

# Licensing Sub-Committee Agenda



To: Councillors Chris Clark, Niroshan Sirisena and Robert Ward

The pre-meeting will be held in Room F4, Town Hall at 10am.

A meeting of the **Licensing Sub-Committee** which you are hereby summoned to attend, will be held on **Thursday, 9 May 2019** at **10.30 am** in **Room F10, Town Hall, Katharine Street, Croydon CR0 1NX**

JACQUELINE HARRIS BAKER  
Council Solicitor and Monitoring Officer  
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Tuesday, 30 April 2019

Members of the public are welcome to attend this meeting.  
If you require any assistance, please contact the person detailed above, on the righthand side.

N.B This meeting will be paperless. The agenda can be accessed online at [www.croydon.gov.uk/meetings](http://www.croydon.gov.uk/meetings)

## **AGENDA – PART A**

**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**

In accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, Members and co-opted Members of the Council are reminded that it is a requirement to register disclosable pecuniary interests (DPIs) and gifts and hospitality to the value of which exceeds £50 or multiple gifts and/or instances of hospitality with a cumulative value of £50 or more when received from a single donor within a rolling twelve month period. In addition, Members and co-opted Members are reminded that unless their disclosable pecuniary interest is registered on the register of interests or is the subject of a pending notification to the Monitoring Officer, they are required to disclose those disclosable pecuniary interests at the meeting. This should be done by completing the Disclosure of Interest form and handing it to the Democratic Services representative at the start of the meeting. The Chair will then invite Members to make their disclosure orally at the commencement of Agenda item 3. Completed disclosure forms will be provided to the Monitoring Officer for inclusion on the Register of Members' Interests.

**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 Premises Licence - Adult Gaming Centre (Pages 5 - 80)**

**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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<b>REPORT TO:</b>	<b>LICENSING SUB COMMITTEE</b> <b>Thursday 9 May 2019</b>
<b>AGENDA ITEM:</b>	
<b>SUBJECT:</b>	<b>GAMBLING ACT 2005 – APPLICATION FOR PREMISES LICENCE – ADULT GAMING CENTRE</b>
<b>LEAD OFFICER:</b>	<b>Executive Director, Place Department</b>
<b>CABINET MEMBER:</b>	<b>Councillor Hamida Ali, Cabinet Member for Safer Croydon &amp; Communities</b>
<b>WARDS:</b>	<b>Thornton Heath</b>
<b>CORPORATE PRIORITY/POLICY CONTEXT:</b>	
<b>This report is specific to this application and has no implications on the Council’s Corporate Policies.</b>	
<b>FINANCIAL SUMMARY:</b>	
<b>This application is being processed as part of normal duties carried out by the Department with no additional costs involved.</b>	
<b>FORWARD PLAN KEY DECISION REFERENCE NO.: N/A</b>	

**For general release**

<b>1.</b>	<b>RECOMMENDATIONS</b>
1.1	The Sub-Committee is asked to determine whether to grant the application for an Adult Gaming Centre Premises Licence at 91 High Street, Thornton Heath, CR7 8RY.

**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, (Adult Gaming Centre) under the Gambling Act 2005 (“the Act”). The application has drawn representations from a responsible authority and 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 Sue Moorman, HR Director, 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.

## **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, Licensing Manager, Place  
Department, ext. 61838

**BACKGROUND DOCUMENTS:** Application Forms  
Licensing Hearings Protocol and Procedure



**1. The Application**

- 1.1 This report concerns an application made under section 159 of the Gambling Act 2005 (the Act) by Luxury Leisure for a Premises Licence (Adult Gaming Centre) at 91 High Street, Thornton Heath, CR7 8RY.
- 1.2 An application for a premises licence may only be made by a person who:
- Holds an operating licence which authorises him to carry on the activity in respect of which the premises licence is sought and
  - Who has a right to occupy the premises to which the application relates.
- 1.3 An Adult Gaming Centre (AGC) premises licence authorises a premises to be used for making available Category B, C and D gaming machines. An AGC premises licence may make 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 Taken from the Gambling Commission Guidance to Local Authorities, attached at Appendix A1 is the Summary of Machine Provisions by premises.
- 1.5 Attached at Appendix A2 is the Summary of Gaming Machine Categories and Entitlements.
- 1.6 Attached at Appendix A3 is Part 9 from the Gambling Commission Guidance to Local Authorities which concerns Premises Licence conditions.
- 1.7 Attached at Appendix A4 is Part 21 from the Gambling Commission Guidance to Local Authorities which concerns Adult Gaming Centres and this also includes the Mandatory conditions that would automatically be attached to an Adult Gaming Centre Premises Licence, if granted. Some types of gambling premises licence also have default conditions attached to them but there are currently no default conditions specific to Adult Gaming Centres.
- 1.8 Attached at Appendix A5 is a copy of the application for the premises licence and accompanying documentation that the applicant submitted with their application.
- 1.9 Attached at Appendix A6 is a copy of the Local Area Profile which was produced and is made reference to by the applicant in their risk assessment.

**2. Relevant representations**

- 2.1 A responsible authority (the Police) & interested parties have made representations on this application and copies are attached at Appendix A7.
- 2.2 An interested party is defined in the Gambling Act 2005 as someone who –

- lives sufficiently close to the premises to be likely to be affected by the authorised activities
  - has business interests that might be affected by the authorised activities
  - represents persons in either of these two groups.
- 2.3 The applicant has been provided with a copy of the representations made and both the applicant and those making representations have been made aware of the date, time and location of the Sub Committee hearing.

### **3. Policy Considerations**

- 3.1 Under the terms of the Act, the Council has published a Statement of Principles. This is available on the Council website at [www.croydon.gov.uk](http://www.croydon.gov.uk) . Hard copies are also available from the Council's Place 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 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), which were revised and published in April 2018, formalise the need for operators to consider local risks.*

*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 Principles.*

*This Council expects all operators, especially when making new premises licence applications or, when applying to vary the terms of an existing premises licence, if there are significant changes in local circumstances and when there are significant changes at a licensee's premises that may affect their mitigation of local risks, 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. 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 or who are homeless 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 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.

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

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

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. 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 and of the advice to local authorities from the Local Government Association in their document entitled 'Tackling gambling related harm – A whole Council approach' dated July 2018.

The Council is also aware of the British Beer & Pub Association (BBPA) Code of Practice concerning the social use of gaming machines in pubs, clubs and amusement arcades to protect the interests of children and vulnerable people. The BBPA code requires that all gaming machines in pubs, clubs and arcades shall:

- display the GamCare helpline number
- have clear signage forbidding play by under 18's and
- be supervised to ensure that there is no underage play.

*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.*

*The Government has issued regulations that set out the categories of gaming machines, with the maximum stakes and prizes that apply, and these can be found via the following link:*

[http://www.legislation.gov.uk/ukxi/2007/2158/pdfs/ukxi\\_20072158\\_en.pdf](http://www.legislation.gov.uk/ukxi/2007/2158/pdfs/ukxi_20072158_en.pdf)

*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. 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.*

## **2. Adult Gaming Centres**

*The Council will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to, for example, ensure that under 18 year olds do not have access to the premises.*

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

- *Proof of age schemes*
- *CCTV*
- *Supervision of entrances / machine areas*
- *Physical separation of areas*
- *Location of entry*
- *Notices / signage*
- *Specific opening hours*
  - *Self-exclusion schemes*
  - *Provision of information leaflets / helpline numbers for organisations such as GamCare.*

*This list is not mandatory, nor exhaustive, and is merely indicative of example measures.*

## **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.*

*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/ evoke/suspend the 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.*

3.2 An ordnance survey extract map is attached at Appendix A8 showing the location of the premises.



## 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)					
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)					
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					
Betting premises and tracks occupied by pool betting		Maximum of 4 machines categories B2 to D (except B3A machines)					
Bingo premises <sup>1</sup>				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 <sup>2</sup>				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 <sup>3</sup>						No limit on category C or D machines	
Family entertainment centre (with permit) <sup>3</sup>						No limit on category D machines	
Clubs or miners' welfare institute (with permits) <sup>4</sup>				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			
Qualifying alcohol-licensed premises (with licensed premises gaming machine permit)			Number of category C-D machines as specified on permit				
Travelling fair			No limit on category D machines				

<sup>1</sup>Bingo premises licence are entitled to make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines on the premises. Where a premises licence was granted before 13 July 2011, they are entitled to make available eight<sup>104</sup> category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. Category B machines at bingo premises are restricted to sub-category B3 and B4 machines, but not B3A machines.

<sup>2</sup> Adult gaming centres are entitled to make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines which are available for use on the premises and any number of category C or D machines. Where a premises licence was granted before 13 July 2011, they are entitled to make available four category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. Category B machines at adult gaming centres are restricted to sub-category B3 and B4 machines, but not B3A machines.

<sup>104</sup> The Gambling Act 2005 (Gaming Machines in Bingo Premises) Order 2009

<sup>3</sup> Only premises that are wholly or mainly used for making gaming machines available may hold an unlicensed FEC gaming machine permit or an FEC premises licence. Category C machines may only be sited within licensed FEC's and where an FEC permit is in force. They must be in a separate area to ensure the segregation and supervision of machines that may only be played by adults. There is no power for the licensing authority to set a limit on the number of machines under the FEC permit.

<sup>4</sup> Members' clubs and miners' welfare institutes with a club gaming permit or with a club machine permit, are entitled to site a total of three machines in categories B3A to D but only one B3A machine can be sited as part of this entitlement.

<sup>5</sup> Commercial clubs with club machine or gaming permits are entitled to a total of three machines in categories B4 to D.

## Appendix B: Summary of gaming machine categories and entitlements

Category of machine	Maximum stake (from Jan 2014)	Maximum prize (from Jan 2014)
A	Unlimited – No category A gaming machines are currently permitted	
B1	£5	£10,000*
B2	£100	£500
B3A	£2	£500
B3	£2	£500
B4	£2	£400
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)

\* With option of max £20,000 linked progressive jackpot on premises basis only

## Part 9: Premises licence conditions

- 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.

#### 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.
- 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<sup>21</sup>.
- 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 (PSIA) to hold a licence, s. 178 of the Gambling Act 2005 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.
- 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'.

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<sup>21</sup> Part 1(5) of The Gambling Act 2005 (Mandatory and Default Conditions) Regulations

**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. In the case of horse racing, pool betting can only be made available at racetracks by Betfred following their purchase of the Tote. As part of the sale process Betfred received an exclusive seven year licence (until July 2018) to operate pool betting operations on UK racecourses.

**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.

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 licence					X				
Casino premises licence		X		X	X				
Small casinos			X						
Large casinos			X						
Betting premises licence		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 and the Gambling Act 2005 (Mandatory and Default Conditions) (Scotland) Regulations 2007.<sup>22</sup>

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.

