



SUMMONS AND AGENDA

LICENSING COMMITTEE

Date: TUESDAY, 14 MAY 2024 at 7.00 pm

Via Microsoft Teams - the public are welcome to observe via the Council's website at <https://lewisham.public-i.tv/core/portal/home>

Enquiries to: Clare Weaser
Email: clare.weaser@lewisham.gov.uk

MEMBERS ARE SUMMONED TO ATTEND THIS MEETING

Councillors:

Councillor Yemisi Anifowose (Chair)
Councillor Coral Howard (Vice-Chair)
Councillor Bill Brown
Councillor Mark Jackson
Councillor Eva Kestner
Councillor Atkinson
Councillor Natasha Burgess
Councillor Billy Harding
Councillor Rachel Onikosi
Vacancy

Jeremy Chambers, Monitoring Officer
Laurence House
Catford
London SE6 4RU
Date: 3 May 2024

The public are welcome to attend our committee meetings, however occasionally committees may have to consider some business in private.

ORDER OF BUSINESS – PART 1 AGENDA

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The public are welcome to attend our Committee meetings, however, occasionally, committees may have to consider some business in private.



Licensing Committee

Minutes

Date: 14 May 2024

Key decision: No

Class: Part 1

Ward(s) affected: All

Contributors: Head of Governance and Committee Services

Outline and recommendations

Members are asked to consider the Minutes of the meetings of the Licensing Committee, held on 13 and 14 March and 4 April 2024.

Recommendation

That the Minutes of the meetings of the Licensing Committee, held on 13 and 14 March and 4 April 2024 be confirmed and signed.

Public Document Pack

LONDON BOROUGH OF LEWISHAM

MINUTES of the meeting of the LICENSING COMMITTEE, which was open to the press and public held on 13 MARCH 2024 at 10am and held remotely via Microsoft Teams.

Present

Councillor Wise (Chair) Councillors Howard, and Shrivastava.

Apologies for absence were received from Councillors Anifowose, Atkinson, Brown, Huynh, Jackson, Kestner and Warner.

Also Present

Matt Lewin - Legal adviser
Angela Mullin-Murrell - Safer Communities Officer.

Silks 177 – 181 Rushey Green Catford London SE6 4BD

Applicant

James Rankin – On behalf of the Metropolitan Police

Objector

David Dadds – Solicitor on behalf of the applicant
P.C Pearce

1. Declarations of Interests

None.

2 Exclusion of the Press and Public

RESOLVED

In accordance with regulation 4 (2) (b) of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 and under Section 100(A)(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 they involve the likely disclosure of exempt information as defined in paragraphs 1 and 3 of Part 1 of Schedule 12(A) of the Act, and the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

3. Silks 177 – 181 Rushey Green Catford SE6 4BD

The following is a summary of the item considered in the closed part of the meeting:

3/4. Silks 177 – 181 Rushey Green Catford London SE6 4BD

Items 3 and 4 were considered together.

RESOLVED that the conditions of both licences be modified as follows:

- (a) the opening hours of the Premises on Friday-Saturday shall be 09.00-01.00; and
- (b) the sale of alcohol on Friday-Saturday shall be 09.00-00.00.

The meeting ended at 10.02a.m

Chair

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LONDON BOROUGH OF LEWISHAM

MINUTES of the meeting of the LICENSING COMMITTEE, which was open to the press and public held on 14 MARCH 2024 at 12.45 pm and held remotely via Microsoft Teams.

Present

Councillor Wise (Chair) Councillor Anifowose (Vice-Chair) Councillors Howard, and Kestner.

Apologies for absence were received from Councillors, Atkinson, Brown, Huynh, Jackson, Shrivastava and Warner.

Also Present

Matt Lewin - Legal adviser
Angela Mullin-Murrell - Safer Communities Officer.

Silks 177 – 181 Rushey Green Catford London SE6 4BD

Applicant

James Rankin – On behalf of the Metropolitan Police
P.C Gillian Pearce

Objector

David Dadds – Solicitor on behalf of the applicant

1. Declarations of Interests

None.

2 Exclusion of the Press and Public

RESOLVED

In accordance with regulation 4 (2) (b) of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 and under Section 100(A)(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 they involve the likely disclosure of exempt information as defined in paragraphs 1 and 3 of Part 1 of Schedule 12(A) of the Act, and the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

3. Silks 177 – 181 Rushey Green Catford SE6 4BD

The following is a summary of the item considered in the closed part of the meeting:

3. Silks 177 – 181 Rushey Green Catford London SE6 4BD

RESOLVED that having considered the evidence and submissions, the Committee's decision was to maintain the interim step taken on 13 March 2024.

The meeting ended at 12.47 p.m

Chair

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LONDON BOROUGH OF LEWISHAM

MINUTES of the meeting of the LICENSING COMMITTEE, which was open to the press and public held on 4 APRIL 2024 at 7 pm and held remotely via Microsoft Teams.

