

Gambling Policy

Consultation About you / Your organisation

Q1 Are you responding as a resident or as a representative of an organisation?

- Resident: 1,2,3,4,5,7
- Representative of an organisation: 6,8

About you

Q2 Please tell us your name and postal address:

1 – EN1 1EF; 2 – EN3 6SL, 3 – N14 6LR, 4 – N21 3PD, 5 – Not completed, 7 – EN2

Q3 How old are you?

- | | | | | | |
|----------------------------------|------|----------------------------------|----|--|----|
| <input type="checkbox"/> 18 – 24 | 5, | <input type="checkbox"/> 35 - 39 | | <input type="checkbox"/> 50 - 54 | |
| <input type="checkbox"/> 25 – 29 | 1, 7 | <input type="checkbox"/> 40 – 44 | 2, | <input type="checkbox"/> Over 55 | 4, |
| <input type="checkbox"/> 30 – 34 | 3, | <input type="checkbox"/> 45 - 49 | | <input type="checkbox"/> Prefer not to say | |

Q4 Are you male or female?

- Male 3,5, 7
- Female 1,2,4

About your organisation

Q5 Please tell us the name and the address (in Enfield) of the organisation you represent?

6 – Red Card Gambling Support Project Ltd, Edmonton, N9 7HX

8 – William Hill Organization Ltd, 50 Station Road, London, N22 7TP (22 shops in the borough)

In addition, four responses were received by email direct rather than via the website from Coral bookmakers (employs 13,000 across 2,200 shops in the UK), Ladbrokes, the Association of British Bookmakers (ABB – represents over 80% of high street betting market such as William Hill, Ladbrokes, Coral, Paddy Power and almost 100 smaller independents) and Paddy Power (251 betting offices in Ireland and 325 betting offices in the UK). Their responses to the consultation are summarised under the most relevant questions below.

Your views on the Policy

Q6 To what extent do you agree or disagree the Council's approach to the licensing of gambling premises is clear?

- Strongly agree 4, 6,
- Tend to agree
- Neither agree nor disagree 2, 7
- Tend to disagree 1,
- Strongly disagree 5, 8
- Don't know 3,

Q7 Please tell us why you disagree.

Respondent 1 - Enfield council do not push gambling premises to reduce antisocial behaviour or impose more staff be present within shops that have bad antisocial behaviour

LA RESPONSE: Please refer to Section 1.9 of the Policy: the Police and/or the Licensing Authority provide advice to the premises when notified of any incidents. If the incidents at the premises show inadequate improvement, the Police and/or Licensing Authority will take the appropriate enforcement action (which could include review of the licence), in accordance with the council's enforcement policy, Gambling Commission Guidance and the Regulators Code. Bet-Watch Enfield (see paragraph 2.7 of the policy) is also a forum used to discuss any concerns about alleged antisocial behaviour associated with betting shops. The narrative in Figure 14 in Appendix C of the Policy provides a narrative of the reported crime and antisocial behaviour associated with/near betting shops in the last 12 months. **No amendment is needed to the proposed Gambling Act policy.**

Respondent 5 - I couldn't understand it

LA RESPONSE: We accept that the policy deals with matters of a technical nature, and is primarily aimed to inform those operating gambling premises. **No amendment is needed to the proposed Gambling Act policy.**

Q8 To what extent do you think the Council's approach to licensing of gambling premises is fair?

- Strongly agree 4, 6,
- Tend to agree
- Neither agree nor disagree 1, 5,
- Tend to disagree 7,
- Strongly disagree 2, 8,
- Don't know 3,

Q9 Please tell us why you disagree.

