. In particular, the code must:

- specify steps that the premises licence holder must take to ensure that under-18s do not enter casino premises, including ensuring that each entrance to the casino is supervised by at least one person who is responsible for compliance with the code of practice
- require that, unless the supervisor is certain that a person seeking admittance is an adult, evidence of age must be provided by those seeking to enter the casino or gambling area.

A2

9.10 S.176 makes it a condition of the premises licence that the licensee must comply with the code of practice issued by the Commission. Licensing authorities should note that the requirement under s.176 for supervision at each entrance is separate to any other condition that may be attached relating to 'door supervision' more generally.

S.177 – giving of credit

9.11 S.177 attaches a condition to casino premises licences and bingo premises licences that prohibits the licensee from:

- giving credit in connection with the gambling taking place on the premises
- participating in, arranging, permitting or knowingly facilitating the giving of credit in connection with the gambling on the premises.

9.12 However, s.177 does not prevent the licensee from contracting a third party to install cash dispensers (ATMs) on their premises, which may accept both credit and debit cards. Such an arrangement is subject to requirements that the premises licence holder has no other commercial connection in relation to gambling with the provider of the ATMs (aside from the agreement to site the machines), does not profit from the arrangement, and does not make any payment in connection with the machines. All premises licences also include a mandatory condition which requires that any ATM made available for use on the premises must be located in a place that requires any customer who wishes to use it to cease gambling in order to do so (Part 1(5) of The Gambling Act 2005 (Mandatory and Default Conditions) Regulations).

9.13 S.177 deals with the prohibition of credit in respect of casino and bingo premises licences. However equivalent prohibitions are placed on bingo and casino operating licences, as set out in s.81 of the Act, credit and inducements.

S.178 – door supervision

9.14 If a licensing authority attaches a condition relating to door supervision, and the person carrying out those duties are required by the Private Security Industry Act 2001 (opens in new tab) (PSIA) to hold a licence, s. 178 of the Gambling Act 2005 (opens in new tab) prescribes that the requirement under PSIA will be treated as if it were a condition of the premises licence. There is, however, an exemption from the

PSIA licensing requirement for in-house employees working as door supervisors at casino and bingo premises, details of which can be found in Part 33 of this guidance.

A2

9.15 S.178 defines door supervision as requiring someone to be responsible for 'guarding the premises against unauthorised access or occupation, against outbreaks of disorder or against damage'.

S.179 – pool betting

9.16 S.179 provides that a betting premises licence in respect of a track may not authorise pool betting to take place, other than in respect of dog or horse racing and only where the acceptance of bets is by the holder of the betting premises licence, or in accordance with arrangements made by them. In the case of dog racing, this preserves the existing arrangements at dog tracks where the totalisator is operated by or on behalf of the occupier of the track.

S.182 – access by children and young persons to tracks

9.17 S.182 applies only to a betting premises licences in respect of tracks. It requires the licensee to ensure that children and young persons are excluded from any area in which facilities for betting are provided and from any area where a gaming machine (other than a category D gaming machine) is situated. The exception to this, for betting areas only, is on race days at dog and horse racing tracks, that is on those days when racing occurs or is expected to take place. In those cases, under-18s may have access to betting areas but licensing authorities should note that this exception does not affect the prohibition on betting by children and young persons.

S.183 – Christmas day

9.18 S.183 applies a condition to all premises licences that facilities for gambling must not be provided on Christmas day, namely the period of 00.01 hours on 25 December until 00.00 hours on 26 December.

Section of the Act

A2

Type of premises licence	Section of the Act								
	s.172	s.173	s.174	s.176	s.177	s.178	s.179	s.182	s.183
All premises licences	x					x			x
Bingo premises licences					x				
Casino premises licences		x		x	x				
Small casinos			x						
Large casinos			x						
Betting premises licences		x							
Betting premises licence in respect of a track							x	x	

Conditions attached through regulations made by the Secretary of State or Scottish Ministers – all premises

9.19 The Secretary of State and Scottish Ministers have set out conditions to be attached to all premises licences in the Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007 (opens in new tab) (SI 2007/1409), and the Gambling Act 2005 (Mandatory and Default Conditions) (Scotland) Regulations 2007 (opens in new tab) (SSI 2007/266).

9.20 Conditions under these regulations fall into two categories:

- mandatory conditions made under s.167 of the Act that must be attached to premises licences
- default conditions made under s.168 of the Act, that attach to the premises licence unless the licensing authority decides to exclude them, using its powers under s.169.

9.21 Licensing authorities should note that mandatory conditions made under these regulations are set with the intention that no further regulation in relation to that matter is required. Therefore, it is extremely unlikely that licensing authorities will need to impose individual conditions in relation to matters that are already dealt with by mandatory conditions. Licensing authorities should only consider doing so where there are regulatory concerns of an exceptional nature, and any additional licence conditions must relate to the licensing objectives.

9.22 Mandatory conditions applying to all premises licences are set out at paragraph 9.25 onwards. In addition, there are mandatory conditions that relate to particular category of premises licences. Details of these can be found in Parts 17 to 22 of this guidance.

9.23 Licensing authorities have more flexibility in relation to default conditions and may exclude a default condition and substitute it with one that is either more or less restrictive. Licensing authorities should note, however, that default conditions are intended to reflect normal industry operating practices. In circumstances where default conditions are excluded, the Commission would generally expect them to be replaced by other conditions, given the requirements of s.153. Where the condition is more restrictive, the licensing authority should ensure that they have clear regulatory reasons for doing so.

9.24 Default conditions under the regulations set out above relate to particular categories of premises licence and details can be found in Parts 17 to 22 of this guidance.

A2

Mandatory conditions

9.25 The following mandatory conditions apply to all premises licences:

- the summary of the premises licence issued by the licensing authority must be displayed in a prominent place on the premises. In England and Wales this must include a summary of the terms and conditions of the premises licence.
- 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 in England and Wales. Sale of National Lottery and private lottery tickets are prohibited in Scotland.

9.26 There are also mandatory conditions attaching to each type of premises licence controlling access between premises. There can be no direct access between one premises licensed under the Act and another premises licensed under the Act, with the following exceptions:

- between licensed betting premises
- between bingo premises and alcohol-licensed premises/clubs with a club gaming or club machine permit/family entertainment centres (FECs) and tracks
- between tracks and alcohol-licensed premises/clubs with a club gaming or club machine permit/FECs/betting premises and bingo premises
- between FECs and alcohol-licensed premises/bingo halls/clubs with club gaming or club machine permit and tracks.

Default conditions

9.27 S.169 of the Act gives licensing authorities:

- the ability to exclude from premises licences any default conditions that have been imposed under s.168
- the power to impose conditions on premises licences that they issue.

9.28 Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice and this guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.

9.29 Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.

9.30 Where there are risks associated with a specific premises or class of premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.

9.31 Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:

- relevant to the need to make the proposed building suitable as a gambling facility
- directly related to the premises (including the locality and any identified local risks) and the type of licence applied for
- fairly and reasonably related to the scale and type of premises
- reasonable in all other respects.

Conditions that may not be attached to premises licences by licensing authorities

9.32 The Act sets out certain matters that may not be the subject of conditions:

- s.169(4) prohibits a licensing authority from imposing a condition on a premises licence which makes it impossible to comply with an operating licence condition
- s.172(10) provides that conditions may not relate to gaming machine categories, numbers, or method of operation
- s.170 provides that membership of a club or body cannot be required by attaching a condition to a premises licence (the Act specifically removed the membership requirement for casino and bingo clubs and this provision prevents it being reinstated)
- s.171 prevents a licensing authority imposing conditions in relation to stakes, fees, winnings or prizes.

Part 10: Review of premises licence by licensing authority

Introduction

for casino and/or games of equal chance is operating as such and is not merely a vehicle to offer higher stake and prize gaming machines.

A3

17.60 In exercising its functions under the Act a licensing authority should take account of the relevant code of practice on 'controlling where gaming machines may be played'. It is specifically obliged to do so when exercising functions under section 153 of the Act. In circumstances where a licensing authority considers an existing premises is not compliant with these general requirements they should contact the Commission at the earliest opportunity.

17.61 Both the Commission and licensing authorities have the power to attach specific conditions to operating or premises licences in circumstances where additional assurance is required. The Commission favours the approach of general conditions for all supplemented by operator specific conditions in cases where novel or contentious operating models are used which include the provision of gaming machines. This is to deliver the policy objectives above and ensure the risk to the licensing objectives is minimised.

17.62 In the Commission's view the above approach would ideally be adopted at licensing stage. Licensing authorities should ensure that they request all the information required from an applicant for a new premises or for a variation to an existing premises in order to satisfy themselves as to the matters set out at s153 of the Act. This includes the codes of practice and this guidance. The approach of adding case-specific conditions can equally be deployed in respect of an existing unit where concerns arise or when changes are made to the operating model.

Self-exclusion

17.63 Social Responsibility Code Provision 3.5.6 requires that all non-remote casino (and bingo and betting licences except those at a track) and holders of gaming machine general operating licences for adult gaming centres must offer self-exclusion schemes to customers requesting such a facility. There is also an Ordinary Code provision at 3.5.7. The full details can be found within the LCCP¹³

Part 18: Bingo

Introduction

18.1 Bingo is not given a statutory definition in the Act although two types of bingo are commonly understood:

- cash bingo, where the stakes paid make up the cash prizes that are won
- prize bingo, where various forms of prizes are won, not directly related to the stakes paid.

18.2 The game and rules of bingo have evolved to the point where, despite the absence of any formal industry standard, the way in which bingo is played is broadly similar throughout Great Britain. Bingo is equal chance gaming. The Commission has published its view of what bingo is and how it differs from

other forms of gambling. This can be found in the advice note What constitutes bingo (opens in new tab) (this advice does not form part of the Guidance to licensing authorities). This advice was developed with the support of key stakeholders from the bingo industry.

A3

18.3 Cash bingo is the main type of bingo played in commercial bingo premises. They also offer prize bingo, largely as games played in the intervals between main stage games. This means that only premises with a bingo premises licence, or a large casino premises licence issued under the Act (where the operator holds a bingo as well as a casino operating licence), will be able to offer bingo in all its forms.

18.4 As well as commercial bingo premises, bingo can be found in other gambling premises. Prize bingo is traditionally a game played in arcades, especially seaside amusement arcades, or at travelling funfairs. For these operators, prize bingo is subject to the allowances for prize gaming in the Act. This means that, subject to limits on participation fees and prizes, adult gaming centres, licensed and unlicensed family entertainment centres, and travelling fairs, (or any premises with a prize gaming permit) are able to offer prize gaming, which includes prize bingo. In this form of gaming, the nature of the prize must not be determined by reference to the number of people playing the game, and the nature or the size of the prize must not be determined by reference to the amount paid for or raised by the gaming. See Part 27 of this guidance for a fuller discussion of prize gaming.

18.5 Licensing authorities need to satisfy themselves that bingo can be played in any bingo premises for which they issue a premises licence. An operator may choose to vary their licence to exclude a previously licensed area of that premises, and then apply for a new premises licence, or multiple new premises licences, with the aim of creating separate premises in that area. Essentially providing multiple licensed premises within a single building or site. Before issuing additional bingo premises licences, licensing authorities need to consider whether bingo can be played at each of those new premises.

Protection of children and young persons

18.6 Under the Act, children and young persons (anyone up to the age of 18) cannot be employed in providing any facilities for gambling on bingo premises, and children (under 16) cannot be employed, in any capacity, at a time when facilities for playing bingo are being offered. However, young persons, aged 16 and 17, may be employed in bingo premises (while bingo is being played), provided the activities on which they are employed are not connected with the gaming or gaming machines. Licensing authorities are able to find information about the restrictions that apply in Licence conditions and codes of practice (LCCP).

18.7 Children and young people are allowed into bingo premises; however they are not permitted to participate in the bingo and if category B or C machines are made available for use these must be separated from areas where children and young people are allowed. Social Responsibility (SR) code 3.2.5 (3) states that 'licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises' in order to prevent underage gambling.

Gaming machines

18.8 S.172(7), as amended, provides that the holder of a bingo premises licence may make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines on the premises. For example, a premises with a total of 25 gaming machines available for use can make five or fewer category B3 gaming machines available on that premises. Premises that were licensed before

13 July 2011 are entitled to make available eight category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. There are no restrictions on the number of category C or D machines that can be made available. Regulations state that category B machines at bingo premises are restricted to sub-category B3 (SI 2007/2158: Categories of Gaming Machine Regulations 2007 (opens in new tab)) (but not B3A) and B4 machines. Licensing authorities should ensure that gambling machines are made available for use in a manner consistent with our guidance within Part 16. For the purpose of calculating the category B machine entitlement in gambling premises, gaming machines should only be counted if they can be played simultaneously by different players without physical hindrance. This includes tablets.

A3

18.9 The gaming machines must remain within the licensed area covered by the premises licence. In the unusual circumstance that an existing bingo premises covered by one premises licence applies to vary the licence and acquire additional bingo premises licences (so that the area that was the subject of a single licence will become divided between a number of separate licensed premises) it is not permissible for all of the gaming machines to which each of the licences brings an entitlement to be grouped together within one of the licensed premises.