<sup>22</sup> SI 2007/1409: Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007  
SSI 2007/266: Gambling Act 2005 (Mandatory and Default Conditions)(Scotland) Regulations 2007

- 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 17-22 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 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 17-22 of this Guidance.

### **Mandatory conditions**

- 9.25 The following mandatory conditions apply to all premises licences:
- the summary of the terms and conditions of the premises licence issued by the licensing authority must be displayed in a prominent place on the premises
  - the layout of the premises must be maintained in accordance with the plan that forms part of the premises licence
  - neither National Lottery products nor tickets in a private or customer lottery may be sold on the premises.
- 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 or 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 21: Adult gaming centres

- 21.1 Persons operating an adult gaming centre (AGC) must hold a 'gaming machines general operating licence (adult gaming centre)' from the Commission and a premises licence from the relevant licensing authority. They are able to make category B, C and D gaming machines available.

### Protection of children and young persons

- 21.2 No-one under the age of 18 is permitted to enter an AGC. The Act sets out offences at s.46 and s.47 of inviting, causing or permitting a child or young person to gamble, or to enter certain gambling premises. In addition, Social Responsibility (SR) code 3.2.3(3) in the *Licence Conditions and Codes of Practice* (LCCP) 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.
- 21.3 Licensing authorities will wish to have particular regard to the location of and entry to AGCs to minimise the opportunities for under-18s to gain access. This may be of particular importance in areas where young people may be unsupervised for example, where an AGC is in a complex, such as a shopping centre or airport. Licensing authorities should consider whether their statement of policy can be used to reflect such locally based considerations.

### Gaming machines

- 21.4 Gaming machine provisions by premises are set out at Appendix A. S.172(1) of the Act, as amended, provides that the holder of an AGC premises licence may make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines which are available for use on the premises and any number of category C or D machines. 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 those premises.
- 21.5 Premises subject to a licence granted before 13 July 2011 are entitled to make available four category B3/B4 gaming machines, or 20% of the total number of gaming machines, whichever is the greater. AGC premises licences granted on or after 13 July 2011 are entitled to 20% of the total number of gaming machines only. Regulations specify that the category B machines should be restricted to sub-category B3 and B4 machines, but not B3A machines<sup>66</sup>.
- 21.6 Where the operator of an existing AGC premises licence applies to vary the licence and acquire additional AGC premises licences – so that the area that was the subject of a single licence will become divided between a number of separate licensed premises – each separate licensed premises must only contain the permitted machine entitlement. For example, where two separate AGC premises have been created adjacent to each other by splitting a pre-existing premises, it is not permissible to locate eight category B3 gaming machines in one of the resulting premises and none in the other, as the gaming machine entitlement for that premises would be exceeded. Part 7 explains in greater detail what constitutes premises.

### AGC premises licence conditions

- 21.7 Part 9 of this Guidance discusses the mandatory and default conditions that attach to premises licences. Currently there are no default conditions specific to AGCs.

<sup>66</sup> S1 2158 The Categories of Gaming Machine Regulations 2007



**Mandatory conditions**

- 21.8 A notice must be displayed at all entrances to AGCs stating that no person under the age of 18 years will be admitted to the premises.
- 21.9 There can be no direct access between an AGC and any other premises licensed under the Act or premises with a family entertainment centre (FEC), club gaming, club machine or alcohol licensed premises gaming machine permit. There is no definition of 'direct access' in the Act or regulations, although licensing authorities may consider that there should be an area separating the premises concerned, such as a street or cafe, which the public go to for purposes other than gambling, for there to be no direct access.
- 21.10 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 at any gaming machine in order to do so.
- 21.11 The consumption of alcohol in AGCs is prohibited at any time during which facilities for gambling are being provided on the premises. A notice stating this should be displayed in a prominent place at every entrance to the premises.

15<sup>th</sup> February 2019

Croydon Council  
Licensing Team  
6th Floor  
Zone A  
Bernard Weatherill House  
8 Mint Walk  
Croydon  
CR0 1EA

Our Ref: EJS/TCR/New AGC

By e-mail only:-  
[LICENSING@croydon.gov.uk](mailto:LICENSING@croydon.gov.uk)  
cc: [Michael.Goddard@croydon.gov.uk](mailto:Michael.Goddard@croydon.gov.uk)

Dear Sirs

**Re: Gambling Act 2005  
Application for an Adult Gaming Centre Premises Licence for  
Admiral, 91 High Street, Thornton Heath, CR7 8RY  
Applicant – Luxury Leisure**

On behalf of Luxury Leisure, I enclose an application for an adult gaming centre (AGC) premises licence for the above site (the "Premises") under the Gambling Act 2005 ("the Act").

As you know, Luxury Leisure has held an operating licence (reference 1876) since the Act came into effect in 2007. Together with its sister companies SAL Leisure Limited and Talarius Limited, Luxury Leisure is the largest operator of AGCs in the UK and is part of the Novomatic global group of businesses.

We have for many years operated an AGC at Admiral, 71 North End, Croydon, CR0 1TJ and have a long record of effective and responsible management throughout Great Britain. We are founder members of the national trade association BACTA (where I am currently the Chairman of the AGC division) and of its Social Responsibility Committee and have a good relationship with GambleAware to whom we make substantial contributions towards research, education and the treatment of gambling related harm. We place a high premium on excellent staff training which is refreshed regularly and the grant to Luxury Leisure of its operating licence evidences the Gambling Commission's satisfaction with its integrity, competence, finances and operating model. All required personal management licences are in place and maintained centrally.

As with all of our sites, the operation of the Premises will be fully compliant with applicable legislation, including compliance with the relevant Mandatory and Default Conditions set out in the Gambling Act 2005 (Mandatory and Default Conditions (England and Wales)) Regulations 2007.

Our operations at the Premises will reinforce the licensing objectives and in particular in the following ways:-

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
  - a) A Local Risk Assessment (enclosed) has been prepared for the site using both local knowledge and a third party mapping tool as well as information provided by the licensing authority. This will be reviewed regularly and updated accordingly to reflect any changes.
  - b) As with our 71 North End Croydon site, the Premises will have a fully up to date CCTV system with records kept for an appropriate length of time and signage to indicate the presence of the system. I refer you to the details of the local risk assessment.
  - c) All of our staff will be provided with local and emergency contact details for emergency services and these will be displayed clearly in the office areas of the Premises.
  - d) We will consult with any crime reduction officer within the local police team and the local police licensing team as part of this application. Going forward, we will engage with them and hold security reviews with them should that assist them.
  - e) We provide a safe system for payment of winnings. The majority of the machines in the Premises will be "ticket in ticket out" (TITO), which is a system that gives tickets on winning, which can be redeemed for cash at the customer's convenience and time of choosing.
  - f) The Premises will have adequate lighting inside and out.
  - g) Staff will be provided with portable alarm activators.

2. Ensure that gambling is conducted in a fair and open way

As you are aware, adherence to this licensing objective is primarily a matter for the Gambling Commission and the operator; and the Gambling Commission granted Luxury Leisure an operating licence for the relevant activities, as soon as the regime was implemented in 2007.

3. Protect children and other vulnerable persons from being harmed or exploited by gambling

- a) As with all of our national AGC operations (including the 71 North End Croydon site) we will operate a **Think 25** policy at the Premises. Our training on this policy will be given to all members of staff and refreshed regularly.
- b) Staff will be trained in relation to customer interaction and records of customer interactions will be maintained. Staff are trained in recognising customers who may be experiencing difficulties or stress and are able to signpost individuals to external support services as part of such an interaction. I deal further with training generally as a separate item below.
- c) As we do at all of our AGC sites in accordance with our operating licence conditions, we will offer self-exclusion to customers who experience difficulties with gambling.

We are members of a multi-operator self-exclusion scheme for AGCs administered by BACTA. At the end of any self-exclusion period, the self-exclusion will remain in place for a further 6 months unless the customer takes positive action in order to gamble again. Furthermore, our policies go beyond the requirements of our licence conditions in that following the expiry of the further 6-month period, the customer will be given one day to cool off before being allowed to access gambling facilities, regardless of when they choose to gamble again (ie not just within the 6-month period following the end of the self-exclusion period as set out in the LCCP). In any event, when the customer makes a request to return to gambling, a meeting will first be held with a trained member of staff before re-admittance is agreed and again, this will apply regardless of when the customer seeks to return to gamble.

- d) We retain the services of a third party independent test purchasing organisation, Serve Legal, to conduct unannounced test purchases at all of our age restricted sites and this will apply to the Premises. As you are aware, the results are reported to the relevant local authority and to the Gambling Commission. We have a higher "pass rate" than the industry average, and any issues are investigated promptly and dealt with.

In terms of training generally, our staff are provided with detailed training on induction and this is refreshed at regular intervals. Training covers a wide range of areas including legislative and licence requirements and matters of social responsibility (such as categories and numbers of gaming machines; stakes and prizes; age verification procedures; identification of and interaction with vulnerable persons; signposting; and the importance of not encouraging customers to enter into dangerous gambling activity). We have introduced a bespoke e-learning training system to augment our training for staff and this includes modules on social responsibility.

In compliance with applicable Gambling Commission machine technical standards, the details of return to player percentages are provided for each game.

Finally, amongst the notices on the Premises and in compliance with legislation, there will be notices displayed in a prominent place at the entrances to the Premises stating that no persons under the age of 18 will be permitted to enter and that the consumption of alcohol will not be permitted on the Premises at any time.

I trust that the above will provide you with the information you require to process the application, but if anything further is required, please let me know.

On the basis of the above, I accordingly enclose:-

- an application form;
- a drawing referenced TH 001. You will see that the drawing is coloured to show the boundary of the premises marked red and the gaming machine area marked green. We draw your attention to the notes on the drawing; and
- a Local Risk Assessment for the site. As you will note, it has been prepared as if we were trading at the Premises.

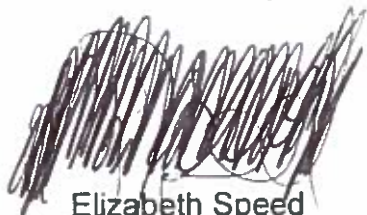
You are already in receipt of our cheque in the sum of £2,000.00 in respect of the application fee.

I confirm that within 7 days of the date on which the application is made, the Responsible Authorities (details of which have been kindly confirmed by your licensing officers) will be served with notice of the application in statutory form. The requisite press notice will be published in the Croydon Advertiser within 10 working days, starting on the day after the date the application is made. The requisite site notice will, from the date on which the application is made, be displayed for 28 consecutive days, again in accordance with regulations.

We will contact you in early course to discuss the application in more detail and to answer any outstanding questions. Once the consultation period has run its course we will need to liaise with you with regard to the date of issue of the licence to allow for the relevant internal fit out works.

In the meantime, please acknowledge receipt of the application and confirm that it is in order.