Respondent 2 - *Even with a policy there is still far too many gambling establishment in the borough especially in the more deprived areas.*

LA RESPONSE: The Gambling Act states that the Licensing Authority must “aim to permit” gambling that is not a source of crime and disorder, is conducted in a fair and open way and protects children and other vulnerable persons from being harmed or exploited. The guidance to the Act is clear that Licensing Authorities cannot take account of the number of gambling establishments in the borough when determining applications. This guidance is reflected in paragraph 1.7.2 of the Policy. However, the new policy aims to make operators aware of the profile of the borough of Enfield, and Figure 9 in Appendix C provides information on the location of deprived areas to assist gambling operators to take into account local risks when preparing their risk assessment. Gambling Operators are required to share their risk assessment with the Licensing Authority when making a new application or variation application from an existing premises. Overall since 2007, there has been a small increase in the number of betting shops. In 2007 there were 78 licensed betting shops in the borough and currently there are 80. Since 2007, some betting shops have closed and new ones have been licensed. **No amendment is needed to the proposed Gambling Act policy.**

Respondent 7 - *If people want to gamble their money away let them.*

LA RESPONSE: One of the Licensing Objectives to which the council and gambling operators must have regard is the ‘protection of children and other vulnerable persons from being harmed or exploited by gambling. Operators are required to have measures in place to identify and signpost problem gambling. **No amendment is needed to the proposed Gambling Act policy.**

Respondent 8 and ABB’s response –

- *The Licensing Authority should not seek in the Policy to undermine the ‘aim to permit’ principle by imposing burdens/additional hurdles on operators above that outlined in the Act.*
- *Objection to the phrase “invisible and insidious” nature of gambling – as not all gambling is harmful – only problem gambling behaviour. ABB response stated the phrase should be removed*

Ladbroke’s and ABB’s Responses – *Concerned that guidance alters the regime in the Act and increases burdens on already responsible businesses. Considers that the existing guidance and regime, including changes to the planning law, offers adequate protection for communities.*

LA RESPONSE: The Policy has been drafted in accordance with the guidance issued to licensing authorities by the Gambling Commission. The Policy properly acknowledges the ‘aim to permit’ principle, but also embraces the ability permitted in section 153 for the authority to set out the matters it will take into account when making decisions about applications. **The foreword has been amended to make it clear that the “invisible and insidious” nature of gambling refers to problem gambling.**

Paddy Powers’ response - *Paragraph 2.19 suggests that the Authority may require additional information to be contained within premises licensing plans, and only the requirement set out in the Act can be requested.*

LA RESPONSE: Paragraph 2.19 refers to plans of tracks and mostly reflects the guidance issued by the Gambling Commission and will be amended to mirror the recently published final 5th edition of the guidance.

Q10 Do you think the local area profile will assist gambling premises operators prepare their risk assessment?

- Yes 3, 4, 6
- No 1, 2, 7, 8
- Don't know 5,

Q11 Please tell us why you said 'no'

Respondent 1 - Risk assessments that are carried out are not done to correct measures, more in favour of the company to save money, not for the safety of staff and the community

Respondent 2 - They don't care all they care about is profit

LA RESPONSE: The requirement for gambling operators to undertake a risk assessment having regards to the local area is a new requirement that comes in on 6 April 2016. The adequacy of the risk assessment will be considered during applications for new and varied licences, and of course by the Gambling Commission as part of their enforcement/compliance activities. **No amendment is needed to the proposed Gambling Act policy.**

Respondent 7 – Gambling shops have too many constraints

LA RESPONSE: The Gambling Act 2007 and associated guidance sets out the regulation of the gambling industry. **No amendment is needed to the proposed Gambling Act policy.**