18.10 Equipment operated by a bingo operating licence for the purpose of playing bingo, for example what are currently known as mechanised cash bingo, electronic bingo terminal (EBTs) and video bingo terminals (VBTs), will be exempt from controls on gaming machines provided they comply with any conditions set by the Commission and, in the case of EBTs, do not hold gaming machine content.

18.11 An EBT that offers gaming machine content in addition to bingo content is considered to be a gaming machine and would count towards the total number of gaming machines or towards the offering of bingo. Any EBTs that do not offer gaming machine content would not count towards the number of gaming machines.

Self-exclusion

18.12 Social Responsibility Code Provision 3.5.6 requires that all non-remote casino (and bingo and betting licences except those at a track) and holders of gaming machine general operating licences for adult gaming centres must offer self-exclusion schemes to customers requesting such a facility. There is also an Ordinary Code provision at 3.5.7. The full details can be found within the LCCP¹⁴

Bingo in clubs and alcohol-licensed premises

18.13 Bingo is a class of equal chance gaming permitted on alcohol-licensed premises, and in clubs and miners' welfare institutes, under the allowances for exempt gaming in Part 12 of the Act. There are regulations setting controls on this form of gaming, to ensure that it remains a low stakes and prizes activity (SI 2007/1940: The Gambling Act 2005 (Exempt Gaming in Alcohol-Licensed Premises) Regulations 2007 (opens in new tab) and SI No. 1944; The Gambling Act 2005 (Exempt Gaming in Clubs) Regulations 2007 (opens in new tab)).

18.14 In addition, rules are laid down in the Act about the playing of bingo specifically in alcohol-licensed premises, clubs and miners' welfare institutes¹⁵. Where the level of bingo played in these premises reaches a certain threshold, it will no longer be authorised by these rules and a bingo operating licence will have to be obtained from the Commission for future bingo games. Even in this circumstance, bingo can

still only be offered under the rules for exempt gaming. The aim of these provisions is to prevent bingo becoming a predominant commercial activity on such non-gambling premises.

A3

18.15 The threshold is reached if the bingo played during any seven-day period exceeds £2,000 (either in money taken or prizes awarded) once in a year, referred to as 'high turnover bingo'. There is a legal duty on the licensee or club to inform the Commission if they offer high turnover bingo in any seven day period. This allows the Commission to monitor the bingo activity on the premises, and discuss with the relevant licensee or club the point at which a bingo operating licence may be needed. A 'high turnover period' begins with the first day of the seven day period in which the threshold was exceeded and lasts for a year. If a second period of high turnover bingo occurs within that year, a bingo operating licence will be required. Where bingo is played in a members club under a bingo operating licence no premises licence will be required.

18.16 If it comes to the attention of licensing authorities that alcohol-licensed premises or clubs or institutes are playing bingo during the course of a week which involves significant stakes and prizes, that makes it possible that the £2,000 in seven days is being exceeded, authorities should inform the Commission. To help clubs and institutes to comply with the full range of statutory requirements for gaming, the Commission has developed a statutory code of practice The Code of Practice for gaming in clubs and premises with an alcohol licence (opens in new tab).

18.17 The eight large casinos will be able to offer bingo. Bingo will be permitted as part of their casino premises licence and they will not require a separate bingo premises licence, though they will need to obtain a bingo operating licence (which may be combined with their casino licence) in order to offer facilities for bingo at a casino. The standards in this respect will be no lower than for operators seeking only to provide facilities for bingo alone.

Bingo premises licence conditions

18.18 Part 9 of this guidance discusses the mandatory and default conditions that attach to premises licences.

Mandatory conditions

18.19 A notice stating that no person under the age of 18 years is permitted to play bingo on the premises shall be displayed in a prominent place at every entrance to the premises.

18.20 No customer shall be able to enter bingo premises directly from a casino, an adult gaming centre or betting premises (other than a track).

18.21 Over 18 areas, within bingo halls that admit under-18s, must be separated by a barrier with prominently displayed notices stating that under-18s are not allowed in that area and with adequate supervision in place to ensure that children and young people are not able to access these areas or the category B or C machines. Supervision may be done either by placing the terminals within the line of sight of an official of the operator or via monitored CCTV.

18.22 Any admission charges, the charges for playing bingo games and the rules of bingo must be displayed in a prominent position on the premises. Rules can be displayed on a sign, by making available leaflets or other written material containing the rules, or running an audio-visual guide to the rules prior to any bingo game being commenced.

A3

18.23 Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling in order to do so.

Default conditions

18.24 Bingo facilities in bingo premises may not be offered between the hours of midnight and 9am. However, there are no restrictions on access to gaming machines in bingo premises.

Controlling where gaming machines may be played – bingo

18.25 The following policy objectives summarise the key elements that underpin the approach to controlling where gaming machines may be played:

- with very few low risk exceptions, non-remote gambling should be confined to dedicated gambling premises
- the distinctions between different types of licensed gambling premises are maintained
- gambling activities are supervised appropriately
- within casino, bingo and betting premises, gaming machines are only made available in combination with the named non-remote activity of the operating licence.

18.26 The Act and associated regulations set out a comprehensive regulatory framework for controlling gaming machines. By linking different machine entitlements to different types of premises, the framework seeks to ensure the number and power (in terms of stakes, prizes and speed of play) of machines is proportionate to the premises. For such a framework to have any meaningful effect it must be possible for regulatory authorities and consumers to distinguish between different gambling premises.

18.27 The LCCP requires (Social Responsibility Code Provision 9) that gaming machines are only made available in combination with the named non-remote activity of the operating licence. So, unless a bingo premises operator offers substantive facilities for non-remote bingo it should not make gaming machines available for use on the premises in question. To contain the unavoidable risk to the licensing objectives associated with gaming machines, premises which offer machines must be appropriately supervised.

A3

18.28 The current regulatory framework prescribes that category B gaming machines may only be made available in licensed gambling premises and not in locations which may prompt more ambient gambling such as pubs. Maintaining distinctions between different gambling venues allows individuals to make a deliberate choice whether to enter that particular gambling environment. In carrying out their functions under the Act licensing authorities should satisfy themselves that a premises applying for or licensed for bingo is operating or will operate in a manner which a customer would reasonably be expected to recognise as a premises licensed for the purposes of providing facilities for bingo.

18.29 Licensing authorities are not being asked to impose a 'one size fits all' view of how a bingo premises should look and function. Rather they are ensuring that a premises licensed for the purposes of providing facilities for bingo is operating as such and is not merely a vehicle to offer higher stake and prize gaming machines.

18.30 In exercising its functions under the Act a licensing authority should take account of the relevant code of practice on 'controlling where gaming machines may be played'. It is specifically obliged to do so when exercising functions under section 153 of the Act. In circumstances where a licensing authority considers an existing premises is not compliant with these general requirements they should contact the Commission at the earliest opportunity.

18.31 Both the Commission and licensing authorities have the power to attach specific conditions to operating or premises licences in circumstances where additional assurance is required. The Commission favours the approach of general conditions for all supplemented by operator-specific conditions in cases where novel or contentious operating models are used which include the provision of gaming machines. This is to deliver the policy objectives above and ensure the risk to the licensing objectives is minimised.

18.32 In the Commission's view the above approach would ideally be adopted at licensing stage. Licensing authorities should ensure that they request all the information required from an applicant for a new premises or for a variation to an existing premises in order to satisfy themselves as to the matters set out at s153 of the Act. This includes the codes of practice and this guidance. The approach of adding case specific conditions can equally be deployed in respect of an existing unit where concerns arise or when changes are made to the operating model.

Part 19: Betting premises

Introduction

19.1 The Act contains a single class of licence for betting premises although within this, there are different types of premises which require licensing. This part of the guidance discusses off-course betting which is betting that takes place other than at a track in what was previously known as a licensed betting office. Tracks are discussed in Part 20 of this guidance. Please note that there are also betting offices on tracks, that have a separate premises licence from the track licence, which are also discussed in Part 20.

19.2 The Act also permits betting intermediaries to operate from premises. S.13 of the Act defines a betting intermediary as a person who provides a service designed to facilitate the making or acceptance of

**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: **Merkur Slots UK Limited**

[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:

Seebeck House

1A Seebeck Place

Knowlhill

Milton Keynes

Postcode: **MK5 8FR**

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

003266-N-103444

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): **Merkur Slots**

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

1432-1434 London Road

Norbury

London

Postcode: **SW16 4BZ**

12. Telephone number at premises (if known):

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 premises

14(a) Are the premises situated in more than one licensing authority area?

No *[delete as appropriate]*

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** *[delete as appropriate]* *[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. **N/A**

	<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): *(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** *[delete as appropriate]*

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 *[delete as appropriate]*

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

12 High Street, Croydon	CR0 1YA	BINGO	13/00074/GAMBIN
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20. Please set out any other matters which you consider to be relevant to your application:

The Applicant operates a national estate of licensed bingo premises which include the provision of bingo tablets and Bingo Plus and Bingo Express terminals. Substantive facilities for non-remote bingo will be made available in accordance with legislative provisions.

The operator has full authority to provide licensed bingo by the provision of an Operating Licence granted by the Gambling Commission. The UK's Gambling Regulator has therefore approved the measures implemented to ensure that effective anti-money laundering procedures are implemented and policies have been developed to ensure responsible trading in accordance with the gambling legislation, the licensing objectives and the licence conditions and code of practice.

A copy of Merkur Slots UK Limited's Operational Standards has been provided in support of the application and full copies of the Applicant's policies and procedures are available, if required.

A copy of Merkur Slots UK Limited's 'Working Together' document has also been supplied in support of the application, which provides an overview of the licensee's proposed operation.

Merkur Slots UK Limited applies extensive policies and procedures to promote the Licensing Objectives and the Applicant considers that the following licence conditions are appropriate to the proposed operation:

1. Premises shall operate the following closing time:
 - a. 01:00 the following morning Sunday to Thursday; and
 - b. 02:00 the following morning on Friday and Saturday.
2. The premises shall install and maintain a comprehensive CCTV system, which shall continually record whilst the premises are open. All recordings shall be stored for a minimum period of 31 days. Viewing of recordings shall be made available upon the request of Police or an authorised officer of the Licensing Authority, subject to data protection legislative requirements.
3. Notices shall be prominently displayed within the premises stating that CCTV is in operation.
4. An incident log shall be kept at the premises and made available on request to an authorised officer of the Licensing Authority or the Police. Details to include:
 - a. all crimes reported to the venue
 - b. all ejections of patrons
 - c. any complaints received concerning crime and disorder
 - d. any incidents of disorder
 - e. all seizures of drugs or offensive weapons
 - f. any visit by a relevant authority or emergency service.
 - g. any attempts by children and young persons to gain access to the premises to gamble
 - h. any Challenge 25 Refusals.
5. A think 25 proof of age scheme shall be operated at the premises where any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry. Acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
6. Signage advertising the aforementioned proof of age scheme shall be prominently displayed throughout the premises.
7. Individuals who are deemed to be under the influence of alcohol or drugs shall not be

allowed to enter the premises.

8. The appropriate staffing levels will be assessed by way of risk assessment and cognisance will be taken of any police advice

Part 6 – Declarations and Checklist (Please tick)

We confirm that, to the best of 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:

Name: Poppleston Allen

Date: 10/03/2022

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.]