Yours faithfully



Elizabeth Speed  
Group General Counsel  
Novomatic UK  
For Luxury Leisure

Direct +44 (0) ~~XXXXXXXXXX~~

Mobile +44 (0) ~~XXXXXXXXXX~~

~~XXXXXXXXXX~~

**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:

**LUXURY LEISURE**

*[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:

**362C DUKESWAY  
TEAM VALLEY TRADING ESTATE  
GATESHEAD  
TYNE & WEAR**

Postcode: **NE11 0PZ**

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

**000-001876-N-103087-020**

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:

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):

**ADMIRAL**

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

**91 HIGH STREET  
THORNTON HEATH**

Postcode: **CR7 8RY**

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

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

**THE PREMISES WILL BE LOCATED ON THE GROUND FLOOR OF A THREE-STOREY PREMISES WITH RESIDENTIAL AT FIRST AND SECOND FLOORS IN A PARADE OF COMMERCIAL RETAIL UNITS**

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:

**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.

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon	<i>hh:mm</i>	<i>hh:mm</i>	
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:



**Part 5 – Miscellaneous**

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

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

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

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

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

**AGC PREMISES LICENCE REFERENCED 15/00747/GAMAGC FOR ADMIRAL, 71 NORTH END, CROYDON, CR0 1TJ**

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

**AS PER OUR LETTER WE WILL LIAISE WITH YOU ABOUT THE DATE OF ISSUE OF THE LICENCE**

**Part 6 – Declarations and Checklist (Please tick)**

I/ We confirm that, to the best of my/ our knowledge, the information contained in this application is true. I/ 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.

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

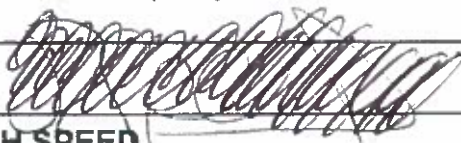
Checklist:

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

**Part 7 – Signatures**

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

Signature:



Print Name: **ELIZABETH SPEED**

Date: **15<sup>TH</sup> FEBRUARY 2019** Capacity: **GROUP GENERAL COUNSEL**

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: (dd/mm/yyyy) 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:

**ELIZABETH SPEED – GROUP GENERAL COUNSEL**

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

**0191 497 8200**

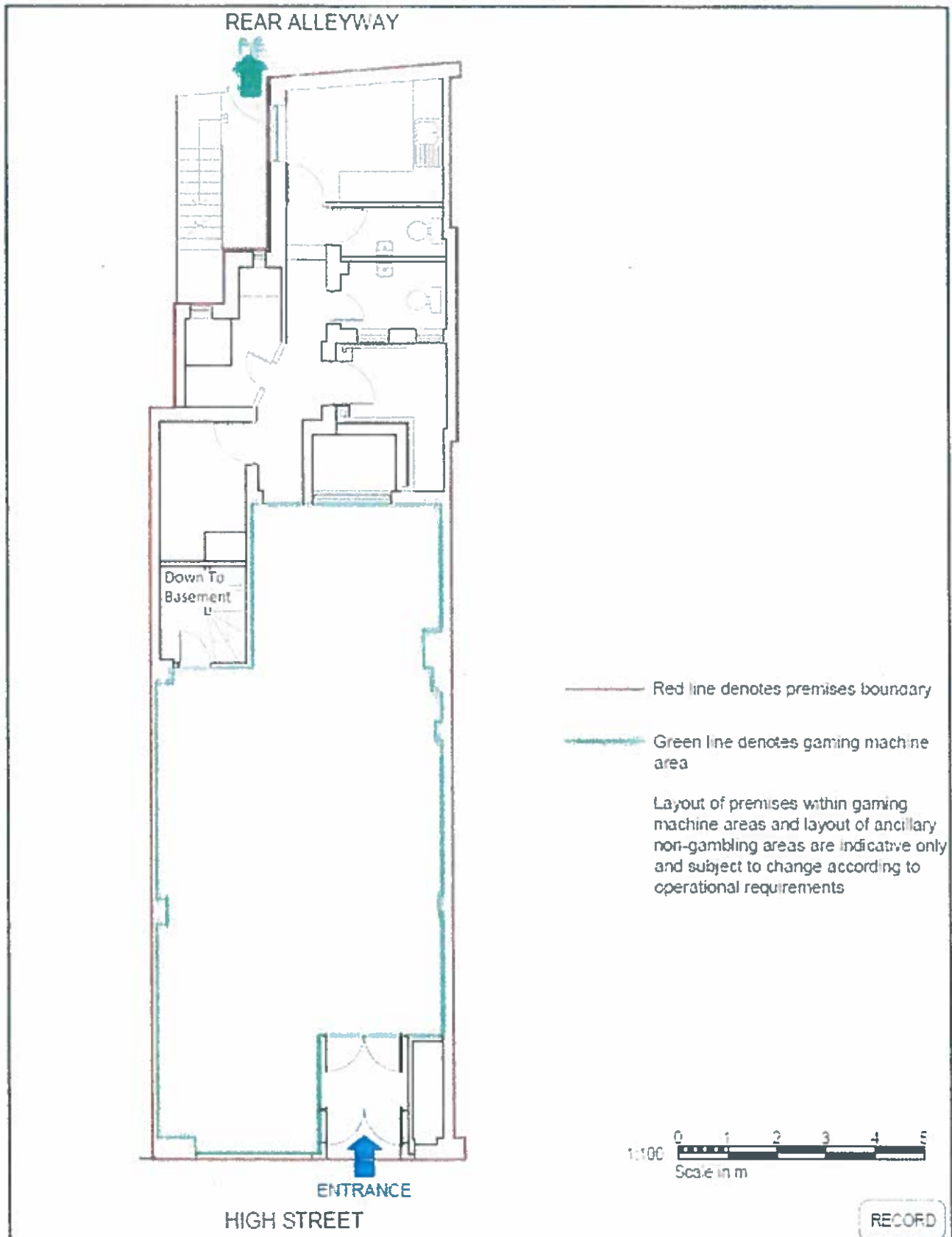
24. Postal address for correspondence associated with this application:

**LUXURY LEISURE  
362C DUKESWAY  
TEAM VALLEY TRADING ESTATE  
GATESHEAD  
TYNE & WEAR**

Postcode: **NE11 0PZ**

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

~~elizabeth.speed@groupgeneralcounsel.co.uk~~



DWG NO: TH 001
CLIENT: Admiral
PROJECT: 91 High Street THORNTON HEATH Croydon CR7 8RY

TITLE: LICENSING PLAN GAMBLING ACT 2005
Revision: --      IC-B01ED: GB
SCALE: 1:100 @ A4      DATE: 10/1/19

**NOVOMATIC**  
Novomatic International Ltd. Ltd.  
 1000 Queen Street  
 10 7th Street, Glasgow, G4 0JF  
 011 437 4444, 011 437 4444

44 91 9 42 700    www.novomatic.com    www.novomatic.com

# Social Responsibility Local Gambling Risk Assessment



## Premises

Premises Name:	Admiral Thornton Heath
Premises Address:	91 High Street, Thornton Heath
Premises Post Code:	CR7 8RY
Premises Licence Number:	
Category of Premises:	AGC

## Company

Operating Company:	Luxury Leisure
Operating Licence Number:	1876

## Assessment Writer

Name of Person Writing this Assessment:	Mark Thompson
Position within Company or Name of Authorised Agent:	Head of Risk and Compliance
Date of this Assessment	February 2019
Date that Original Assessment was written	February 2019

## Gambling Act 2005 – The Licensing Objectives

The Gambling Act 2005 sets out the three licensing objectives (LO), which are:

- (A) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- (B) Ensuring that gambling is conducted in a fair and open way; and
- (C) Protecting children and other vulnerable people from being harmed or exploited by gambling.

# Social Responsibility Local Gambling Risk Assessment

## Local Area and Site Profile

The local authority statement of principles in relation to the Gambling Act 2005 has been considered in the completion of this assessment. The statement does not offer specific guidance on the geographic extent to be considered when completing this assessment but on request the local authority have provided a local area profile. In the absence of specific guidance about the geographical extent of the vicinity, as a standard we use a radius of 500 metres from all of our venues in order to identify locations, the proximity of which, may present a risk to the licensing objectives should our operation not implement sufficient mitigating measures.

The local area profile is helpful in highlighting the diversity of the area around high street and its commercial premises. Total crime figures for the year are included as is a snapshot of December 2018 which highlights the three most prevalent crime types as theft from vehicle, vandalism and violence. The area is further identified as an area of economic and social deprivation and some helpful graphics are supplied to illustrate this. The profile states that there are two secondary schools nearby but they are not in the 500 metre radius used in the compilation of this assessment but Bensham Manor secondary school is the closest, just beyond this radius and its website describes it as an, 'oversubscribed secondary special school in Thornton Heath' and this has been taken into account within this risk assessment.

The AGC is located on the local high street in this suburb in the borough of Croydon where it is located next to a solicitor's office and a Boots Opticians. Nearby are a number of other local shops with a high density of independent food outlets, hairdressers and barber shops. There are 4 high street bookmakers in the vicinity also (the Beffred shown on our risk mapping tool is no longer there) and a Costa coffee shop. Opposite the venue is a local sports and leisure centre where there are classes and activities for children. There are ATM facilities at the nearby Tesco store. There are a small number of premises licensed for the sale and consumption of alcohol within the 500 metre radius used in the compilation of this assessment but none in the immediate vicinity of the premises.

There are no schools for children of secondary school age in the radius but as stated above Bensham Manor lies just outside and there are a number of nurseries and primary schools. There are also a number of places for worship in the vicinity and a GPs practice. There is also a Salvation Army premises and a hostel nearby. These are places where the vulnerable may congregate and have been considered in this assessment.

There are bus stops outside of the venue and on the opposite side of the street. The mainline train station is approximately 100 metres away, a short walk from the premises.

The venue has a single entrance/exit at street level to the front, a double doorway leading to a small lobby and a second double doorway, creating an air-lock style entrance. The second doorway then leads directly into the gaming area which is largely rectangular in shape. The meet and greet station is located prominently towards the front of the store giving a clear line of sight and control of the entrance.

## Social Responsibility Local Gambling Risk Assessment

There are no known local problems with crime or anti-social behaviour specifically linked to gambling but the area itself does have relatively high levels of some crime types. In November there were 82 reported crimes within a ¼ mile of the venue post code. The biggest contributors to this figure were ASB (14) and violent crime (21). There were also 3 robberies and 0 Theft person but this number appears lower than previous months. (Source - ukcrimestats.com)

The venue trades 7 days per week 24 hours a day, closing early one morning per week to complete a weekly accounting process. Night trading has the additional support of an access control system fitted to the entrance and specifically employed night staffing.

