

Licensing Sub-Committee Agenda



To: Councillors Margaret Bird, Sherwan Chowdhury and Chris Clark

A meeting of the **Licensing Sub-Committee** which you are hereby summoned to attend, will be held on **Thursday, 22 October 2020 at 10.30 am. This meeting is being held remotely; to view the meeting, please click [here](#).**

JACQUELINE HARRIS BAKER
Council Solicitor and Monitoring Officer
London Borough of Croydon
Bernard Weatherill House
8 Mint Walk, Croydon CR0 1EA

Thomas Downs
020 8726 6000 x86166
thomas.downs@croydon.gov.uk
www.croydon.gov.uk/meetings
Wednesday, 14 October 2020

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If you require any assistance, please contact Thomas Downs
020 8726 6000 x86166 as detailed above.

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 an Adult Gaming Centre Premises Licence at 82 Westow Hill, Upper Norwood (Pages 3 - 110)

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

REPORT TO:	LICENSING SUB COMMITTEE Thursday 22 October 2020
SUBJECT:	GAMBLING ACT 2005 – APPLICATION FOR PREMISES LICENCE – ADULT GAMING CENTRE
LEAD OFFICER:	Executive Director, Place Department
CABINET MEMBER:	Councillor Hamida Ali, Cabinet Member for Safer Croydon & Communities
WARDS:	Crystal Palace and Upper Norwood
CORPORATE PRIORITY/POLICY CONTEXT:	
This report is specific to this application and has no implications on the Council’s Corporate Policies.	
FINANCIAL SUMMARY:	
This application is being processed as part of normal duties carried out by the Department with no additional costs involved.	
FORWARD PLAN KEY DECISION REFERENCE NO.: N/A	

For general release

1.	RECOMMENDATIONS
1.1	The Sub-Committee is asked to determine whether to grant the application for an Adult Gaming Centre Premises Licence at 82 Westow Hill, Upper Norwood, SE19 1SB.

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 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

4.1 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.

4.2 The effect of the decision

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

4.3 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.

4.4 Options

The options available are: to grant the application, to vary the application, with or without further conditions, or to refuse the application.

4.5 Savings/ future efficiencies

None identified.

4.6 (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.

6.4 (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.

CONTACT OFFICER: Michael Goddard, Head of Public Protection and Licensing, Place Department, ext. 61838

BACKGROUND DOCUMENTS: None

APPENDICES:

Appendix A (Pages 7-14): Summary, Licensing Objectives & Policy

Appendix A1 (Page 15): Gambling Commission Guidance to Local Authorities - Summary of machine provisions by premises

Appendix A2 (Page 16): Gambling Commission Guidance to Local Authorities - Summary of gaming machine categories and entitlements

Appendix A3 (Pages 17-21): Gambling Commission Guidance to Local Authorities - Premises License Conditions

Appendix A4 (Pages 22-23): Gambling Commission Guidance to Local Authorities - Adult Gaming Centres

Appendix A5 (Pages 24-41): Application for a Premises License under the Gambling Act 2005

Appendix A6 (Pages 42-100): Area Profile of Crystal Palace

Appendix A7 (Pages 101-108): Interested Parties Representations

Appendix A8 (Pages 109): Ordinance Survey Map

1. The Application

This report concerns an application made under section 159 of the Gambling Act 2005 (the Act) by Reels Casino Slots Limited for a Premises Licence (Adult Gaming Centre) at 82 Westow Hill, Upper Norwood, SE19 1SB.

- 1.1 An application for a premises licence may only be made by a person who:
- Holds an operating licence which authorises him to carry on the activity in respect of which the premises licence is sought and
 - Who has a right to occupy the premises to which the application relates.
- 1.3 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. During discussions with the Police Licensing Officer in the consultation period on the application, the applicant has confirmed that the proposed operating times for licence will be 1000 hours to 2300 hours daily, except Christmas Day.
- 1.9 Attached at Appendix A6 is a copy of a Local Area Profile which was produced during the consultation period on the application at the request of one of the interested parties who has made representations.

2. Relevant representations

- 2.1 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 a copy of the Local Area Profile that was produced. The applicant and those making representations have been made aware of the date, time and location of the Sub Committee hearing.

3. Policy Considerations

- 3.1 Under the terms of the Act, the Council has published a Statement of Principles. This is available on the Council website at www.croydon.gov.uk. Hard copies are also available from the Council's 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

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 ¹				Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4		No limit on category C or D machines	
Adult gaming centre ²				Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4		No limit on category C or D machines	
Licensed family entertainment centre ³						No limit on category C or D machines	
Family entertainment centre (with permit) ³						No limit on category D machines	
Clubs or miners' welfare institute (with permits) ⁴					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	

¹Bingo 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 eight¹⁰⁴ 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

² 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.

¹⁰⁴ The Gambling Act 2005 (Gaming Machines in Bingo Premises) Order 2009



³ 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.

⁴ 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.

⁵ 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 so²¹.
- 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'.

²¹ 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 2007.²²
- 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.

²² 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 machines⁶⁶.
- 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.

⁶⁶ 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.

**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 you answer "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):

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

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

6. Name of applicant business or organisation: Reels Casino Slots Limited

7. The applicant's registered or principal address: 742 Green Lane DAGENHAM

Postcode: RM8 1YX

8(a) The number of the applicant's operating licence (as given in the operating licence):
000-43204-N-322207-003

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

Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known): Reels Casino Slots

11. Address of the premises (or, if none, give a description of the premises and their location): 82 Westow Hill Upper Norwood

Postcode: SE19 1SB

12. Telephone number at premises (if known):

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

The arcade is to be located on the ground floor of a three story building

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

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

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

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): *(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? No

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

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

The applicant has the right to occupy the premises under the terms of a lease. It operates several other arcades in north London and is a member of the industry trade association Bacta and will use its tool kit to operate the Premises. The Applicant has policies and procedures in place to ensure the premises are operated compliantly and uses a multi-operator self exclusion scheme operated by Bacta

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. X
- I/We confirm that the applicant(s) have the right to occupy the premises. X
- Checklist:
- Payment of the appropriate fee has been made/is enclosed X
 - A plan of the premises is enclosed X
 - I/We understand that if the above requirements are not complied with the application may be rejected. X
 - I/We understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities X

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: Debbie Bollard

Date 16 August 2020

Capacity: Licensing Consultant

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

Signature:

Print Name:

Date:

Capacity:

Part 8 – Contact Details

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

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted: 01526 341162

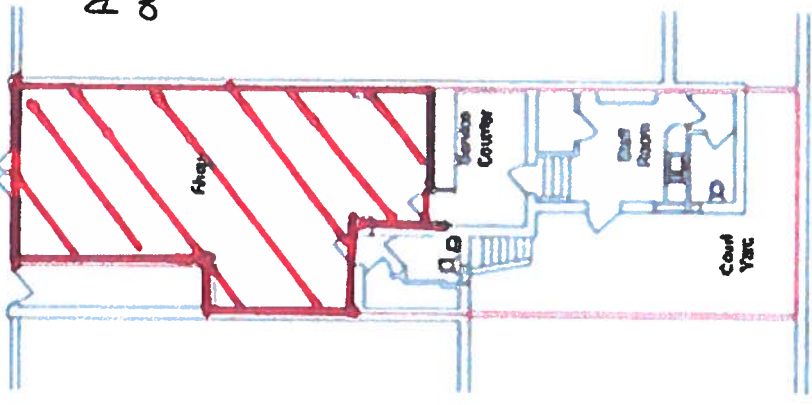
24. Postal addresses for correspondence associated with this application: Hough 7 Billard Ltd 5 Tarleton Avenue Woodhall Spa LN10 6SE

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: Debbie@houghandbollard.co.uk



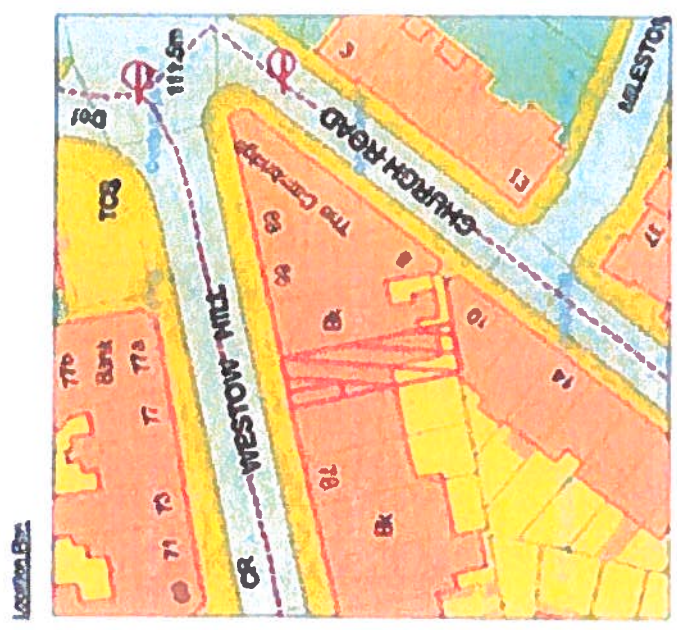
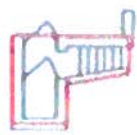
Ground Floor
ADRE LANE

Garage



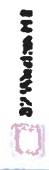
AGC licensed area hatched Red

Basement Level



NOTES

Key



1:1000

Location
37 Weston Mill
London
SE18 1SD

Scale 1:200 6 M
0 2M 4M

Date: 27-06-14
Drawn By: JAM/CRF

Page No: 11

RECEIVED 14 AUG 2020 LOCAL GAMBLING RISK ASSESSMENT REPORT

**Premises**

Premises Name:	REELS CASINO SLOTS LTD
Premises Address:	82 WESTOW HILL
Premises Post Code:	SE19 1SB
Premises Licence Number:	n/a
Category of Premises:	ADULT GAMING CENTRE

Company

Operating Company:	REELS CASINO SLOTS LTD
Operating Licence Number:	000-043204-N-322207-001

Assessment Writer

Name of Person Writing this Assessment:	ALAN KALLAS
Position within Company or Name of Authorised Agent:	DIRECTOR
Date that Original Assessment was Written	05 AUGUST 2020

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

- 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.

LOCAL GAMBLING RISK ASSESSMENT REPORT

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.

Local Area Profile

The AGC is located on a main through road which makes up a small retail and residential area. There are a wide range of shops in the area including DIY, betting offices, fast food outlets, coffee shops, clothing and boutique stores and supermarkets. There are 8 Public houses in the area, and a cocktail lounge with late opening at weekends (4am) There is also a large number of professional services in the area including solicitors and accountants. Numerous bus routes run through Westow Hill and there is also a nearby railway station (Crystal Palace) The nearest school is ¼ mile away.

The building is square shaped and measures approx. 800sq ft. The front entrance is immediately off the main Rd, and there is also a small rear garden, but has no access from the outside. There are residential facilities above the shop. The only facilities offered will be gambling in the form of circa 40 gaming machines of category B3, C and D.

The premises were previously a betting shop operated by Ladbrokes and has now been closed for 12 months.

There are no specific local problems with crime or anti-social behaviour. The area is lively in the evening, mainly due to the number of restaurants and public houses.

LOCAL GAMBLING RISK ASSESSMENT REPORT

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.

Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Children entering site	C	Very low	SEVERE TO BOTH PARTIES	Interior design	Location of counter, staff walking around the shop, machine positioning, viewing CCTV	Aug 2020
				Exterior design	2 CCTV cameras on front entrance linked to 2 monitors in the shop. Door buzzer system.	Aug 2020
				systems	Think 21 posters, staff training provided by Hough & bollard, BACTA handbook posters in shop, leaflets in shop, Under 18 labels on all machines. All policies monitored fortnightly.	Aug 2020
Failure to deal with customer complaints about gambling	C	LOW	Moderate to business Severe to customer	Physical	We only use licensed machine suppliers Regular engineer visits to maintain machines	June 2020
Out of control gambling by vulnerable persons	C	Low	Moderate to business Severe to vulnerable	Systems	Customer interaction log & procedures adhered to. Regular talking to customers encouraged by management	June 2020
				Interior design	14 CCTV Cameras All machines clearly visible from cash desk	June 2020

LOCAL GAMBLING RISK ASSESSMENT REPORT

Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Failure to deal with com making complaints about the outcome of gambling (continued)	C	LOW	Moderate to business Severe to customer	System	*Complaints procedure & forms available on premises *Quarterly staff training on company policy ADR with BACTA	June 2020
Failure to recognise signs Associated with problem gambling or substantial changes in gambling style.	B	Low	Severe to Business Severe to customer	Interior design Systems	Monitoring of player behaviour. Machine play monitored via TITO system Positioning of CCTV camera	
Failure to properly administer The self-exclusion process and maintain its effectiveness, thereafter, including breaches And reinstatements	C	Low	Severe to business Severe to customer	Physical Interior Systems	CCTV monitoring Daily monitoring of online BACTA self-exclusion website Keeping a line of vision from cash desk Staff use camera phones Forms available On BACTA Self Exclusion scheme Photographs of Self-Excluders on notice board	
Failure to identify attempts to launder money on the premises	C	Very Low	Severe to business low to customer	Interior Physical Systems	Well positioned CCTV, and staff awareness Regular inspection of change machine and machine note income BACTA literature, LCCP literature, awareness to report to NCA Monitoring of TITO system	June 2020
Poor security increasing vulnerability to crime.	B	Low	Severe to business and customer	Physical	16 camera Intruder alarm maintained regularly Fog Bandit Protection system	June 2020

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LOCAL GAMBLING RISK ASSESSMENT REPORT

				Panic alarms in office and cash desk Remote accessible CCTV system TO BE INSTALLED PRIOR TO OPENING	June 2020
			Exterior Design	2 CCTV cameras pointed onto outside road TO BE INSTALLED PRIOR TO OPENING	June 2020
			Systems	2 Staff working in evenings Local community police make regular visits, 2 safes on premises, staff hold minimum float, no machine keys left in shop, regular BACTA bulletins on staff notice board	June 2020
Awareness of heightened local crime in the local area.			Systems	Low crime area	June 2020
Awareness of student learning facilities (schools and college) in the local area.			Systems		June 2020
Awareness of residential facilities for the most vulnerable in the local area.			Systems	None in area	
Awareness of gambling care agencies in the local area.				None in area	June 2020

Use continuation pages as required.

AS

RECEIVED 14 AUG 2020

REELS CASINO SLOTS LIMITED
COMPLIANCE POLICIES

The Company and its Directors understand the set out in the Licensing Codes and Conditions of Practice (LCCPs) and will ensure it complies with any relevant social responsibility provision of a code of practice.

The Company is currently a small-scale operator; in the event that an individual begins or ceases to occupy a qualifying position the Company will within 28 days apply to the Commission for an amendment to its Schedule X. The Directors will also report:-

- any Key Events as listed in the Licence Condition 15.2.1 to the Gambling Commission within 5 working days of becoming aware of the event.
- any other matters listed in the Licence Condition 15.2.2 as soon as reasonably practicable.

The Directors acknowledges the Company's duty as set out in Licence Code 15.3.1 and will, provide the Gambling Commission with any information it requests in Annual Regulatory returns or otherwise pertaining to the use of facilities provided including such as the type of gambling activities provided by the licensee, the numbers of staff the Company employs, its policies in relation to, and the experience of, problem gambling

The Directors will ensure that they and the Company work with the Gambling Commission in an open and cooperative way and will disclose anything that the Gambling Commission would reasonably need to be aware of in exercising its regulatory functions. They will disclose to the Commission anything that is likely to have a material impact on the Company's business or ability to conduct licensed activities compliantly. The Directors will provide the Gambling Commission with any information that they suspect may relate to the commission of an offence under the Gambling Act 2005, including an offence resulting in a breach of a licence condition or a code of practice provision having the effect of a licence condition.

PROTECTION OF BUSINESS FROM BEING A SOURCE OF CRIME OR DISORDER

1. The Directors understands their obligations under the Proceeds of Crime Act 2002 and the Terrorism Act 2000 and is aware that there is a risk that the business might be used for money laundering and terrorist financing. They will therefore from time to time and at least annually conduct risk assessments; additional risk assessments may be conducted when there is an introduction of a new product or technology or method of payment. Where a new risk is identified the Directors will review the Company's policies and procedures and make any necessary amendments and ensure that they are implemented and that there is additional staff training so they understand the changes.
2. The Company will make a report to NCA in accordance with its Money Laundering Policy if it is suspected that someone is trying to use the business as a way of laundering money

3. Staff are trained to be vigilant at all times for anyone carrying out any suspicious activities on any Company Premises including any attempts by third parties to use the business for any illegal activities including for the purpose of money laundering. Staff are trained on how to identify counterfeit money using scanners and other detection equipment capable of identifying counterfeit money. Staff are required to inform the Directors immediately if a detection is made and then a report would be made to the appropriate authorities.
4. Staff are trained to identify and refuse entry to anyone they suspect of being under the influence of alcohol or drugs. If the individual will not leave the premises then the police may be called for assistance and the incident recorded in the incident log with a view to it being included in the Company's annual regulatory return
5. Staff are trained to report anyone they suspect of trying to cheat to the Directors who will make a report to the appropriate authorities. In the event that the police are involved the matter will be recorded in the incident log with a view to it being included in the Company's annual regulatory return.
6. Staff are trained to make a report to a Directors if they suspect another operator or a staff member is operating in an illegal manner and in particular committing an offence under the Gambling Act 2005. The Company will then make a report to the appropriate authority including the Gambling Commission and if necessary take disciplinary action against any member of staff involved. In the event that the police are involved the matter will be recorded in the incident log with a view to it being included in the Company's annual regulatory return.
7. The Company audits transactions and accounts and the Company makes regular checks for any suspicious activities.
8. The Company seeks to prevent money lending between customers. Staff are trained to be alert to and identify any attempts by customers to lend money to one another and to report instances of substantial lending to the Directors. Customers will be asked to cease the practice and in certain circumstances they may be excluded from the premises if the behaviour continues.
9. The Company does not provide credit in connection with gambling nor participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling. Staff are also trained to prevent collusion between customers and staff and disciplinary action will be taken against any member of staff involved.
10. The Company uses CCTV and has staff monitoring its equipment to prevent crime and criminal misuse.
11. The Company carries out due diligence checks on companies it deals with to ensure they are trustworthy and reputable and comply with any industry regulations and standards. If the Company has concerns about the conduct of a third party that it does business with it will

where appropriate terminate any contract immediately.

12. The Company complies with the codes of practice set by other organisations including BACTA.
13. The Company only uses gaming equipment supplied by companies that hold Operating Licences and regularly checks to ensure that the equipment complies with the Gambling Commission's technical standards. The Company can make the following gaming machines available for use in its AGCs:-
 - Category B3 – max stake £2 max prize £500
 - Category B4 – max stake £2 max prize £400
 - Category C – max stake £1 max prize £100
 - Category D – max stake 10p max prize £5

The Company will ensure that it only operates 1 category B3/4 machine for every 4 category C/D machine unless it has premises with grandfather rights when it can operate a maximum of 4 category B3/4 machines. Where applicable, in order to maintain the 20% rule staff are trained to switch off a category B3/4 machine in the event that a category C/D machines becomes unserviceable.

14. The Directors is responsible for the emptying machines and handling the cash which may be delegated to the Senior Manager. The keys are kept securely in the arcade office with access limited to management only.

PROTECTION OF CHILDREN AND VULNERABLE PEOPLE POLICY

The Company recognises its responsibility and obligation to protect children and other vulnerable persons from being harmed or exploited by gambling as is required by the licensing objectives and the LCCPs.

1. It is an offence for any person who is under 18 years of age to be permitted entry to any AGC premises. Staff are trained as part of their induction that they are under no circumstances to permit access to any AGC by anyone who appears to be under the age of 21 and who cannot prove that they are over the age of 18. Notices are displayed at the entry to AGC premises stating that no one under the age of 18 is permitted to enter or gamble.
2. The Company ensures that it does not offer gambling in a style that is intended to or likely to appeal to anyone under 18.
3. The Company has a think 21 policy and anyone suspected of being under age or believed to be under 21 is asked to produce valid photographic ID as proof of age which includes their date of birth and has no visible signs of tampering or reproduction. Anyone found to be or unable to prove their age will be asked to leave the AGC Premises or refused admission. Stakes will be returned to anyone who is not able to prove their age but they will not be

allowed to keep any prize unless they played on a category D gaming machine. Forged ID may be retained and handed to the police.

4. In the event that a person under 18 repeatedly attempts to gamble at Company premises staff will offer that person information on problem gambling and issue an oral warning that further attempts will be reported to the police. In the event that the said person continues to try to enter the premises for the purpose of gambling the incident will be reported to the police, recorded in the incident log and recorded in the Company's annual regulatory return.
5. If the Company identifies an adult who is complicit in encouraging or assisting someone under the age of 18 to enter and gamble in the premises a Directors will issue a warning and may consider excluding the adult from Company premises on a temporary or permanent basis.
6. An entry of any incident will be recorded in the incident log kept at the Premises and reported to the Gambling Commission on an annual basis.

7. It is an offence for any child (under-16s) and young persons (those aged 16 and 17) employed by the Company to be engaged, or permitted to be engaged in:
 - Providing facilities for gambling.
 - Performing a function in connection with a gaming machine at any time.
 - Carrying out any other function in an AGC premises whilst any gambling activity is being carried on in reliance on the premises licence.

All staff, including those aged under 18, employed by the Company have been trained about the laws relating to access to gambling by anyone under the age of 18 and which forms part of the induction training for all staff. It is strict Company policy that gaming machines sited at any Company Premises are turned off if anyone under the age of 18 is working on the premises outside the hours when the premises are open for business.

8. The Company understands its obligation under section 10 of the LCCPs as amended from time to time and will carry out a local risk assessment for each premise that it operates. Such local risk assessment will be reviewed from time to time if the Company identifies any changes in circumstances. The Company will also share its local risk assessment with the local authority when applying for a new premises licence or when applying to vary or transfer an existing premises licence.
9. Staff are trained to identify persons who are not capable of making an informed decision about gambling, and to refuse them access to the premises or to ask them to leave and to record the incident in the incident log kept at the Premises.
10. The Company has posters sited in highly visible places in its arcades which provide information about the dangers of gambling addiction and give contact details of how to contact GAMCARE.
11. The Company has a separate policy for dealing with staff who develop a gambling problem.

FAIR AND OPEN GAMBLING POLICY

1. The Company offers gambling on fair and open terms; none of the terms on which gambling is offered are unfair terms within the meaning of the Consumer Rights Act 2015 and, where applicable, meet the reasonableness test under the Unfair Contracts Act 1977. Terms of play are benchmarked against these legal requirements
2. Staff are trained on induction that it is essential that the Company is seen to be operating in a fair and open way and that any queries should be immediately referred to the management.
3. Notices are displayed advising customers where they can find the rules and conditions of the gambling facilities provided and how to make a complaint. Any changes will be notified to customers through additional signage prior to any change taking place.
4. Staff are trained to log all complaints in the log at the Premises and to report them to the Company which will attempt to resolve all disputes and if this cannot be done within 8 weeks the complaint will be referred to BACTA for ADR.
5. All records and reports, including the outcome of each dispute, are submitted annually to the Gambling Commission.
6. The Company carries sufficient funds to ensure that there are sufficient resources to cover all gambling transactions and financial obligations.

ENSURING THE PROMOTION OF SOCIAL RESPONSIBILITY IN GAMBLING

The Company understands its obligations to ensure the promotion of social responsibility in gambling as set out in the LCCPs which may be amended from time to time

1. Staff are trained to identify anyone who appears to be gambling beyond their means and that if they have concerns about a customer's behaviour such as agitation, distress, intimidation or aggression that may indicate problem gambling, staff should caution the customer against continuing to gamble. Staff are also trained to be aware of regular customers, how much they usually spend, how often they usually gamble and to discuss with them any drastic changes in their gambling behaviour and offer advice on where to seek help if they feel it is needed. Such interaction will be recorded in the Customer interaction log, as well as where an interaction is ruled out, the reasons why and whether interaction is initiated at a later date. This information will then be recorded in the Company's annual

regulatory returns. Where appropriate staff will refer the matter to a Directors if there are continuing concerns about a particular customer's behaviour.

2. Information about how to gamble responsibly including how to monitor and control gambling such as self-exclusion, restricting the time spent gambling or the amount of money they can spend is made readily available to customers
3. Information about how to access further help and advice for problem gambling is made readily available to all customers. The information is available in areas where gambling facilities are provided as well as in locations where customers can obtain it discreetly. Such information is available in leaflet form so it can be taken away and details of online support are also made available so information can be accessed via the Internet. If the Company identifies that there are a number of foreign speaking customers using the arcade then the same information will where reasonably possible be provided in those languages.
4. The Company understands that whilst most customers are able to enjoy and control their gambling, it has a duty of care to those who cannot. The Company therefore provides a self-exclusion facility for clients upon their request for a fixed period of time. Customers will be given an explanation, where possible in private, about the consequences of the self-exclusion and encouraged to self-exclude from other local sites. No cooling off period is available but a customer may go away to consider the self-exclusion further and then initiate self-exclusion at a later date. Self-exclusion will have immediate effect upon a customer making a formal request and will last a minimum of 6 months but no more than 12 months and can be extended upon request by periods of a further 6 months.

A Self-Exclusion Request form will be completed and the customer asked to assist by providing an up-to-date photograph showing a good likeness. Customers are also able to self-exclude without having to enter the arcade. A copy of the self-exclusion form will be given to the customer together with information on counselling and support services; a copy will be retained on site for the duration of the exclusion and a further 6 months.