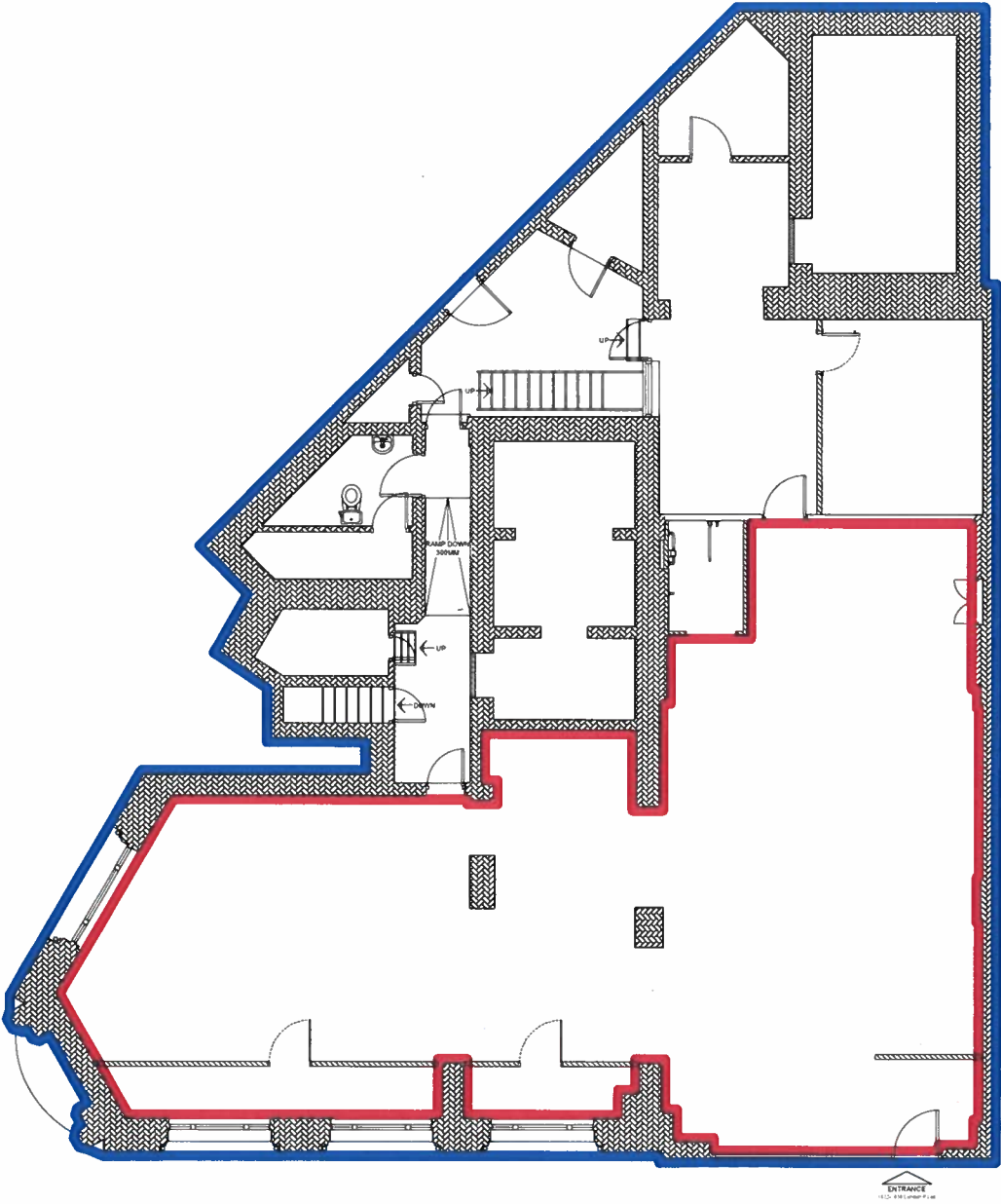
Part 8 – Contact Details

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

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

24. Postal address for correspondence associated with this application:

PROPOSED GAMING AREA: 148.9m²



ENTRANCE
1432-1434 LONDON ROAD

LICENSE PLAN LEGEND	
LINE TYPE	LINE TYPE DESCRIPTION
—	AREA IN WHICH FACILITIES WILL BE PROVIDED FOR GAMING
—	EXTENT OF PREMISES
GAMBLING ACT 2005 LICENSING PLAN Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for illustrative purposes only, and does not form part of the premises licence.	

REVISIONS
REV 00:

FIT OUT TYPE CONCEPT 2	
PROJECT	MERKUR SLOTS 1432-1434 LONDON ROAD NORBURY LONDON SW16 4BZ
DESCRIPTION	PROPOSED LICENCE PLAN

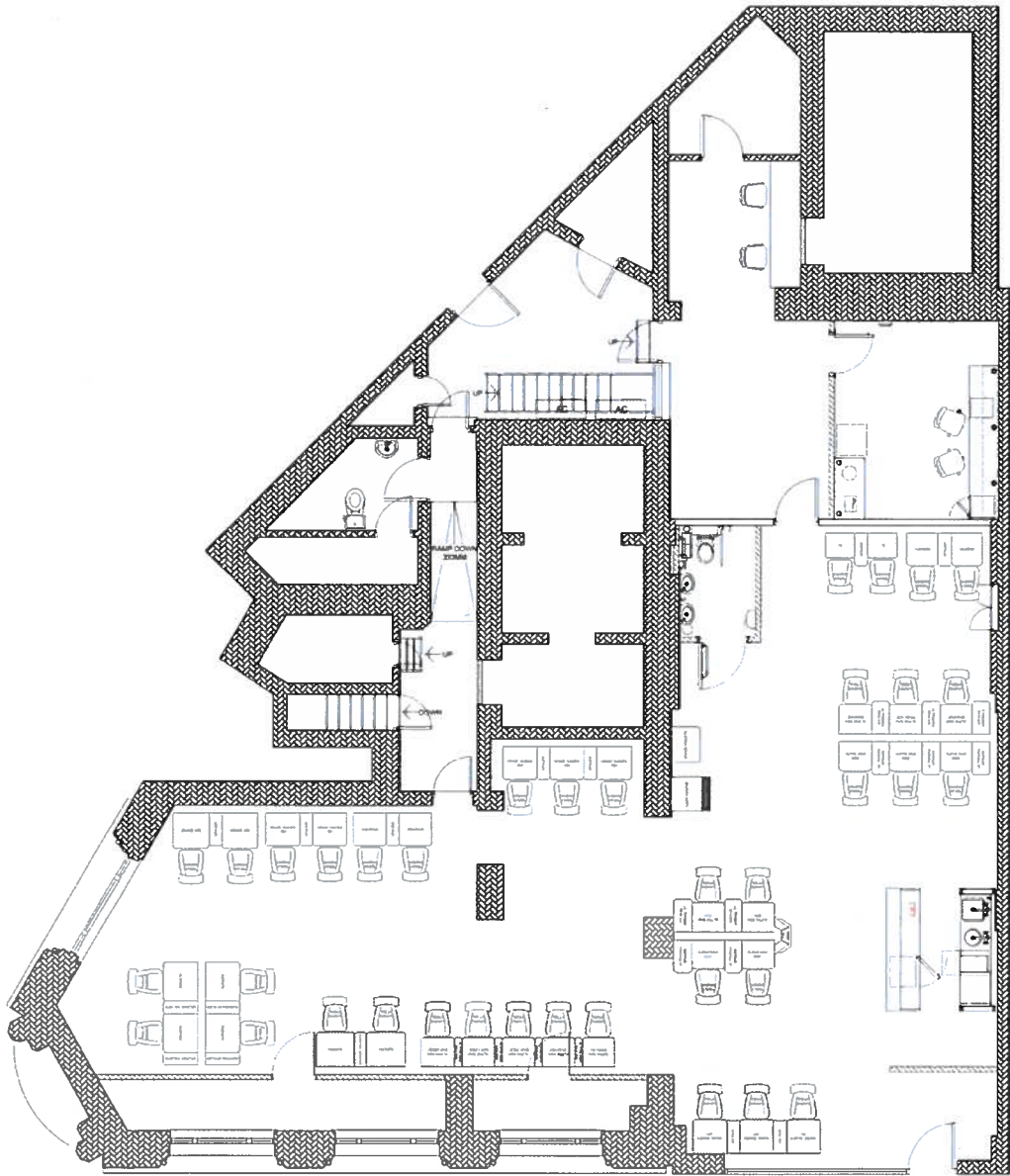
REFERENCE DRAWINGS	
SCALE	1:50
DRAWN BY	MG
DATE	09/02/22
DRAWING NO.	999-PL-15
REVISION	02



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PROPOSED GAMING AREA: 148.9m²



REVISIONS
REV 00:

FIT OUT TYPE
CONCEPT 2
PROJECT
Merkur Slots
1432-1434 London Road
Norbury
London
SW16 4BZ
DESCRIPTION
PROPOSED MACHINE PLAN

REFERENCE DRAWINGS

SCALE
1:100
DRAWN BY
MG/LC
DATE
15/02/22

DRAWING No
999-PL-14
REVISION
02



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THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

- 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

Objective 1 - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

- Merkur Slots UK Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Merkur Slots UK Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Merkur Slots UK Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- 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 Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Merkur Slots UK Limited premises operate digital CCTV and customer areas are supervised.
- Merkur Slots operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- All Merkur Slots premises provide a static alarm system which is also supported by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Merkur Slots UK Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Merkur Slots employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Merkur Slots operate a robust late night working policy, which is fully supported by a full-time Night Manager.

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- Merkur Slots does not operate a single-manning policy between 8pm and close, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

Objective 2 - Ensuring that gambling is conducted in a fair and open way.

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.
- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our appointed Alternate Dispute Resolution provider (IBAS).
- All venue managers attend our National Training Centre for a thorough induction programme prior to taking on responsibility of their own venue and team.
- All licensed premises employees receive induction and six-monthly refresher training during the course of their employment to ensure that potential issues can be addressed at the earliest opportunity.

Objective 3 - Protecting children and other vulnerable persons from being harmed or exploited by gambling

- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer is under age. All challenges are recorded on our Smart Tablet system under Age Verification Checks and Check Policy are our third-party independent partner for compliance testing.
- All licensed premise employees receive induction and six-monthly refresher training during the course of their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.
- We prominently display information throughout our licensed premises on responsible gambling and provide details of organisations that can provide support and guidance such as BeGambleAware.
- Playright is installed in all licensed premises - this is a self-help App available to customers to enable them to manage spend and play time.
- Socially Responsible messaging is implemented on B3 and Category C digital machines.
- All licensed premise employees are trained to identify potential at risk customers and conduct effective interactions. Customer interactions are recorded on the Interactions module on the electronic Smart Tablet and reviewed centrally by the Compliance team.
- We implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.

- The layout of our premises is designed to facilitate customer supervision by employees.
- We provide an annual donation in support of research, education and treatment of problem gambling.

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All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.

Merkur Slots, 1432-1434 London Road, Norbury, SW16 4BZ

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	1432-1434 London Road, Norbury, SW16 4BZ
Local Authority:	Croydon Council
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-025 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Merkur Slots UK Limited
Name and Title of Assessor:	Internal Compliance Auditors
Date of Assessment:	10/02/2022
Review Date:	On opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots, a former Barclays Bank is located on a busy road, surrounded by mix of retail and non-retail outlets that are mainly occupied. London Road A23 is main route that leads to central London. This road can become highly congested during the week. Restricted parking rules surrounding the area as the side streets are mainly occupied by residents. Excellent connection between Croydon and Streatham, Brixton and City of London. Norbury train station is 2 min walking distance. Southern train service runs towards Lodon Bridge and London Victoria and also South way such as Croydon South, Epsom, Caterham and many more destinations. Large number of Take-away shops, restaurants and food stores are placed along the London Road. Barber shops, hairdressers and nail beauticians are also present.
Establishments of note:	There are two Merkur Slots that operates in the area located at 12 High Street, Croydon, CR0 1YA which is in Croydon Council and 110 Streatham Hill, London, SW2 4RD Lambeth Council.
Adjoining premises:	Merkur Slots is located on the corner of London Road and one way street "Norbury Crescent". On one side of the building is Bambe Fashion- children's wear and accessories and on the side of Norbury Crescent is Milly's Barbers/ Rose Unisex Salon and Money Transfer facility.
Crime statistics:	In the year ending June 2021, the crime rate in Croydon was about the same as the average crime rate across similar areas at 84.12 per 1000, it was lower than in other Metropolitan police force areas. (police.uk). In December 2021 there were 109 crimes recorded within a half mile of London Road, Norbury: Violence and Sexual offences – 23, Anti-social behaviour – 20 and Vehicle crime – 16. (streetcheck.uk)
Population:	London Road, Norbury area has a population of 16,650 residents, gender split is 50/50 male/female. 12% are aged 16yrs and under, 63% are of working age and 25% are over 65yrs (median age is 33yrs). Majority of local residents are single 55%. 83% of people in Rushey Green area claim to have good and very good health, which is above UK average. Education levels – 10.8% of workers in SE6 4AA are in elementary occupations, compared to a national average of 11.6. (2011 Census Table)
Culture:	Merkur Slots Norbury area is ethnically very diverse. Only 33% of resident population identify themselves as White. There is a high concentration of residents who describe themselves as Black African or Caribbean (26.5%). Other sizeable ethnic groups include Pakistani (14%) and Indian (9.4%). Dominating religion here is Christianity – 44.3% of resident population, followed by Muslim (24%). A sizeable portion of the population (16.5%) claim to have no religion, 5.3% did not state their religious views and 4.9% is Hindu. (streetcheck.uk)
Unemployment:	Current unemployment rate in Norbury area at 8.4% which is higher than 3.9% national average. 54.4% of resident population is in work, 5.6% is retired and 17% are students, which is higher than UK average of 9.2%. Main source of employment here are elementary occupations, mainly Retail (15.5%), Education (11.3%) and Health including social work (10.5%). Employees predominantly work in supervisory, clerical, and junior managerial, administrative and professional roles. There is also high volume of skilled, semi-skilled, unskilled manual workers and lowest grade workers. (streetcheck.uk)
Deprivation:	In Index of Multiple Deprivation 2019, Norbury area has been ranked amongst 40% most deprived neighbourhoods in the country, the same as in 2015. Indices of deprivation causing biggest concern is crime deprivation, classified within 10% most deprived areas in the country. Both, barriers to housing and other services domain and living environment deprivation domain were classified within 20% most deprived areas in the country. Health deprivation domain is Norbury area is better than 55% areas of the country, Education domain is better than 52% of areas in England and Employment domain is better than in 50% of areas in UK. 44% household spaces are socially rented properties which is higher than the London average of 24.1%.
Local Police:	London Road, Croydon, London, SW16 4BZ is within the Norbury and Pollard's Hill policing neighbourhood, under the Metropolitan Police Service force area. Closest police station is Tooting Police Station, 251 Mitcham Rd, London SW17 9JQ (2.3 miles from the venue).

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The Gambling Act 2005 sets out the three licensing objectives (LO), which 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 people from being harmed or exploited by gambling.