- **Respondent 8** – Figures 4-14 are of limited value to operators in assessing gambling related harm
- **ABB's response** – As above. Maps dealing with unemployment and deprivation unhelpful unless authority considers them automatically vulnerable. Crime hotspot maps (figures 13-14) not relevant as to whether betting shops are a source of crime and disorder. Appendix C maps should identify actual pre-deposition to vulnerability to gambling related harm.
- **LA Response:** The figures in Appendix C are provided to 'map' the characteristics of the local area. The respondent has not stated what would be helpful to operators. We will keep the local area profile data under review and consider any feedback provided as to how it could be more useful. All licensing decisions are made in accordance with Section 153 (aim to permit) and the policy. **No amendment is needed to the proposed Gambling Act policy.**
- **ABB's response** – In paragraph 2.4 the policy states will give careful consideration to premises located near schools, youth clubs and other establishments used by children and those who may be vulnerable. The policy should acknowledge that betting shops have been located in such areas for over 50 years and operators have developed policies and procedures to ensure only those able to access them do so.
- **Paddy Powers' response** – the policy should recognise that existing policies and procedures may already address the local area and provide sufficient controls. Careful consideration of premises near schools and other such premises and crime and disorder hotspots should be risk based and evidenced (not theoretical risks).
- **LA RESPONSE:** Paragraph 2.4.4 already makes it clear that this does not preclude any application, each case decided on its merits and that the applicant should demonstrate how potential concerns will be addressed. **Paragraph 2.4.4 of the policy will be amended to emphasise that operators are encouraged to provide information in their application that demonstrates they have existing policies and procedures to mitigate any risks.**
- **Paddy Power's response** – As a regulator, the authority should take an evidence based approach in accordance with the Regulators' Code towards the local area profile and risk assessment. Operators should be allowed to assess their existing processes. Identification of theoretical risk factors (paragraph 6.2) such as area demographics, ethnicity, proximity to other premises (including medical centres and places of worship), trends relating to benefit payments and deprivation should only be included where local evidence is available, which quantifies the ascertainable risk to be mitigated.

Q12

If there is any further information the Council should provide for the local area profile, let us know.

***Respondent 4** - Proximity of betting shops to bus stops that serve schools*

LA RESPONSE: A map showing the locations of bus stops was prepared, but it does not show those bus stops that serve schools so was not included. **No amendment is needed to the proposed Gambling Act policy.**

***Respondent 6** - there has to figures of unemployment and homelessness, as well as crime figures as we know that gambling has a huge affect on other social issues such as the for mentioned. There is clear evidence that the number of young adults indulging in gambling are increasing in our boroughs and cities so the council need to look at what support there is out there for those suffering and for those more vulnerable and at risk. We want to help as an organisation that offer support,advice,treatment.*

LA RESPONSE: Figures 10 in Appendix C show the numbers of persons claiming job seekers allowance (JSA) as an indication of unemployment. We do not hold any data for unemployed persons not claiming JSA. We do not have homelessness data represented on a borough map. We will contact Red Card Gambling Support Project Ltd to explore how their service can be promoted and accessed. **No amendment is needed to the proposed Gambling Act policy.**

Q13 If you have any suggestions for amending the Policy, let us know.

Respondent 1 - *Compulsory double manning gambling premises at night where there has been at least three instances where police or local community officers have attended within 6 months. Make Betwatch meetings for licence holders within community compulsory.*

LA RESPONSE: If gambling premises are shown to have a pattern of crime associated with them then the licence can be reviewed and measures appropriate to the issues; which might include increased staffing, would be sought through additional conditions to the licence. The Licensing Authority cannot require Betwatch meetings to be compulsory. **No amendment is needed to the proposed Gambling Act policy.**

Respondent 6 - *find suitable local gambling support avenues for problem gamblers.*

LA RESPONSE: All gambling premises are required under the Social responsibility code provision 3.3.1, must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling and well as having other measures in place. **No amendment is needed to the proposed Gambling Act policy.**