An entry is made in the arcade's self-exclusion log and recorded on the Company's next annual regulatory return. The customer's details will be removed from any marketing data base to ensure that no marketing materials are sent to the customer during the period of self-exclusion. The self-exclusion will only end at the end of the agreed period if the customer takes positive action to end it; the customer will be given a 1-day 'cooling off' period before being allowed access to the arcade. Staff are trained not to permit entry to the arcade to anyone during their self-exclusion period and to immediately remove any self-excluded customer from the arcade.

5. The Company is also a participant in the BACTA multi-site self-exclusion scheme and customers self-excluding from the arcade will also be informed of the scheme and encouraged to participate.
6. The Company makes an annual contribution to research into socially responsible gambling through Gamcare or Gamble Aware.

7. The Company ensures that any advertising is legal, decent and honest and complies with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) and with the Gambling Industry Code for Socially Responsible Advertising. It also complies with the requirements as to digital advertising set out in section 16 of the LCCPs which may be amended from time to time.
8. The Company ensures that any promotions are socially responsible and do not encourage excessive gambling or suggest that gambling is a way of getting out of financial difficulties. The terms and conditions of any scheme is clearly set out and made readily available to customers.

IMPLEMENTING POLICIES AND PROCEDURES

1. The Company understands its obligations to notify the Gambling Commission of key events as listed at sections 15.2 of the LCCPs which may be amended from time to time.
2. The Company acknowledges its obligation to file annual regulatory returns in accordance with section 15.3 of the LCCPs which may be amended from time to time.
3. Staff are given training on induction as to the Company's policies and they are asked to sign a log to confirm their understanding. Further individual training is given if there has been a breach of any policy and/or when felt necessary to ensure staff are kept up to date with legislation and regulatory requirements.
4. The Company acknowledges its obligation to ensure that its staff co-operate with any Gambling Commission's Enforcement Officers and that they are made aware of those officers' rights of entry to premises in order to carry out their compliance function.
5. Staff training has been undertaken to ensure awareness of this policy of co-operation and to ensure compliance with our obligation. Senior management will be informed immediately a Gambling Commission enforcement officer properly identifies himself on the premises, and will attend the officer without undue delay.
6. On request, the Company will provide the Gambling Commission with any information the Commission requests about the use of facilities provided including such as the type of gambling activities provided by the licensee, the numbers of staff the Company employs, its policies in relation to, and experience of, problem gambling.
7. The Company will also provide the Gambling Commission with any information that they suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a LCCP provision having the effect of a licence condition.

REVIEWING AND ASSESSING POLICIES AND PROCEDURES

1. The Directors keeps up-to-date with the gambling industry and changes to LCCPs via Coinslot and similar publications as well as regular visits to the Gambling Commission website. They will also be subscribed to the Gambling Commission's fortnightly E-Bulletin.
2. The Directors will be responsible for reviewing the policies on an annual basis to ensure that they are still compliant and meet with the LCCP. They will put in place any necessary measures required to changes it policies and will arrange for any further staff training necessary.
3. The Directors will review the policies at any time that there is found to have been a breach of compliance and will put in place any necessary measures to prevent a further breach and will arrange for any further staff training necessary.
4. Staff will be constantly monitored to ensure they have understood the training.

Area Profile of Crystal Palace

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 and Ward Information

Crystal Palace lies within the Crystal Palace and Upper Norwood electoral Ward in the borough of Croydon and is in the parliamentary constituency of Croydon North. Attached at Annex 1 are reports on the Ward from the Croydon Observatory. This provides information on Population; Economy; Housing; Children and Young People; Crime; Deprivation; Health and; Environment within the Ward. It comprises an overview of the Ward and then provides more in depth detail about crime within the Ward and then more localised information on the above matters as they relate to the specific area of the Ward that contains the Crystal Palace Triangle, that being the area bordered by Westow Street, Westow Hill and Church Road, SE19.

The Ward is a mix of commercial and residential properties and the majority of the commercial activity in the area is concentrated on Church Road, Westow Street and Westow Hill. These are mainly independent shops, a large supermarket on Westow Street, restaurants, cafes and pubs and this area has a vibrant evening economy. There is currently one licensed gambling premises in the area, a betting shop on Westow Street.

The Ward borders the boroughs of Lambeth, Southwark and Bromley. There is one licensed gambling premises in the adjoining Gipsy Hill Ward in LB Lambeth (a betting shop) though it is not on Westow Hill, rather further in to the Ward. There are no licensed gambling premises nearby in LB Southwark or LB Bromley.

Transport

Westow Hill is well served by public transport, with several buses to many parts of London and there are overground train stations at Gipsy Hill and Crystal Palace.

Crime

Statistics on crime across the Ward are included at Annex 1. In addition, bespoke statistics on crime have been prepared using SE19 1SB as the centre point and drawing a 500 metre radius from that location. Those figures cover two six month periods, 1 April to 30 September 2019 and 1 October 2019 to 31 March 2020. Those time periods were chosen in order to more accurately reflect the position in the area,

as they pre date the onset of the covid-19 lockdown. Those statistics are attached at Annex 4a* and 4b (illustration) respectively.

*The term CCHI shown in one of the columns in the table at 4a denotes the Cambridge Crime Harm Index which is a method used in crime data analysis which provides more of an insight into the seriousness of crime by measuring the degree of harm being committed.

Education

The closest primary schools to SE19 1SB are –

Paxton Primary School
Woodland Road (Lambeth)
0.17 miles

Rockmount Primary
Chevening Road, SE19 (Croydon)
0.95 km

All Saint's CofE Primary School
Upper Beulah Hill, SE19 (Croydon)
0.99 km

The closest secondary schools are –

Harris City Academy Crystal Palace
Maberley Road, SE19 (Croydon)
1.01 km

Virgo Fidelis Convent Senior School
147 Central Hill, SE19 (Croydon)
1.11 km

Harris Academy Upper Norwood
Spurgeon Road, SE19 (Croydon)
1.27 km

Accommodation

The area has established housing stock. There are two large social housing developments, on the LB Lambeth side of Central Hill. Most dwellings on Westow Hill are situated above commercial properties. Located 0.6 miles away from SE19 1SB (in LB Croydon area) is an 80 bed hostel for young people aged 18-30 years.

AG/1



QUICK PROFILE

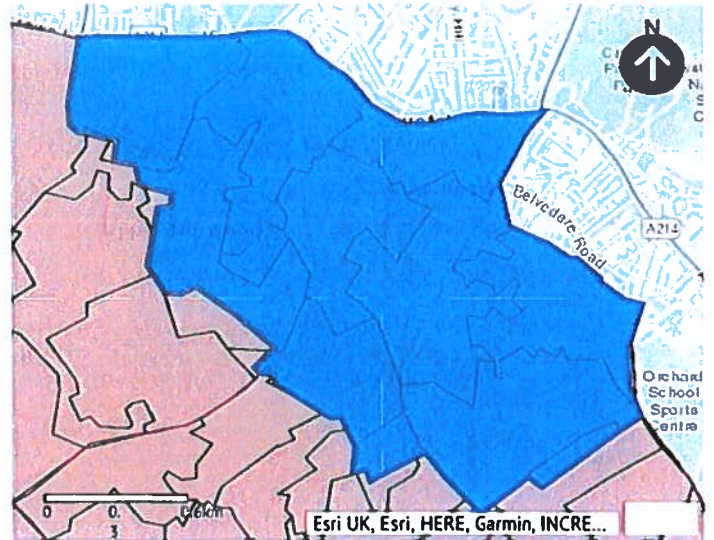
Overview

Overview report

Crystal Palace & Upper Norwood

This report shows key statistics for the area broken by [population](#), [economy](#), [housing](#), [children & young people](#), [crime](#), [deprivation](#), [health](#) and [environment](#).

The adjacent map shows the location of Crystal Palace & Upper Norwood.

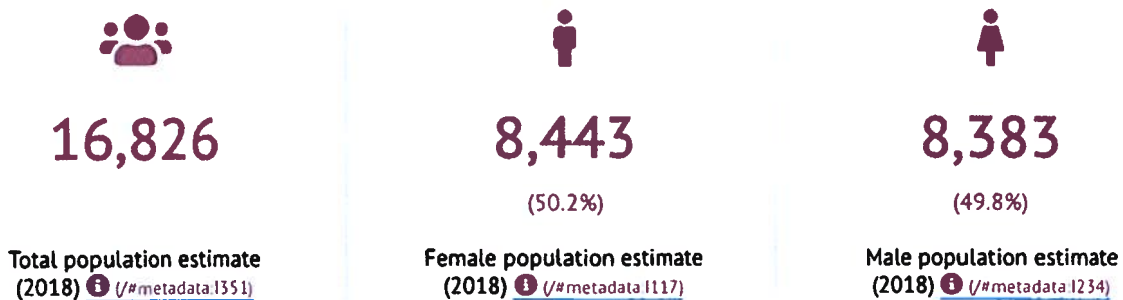


Population | Crystal Palace & Upper Norwood

It is essential to understand population size and characteristics in order to effectively plan and deliver services such as education, transport and healthcare. This section displays the latest population estimates and projections for Crystal Palace & Upper Norwood.

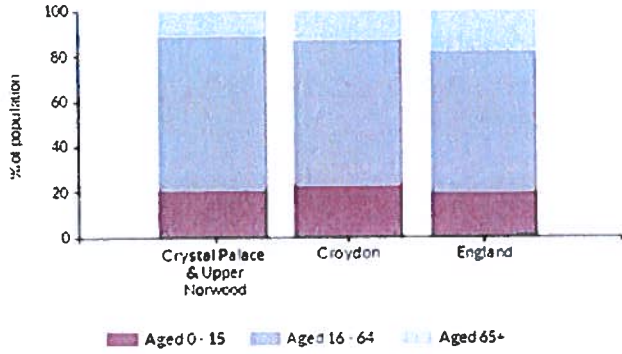
Population estimates are produced using a variety of data sources and statistical models, including some statistical disclosure control methods, and small estimates should not be taken to refer to particular individuals. The estimated resident population of an area includes all those people who usually live there, regardless of nationality. Arriving international migrants are included in the usually resident population if they remain in the UK for at least a year. Emigrants are excluded if they remain outside the UK for at least a year. Armed forces stationed outside of the UK are excluded. Students are taken to be usually resident at their term time address.

Population at a glance...



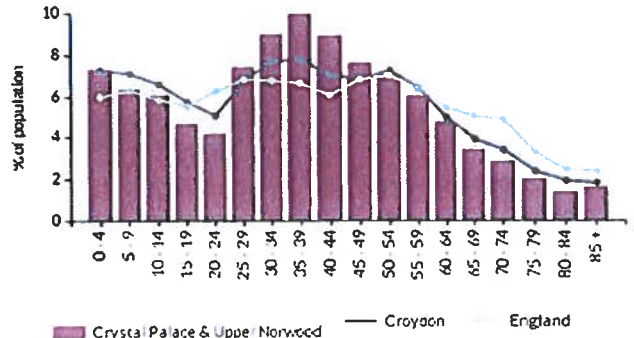
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Estimates by broad age group, all persons



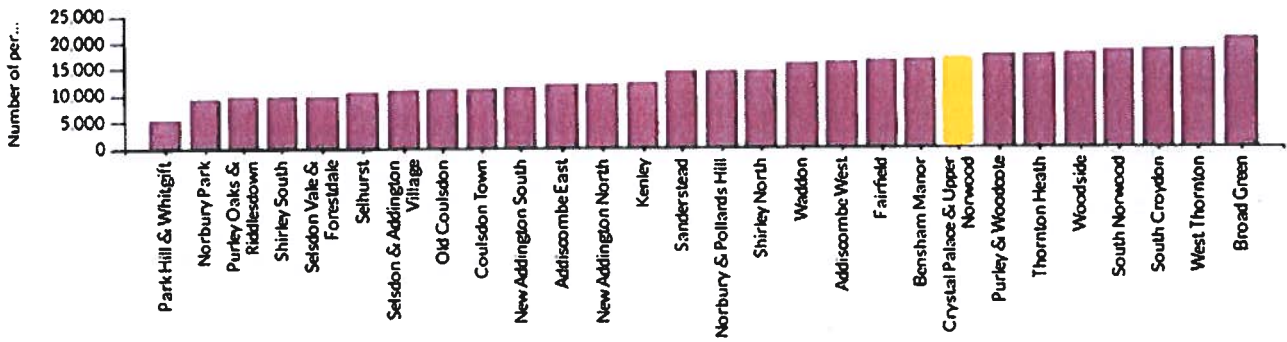
Date 2018 Source ONS

Estimates by 5-year age group, all persons



Date 2018 Source ONS

Number of usual residents by area



Date: 2018 Source: ONS

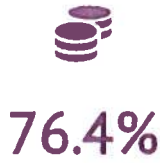
[Top](#)

AG / A1

Economy | Crystal Palace & Upper Norwood

Many factors play a part in the success of a local economy, including natural resources, a workforce with skills, quality of infrastructure, strong linkages with wider economies and successful distribution of wealth. This section displays data about the labour market in Crystal Palace & Upper Norwood and includes measures of overall economic activity and levels of worklessness.

Economy at a glance...



Economically active population (2011) [📊 /#metadata:11389](#)

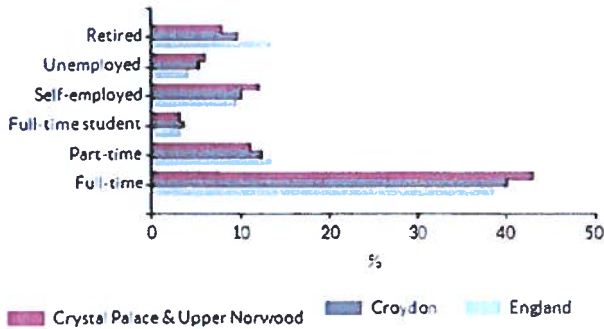


Economically active males (2011) [📊 /#metadata:11425](#)



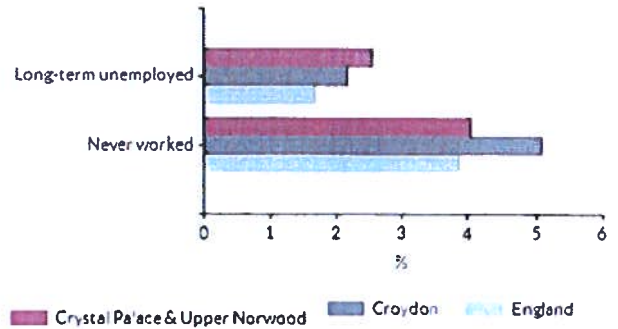
Economically active females (2011) [📊 /#metadata:11461](#)

Economic activity by type



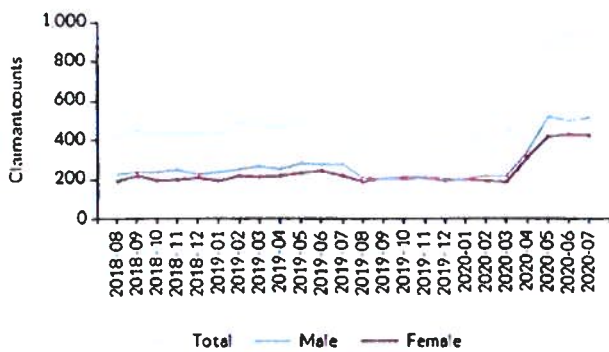
Source: ONS Census 2011

Never worked and long-term unemployment



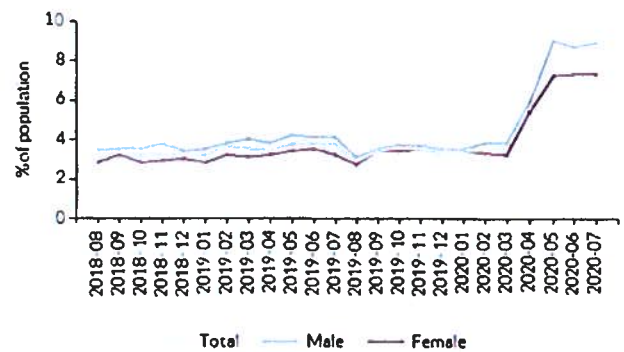
Source: ONS Census 2011

Claimant count, persons aged 16+



Source: ONS

Claimant rate, persons aged 16+



Source: ONS

[Top](#)

Housing | Crystal Palace & Upper Norwood

Information on housing and households allows us to identify areas where people may be at risk of social exclusion, due to the type and condition of their housing or their household structure. This section displays data on the type and tenure of dwellings as well as the condition of housing in Crystal Palace & Upper Norwood.

Housing at a glance...



7,111

Number of households (2011) [\[i\]](#) [\[v/#metadata/11216\]](#)



N/A

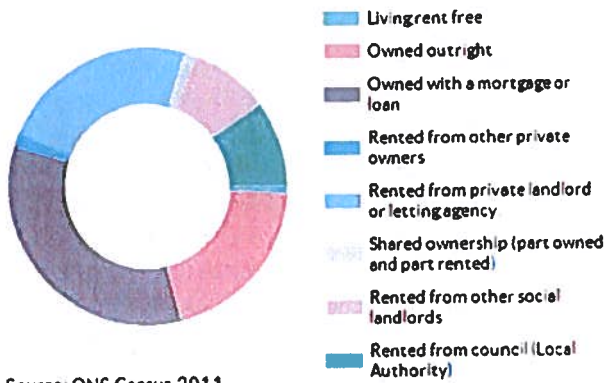
Average household size (2011) [\[i\]](#) [\[v/#metadata/120777\]](#)



9.1%

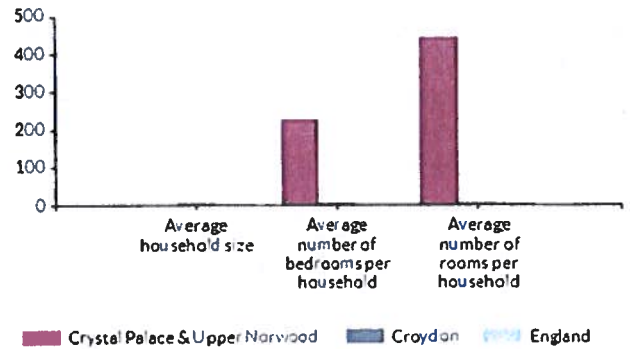
Households that are overcrowded (2011) [\[i\]](#) [\[v/#metadata/11195\]](#)

Property ownership



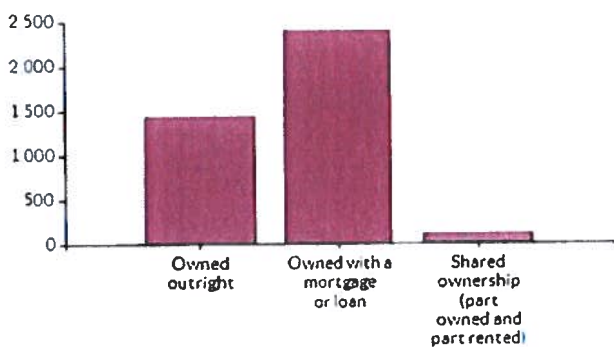
Source: ONS Census 2011

Household size and rooms



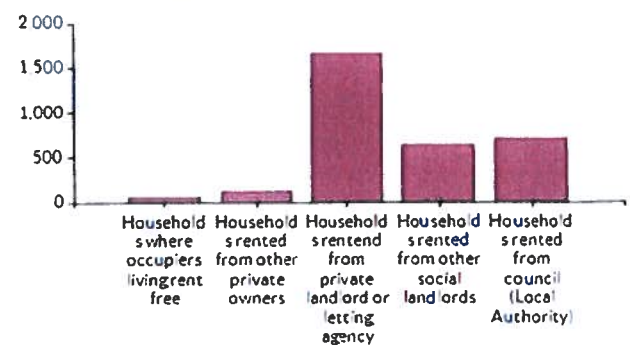
Source: ONS Census 2011

Ownership counts



Source: ONS Census 2011

Rental counts



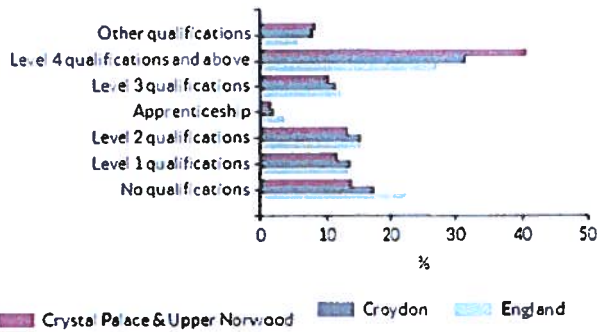
Source: ONS Census 2011

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Children and Young People | Crystal Palace & Upper Norwood

Improving the level of education and skills present within a local population remains an important policy objective for both local and central government. The task of implementing initiatives to improve life-long learning and enhance individual development (and employability) represents a significant and essential challenge for local authorities.

Highest level qualification attained

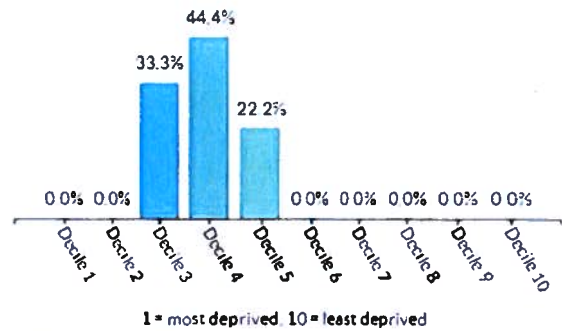


Source: ONS Census 2011

This chart shows % of working age people with highest level of qualification attained:

- Level 1: 1-4 O Levels/CSE/GCSEs (any grades), NVQ Level 1
- Level 2: 5+ O Level (Passes)/CSEs (Grade 1)/GCSEs (Grades A-C), 1 A Level/ 2-3 AS Levels/VCEs, NVQ level 2
- Level 3: 2+ A Levels/VCEs, 4+ AS Levels, NVQ Level 3;
- Level 4 and above: Degree (for example BA, BSc), Higher Degree (for example MA, PhD, PGCE), NVQ Level 4-5, HNC, HND
- Other qualifications: Vocational/Work-related Qualifications, Foreign Qualifications (not stated/level unknown).

Income deprivation affecting children index (IDACI)



Date: 2019 Source: DCLG

The Indices of Deprivation 2019 provide a set of relative measures of deprivation for small areas (Lower-layer Super Output Areas) across England. The IADCI is a subset of the Income Deprivation Domain, with the Index showing the proportion of children aged 0 - 15 in each Lower-layer Super Output Area that live in families that are income deprived (those that are in receipt of Income Support, income-based Jobseeker's Allowance, Pension Credit Guarantee or Child Tax Credit below a given threshold). The chart shows the proportion of LSOAs in Crystal Palace & Upper Norwood in each decile with decile 1 being the most deprived 10% of areas in England.

[Top](#)

Crime | Crystal Palace & Upper Norwood

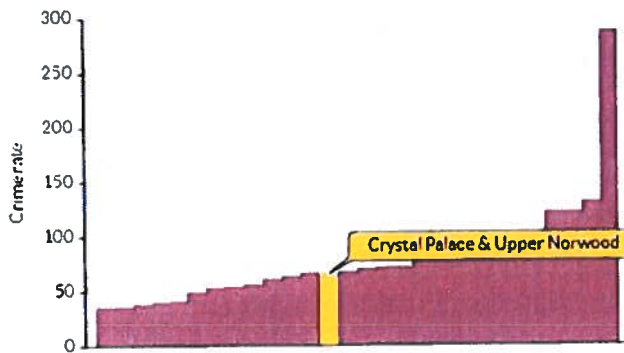
The absence of a safe and secure place in which to live can have an extremely negative impact on physical and emotional health and wellbeing. This section displays data on overall crime and a breakdown of crime types for Crystal Palace & Upper Norwood.

Single crime case data have been aggregated for Crystal Palace & Upper Norwood and rates are calculated per 1,000 population. 12-month rolling figures use an average of the population monthly figures over the same period. Where the dates for the crime data exceed the latest available date for population estimates, the latest population figure was used for any crime rates after that date (no extrapolating).

Crime at a glance...