Localised Risks to the Licensing Objectives

This Local Area Risk assessment takes into consideration Croydon Council local authority Statement of Gambling Principles, reference Part B, section 5 Bingo Centres and Croydon Council Borough Profile 2011.

Environmental Factors

In preparing this assessment Merkur Slots has considered the relevance of environmental factors. In this context, environmental factors include the physical location of schools, playgrounds, residential areas, other retail premises and locations (bus stations, tube stations) which influence footfall. We have set out below our position on risk in this area:

Licensing Objectives	Local Risks	Control Measures
Protecting children and other vulnerable people from being harmed or exploited by gambling	<p>Unemployment Current unemployment rate in Norbury area at 8.4% which is higher than 3.9% national average. 54.4% of resident population is in work, 5.6% is retired and 17% are students, which is higher than UK average of 9.2%. Main source of employment here are elementary occupations, mainly Retail (15.5%), Education (11.3%) and Health including social work (10.5%). Employees predominantly work in supervisory, clerical, and junior managerial, administrative and professional roles. There is also high volume of skilled, semi-skilled, unskilled manual workers and lowest grade workers. (streetcheck.uk)</p> <p>Deprivation In Index of Multiple Deprivation 2019, Norbury area has been ranked amongst 40% most deprived neighbourhoods in the country, the same as in 2015. Indices of deprivation causing biggest concern is crime deprivation, classified within 10% most deprived areas in the country. Both, barriers to housing and other services domain and living environment deprivation domain were classified within 20% most deprived areas in the country. Health deprivation domain is Norbury area is better than 55% areas of the country. Education domain is better than 52% of areas in England and Employment domain is better than in 50% of areas in UK. 44% household spaces are socially rented properties which is higher than the London average of 24.1%.</p> <p>Schools and Education Norbury Manor Primary School, Abingdon Rd, SW16 5QR Woodmansterne School, 110 Woodmansterne Rd, SW16 5UQ Granton Primary School, Granton Rd, SW16 5AN St Andrew's Catholic Primary School, Polworth Rd, SW16 2ET</p>	<p>Age Verification <i>Ensuring Under 18's do not have access to licensed premises</i> All Merkur Slots venues are strictly adult only (over 18's only). Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy. Age verification is embedded in training platforms and responsible gambling policies. Over 18's notices are displayed on the entrance. Think 25 advertising is prominently displayed throughout the premise. Merkur Slots Norbury Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP). Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them. Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is</p>

<p>Norbury High School for Girls, Kensington Ave, CR7 8BT Paxton Academy Sports & Science, 843 London Rd, CR7 6AW Harris Academy Merton, Wide Way, CR4 1BP</p> <p>Community Centres and Youth Centres Harlow Hall, 14 Stanford Rd, Norbury, SW16 4PY Cassandra Learning Centre, 1433A London Rd, SW16 4AQ Bismillah Cultural Centre, 1370 London Rd, SW16 4DE Norwood Grove Social Centre, 5 Copgate Path, SW16 3EA St Oswald's Parish Hall, St. Oswalds Rd, SW16 3SB Highbury Community Project, 2 Highbury Ave, CR7 8BP 67th Croydon Scout Group, Endeavour Halls, 273 Norbury Cres, SW16 4LF</p> <p>Parks, play grounds and sports/leisure facilities Norbury Park, 217 Green Ln, SW16 3LY Thornton Heath Recreation Ground, Winterbourne Rd, CR7 7RX</p> <p>Vulnerable and addiction support services</p> <p>Homeless shelters and food banks Albany Housing Trust, 1127-1129 London Rd; SW16 4XD Liberty Food Bank, 1A Norbury Cres, SW16 4JS Freeman Court Sheltered Housing Unit, 94 Stanford Rd, SW16 4QR</p> <p>Pawnbrokers and Loan Shops Cash Exchange, 1387 London Rd, SW16 4AN</p> <p>Medical Centres, Care Homes and Mental Health facilities Norbury Health Centre, 28 Pollards Hill N, Norbury, SW16 4NL Leander Road Health Centre, 939 London Rd, CR7 6JE The Rowans Surgery, 1 Windermere Rd, SW16 5HF Fairview Medical Centre, 69 Fairview Rd, SW16 5PX Streatham Common Practice, 51 Guildersfield Rd, SW16 5LS The Vale Surgery, Streatham Vale, SW16 5SE Lambeth Community mental health assesement and liason team base, 380 Streatham High Rd, SW16 6HP Christ The King Residential Care Homes, 550 Streatham High Rd, SW16 3QF Trinity Care Services Ltd, 1445 London Rd, SW16 4AQ Roselands Care Home, 10 Stanford Rd, SW16 4PY Elitandia Hall Care Home, Middle Way, SW16 4HN St Antony's Care Home, Mitcham, 1 Wide Way, CR4 1BP Care Expertise, 1070 London Rd, CR7 7ND Norbury Hall Care Home, 55 Craignish Ave, SW16 4RW Eaze Care Supported Living Norbury, 11 Craignish Ave, SW16 4RN Norcrest 2000 Home Ltd, 30 Norbury Cres, SW16 4LA Adelaide Care Ltd, 92 Kensington Ave, CR7 8BZ Joy Care Home Services Ltd, 86 Braxted Park, SW16 3AU Greenvale Specialist Care Unit, Voss Ct, SW16 3BS Rosemanor 1 Residential Care Homes, 46 Kempshott Rd,</p>	<p>20% higher than the industry average, all venues receive 3 or 4 random test visits per year.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>The children and young persons gambling participation survey shows that the number of 11-16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated.</p> <p>We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 'marginal gamblers induced to participation by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified' https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</p> <p>Vulnerability Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p>
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	<p>SW16 5LQ CTK Care Home, 68 Tankerville Rd, SW16 5LP Christ the King Nursing Home, 68 Tankerville Rd, SW16 5LP</p> <p>Gambling premises William Hill, 1384, 1386 London Rd, SW16 4AN Betfred, 1394 London Rd, SW16 4BZ Ladbrokes, 1501 London Rd, SW16 4AE Paddy Power, 1421 London Rd, SW16 4AH</p> <p>Public Houses and Alcohol Licensed Premise The Moon Under Water, 1327 London Rd, SW16 4AU The Vale at Streatham, 1A Lilian Rd, SW16 5HN The Railway, 2 Greyhound Ln, SW16 5SD The Bull Streatham, 498 Streatham High Rd, SW16 3QB The Rabbit Hole, 151-153 Greyhound Ln, SW16 5NJ The Mere Scribbler, 426 Streatham High Rd, SW16 3PX</p> <p>Residential Areas Residential buildings are primarily terraced (including end-terrace). Domestic properties are primarily flats. Domestic properties are mostly privately rented, with some owner occupied.</p> <p>Bus stops and other Transport links Norbury railway station, Norbury, London SW16 4JP Norbury Station (Stop B), Norbury, London SW16 4BU St Helen's Road (Stop D), Norbury, London SW16 4BZ Norbury Crescent / London Road (Stop C), Norbury, London SW16 4JU</p> <p>Locally Identified Premises Regular Festivals and Town Events/Mass Gatherings <u>Norbury Canal Festival</u> is an annual event at Norbury Junction on the 'Shroppe'. Run by the Shrewsbury & Newport Canal Trust, Norbury Wharf Ltd and The Junction Inn, Norbury Junction. <u>City Splash Festival 2022</u> will take place on the Sunday the 29th of May in the beautiful Brockwell Park.</p>	<p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Customer Interaction Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as the Playright App or Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Player Protection <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i> <i>Failure to provide information to customers on responsible gambling</i> <i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p> <p>Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.</p> <p>'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are in prominent locations within the premise and in private areas, such as customer toilets.</p> <p>Playright App available for customers to self-manage their play and spend and can send alerts to Merkur Slots Norbury if the customer enters at a time, they have chosen not to play which instigates an interaction with the customer.</p> <p>Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling</p>
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<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being</p>	<p>Crime statistics Merkur Slots Norbury is situated within the Norbury and Pollard's Hill policing neighbourhood within the Metropolitan Police Constabulary. 1187 incidents of crime reported between Jan to Dec 2021 - anti-social behaviour and violence and sexual offences both accounted for 19.4% of reported incidents. During</p>	<p>Premise Security and violence in the workplace <i>Poor security control measures which may increase vulnerability to crime</i> <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p>

used to support crime	<p>December 2021, 109 crimes were recorded within ½ mile of the location, violence and sexual offences – 23 (21.1%), anti-social behaviour – 20 (18.3%), vehicle crime – 17 (15.6%), burglary and public order – 10 (9.2% each), other theft – 9 (8.3%), criminal damage and arson – 7 (6.4%), robbery – 6 (5.5%) and other crimes – 8 (7.3%).</p> <p>Local Police London Road, Croydon, London, SW16 4BZ is within the Norbury and Pollard's Hill policing neighbourhood, under the Metropolitan Police Service force area. Closest police station is Tooting Police Station, 251 Mitcham Rd, London SW17 9JQ (2.3 miles from the venue).</p> <p>Public Houses and Alcohol Licensed Premise The Moon Under Water, 1327 London Rd, SW16 4AU The Vale at Streatham, 1A Lilian Rd, SW16 5HN The Railway, 2 Greyhound Ln, SW16 5SD The Bull Streatham, 498 Streatham High Rd, SW16 3QB The Rabbit Hole, 151-153 Greyhound Ln, SW16 5NJ The Mere Scribbler, 426 Streatham High Rd, SW16 3PX</p> <p>Pawnbrokers and Loan Shops Cash Exchange, 1387 London Rd, SW16 4AN</p> <p>Gambling premises William Hill, 1384, 1386 London Rd, SW16 4AN Betfred, 1394 London Rd, SW16 4BZ Ladbrokes, 1501 London Rd, SW16 4AE Paddy Power, 1421 London Rd, SW16 4AH</p> <p>Residential Areas (Impacted by Anti Social Behaviour) Residential buildings are primarily terraced (including end-terrace). Domestic properties are primarily flats. Domestic properties are mostly privately rented, with some owner occupied. In December 2021, 20 anti-social behaviour crime incidents were reported within half a mile from Merkur Slots Norbury postcode. The highest-concentration of those incidents was around Delmeny Avenue and London Road.</p>	<p>Merkur Slots Norbury is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed.</p> <p>Merkur Slots Norbury will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p>General Crime and Disorder <i>To identify aggressive customers to prevent crime and disorder</i> <i>Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police UK hot-spot mapping for the local policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with local Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert-system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).</p> <p>Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.</p> <p>Merkur Slots Norbury will participate with any local/town centre-scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.</p>
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Anti-social behaviour outside the premise

Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.

Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.

Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.

Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.

Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.

Money Laundering

Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.

Merkur Slots has a designated Anti Money Laundering Officer (AMLO) and AML policies with clear escalation and reporting processes.

There are pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.

IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.

Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.

Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.

Adequate staff will always be maintained and subject to regular review and risk assessment.

	<p>Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member. Such times when Merkur Slots choose to operate with a single man is strictly controlled and are never planned to happen from 8pm until 6am.</p> <p>In considering when it is appropriate for a venue to operate with one member of staff Merkur Slots will primarily consider the security of the employees by reviewing customer levels, cash control needs and the activity within the local area such as licensed premises closing times.</p> <p>Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.</p> <p>Merkur Slots Norbury will operate TITO machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built-in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.</p> <p>As such staff are based predominately on the venue floor and have very little need to work in a back area, any back office work is planned when the venue is closed (cash collections) or where customer numbers are low and sufficient staff available.</p> <p>Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TITO and GeWeTe management of cash within the venue.</p> <p>The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.</p> <p>Venue and machine keys are secured in a time delay safe accessible only by Duty Management.</p> <p>The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed.</p> <p>Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.</p> <p>Alcohol and Drugs Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise. 'No Alcohol Allowed' signage on the door.</p>
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		<p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p> <p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p>Money Lending Money lending is not tolerated within our premises.</p> <p>Suspensions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p>
<p>Ensuring that gambling is conducted in a fair and open way</p>		<p>Bingo/Gaming Machine and Supervision The premise will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p>Customer Complaints <i>Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p> <p>Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p> <p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaints portal used to collate and manage responses.</p>

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		<p>4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p> <p>Marketing Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, Bingo Played Here, opening times and promotional activity.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p>
Other	<p>Places of worship and Religious Buildings Liberty Christian Ministries, 1A Norbury Cres, SW16 4JS St Bartholomew's Catholic Church, Norbury, 159 Ellison Rd, SW16 5DE Power of the Living Word Ministries International, Premier House, 325 Streatham High Rd, SW16 3NT Immanuel and St Andrew's Church, 452 Streatham High Rd, SW16 3PY Church of the Holy Redeemer, Parish Hall, Churchmore Rd, SW16 5UZ Hope Ministries London, 6-7 Turlle Rd, SW16 5QN Church of Saint Olave, Mitcham, Church Walk, SW16 5JH St Philip's Church, Norbury, Beech Rd, SW16 4NW Parish Church of St Stephen, Norbury & Thornton Heath, 9 Warwick Rd, CR7 7NH Norbury Methodist Church, 2a Pollards Hill N, SW16 4NL Grace Assembly, 273 Norbury Cres, SW16 4LF El-Bethel Ministries Glory House, 1268 London Rd, Norbury, SW16 4ER St Oswald's Parish Church, St. Oswalds Rd, SW16 3SB</p>	<p>Ethnicity and Local Area Demographic Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p>Training & Social Responsibility Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p>

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		<p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Managers review compliance logs monthly, Area Managers Bi-monthly and Compliance Auditors twice yearly.</p> <p>COVID 19 All staff receive training on COVID-19 guidelines.</p> <p>Control measures clearly displayed at the entrance, temperature checks prior to entry and hand sanitisers available on entrance and throughout premise.</p> <p>Masks made available to customers.</p> <p>Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced.</p> <p>COVID-19 Daily Check, B3 Ratio Check and Customer Track and Trace will be recorded on the IHL SMART Tablet.</p>
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Merkur Slots Norbury Premise Layout

Premise level:	Merkur Slots Norbury occupies ground floor and basement of the building.
Premise frontage:	Merkur Slots Norbury will be a property which obscures the interior with digital Marketing Screens displaying safer gambling messages, no under 18's, opening times. Marketing and promotions will comply with LCCP and standards set by the Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP).
Counter Position:	<p>Merkur Slots Norbury floor layout will be of the design to avoid blind spots and enable supervision of entrances and machines from the central service area and staff will regularly patrol the gaming floor to supervise and interact with customers and identify underage or vulnerable persons.</p> <p>The central service area serves as the main support area for staff to manage the venue without having to leave the floor:</p> <ul style="list-style-type: none"> - TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines. - Beverage and snacks are provided from the service area - IHL SMART Tablet located on the service desk provides the facility to record age verification checks, customer interactions, incidents, self-exclusions, reinstatements, track and trace and general venue management checklists - The CCTV monitor on the central desk allows staff to view the exterior at all times.
Floor layout:	Merkur Slots Norbury floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilet can be observed and staff will regularly patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and Leaflets will be located in prominent locations within the premise.
Machine Positions:	<p>Merkur Slots Norbury will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur bingo venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one.</p>
Hidden Areas:	Merkur Slots Norbury will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by employees when working in the service area.