Present

Councillor Anifowose (Chair) Councillors, Atkinson, Brown, and Kestner.

Apologies for absence were received from Councillors Burgess, Howard, Jackson, Onikosi and Harding.

Also Present

Matt Lewin - Legal adviser
Angela Mullin-Murrell - Safer Communities Officer.

Silks 177 – 181 Rushey Green Catford London SE6 4BD

Applicant

James Rankin – On behalf of the Metropolitan Police
Sgt Giles Balestrini
P.C Pearce

Objector

David Dadds – Solicitor on behalf of the applicant

1. Minutes

RESOLVED that the minutes of the meeting of the Licensing Committee held on 26 March 2024 be considered at the next meeting.

2. Declarations of Interests

None.

3. Exclusion of the Press and Public

RESOLVED In accordance with regulation 4 (2) (b) of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 and under Section 100(A)(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 they involve the likely disclosure of exempt information as defined in

paragraphs 1 and 3 of Part 1 of Schedule 12(A) of the Act, and the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

4. Silks 177 – 181 Rushey Green Catford SE6 4BD

The following is a summary of the item considered in the closed part of the meeting:

4. Silks 177 – 181 Rushey Green Catford London SE6 4BD

RESOLVED that the conditions of the licence be modified in accordance with the annex to these minutes.

The meeting ended at 7.02p.m

Chair

ANNEX

The following conditions shall take effect at midnight on 3 May 2024.

1. The PLH shall replace the current SIA door team.
2. The Designated Premises Supervisor (or a person duly appointed by the DPS) shall be on duty at all times the premises is open for licensable activity.
3. The Premises Licence holder shall draw up and implement a premises specific drugs policy. The policy shall be reviewed as necessary but at least annually. A record shall be kept that a review of the policy has been made. Any changes must be agreed, in writing, by Lewisham Police Licensing Team and Lewisham Licensing Authority.
4. The premises shall produce and maintain an operations manual (the "Operations Manual") containing this Licence together with all the policies for the compliant operation of the premises. The Operations Manual shall include the security, search and entry, drugs, responsible alcohol service, welfare, and dispersal policies. All operational staff working at the premises, including management, shall receive documented training on the contents of the Operations Manual when they start employment and at least every six months thereafter. Any changes must be agreed, in writing, by Lewisham Police Licensing Team and Lewisham Licensing Authority.
5. All supervisory and managerial staff working at the premises shall sign for their receipt and understanding of the Licence conditions consistent with the operating schedule.
6. The Operations Manual shall be retained at the premises and shall be available for inspection by a Police Officer, Community Police Officer, or Authorised Officer of the Local Authority on request.
7. All persons entering or re-entering the premises shall be searched and scanned by a metal detector. This will be conducted in line with the current search policy, it must be conducted by an SIA trained member of staff and the search must be captured on the

premises CCTV or Body Worn Camera. These recordings will be kept in line with the current CCTV condition.

8. There shall be no admittance or re-admittance to the premises after 02:30 save for those exiting the premises to smoke or those persons that are booked promoters or DJs (Promoter and DJ details must be recorded, this will include their full name, company, and reason for entry).
9. The venue will have a written security policy. This will have a detailed risk assessment regarding how many SIA are required for each night. Any changes must be agreed, in writing, by Lewisham Police Licensing Team and Lewisham Licensing Authority.

Note - This is in addition to (and does not replace the current following condition on Silks 2 licence, page 7) A minimum of 2 SIA registered door staff, of which one (1) must be female and are all employed by an Accredited Contractor (ACS) registered company. They must be on duty Friday and Saturday nights from 21:00 hrs until 30 minutes after closing.

10. All customers, promoters and DJ's entering the premises after 21:00 on Club Nights shall have their personal details recorded by an electronic identification scanner. This scanner must record the identification produced and time of entry of any person. This information must be made available to police or Local Authority Officers immediately. In the event of the scanner not working there shall be no admittance to the venue.
11. The premises must operate in accordance with a written entry and search policy. A copy must be kept at the premises and made available for immediate inspection on request by Lewisham Police Licensing or an authorised officer of the Licensing Authority (as defined in Section 13, Licensing Act 2003). This policy must be kept under review and may be changed from time-to-time in line with best practice. However, copies of the policy and any revisions must be served on Lewisham Police Licensing and agreed by them in advance. Any changes must be agreed, in writing, by Lewisham Police Licensing Team and Lewisham Licensing Authority.
12. The front external smoking area will be limited to six (6) persons at any one time. This will be monitored by a minimum of one (1) marshal. They will ensure that no customers enter the venue from this area, and nothing is passed over the fencing from outside the premises. The area will be continuously monitored during the hours of operation by CCTV and/or the SIA/Marshal.
13. A written dispersal policy, with a focus on management by accredited street marshals, stewards, and door supervisors, shall be implemented, together with a zero-tolerance policy on anti-social behaviour and the use of prohibited drugs. Copies of these policies and details of all staff training in relation to them shall be provided upon request to the Police and authorised officers of the local authority (as defined by Section 13, Licensing Act 2003). Such training shall include the handling of vulnerable persons and conflict management. Any changes must be agreed, in writing, by Lewisham Police Licensing Team and Lewisham Licensing Authority.
14. The premises will provide additional stewards to patrol the immediate vicinity and encourage customers leaving the premises at closing time to leave the area quietly on Friday and Saturdays. During dispersal, a member of the senior management team will be present outside to oversee the dispersal of customers.
15. Polycarbonate/plastic/toughened glass drink ware is to be used by all persons, all alcoholic and 'soft' drinks are to be decanted by premises staff into such drinkware at the point of sale on except for Champagne, Sparkling wine and spirits sold by the bottle to VIP Tables.