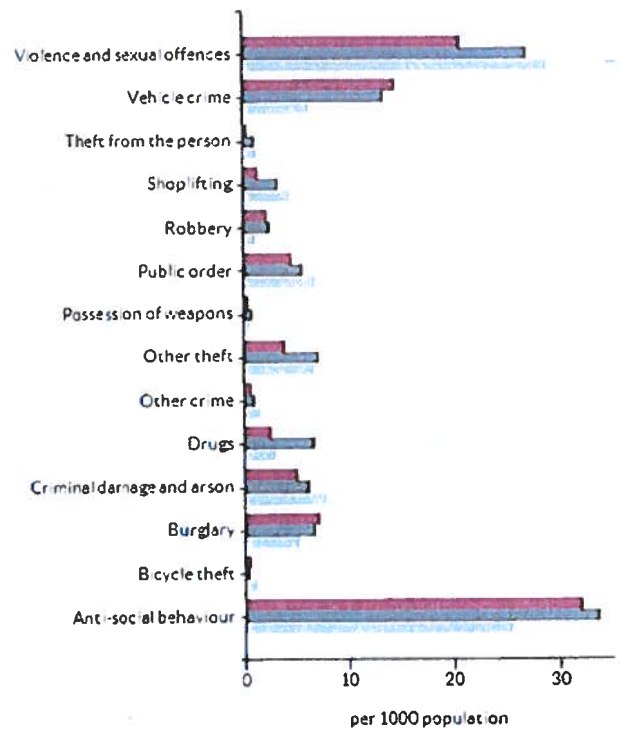


Crime rate by area



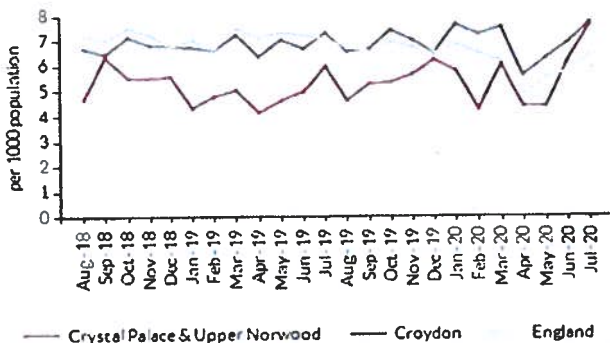
Date: Aug-19 - Jul-20 Source: data.police.uk

Crime rate by type of crime



Date: Aug-19 - Jul-20 Source: data.police.uk

Change in crime rate over time



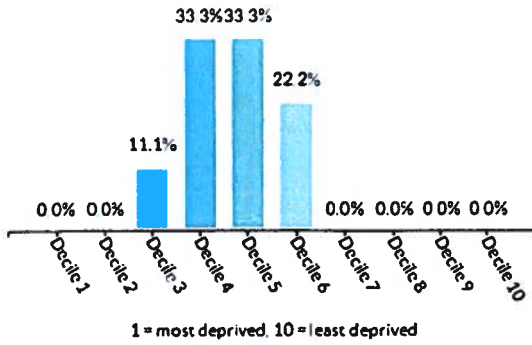
Source: data.police.uk

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Deprivation | Crystal Palace & Upper Norwood

The Index of Multiple Deprivation (IMD) 2019 is the official measure of relative deprivation for small areas (or neighbourhoods) in England. The IMD ranks every small area (Lower Super Output Area) in England from 1 (most deprived) to 32,844 (least deprived). For larger areas we can look at the proportion of LSOAs within the area that lie within each decile. Decile 1 represents the most deprived 10% of LSOAs in England while decile 10 shows the least deprived 10% of LSOAs.

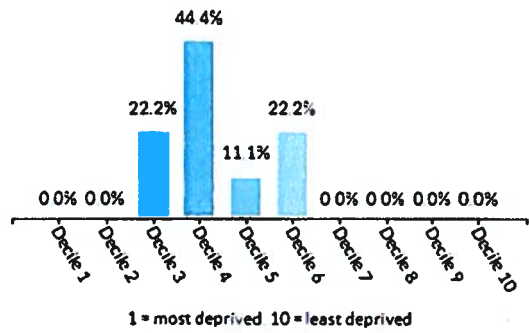
Index of Multiple Deprivation



Date: 2019 Source: DCLG

The Index of Multiple Deprivation (IMD) combines information from seven domains to produce an overall relative measure of deprivation. The domains are: Income; Employment; Education; Skills and Training; Health and Disability; Crime; Barriers to Housing Services; Living Environment. Each domain is given a weighting and is based on a basket of indicators.

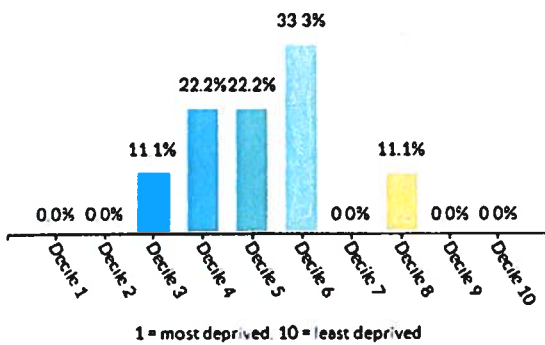
Income domain



Date: 2019 Source: DCLG

The Income Deprivation Domain measures the proportion of the population in an area experiencing deprivation relating to low income. The definition of low income used includes both those people that are out-of-work, and those that are in work but who have low earnings (and who satisfy the respective means tests).

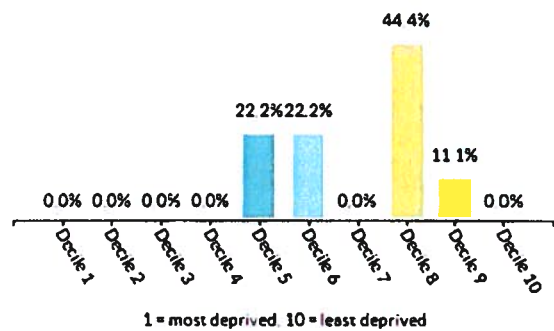
Employment domain



Date: 2019 Source: DCLG

The Employment Deprivation measures the proportion of the working-age population in an area involuntarily excluded from the labour market. This includes people who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.

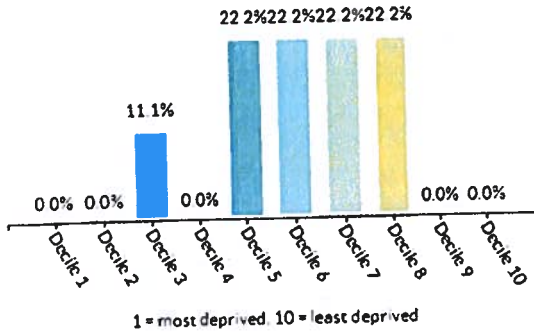
Education domain



Date: 2019 Source: DCLG

The Education, Skills and Training Domain measures the lack of attainment and skills in the local population. The indicators fall into two sub-domains: one relating to children and young people and one relating to adult skills. These two sub-domains are designed to reflect the 'flow' and 'stock' of educational disadvantage within an area respectively.

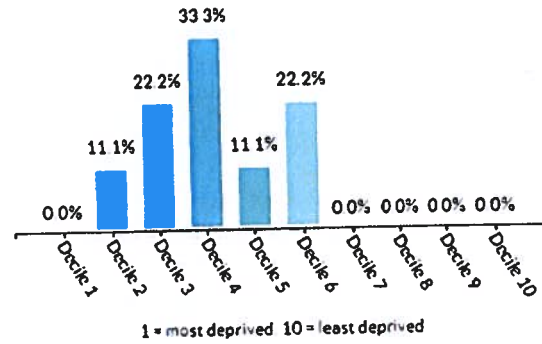
Health domain



Date: 2019 Source: DCLG

The Health Deprivation and Disability Domain measures the risk of premature death and the impairment of quality of life through poor physical and mental health. The domain measures morbidity, disability and premature mortality but not aspects of behaviour or environment that may be predictive of future health deprivation.

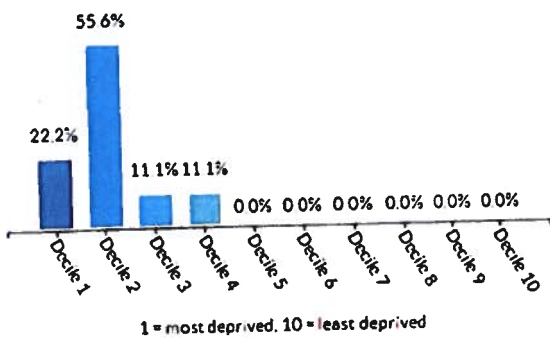
Crime domain



Date: 2019 Source: DCLG

Crime is an important feature of deprivation that has major effects on individuals and communities. The Crime Domain measures the risk of personal and material victimisation at local level.

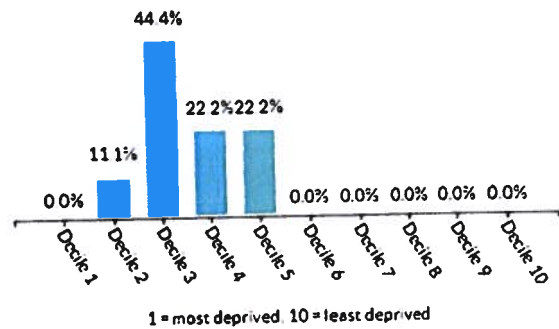
Barriers to housing and services domain



Date: 2019 Source: DCLG

The Barriers to Housing and Services Domain measures the physical and financial accessibility of housing and local services. The indicators fall into two sub-domains: 'geographical barriers', which relate to the physical proximity of local services, and 'wider barriers' which includes issues relating to access to housing such as affordability.

Living environment domain



Date: 2019 Source: DCLG

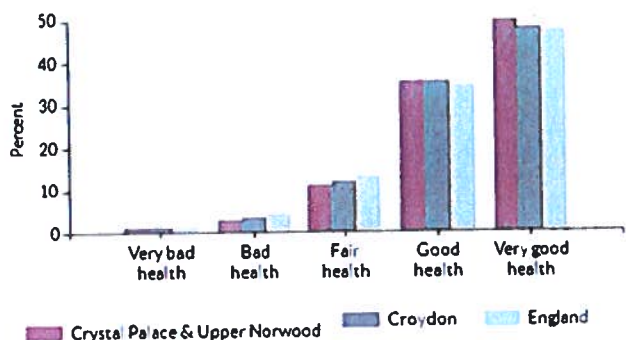
The Living Environment Deprivation Domain measures the quality of the local environment. The indicators fall into two sub-domains. The 'indoors' living environment measures the quality of housing; while the 'outdoors' living environment contains measures of air quality and road traffic accidents.

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Health | Crystal Palace & Upper Norwood

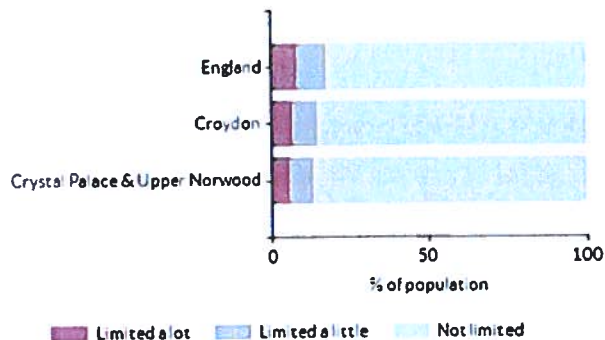
The health of people in our communities faces a range of complex and linked challenges, such as the increase in people living with chronic illness and long-term illness linked to our ageing society, and growing health inequalities. This section displays summary data on health and well-being in Crystal Palace & Upper Norwood.

Self-reported health



Source: ONS Census 2011

Day-to-day activity limited



Source: ONS Census 2011

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Environment | Crystal Palace & Upper Norwood

Economic welfare and social wellbeing are closely linked to the quality of the environment. There are many ways to protect our environment by reducing pollution and waste, protecting natural areas and biodiversity, and enforcing regulations that keep our water and air clean. This section displays data relating to the environment in Crystal Palace & Upper Norwood.

Environment at a glance...



5,714

Sum of cars and vans in the area (2011) [View metadata \(11354\)](#)



38.6%

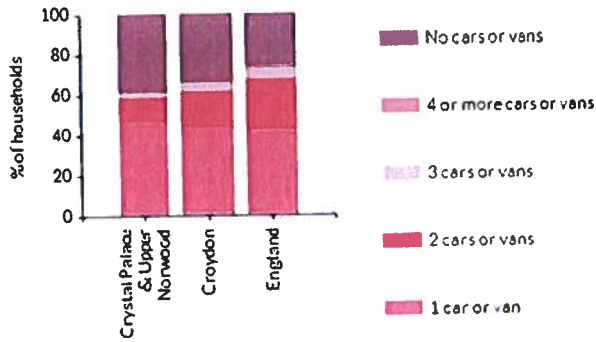
Households with no car/van (2011) [View metadata \(120844\)](#)



3.1%

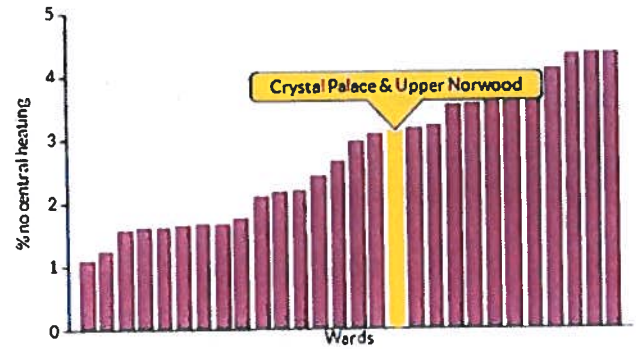
Households without central heating (2011) [View metadata \(120780\)](#)

Car/van ownership per household



Source: ONS Census 2011

Households with no central heating



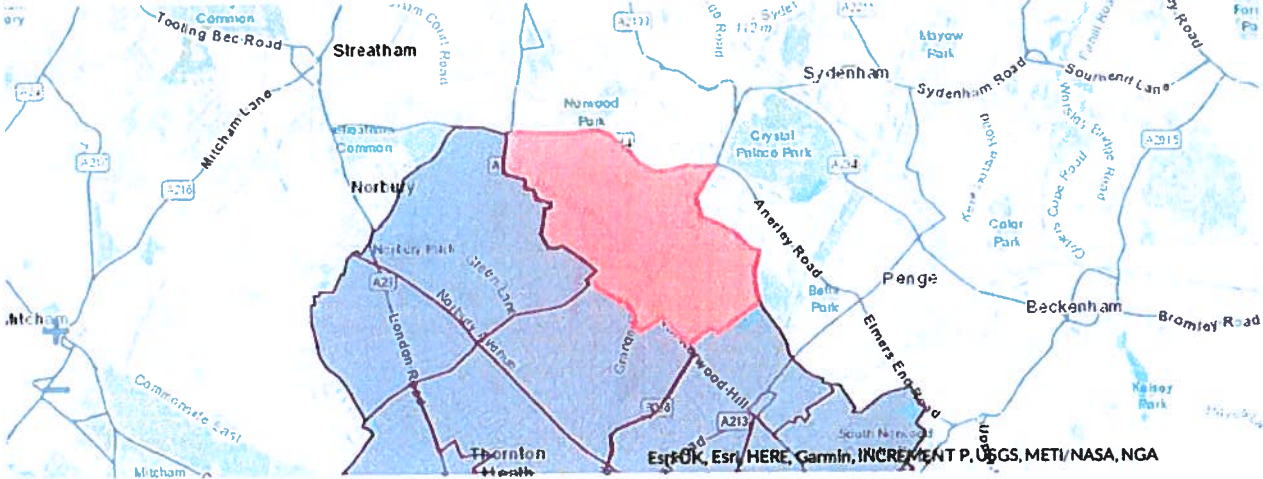
Source: ONS Census 2011

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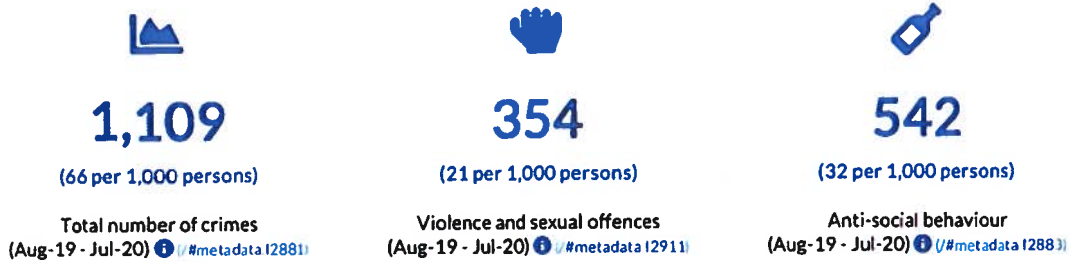
Crime report for selected areas*

Selected Areas Map

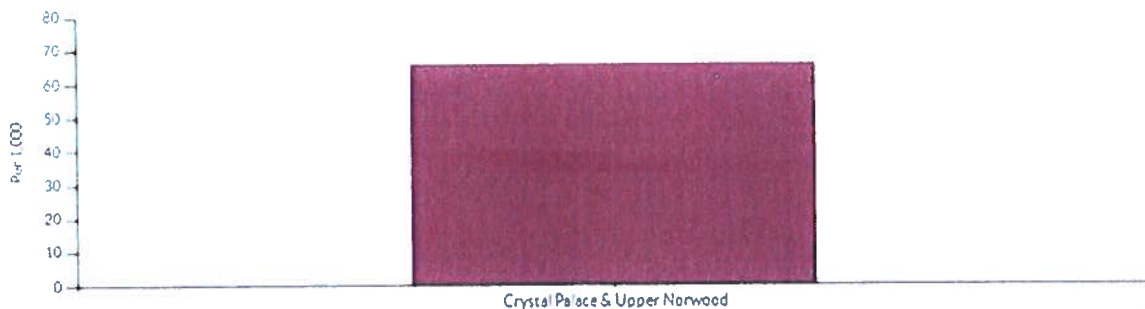


*This report can be for one or more areas. The figures are aggregated from the selected areas. For rates, values are calculated using the underlying numerator and denominator. The areas selected in this report are: Crystal Palace & Upper Norwood.

Crime at a glance...



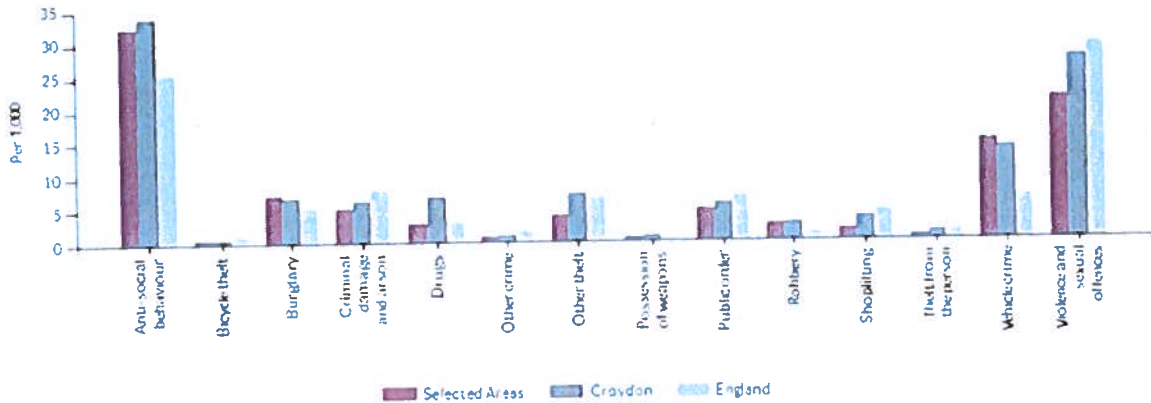
Overall crime rate by area



Date Aug 19 Jul-20 Source data police.uk

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Crime rate by type of crime

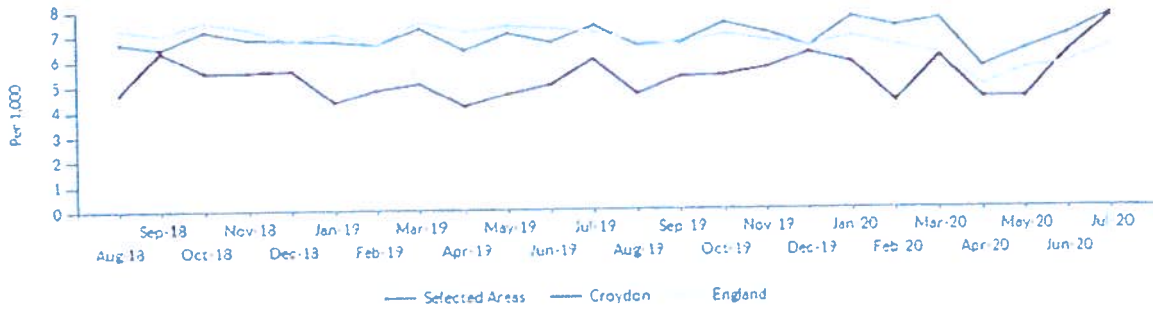


Date: Aug-19 - Jul-20 Source: data.police.uk

	Selected Areas		Croydon		England	
	Count	Per 1,000	Count	Per 1,000	Count	Per 1,000
Anti-social behaviour	542	32.2	13,027	33.8	1,428,081	25.5
Bicycle theft	11	0.7	214	0.6	70,476	1.3
Burglary	121	7.2	2,620	6.8	294,196	5.3
Criminal damage and arson	86	5.1	2,389	6.2	440,490	7.9
Drugs	45	2.7	2,624	6.8	167,110	3
Possession of weapons	9	0.5	341	0.9	38,850	0.7
Public order	80	4.8	2,172	5.6	383,396	6.9
Robbery	40	2.4	986	2.6	67,500	1.2
Shoplifting	25	1.5	1,334	3.5	255,108	4.6
Theft from the person	9	0.5	453	1.2	76,215	1.4
Other theft	67	4	2,791	7.2	374,642	6.7
Vehicle crime	248	14.7	5,286	13.7	357,971	6.4
Violence and sexual offences	354	21	10,470	27.2	1,631,188	29.1
Other crime	14	0.8	420	1.1	89,006	1.6

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Change in the overall crime rate



Source: data.police.uk

Rates (per 1,000)

	Selected Areas	Croydon	England	
Aug-18		4.7	6.7	7.3
Sep-18		6.4	6.5	7.1
Oct-18		5.5	7.2	7.6
Nov-18		5.5	6.8	7.3
Dec-18		5.6	6.8	6.8
Jan-19		4.3	6.8	7.1
Feb-19		4.8	6.6	6.7
Mar-19		5.1	7.3	7.5
Apr-19		4.2	6.4	7.1
May-19		4.6	7.1	7.4
Jun-19		5.0	6.7	7.3
Jul-19		6.0	7.4	7.1
Aug-19		4.6	6.6	6.8
Sep-19		5.3	6.7	6.6
Oct-19		5.3	7.4	7.0
Nov-19		5.6	7.1	6.8
Dec-19		6.2	6.5	6.5
Jan-20		5.8	7.7	6.9
Feb-20		4.3	7.3	6.5
Mar-20		6.1	7.6	6.2
Apr-20		4.4	5.6	4.9
May-20		4.4	6.3	5.5
Jun-20		6.2	6.9	5.8
Jul-20		7.6	7.7	6.5

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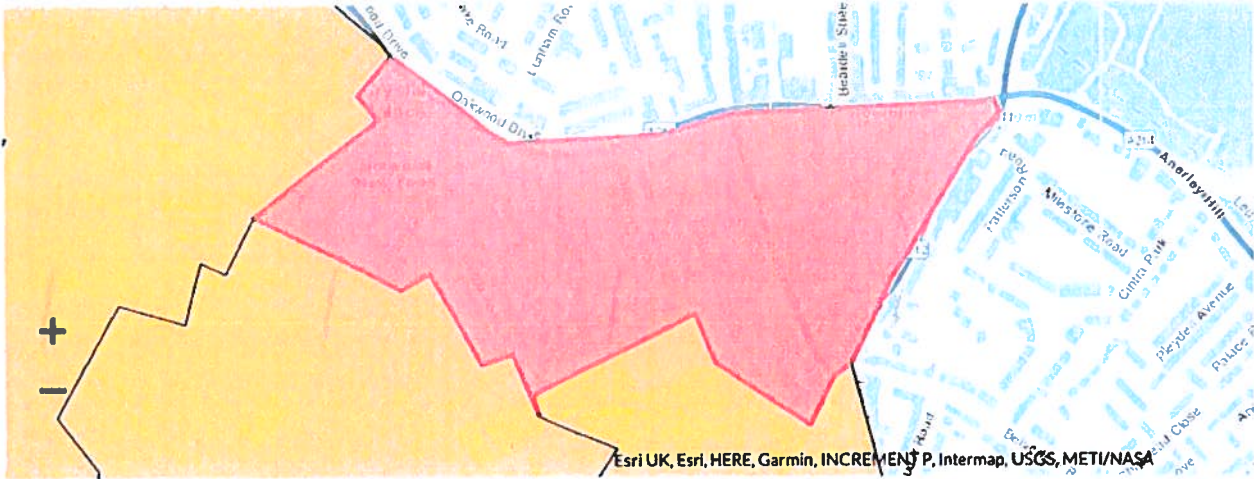
Counts	Selected Areas	Croydon	England	
Aug-18		79	2,588	407,020
Sep-18		107	2,501	395,243
Oct-18		93	2,767	422,753
Nov-18		93	2,637	407,019
Dec-18		94	2,624	379,957
Jan-19		73	2,603	395,946
Feb-19		81	2,555	372,898
Mar-19		85	2,800	421,324
Apr-19		70	2,463	399,860
May-19		78	2,721	412,414
Jun-19		84	2,580	405,924
Jul-19		101	2,832	397,951
Aug-19		78	2,536	377,985
Sep-19		89	2,570	369,529
Oct-19		90	2,868	390,663
Nov-19		95	2,717	377,615
Dec-19		105	2,509	365,024
Jan-20		98	2,952	385,988
Feb-20		72	2,802	364,280
Mar-20		102	2,914	346,792
Apr-20		74	2,166	273,371
May-20		74	2,431	310,133
Jun-20		104	2,660	323,029
Jul-20		128	2,975	361,739

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Crime report for selected areas*

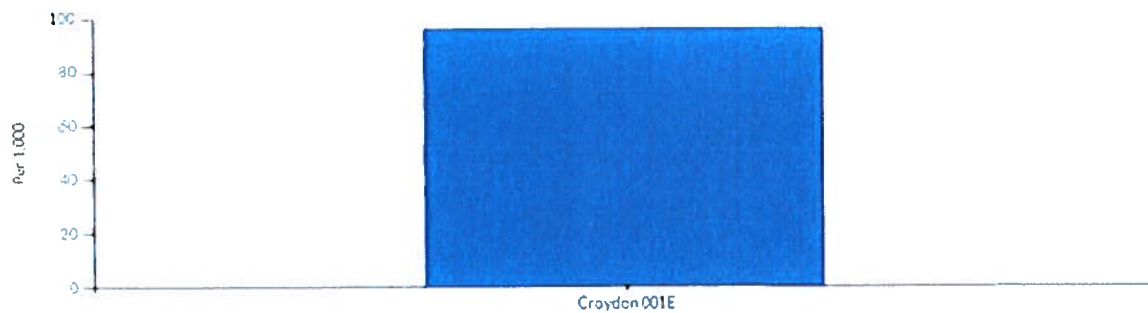
Selected Areas Map



Crime at a glance...