Risk Identification	LO	Level of Risk	Impact	Risk Management	Reviewed
Children entering site unnoticed.	C	Low	Severe to business. Severe to child.	- Layout of premises considered in staff numbers and deployment. There are always two members of staff employed at busy periods of the day, especially at school closing times. - Staff deployed to specific zones for which they have responsibility. - Machine layout takes into consideration lines of site to the entrance. - There is a lobby area beyond the doorway from the street ensuring that those who enter cannot simply inadvertently walk in without passing through a further door and past clear Over 18 signage. - The meet and greet station is positioned prominently to give a clear line of sight to the entrance.	February 2019
Children entering site unnoticed.	C	Low	Severe to business. Severe to child.	- Machine layout takes into consideration lines of site to the entrance. - There is a lobby area beyond the doorway from the street ensuring that those who enter cannot simply inadvertently walk in without passing through a further door and past clear Over 18 signage. - The meet and greet station is positioned prominently to give a clear line of sight to the entrance. - CCTV cameras positioned to cover the entrance and all parts of the gaming area.	February 2019
Children enter site with adult.	C	Low	Severe to business. Moderate to child.	- There is a lobby area beyond the doorway from the street ensuring that those who enter cannot simply inadvertently walk in without passing through a further door and past clear Over 18 signage. - The meet and greet station is positioned prominently to give a clear line of sight to the entrance. - CCTV cameras positioned to cover the entrance and all parts of the gaming area.	February 2019
Children enter site and play before being noticed.	C	Low	Severe to business. Severe to child.	- The meet and greet station is positioned prominently to give a clear line of sight to the entrance. - CCTV cameras positioned to cover the entrance and all parts of the gaming area.	February 2019
Children enter site and play where age is misjudged.	C	Low	Severe to business. Severe to child.	- CCTV cameras positioned to cover the entrance and all parts of the gaming area.	February 2019

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## Social Responsibility Local Gambling Risk Assessment

Age verification is not sought.	C	Low	Severe to business.	<ul style="list-style-type: none"> <li>- A Staffguard system has been installed to provide additional security and assist staff manage the premises.</li> <li>- There is a 'Think 25' policy in operation which has been trained to all staff.</li> <li>- All staff are trained in social responsibility as part of their induction and are provided with regular refresher training.</li> <li>- Posters and displays of acceptable identification on site for staff.</li> <li>- Clear 'Over 18' signage is displayed, visible from outside, in the entrance to the arcade and on the machines.</li> <li>- Luxury Leisure/Talarius use independent test purchasing operations. All venues are tested at least twice in a rolling 12-month period and the pass rate for 2018 was 93.8%.</li> <li>- Stringent disciplinary procedures are in place for failures identified through Test Purchasing or other investigation.</li> <li>- Social Responsibility returns data reviewed weekly through submissions from Area Managers to National Compliance Manager.</li> <li>- All social responsibility returns data subject to a quarterly compliance review by the company directors.</li> </ul>	February 2019
Children knowingly allowed to play.	C	Low	Severe to business. Severe to child.		February 2019
Those made vulnerable through abuse of drugs and/or alcohol having access to gambling. Those considered to be vulnerable, having access to gambling. (We adopt a broad definition of 'vulnerable' to include but not limited to those suffering from mental illness, recently bereaved, suffering from long-term or terminal illness, difficulty communicating, learning disability, substance misuse or addiction, breakdown of close personal relationships etc).		Low	Severe to business. Severe to individual.		February 2019
Failure to provide information to players on responsible gambling.	C	Low	Severe to business Severe to customer	<ul style="list-style-type: none"> <li>- Responsible Gambling posters and leaflet holders containing 'Stay in Control' leaflets prominently displayed and well stocked.</li> </ul>	February 2019

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## Social Responsibility Local Gambling Risk Assessment

<p>Failure to provide information in a suitable format.</p>	<p>C</p>	<p>Low</p>	<p>Severe to business. Severe to customer.</p>	<ul style="list-style-type: none"> <li>- Poster/Leaflet designs to incorporate QR codes for GAMCARE, Playnice.org and Gambleaware contact information.</li> <li>- Responsible Gambling information stickers on all machines.</li> <li>- Compliance Audit function performed by Area Manager and also through regional field auditors and security managers.</li> </ul>	<p>February 2019</p>
<p>Failure to recognise signs of problem gambling.</p>	<p>C</p>	<p>Low</p>	<p>Severe to business Severe to customer</p>	<ul style="list-style-type: none"> <li>- Additional aspects to training incorporating guidance on identifying problem gambling, procedure for interaction and sources of help.</li> <li>- Clear policy to detail the procedure for interaction and level of staff that can 'intervene'.</li> </ul>	<p>February 2019</p>
<p>Failure to interact with customer displaying signs of problem gambling.</p>	<p>C</p>	<p>Low</p>	<p>Severe to business. Severe to customer.</p>	<ul style="list-style-type: none"> <li>- New 'Stay in control leaflets' with QR codes to Playnice.org and GAMCARE and Gambleaware.</li> <li>- All recorded SR data subject to a quarterly compliance review by senior management.</li> </ul>	<p>February 2019</p>
<p>Failure to sign-post customer to help and support.</p>	<p>C</p>	<p>Low</p>	<p>Severe to business. Severe to customer.</p>		<p>February 2019</p>
<p>Failure to properly administer self-exclusion.</p>	<p>C</p>	<p>Low</p>	<p>Severe to business. Severe to customer.</p>	<ul style="list-style-type: none"> <li>- Staff training incorporates policy and procedure for self-exclusion.</li> </ul>	<p>February 2019</p>
<p>Failure to impose exclusion in locality and in same types of establishments.</p>	<p>C</p>	<p>Low</p>	<p>Severe to business. Severe to customer.</p>	<ul style="list-style-type: none"> <li>- Since April 2016 Luxury Leisure/Talarius have operated both of the AGC national multi-operator self-exclusion schemes, offered through BACTA and IHL.</li> <li>- Digital cameras or suitable tablet devices are provided at all sites to take an image of</li> </ul>	<p>February 2019</p>

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## Social Responsibility Local Gambling Risk Assessment

Customer breaches of self-exclusion.	C	Low	Severe to business. Severe to customer.	<p>customers wishing to self-exclude so that the exclusion can be effectively enforced.</p> <ul style="list-style-type: none"> <li>- The location of the site in relation to the customer's home address and any regular routes to work for example will be considered if the customer requests a wider exclusion.</li> <li>- All SR returns data subject to a quarterly compliance review.</li> </ul>	February 2019
Customer breaches self-exclusion by using another to gamble on their behalf.	C	Unknown	Moderate to business. Severe to customer.		February 2019
Money Laundering (Dye stained notes and Criminal spend).	A	Low	Low – Severe	<ul style="list-style-type: none"> <li>- Appointed Money Laundering Reporting Officer (MLRO).</li> <li>- Staff training at induction and refresh training.</li> <li>- Luxury Leisure/Talarius have a corporate AML Risk Assessment and policies and procedures relating to AML.</li> <li>- Automated alerts via Sentinel relating to machine note levels and handpay limits.</li> <li>- Technical parameters on note acceptors designed to reject poor quality notes. (Often notes obtained by way of robbery are perished).</li> <li>- Manufacturer activity alerts from SG Gaming.</li> <li>- TITO tickets not transferable between sites.</li> <li>- Slim change machines set up so that notes cannot be changed 'up'.</li> <li>- Comprehensive CCTV coverage in all sites.</li> <li>- Partnerships with local police where appropriate to identify and discourage criminal spend.</li> </ul>	February 2019
Commission of criminal offences to fund problem gambling	A	Low	Low – Severe	<ul style="list-style-type: none"> <li>- Stringent policy and procedures in place to identify and intervene with customers who may be vulnerable to harm through problem gambling. See above under Information to players, Customer Interaction and Self-Exclusion.</li> </ul>	February 2019

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## Social Responsibility Local Gambling Risk Assessment

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Anti-social behaviour associated with late night operation	A	Low	Low – Severe	February 2019
Poor security increasing vulnerability to robbery or theft.	A	Low	Low – Severe	February 2019
Failure to display Terms and Conditions	B	Low	Low – Moderate	February 2019
Failure to deal with customers making complaints about the outcome of gambling	B	Low	Low – Moderate	February 2019

## Social Responsibility Local Gambling Risk Assessment

### Requirement to Comply

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences

Effective as at 6 April 2016

Social responsibility code provision 10.1.1

1. Licensees must 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 making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.
2. Licensees must review (and update as necessary) their local risk assessments.
  - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
  - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
  - c. when applying for a variation of a premises licence; and
  - d. in any case, undertake a local risk assessment when applying for a new premises licence.

### Ordinary code provision 10.1.2

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.



# Selected Location Types

## Banks

Name: C I C  
Address: Kettering Court, 4 Brigstock Road, Thornton Heath

## Betting shops

Name: William Hill  
Address: 1 High St, Thornton Heath

Name: William Hill  
Address: 105 High St, Thornton Heath

Name: Coral  
Address: Unit 8, Ambassador House, Brigstock Rd, Thornton Heath

Name: Betfred  
Address: 56-58 High St, Thornton Heath

Name: William Hill  
Address: 111 Parchmore Rd, Thornton Heath

Name: Paddy Power

Address: 104 High St, Thornton Heath

 **Casino/AGC**

 **Doctors Surgery**

Name: Boots Opticians

Address: 87 High Street, Thornton Heath

Name: Dr K Haider - Parchmore Medical Centre

Address: Parchmore Medical Centre, Thornton Heath

 **Drug and Alcohol Treatment facilities**

 **Hostels**

 **Nurseries**

Name: Thornton Heath Nursery School

Address: 51 Pridham Rd, Thornton Heath

Name: Parchmore Pre-school

Address: 53-55 Parchmore Rd, Thornton Heath

Name: Allens Montessori Day Nursery Ltd

Address: 47 Beulah Rd, Thornton Heath

FF

Name: King Fishers Pre School & Day Nursery  
Address: 89 Brigstock Rd, Thornton Heath

Name: red robin montessori nursery  
Address: 83 Bensham Manor Rd, Thornton Heath

Name: JandSPlayhouse  
Address: 23 Heath Rd, Thornton Heath

Name: Little Saints Day Nursery  
Address: 92 Parchmore Rd, Thornton Heath

Name: Little Ann Day Nursery  
Address: 1 Whitehorse Ln, London

Name: Monkey Puzzle Day Nursery South Norwood  
Address: 93 Whitehorse Ln, London

Name: Scribbles Day Nursery  
Address: 30 Bensham Manor Rd, Thornton Heath

Name: Alpha Day Nursery  
Address: St John's Congregational Church Hall, Bensham Manor Road, Thornton Heath

 Pawn Shops

 Payday Loan Shops

 Place of worship

Name: Thornton heath Islamic Centre  
Address: 150 Gillett Road, Thornton Heath

Name: Parchmore Methodist Church  
Address: 55 Parchmore Road, Thornton Heath

Name: Croydon Community Church  
Address: 21-23 Woodville Road, Thornton Heath

Name: Elim Iranian Church in london  
Address: 21 - 23 Norwhich Rd, Croydon

Name: Parchmore Methodist Church, Youth and Community Centre  
Address: Parchmore Methodist Church, 53 Parchmore Road, Thornton Heath