Respondent 8 and Paddy Powers' response –*summarised below:*

- *Amend foreword to reference the desirability of licensed and regulated supply over illegal supply of gambling*
- *Make reference to the significant level of regulation under the operating licence and Licensing Conditions and Codes of Practice to which operators have to adhere and obtain an operators licence from the Gambling Commission before a premises licence*
- **LA RESPONSE:** Paragraph 1.9.5 of the policy is amended to state that we will also target enforcement towards illegal gambling as it is potentially higher risk/harm due to the lack of regulation and oversight that legitimate licensed gambling is subject to. Paragraph 2.1.2 has been amended to reflect the fact that applicants for premises licence have been subject to the operating licence and Licensing Conditions and Codes of Practice before applying.
- **Respondent 8 and ABB's response** - *In paragraph 1.7.2, the Authority cannot circumvent the law by considering the number of premises (cumulative impact) where there is a risk to the licensing objectives as only the risk posed by the particular premises can be considered*
- **LA RESPONSE:** Paragraph 1.7.2 has been amended as it was not clear that it meant that an application for a licence is assessed on its impact in the locality.
- *In paragraph 1.7.4, the authority cannot widen the definition of those with “business interests”. It is clear that there is a second category for “interested parties”. The definition should be given its normal meaning.*
- **LA RESPONSE:** The 5th edition of the guidance to Licensing Authorities states such groups could be considered to be interested parties or having business interests. **Paragraph 1.7.4 of the policy has been ‘qualified’ to make it clear that when considering ‘business interests’ in the widest context that this will be in accordance with the criteria in paragraph 1.7.3.**

- *In paragraphs 1.11 and 1.12, wider strategies should not be included if not relevant to the licensing objectives and not be used to hide exclusionary policies relating to betting shops*
- **Ladbroke's response** – *Paragraph 1.11 refers to strategies that may not have direct impact on the licensing objectives, but may indirectly impact on them and then goes onto to say conditions will only be attached where reasonable and proportionate to be consistent with the licensing objectives. Council needs to apply the agreed licensing objectives and not seek to extend them to other factors.*
- **LA RESPONSE: The section about wider strategies has been removed in the final version of the 5th edition of guidance to local authorities so will be deleted from our policy.**
- *In paragraph 1.13, the Authority has failed to use the latest data from the English and Scottish health surveys (separate and combined). Also there has been selective use of data and quotes aimed at stigmatising “FOBTs” and betting shops generally. This betrays an element of bias in the policy which would be unlawful.*
- **Ladbroke's response** – *Comments made in relation to the 2010 Gambling Prevalence Study – no significant rise in problem gambling despite increased participation (and most recent survey suggesting it has remained static) and problem gambling levels remain low.*
- **ABB's response** – *Later health surveys ignored, which found that gambling is not rising and problem gambling is static and perhaps falling. This section should be removed as it does not assist the local authority with its ‘aim to permit’ principle in the Gambling Act*
- **Paddy Powers' response** – *cannot see the relevance of this information in paragraph 1.13 and should be removed.*
- **LA RESPONSE: Paragraph 1.13 has been amended to reflect the executive summary of the ‘Findings from the Health Survey for England 2012 and Scottish Health Survey 2012’ and a weblink to the full report. It has not been removed as it provides information on gambling prevalence and behaviours.**
- *In paragraph 2.4.2, the authority can have ‘special consideration’ to risk controls where there is evidence that premises could be accessed by children and vulnerable persons but cannot have a general exclusion policy in a location due to theoretical risk*
- **LA RESPONSE:** paragraphs 2.4.4 – 2.4.6 make it clear that each application is considered on its merits, that the risk assessment undertaken by the operator based on location will be considered and the Authority will consider any other measures it considers necessary to mitigate the risk. **The Policy will be amended in paragraph 2.4.5 to emphasise that the risk assessment undertaken and controls identified by the operator will be considered.**
- *In paragraph 2.4.3, cannot see relevance of maps showing social deprivation as betting shops cater for demand in areas of high density/footfall. Cannot understand what further controls could be put in place to further reduce gambling related harm in deprived areas. Location of schools and youth centres is irrelevant if the operator has age restriction controls.*
- **LA RESPONSE:** The 5th edition guidance issued by the Gambling Commission to Licensing Authorities permits licensing authorities to provide a local area profile in their policy to ‘map out’ the key characteristics of the local area. The purpose of the maps in Appendix C is to provide operators with information pertaining to the characteristics of the local area to assist them when undertaking their own risk assessments and identifying risk controls.