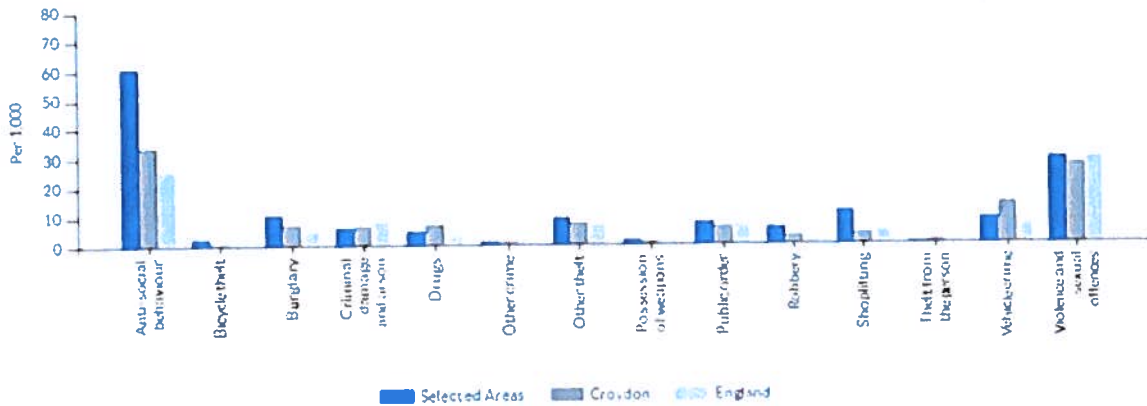
Overall crime rate by area



Date: Aug 19 - Jul 20 Source: data.police.uk

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Crime rate by type of crime

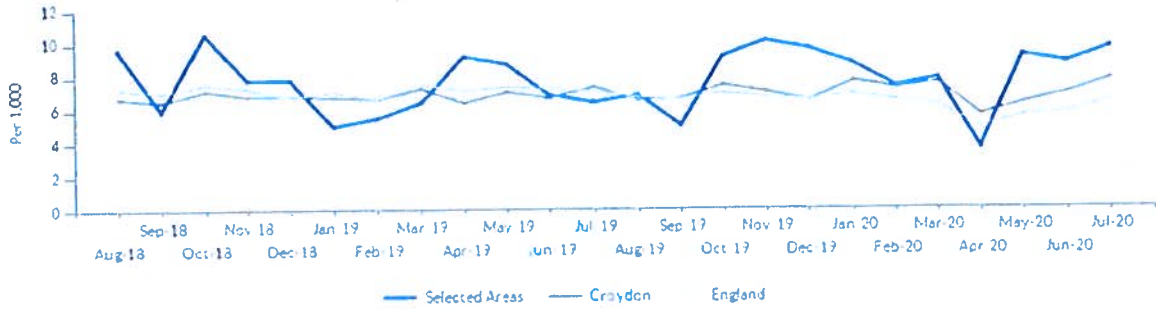


Date Aug-19-Jul-20 Source data.police.uk

	Selected Areas		Croydon		England	
	Count	Per 1,000	Count	Per 1,000	Count	Per 1,000
Anti-social behaviour	132	60.6	13,027	33.8	1,428,081	25.5
Bicycle theft	5	2.3	214	0.6	70,476	1.3
Burglary	22	10.1	2,620	6.8	294,196	5.3
Criminal damage and arson	13	6	2,389	6.2	440,490	7.9
Drugs	10	4.6	2,624	6.8	167,110	3
Possession of weapons	3	1.4	341	0.9	38,850	0.7
Public order	16	7.3	2,172	5.6	383,396	6.9
Robbery	12	5.5	986	2.6	67,500	1.2
Shoplifting	24	11	1,334	3.5	255,108	4.6
Theft from the person	1	0.5	453	1.2	76,215	1.4
Other theft	19	8.7	2,791	7.2	374,642	6.7
Vehicle crime	18	8.3	5,286	13.7	357,971	6.4
Violence and sexual offences	64	29.4	10,470	27.2	1,631,188	29.1
Other crime	2	0.9	420	1.1	89,006	1.6

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Change in the overall crime rate



Source data police.uk

Rates (per 1,000)

	Selected Areas	Croydon	England	
Aug-18	9.6	6.7	7.3	
Sep-18	6.0	6.5	7.1	
Oct-18	10.6	7.2	7.6	
Nov-18	7.8	6.8	7.3	
Dec-18	7.8	6.8	6.8	
Jan-19	5.0	6.8	7.1	
Feb-19	5.5	6.6	6.7	
Mar-19	6.4	7.3	7.5	
Apr-19	9.2	6.4	7.1	
May-19	8.7	7.1	7.4	
Jun-19	6.9	6.7	7.3	
Jul-19	6.4	7.4	7.1	
Aug-19	6.9	6.6	6.8	
Sep-19	5.0	6.7	6.6	
Oct-19	9.2	7.4	7.0	
Nov-19	10.1	7.1	6.8	
Dec-19	9.6	6.5	6.5	
Jan-20	8.7	7.7	6.9	
Feb-20	7.3	7.3	6.5	
Mar-20	7.8	7.6	6.2	
Apr-20	3.7	5.6	4.9	
May-20	9.2	6.3	5.5	
Jun-20	8.7	6.9	5.8	
Jul-20	9.6	7.7	6.5	

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Counts	Selected Areas	Croydon	England	
Aug-18		21	2,588	407,020
Sep-18		13	2,501	395,243
Oct-18		23	2,767	422,753
Nov-18		17	2,637	407,019
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Feb-19		12	2,555	372,898
Mar-19		14	2,800	421,324
Apr-19		20	2,463	399,860
May-19		19	2,721	412,414
Jun-19		15	2,580	405,924
Jul-19		14	2,832	397,951
Aug-19		15	2,536	377,985
Sep-19		11	2,570	369,529
Oct-19		20	2,868	390,663
Nov-19		22	2,717	377,615
Dec-19		21	2,509	365,024
Jan-20		19	2,952	385,988
Feb-20		16	2,802	364,280
Mar-20		17	2,914	346,792
Apr-20		8	2,166	273,371
May-20		20	2,431	310,133
Jun-20		19	2,660	323,029
Jul-20		21	2,975	361,739

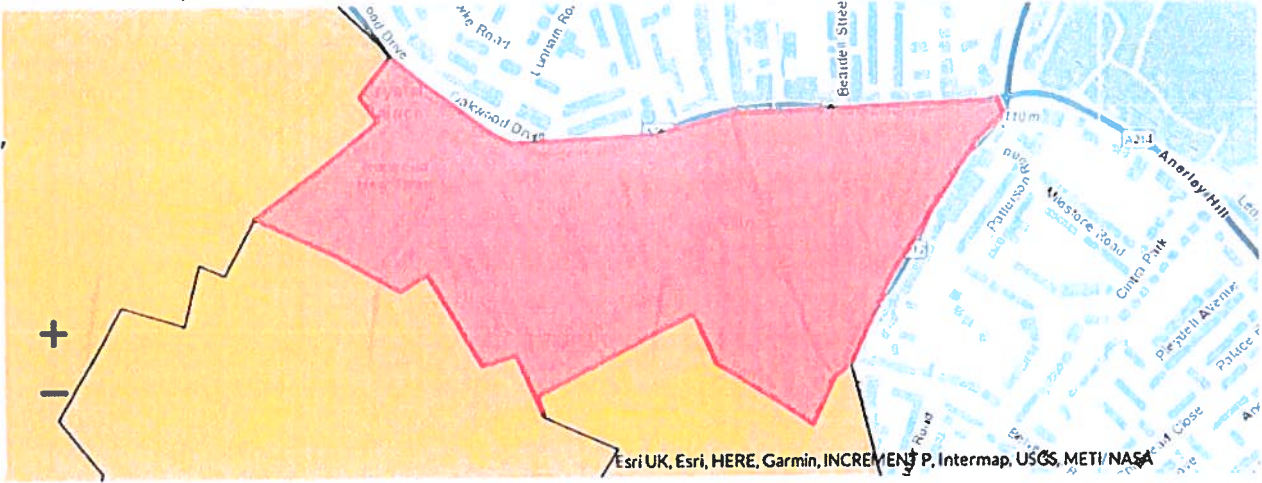
[Top](#)

*This report can be for one or more areas. The figures are aggregated from the selected areas. For rates, values are calculated using the underlying numerator and denominator. The areas selected in this report are: Croydon 001E.

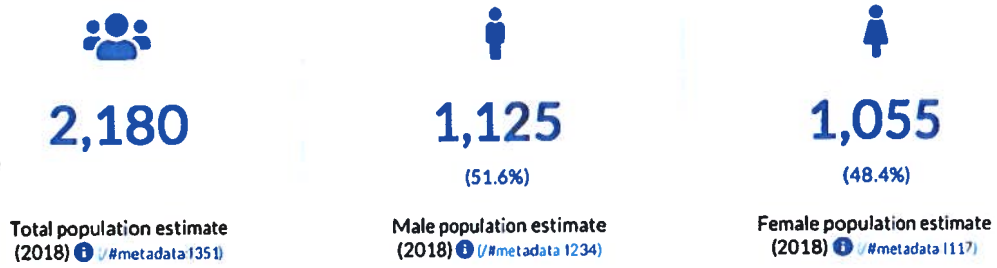
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Population report for selected areas*

Selected Areas Map



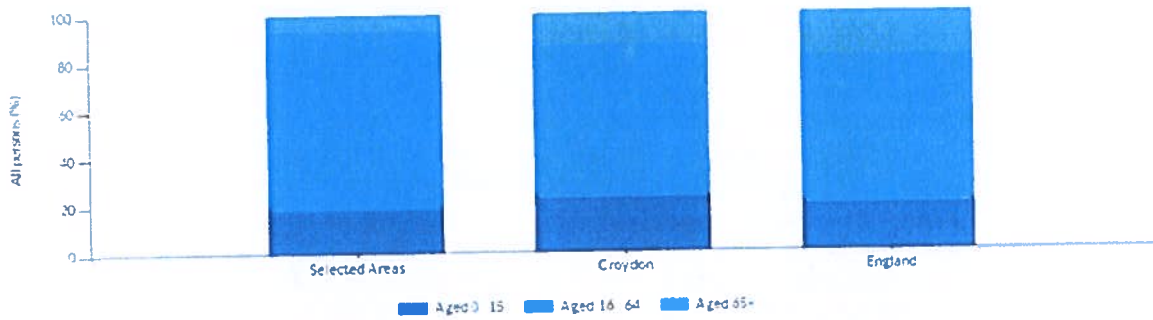
Population at a glance...



Population estimates

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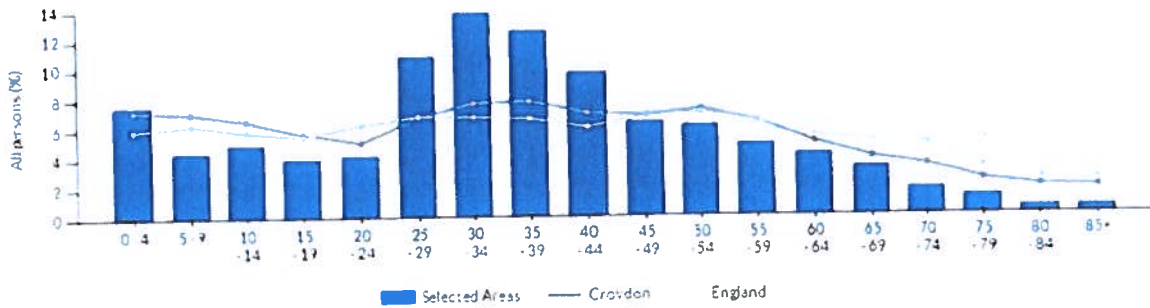
Population estimates for all persons by broad age group for 2018



Date 2018 Source ONS

	Selected Areas		Croydon		England	
	Count	%	Count	%	Count	%
Persons aged 0 - 15	385	17.7	85,414	22.2	10,748,458	19.2
Persons aged 16 - 64	1,638	75.1	247,778	64.3	35,049,467	62.6
Persons aged 65+	157	7.2	52,154	13.5	10,179,253	18.2

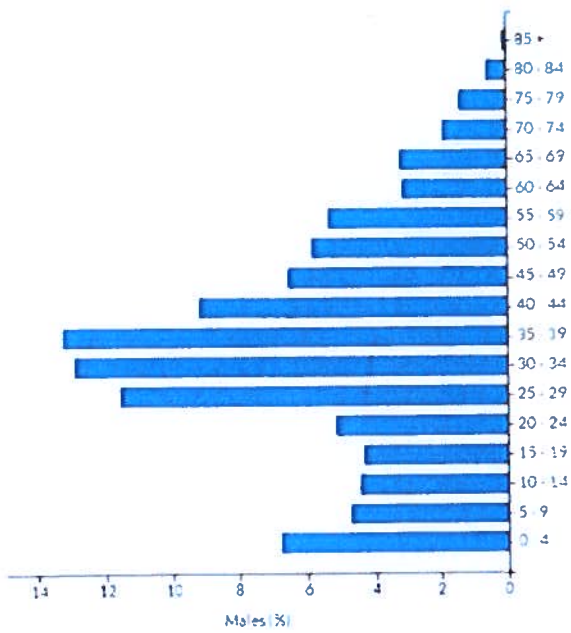
Population estimates for all persons by 5-year age group for 2018



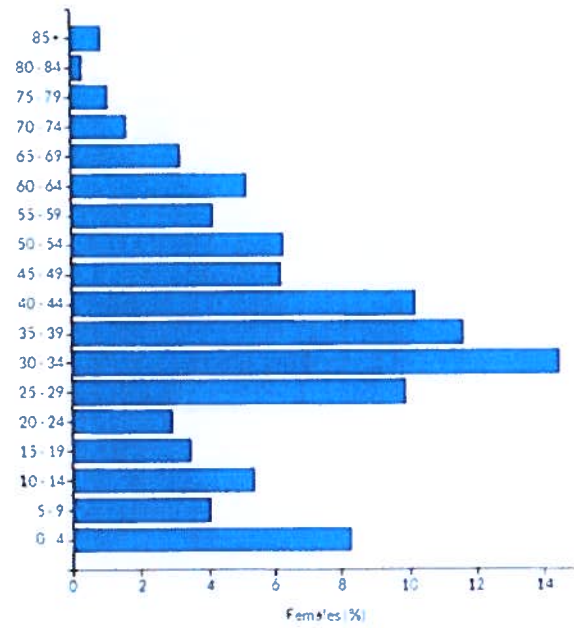
Date 2018 Source ONS

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Population estimates for males and females for 2018



Date: 2018 Source: ONS



Date: 2018 Source: ONS

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Country of birth

Country of birth breakdown



Source: ONS Census 2011

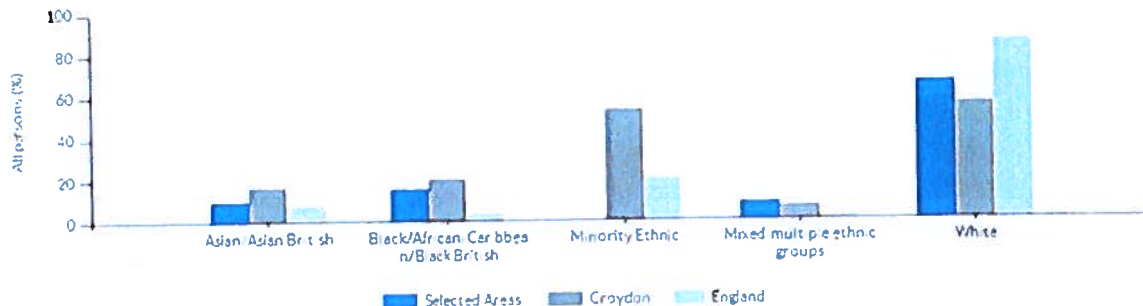
	Selected Areas		Croydon		England		
	Count	%	Count	%	Count	%	
England	1,245	65.4	249,667	68.7	44,246,592	83.5	
Northern Ireland	11	0.6	998	0.3	206,735	0.4	
Scotland	28	1.5	3,201	0.9	708,872	1.3	
Wales	20	1.1	1,927	0.5	506,619	1.0	
Ireland	33	1.7	4,055	1.1	395,182	0.7	
EU: Member countries in March 2001	92	4.8	7,927	2.2	894,908	1.7	
EU: Accession countries April 2001 to March 2011	103	5.4	10,472	2.9	1,085,351	2.0	
Other countries	371	19.5	85,030	23.4	4,961,698	9.4	

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Ethnicity

Broad ethnicity groups

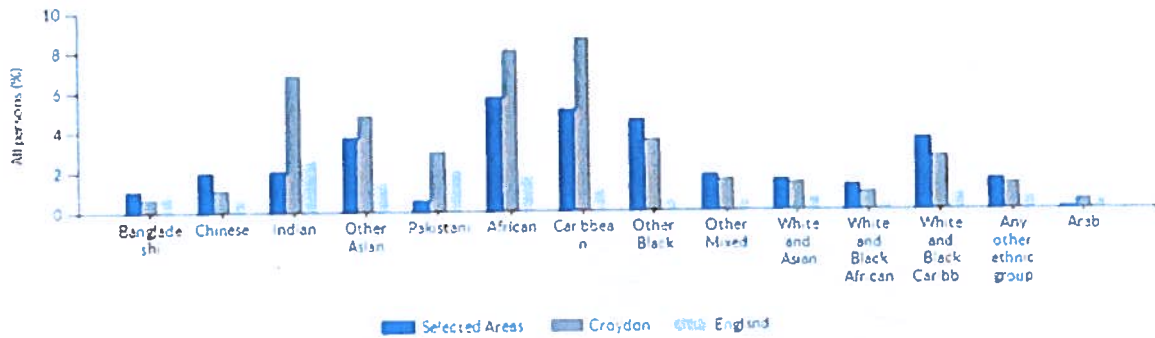


Source: ONS Census 2011

	Selected Areas		Croydon		England		
	Count	%	Count	%	Count	%	
Asian/Asian British	177	9.3	59,627	16.4	4,143,403	7.8	
Black/African/Caribbean/Black British	290	15.2	73,256	20.2	1,846,614	3.5	
Minority Ethnic - Total	980	N/A	191,638	52.7	10,733,220	20.2	
Mixed/multiple ethnic groups	154	8.1	23,895	6.6	1,192,879	2.3	
Other ethnic group	30	1.6	6,405	1.8	548,418	1	
White	1,252	65.8	200,195	55.1	45,281,142	85.4	

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Detailed ethnicity groups



Source: ONS Census 2011

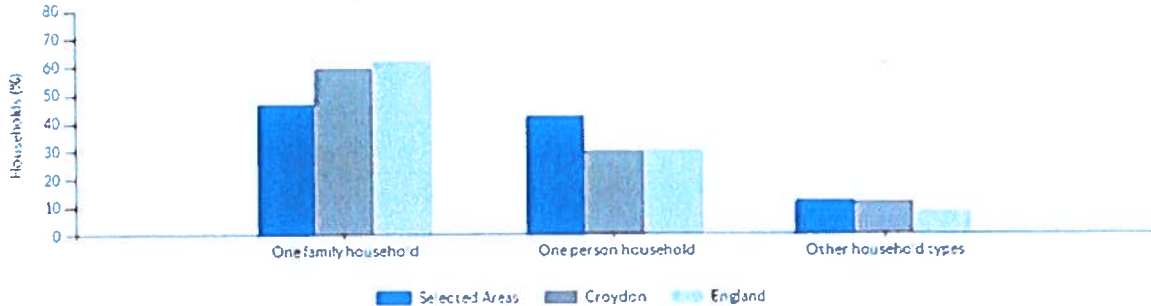
	Selected Areas		Croydon		England		
	Count	%	Count	%	Count	%	
Asian/Asian British: Bangladeshi	20	1.1	2,570	48.5	436,514	0.7	0.8
Asian/Asian British: Chinese	37	1.9	3,925	1.1	379,503	0.7	0.7
Asian/Asian British: Indian	39	2.0	24,660	6.8	1,395,702	2.6	2.6
Asian/Asian British: Other Asian	71	3.7	17,607	4.8	819,402	1.5	1.5
Asian/Asian British: Pakistani	10	0.5	10,865	3.0	1,112,282	2.1	2.1
Black/African/Caribbean/Black British: African	108	5.7	28,981	8.0	977,741	1.8	1.8
Black/African/Caribbean/Black British: Caribbean	96	5.0	31,320	8.6	591,016	1.1	1.1
Black/African/Caribbean/Black British: Other Black	86	4.5	12,955	3.6	277,857	0.5	0.5
Mixed/multiple ethnic groups: White and Asian	29	1.5	5,140	1.4	332,708	0.6	0.6
Mixed/multiple ethnic groups: White and Black African	24	1.3	3,279	0.9	161,550	0.3	0.3
Mixed/multiple ethnic groups: White and Black Caribbean	68	3.6	9,650	2.7	415,616	0.8	0.8
Mixed/multiple ethnic groups: Other Mixed	33	1.7	5,826	1.6	283,005	0.5	0.5
Other ethnic group: Arab	1	0.1	1,701	0.5	220,985	0.4	0.4
Other ethnic group: Any other ethnic group	29	1.5	4,704	1.3	327,433	0.6	0.6
White: English/Welsh/Scottish/Northern Irish/British	923	48.5	171,740	47.3	42,279,236	79.8	79.8
White: Gypsy or Irish Traveller	0	0.0	234	0.1	54,895	0.1	0.1
White: Irish	53	2.8	5,369	1.5	517,001	1.0	1.0
White: Other White	276	14.5	22,852	6.3	2,430,010	4.6	4.6

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Household composition

Household composition breakdown



Source: ONS Census 2011

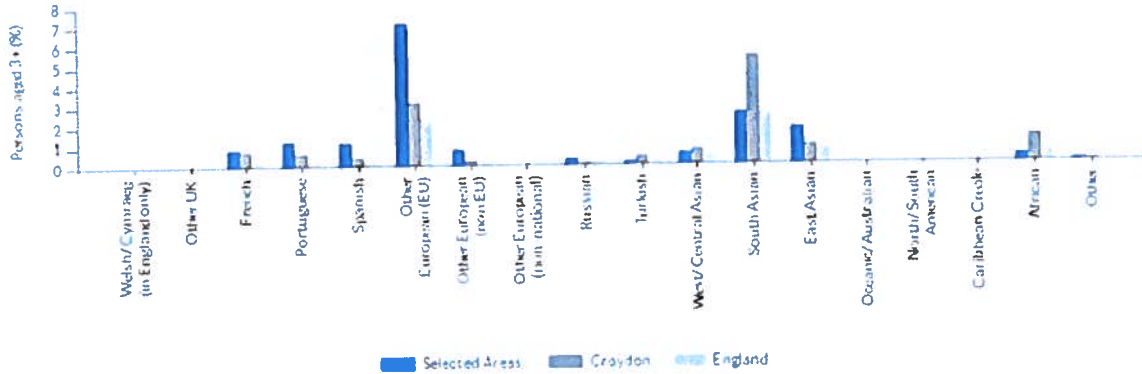
	Selected Areas		Croydon		England	
	Count	%	Count	%	Count	%
One family only: All aged 65 and over	8	0.8	7,394	5.1	1,789,465	8.1
One family only: Cohabiting couple	151	15.7	11,628	8	2,172,438	9.8
One family only: Cohabiting couple: All children non-dependent	4	0.4	724	0.5	108,486	0.5
One family only: Cohabiting couple: Dependent children	41	4.3	5,034	3.5	890,780	4
One family only: Cohabiting couple: No children	106	11	5,870	4	1,173,172	5.3
One family only: Lone parent	128	13.3	23,160	16	2,339,824	10.6
One family only: Lone parent: All children non-dependent	31	3.2	6,339	4.4	766,569	3.5
One family only: Lone parent: Dependent children	97	10.1	16,821	11.6	1,573,255	7.1
One family only: Married or same-sex civil partnership couple	160	16.6	43,480	30	7,329,455	33.2
One family only: Married or same-sex civil partnership couple: All children non-dependent	11	1.1	8,292	5.7	1,234,355	5.6
One family only: Married or same-sex civil partnership couple: Dependent children	81	8.4	22,469	15.5	3,375,890	15.3
One family only: Married or same-sex civil partnership couple: No children	68	7.1	12,719	8.8	2,719,210	12.3
One person household: Aged 65 and over	47	4.9	14,107	9.7	2,725,596	12.4
One person household: Other	357	37.1	28,936	20	3,940,897	17.9
Other household types: All aged 65 and over	0	0	387	0.3	61,715	0.3
Other household types: All full-time students	0	0	319	0.2	124,285	0.6
Other household types: Other	92	9.6	8,870	6.1	995,677	4.5
Other household types: With dependent children	19	2	6,729	4.6	584,016	2.6