Name: Amazing Grace Ministries KC Int  
Address: Salvation Army Building, 66 High Street, Thornton Heath

Name: Daughters of Mary & Joseph



Address: 36-38 Brook Road, Thornton Heath

Name: St Andrews Thornton Heath

Address: 45 Brook Road, Thornton Heath

Name: St Andrew's Church

Address: 45 Brook Road, Thornton Heath

Name: Clifton Hall

Address: 45 Whitehorse Lane, London

Name: Saint Andrew's Roman Catholic Church

Address: 38 Brook Road, Thornton Heath

Name: Born Again Revival Tabernacle Croydon

Address: 66 High Street, Salvation army, Thornton Heath

Name: Saint John's Congregational (Evangelical)

Address: 129A Bensham Manor Road, Thornton Heath

Name: St Paul's Church

Address: Saint Paul's Road, Thornton Heath

Name: Church Of God UK "The Good Shepherd"

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Address: 2 Norfolk Road, Thornton Heath

Name: Thornton Church

Address: 2 Norfolk Road, Thornton Heath

Name: Thortorn Heath

Address: 2 Norfolk Road, Thornton Heath

Name: Sakthy Ghanapathy Temple

Address: 21 Brigstock Road, Thornton Heath

## Pubs and Bars

Name: The Railway Telegraph

Address: 19 Brigstock Road, Thornton Heath

Name: Pig and whistle

Address: Liverpool Road, Thornton Heath

Name: The Prince George

Address: 2 High Street, Thornton Heath

Name: pub

Address: 54-46 Zion Road, Thornton Heath

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## School

- Name: Thornton Heath Nursery School  
Address: 51 Pridham Road, Thornton Heath
- Name: red robin montessori nursery  
Address: 83 Bensham Manor Road, Thornton Heath
- Name: Keyboard Lessons  
Address: 73 Woodville Road, Thornton Heath, Croydon
- Name: Singing Lessons  
Address: 73 Woodville Road, Thornton Heath
- Name: Alpha Day Nursery  
Address: St John's Congregational Church Hall, Bensham Manor Road, Thornton Heath
- Name: Drum Lessons  
Address: 73 Woodville Road, Thornton Heath, Croydon
- Name: Guitar Lessons  
Address: 73 Woodville Road, Thornton Heath
- Name: Parchmore Pre-school

Address: 53-55 Parchmore Road, Thornton Heath

Name: Little Ann Day Nursery

Address: 1 Whitehorse Lane, London

Name: Whitehorse Manor Junior School

Address: Whitehorse Road, Thornton Heath

Name: Scribbles Day Nursery

Address: 30 Bensham Manor Road, Thornton Heath

Name: Daffodils Day Nursery

Address: 23-27 Parchmore Road, Thornton Heath

Name: Amazing Grace Nursery School

Address: St John's Church, Bensham Manor Road

Name: Memorial Sunday Schools

Address: Fernham Road, Thornton Heath

Name: Whitehorse Manor Infant School

Address: Whitehorse Road, Thornton Heath

Name: Redeemer Hope International School

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Address: Bridge House, Thornton Heath

### Transport nodes

Name: Thornton Heath - Garnet Road Car Park

Address: Thornton Heath

Name: Thornton Heath Clock Tower

Address: United Kingdom

Name: Thornton Heath

Address: United Kingdom

Name: Thornton Heath Clock Tower (Stop H)

Address: United Kingdom

Name: Thornton Heath Clock Tower (Stop G)

Address: United Kingdom

Name: Parchmore Road (Stop E)

Address: United Kingdom

Name: Thornton Heath Station (Stop C)

Address: United Kingdom

Name: Thornton Heath Clock Tower (Stop F)  
Address: United Kingdom

Name: Thornton Heath Station (Stop D)  
Address: United Kingdom

Name: Thornton Heath  
Address: United Kingdom

Name: High Street Whitehorse Lane (Stop K)  
Address: United Kingdom

Name: Nursery Road (Stop L)  
Address: United Kingdom

Name: Brook Road (Stop B)  
Address: United Kingdom

Name: Parchmore Methodist Church  
Address: United Kingdom

Name: Talbot Road Thornton Heath (Stop M)  
Address: United Kingdom

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Name: Brook Road  
Address: United Kingdom

Name: Parchmore Road  
Address: United Kingdom

Name: Talbot Road Zion Road  
Address: United Kingdom

Name: Talbot Road Thornton Heath (Stop N)  
Address: United Kingdom

Name: Parchmore Methodist Church  
Address: United Kingdom

## Area Profile of Thornton Heath

The Licensing Objectives in the Gambling Act 2005 are –

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

### Geographical Location

Thornton Heath is one of the wards that make up the borough of Croydon and lies to the north of Croydon town centre. It has a population of 16,539 (2011 Census). Adjacent wards include Norbury & Pollards Hill, Norbury Park, Crystal Palace & Upper Norwood, South Norwood, Selhurst and Bensham Manor.

The area is focused along the High Street. The shops on the high street reflect the diversity of the area with African, Caribbean and Polish community shops and businesses present.

The high street has a modern leisure centre and a mixture of residential and commercial premises along its length, with the ground floor of most premises being used for commercial purposes and the upper floors being used for accommodation.

### Demography

Thornton Heath has a high degree of ethnic diversity. In the 2011 census, the Thornton Heath ward was 25% White British, 21% Black Caribbean and 15% Black African.

### Transport

The area is well served by buses & trains, with the nearest stations being Thornton Heath, Norbury, Norwood Junction and Selhurst. Croydon's Tram nearby tram system provides links to Wimbledon, Beckenham & New Addington.

### Crime and Disorder

The following figures were published by the Police for the Thornton Heath SNT area for 2018 –

A total of 1541 criminal offences which broken down comprised -

Violent Crime	547
Theft and handling	484
Robbery	83
Criminal Damage/Arson	141
Burglary	122
Drugs	60



Other Notifiable	32
Sexual Offences	42
Fraud and Forgery	2

The Police report that in December 2018, the top reported crimes in the Thornton Heath area were –

- Theft from a vehicle 23
- Vandalism 21
- Violence 16

### Index of Multiple Deprivation

Thornton Heath Croydon 006E

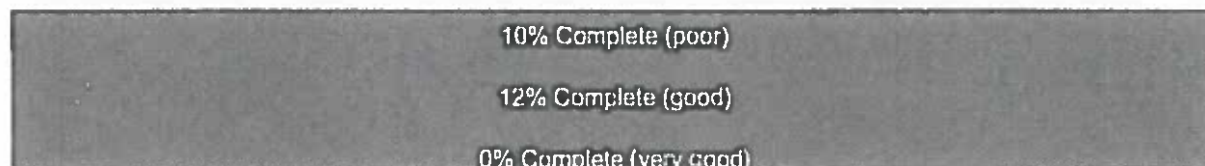
Ward: Thornton Heath

Local Authority: Croydon (Contact Council)

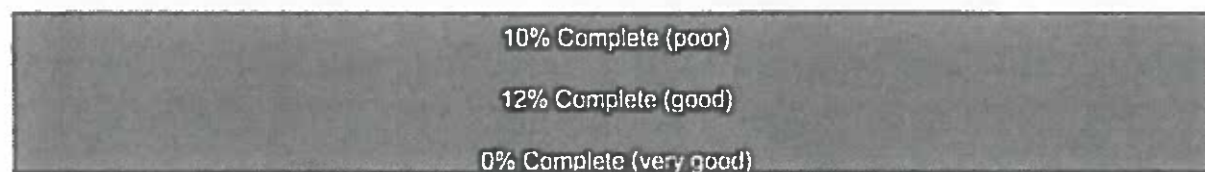
In the latest Index of Multiple Deprivation (IMD) this area was ranked 7,229 out of 32,844 in England, where 1 was the most deprived and 32,844 the least.

This is broken down further by income; employment; health; education, barriers to services; living environment; and crime.

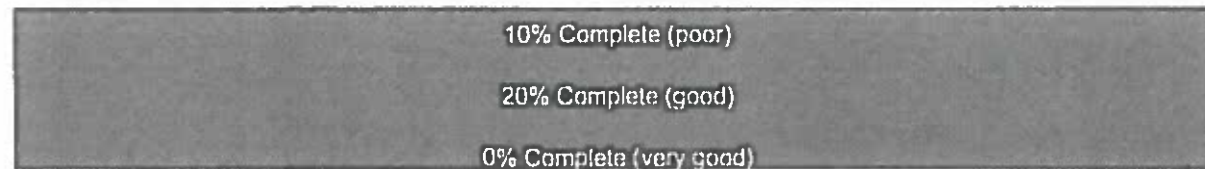
**Overall: 22%** Better than 22% of areas in England



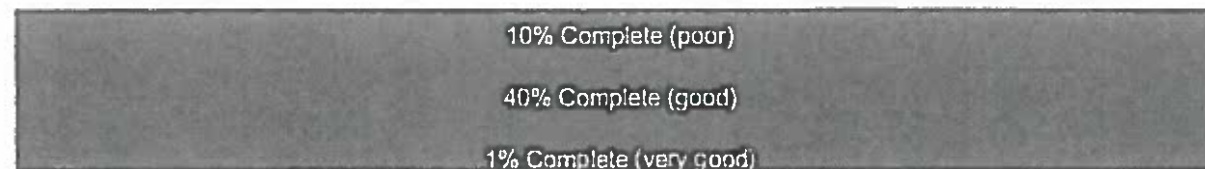
**Income Deprivation: 22%** Better than 22% of areas in England



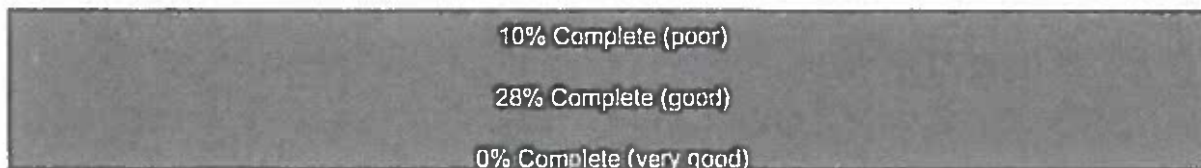
**Employment: 30%** Better than 30% of areas in England



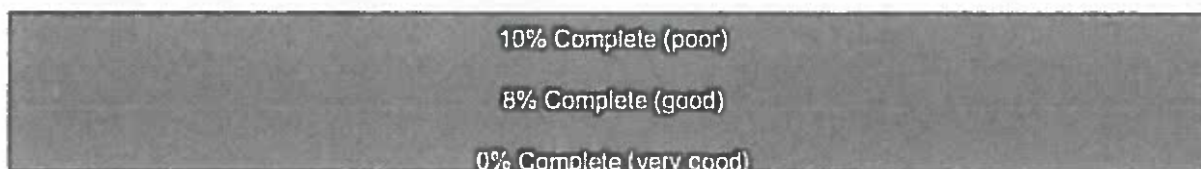
**Health: 51%** Better than 51% of areas in England