Additional Comments

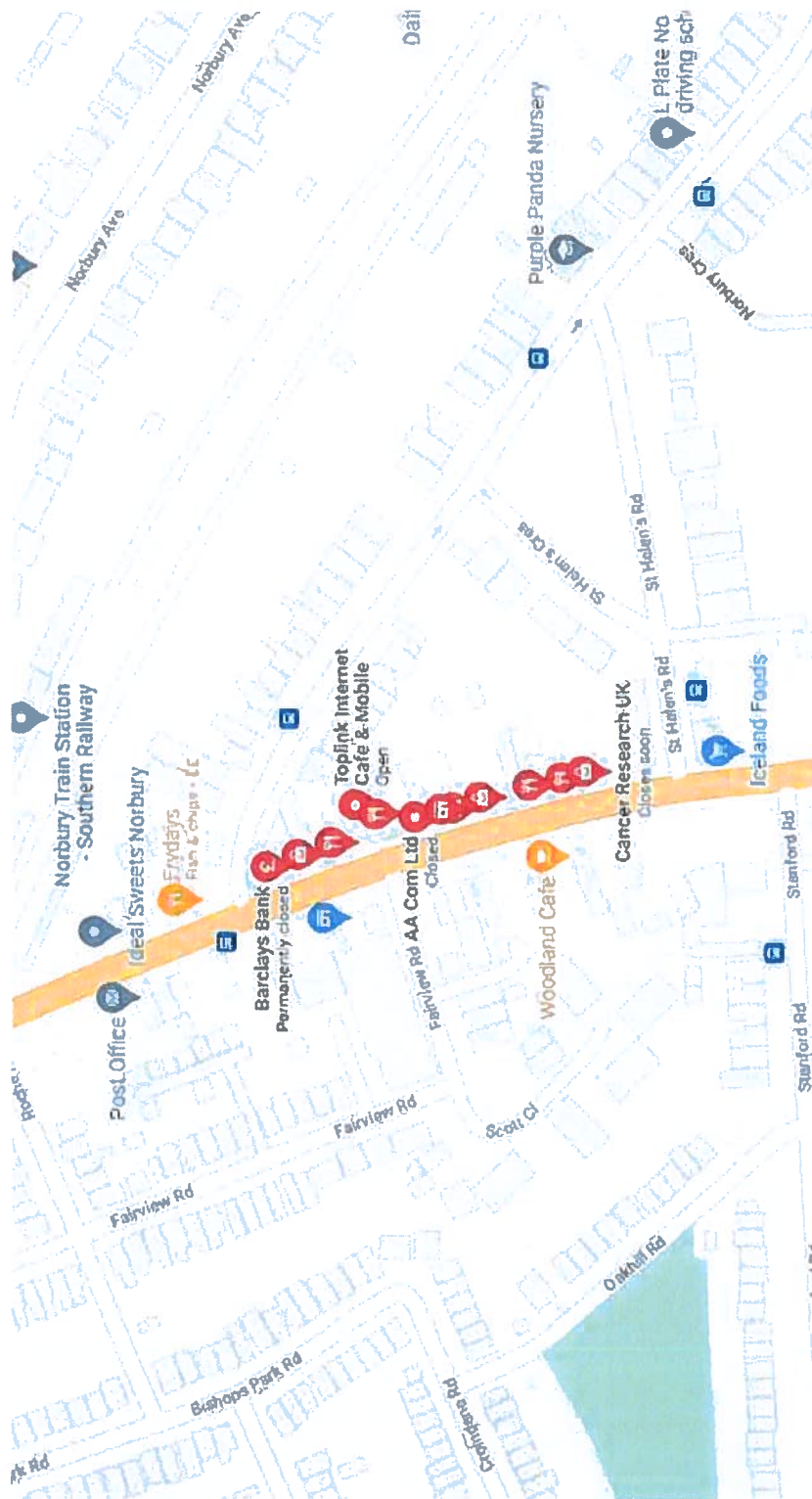
This Risk Assessment has been prepared by 2 Internal Compliance Auditor who researched the area before visiting and finalizing the report. As a Senior Compliance Auditor I have reviewed their report prior to submitting it.

This document provides an assessment of risk at premise level relating to the provision of these facilities for gambling. Merkur Slots is a national operator and employs several standard policies, procedures and control measures across all premises. These issues are clearly articulated in the "Compliance Manual" to be found in the premise and in our Player Protection Framework. The company also carries out premise's security risk assessments (available on request) and health and safety risk assessments which inter alia relate to the objective of keeping crime out of gambling.

Where relevant, Merkur Slots has also considered any substantive local risks identified in a wide range of policy statements related to gambling and local area profiles specifically related to gambling. However, the company does not operate discriminatory policies against any identified groups based on social demographic or ethnic origin. Therefore, identification of issues relating to gambling related harm are based on individual customer behaviour even where particular groups are identified through research at being at greater risk of gambling related harm.

Assessors Name:	- Internal Compliance Auditors
Signature:	
Date:	10/02/2022

Merkur Slots, 1432-1434 London Road, Norbury, SW16 4BZ



Merkur Slots, 1432-1434 London Road, Norbury, SW16 4BZ – Shop frontage example



WORKING TOGETHER



Accredited by the Global
Gambling Guidance Group

THE MERKUR FAMILY



PART OF THE GAUSELMANN GROUP

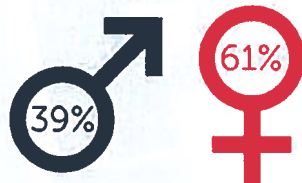
A Strong Partner For More Than 60 Years



**MERKUR
CASINO**

Merkur Casino UK, formerly Praesepe, is a subsidiary of the family run Gauselmann Group who are based in Espelkamp (Germany). Over the last 60 years the group has grown to operate more than 700 venues across Europe under the Merkur Brand. Millions of enthusiastic guests at home and abroad know our logo. The laughing MERKUR Sun is a guarantor for the best entertainment.

Merkur Casino UK employs over 1,600 people (61% Female) over 3 Bingo Clubs, over 180 High Street gaming centres and 3 Family Entertainment Centres under two main brands.



61% of employees are female
39% of employees are male



**MERKUR
SLOTS**

Merkur Slots is the main UK brand. All Merkur Cashino and Cashino Gaming venues will be rebranded into this new name over time. Our venues represent the very best in terms of exciting 'slot gaming' entertainment through delivering to our customers the latest in venue product and atmosphere. These venues are known for their highly trained teams and first class face to face service.



**MERKUR
BINGO**

Merkur Bingo clubs, formerly Beacon Bingo, are very important to our customers in their local communities. Our teams strive to deliver not just great service but a Bingo experience which focusses on ambience, safety and fun in a modern environment. The flagship venue at Cricklewood, in North London, is the largest in Europe.

HIGH STREET BINGO

What is it?

Bingo is one of the UK's favourite pastimes and Praesepe is one of the UK's largest operators of licensed bingo and arcade premises. Our High Street Bingo Venues:



Offer more local, convenient locations to play Bingo rather than travelling to larger clubs.

Our teams remain with the customers on the venue floor rather than behind a counter.



Our customers can attend and play bingo at any time with the numbers auto-called.



The market on the high street has evolved with venues now providing Electronic Bingo Tablets.



Bingo is available for play from 9am until midnight.

Our Bingo terminals offer B3, Cat C and Cat D products with an average stake of between 30-40p stake.



Bingo Terminals





RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

Think 25 Messaging



Players in Venue



We Are Not A Problem

Being a responsible operator is high priority across the Gauselmann group and in the UK, Merkur Casino is always looking at ways to adhere to the three licensing objectives as technology and customer behaviour changes.

GAMBLING COMMISSION

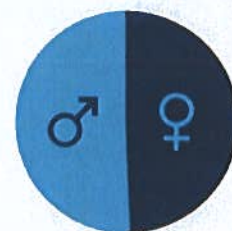
Merkur Casino is regulated by the Gambling Commission and Licensing Authorities



We do not sell or serve alcohol in our venues. We provide complimentary refreshments, teas and coffees, to customers. Our staff will not allow anyone into the premises who appears to be intoxicated.



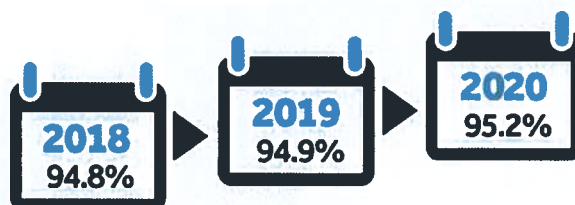
We are immensely proud of the fact that we have never had a licence revoked or even reviewed. Incidents are extremely rare. We simply do not generate noise and anti-social behaviour.



Our venues operate a Think 25 policy whereby any persons who look under 25 have to produce a form of photo ID.



Our venues appeal to all ages with our membership gender database split of 52 % Male / 48% Female



Our venues have 3 external age tests per year with a compliance rate of over 94% for the last 3 years, compared to other leisure and gambling sectors that sit around 80%.

SOCIAL RESPONSIBILITY MEASURES IN PLACE



In Venue

Operationally we have a number of measures in place to protect our customers. Throughout the business Merkur Casino also has a number of socially responsible gambling tools, and management and training initiatives that include:



All staff complete on-boarding and six-monthly refresher training on "The Essentials of Compliance and Social Responsibility" and "Safeguarding Children and Vulnerable People".



Dedicated Learning & Development Team and National training centres.

IHL SMART tablet in every venue for the recording of customer interactions, self-exclusions, incidents and alerts.



All data is centrally reviewed and evaluated by an independent Audit/Compliance team.



Six monthly compliance audits to help identify training needs in venue.

Local Area Risk Assessments are updated annually to identify any changes in the local area.



PlayRight app installed in all venues that is a self-help tool for customers to manage their gambling.

Compliance



Training Centre



PlayRight App



Online Training





Machine Messaging



Customer Interaction Training



SOCIAL RESPONSIBILITY MEASURES IN PLACE

All Levels

We provide an annual assurance statement to the Gambling Commission. This officially details the Board's commitment to the company values, purpose and culture and the accountability placed on delivery of the licensing objectives.



The statement contains information on how we operate effective governance, regulatory risk management, compliance controls, social responsibility and safer gambling initiatives.



It is also an opportunity to set out any initiatives relating to significant changes being introduced to improve control systems, risk-management, governance and safer gambling. Our recent commitments include: Socially Responsible Machine Messaging; Customer Set Your Limits; SMART Alert application to report criminal activity; opening our Second National Training Centre; Think 25 messaging and Customer Interaction Training.



Merkur Casino UK received the international certificate of accreditation from the Global Gambling Guidance Group (G4). Our Merkur 360 programme showcases how we are continually improving our social responsibility commitments throughout all levels of the business.

Merkur Casino UK also engages with the Bingo Association, Bacta and Gambling Business Group bodies.



- Senior Manager representation Divisional meetings.
- Operations Director is the Chair for division 3 representing Adult Gaming Centres.
- Member of the National Council.
- Head of Compliance is Vice Chair of the Social Responsibility Committee.
- Operations Director and Head of Compliance are Directors.
- Head of Compliance is a member of the Social Responsibility Committee.

BENEFITS TO THE HIGH STREET



Benefits for your High Street include:



Over 90% of new Merkur Slots venues occupy former vacant units.