- **ABB's response** – *Important that any risk identified in the local area profile are supported by substantive evidence and not perceived risks. Otherwise this would be disproportionate and distort the 'aim to permit' principle by reverse the burden of proof from the local authority to prove the risks to the operator to mitigate potential risks.*
- **LA RESPONSE:** Appendix C is provided to 'map' the characteristics of the local area. All licensing decisions are made in accordance with Section 153 of the Act ('aim to permit' principle) and the policy. **No amendment is needed to the proposed Gambling Act policy.**

If you have any other comments you would like to make, let us know.

Respondent 8 – summarised below:

- *Betting shops are not a significant societal issue or public health concern; albeit a serious issue for a minority*
- **LA RESPONSE:** Comments noted. **No further amendments needed to the policy.** The ‘Findings from the Health Survey for England 2012 and Scottish Health Survey 2012’ referenced in 1.13 of the policy reports research into the prevalence of gambling, use of different means of gambling and data/risks in relation to problem gambling
- *The Authority cannot simply provide a list of theoretical risks related to gambling harm. The risks have to be real, evidenced and apparent.*
- **LA RESPONSE:** The policy throughout makes it clear that decisions on applications will be made in accordance with Section 153 of the Act and the Licensing Authority’s statement of policy, and that decisions will be evidence based and each application considered on its own merits. **No amendments needed to the policy.**
- *We accept that the Authority has enforcement responsibilities, but again when making reference to enforcement, there should be consistency with the principles of better regulation and good enforcement; with intervention being at the lowest level to achieve the desired outcome*
- **LA RESPONSE:** Paragraph 1.9 of the policy references the Regulators’ Code and the Council’s Enforcement Policy which provides more detail of application by the Council of the principles in the Regulators’ Code. **No amendments needed to the policy.**
- *There will be more references to problem gambling organisations from the betting sector because it constitutes some 70% of the commercial gambling industry. Also there are processes in place for sign posting. Rising referral numbers are in fact an indication of enhanced responsible gambling processes within betting shops. This exposition contains little balance. Problem gambling levels are stable and possibly falling (certainly not rising).*
- **LA RESPONSE:** Comments noted. **No further amendments needed to the policy.** The ‘Findings from the Health Survey for England 2012 and Scottish Health Survey 2012’ referenced in 1.13 of the policy reports research into the prevalence of gambling, use of different means of gambling and data/risks in relation to problem gambling.
- *In part 2.6, the policy does not make clear distinction between nuisance and disorder – narrative provided.*
- **ABB’s response** – *In paragraph 1.7.2, should include nuisance in the list as not being a valid reason to reject an application*
- **LA RESPONSE:** The narrative provided by the respondent in relation to paragraph 2.6 does not seem to reflect the content of the policy at this part. Paragraph 2.6.2 makes it clear that ‘issues of nuisance cannot be addressed via the Gambling Act provision’. **No amendments needed to the policy.**
- *In paragraph 2.9.1, door supervisors are not an effective control in betting shops as staff watch the door and door supervisors cannot police the street.*
- **LA RESPONSE: No amendments needed to the policy**