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Main language

Main language breakdown



Source: ONS Census 2011

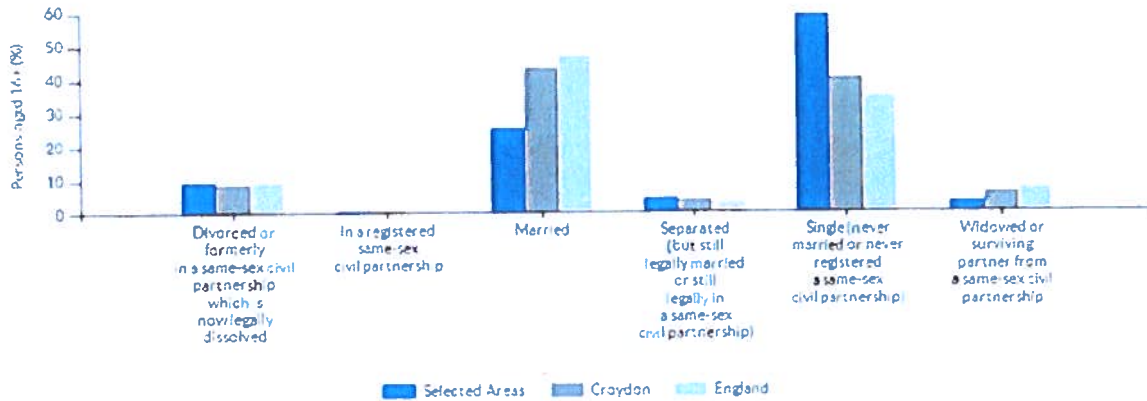
	Selected Areas		Croydon		England		
	Count	%	Count	%	Count	%	
English (English or Welsh if in Wales)	1,505	83.3	296,232	85.5	46,936,780	92	
Welsh/Cymraeg (in England only)	0	0	20	0	8,248	0	
Other UK language	0	0	31	0	4,637	0	
French	14	0.8	2,408	0.7	145,026	0.3	
Portuguese	21	1.2	2,024	0.6	131,002	0.3	
Spanish	20	1.1	1,378	0.4	118,554	0.2	
Other European language (EU)	128	7.1	10,754	3.1	1,155,972	2.3	
Other European language (EU): Any other European language (EU)	0	0	16	0	2,878	0	
Other European language (non EU)	13	0.7	689	0.2	64,985	0.1	
Other European language (non-national)	0	0	7	0	4,600	0	
Russian	5	0.3	503	0.1	66,271	0.1	
Turkish	3	0.2	1,482	0.4	98,083	0.2	
Arabic	2	0.1	1,002	0.3	152,490	0.3	
West/Central Asian language	10	0.6	2,534	0.7	181,424	0.4	
South Asian language	46	2.5	18,881	5.4	1,281,168	2.5	
East Asian language	32	1.8	3,223	0.9	374,013	0.7	
Oceanic/Australian language	0	0	3	0	1,729	0	
North/South American language	0	0	22	0	1,022	0	
Caribbean Creole	0	0	18	0	506	0	
African language	6	0.3	4,523	1.3	240,572	0.5	
Other languages	1	0.1	457	0.1	17,675	0	
Sign language	1	0.1	260	0.1	20,853	0	

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Marital and civil partnership status

Marital and civil partnership status breakdown



Source: ONS Census 2011

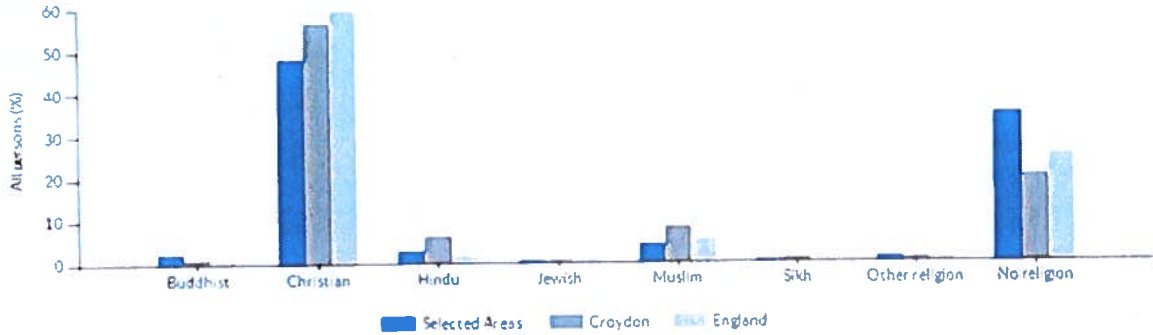
	Selected Areas		Croydon		England	
	Count	%	Count	%	Count	%
Divorced or formerly in a same-sex civil partnership which is now legally dissolved	144	9.1	23,202	9.1	3,857,137	9.0
In a registered same-sex civil partnership	11	0.7	796	0.7	100,288	0.2
Married	397	25.1	122,013	25.1	20,029,369	46.6
Separated (but still legally married or still legally in a same-sex civil partnership)	61	3.9	9,822	3.9	1,141,196	2.7
Single (never married or never registered a same-sex civil partnership)	927	58.5	112,821	58.5	14,889,928	34.6
Widowed or surviving partner from a same-sex civil partnership	44	2.8	15,614	2.8	2,971,702	6.9

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Religion

Religion breakdown



Source: ONS Census 2011

	Selected Areas		Croydon		England		
	Count	%	Count	%	Count	%	
Buddhist	36	1.9	1.9	2,381	0.7	238,626	0.5
Christian	913	48	48	205,022	56.4	31,479,876	59.4
Hindu	49	2.6	2.6	21,739	6	806,199	1.5
Jewish	4	0.2	0.2	709	0.2	261,282	0.5
Muslim	72	3.8	3.8	29,513	8.1	2,660,116	5
Sikh	2	0.1	0.1	1,450	0.4	420,196	0.8
Other religion	18	0.9	0.9	2,153	0.6	227,825	0.4
No religion	660	34.7	34.7	72,654	20	13,114,232	24.7

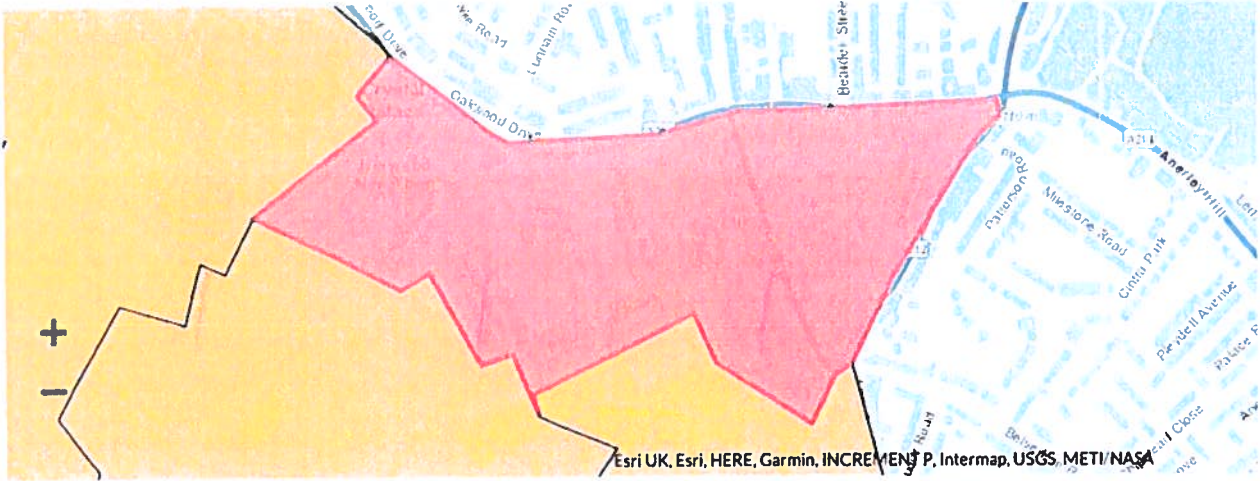
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*This report can be for one or more areas. The figures are aggregated from the selected areas. For rates, values are calculated using the underlying numerator and denominator. The areas selected in this report are: Croydon 001E.

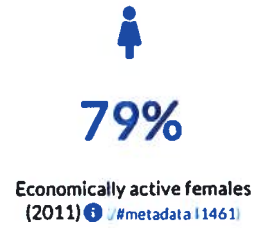
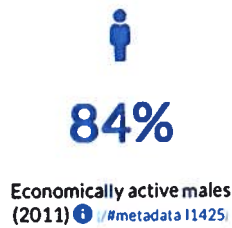
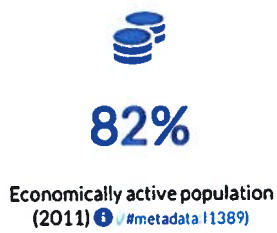
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Economy report for selected areas*

Selected Areas Map

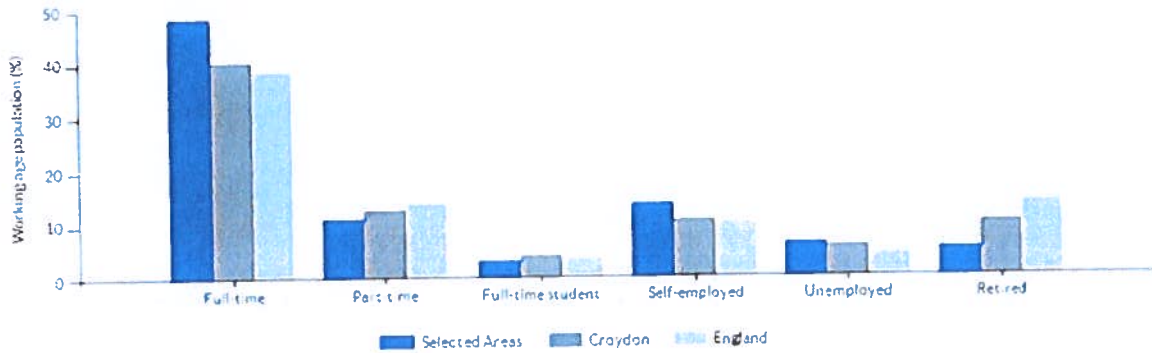


Economically active at a glance...



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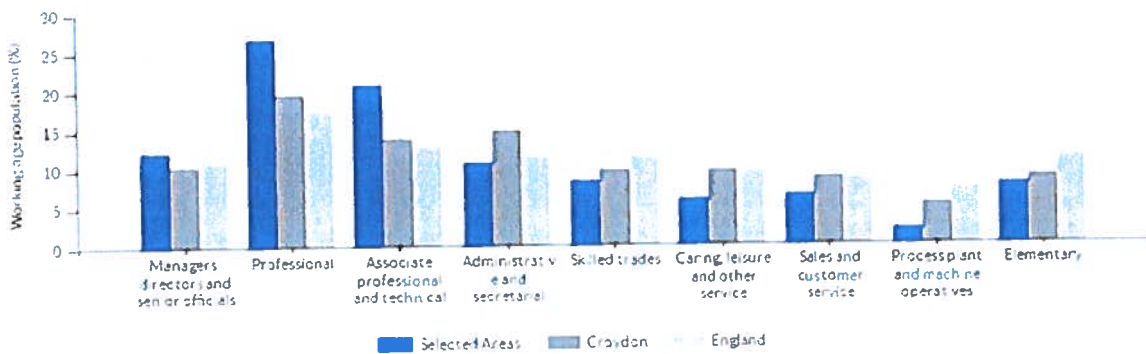
Economic activity by type



Source: ONS Census 2011

	Selected Areas		Croydon		England		
	Count	%	Count	%	Count	%	
Full-time employee	751	48.5	105,621	40.2	15,016,564	38.6	
Part-time employee	167	10.8	33,112	12.6	5,333,268	13.7	
Full-time student	45	2.9	10,043	3.8	1,336,823	3.4	
Self-employed	210	13.5	27,020	10.3	3,793,632	9.8	
Unemployed	95	6.1	14,512	5.5	1,702,847	4.4	
Retired	79	5.1	26,079	9.9	5,320,691	13.7	

Occupation groups



Source: ONS Census 2011

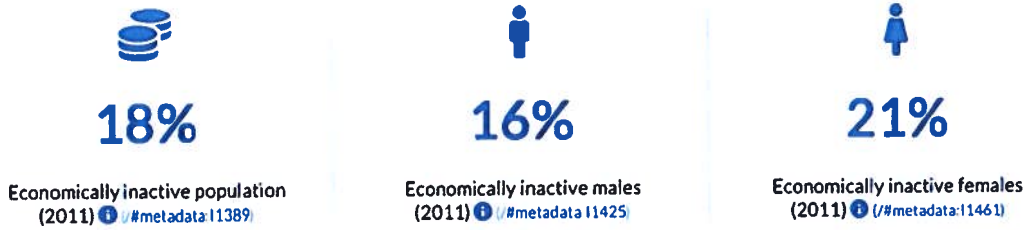
	Selected Areas		Croydon		England		
	Count	%	Count	%	Count	%	
Managers, directors and senior officials	140	12.1	17,832	10.3	2,734,900	10.9	
Professional occupations	310	26.7	33,894	19.6	4,400,375	17.5	
Associate professional and technical occupations	241	20.8	23,715	13.7	3,219,067	12.8	
Administrative and secretarial occupations	123	10.6	25,436	14.7	2,883,230	11.5	
Skilled trades occupations	94	8.1	16,524	9.6	2,858,680	11.4	
Caring, leisure and other service occupations	68	5.9	16,350	9.5	2,348,650	9.3	
Sales and customer service occupations	74	6.4	15,062	8.7	2,117,477	8.4	
Process plant and machine operatives	21	1.8	9,045	5.2	1,808,024	7.2	
Elementary occupations	88	7.6	15,129	8.7	2,792,318	11.1	

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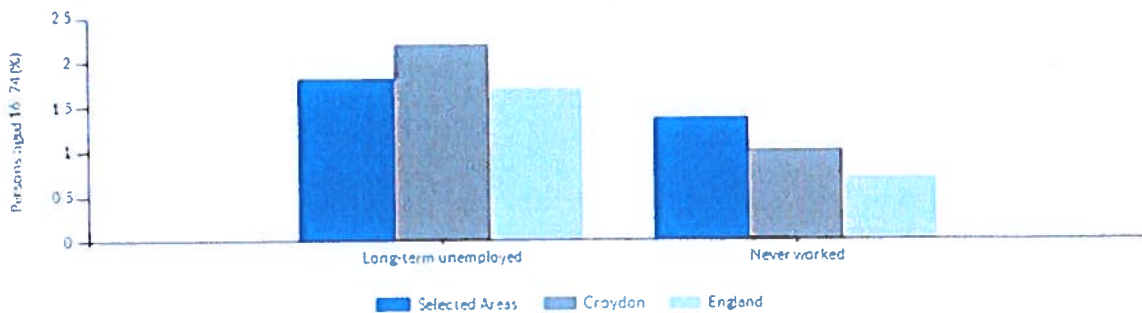
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Economically inactive

Economically inactive at a glance...



Long-term unemployed/never worked



Source: ONS Census 2011

	Selected Areas		Croydon		England		
	Count	%	Count	%	Count	%	
Long-term unemployed	28	1.8	5,805	2.2	668,496	1.7	
Unemployed: Never worked	21	1.4	2,643	1	276,121	0.7	

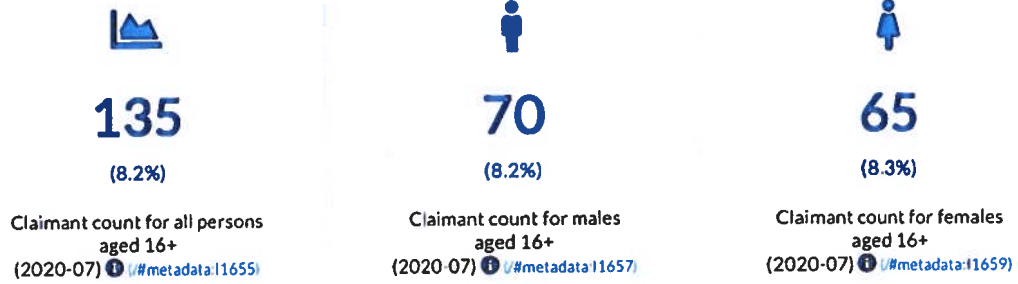
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Claimant counts

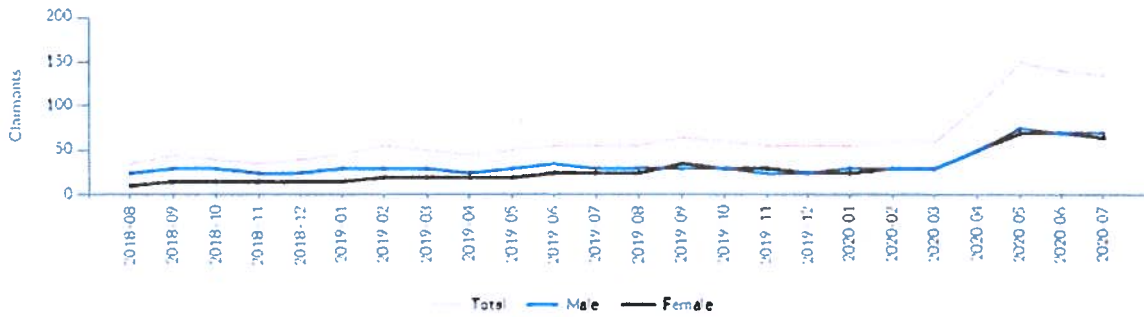
This section shows claimant counts - the stock of Universal Credit and Job Seekers Allowance claimants - for persons aged 16 and over in Croydon 001E.

Claimant counts at a glance...



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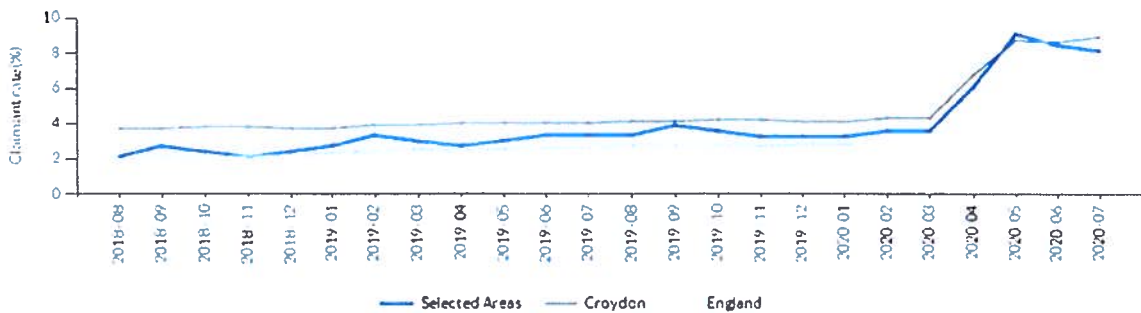
Monthly claimant counts



Source:ONS

	Selected Areas	Croydon	England	
2018-08		35	9,390	739,645
2018-09		45	9,540	751,880
2018-10		40	9,605	765,680
2018-11		35	9,655	778,325
2018-12		40	9,460	796,815
2019-01		45	9,395	826,180
2019-02		55	10,035	875,840
2019-03		50	9,985	900,650
2019-04		45	10,065	915,240
2019-05		50	10,110	922,775
2019-06		55	10,270	942,115
2019-07		55	10,230	949,770
2019-08		55	10,415	965,275
2019-09		65	10,475	969,255
2019-10		60	10,540	987,540
2019-11		55	10,555	998,185
2019-12		55	10,525	1,003,150
2020-01		55	10,440	1,014,875
2020-02		60	10,820	1,050,875
2020-03		60	10,835	1,063,505
2020-04		100	16,790	1,764,725
2020-05		150	21,860	2,264,855
2020-06		140	21,520	2,200,615
2020-07		135	22,185	2,273,600

Monthly claimant rate



Source:ONS

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Selected Areas	Croydon	England	
2018-08	2.2	3.8	2.1
2018-09	2.8	3.8	2.2
2018-10	2.5	3.9	2.2
2018-11	2.2	3.9	2.2
2018-12	2.5	3.8	2.3
2019-01	2.8	3.8	2.4
2019-02	3.4	4	2.5
2019-03	3.1	4	2.6
2019-04	2.8	4.1	2.6
2019-05	3.1	4.1	2.6
2019-06	3.4	4.1	2.7
2019-07	3.4	4.1	2.7
2019-08	3.4	4.2	2.8
2019-09	4	4.2	2.8
2019-10	3.7	4.3	2.8
2019-11	3.4	4.3	2.8
2019-12	3.4	4.2	2.9
2020-01	3.4	4.2	2.9
2020-02	3.7	4.4	3
2020-03	3.7	4.4	3
2020-04	6.1	6.8	5
2020-05	9.2	8.8	6.4
2020-06	8.5	8.7	6.3
2020-07	8.2	9	6.5

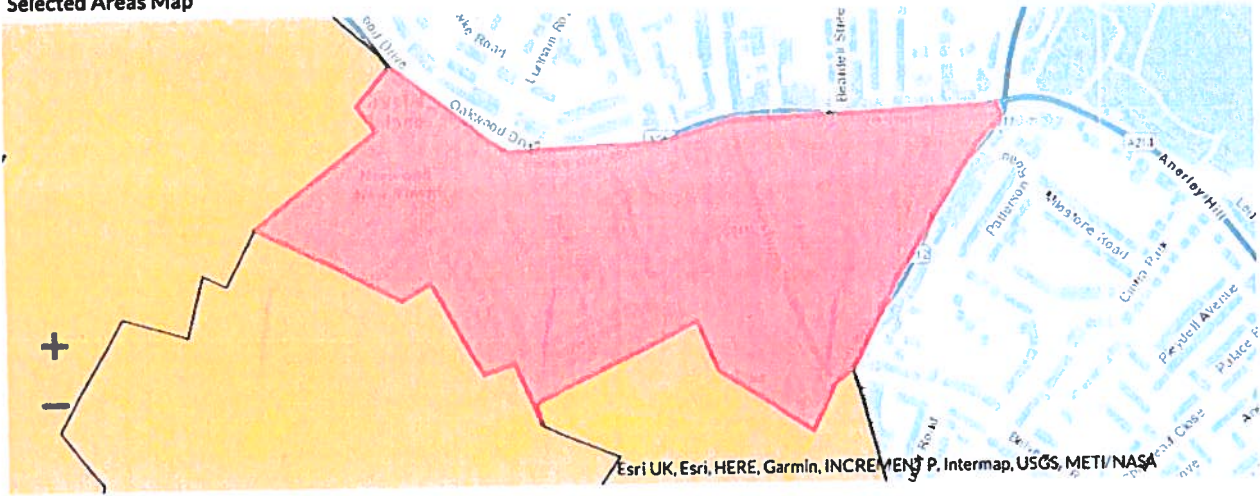
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* This report can be for one or more areas. The figures are aggregated from the selected areas. For rates, values are calculated using the underlying numerator and denominator. The areas selected in this report are: Croydon 001E.

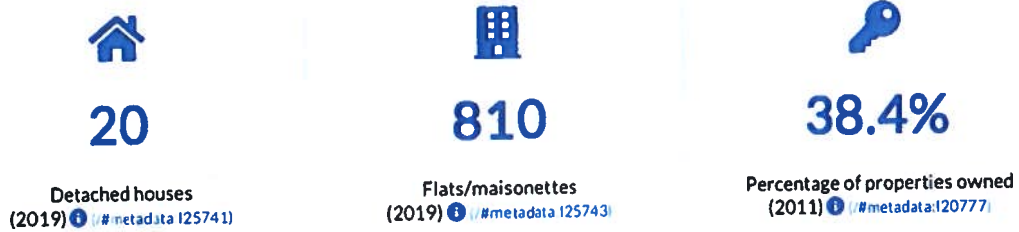
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Housing report for selected areas*

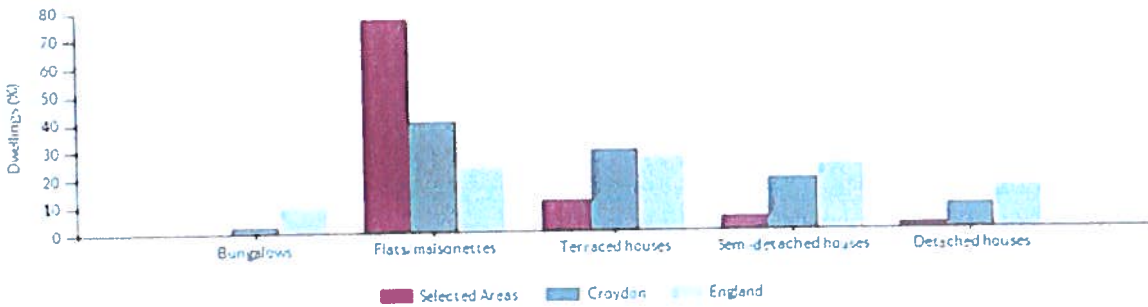
Selected Areas Map



Housing at a glance...