16. All staff will undertake yearly welfare training. This training will be recorded in the venues training log. The venue will have a written welfare policy and will sign up to the woman's safety charter.
17. After 21:00 hrs the premises will ensure that full searches will be conducted of all persons entering or re-entering the premises. This will include all female customers, promoters, and DJ's.
18. All regulated entertainment will cease at the same time as alcohol sales allowing safe and effective dispersal.

Note – this replaces the 30-minute cool down period condition.

Agenda Item 2



Licensing Committee

Declarations of Interest

Date: 14 May 2024

Class: Part 1

Ward(s) affected: All

Contributors: Head of Governance and Committee Services

Outline and recommendations

Members are asked to declare any personal interest they have in any item on the agenda.

1. Summary

1.1. Members must declare any personal interest they have in any item on the agenda. There are three types of personal interest referred to in the Council's Member Code of Conduct:

- (1) Disclosable pecuniary interests
- (2) Other registerable interests
- (3) Non-registerable interests.

1.2. Further information on these is provided in the body of this report.

2. Recommendation

2.1. Members are asked to declare any personal interest they have in any item on the agenda.

3. Disclosable pecuniary interests

3.1 These are defined by regulation as:

- (a) Employment, trade, profession or vocation of a relevant person* for profit or gain
- (b) Sponsorship –payment or provision of any other financial benefit (other than by the Council) within the 12 months prior to giving notice for inclusion in the register in

respect of expenses incurred by you in carrying out duties as a member or towards your election expenses (including payment or financial benefit from a Trade Union).

- (c) Undischarged contracts between a relevant person* (or a firm in which they are a partner or a body corporate in which they are a director, or in the securities of which they have a beneficial interest) and the Council for goods, services or works.
- (d) Beneficial interests in land in the borough.
- (e) Licence to occupy land in the borough for one month or more.
- (f) Corporate tenancies – any tenancy, where to the member’s knowledge, the Council is landlord and the tenant is a firm in which the relevant person* is a partner, a body corporate in which they are a director, or in the securities of which they have a beneficial interest.
- (g) Beneficial interest in securities of a body where:
 - (a) that body to the member’s knowledge has a place of business or land in the borough; and
 - (b) either:
 - (i) the total nominal value of the securities exceeds £25,000 or 1/100 of the total issued share capital of that body; or
 - (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person* has a beneficial interest exceeds 1/100 of the total issued share capital of that class.

*A relevant person is the member, their spouse or civil partner, or a person with whom they live as spouse or civil partner.

4. Other registerable interests

4.1 The Lewisham Member Code of Conduct requires members also to register the following interests:

- (a) Membership or position of control or management in a body to which you were appointed or nominated by the Council
- (b) Any body exercising functions of a public nature or directed to charitable purposes, or whose principal purposes include the influence of public opinion or policy, including any political party
- (c) Any person from whom you have received a gift or hospitality with an estimated value of at least £25.

5. Non registerable interests

5.1. Occasions may arise when a matter under consideration would or would be likely to affect the wellbeing of a member, their family, friend or close associate more than it would affect the wellbeing of those in the local area generally, but which is not required to be registered in the Register of Members’ Interests (for example a matter concerning the closure of a school at which a Member’s child attends).