- *In section 6.2 and Appendix G (Risk Assessment template), the template is unsuitable and complex. Will be adapting own existing risk assessment process.*
- **Ladbroke's response** – *Concerned about the over-prescription of the risk assessment in the policy (Appendix G) as they undertake their own risk assessments and encourage the council to allow operators to complete the assessment in line with their own practices*
- **ABB's response and Paddy Powers' response** – *Do not believe it is for the licensing authority to prescribe the form of the risk assessment. Operators should be allowed to use their own risk assessments.*
- **LA RESPONSE: The policy will be amended at 6.5.2 to make it clear that the template is provided for use or reference as to the types of matters it expects the operator to have considered, but operators can use their own risk assessment.**
- *In paragraph 6.2.3, refute that need to provide the sort of information listed as deemed unreasonable, disproportionate and ultravires. Considers having to provide granular detail to each local authority is against better regulation principles and will approach the Better Regulation Delivery Office. Considers that provision of gaming trends in relation to benefit payment days are irrelevant as is the proximity of betting shops to refreshment and entertainment facilities. Consider that the list is prescriptive and of theoretical risk not evidence as being legitimate risk factors to gambling harm. Requests that this approach is reconsidered otherwise will consider challenging the policy.*
- **Ladbroke's response** – *Concerned that the elements of a risk assessment of the local area to be considered (eg proximity to schools, gaming trends that reflect benefit payments, street drinking, increased footfall) are suggested risks and not evidence based and fails to acknowledge existing policies operator has in place to manage local changes. Do not accept that proximity of young people to a betting shops poses a local risk and already have age identification measures in place.*
- **ABB's response** – *local area risk assessments are required from 6 April 2016. Paragraphs 6.2.3, 6.3.3 and 6.3.4 contain criteria that should be considered in the local area risk assessment that cannot be relevant. It is for the authority to identify matters that are relevant to the licensing objectives. Paragraph 6.2.3 should be removed and replaced by the statement at 6.2.4.*
- **LA RESPONSE: The Licence Conditions and Codes of Practice (February 2015) states (albeit from April 2016) licensees should share their risk assessment with the licensing authority when applying for a new licence or to vary a licence, or otherwise on request. Further, it states that in making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy. The 5th edition Guidance to Licensing Authorities states that the Council's statement of policy should set out the factors it is likely to take account of when considering applications, may take account of the local area profile and will include considerations such as proximity of gambling premises to schools and vulnerable adult centres. **The Policy is amended to acknowledge that operators may have existing measures in place to deal with the matters identified in the local area. Paragraph 6.2.1 of the policy is amended to emphasise further to para 6.1.2 that the requirement to produce risk assessments comes in on 6 April 2016. Paragraphs 6.2.3, 6.3.3 and 6.3.4 are amended to make it clear that the lists are examples of matters that should be considered.****
- **ABB's response** – *Paragraph 6.6.3 should be removed as the terms 'sensitive' building' and 'vulnerable community' are not defined in the Act or policy, specifying within 400 metres is arbitrary and in any case is unnecessary as operators will have considered sensitive premises or vulnerable persons in their risk assessment.*
- **LA RESPONSE: The authority considers that is a relevant matter to ensure that the operator has had regard to the local area within approx. 5 minutes walk (approx. 400 metres) , but para 6.6.3 is amended to make it clear that operators are encouraged to ensure that premises/locations where children, young persons and vulnerable are/resort within 400m are considered.**

- In paragraph 6.6.4, it states that as there have been no complaints or age restricted sales that this must show it is low risk as betting shops are already located in areas of children and young persons.
- **LA RESPONSE:** This does not in itself show there is low risk. The test purchases conducted have been few in number and only test at that point in time.
- *In figure 14 (crime hotspots), statements provided about limited evidence of drug, notifiable crime and the recording of CAD data and that crime has to be shown to be associated with gambling premises to be a risk to the licensing objectives.*
- **LA RESPONSE: The narrative accompanying Figure 14 provides appropriate context of crime data in relation to betting shops and so no amendment to the policy is required.**
- *The sample conditions in Appendix D should be removed as they are unworkable and seek to extend over and above the mandatory and default conditions.*
- **Ladbroke's Response** – *Concerned that the pool of conditions are prescriptive and go beyond that which was agreed by the Regulator*
- **ABB's Response** – *Additional conditions should only be imposed in exceptional circumstances where there are clear reasons for doing so. Paragraph 2.8 should be amended to acknowledge that premises are already subject to mandatory and default conditions and additional conditions should only be added if these need supplementing.*
- **Paddy Powers' response** – *Existing mandatory and default conditions are already imposed, so additional conditions to (new and) variations of existing licences should only be added where there is clear evidence of risk and existing measures are insufficient. Use of a pool of conditions will encourage their use rather than case by case basis.*
- **LA RESPONSE:** These conditions emanate from the draft 5th edition guidance to Licensing Authorities from the Gambling Commission that was placed on consultation March- 22 June 2015. The pool of conditions has been removed from the final version of the 5th edition guidance by the Gambling Commission published in September 2015 and placed instead on their website to make them easier to update. **The pool of conditions are provided as examples for use should they be needed, and will now be referenced by a link to the Gambling Commission's website rather than appended to this policy.** The policy is clear (paras 2.8.2 and 2.8.4) that additional conditions are only imposed if the Licensing Authority consider they are needed to mitigate risk to the licensing objectives and considered on a case by case basis, but a new **paragraph 2.8.1 will be added to make this even clearer.**