Investment from £100,000 to £250,000 in long-standing vacant venues.



Linked trips with other shops helping to support other businesses.



Local jobs for between 6 and 12 people depending on the hours of operation.



Increased footfall to the High Street.



We provide an important natural surveillance on the high street, particularly late into the evenings.

COMMUNITY & CHARITY

Merkur Initiative

Supporting Local Charities and Good Causes

Amongst other charities, some of your donations have helped:



Merkur Casino UK has raised in excess of
£1.2 million for good causes since 2005

Merkur Casino UK
Seebeck House
1A Seebeck Place
Knowlhill
Milton Keynes
MK5 8FR



Rep 1.**Review Application for Bingo Premises – Merkur Slots, 1432-4 London Rd, SW16 4BZ**

As a local resident, I feel strongly that granting a license will be morally irresponsible. I object on the ground of:

- 1. preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.**

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

- **protecting children and other vulnerable persons from being harmed or exploited by gambling**

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. A lot of secondary school students use Norbury High St because of its public transport and shop at the take-aways. Those coming out of Norbury Railway Station to walk to the bus stop on London Rd to travel south will pass the premises. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers - and to the risks of antisocial behaviour linked to betting while en route to school, to Norbury and Norbury Hall Parks and local shops.

We witness begging on Norbury High St. It should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy

thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of those sleeping in the flats above the shops along the High St.

‘ It should be noted that the Enfield Licensing Sub-committee rejected an application for a games arcade from another company Future Leisure Ltd, that has premises in New Addington because it was ‘not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young people & vulnerable persons from being harmed or exploited by gambling, especially as the premises are close to many local schools & the train station meaning that many people would pass it regularly.’ It further was ‘persuaded that these premises will add to/increase the existing problems of crime & anti-social disorder within this ward.’

It was also concerned about the narrowness of the pavement outside the premises ‘making it difficult if not impossible to patrol, as the applicant has suggested they will.’

Please reject Merkur Slots application.

Rep 2.

I wish to raise a objection to the above application for opening a slot Machine Venue at the old Barclays Bank building in Norbury.

My main objection to protect young people and vulnerable persons from being exploited by such a venue. We already have 3 Betting shops and 2 Shiah's bars.

My other objection is trying to stop and prevent added crime and disorder to an area that has a high street which is already run down and has a high rate of crime. This is a poor residential area.

Rep 3.

As a local resident, I feel strongly that granting a licence will be morally irresponsible. I object on the grounds of:

- 1) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.**

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

2) protecting children and other vulnerable persons from being harmed or exploited by gambling

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. A lot of secondary school students use Norbury High St because of its public transport and shop at the take-aways. Those coming out of Norbury Railway Station to walk to the bus stop on London Rd to travel south will pass the premises. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers - and to the risks of antisocial behaviour linked to betting while en route to school, to Norbury and Norbury Hall Parks and local shops.

We witness begging on Norbury High St. It should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of those sleeping in the flats above the shops along the High St.

'It should be noted that the Enfield Licensing Sub-committee rejected an application for a games arcade from another company Future Leisure Ltd, that has premises in New Addington because it was 'not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young people & vulnerable persons from being harmed or exploited by gambling, especially as the premises are close to many local schools & the train station meaning that many people would pass it regularly.' It further was 'persuaded that these premises will add to/increase the existing problems of crime & anti-social disorder within this ward.'

3) It was also concerned about the narrowness of the pavement outside the premises 'making it difficult if not impossible to patrol, as the applicant has suggested they will.'

Please reject Merkur Slots application.

Rep 4.

Re: **Review Application for Bingo Premises – Merkur Slots, 1432-4 London Rd, SW16 4BZ**

As a local resident, I feel strongly that granting a license will be morally irresponsible. I am totally opposed to this for the following reasons:

Preventing gambling from being a fomenter of disorder and petty crime

There are four betting shops already. We do not need or want another gambling centre in the area. It is well-known that these venues attract petty crime and more serious criminality. These places encourage negative behaviour patterns that affect not just the individuals themselves, but families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about my wife walking home from the station when gamblers will be going in and out of the premises looking for more money. I have even been troubled by beggars walking up behind me on Norbury High St and I'm 6ft 2 and 16 stone. A bingo arcade will surely make the situation worse.

Protecting children and other vulnerable people from harm and exploitation

This location between the train station and bus stop is passed by school children of all ages. This type of venue is totally unsuitable. Even if they are not attracted by the bright lights and flashy signs, children will be exposed to gamblers – and to the risks of antisocial behaviour linked to betting between school, local shops and home.

Making the high street a safe and better place

The high street should be a safe place. TfL has just imposed a 20mph limit to make it safer and Croydon Council should reject this application to keep children safe.

Croydon should be building art and sports facilities for children to give them opportunities and good health, not encouraging wasted lives.

Please reject Merkur Slots application.

Rep 5.

Letter Of Objection

Review Application for Bingo Premises – Merkur Slots, 1432-4 London Rd, SW16 4BZ

To whom it concerns

As a local resident, I feel strongly that granting a license will be morally irresponsible. I object on the grounds of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money-laundering and criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this business will attract after hours is a concern, especially when the police are under-resourced. As a female, I am also concerned about walking down the high street late at night when gamblers will be going in and out and lingering around the premises.

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

This type of venue is totally unsuitable in this area with a large number of growing families and an older population, especially as London already has the highest pensioner poverty in the country. A lot of secondary school students use Norbury High St because of its public transport and take-aways. Those coming out of Norbury Railway Station to walk to the bus stop on London Rd in order to travel south will pass the premises. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers – and to the risks of antisocial behaviour linked to betting while en route to school, to Norbury and to Norbury Hall Park and local shops.

We already witness begging on Norbury High St. It should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis. It will be Croydon Council picking up the bill when people end up in crisis and debt.

Gambling is also related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups, again Croydon Council social services will be impacted and they are already under funded and under resourced.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of those sleeping in the flats above the shops along the High St.

It should be noted that the Enfield Licensing Sub-committee rejected an application for a games arcade from another company Future Leisure Ltd, that has premises in New Addington because it was 'not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young people & vulnerable persons from being harmed or exploited by gambling, especially as the premises are close to many local schools & the train station meaning that many people would pass it regularly.' It further was 'persuaded that these premises will add to/increase the existing problems of crime & anti-social disorder within this ward.'

It was also concerned about the narrowness of the pavement outside the premises 'making it difficult if not impossible to patrol, as the applicant has suggested they will.'

Please reject Merkur Slots application.

Rep 6.

Please note my objections for the above application. Whilst not a licensing matter the premises does not have planning permission therefore this application is premature.

I am a local resident and object on the following grounds:

- prevention of crime and disorder - this will encourage crime and disorder on a street which already has betting establishments
- prevention of public nuisance - the loitering and use will create a public nuisance. Especially people smoking outside.
- protection of children from harm - lots of schools in the area, it is an unacceptable location and use.

Rep 7.

I would like to oppose the proposal of opening up Merkur slots on the site of the Barclays Bank building. These type of gaming companies are a scourge to society and represent no positive impact socially or economically to the local area.

In 2019, the Department of Health and Social Care commissioned PHE to undertake a review of the evidence on gambling harms. The review includes the most comprehensive estimate of the economic burden of gambling on society to date, revealing that the harms associated with **gambling cost at least £1.27 billion** in 2019 to 2020 in England alone. This analysis includes the first estimate of the economic cost of suicide (£619.2 million) and provides an updated cost of homelessness associated with harmful gambling (62.8 million). Gambling related harms in the analysis range from financial such as bankruptcy and employment issues, to family issues, and health harms such as suicide. The review also shows that people at risk of gambling harms are concentrated in areas of higher deprivation

Looks like the odds are already stacked in their favour but I shall persist with my objection for now. As the report I linked you to states, 'people at risk of gambling harms are concentrated in areas of higher deprivation' According to the latest Indices of Multiple Deprivation (IMD, September 2019), Croydon is the most deprived of the six Southern Region boroughs in the current GLA London Plan. I would therefore suggest that fits in quite nicely with grounds C of my list of options to choose from. The report states 'The most socio-economically deprived and disadvantaged groups in England have the highest levels of harmful gambling and they are also the most susceptible to harm' I.E vulnerable. We already have a number of gambling premises on the high road and I think this would further compound the problem.

Rep 8.

As a longstanding resident of Norbury, I would like to object to this application, with reference to the Gambling Act 2005 licensing objectives which I understand include the following:

- (a) Preventing gambling from being a source of crime or disorder.... *Norbury already has a number of betting shops. This so-called "bingo" establishment will only add to the opportunities and additional time for gambling when the other shops are closed. This is not any kind of traditional bingo hall and is not needed in this area.*

(b) Ensuring that gambling is conducted in a fair and open way/prevention of public nuisance *the location on the high street/corner of Norbury Crescent and not far from the railway station is unsuitable. The proposed establishment is likely to encourage loitering on this corner, particularly if people are smoking or indeed drinking/eating outside and*

could cause anti-social behaviour. There is no parking and the proposed late opening hours will cause disturbance to the many local residents who live in that area.

(c) Protecting children and other vulnerable persons from being harmed or exploited by gambling.... *the location is not far from some schools, shiny machines likely to attract them into the establishment; what controls will be in place not to have machines on show and who will check ages, control access etc.*

Rep 9.

As a local resident, I object strongly to the proposal for a slots / gambling business in London Rd. I object on the grounds of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises. This part of London Rd is essentially Norbury High St - a neighbourhood collection of shops and food businesses not suited to gambling and 'casinos'.

▪ **protecting children and other vulnerable persons from being harmed or exploited by gambling**

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. A lot of secondary school students use Norbury High St because of its public transport and shop at the take-aways. Those coming out of Norbury Railway Station to walk to the bus stop on London Rd to travel south will pass the premises. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers – and to the risks of antisocial behaviour linked to betting while en route to school, to Norbury and Norbury Hall Parks and local shops.

We witness begging on Norbury High St. It should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy thrive. The opening of an Adult Gaming Centre until 2am in a prime spot in the high street would be highly detrimental to those efforts.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of those sleeping in the flats above the shops along the High St. Norbury High St is a neighbourhood high st - not a place to support the 'night time economy'

The company is not shown to be fit to manage or risk assess the impact on crime and young people:

In Norbury High St It is inevitable that clients will congregate outside - typically to smoke - and that this will block the pavement close to the train station, and to the pedestrian crossing.

I work late into the evening (theatre) and do not want to walk past groups of people engaged in anti-social behaviour such as gambling and smoking in the street.

The police are already struggling.

Rep 10.

I would like to object to the proposed application for a licence by Merkur Slots at 1432-4 London Road, SW16 4BZ.

The proximity to the train station makes this building unsuitable for a gambling premises. Unless you are only visiting the shops or homes next to the station, in order to travel south from Norbury train station you have to pass this building and notably both Norbury bus stops heading south are just past this building. Such a prominent location on our high street normalises gambling for children and young people and does not protect them or vulnerable people from being exploited by gambling.

Furthermore, there is no need for another gambling premises on the Norbury high street as we already have 5 betting shops in close proximity which have gaming machines. In addition, there are casinos nearby in Streatham, Thornton Heath and Croydon.

Given the number and proximity of nearby casinos and betting shops, I consider it doubtful that Merkur will provide additional footfall to the area and local businesses as suggested. There is no benefit to Norbury high street in granting this licence application.

A recent report on gambling found: 'Gambling venues are concentrated in the most deprived areas of Britain, against the wishes of people who live nearby, according to a report commissioned by the Standard Life Foundation charity. "Those with the least resources are being targeted more," the report says.' Norbury is not a deprived area but it is not a wealthy area and better safeguards should be put in place for the young people growing up in areas like ours.

I trust you will take our concerns into account and deny the licence.

Rep 11.

**I am writing to you to voice my strong objection to the below proposed Mercur Slots
Bingo application:**

Review Application for Bingo Premises – Merkur Slots, [1432-4 London Rd, SW16 4BZ](#)

As a local resident, I feel strongly that granting a license will be morally irresponsible & hugely detrimental to the local area. I object on the grounds of:

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

We do not need another gambling centre in Norbury. There is already a concentration of four betting shops on the small high street in close proximity to the proposed new gambling premises.

As a woman I am also concerned about walking down the high street both during daylight hours & at night when groups of gamblers - mostly men- will be going in and out of the premises.

There is already a problem with PSH in Norbury- specifically groups of male gamblers congregating outside Norbury's existing betting shops - often drunk- leering at passing women - including myself - as well as unaccompanied schoolchildren which is totally unacceptable.

There is a well-known risk that these venues attract money laundering & criminality. Gambling venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced- and there is no real visible police presence in Norbury anyway!

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

There are now multiple beggars stationed along Norbury High St. It should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy

thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The location of the premises is totally inappropriate- both close to 4x other existing betting shops & situated near to local schools & the train station. Having yet another gambling venue in central Norbury en route to the main transport hub of the station as well as local schools means that gambling will be normalised for children, young people & vulnerable persons prone to exploitation by gambling- as they will literally be passing the venue multiple times on a daily basis.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of families sleeping in the flats above the shops along the High St as well as the surrounding residential streets.