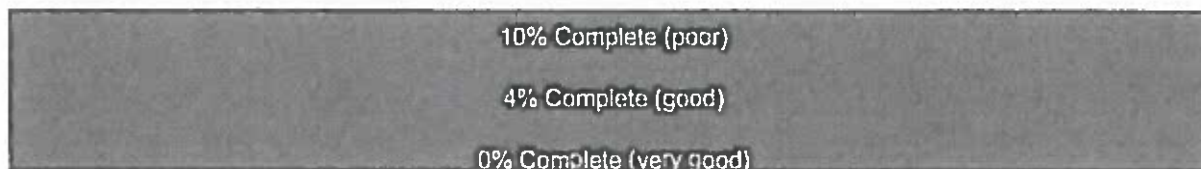
**Education: 38%** Better than 38% of areas in England



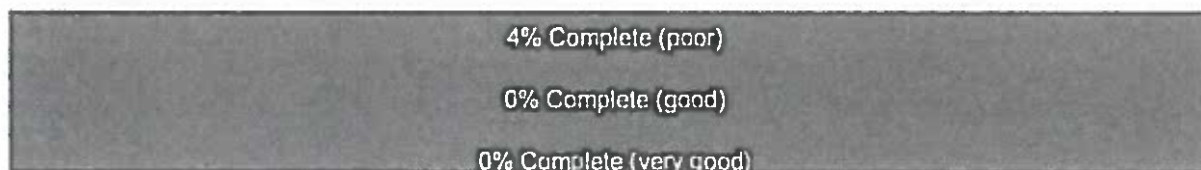
**Barriers to Services: 18%** Better than 18% of areas in England



**Living Environment: 14%** Better than 14% of areas in England



**Crime: 4%** Better than 4% of areas in England



### Commerce

Thornton Heath is predominantly small businesses though there is also a large Tesco supermarket. There is one public house on the High Street, at the eastern end. There are currently 4 empty commercial premises. There are 4 betting shops on or near the High Street.

### Education

There are 5 primary and 2 secondary schools in the vicinity of High Street, Thornton Heath. There is a library to the west on Brigstock Road.

### Health Trust

There are several GP surgeries in the area and the Croydon University Teaching Hospital is nearby.

### Recreation

There is a leisure centre with swimming pool on High Street. There is park and three recreation grounds in the vicinity.

Accommodation

There is one young persons' hostel in the vicinity of High Street. There is also age restricted Council Housing and a high density of shared supported housing in the area.

Representations on behalf of the Commissioner of the Metropolitan Police.

Gambling Act 2005

An application for an Adult Gaming Centre

Applicant: Luxury Leisure

Premises: Admiral, 91 High Street, Thornton Heath, Croydon, CR7 8RY.

I object to this application as in its present form it does not support the following Licensing Objectives

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The premises falls within a Cumulative Impact Zone as designated within the Croydon council statement of licensing policy. Whilst this is more relevant to off sales of alcohol. Problems associated with the Licensing Act are very similar to what we have seen in gambling establishments. Police are of the belief that allowing a further premises to operate late into the night would increase the crime and disorder which the CIZ has been implemented to prevent and or reduce.

The premises is situated in Thornton Heath High Street. A mainly commercial high street with accommodation above most of the commercial properties. It is also close to residential streets. The location is served by a selection of varied premises such as Pubs, Off Licences, Betting shops, late night food takeaways, shops and restaurants. Some are open and trade until the early hours of the morning none trade 24 hours per day.

Police records and experience of the locality of this application indicate that a variety of types of Crime and disorder can be associated with the locality to the premises, e.g. Gang activity, weapons offences, drugs offences, assault, criminal damage and theft related offences. A statement to be supplied from local neighbourhood officers.

The general location is well known for gang tensions and weapons, there have previously been large groups of people hanging around and stabbings, one actually in a betting shop and one which one has resulted in a crime scene for a murder. An attempted stabbing happened last week on 05/03/2019 whereby a person was attacked with knives but managed to dodge them leaving slash marks on his coat.

There is a prolific drugs issue in the area which lends its self to high volume of drugs users looking for a place to congregate and hang around locally. Any venue open overnight will lend itself as a place where these, vulnerable people vagrants and persons linked to drugs frequent this premises.

I have been in discussion with a representative of the applicant via the telephone and E-Mail (Mark THOMPSON).

He has given a list of suggested measures that may be put in place should the licence be granted. Whilst these conversations have been very positive and welcome they do not cover opening hours save for confirming that they want to operate 24 hours. They have also fallen short of employing SIA registered door staff at possible problematic hours. They have also stated that there will be 2 members of staff on duty at busy periods.

Police feel that at less busy times single staffing leaves a lone staff member and the venue extremely vulnerable and do not support any lone staffing.

The default position within the Gambling Act 2005 on operating hours for ADULT GAMING CENTRE (AGC) applications are defaulted at 24 hours every day. Police are not happy for this premises to be open 24 hours. The applicant has accepted that the area suffers from deprivation and crime, but suggests they are not specifically linked to gambling.

The proposed use of this property as an adult gaming centre was refused planning permission 08/02/19

***The Polices preferred option is to refuse this application as it stands 24 hours 7 days per week.***

13/03/2019

Tony Rose

PC 2459 SN.

Croydon Borough Licensing Officer.

From: ~~Buller Road~~  
Sent: 07 March 2019 19:16  
To: LICENSING <[LICENSING@croydon.gov.uk](mailto:LICENSING@croydon.gov.uk)>  
Subject: Objection to Admiral seeking license to operate in Thornton heath

Hello,

I want to object to Admiral looking for a license to operate in Thornton heath.

My reasons are:

Under the Gambling Act 2005, these are:

- (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
- (b) ensuring that gambling is conducted in a fair and open way, and
- (c) protecting children and other vulnerable persons from being harmed or exploited by gambling

Application for a Adult Gaming Centre Licence under the Gambling Act 2005  
15/02/2019

Admiral, 91 High Street, Thornton Heath, CR7 8RY

I feel unsafe walking along Thornton heath high street home from work. So many intimidating people hang around outside the current gambling shops and I have even witnessed a fight. I don't want to see any more in the area and I think they prey on the vulnerable people that live nearby.

~~Buller Road~~  
Buller Road  
Thornton heath  
~~CR7 8RY~~

From: ~~Bob Stanger~~ <>  
 Sent: 13 March 2019 16:27  
 To: LICENSING  
 Subject: Re: Adult Gaming Centre Thornton Heath High Street

Hello

I am writing to object to Admiral, 91 High Street, Thornton Heath, CR7 8RY.

The grounds for my objection are:

- (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
- (b) ensuring that gambling is conducted in a fair and open way, and
- (c) protecting children and other vulnerable persons from being harmed or exploited by gambling

We have more than 1000 signatures on the petition (online and on paper) against this gambling centre:

<https://www.change.org/p/croydon-council-planning-committee-object-to-adult-gaming-centre-on-thornton-heath-high-street>

Local news have covered it:

<https://www.thorntonheathchronicle.co.uk/hundreds-sign-petition-against-gambling-arcade-on-the-high-street/>

<https://insidecroydon.com/2019/02/08/jackpot-for-thornton-heath-campaign-as-slots-arcade-rejected/>

[https://www.mylondon.news/news/south-london-news/people-thornton-heath-dont-want-15667173?fbclid=IwAR1ZaoCyIF3T25payPbQ\\_PnnweBMAjmZr9czn6mYF6oWvrFFf481lo04oLQ](https://www.mylondon.news/news/south-london-news/people-thornton-heath-dont-want-15667173?fbclid=IwAR1ZaoCyIF3T25payPbQ_PnnweBMAjmZr9czn6mYF6oWvrFFf481lo04oLQ)

We don't want any more gaming/betting shops in Thornton Heath, we want family friendly shopping.

I am objecting strongly to this application being given a licence. Under the Gambling Act 2005 we need to protect our vulnerable persons and children from these centres. Thornton Heath needs to be family friendly and any new units opening should definitely reflect this. Gambling can be addictive, we already have too many betting shops in Thornton Heath. We do not need any more.

I am a local Group Scout Leader providing ongoing support to the young people in the area so that they can learn skills for life. We need to bring positive new life to our High Street. Places that families can visit and enjoy together, this centre would be a negative and unwelcomed addition.

A big no to the Gaming Centre. Please do not grant a licence.

From: ~~Redacted~~ [mailto: ]  
Sent: 14 March 2019 20:36  
To: LICENSING <LICENSING@croydon.gov.uk>  
Subject: Re: Adult Gaming Centre Thornton Heath High Street

Please can I add the following to my objections:

My main objection is that the proposal was contrary to the Local Plan and therefore should be refused as it undermines the High Street's vitality and does not improve the mix of outlets at present available to all members of the public.

Also this suggested location will be opposite the large leisure centre used by many children and families. Weekly school swimming lessons take place there for many of the local schools. There are two schools in the close vicinity in Whitehorse Road and Brigstock Road.

The premises will be very near to 4 other betting shops, which are already too many for this area.

24 hours use could have a detrimental effect on the neighbouring properties which are mainly rental flats with young families evident. If additional police resources are required due to anti social behaviour this will also have a financial and community impact. Any incidents resulting in closure even temporarily of the High Street will cause mayhem on vehicular access, the High Street is extremely busy.

Thornton Heath ward has a high crime rate and high levels of anti social behaviour, theft, criminal damage, drugs and violent and sexual offences.

No more possibly addictive opportunities should be allowed, the planning should be for all inclusive outlets encouraging cohesion for the local community not division or exclusion. Family and elderly friendly outlets are essential in order for the High Street to become a once again pleasant place to walk/drive along.

For all the further above reasons. I object

Kind regards

Thank you

~~Redacted~~

~~Redacted~~

Thornton Heath

~~Redacted~~



From: ~~Christine Pearce~~ [mailto:]  
Sent: 14 March 2019 23:32  
To: LICENSING <[LICENSING@croydon.gov.uk](mailto:LICENSING@croydon.gov.uk)>  
Subject: ADULT GAMING CENTRE - 91 THORNTON HEATH HIGH STREET

To whom it may concern:

ADULT GAMING CENTRE - THORNTON HEATH HIGH STREET - Admiral, 91 High Street, Thornton Heath, CR7 8RY

I object to the licence for Admiral to operate an adult gaming centre at the above stated address.

There are already a number of gambling establishments in Thornton Heath which has already proved detrimental to the area.