Respondent 2 - *Stop approving licenses for so many betting shops*

LA RESPONSE: The Gambling Act states that the Licensing Authority must “aim to permit” gambling that is not a source of crime and disorder, is conducted in a fair and open way and protects children and other vulnerable persons from being harmed or exploited. There is a presumption in the Act therefore in favour of licensing betting shops unless the Council considers that these objectives cannot be met and so the licence application would be refused.

Respondent 6 - *As an Enfield /Edmonton resident i would like to do something in my community with regards to helping young adults steer clear of GAMBLING. Also the council definitely need to identify where the most vulnerable and at risk young adults are and how they can be supported. Gambling figures are rising in Enfield so the council need to sought help from outside agencies if need be, as EDUCATION/AWARENESS is the key.*

LA RESPONSE: Identifying individuals that are the vulnerable to gambling harm is difficult. Gambling operators have duties to identify customers and signpost them to help for problem gambling. Recently published research¹ has identified *groups* of persons who may be vulnerable to gambling-related harm, which includes children and young people. The local area profile we have developed in Appendix C seeks to identify locations and places vulnerable persons may be. **No amendment is needed to the proposed Gambling Act policy.**

Ladbroke's response – concerned that council intends to apply policies that are not evidence based such as in paragraph 6.4 which states “in assessing the risk factors associated with a gambling operation the assessor should take into account the local risks which are commonly accepted by broader stakeholders and how that gambling operation may affect that risk” Whilst it is not clear who the document refers to when it mentions ‘stakeholders’, this is a potentially worrying development as there are a variety of myths in the public domain around gambling habits and trends. We would therefore encourage the Council to only to accept risks which can be substantiated with robust evidence.

LA RESPONSE: Paragraph 6.4 is be amended to remove reference to stakeholder perceptions.

Ladbroke's response – Already operate robust age restrictions and design premises to mitigate risk (examples were given).

LA RESPONSE: Comments noted. **No amendment to the policy needed.**

ABB's response – recent media coverage has suggested that there has been a proliferation in betting shops. The numbers have remained relatively stable (figures provided for UK). Problem gambling rates in the UK are stable (0.6%) and possibly falling.

LA RESPONSE: Comments noted. **Information from recent surveys on problem gambling has been updated in paragraph 1.13 of the policy.**

ABB's response – Examples provided of working in partnership with local authorities.

LA RESPONSE: Comments noted. **No amendment to the policy is needed.**

ABB's response – Foreword of the policy recognises that gambling is a legitimate leisure industry but the rest of the policy appears to view it as not a legitimate industry and ones that requires heavy regulation.

LA RESPONSE: The policy has been prepared in accordance with the guidance issued by the Gambling Commission and states the matters the authority will take into account when making decisions on applications. **No amendment to the policy is needed.**

¹ 'Exploring area-based vulnerability to gambling-related harm: Who is Vulnerable? Findings from a quick scoping review' by Heather Wardle (Gambling and Place Research Hub – Geofutures) 13 July 2015

ABB's response – *In paragraph 1.16 it refers to the promotion' of the licensing objectives, whereas the licensing authority must only 'have regard' to the licensing objectives.*

LA RESPONSE: Paragraph 1.16 has been amended accordingly.

Paddy Powers' response - *Requests for information of a commercial or sensitive nature (such as in paragraph 6.4) are not necessary for the authority to consider the application.*

LA RESPONSE: Paragraph 6.4.1 is clear that the operators may want to consider providing such information. (This is to assist the authority in determining the application). **No amendments needed to the Policy.**