Overall the addition of the Merkur Slots gaming Centre would be detrimental to Norbury & its community as a whole- if Croydon Council wants to actively repel families & hard working people out of the area, degrading the high street even further then this would surely do the trick!

Please reject Merkur Slots application.

Rep 12.

I am writing to you to voice my strong objection to the below proposed Mercur Slots Bingo application:

Review Application for Bingo Premises – Merkur Slots, 1432-4 London Rd, SW16 4BZ

As a local resident, I feel strongly that granting a license will be morally irresponsible & hugely detrimental to the local area. I object on the grounds of:

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

We do not need another gambling centre in Norbury. There is already a concentration of four betting shops on the small high street in close proximity to the proposed new gambling premises.

As a woman I am also concerned about walking down the high street both during daylight hours & at night when groups of gamblers - mostly men- will be going in and out of the premises.

There is already a problem with PSH in Norbury- specifically groups of male gamblers congregating outside Norbury's existing betting shops - often drunk- leering at passing women - including myself - as well as unaccompanied schoolchildren which is totally unacceptable.

There is a well-known risk that these venues attract money laundering & criminality. Gambling venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern,

especially when the police are under-resourced- and there is no real visible police presence in Norbury anyway!

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

There are now multiple beggars stationed along Norbury High St. It should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The location of the premises is totally inappropriate- both close to 4x other existing betting shops & situated near to local schools & the train station. Having yet another gambling venue in central Norbury en route to the main transport hub of the station as well as local schools means that gambling will be normalised for children, young people & vulnerable persons prone to exploitation by gambling- as they will literally be passing the venue multiple times on a daily basis.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of families sleeping in the flats above the shops along the High St as well as the surrounding residential streets.

Overall the addition of the Merkur Slots gaming Centre would be detrimental to Norbury & its community as a whole- if Croydon Council wants to actively repel families & hard working people out of the area, degrading the high street even further then this would surely do the trick!

Please reject Merkur Slots application.

Rep 13.

As a local resident, I feel strongly that granting a license will be morally irresponsible. I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the

police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

- **protecting children and other vulnerable persons from being harmed or exploited by gambling**

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. A lot of secondary school students use Norbury High St because of its public transport and shop at the take-aways. Those coming out of Norbury Railway Station to walk to the bus stop on London Rd to travel south will pass the premises. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers – and to the risks of antisocial behaviour linked to betting while en route to school, to Norbury and Norbury Hall Parks and local shops.

We witness begging on Norbury High St. It should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

We have a teenage Grandson and would be very concerned that this establishment which will no doubt become a prominent building with luring lights along our High Street would be a great temptation to him and other local teenagers.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of those sleeping in the flats above the shops along the High St.

‘ It should be noted that the Enfield Licensing Sub-committee rejected an application for a games arcade from another company Future Leisure Ltd, that has premises in New Addington because it was ‘not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young people & vulnerable persons from being harmed or exploited by gambling, especially as the premises are close to many local schools & the train station meaning that many people would pass it regularly.’ It further was ‘persuaded that these premises will add to/increase the existing problems of crime & anti-social disorder within this ward.’

Please reject Merkur Slots application.

Rep 14.

As a local resident, I feel strongly that granting a license will be morally irresponsible. I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

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

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. A lot of secondary school students use Norbury High St because of its public transport and shop at the take-aways. Those coming out of Norbury Railway Station to walk to the bus stop on London Rd to travel south will pass the premises. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers – and to the risks of antisocial behaviour linked to betting while en route to school, to Norbury and Norbury Hall Parks and local shops.

Norbury High Street should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of those sleeping in the flats above the shops along the High St.

It should be noted that the Enfield Licensing Sub-committee rejected an application for a games arcade from another company, Future Leisure Ltd that has premises in New Addington because it was 'not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young people & vulnerable persons from being harmed or exploited by gambling, especially as the premises are close to many local schools

& the train station meaning that many people would pass it regularly.' It further was 'persuaded that these premises will add to/increase the existing problems of crime & anti-social disorder within this ward.'

Please reject Merkur Slots application.

Rep 15.

Review Application for Bingo Premises – Merkur Slots, 1432-4 London Rd, SW16 4BZ

As a local resident, and a parent, I feel strongly that granting a license will be morally irresponsible. I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced.

2. protecting children and other vulnerable persons from being harmed or exploited by gambling

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. A lot of secondary school students use Norbury High St because of its public transport and shop at the take-aways. Those coming out of Norbury Railway Station to walk to the bus stop on London Road to travel south will pass the premises.

Neon lights and an alluring shop front will attract a child/young adult's attention. I know that my 4 year old daughter will want to know what is in the shop. And it is not a conversation I should be having. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers – and to the risks of antisocial behaviour linked to betting while en route to nursery, school, to Norbury and Norbury Hall Parks and local shops. We already see disheveled men drinking beer outside betting shops while on our way to nursery in the morning.

We witness begging on Norbury High St. We should not be encouraging wasting money and getting into debt through gambling, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy

thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of those sleeping in the flats above the shops along the High St.

It should be noted that the Enfield Licensing Sub-committee rejected an application for a games arcade from another company Future Leisure Ltd, that has premises in New Addington because it was 'not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young people & vulnerable persons from being harmed or exploited by gambling, especially as the premises are close to many local schools & the train station meaning that many people would pass it regularly.' It further was 'persuaded that these premises will add to/increase the existing problems of crime & anti-social disorder within this ward.' It was also concerned about the narrowness of the pavement outside the premises 'making it difficult if not impossible to patrol, as the applicant has suggested they will.'

Please reject Merkur Slots application.

Rep 16.

Review Application for Bingo Premises – Merkur Slots, 1432-4 London Rd, SW16 4BZ

As a local resident, I feel strongly that granting a license will be morally irresponsible. I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

- **protecting children and other vulnerable persons from being harmed or exploited by gambling**

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. A lot of secondary school students use Norbury High St because of its public transport and shop at the take-aways. Those coming out of Norbury Railway Station to walk to the bus stop on London Rd to travel south will pass the premises. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers – and to the risks of antisocial behaviour linked to betting while en route to school, to Norbury and Norbury Hall Parks and local shops.

We witness begging on Norbury High St. It should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of those sleeping in the flats above the shops along the High St.

It should be noted that the Enfield Licensing Sub-committee rejected an application for a games arcade from another company Future Leisure Ltd, that has premises in New Addington because it was 'not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young people & vulnerable persons from being harmed or exploited by gambling, especially as the premises are close to many local schools & the train station meaning that many people would pass it regularly.' It further was 'persuaded that these premises will add to/increase the existing problems of crime & anti-social disorder within this ward.'

It was also concerned about the narrowness of the pavement outside the premises 'making it difficult if not impossible to patrol, as the applicant has suggested they will.'

Please reject Merkur Slots application.

Rep 17.

As a local resident, I feel strongly that granting a license will be morally irresponsible. I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

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

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. A lot of secondary school students use Norbury High St because of its public transport and shop at the take-aways. Those coming out of Norbury Railway Station to walk to the bus stop on London Rd to travel south will pass the premises. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers – and to the risks of antisocial behaviour linked to betting while en route to school, to Norbury and Norbury Hall Parks and local shops.

We witness begging on Norbury High St. It should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of those sleeping in the flats above the shops along the High St.

'It should be noted that the Enfield Licensing Sub-committee rejected an application for a games arcade from another company Future Leisure Ltd, that has premises in New Addington because it was 'not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young people & vulnerable persons from being harmed or exploited by gambling, especially as the premises are close to many local schools & the train station meaning that many people would pass it regularly.' It further was 'persuaded that these premises will add to/increase the existing problems of crime & anti-social disorder within this ward.'

It was also concerned about the narrowness of the pavement outside the premises 'making it difficult if not impossible to patrol, as the applicant has suggested they will.'

Please reject Merkur Slots application.

Rep 18.

Review Application for Bingo Premises – Merkur Slots, 1432-4 London Rd, SW16 4BZ.

I feel strongly as a local Norbury resident that granting a license for the above application will be morally irresponsible. I object on the grounds of:

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

Another gambling outlet on London Road within Norbury is completely unnecessary. Our community already has a concentration of **FOUR** betting shops in close proximity to the facility proposed at the above address.

There is a well-known risk that these venues attract money laundering and criminality. Such venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract during evening and late night hours is of concern, especially when the police in the area are already under-resourced. I

have concerns about myself or family walking along the high street near to this venue late at night when patrons will be going in and out of the premises.

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

As an expectant father I see this type of venue as totally unsuitable in an area which has a ever increasing number of young families. School students of various ages use Norbury High Street to access public transport links. Those coming from Norbury Railway Station traveling south will pass the above premises. I am concerned that in time my children will become normalised to gambling on the high street. I do not wish for children in the area to be exposed to gamblers – or to the risks of antisocial behaviour linked to betting while en route to school or other activities. This is not acceptable!

It should be noted that the Enfield Licensing Sub-committee rejected an application for a games arcade from another company Future Leisure Ltd, who have a premises in New Addington because it was **‘not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young people & vulnerable persons from being harmed or exploited by gambling, especially as the premises are close to many local schools & the train station meaning that many people would pass it regularly.’** It further was **‘persuaded that these premises will add to/increase the existing problems of crime & anti-social disorder within this ward.’**

Prior to the COVID-19 Pandemic, local Councillors and Residents Associations had been working hard on producing an action plan that would improve and support the high street, with the view of making it a more pleasant environment for the community. We as a local community are keen to see the local day and evening economy thrive. The opening of a 24-hour Adult Gaming Centre in a prime location on the high street would be severely detrimental to those efforts.

For the good of the community of Norbury please reject the Merkur Slots application.

Rep 19.

Review Application for Bingo Premises – Merkur Slots, 1432-4 London Rd, SW16 4BZ.

As a local resident, I feel strongly that granting a license for the above application will be morally irresponsible. I object on the ground of:

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

Another gambling outlet on London Road within Norbury is completely unnecessary. Our community already has a concentration of **FOUR** betting shops in close proximity to the facility proposed at the above address.

There is a well-known risk that these venues attract money laundering and criminality. Such venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract during evening and late night hours is of concern, especially when the police in the area are already under-resourced. I have concerns about myself or family walking along the high street near to this venue late at night when patrons will be going in and out of the premises.

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

As an expectant mother I see this type of venue as totally unsuitable in an area which has a ever increasing number of young families. School students of various ages use Norbury High Street to access public transport links. Those coming from Norbury Railway Station traveling south will pass the above premises. I am concerned that in time my children will become normalised to gambling on the high street. I do not wish for children in the area to be exposed to gamblers – or to the risks of antisocial behaviour linked to betting while en route to school or other activities. This is not acceptable!

It should be noted that the Enfield Licensing Sub-committee rejected an application for a games arcade from another company Future Leisure Ltd, who have a premises in New Addington because it was **'not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young people & vulnerable persons from being harmed or exploited by gambling, especially as the premises are close to many local schools & the train station meaning that many people would pass it regularly.'** It further was **'persuaded that these premises will add to/increase the existing problems of crime & anti-social disorder within this ward.'**

Prior to the COVID-19 Pandemic, local Councillors and Residents Associations had been working hard on producing an action plan that would improve and support the high street, with the view of making it a more pleasant environment for the community. We as a local community are keen to see the local day and evening economy thrive. The opening of a 24-hour Adult Gaming Centre in a prime location on the high street would be severely detrimental to those efforts.

For the good of the community of Norbury please reject the Merkur Slots application.

Rep 20.

As a local resident, I feel strongly that granting a license will be morally irresponsible. I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

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

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. A lot of secondary school students use Norbury High St because of its public transport and shop at the take-aways. Those coming out of Norbury Railway Station to walk to the bus stop on London Rd to travel south will pass the premises. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers – and to the risks of antisocial behaviour linked to betting while en route to school, to Norbury and Norbury Hall Parks and local shops.

We witness begging on Norbury High St. It should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of those sleeping in the flats above the shops along the High St.

‘ It should be noted that the Enfield Licensing Sub-committee rejected an application for a games arcade from another company Future Leisure Ltd, that has premises in New Addington because it was ‘not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young people & vulnerable persons from being harmed or exploited by gambling, especially as the premises are close to many local schools & the train station meaning that many people would pass it regularly.’ It further was ‘persuaded that these premises will add to/increase the existing problems of crime & anti-social disorder within this ward.’

3It was also concerned about the narrowness of the pavement outside the premises ‘making it difficult if not impossible to patrol, as the applicant has suggested they will.’

Rep 21.

Review Application for Bingo Premises – Merkur Slots,1432-4 London Rd, SW16 4BZ

As a local resident, I feel strongly that granting a license will be morally irresponsible. I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are

under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

2. protecting children and other vulnerable persons from being harmed or exploited by gambling

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. A lot of secondary school students use Norbury High St because of its public transport and shop at the take-aways. Those coming out of Norbury Railway Station to walk to the bus stop on London Rd to travel south will pass the premises. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers – and to the risks of antisocial behaviour linked to betting while en route to school, to Norbury and Norbury Hall Parks and local shops.

We witness begging on Norbury High St. It should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of those sleeping in the flats above the shops along the High St.