There have been recent reports of criminal acts such as damage to local betting shops and an additional such establishment would add to the anti social and criminal issues the community are faced with.

Thornton Heath has a high deprivation rate and the proposed location for this gaming centre is right opposite a leisure centre which is frequented by children and young people. This would only exploit and damage vulnerable people and expose children living in the area to even more gambling.

As an earlier petition raised by the community was already submitted and the initial application was rejected, I trust that this will be upheld.

Best regards

~~Christine Pearce~~

~~1~~ Gilsland Road, Thornton Heath, ~~CR7 8RY~~

From: ~~Andreas~~ [mailto: ]  
 Sent: 13 March 2019 21:32  
 To: LICENSING <LICENSING@croydon.gov.uk>  
 Subject: Objection to licence for 91 High St, Thornton Heath

Dear sir/madam,

I am writing as ~~one~~ of the Thornton Heath Safer Neighbourhood ward panel to object to the application by Luxury Leisure (Admiral) for a licence for an adult gaming centre at 91 High Street, Thornton Heath.

The Thornton Heath Community Action Team, which I am ~~one~~ of, submitted an objection against the planning application for change of use presenting almost 1,000 signatures contained on two petitions. The main objection was that the proposal was contrary to the Local Plan and therefore should be refused as it undermines the High Street's vitality.

Many of the subsidiary objections are relevant in opposition now to the application for a gambling licence. They are as follows:

- The Thornton Heath ward has the third highest crime rate in Croydon with higher comparative levels of anti social behaviour, theft, criminal damage, drugs and violent and sexual offences. Source: [data.police.uk](http://data.police.uk)
- The adult gaming centre would be located in an area of high deprivation (Source: DCLG, 2015) which is associated with poor physical and mental health.
- The proposed premises are opposite a leisure centre which is regularly visited by groups of primary age children attending swimming lessons. There are two Whitehorse Manor primary schools at either end of the High Street on Whitehorse Road and Brigstock Road.
- The premises are a short distance walk from four other betting shops which already provide access to fixed odds betting terminals: William Hill X2, Paddy Power and Coral.

In addition in the reasons for refusing the planning application for change of use the Croydon Council planning officer states "The applicant has failed to demonstrate that the proposed 24 hours use would not have an adverse impact on neighbouring properties from activity and coming and goings associated with the use during more sensitive night-time hours."

Within the last couple of weeks police issued a photofit of man wanted in connection with smashing up a betting terminal after gambling and losing £500 on a gaming machine in a short space of time. Police resources are already considerably overstretched and there is no doubt that the existing betting shops attract elements of anti social behaviour which impacts on the community and the police don't have the manpower to deal with.

For all these reasons I object.

Many thanks  
~~Andreas~~  
 Luna Road  
 Thornton Heath  
~~CR8 3SD~~

From: Jewitt, Karen  
Sent: 13 March 2019 21:43  
To: LICENSING <[LICENSING@croydon.gov.uk](mailto:LICENSING@croydon.gov.uk)>  
Cc: Goddard, Michael <[Michael.Goddard@croydon.gov.uk](mailto:Michael.Goddard@croydon.gov.uk)>  
Subject: objection

**Admiral, 91 High Street, Thornton Heath, CR7 8RY**

- I wish to object to the license for the adult gaming machine application on the High Street Thornton Heath.

I am objecting on the grounds of public nuisance and safety due to the harm gambling does to families and individuals, although children will not have access they are harmed by the addiction of the adults caring for them.

I believe that none of the three objectives below will be met by introducing this establishment to our High Street.

- Ensuring gambling is kept free from crime and disorder
- Ensuring gambling is conducted in a fair an open way
- Protection of children and vulnerable adults

The planning application for these premises to be used for such an establishment has been turned down as it does not fit with the Croydon Plan for the area. I see no need in these circumstances to allow the premises license to be granted.

Cllr Karen Jewitt  
Thornton Heath Ward  
Chair of Croydon Co-op Party

A7

From: ~~XXXXXXXXXX~~ [mailto: ]  
Sent: 12 March 2019 22:14  
To: LICENSING <LICENSING@crowdon.gov.uk>  
Subject: Objection to ADULT GAMING CENTRE - THORNTON HEATH HIGH STREET

Dear sir or madam,

As a local resident (~~XXXXXX~~ Livingstone Road, Thornton Heath, ~~XXXXXX~~) I would like to officially object to the planning application:

Site of Thornton Heath HSBC Bank  
Admiral, 91 High Street, Thornton Heath, CR7 8RY.

I understand that the closing date for receipt of objections is midnight on Thursday 14th March.

My objections are based on the criteria of the Gambling Act 2005. Due to the high levels of crime and unfortunately street drinking in Thornton Heath, this change of usage would encourage crime and disorder:

- (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,*
  - (b) ensuring that gambling is conducted in a fair and open way, and*
  - (c) protecting children and other vulnerable persons from being harmed or exploited by gambling*
- Application for a Adult Gaming Centre Licence under the Gambling Act 2005*

Yours sincerely,  
~~XXXXXXXXXX~~  
~~XX~~ Livingstone Road  
~~XXXXXXXXXX~~

From: ~~XXXXXX~~ [mailto: ]  
Sent: 12 March 2019 13:31  
To: LICENSING <LICENSING@croydon.gov.uk>  
Subject: Admiral Adult Gaming Centre 91 High Street Thornton Heath CR7

Dear sir/madam

As a resident of Thornton Heath for over 25 years, I am writing to register my strong objections to the Application for a Adult Gaming Centre Licence under the Gambling Act 2005 for the proposed Admiral adult gaming centre at 91 High Street, Thornton Heath CR7 8RY for the following reasons:

**(a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.** Thornton Heath already has (too) many places for adults to gamble with frequent associated incidents of ASB/crime. Thornton Heath ward already has the third highest crime rate in Croydon and has comparatively high levels of violence and ASB compared with Croydon and England as a whole.

**(c) protecting children and other vulnerable persons from being harmed or exploited by gambling.** This adult gaming centre would be on the route to and from school for many young children due to the proposed situation in between 2 primary schools; also, it would be almost opposite Thornton Heath's Leisure Centre, well used regularly by classes of schoolchildren for swimming lessons. Children would be at risk of witnessing or becoming involved in distressing and frightening incidents of ASB/crime (see a above). With all the work done by the council as well as community volunteers to regenerate and improve the high street for all (including improving its health and vitality) ,granting a licence for this gaming centre would contradict this.

Yours faithfully,

~~XXXXXX~~

~~91~~ Frant Road, Thornton Heath ~~CR7 8RY~~

From: ~~XXXXXX~~ [mailto: ]  
Sent: 09 March 2019 00:51  
To: LICENSING <LICENSING@croydon.gov.uk>  
Subject: Thornton Heath Gambling Centre Appeal

Hi Croydon Licensing Team

I implore you to reconsider the affects of yet another gambling station on the high street, especially in the wake of closures of two banks. The imbalance will only invoke a negative disparity for the area and its inhabitants, both current and future.fg

I'd like to use the planning objectives to object. Under the Gambling Act 2005, these are:

- (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
- (b) ensuring that gambling is conducted in a fair and open way, and
- (c) protecting children and other vulnerable persons from being harmed or exploited by gambling

Application for a Adult Gaming Centre Licence under the Gambling Act 2005  
15/02/2019

Admiral, 91 High Street, Thornton Heath, CR7 8RY

Kind regards

~~XXXXXX~~

~~XX~~ Zion Road, Thornton Heath, ~~CR7 8RY~~

From: ~~0123456789~~ (mailto: )  
Sent: 07 March 2019 17:48  
To: LICENSING <LICENSING@croydon.gov.uk>  
Subject: Objection to Admiral Casino Licensing Application

I wish to object to the application for a licence to operate an Adult Gaming Centre/Casino at 91 Thornton Heath High Street (former HSBC Bank premises).

I understand the planning application for this change of use has already been refused by the planning committee. There are already 4 gambling establishments between Ambassador House and the Whitehorse Road end of the High Street which tap into the limited funds of people living in a deprived area. They also encourage anti-social behaviour and crime eg. Constant street drinking outside Corals at Ambassador House despite this being in an No Drinking area, and multiple police call-outs to these venues.

This particular venue is opposite the Thornton Heath Leisure which is visited throughout the day by school children. I feel that such an establishment would add nothing to the offer on the High Street and indeed would be detrimental to the area.

Yours,

~~0123456789~~  
~~01234~~, ~~01234~~ Melfort Road,  
Thornton Heath,  
~~0123456789~~.

From: ~~0192321500~~ [mailto: ]  
Sent: 28 February 2019 07:32  
To: LICENSING <LICENSING@croydon.gov.uk>  
Subject: Objection- 91 High Street, Thornton Heath, CR7

Dear All

I STRONGLY OBJECT to the granting of a gambling operating licence for 91 High Street, Thornton Heath, CR7 8RY under the Gambling Act 2005.

I object due to the following:

- prevention of crime and disorder
- prevention of public nuisance
- public safety
- protection of children from harm

Our area is socially deprived and has existing high levels of crime, addiction and unfortunately rough sleeping which should not be happening in 2019. Perhaps the company will be willing to 'house' some of our rough sleepers who need somewhere warm and comfortable at nights if they are to operate on a 24/7 basis? After all they are part of our community and deserve recognition too!

~~0192321500~~  
Milner Rd  
~~0192321500~~



From: ~~XXXXXX~~ [mailto: ]  
Sent: 28 February 2019 11:49  
To: LICENSING <LICENSING@croydon.gov.uk>  
Subject: Objection re: Adult Gaming Centre License : 91 high Street, Thornton Heath, CR7 8RY

Dear Sir / Madam,

Re: Objection to the Application for an Adult Gaming Centre License under the Gambling Act 2005, 15/02/2019 - 91 high Street, Thornton Heath, CR7 8RY

I write to strongly object to the application for a license to operate gaming machines on the premises: 91 high Street, Thornton Heath, CR7 8RY.

The reason for my objection is that I feel that any granting of this license would greatly add to the crime & disorder and public nuisance problems that the area and residents already suffer from. Despite the recent investments the High Street and the general surrounding area is still in dire need of further investment of funds, initiatives and resources to address some major issues that Thornton Heath is experiencing around the following:

- Crime and Disorder
- prevention of public nuisance
- protection of children from harm
- public safety

The area and it's residents are adversely affected each and every day already with problems around these. You only have to sit in Costa Coffee shop on the high street gazing out of the window and you will be surprised at the affected behaviour that you will see in any given half an hour period, and that is during the day time.

I feel that an additional gaming centre license in the area would undoubtedly add to the scale of the problems that these objectives are designed to reduce or avoid. It would make 'cleaning up' of some of the area's issues more unachievable.

Thank you for considering and including my heartfelt objection to the license to operate.