Dwellings by type



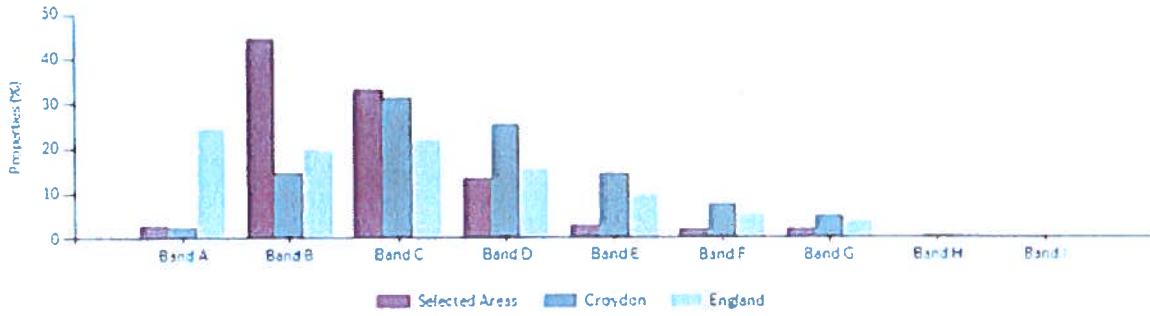
Date: 2019 Source: Valuation Office Agency

	Selected Areas		Croydon		England		
	Count	%	Count	%	Count	%	
Bungalows	0		0	3,680	2.3	2,281,310	9.3
Flats/maisonettes	810	76.4	62,700	39.6	5,665,030	23.2	
Terraced houses	120	11.3	46,230	29.2	6,427,560	26.3	
Semi-detached houses	50	4.7	29,680	18.8	5,801,880	23.8	
Detached houses	20	1.9	13,920	8.8	3,812,000	15.6	

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Properties by council tax band



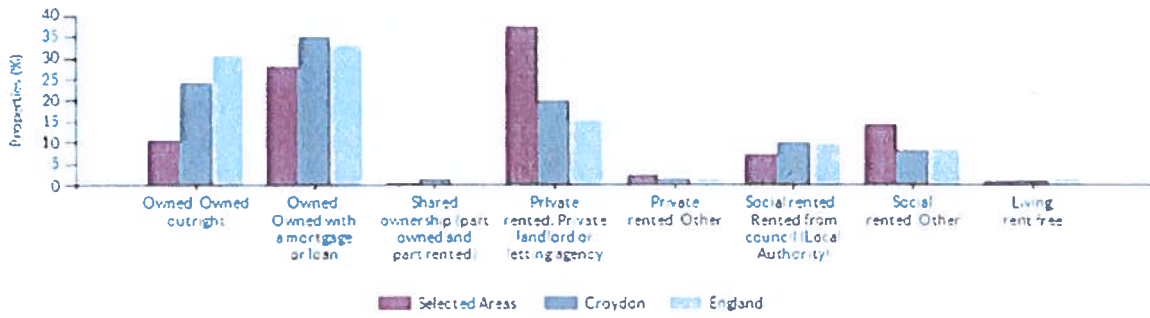
Date 2019 Source ONS

	Selected Areas		Croydon		England	
	Count	%	Count	%	Count	%
Band A	30	2.8	3,820	2.4	5,936,850	24.3
Band B	470	44.3	22,820	14.4	4,789,510	19.6
Band C	350	33	49,480	31.3	5,331,490	21.8
Band D	140	13.2	39,630	25	3,784,070	15.5
Band E	30	2.8	22,610	14.3	2,343,650	9.6
Band F	20	1.9	11,800	7.5	1,239,340	5.1
Band G	20	1.9	7,480	4.7	857,640	3.5
Band H	0	0	640	0.4	144,370	0.6
Band I	0	0	0	0	0	0

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Ownership and tenancy by type



Date: 2011 Source: ONS

	Selected Areas		Croydon		England		
	Count	%	Count	%	Count	%	
Owned: Owned outright	101	10.5	34,882	24.1	6,745,584	30.6	
Owned: Owned with a mortgage or loan	268	27.9	50,348	34.7	7,229,440	32.8	
Shared ownership (part owned and part rented)	1	0.1	1,855	1.3	173,760	0.8	
Private rented: Private landlord or letting agency	358	37.2	28,762	19.8	3,401,675	15.4	
Private rented: Other	22	2.3	1,710	1.2	314,249	1.4	
Social rented	205	21.3	25,887	17.9	3,903,550	17.7	
Social rented: Rented from council (Local Authority)	69	7.2	14,362	9.9	2,079,778	9.4	
Social rented: Other	136	14.1	11,525	7.9	1,823,772	8.3	
Living rent free	7	0.7	1,566	1.1	295,110	1.3	

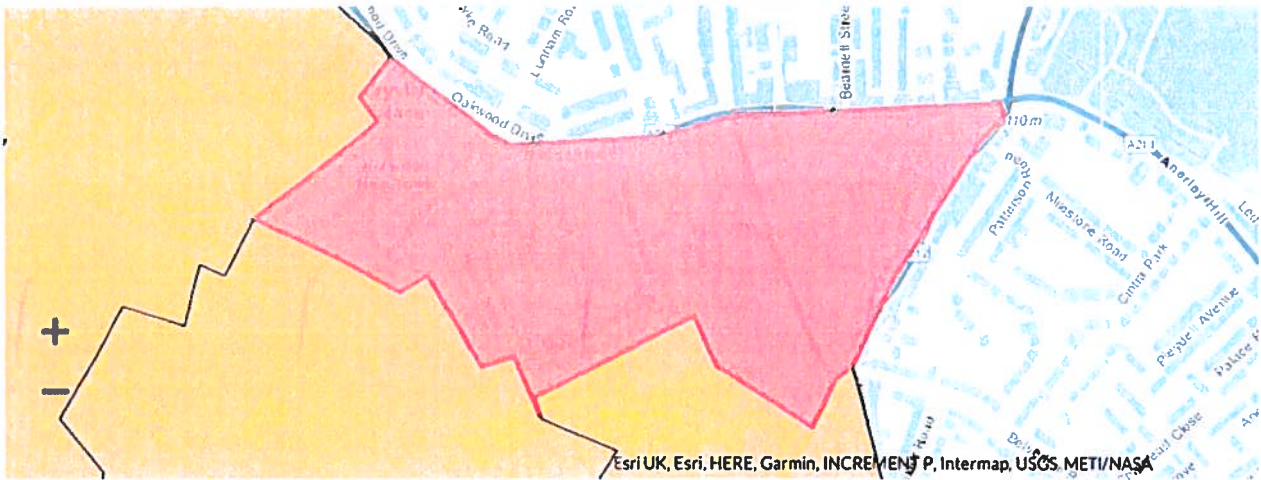
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*This report can be for one or more areas. The figures are aggregated from the selected areas. For rates, values are calculated using the underlying numerator and denominator. The areas selected in this report are: Croydon 001E.

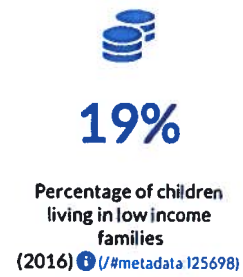
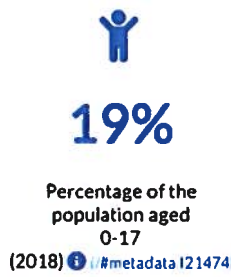
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Children and Young People report for selected areas*

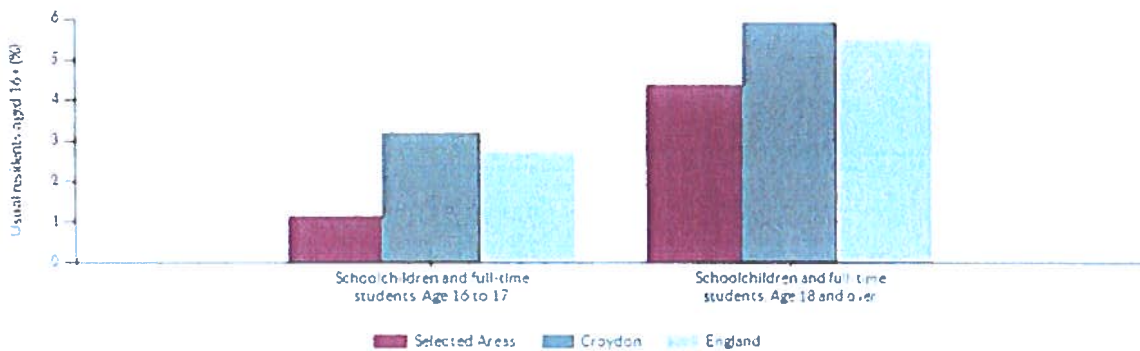
Selected Areas Map



Children and young people at a glance..



Schoolchildren and students

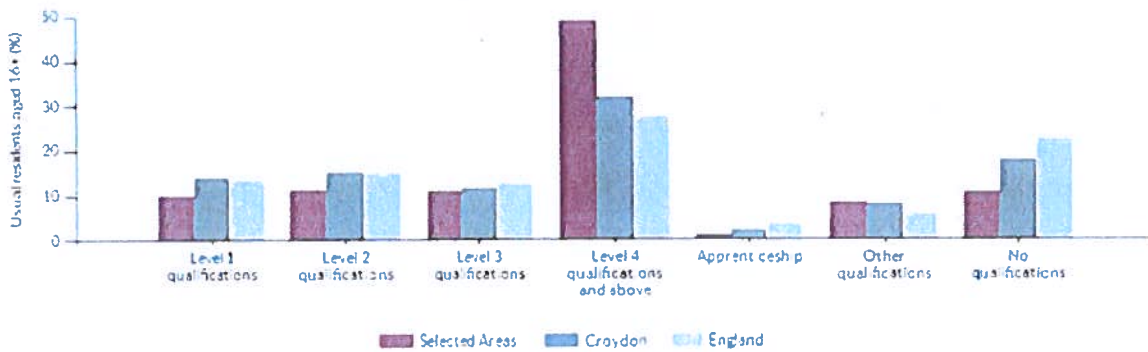


Source ONS Census 2011

	Selected Areas		Croydon		England	
	Count	%	Count	%	Count	%
Schoolchildren and full-time students: Age 16 to 17	18	1.1	9,093	3.2	1,163,148	2.7
Schoolchildren and full-time students: Age 18 and over	69	4.4	16,784	5.9	2,348,197	5.5

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Highest level qualification attained



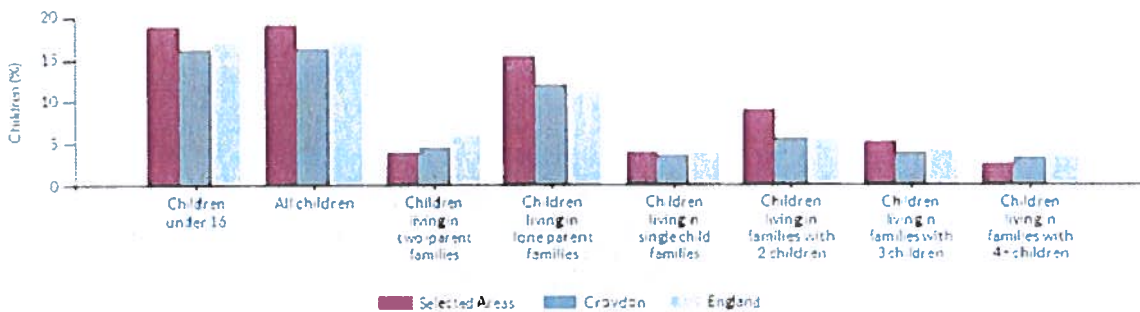
Source: ONS Census 2011

	Selected Areas		Croydon		England		
	Count	%	Count	%	Count	%	
Level 1 qualifications	158	10.0	10	39,285	138	5,714,441	13.3
Level 2 qualifications	176	11.1	43,299	15.2	6,544,614	15.2	
Level 3 qualifications	170	10.7	32,498	11.4	5,309,631	12.4	
Level 4 qualifications and above	772	48.7	90,321	31.8	11,769,361	27.4	
Apprenticeship	14	0.9	6,018	2.1	1,532,934	3.6	
Other qualifications	130	8.2	22,766	8	2,461,829	5.7	
No qualifications	164	10.4	50,081	17.6	9,656,810	22.5	

Qualifications:

- Level 1: 1-4 O Levels/CSE/GCSEs (any grades), NVQ Level 1
- Level 2: 5+ O Level (Passes)/CSEs (Grade 1)/GCSEs (Grades A*-C), 1 A Level/ 2-3 AS Levels/VCEs, NVQ level 2
- Level 3: 2+ A Levels/VCEs, 4+ AS Levels, NVQ Level 3;
- Level 4 and above: Degree (for example BA, BSc), Higher Degree (for example MA, PhD, PGCE), NVQ Level 4-5, HNC, HND
- Other qualifications: Vocational/Work-related Qualifications, Foreign Qualifications (not stated/level unknown).

Children in low income families



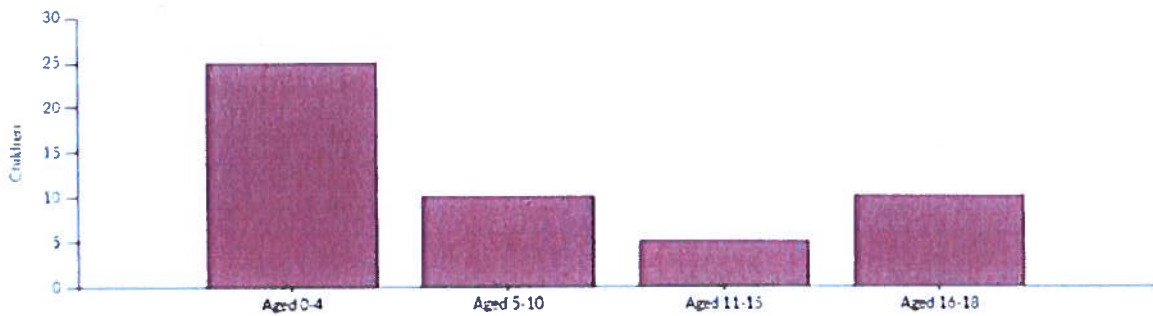
Date 2016 Source: HMRC

These figures show the number of children living in families in receipt of Child Tax Credit whose reported income is less than 60% of the median income, or in receipt of either Income Support or Income-Based Jobseekers Allowance as a percentage of the number of children in families receiving Child Benefit. These statistics are based on a snapshot of several data sources on a specified day (usually 31st August). The data used comes from administrative databases on benefits and tax credits held by the Department of Work and Pensions and Her Majesty's Revenue and Customs. The statistics are based on the finalised awards tax credits data – that is, they are based on a finalised view of family incomes and circumstances - and as such are derived from a full set of administrative records rather than a sample.

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	Selected Areas		Croydon		England	
	Count	%	Count	%	Count	%
Children under 16 living in low income families	65	18.8	12,685	16.1	1,707,835	17
Children living in low income families	75	19	14,835	16.3	1,974,035	17
Children in two-parent families living in low income families	15	3.8	4,020	4.4	680,315	5.9
Children of lone parents living in low income families	60	15.2	10,815	11.9	1,293,720	11.1
Children living in single child low income families	15	3.8	3,290	3.6	439,945	3.8
Children living in low income families with 2 children	35	8.9	4,980	5.5	635,985	5.5
Children living in low income families with 3 children	20	5.1	3,520	3.9	478,330	4.1
Children living in low income families with 4 or more children	10	2.5	3,045	3.3	419,770	3.6

Children in Out of Work Benefit Claimant households

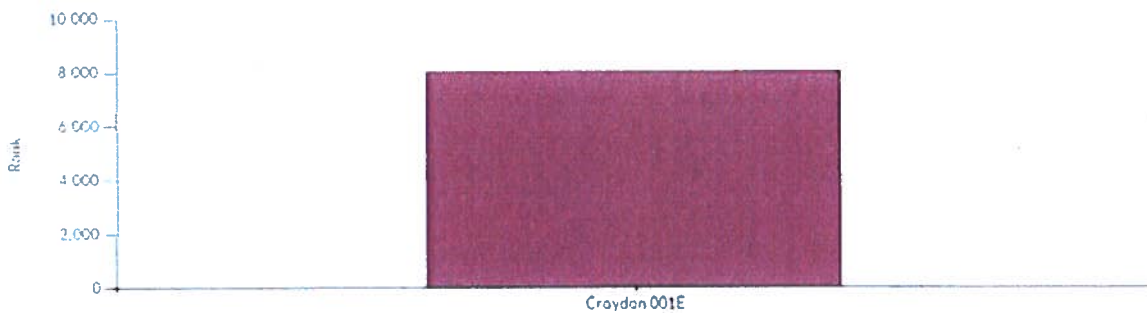


Date: 2017 Source: DWP

	Selected Areas	Croydon	England
Children aged 0-4		25	5,405
Children aged 5-10		10	5,000
Children aged 11-15		5	3,150
Children aged 16-18		10	1,460

These are households where at least one parent or guardian claimed one or more of the following out-of-work benefits: Jobseeker's Allowance, Income Support, Employment and Support Allowance, Incapacity Benefit/Severe Disablement Allowance, Pension Credit or Universal Credit at 31 May of the relevant year. A claimant may be in receipt of a combination of any of these benefits.

Income Deprivation Affecting Children Index



Date: 2019 Source: DCLG

The Indices of Deprivation 2019 ranks every small area (Lower Super Output Area) in England from 1 (most deprived) to 32,844 (least deprived). The IDACI is a subset of the Income Deprivation Domain, with the Index showing the proportion of children aged 0 - 15 in each Lower-layer Super Output Area that live in families that are income deprived (those that are in receipt of Income Support, income-based Jobseeker's Allowance, Pension Credit Guarantee or Child Tax Credit below a given threshold).

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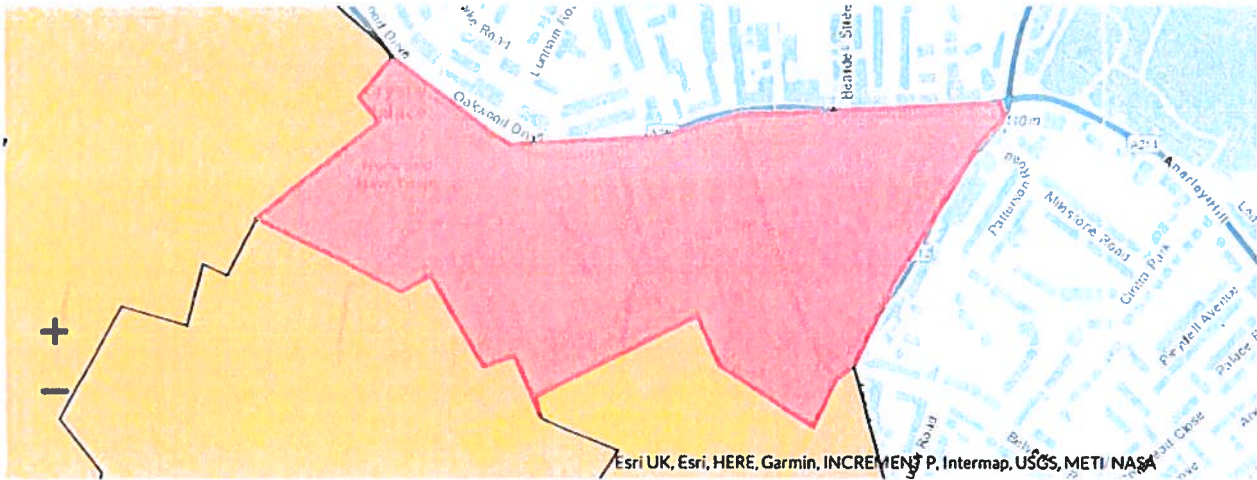
A6 / A1

*This report can be for one or more areas. The figures are aggregated from the selected areas. For rates, values are calculated using the underlying numerator and denominator.
The areas selected in this report are: **Croydon 001E**.

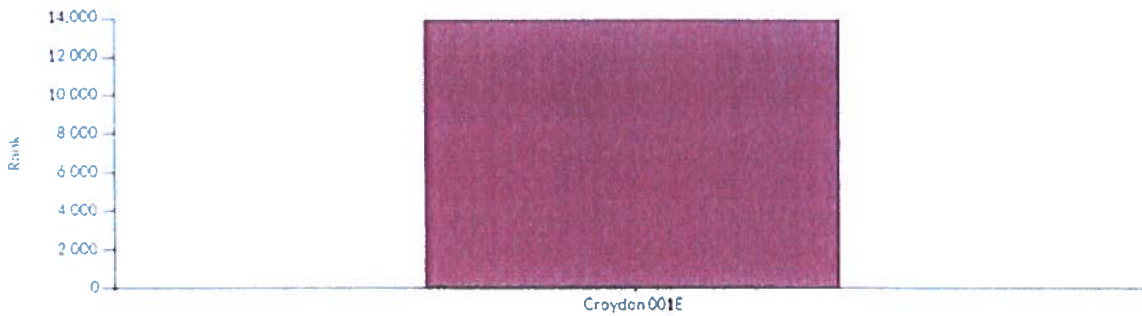
AB / 1

Deprivation report for selected areas*

Selected Areas Map



Index of Multiple Deprivation ranks

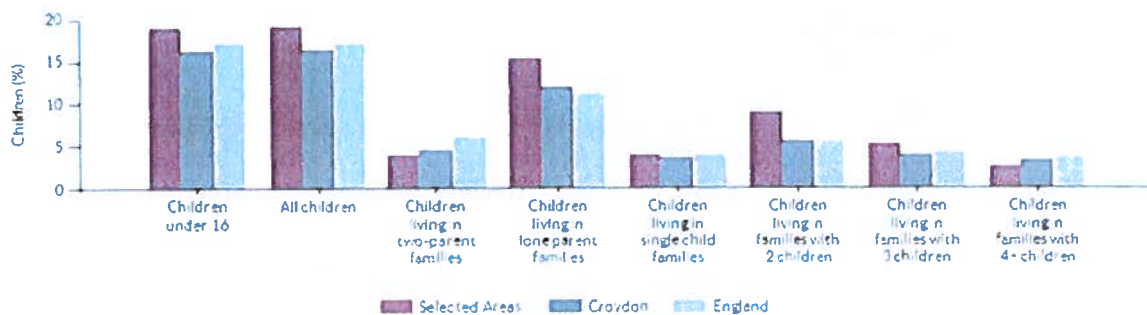


Date: 2019 Source: OCLG

The Index of Multiple Deprivation (IMD) 2019 is the official measure of relative deprivation for small areas (or neighbourhoods) in England. The Index of Multiple Deprivation ranks every small area (LSOA) in England from 1 (most deprived area) to 32,844 (least deprived area).

A6/ 11

Children in low income families

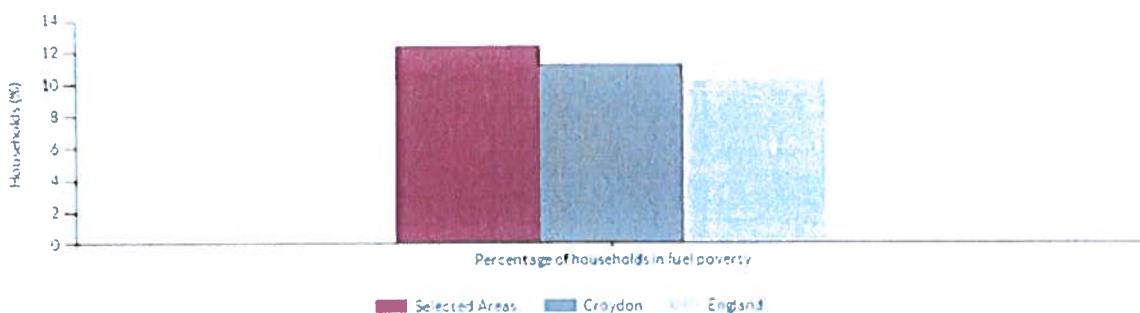


Date 2016 Source HMRC

	Selected Areas		Croydon		England	
	Count	%	Count	%	Count	%
Children under 16 living in low income families	65	18.8	12,685	16.1	1,707,835	17
Children living in low income families	75	19	14,835	16.3	1,974,035	17
Children in two-parent families living in low income families	15	3.8	4,020	4.4	680,315	5.9
Children of lone parents living in low income families	60	15.2	10,815	11.9	1,293,720	11.1
Children living in single child low income families	15	3.8	3,290	3.6	439,945	3.8
Children living in low income families with 2 children	35	8.9	4,980	5.5	635,985	5.5
Children living in low income families with 3 children	20	5.1	3,520	3.9	478,330	4.1
Children living in low income families with 4 or more children	10	2.5	3,045	3.3	419,770	3.6

This is the number of children living in families in receipt of Child Tax Credit whose reported income is less than 60% of the median income, or in receipt of either Income Support or Income-Based Jobseekers Allowance as a percentage of the number of children in families receiving Child Benefit. These statistics are based on a snapshot of several data sources on a specified day (usually 31st August). The data used comes from administrative databases on benefits and tax credits held by the Department of Work and Pensions and Her Majesty's Revenue and Customs. The statistics are based on the finalised awards tax credits data - that is, they are based on a finalised view of family incomes and circumstances - and as such are derived from a full set of administrative records rather than a sample.

Households that experience fuel poverty

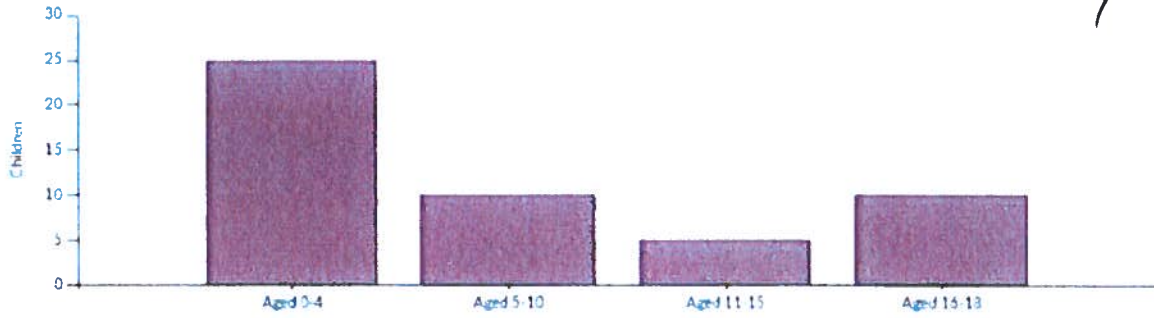


Date 2018 Source BE S

	Selected Areas		Croydon		England	
	Count	%	Count	%	Count	%
Households in fuel poverty	124	12.4	17,108	11.2	2,400,297	10.3

Children in Out of Work Benefit Claimant households

AG / 01



Date: 2017 Source: DWP

	Selected Areas	Croydon	England	
Children aged 0-4	25	5,405	528,100	
Children aged 5-10	10	5,000	532,680	
Children aged 11-15	5	3,150	378,170	
Children aged 16-18	10	1,460	174,000	

These are households where at least one parent or guardian claimed one or more of the following out-of-work benefits: Jobseeker's Allowance, Income Support, Employment and Support Allowance, Incapacity Benefit/Severe Disablement Allowance, Pension Credit or Universal Credit at 31 May of the relevant year. A claimant may be in receipt of a combination of any of these benefits.