6. Declaration and impact of interest on members' participation

- 6.1. Where a member has any registerable interest in a matter and they are present at a meeting at which that matter is to be discussed, they must declare the nature of the interest at the earliest opportunity and in any event before the matter is considered. The declaration will be recorded in the minutes of the meeting. If the matter is a disclosable pecuniary interest the member must take not part in consideration of the matter and withdraw from the room before it is considered. They must not seek improperly to influence the decision in any way. **Failure to declare such an interest which has not already been entered in the Register of Members' Interests, or participation where such an interest exists, is liable to prosecution and on conviction carries a fine of up to £5000**
- 6.2. Where a member has a registerable interest which falls short of a disclosable pecuniary interest they must still declare the nature of the interest to the meeting at the earliest opportunity and in any event before the matter is considered, but they may stay in the room, participate in consideration of the matter and vote on it unless paragraph 6.3 below applies.
- 6.3. Where a member has a registerable interest which falls short of a disclosable pecuniary interest, the member must consider whether a reasonable member of the public in possession of the facts would think that their interest is so significant that it would be likely to impair the member's judgement of the public interest. If so, the member must withdraw and take no part in consideration of the matter nor seek to influence the outcome improperly.
- 6.4. If a non-registerable interest arises which affects the wellbeing of a member, their, family, friend or close associate more than it would affect those in the local area generally, then the provisions relating to the declarations of interest and withdrawal apply as if it were a registerable interest.
- 6.5. Decisions relating to declarations of interests are for the member's personal judgement, though in cases of doubt they may wish to seek the advice of the Monitoring Officer.

7. Sensitive information

- 7.1. There are special provisions relating to sensitive interests. These are interests the disclosure of which would be likely to expose the member to risk of violence or intimidation where the Monitoring Officer has agreed that such interest need not be registered. Members with such an interest are referred to the Code and advised to seek advice from the Monitoring Officer in advance.

8. Exempt categories

- 8.1. There are exemptions to these provisions allowing members to participate in decisions notwithstanding interests that would otherwise prevent them doing so. These include:-
- (a) Housing – holding a tenancy or lease with the Council unless the matter relates to your particular tenancy or lease; (subject to arrears exception)
 - (b) School meals, school transport and travelling expenses; if you are a parent or guardian of a child in full time education, or a school governor unless the matter relates particularly to the school your child attends or of which you are a governor
 - (c) Statutory sick pay; if you are in receipt
 - (d) Allowances, payment or indemnity for members

- (e) Ceremonial honours for members
- (f) Setting Council Tax or precept (subject to arrears exception).

Agenda Item 3



Licensing Committee

Report title: Merkur Slots 53 Sydenham Road SE26 5EY

Date: 14 May 2024

Key decision: No.

Class: Part 1.

Ward(s) affected: Sydenham

Contributors: Community Services – Safer Communities Service

Outline and recommendations

Determination of new premises licence application submitted by Merkur Slots UK Limited (previously Cashino).

After having regard to all the representations heard, Members must take such steps as they consider appropriate to promote the Licensing Objectives.

Timeline of engagement and decision-making

The Application was advertised in accordance with regulation 12 of the Gambling Act 2005 (Premises Licences and Provisional Statements) Regulations 2007.

The last day for representations was **15 February 2024**.

This matter must be heard as soon as is reasonably practicable after the expiry of any period for representations.

1. Summary

- 1.1. Merkur Slots UK Limited have applied for a new premises licence for the purposes of "Bingo".
- 1.2. The application was advertised in accordance with regulations (premises notice and the Newspaper advert).

- 1.3. Seventy Nine (79) representations were received from interested persons on the grounds of the following licensing objectives:
- to prevent gambling from being a source of crime & disorder
 - to protect children & other vulnerable persons from being harmed or exploited by gambling.
- 1.4. The representations received from interested parties have been examined by Officers and are considered not to be vexatious or frivolous. These representations were all received within the specified time.
- 1.5. The responsible authorities were notified of the application in accordance with regulations. A representation was received by the Licensing Authority, with no objection to the application.

2. Recommendations

- 2.1. After having regard to all documentary and other information in respect of this application, Members must take such steps as they consider appropriate to promote the three licensing objectives which are:
- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
 - ensuring that gambling is conducted in a fair and open way, and
 - protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 2.2. In considering an application for a premises licence the Act requires that a licensing authority shall aim to permit the use of premises for gambling in so far as the authority think the application is:
- in accordance with the 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
 - in accordance with the Council's Gambling Policy.
- 2.3. The Act states that in determining whether or not to grant a premises licence a licensing authority may not have regard to the expected demand for the facilities it is proposed to provide.
- 2.4. On considering an application for a premises licence (whether at a hearing or not) a licensing authority shall—
- (a) grant it, or
 - (b) reject it.
- 2.5. If the Licensing Committee grants the application it must:
- grant the premises licence subject to the mandatory conditions (pursuant to section 167 of the Act) **AND** the default conditions (pursuant to section 168 of the Act).

- 2.6. However, the Licensing Committee may:
- exclude a condition that would otherwise be attached as a default condition AND/OR
 - attach an individual condition.
- 2.7. All parties to the hearing has a right of appeal to the Magistrates Court against a decision which should be submitted to the court within 21 days of the date of the decision letter.