'It should be noted that the Enfield Licensing Sub-committee rejected an application for a games arcade from another company Future Leisure Ltd, that has premises in New Addington because it was 'not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young people & vulnerable persons from being harmed or exploited by gambling, especially as the premises are close to many local schools & the train station meaning that many people would pass it regularly.' It further was 'persuaded that these premises will add to/increase the existing problems of crime & anti-social disorder within this ward.' It was also concerned about the narrowness of the pavement outside the premises 'making it difficult if not impossible to patrol, as the applicant has suggested they will.'

Please reject Merkur Slots licensing application.

Rep 22.

Review Application for Bingo Premises – Merkur Slots, 1432-4 London Road, Norbury SW16 4BZ

Dear Sir/Madam/Committee members

As a local resident, I feel strongly that granting a license will be morally irresponsible. I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

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

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. A lot of secondary school students use Norbury High St because of its public transport and shop at the take-away. Those coming out of Norbury Railway Station to walk to the bus stop on London Road to travel south will pass the premises. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers - and to the risks of antisocial behaviour linked to betting while on route to school, to Norbury and Norbury Hall Parks and local shops.

We witness begging on Norbury High Street It should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp **increase** in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high Street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of those sleeping in the flats above the shops along the High Street.

It should be noted that the Enfield Licensing Sub-committee rejected an application for a games arcade from another origination, that has premises in New Addington because it was

'not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young & vulnerable persons from being harmed or exploited by gambling, especially as the premises are close to many local schools & the train station meaning that many people would pass it regularly.' It further was 'persuaded that these premises will add to/increase the existing problems of crime & anti-social disorder in Norbury.'

- 3 It was also concerned about the narrowness of the pavement outside the premises 'making it difficult if not impossible to patrol, as the applicant has suggested they will.'
- 4 I would be grateful the said application is rejected

Rep 23.

As a local resident, I feel strongly that granting a license will be morally irresponsible. I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

- ☐ **protecting children and other vulnerable persons from being harmed or exploited by gambling**

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. A lot of secondary school students use Norbury High St because of its public transport and shop at the take-aways. Those coming out of Norbury Railway Station to walk to the bus stop on London Rd to travel south will pass the premises. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers – and to the risks of antisocial behaviour linked to betting while en route to school, to Norbury and Norbury Hall Parks and local shops.

We witness begging on Norbury High St. It should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy

thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of those sleeping in the flats above the shops along the High St.

‘ It should be noted that the Enfield Licensing Sub-committee rejected an application for a games arcade from another company Future Leisure Ltd, that has premises in New Addington because it was ‘not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young people & vulnerable persons from being harmed or exploited by gambling, especially as the premises are close to many local schools & the train station meaning that many people would pass it regularly.’ It further was ‘persuaded that these premises will add to/increase the existing problems of crime & anti-social disorder within this ward.’

It was also concerned about the narrowness of the pavement outside the premises ‘making it difficult if not impossible to patrol, as the applicant has suggested they will.’

Please reject Merkur Slots application.

Rep 24.

1st email.

As a local business person and a long time supporter of Love Norbury, I feel strongly that granting a license will be morally irresponsible. I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

- **protecting children and other vulnerable persons from being harmed or exploited by gambling** This type of venue is totally unsuitable in this area with a large number of growing families and elderly. A lot of secondary school students use Norbury High St because of its public transport and shop at the take-aways. Those coming out of Norbury Railway Station to walk to the bus stop on London Road to travel south will pass the premises. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers – and to the risks of antisocial behaviour linked to betting while en route to school, to Norbury and Norbury Hall Parks and to local shops.

We witness begging on Norbury High St. It should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Before COVID the local Councillors and the Resident's Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The proposed operating hours are unacceptable as noise will be created in the early hours to the detriment of those sleeping in the flats above the shops along the High St.

' It should be noted that the Enfield Licensing Sub-committee rejected an application for a games arcade from another company Future Leisure Ltd, that has premises in New Addington because it was 'not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young people & vulnerable persons from being harmed or exploited by gambling, especially as the premises are close to many local schools & the train station meaning that many people would pass it regularly.' It further was 'persuaded that these premises will add to/increase the existing problems of crime & anti-social disorder within this ward.'

It was also concerned about the narrowness of the pavement outside the premises 'making it difficult if not impossible to patrol, as the applicant has suggested they will.'

Please reject Merkur Slots application.

2nd email.

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

Gambling has always been a source of crime. Gambling can lead to bankruptcy, crime, domestic abuse, and even suicide. A single bankruptcy could potentially impact 17 people. This recent review on gambling includes the most comprehensive estimate of the economic burden of gambling on society to-date, revealing that the harms associated with gambling cost at least **£1.27 billion in 2019 to 2020 in England alone**. For you to even ask these spurious questions is a 'shame on you'.

Instead of buying food or paying for exercise class people will to use their money to gamble, because gambling can lead to addiction. Of course this is going to affect not only my business but every business in Norbury. If it could be stopped, we would not have the figures mentioned above.

(b) ensuring that gambling is conducted in a fair and open way, and

If you want to ensure that gambling is conducted in a fair and open way, TAKE IT OUT OF POOR AND VULNERABLE NEIGHBOURHOODS.

Gambling involves placing something of value at risk in the hopes of gaining something of greater value, and includes casino gambling, lotteries, and internet gambling and bingo.

Gambling is not an ordinary activity: it is a health-harming addictive behaviour, recently recognised in the International Classification of Diseases 11th Revision (ICD-11) and Diagnostic and Statistical Manual of Mental Disorders 5th Edition (DSM-5).

It is not only the rich that have a problem with gambling. I know people with very little money who have the belief that they are going to win. Telling vulnerable people to just say 'no' or having cute adverts telling people to stop is not going 'cut it'.

Gambling has corrupted a lot of men, women and children from low income backgrounds. Bingo is usually played by mainly women so now Croydon Council, our local government, is preventing children from eating, by placing another menace on our high street. Poor and working class mothers will be saying "I am going to use the money for dinner tonight to gamble this last time because "I believe I will win this time". In the end, the children go without food or join county lines. The rest of us left, picking up the pieces through our taxes and our humanitarian contributions towards our communities.

Most of what I said here, you already know. But just like the current government you turn a blind eye. Because it is not your children or your community that is going to suffer.

(c) protecting children and other vulnerable persons from being harmed or exploited by gambling.

An awareness of this growing public health issue could provide an opportunity to ensure public support to tackle gambling-related harms and protect the most vulnerable. In this issue of *The Lancet Public Health*, Heather Wardle and Sally McManus report results from a survey in young adults aged 16-24 years showing an association between gambling behaviour and suicidality (suicidal thoughts and suicide attempts). As Charles Livingsstone and Angela Rintoul note in an accompanying Comment, "In view of these data, it is crucial to improve screening and support services for people with gambling problems, either within primary care or in addiction treatment settings".

[https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(20\)30290-5/fulltext](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(20)30290-5/fulltext)

I trust that Croydon Council will see sense and not grant permission to bring further harm to our community. There is already enough gambling in Croydon and on the London Road, Norbury. We do not need more.

Rep 25.

Review Application for Bingo Premises – Merkur Slots, [1432-4 London Rd, SW16 4BZ](#)

As a local resident, I feel strongly that granting a license will be morally irresponsible. I object on the ground of:

- 1. preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.**

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

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

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. A lot of secondary school students use Norbury High St because of its public transport and shop at the take-aways. Those coming out of Norbury Railway Station to walk to the bus stop on London Rd to travel south will pass the premises. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers – and to the risks of antisocial behaviour linked to betting while en route to school, to Norbury and Norbury Hall Parks and local shops.

We witness begging on Norbury High St. It should not be a place where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue. The situation is becoming worse with the cost of living crisis.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Before COVID the local Councillors and the Residents Associations were working on an action plan that would try and improve and support the high street, making it a more pleasant environment for the community at a time when local high streets like Norbury are facing huge challenges. The local community are keen to see the local day and evening economy thrive. The opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

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It was also concerned about the narrowness of the pavement outside the premises 'making it difficult if not impossible to patrol, as the applicant has suggested they will.'

Rep 26.

I am opposed to the proposed use of the aforementioned building.

And therefore am opposed to the License for that use being granted.

My reasons for this are as follows:

We need to PROTECT the young and vulnerable against harm,

And gambling in slot machines is not only a quick and easy route to addiction and all of its problems for the individuals and their families.

But also can also lead to serious STREET CRIME.

I'm not a N.I.M.B.Y. character, but am genuinely concerned for my neighbourhood and those that live within it.

We are already seriously deprived of any POSITIVE outlets and, or role models for our youths, in NORBURY as it is.

Gambling can be seen as a quick and easy route to alleviate financial poverty, whilst in reality is seriously damaging and can so easily lead to crime and exploitation.

That building would be far better put to use by a company wishing to promote something that influences and encourages POSITIVE attitude, mental good health, and all round wellbeing for our areas Youths.

I thank you for taking the time to both read and hopefully consider my objections.

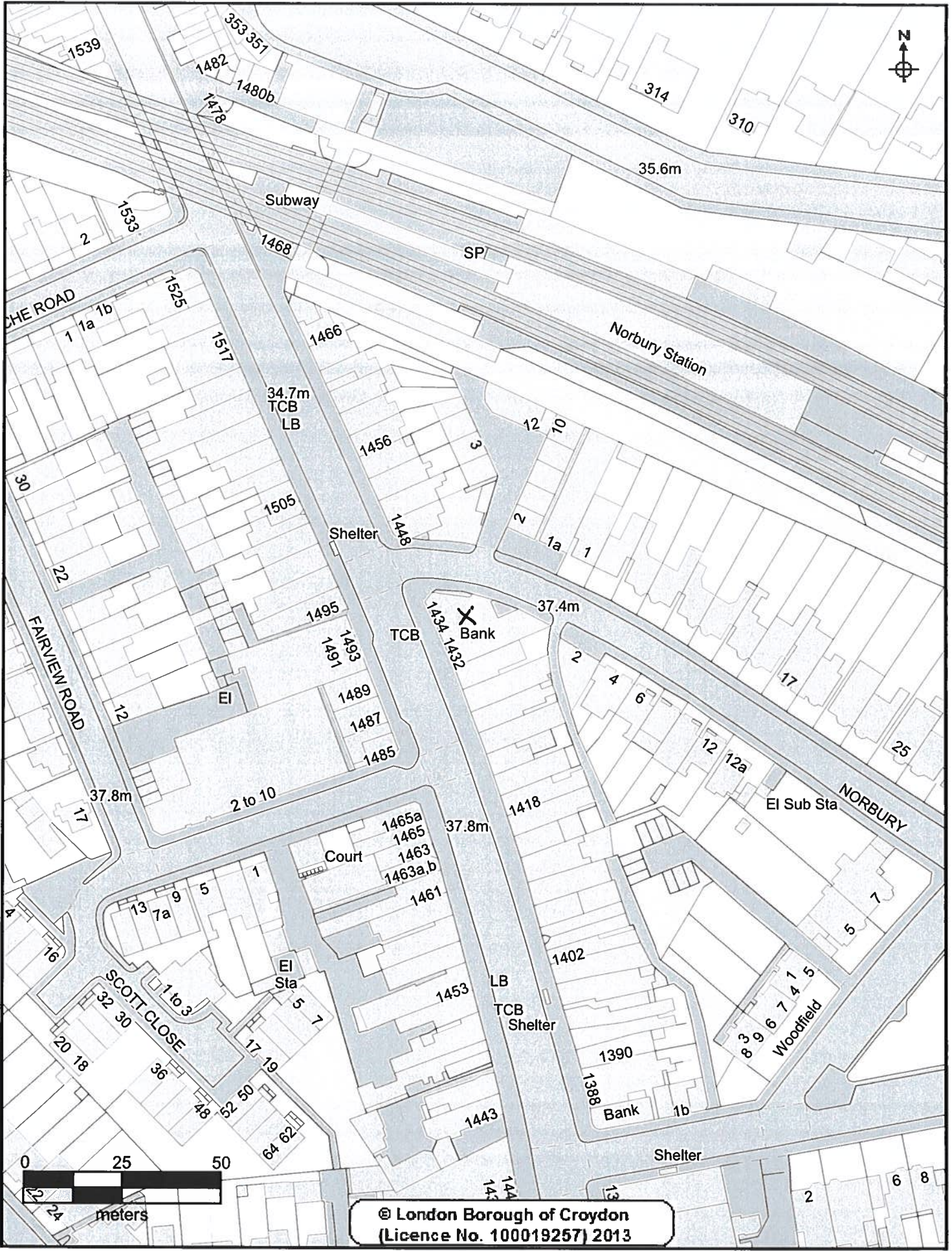
Rep 27.

I'm writing as a Norbury resident to oppose the planning application for the above property.

We all know of the social problems and ills resulting from gambling and the addictive behaviour it causes. We already have more than enough betting offices in the High Street so we don't need more. These places can cause increases in criminality by draining gamblers financially and anti social behaviour especially if they end up staying open much later or possibly

24 hours a day. This is not the sort of development that will help the high street improve with the attempts at regeneration. It's in a prime spot and it should be used to enhance the locality not devalue it. Additionally, as its near the station and there are schools nearby there will be many children passing by and they should be protected from being drawn into gambling.

I really do think that this development would be taking the locality in the wrong direction, its not something that we need and therefore the application should be turned down.



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