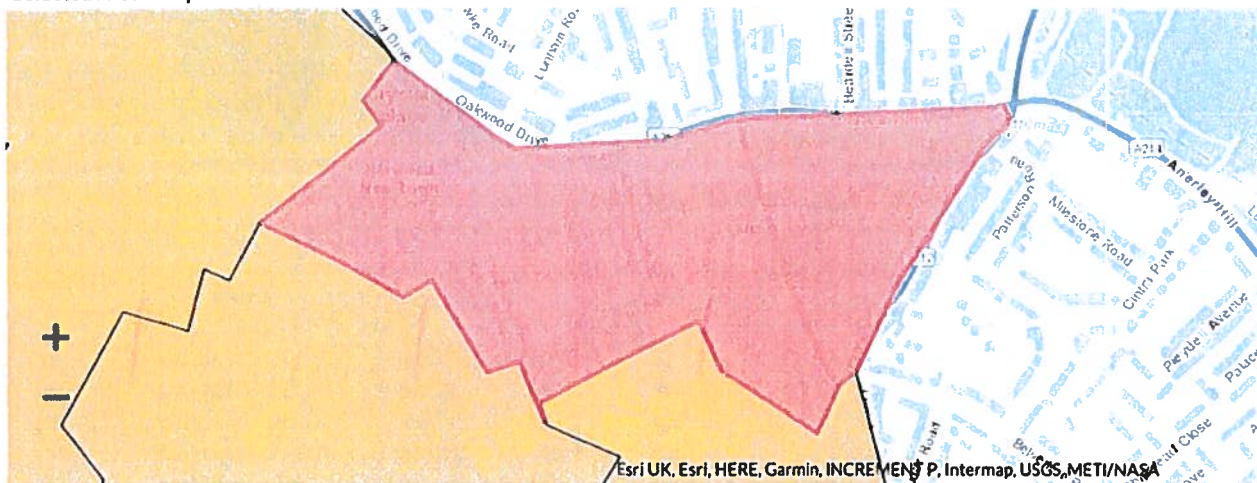
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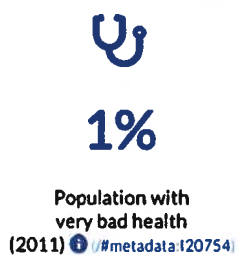
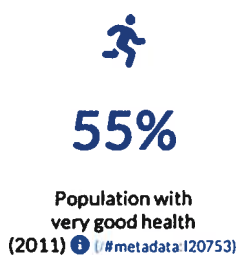
A6/1

Health report for selected areas*

Selected Areas Map

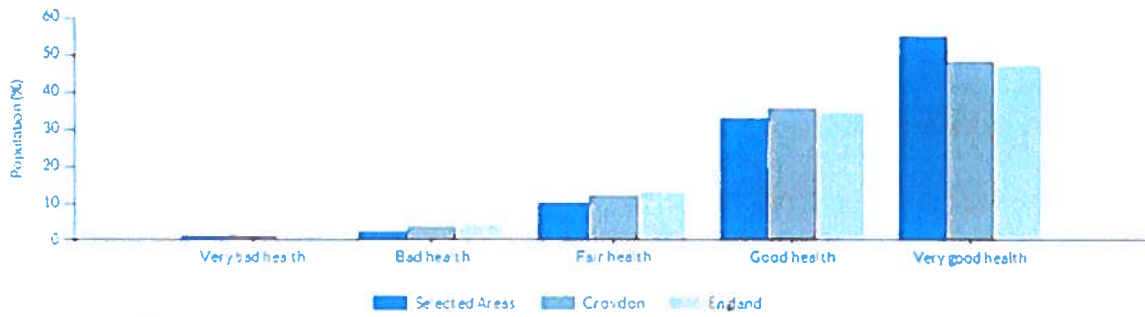


Health at a glance...



A6 / A1

Self-reported health



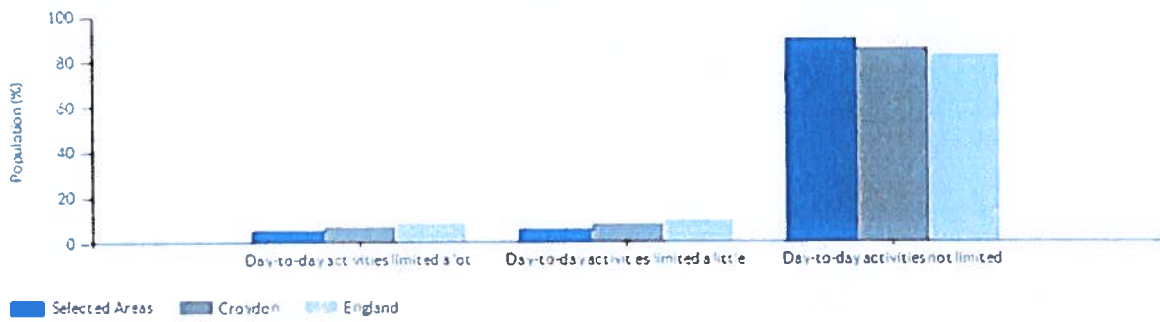
Source: ONS Census 2011

	Selected Areas		Croydon		England		
	Count	%	Count	%	Count	%	
Very bad health	16	0.8	0.8	3,953	1.1	660,749	1.2
Bad health	42	2.2	2.2	12,734	3.5	2,250,446	4.2
Fair health	184	9.7	9.7	43,473	12	6,954,092	13.1
Good health	621	32.6	32.6	128,634	35.4	18,141,457	34.2
Very good health	1,040	54.7	54.7	174,584	48	25,005,712	47.2

General health is a self-assessment of a person's general state of health. People were asked to assess whether their health was very good, good, fair, bad or very bad. This assessment is not based on a person's health over any specified period of time.

AG / AI

Day-to-day activity limited



Source ONS Census 2011

	Selected Areas		Croydon		England	
	Count	%	Count	%	Count	%
Day-to-day activities limited a lot	93	4.9	24,380	6.7	4,405,394	8.3
Day-to-day activities limited a little	107	5.6	28,733	7.9	4,947,192	9.3
Day-to-day activities not limited	1,703	89.5	310,265	85.4	43,659,870	82.4

People were asked to assess whether their daily activities were limited a lot or a little by a health problem, or whether their daily activities were not limited at all.

A6 / ~~A1~~

Provision of unpaid care



Source: ONS Census 2011

	Selected Areas		Croydon		England		
	Count	%	Count	%	Count	%	
Provides no unpaid care	1772	93.1	329,695	90.7	47,582,440	89.8	
Provides 1 to 19 hours unpaid care a week	101	5.3	22,063	6.1	3,452,636	6.5	
Provides 20 to 49 hours unpaid care a week	15	0.8	4,750	1.3	721,143	1.4	
Provides 50 or more hours unpaid care a week	15	0.8	6,870	1.9	1,256,237	2.4	

A person is a provider of unpaid care if they look after or give help or support to family members, friends, neighbours or others because of long-term physical or mental ill health or disability, or problems related to old age. This does not include any activities as part of paid employment. No distinction is made about whether any care that a person provides is within their own household or outside of the household, so no explicit link can be made about whether the care provided is for a person within the household who has poor general health or a long-term health problem or disability.

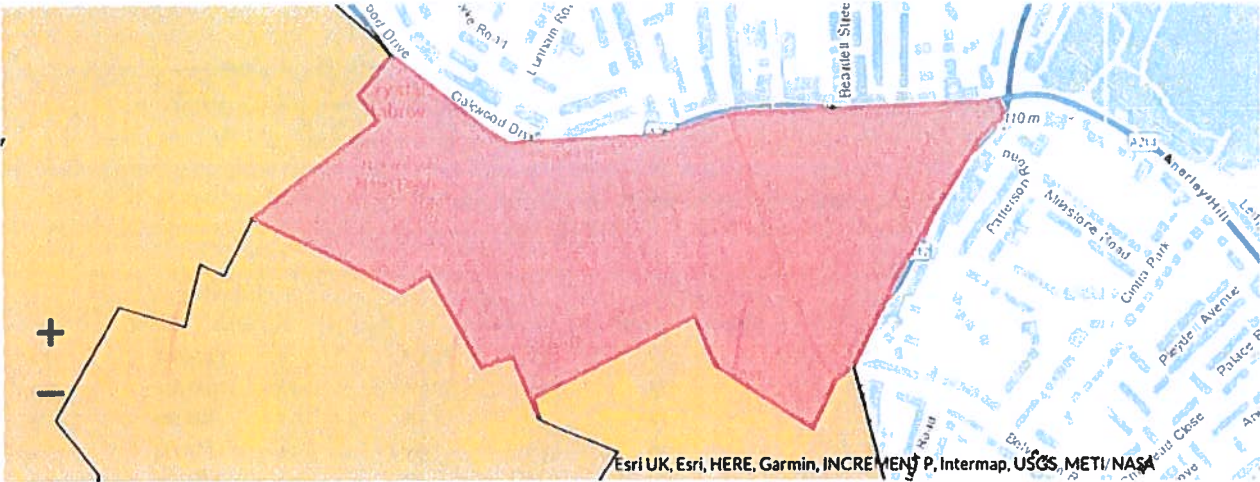
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A6 / 1

Environment report for selected areas*

Selected Areas Map




Environment at a glance...




%

Households with 4+ cars or vans
(2011) ⓘ /#metadata:120848



50%

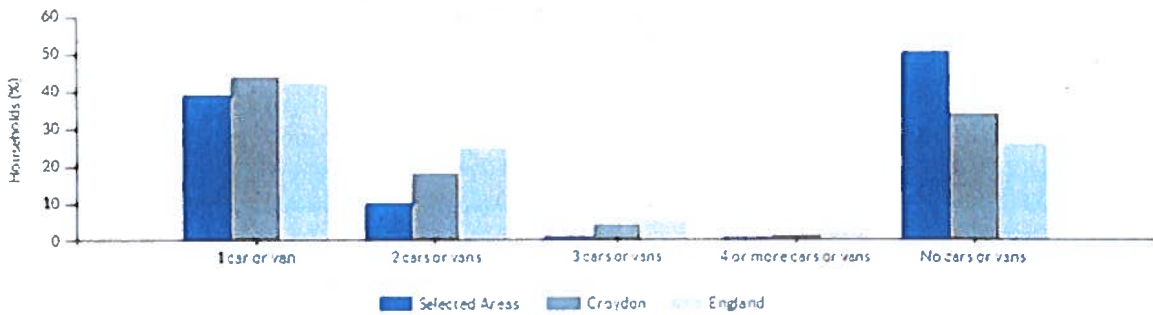
Households with no car/van
(2011) ⓘ /#metadata:120844



4%

Households without central heating
(2011) ⓘ /#metadata:120780

Number of cars or vans per household

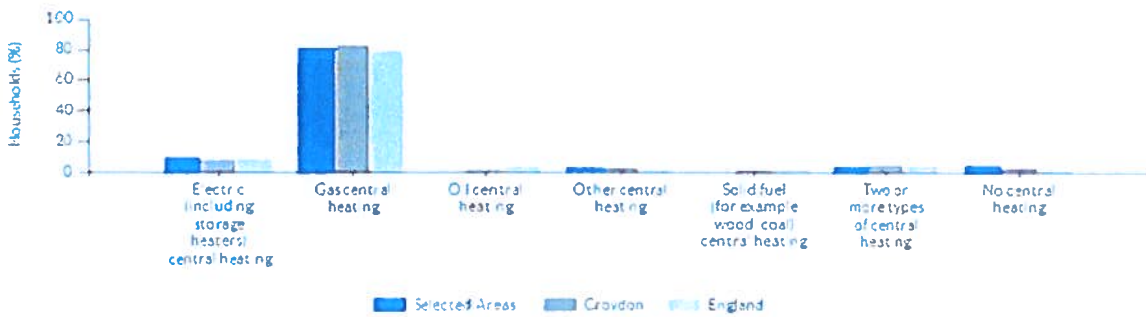


Source: ONS Census 2011

	Selected Areas		Croydon		England	
	Count	%	Count	%	Count	%
1 car or van	375	39	63,183	43.6	9,301,776	42.2
2 cars or vans	93	9.7	25,836	17.8	5,441,593	24.7
3 cars or vans	8	0.8	5,571	3.8	1,203,865	5.5
4 or more cars or vans	4	0.4	1,897	1.3	424,883	1.9
No cars or vans	482	50.1	48,523	33.5	5,691,251	25.8

A6 / ~~A1~~

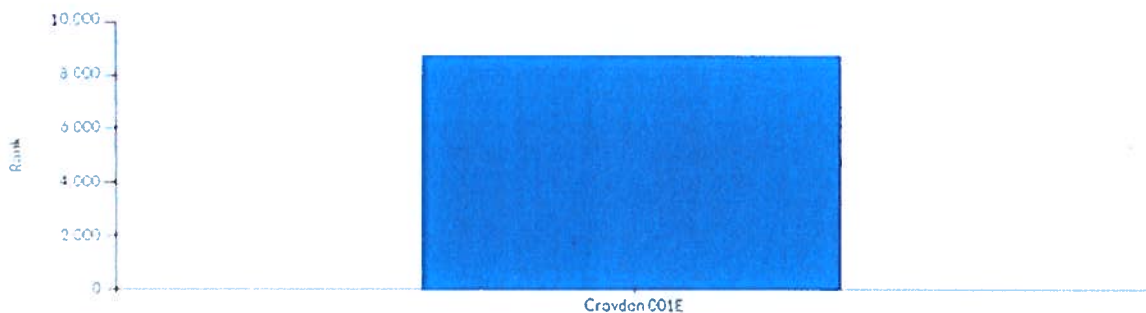
Central heating breakdown



Source: ONS Census 2011

	Selected Areas		Croydon		England	
	Count	%	Count	%	Count	%
Electric (including storage heaters) central heating	89	9.3	11,554	8.3	1,828,589	8.3
Gas central heating	774	80.5	118,850	78.8	17,386,813	78.8
Oil central heating	0	0	178	3.8	848,145	3.8
Other central heating	23	2.4	3,800	1.6	357,916	1.6
Solid fuel (for example wood, coal) central heating	0	0	98	0.7	149,694	0.7
Two or more types of central heating	37	3.8	6,362	4.1	897,650	4.1
No central heating	39	4.1	4,168	2.7	594,561	2.7

Index of Multiple Deprivation - Living Environment domain ranks for Croydon 001E



Date: 2019 Source: DCLG








The Indices of Deprivation 2015 ranks every small area (Lower Super Output Area) in England from 1 (most deprived) to 32,844 (least deprived). The Living Environment Deprivation Domain measures the quality of the local environment. The indicators fall into two sub-domains. The 'indoors' living environment measures the quality of housing; while the 'outdoors' living environment contains measures of air quality and road traffic accidents.

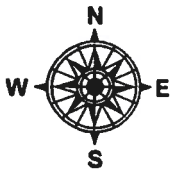
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Gipsy Hill Ward

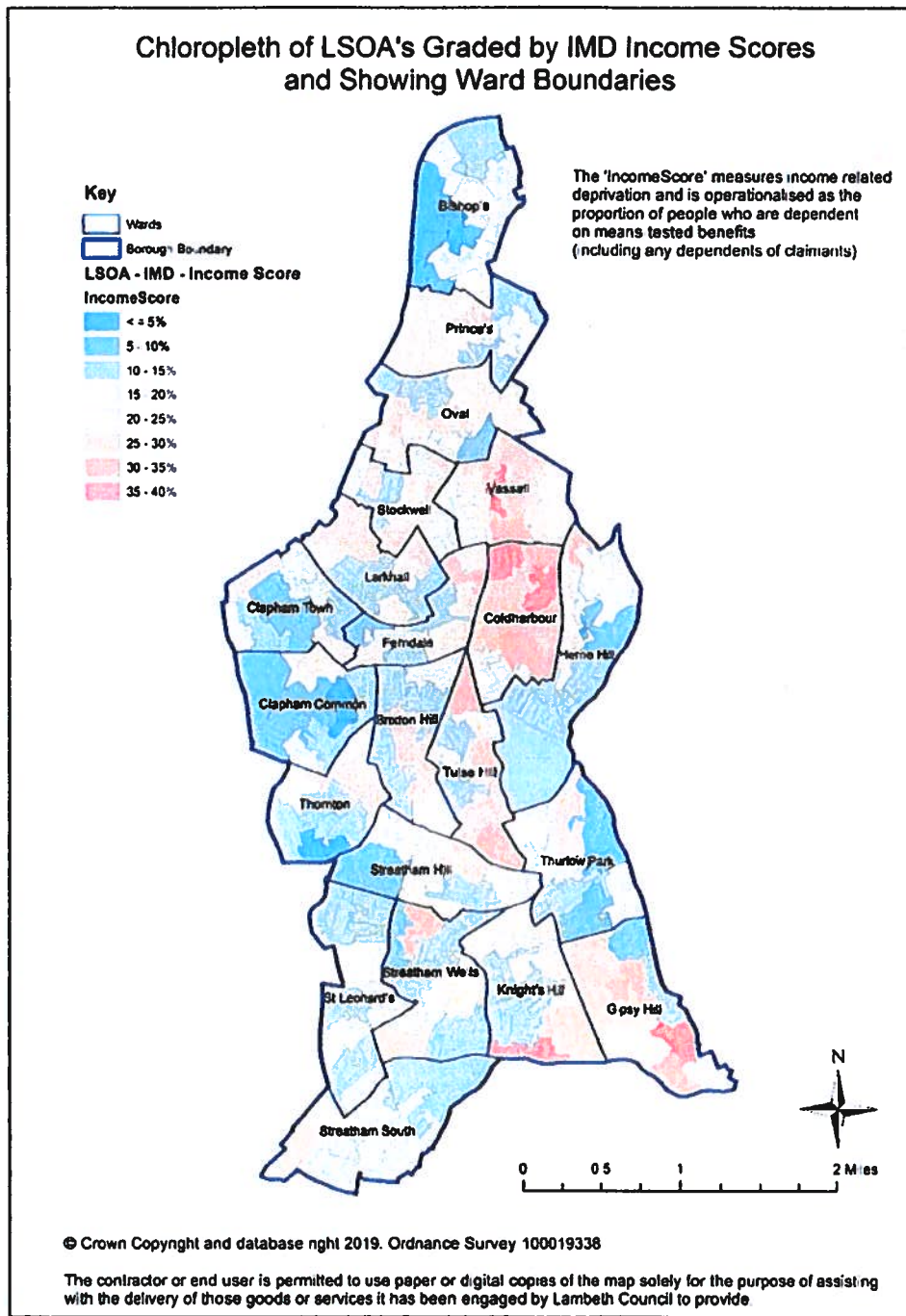


- Key**
-  Core Council Buildings
 -  Housing Estates
 -  Library
 -  BR Train Station
 -  Underground Station
 -  Parks and green spaces
 -  Borough Boundary



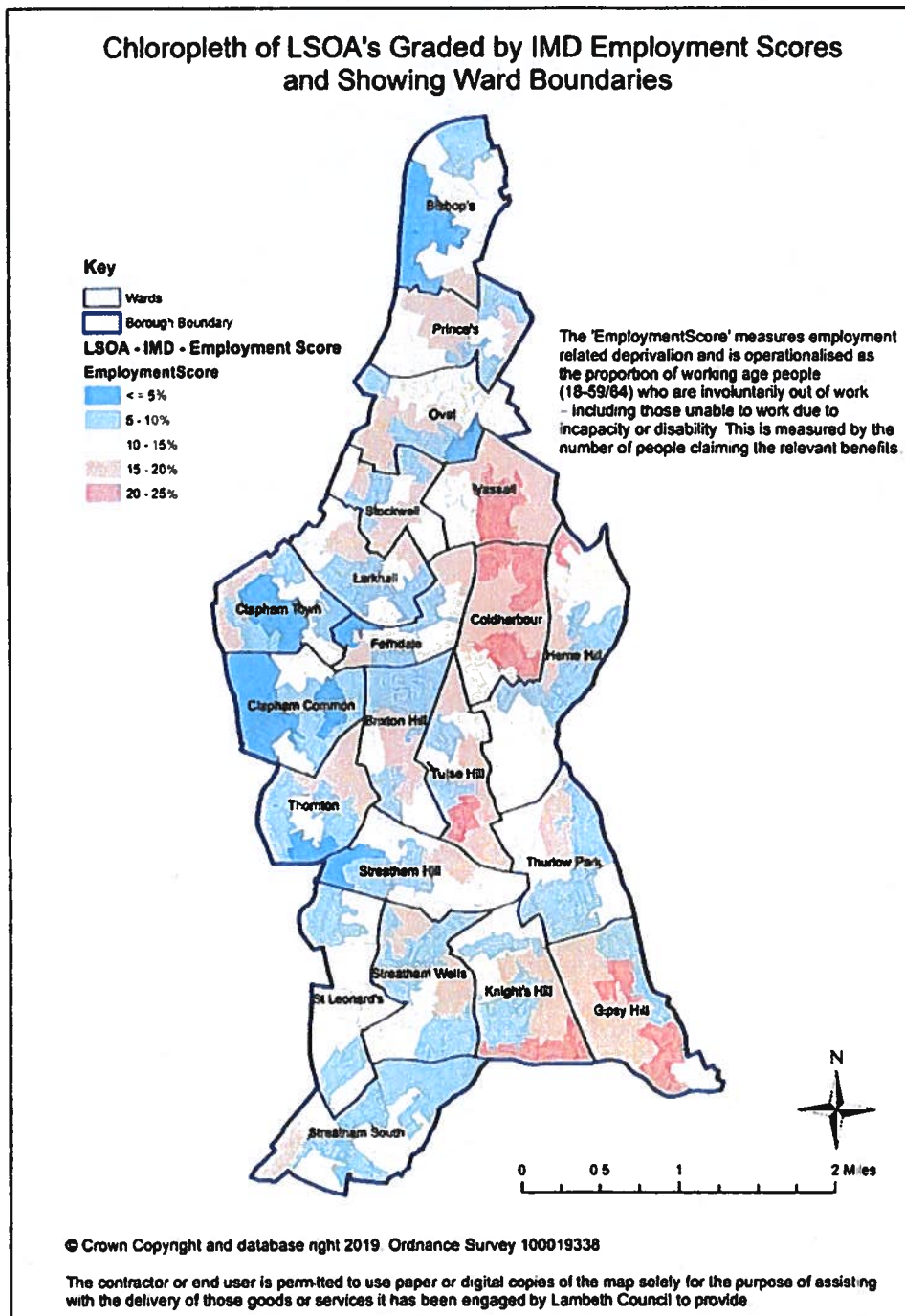
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MAP 4: LSOAs Graded by IMD Income Scores Showing Ward Boundaries

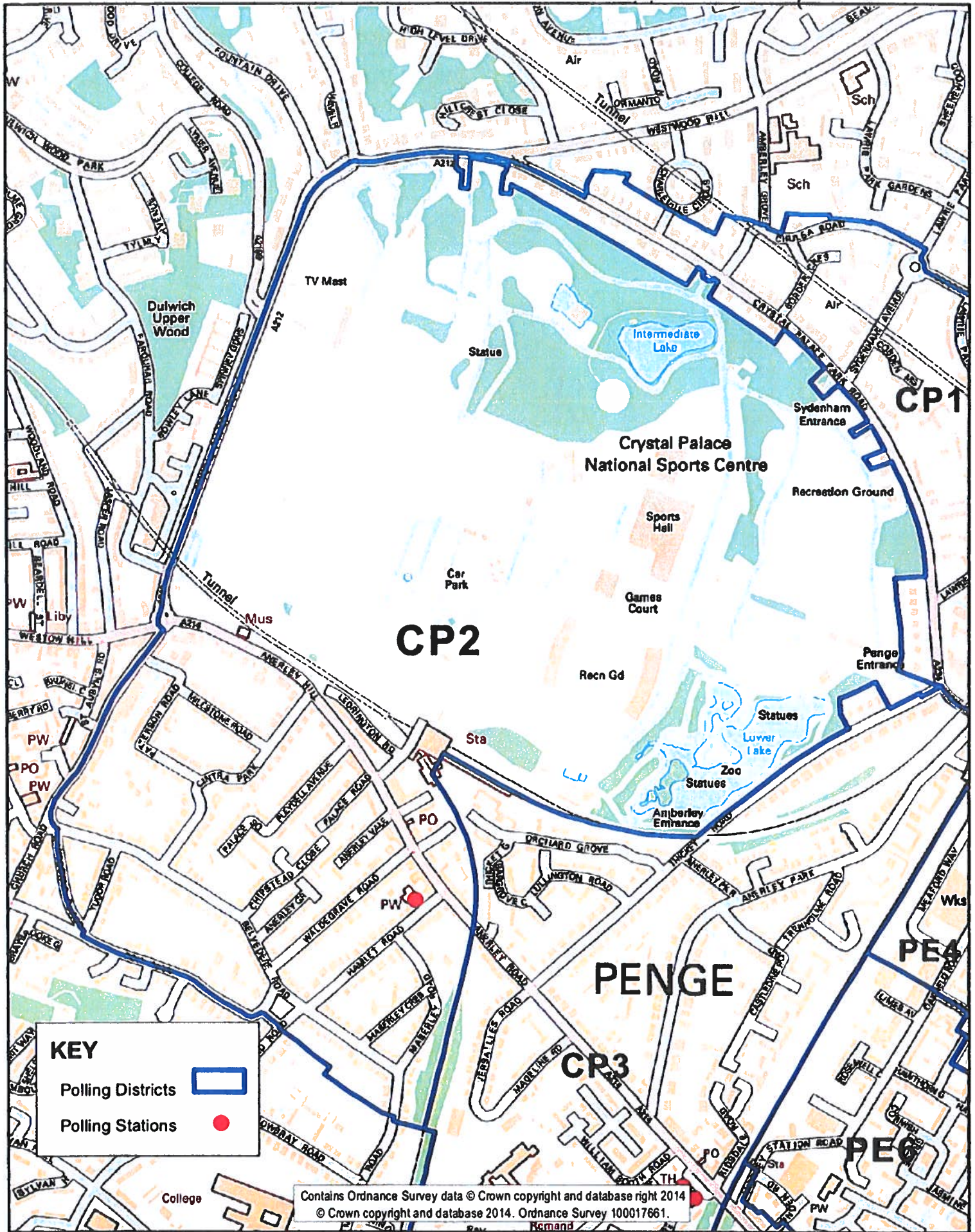


4.5 Map 4 is a visual representation of the most income deprived areas in Lambeth. Each lower super output area (LSOA) is colour coded to represent the proportion of the population in that locality who are dependent on means-tested benefits. It shows that for large areas in Coldharbour, Vassall, Tulse Hill and Gipsy Hill wards it is common that over 25% of the population are dependent on means-tested benefits, and in some instances up to 40%.