3. Policy Context

- 3.1. Decisions by Members of the Licensing Committee should have regard to the Gambling Act 2005 and the promotion of the three licensing objectives at all times.
- 3.2. Members should also have regard to the Licensing Authority's Statement of Gambling Policy 2019-22.
- 3.3. Decisions made will link in with the following objectives under the Council's Corporate Strategy – Building an Inclusive Local Economy and Building Safer Communities.

4. Financial implications

- 4.1. Applicants have the right of appeal against any decision by the Licensing Committee. Therefore there would likely be costs for the Authority in seeking legal support should an appeal be brought by the applicant.

5. Legal implications

- 5.1. The Licensing Authority is a public authority under the Human Rights Act 1998. Therefore the licensing authority is required to act compatibly with the convention rights in the exercise of their functions. Article 6 (1) of the Convention provides that everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial hearing established by law.
- 5.2. A Premises Licence is a possession for the purpose of the Human Rights Act 1998. The right to hold a licence is a qualified rather than an absolute right. Therefore the right to hold a licence may be interfered with if it affects the interests of local residents or others. Such interference may be justified if it is necessary and proportionate to promote the licensing objectives.

6. Equalities implications

- 6.1 The Equality Act 2010 (the Act) introduced a public sector equality duty (the equality duty or the duty). It covers the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 6.2 In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - advance equality of opportunity between people who share a protected characteristic and those who do not.
 - foster good relations between people who share a protected characteristic and those who do not.

- 6.3 It is not an absolute requirement to eliminate unlawful discrimination, harassment, victimisation, or other prohibited conduct, or to promote equality of opportunity or foster good relations between persons who share a protected characteristic and those who do not. It is a duty to have due regard to the need to achieve the goals listed above.
- 6.4 The weight to be attached to the duty will be dependent on the nature of the decision and the circumstances in which it is made. This is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. The Mayor must understand the impact or likely impact of the decision on those with protected characteristics who are potentially affected by the decision. The extent of the duty will necessarily vary from case to case and due regard is such regard as is appropriate in all the circumstances.
- 6.5 The Equality and Human Rights Commission has issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at:
<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-codes-practice>
<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>
- 6.6 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:
- [The essential guide to the public sector equality duty](#)
 - [Meeting the equality duty in policy and decision-making](#)
 - [Engagement and the equality duty: A guide for public authorities](#)
 - [Objectives and the equality duty. A guide for public authorities](#)
 - [Equality Information and the Equality Duty: A Guide for Public Authorities](#)
- 6.7 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and to whom they apply. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at:
<https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty-guidance#h1>

7. Climate change and environmental implications

- 7.1. Any decision made by Members must fall in line with the Gambling Act 2005, to that end there are no climate change or environmental considerations.

8. Crime and disorder implications

- 8.1. Under the Gambling Act 2005, one of the 3 licensing objectives is preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

8.2. It is the a requirement of the Gambling Act 2005 that any decision made by the Licensing Committee must not negatively impact on the Licensing objectives.

9. Background papers

9.1. Application received 18 January 2024

9.2. Premises plan

9.3. Local Area Risk Assessment

9.4. Operational Standards

9.5. Working Together

9.6. Representations as served x 79

9.7. Mandatory and Default conditions

10. Glossary

Term	Definition
Appeal	asking a court to overturn a lower court's decision. If the decision of a court is disputed it may be possible to ask a higher court to consider the case again by lodging an appeal.
Licence	an authority to do something.
Licensee	the holder of a licence to do something.
Licensing Authority	The Council (London Borough of Lewisham) Under section 2 of the 2005 Act, the licensing authority's area is the area for which the authority acts.
Licence Objectives	Under section 1 of the 2005 Act the Licensing Authority must promote the following three objectives <ul style="list-style-type: none">• preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,• ensuring that gambling is conducted in a fair and open way, and• protecting children and other vulnerable persons from being harmed or exploited by gambling.

Term	Definition
Interested Person	<p>A person who lives in the vicinity of the premises A body who represents the persons who live in that vicinity A person involved in a business in that vicinity A body representing businesses in that vicinity An elected member of the council</p>
Relevant Representation	<p>A representation that is specific to the premises in question, related to the four licensing objectives and/or the local licensing policy.</p>
Responsible Authorities	<p>Public bodies that must be notified of all applications and who are entitled to make representations in relation to Premises Licences, as follows:</p> <ul style="list-style-type: none"> • LBL Children’s Services • The Gambling Commission • HM Revenue and Customers • LBL Licensing Authority • LBL Planning Authority • Environmental Protection (noise) • London Fire Brigade

11. Report author and contact

11.1. Angela Mullin-Murrell – Safer Communities Officer – Licensing

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

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

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

Where the application is—

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

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

Part 1 – Type of premises licence applied for

Regional Casino

Large Casino

Small Casino

Bingo

Adult Gaming Centre

Family Entertainment Centre

Betting (Track)

Betting (Other)

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

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

Part 2 – Applicant Details

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

Section A

Individual applicant

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

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

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

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

Postcode:

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

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

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

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

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation:

Merkur Slots UK Ltd

7. The applicant's registered or principal address:

**Second Floor
Matrix House
North Fourth Street
Milton Keynes
MK9 1NJ**

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

003266-N-103444

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

N/A

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

Part 3 – Premises Details

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

Merkur Slots

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

**53 Sydenham Road
London
SE26 5EY**

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

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

N/A

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

No

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

N/A

Part 4 – Times of operation

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case?