Yours sincerely

~~XXXXXXXXXX~~

~~XXXXXX~~ Berne Road

Thornton Heath

~~XXXXXX~~

From: ~~maidyling~~ [mailto: ]  
Sent: 27 February 2019 22:49  
To: LICENSING <LICENSING@croydon.gov.uk>  
Subject: Object to licensing

As a local resident I object to a Application for a adult gaming center licence.  
Admiral 91 high street, Thornton heath cr7 8ry

I object for the following reasons

prevention of crime and disorder  
prevention of public nuisance  
public safety  
protection of children from harm

My personal details are below

~~maidyling~~

~~10~~ Gillett Road ~~cr7 8ry~~

From: ~~XXXXXXXXXX~~ [mailto:~~XXXXXXXXXX~~]  
Sent: 28 February 2019 05:27  
To: LICENSING <LICENSING@croydon.gov.uk>; King, Stuart <Stuart.King@croydon.gov.uk>; Jewitt, Karen <Karen.Jewitt@croydon.gov.uk>;  
Subject: Objection: Application for a Adult Gaming Centre Licence under the Gambling Act 2005 15/02/2019

Dear council,

RE: Admiral, 91 High Street, Thornton Heath, CR7 8RY

I object to the license for the gaming machine premises on the high street and am furious they intend to go ahead despite their planning application being declined at a recent council meeting.

I am objecting to the application for a Adult Gaming Centre Licence under the Gambling Act 2005 15/02/2019 on the following grounds:

public safety

Prevention of crime and disorder

prevention of public nuisance

protection of children from harm

Please advise of the outcome.

~~XXXXXXXXXX~~

~~XXXXXXXXXX~~ Sandringham road

Thornton heath

Surrey ~~XXXXXXXXXX~~

From: ~~Redacted~~ [mailto: ]  
Sent: 02 March 2019 16:56  
To: LICENSING <LICENSING@croydon.gov.uk>  
Subject: Objection

I object to the application for license for the gaming machine premises on the premises on our high street, address below.

I object under the three licensing objectives under the Gambling Act 2005

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

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

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

- prevention of crime and disorder
- prevention of public nuisance
- public safety
- protection of children from harm

Application for a Adult Gaming Centre Licence under the Gambling Act 2005  
15/02/2019  
Admiral, 91 High Street, Thornton Heath, CR7 8RY

~~Redacted~~

~~Redacted~~ Grange Park Road

Thornton Heath

Surrey

~~Redacted~~

From: ~~Bob Perry~~ [mailto: ]  
 Sent: 13 March 2019 13:32  
 To: LICENSING <LICENSING@croydon.gov.uk>  
 Subject: Objection to ADULT GAMING CENTRE - THORNTON HEATH HIGH STREET

Hello,

I am writing to object to Admiral, 91 High Street, Thornton Heath, CR7 8RY.

The grounds for my objection are:

- (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
- (b) ensuring that gambling is conducted in a fair and open way, and
- (c) protecting children and other vulnerable persons from being harmed or exploited by gambling

We have more than 1000 signatures on the petition (online and on paper) against this gambling centre:

<https://www.change.org/p/croydon-council-planning-committee-object-to-adult-gaming-centre-on-thornton-heath-high-street>

Local news have covered it:

<https://www.thorntonheathchronicle.co.uk/hundreds-sign-petition-against-gambling-arcade-on-the-high-street/>

<https://insidecroydon.com/2019/02/08/jackpot-for-thornton-heath-campaign-as-slots-arcade-rejected/>

[https://www.mylondon.news/news/south-london-news/people-thornton-heath-dont-want-15667173?fbclid=IwAR1ZaoCyiF3T25payPbQ\\_PnnweBMAImZr9czn6mYF6oWvrFFf481lo04oLQ](https://www.mylondon.news/news/south-london-news/people-thornton-heath-dont-want-15667173?fbclid=IwAR1ZaoCyiF3T25payPbQ_PnnweBMAImZr9czn6mYF6oWvrFFf481lo04oLQ)

We don't want any more gaming parlour in Thornton Heath, no matter what they call it.

Many of the subsidiary objections are relevant in opposition now to the application for a gambling licence. They are as follows:

- The Thornton Heath ward has the third highest crime rate in Croydon with higher comparative levels of anti social behaviour, theft, criminal damage, drugs and violent and sexual offences. Source: [data.police.uk](http://data.police.uk)
- The adult gaming centre would be located in an area of high deprivation (Source: DCLG, 2015) which is associated with poor physical and mental health.
- The proposed premises are opposite a leisure centre which is regularly visited by groups of primary age children attending swimming lessons. There are two Whitehorse Manor primary schools at either end of the High Street on Whitehorse Road and Brigstock Road.

- The premises are a short distance walk from four other betting shops which already provide access to fixed odds betting terminals: William Hill X2, Paddy Power and Coral.

In addition in the reasons for refusing the planning application for change of use the Croydon Council planning officer states "The applicant has failed to demonstrate that the proposed 24 hours use would not have an adverse impact on neighbouring properties from activity and coming and goings associated with the use during more sensitive night- time hours."

For all these reasons I object.

I am part of the Thornton Heath Community Action Team who volunteer and work endlessly for this area. Many residents and I stand firmly and strongly in this matter and we don't want to see any more gambling, betting, gaming shop in Thornton Heath.

Kind regards,

~~John Green~~

● Ecclesbourne Road, ~~CR2 2222~~

From: ~~Steve Reed~~ [mailto: ]  
Sent: 11 March 2019 18:38  
To: LICENSING <LICENSING@croydon.gov.uk>  
Cc: [steve.reed.mp@parliament.uk](mailto:steve.reed.mp@parliament.uk)  
Subject: No more gambling / gaming in Thornton Heath High Street

Dear Sir / Madam,

I have just been advised by one of my neighbours that there is an application for a new gaming arcade in Thornton Heath High Street. I note that it was apparently rejected and am unaware whether or not there has been an appeal.

As a local resident (~~15~~ Farnley Road ~~SE26 2LQ~~), I would like to voice my concerns about any such businesses opening in the area.

This is a deprived area which is not going to be served by opportunities such as gambling to increase levels of deprivation. It is a bad idea for all the reasons listed in this article <https://www.thorntonheathchronicle.co.uk/hundreds-sign-petition-against-gambling-arcade-on-the-high-street/> and more. I would urge the council to adopt long-term joined up thinking and not just look at the £35K revenues from renting out the shop front, but consider the long-term damage this does to communities and the significant costs that are brought to bear by allowing people living in poverty to lose what little money they have to these dens of iniquity. Furthermore, there are many unoccupied youths and they should be encouraged into work and education, not into gaming arcades. You will end up spending more in policing, addressing anti-social behaviour and paying out benefits than any of the perceived gains from allowing this arcade / casino to materialise.

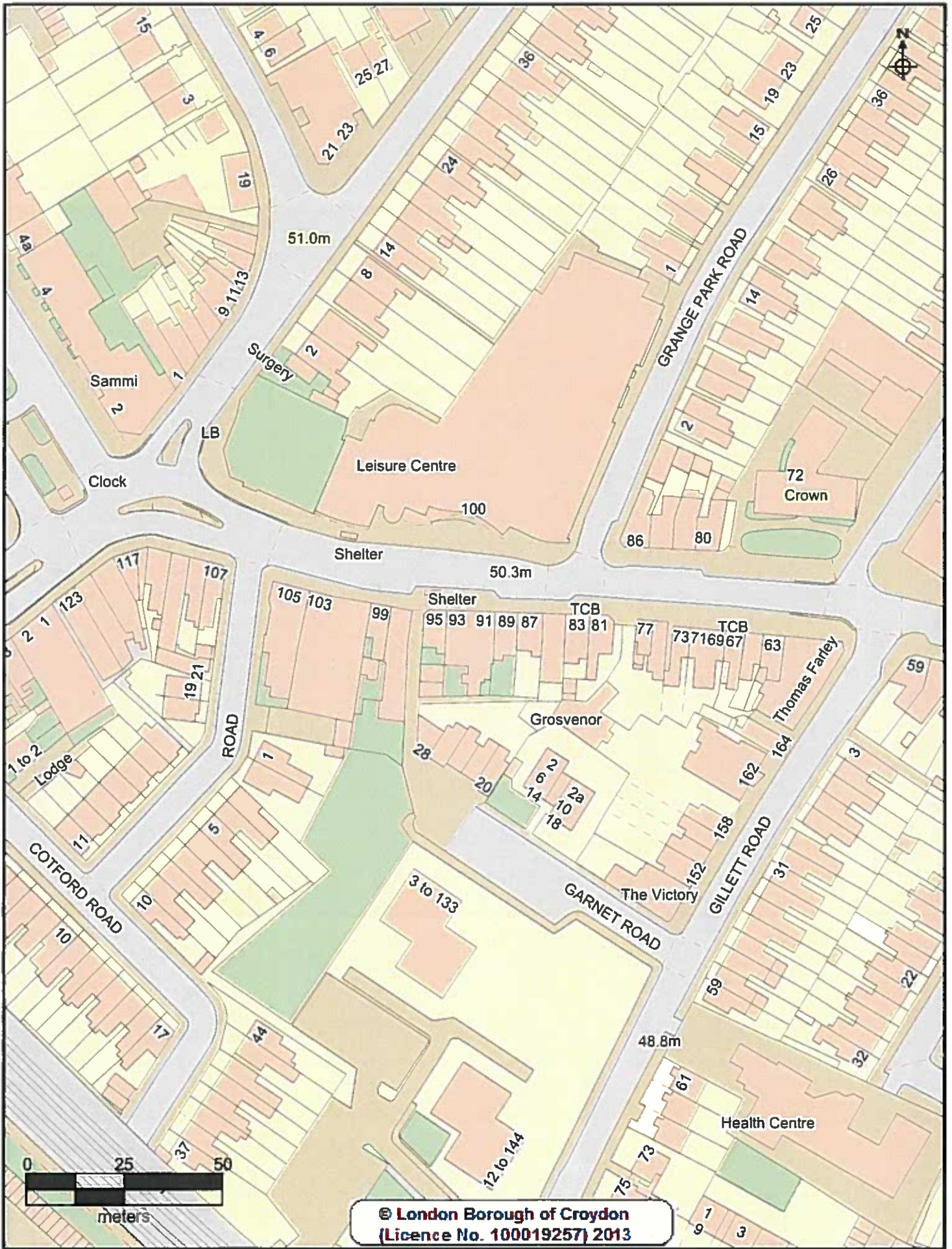
We will all benefit far more from encouraging employment opportunities that benefit the community and constructive activities for the local youth. You are starting to attract more professionals (which means money) into the area – don't mess it up with this and blow opportunities to improve the area for ALL of its inhabitants.

If there are updates, I would be grateful if you could please advise how / where I might follow this initiative.

Many thanks for your consideration.

Kind regards,

~~Steve Reed~~  
15 Farnley Road  
London ~~SE26 2LQ~~



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X = 91 HIGH STREET