MAP 5: LSOAs Graded by IMD Employment Scores Showing Ward Boundaries



4.6 Map 5 is a visual representation of the most employment deprived areas in Lambeth. Each lower super output area (LSOA) is colour coded to represent the proportion of the population in that locality who are involuntarily out of work. It shows that for large areas in Coldharbour, Vassall, Knight's Hill and Gipsy Hill wards it is common for between 15 - 25% of population to be involuntarily out of work.



TOWN PLANNING



JIM KEOE
 CHIEF PLANNER,
 CIVIC CENTRE,
 STOCKWELL CLOSE,
 BROMLEY, KENT, BR1 3UH.
 Tel: 020 8464 3333

**London Borough of Bromley
 Electoral Polling District - CP2**

Scale 1:7,500



01/09/14

Plan No. CP2

A6 / 4A

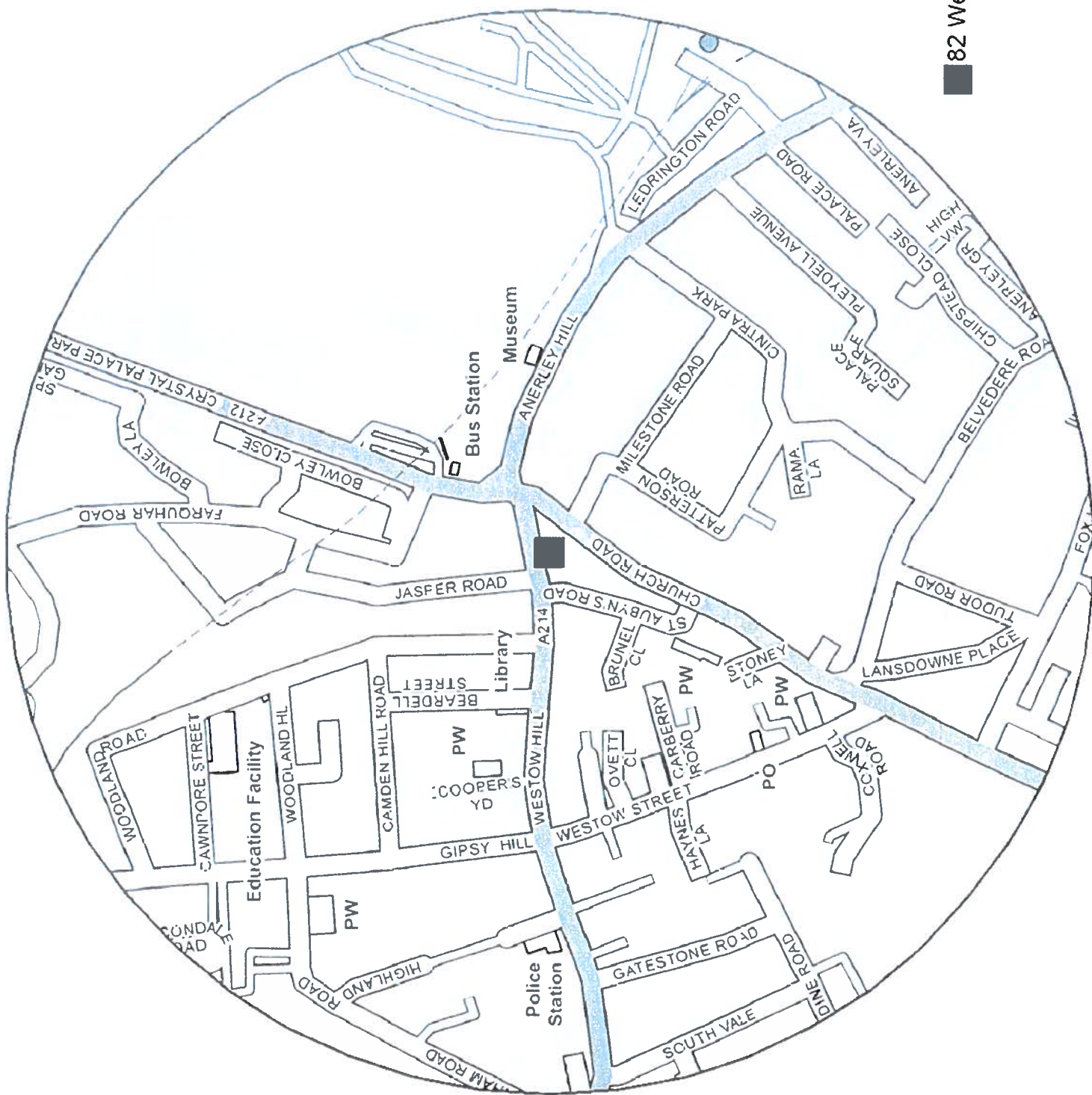
Period	ASB Incidents	Crime Count	CCHI
Previous 6 months	64	359	14550.75
Rolling 6 months	68	323	20480.25
# Difference	4	-36	5929.5
% Difference	6.3%	-10.0%	40.8%

Previous 6 months = 1 April 2019 – 30 September 2019

Rolling 6 months = 1 October 2019 – 31 March 2020

500 metre radius of SE19 1SB

82 Westow Hill



I wish to object to the new License application for Reels Casino Slots, 82 Westow Hill, Upper Norwood SE19 1SB, that borders Croydon and Lambeth and Bromley licencing teams. Cross border representations are recommended to be requested for this unique cross border venue.

Licensing: <https://www.croydon.gov.uk/business/licences/current-licensing-applications>

Application: https://www.croydon.gov.uk/sites/default/files/Reels_Casino_Slots%2C_82_Westow_Hill%2C_Upper_Norwood%2C_SE19_1SB.pdf

The current application looks to have provided insufficient information on the application for concerns for an Adult Gambling Centre at this high street location. For example, but not limited to, omitting detailed times of operations and access restrictions. The local area is a major transport interchange required by many local schools, linking 13 daytime bus routes, and linking inner and outer London. This town centre venue has above average number of school student demands during term times. This means there are above average number of school children in early mornings and afternoons by this venue. The area also has a large number of cross border late night licensed venues, and increase in cocktail bars (now three in very short distance away) and many late night bars. The local area also is hot spot for ASB and crime in the town centre. Based on the current and limited application information:

- The application provides insufficient consideration or mitigation for the protection of children from harm for this unique location and its high number of local school children expected during term times.
- The application does not detail steps to be taken in promoting the licensing objectives for this sensitive High Street location and next to multiple (and cross border) late night licenced venues.
- For this location, restrictions are needed to appropriately limit access of children under 18 to premises where these licensable activities are being carried out.
- The application fails to show detailed times of operations and its access restrictions, or the type of gambling to be provided, or safety details within the venue to mitigate concerns.
- This District Centre and its high streets has known local issues with gangs, drugs and ASB. On the adjoining Town Centre High Street, the Police supported planning objections to a venue (19/03600/FUL) that included concerns for ASB and local drug issues.
- Due to exceptional number of school children and very close proximity next to Crystal Palace Bus Station and interchange bus stops, the measures such as doorbell entry are required at times school children and those under 18 will be expected in larger numbers, and restricting opening hours to after 9.30AM and between 3.30pm and 6.30pm.
- Late night opening hours should not be later than 11pm every day, or as recommended by the Police due to the exceptional high number of late night and **cross border** licenced venues in less than 200m distance: The Westow pub, The Grape and Grain (to re-open as the Royal Crystal Palace pub), The Cocktail Embassy, The Escape Bar and Cocktails, Memory Box cocktail Tropical drink bar & restaurant, the Coopers Pub (soon to open), the Royal Albert Pub, and with many more licenced bars and restaurants further along Westow Hill and Westow Street and Church Road in this district centre. This will reduce worsening of ASB and drug related issues, at a location next the town centre's highest concentration of late

night licenced venues, and where there is a combined taxi/mini cab areas that attracts many to loiter late at night.

It is unclear if the related planning application has been granted ([20/00441/FUL](#)) will be used to qualify this application for opening times, or, if new times are proposed.

Is there other supporting License information being provided to allow this application to be assessed (in which case can this be shared), or is the decision being based only on this information on this application (as attached)?

The provided Local Area Profile is misleading in a number of areas, that will need time to fully assess. For example, but not limited to:

1. The applicant has not fully assessed this site as a cross border location that directly impacts existing local crime hot spots within 200m of the site, impacting Lambeth and Bromley and Croydon.
2. Attached are crime reports from <https://www.ukcrimestats.com/MembersArea/Heatmap/> . These reports indicate the site is located by cross border crime hot spots historically (over the last 10 years) and in the last year impacting Westow Hill.
3. Crystal Palace town centre is not simply characterised as a “small retail” area as suggested by the applicant. This is one of Croydon’s larger district town centres known for its night time economy with its high number of licenced venues and pubs over the three boroughs that comprise the centre.
4. Anti Social Behaviour (ASB) and crime risks need to be assessed for the **cumulative impact** of licenced venues (and the cumulative **total alcohol drinking floor space** locally) in this part of Crystal Palace. Such an assessment will give the scale of late night footfall and risks from adult licenced venue closing times.
5. Further consideration for Cumulative Impact Zone also should be considered with cross border authorities due to the intensification of late night licenced venues in this area. Crystal Palace is also seeing the cumulative impact from increased Crystal Palace Park major events, now planned to be up to 45,000 capacity from 2021. <http://crystalpalacepark.org.uk/news/festival-republic-events-proposal/>
6. The site has Lambeth licencing responsible for the other side of Westow Hill, and nearby on Church Road it has Bromley overseeing licencing of the multi-screen cinema and approved new and expanded pub on the corner of Westow Hill and Church Road.
7. There are now **three late night bars** operating by this venue that all promote cocktails services: There is the Cocktail Embassy, Escape Caribbean Tapas and Cocktail Bar, MemoryBox Cocktail Bar and restaurant (Opening) all on Westow Hill less than 100m away. A site visit is recommended.
8. The Bromley approved and expanded Weatherspoons Pub (less than 100m away) will have drinking space over **3 floors** (junction with Westow Hill/Anerley Hill). Other nearby pubs/licenced drinking by Westow Hill are: Westow Pub, Coopers Arms (opening), The Albert, 4 screen Everyman Cinema (Church Road), Fabor Fox, Walter Briggs, Sparrow Hawk.
9. **The risks for ASB and increased loitering in this area late at night will be made worse by this adult licenced gambling venue. This will risks a**

cumulative knock on adverse harm to residents with crime, ASB and noise.

10. There applicant fails to appreciate significance of 13 day time bus routes that meet by this site, and as act a significant transport interchange serving multiple local schools in South East London.
11. Crystal Palace has x14 secondary schools (or teaching 16+) within 2 miles, (and x31 within 3 miles). The topology of South London bus routes, means that most of these schools have bus services that go via Crystal Palace, where 13 bus routes all meet. The applicant's statement to assess the impact on school children under 18 who will passing within 100m of this site is **insufficient in these particular local circumstances**. The likely passing school children will be greater than as presented by the applicant and is a significant concern. A doorbell entry or other door security is needed if the venue is open during am or pm school travel times, or for the opening hours to be restricted over these hours
 - o E.g search by SE19 ant this site that maps schools to assess the **schools transport impact at Crystal Palace**.
<https://get-information-schools.service.gov.uk/Establishments/Search?tok=0qZZGcy4>

If time allows, I hope to provide further supporting evidence of concerns raised.

A7

Show crimes within Postcode 1/4 mile radius

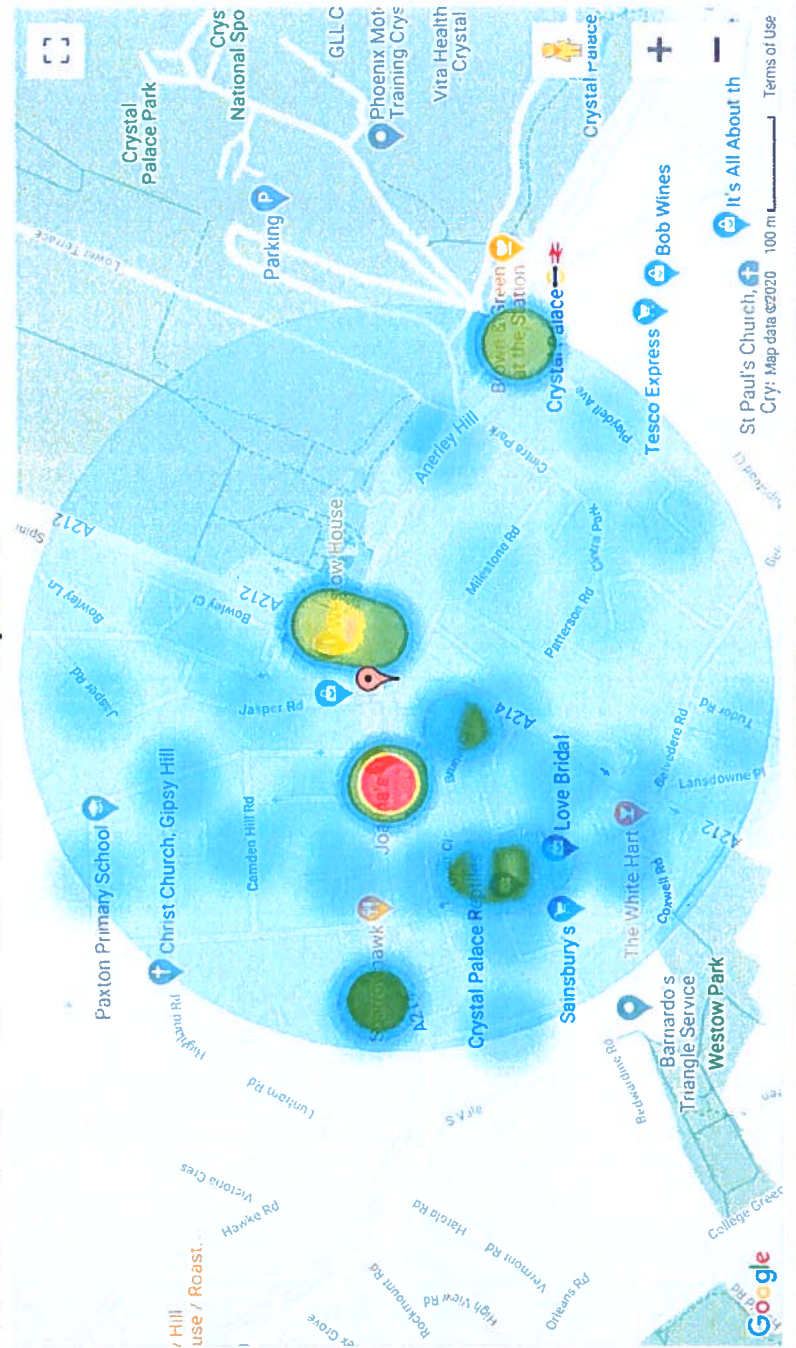
between: and:

Select all | Unselect all

- Anti-social behaviour
- Burglary
- Other crime
- Robbery
- Vehicle crime
- Violence and sexual offences
- Public Disorder and Weapons
- Shoplifting
- Criminal Damage and Arson
- Other Theft
- Drugs
- Bicycle theft
- Possession of weapons
- Public order
- Theft from the person

Get Report Reset Export all crimes to CSV

SE191SB Between December 2010 and July 2020



ASB	Burglary	Other	Robbery	Vehicle	Violent	Shoplifting	CD&A	Other Theft	Drugs	Bike Theft	Theft From the Person	Weapons	Public Order	Total Selected
2414	646	303	510	1060	364	400	684	92	235	46	92	25	258	7037

Show crimes within 1/4 mile radius

between: and:

Select all | Unselect all

- Anti-social behaviour
- Burglary
- Other crime
- Robbery
- Vehicle crime
- Violence and sexual offences
- Public Disorder and Weapons
- Shoplifting
- Criminal Damage and Arson
- Other Theft
- Drugs
- Bicycle theft
- Possession of weapons
- Public order
- Theft from the person

Get Report

Reset Export all crimes to CSV

SE191SB Between July 2019 and July 2020



ASB	Burglary	Other	Robbery	Vehicle	Violent	PD&W	Shoplifting	CD&A	Other Theft	Drugs	Bike Theft	Theft From the Person	Weapons	Public Order	Total Selected
287	41	34	43	43	159	0	35	29	43	35	4	7	7	39	763

7

From: Mann, Stephen
Sent: 20 August 2020 17:32
To: LICENSING <LICENSING@croydon.gov.uk>
Cc:
Subject: Re: Reels Casino slots 82 Westow Hill licensing

Thanks I'd like to link to 1 and 3

The opening hours are simply too long. They are designed to respond to the pubs and should be shortened to afternoon opening.

There is a spike in ASB in the area linked to some of the historic gambling uses and the presence of the barnados site and vulnerable communities on the Central Hill Estate make it likely vulnerable people will suffer through the existence of this facility.

Further comments to follow to support these.

From: LICENSING <LICENSING@croydon.gov.uk>
Sent: Thursday, 20 August 2020, 14:50
To: Mann, Stephen
Cc:
Subject: RE: Reels Casino slots 82 Westow Hill licensing

Dear Councillor Mann,

The last date to make representation on this application is the 17.09.2020.

Any representation would need to link to one or more of the three licensing objectives, 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 persons from being harmed or exploited by gambling.

There is also a planning condition limiting the hours of use to Monday to Sunday 08:00 to 23:00

If you require any further information please let me know.

Regards

Licensing Officer

From: [Stephen](#)

Sent: 24 August 2020 09:02

To:

82 Westow Hill AGC

I have spoken to a QC this morning to seek advice on this licensing application and planning consent. I would like to ask the following questions and add these to my objections to the licensing application for 82 Westow Hill.

would it be possible to have the latest Croydon Gambling Statement of Principles and the Local Area Profile Gambling Upper Norwood (and going into neighbouring boroughs where appropriate) as per our Gambling Policy? Given the close proximity to the deprived central hill estate I have serious concerns about impact here with problem gambling.

Could I have the full application, the licence plan and the risk assessment as provided by the applicant?

Pg14 of our policy states a lot of measures will be considered to meet the licensing – we believe that there is a need for doorstaff to man this property given the high number of children congregating through the triangle given the number of schools in the area – can this be provided as a condition. We have doorstaff on most pubs at busy times. This should be replicated.

We had historic problems with loitering, and aggressive begging around the historic bookies here and the old William hill linked to the local homelessness hostel. This has reduced since these shut. I have serious concerns the loitering will return. Where people do loiter this is outside 6 and 82 Westow Hill which, in my eyes displays a clear linkage between the gambling use of these premises and this activity.

CP is a significant gathering point for local schools as referenced and I have serious concerns about the impact on the number of school children potentially affected by this venue – particularly as said above if doorstaff are not provided.

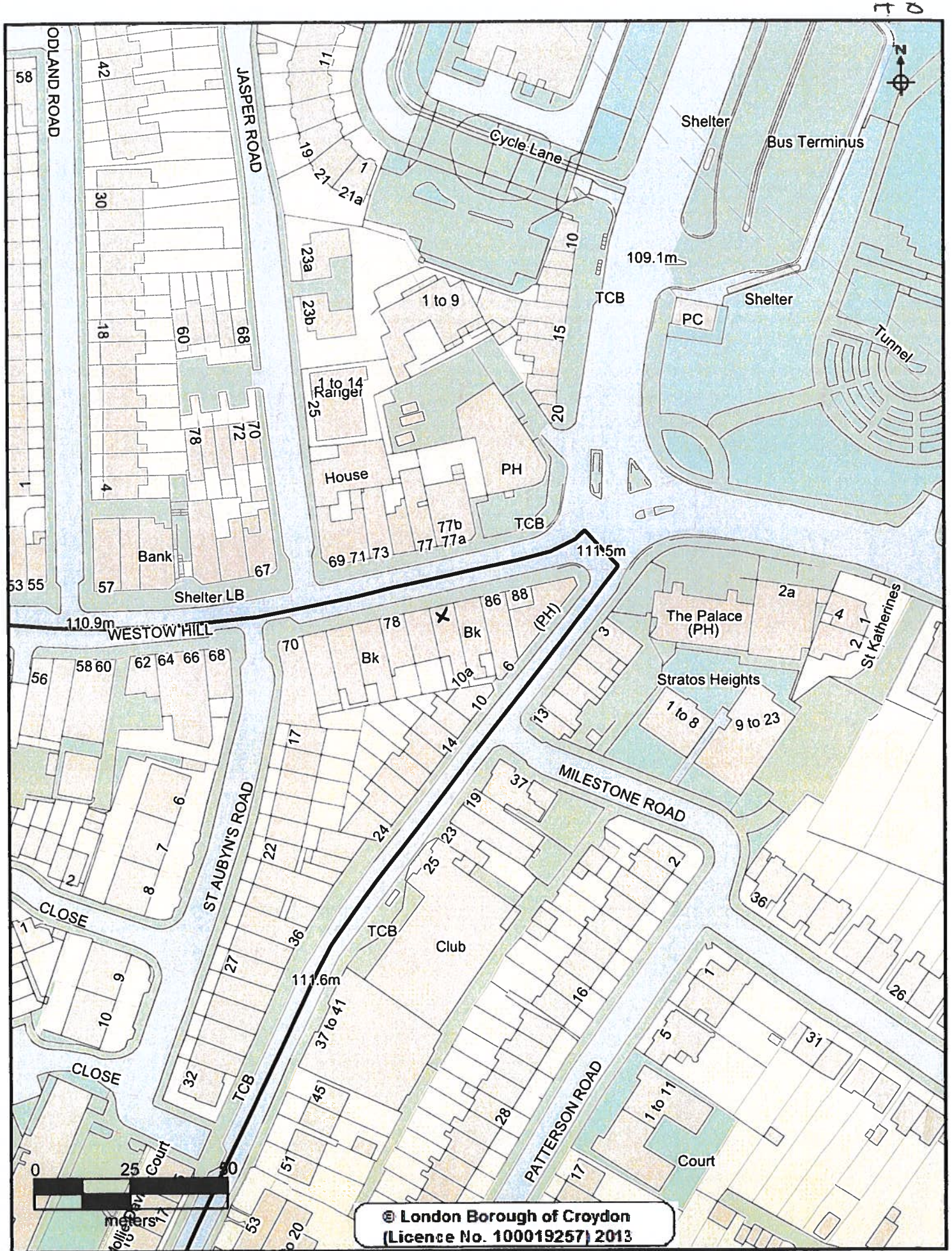
Thank you for circulating the Local Area Profile.

In addition to my below comments and the original objection I would like to add:

- 1) My concern that the applicant has failed to request a LAP suggesting they do not properly understand or take an interest in the specifics of this local area.
- 2) The close proximity of the local hostel presenting increased risk to an already vulnerable group and with links to the recent history of aggressive begging outside the licensed premises
- 3) The LAP demonstrates the high proportion of schools in the area and doorpeople are surely required to tackle this matter
- 4) I also strongly encourage a reduction in hours from that proposed.
- 5) This is a major district centre and the dismissing of this by the applicant demonstrates further their failure to properly understand the environment they are operating in.
- 6) As raised separately by [redacted]. I agree with the view that: The risks for ASB and increased loitering in this area late at night will be made worse by this adult

licenced gambling venue. This will risks a cumulative knock on adverse harm to residents with crime, ASB and noise.

Councillor Stephen Mann
Town Hill
Katherine Street
Croydon
CRO 1NX
stephen.mann@croydon.gov.uk



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