No

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

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

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

N/A

Part 5 – Miscellaneous

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued):

N/A

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence?

No

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

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

Yes

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

**Merkur Slots
40 Deptford High Street, Deptford, SE8 4AF**

Bingo Premises Licence No: GPL113

**Merkur Slots
97-99 Lewisham High Street, London, SE13 6BA**

Bingo Premises Licence No: GPL106

**Merkur Slots
95 Rushey Green, Catford, SE6 4AF**

Bingo Premises Licence No: GPL114

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

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

The applicant has comprehensive measures to ensure that all gambling remains socially responsible, which includes detailed staff training on matters such as the protection of the vulnerable, including homeless individuals and young persons.

The applicant is an experienced licenced operator providing a large estate of gambling premises across the United Kingdom.

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

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

Merkur Slots UK Limited applies extensive policies and procedures to promote the Licensing Objectives.

Part 6 – Declarations and Checklist (Please tick)

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



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



Checklist:

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

Part 7 – Signatures

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

Signature:



Print Name: **Poppleston Allen**

Date: **18th January 2024**

Capacity: **Solicitors for & on behalf of the applicant**

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

Signature: _____

Print Name: _____

Date: _____

Capacity: _____

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

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

Part 8 – Contact Details

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

Felix Faulkner

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

24. Postal address for correspondence associated with this application:

**Poppleston Allen
The Stanley Building,
7 Pancras Square
Kings Cross
London
N1C 4AG**

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:

Objection 1 & 2 not included as addresses not provided

Objection 3

I am writing to register my strong objection to granting of the above licence.

I believe that the granting of the licence would lead to a source of crime and disorder in what is a residential local shopping area and so totally unsuitable for such a venue.

I am also concerned that children and other vulnerable people could be harmed and exploited by such a largely unstaffed operation.

Objection 4

I am writing to present my objection to the proposed Merkur Slots gambling slot machine venue opening up on Sydenham Road. I do not believe that this is a good use of that space, as gambling is an unhealthy habit and can cause people to become addicted to slot machines, and to get in to debt, which can even lead to suicide. It can also be a temptation for young people to go into these places, and become addicted to gambling, while also being places where they might be vulnerable to being groomed.

I would like to ask that this proposal does not go ahead.

Objection 5

I am writing as a local resident to lodge my objection to the planned licensing of the above premises for gambling.

Sydenham Road already has far too many gambling shops which in my opinion are a blight on the local neighbourhood.

As a retired Probation Officer, I have witnessed at first hand the misery and damage gambling inflicts on individuals, families and the wider community.

Gambling premises tend to attract some individuals who behave in an anti-social manner; I have witnessed littering and violent altercations on many occasions by people using the betting shops on Sydenham Road and elsewhere. Yet another similar establishment will increase this type of anti-social behaviour to the detriment of our local community.

Gambling has become a serious problem in our society and granting ever more licences to the gambling industry exacerbates the problem it is responsible for. I do not believe that any local authority, elected to represent their constituents should be providing support to such a destructive industry.

Objection 6

I am a resident of Girton Road, Sydenham and have lived in SE London for most of my life. I am really concerned by the licensing application for a new gambling premises at 53 Sydenham Road by the company Merkur Slots.

There are already three betting shops on that stretch of the high street and a bingo hall behind the station. These premises are the primary source of public nuisance on the high street, where there is a growing problem with begging and anti-social behaviour.

The only winners from more high street gambling outlets are the owning companies and those receiving the rent. People that use these gambling shops are often those who don't have money to lose.

The presence of so many gambling shops in a High St is a sign of a struggling high street and that is an issue for the local MP.

It should be much harder to gamble than it is now. Gambling advertising on TV and phones is particularly pernicious and I wish the laws on this had never been liberalised. Gambling is a really harmful addiction that, unlike drug and alcohol addiction, can go unseen until addicts have lost everything. **Opening another gambling outlet is a big mistake.**

I don't appear to have any grounds to object according to the Council's licensing guidelines so I am asking if there's anything you can do to support local residents in improving our high street, rather than inviting more public nuisance and anti-social behaviour.

Thanks

Objection 7

> I am writing as I am most strongly opposed to the opening of Merkur Slots in Sydenham Road.

> As someone who has lived in Sydenham since birth I am very concerned about problems that will develop. I feel sure that crime and disorder will be caused by the opening of such an establishment and that children and vulnerable adults will be badly affected and sucked into the world of gambling with dire consequences.

>

I apologise for misspelling the name of the company which is Merkur Slots

Objection 7A

I would like to register my objection to the proposal to open a bingo gambling unit in the disused Santander site in Sydenham Road.

> As the unit will be largely unstaffed protection for children and vulnerable adults will be minimal leaving avenues open for coercion, unregulated gambling, theft and even violence. There is frequently a correlation between gambling and alcohol and the fact that this is proposed as a 24 hour venue will make it more accessible to persons who already have a gambling problem. Sydenham is a very residential area, and this proposal will have a negative impact on the lives of residents. It is very likely that it

will be a cause of noise and disturbances at unsociable hours. We do not need or want this facility in the heart of our community. I urge you to reject this proposal.

Objection 8

My objections are as follows:

1. This site is in the centre of a shopping high street ie retail business, thereby depriving possible retailers looking for premises. It is currently designated for retail and food outlets.
2. Gambling slot machine business will attract mainly males who will tend to hang around a slot machine business blocking the street and creating a threatening atmosphere where families are shopping daily
3. A gambling licence will attract males who can hang around all day and night if a 24 licence is permitted which would be very detrimental to local residents. A 12 hour licence would be equally detrimental.
4. A gambling outlet is against the ethos of Sydenham High Street which currently provides a diverse range of retail, gyms, food outlets all of which are for the good of the public as a whole.
5. Gambling encourages people to spend their money which they can ill afford and is a mindless occupation.

Objection 9

I wish to object in the strongest possible terms to the application for a largely unmanned slot machine / gambling shop at this premises.

Our community is working hard to support one another and develop our local area as one that is nurturing to all. Merkur Slots' proposal will provide opportunity for unmanned and therefore largely in practice unregulated gambling on the high street. This is not healthy for our children and young people, and it is also not healthy for the most financially vulnerable. Sydenham already has the Bingo hall, so there is provision for safe and fun gambling on Kirkdale, and we also have 2 other betting shops on the High St.

I do not think Merkur's business model will ensure that gambling is done in a safe way; and I would like the license application to be turned down to protect children and young people from being harmed and exploited by gambling on our high st. Shops like this normalise gambling. And we know from evidence that slot machines are some of the most addictive types of gambling there are: a (2021) [recent meta study](#) shows: "the most frequently assessed problem gambling risk factors with the highest effect sizes are associated with **continuous-play format gambling products.**"

Gambling is harmful - we know that. This [recent report from the LGA \(2023\)](#) suggests that "**Consequently, councils should seek to prevent exposure at a population level to harmful gambling products and practices.**" Gambling also harms the most vulnerable the most: "*However, some individuals may find certain circumstances, such as mental ill health or economic circumstances, are worsened*

by gambling, and this can widen inequalities as harmful products and practices are being targeted at those least able to withstand the harms."

Lewisham should also note that the LGA report argues that there are knock-on effects of harmful gambling, which impacts other council services "*Gambling may also be driving demand for other council service areas, including children's, family and adult social services, treatment and early intervention services, homelessness and wider housing services and financial inclusion and debt advice services.*"

The shop is not a shop that will employ many local people, and will not be a positive addition to the local community - whereas so many other of our local shops are helping the community to come together and support one another in really productive ways.

Please accept my strongest objections

Objection 10

As a business owner of **XXXXXXXXXXXX** I strongly object to the above premises being allowed to trade as a slot machine business. This will kill our high street, we are already suffering enough with mental health and addicts without more bad attraction to the area. Shop thief is a daily occurrence on this high street without inviting more.

This really is not a good idea we need retail shops attracting more customers not turning them away.

I await your final outcome.

Objection 11

I have become aware the above address has applied for a slot machine premises. This is absurd, the crime rate will go up on the high street and make it even more unsafe than what it is. The high street does not need this kind of business. I live in the area and work on the high street and see the amount of addicts go and steal and know if this is allowed it will attract more thief on the high street. Please do not allow this to happen and kill our high street.

Objection 12

Hello I wish to express my concern for another gambling place in Sydenham. There's already plenty of them. It will attract more crime which we already have plenty of street robberies etc. Also vulnerable people could access it without carer or family knowledge. Also we want the high street to be family friendly. Please do not allow the license.

I forgot to mention Apple Bingo at Kirkdale. It's less than a few hundred yards from the proposed new one. There are many many slot machines there already if people want to play.

Objection 13

I would like to strongly object to the licensing application by 'Merkur' at 53 Sydenham Road for a 'slot machine' installation at this address.

This would offer no benefit to the high street in fact it would have a detrimental affect to an area that already has a problem with social issues.

The location also is right next to Newlands Park bus stop where many school children use this stop and the high street in general suffers from drug use and begging.

It would be totally inappropriate to allow this application and I strongly object.

Objection 13A

I would like to object to a license being granted for Merkur Slots at 53 Sydenham Road. This would cause both additional crimes and attract children and young adults to gambling. Sydenham already has problems with drugs and thefts and this would be detrimental to the area.

Please do not allow this.

Kind regards

Objection 14

I am writing to express my concerns about and opposition to the application by Merkur Slots for a gambling licence to operate at 53 Sydenham Road.

I am concerned that the presence of a slot machine business, particularly one that is largely unsupervised, will lead to increased crime and disorder in Sydenham. This would be exacerbated if allowed to operate 24 hours a day. I also object to it on the grounds that children and vulnerable adults could suffer harm or exploitation from gambling at the site.

I am copying this to the Councillors representing Sydenham on Lewisham Council with a request that they also oppose the licence application.

Objector 15

I am writing to express my strong objection to the granting of a gambling licence to Merkur Slots for the establishment of a shop in Sydenham High Street. As a concerned resident of the area, I believe that allowing such an establishment would have detrimental effects on our community.

First and foremost, the presence of a gambling shop in our neighbourhood could lead to an increase in gambling addiction and related social issues. Studies have shown that easy access to gambling facilities can exacerbate problem gambling behaviours, leading to financial hardship, family breakdowns, and mental health problems.

Furthermore, the opening of a gambling shop goes against the efforts to promote responsible and healthy lifestyles in our community. Sydenham High Street should be a place where families feel safe and welcome, not a location that facilitates addictive behaviours and preys on vulnerable individuals.

I urge the council to carefully consider the long-term consequences of granting a gambling licence to Merkur Slots. Instead of promoting activities that can harm our residents, we should focus on supporting businesses that contribute positively to the well-being of our community.

Thank you for considering my objections to this matter.

Objector 16

I strongly object to this gambling slot business being licensed in Sydenham Road. Gambling can be an addiction and it is important that we protect children and other vulnerable persons from being harmed or exploited by gambling. The location of the business would be just a few feet along from the main bus stop taking school children home in the direction of Lower Sydenham. The location has extremely busy footfall being located next to Boots and pedestrian lights in one direction and the route to Sydenham train station in the other. Under no circumstances, either 24 hour or shorter, should a license be issued.

Objector 17

As a resident of Sydenham, I am writing to object to the application submitted by Merkur Slots to open a venue at 53 Sydenham Road.

I object on the grounds of protecting children and vulnerable people from being harmed by or exposed to gambling and also on the grounds of preventing gambling from being a source of crime and disorder.

Objector 18

As a local Sydenham resident, voter and mother of a young child, I strongly oppose the proposed use of 53 Sydenham Road as a gambling venue.

Having lived opposite Paddy Power on Dartmouth Road in Forest Hill for two years, I have first hand experience of the awfulness of such places.

Sydenham is finally prospering and such venues will bring nothing good to the area and its residents.

Action must be taken to ensure we don't allow gambling venues such as this to open, acting as a source of crime and disorder. We already have more than enough. We also have a duty of care to protect children and vulnerable persons within our community from being harmed or exploited by gambling.

Objector 19

I'm writing to voice an objection to the application from Merkur Slots for a Bingo Premises Licence at 53 Sydenham Road.

It's my understanding that the proposal is for a largely unstaffed operation with press-button entry on the door. And that while this application may not be for a 24 hour premises, many existing Merkur Slot premises are 'open' 24 hours per day – such as in Bromley

Opening this type of business would be damaging and degrading for the community and risk increasing crime and disorder in the Sydenham area. You only have to do a quick search online to discover how many crimes are already associated with this same chain of gambling businesses in other areas across the UK.

This is especially more worrying since these establishments are known to be minimally staffed. This could not only lead to vulnerable people being put at risk and harmed by gambling, but it could mean that this premises becomes a hub for dangerous people.

While the licensing application may not be for a 24 hour premises right now, there is also the threat of this being changed in the future.

As a resident of Sydenham, the possibility of increasing chances of harmful behaviour makes me really worried for my own safety as well as that of other women and vulnerable people who walk down the high street every day, going to and from the station.

Objector 20

As local residents we have heard from social media that the old Santander bank site on Sydenham road is to become a 24 hour slot machine arcade.

We mainly wish to object on the grounds that young adults and vulnerable people will be attracted to this type of 24 hour establishment and in turn have a negative impact on their lives and on this part of south London. Furthermore the gambling addicts and petty criminals who will be rubbing shoulders with young people is a warning sign.

The betting shop addicts will also be using the arcade - there are many betting shops in Sydenham - is this why Merkur have designs on our high street?

Our many decades of experience working in education have seen how these kind of places are magnets to the young and impressionable and ,as school children from several secondary schools in the area flood the highstreet in the afternoons post school and lunch times ,to the chicken shops and Subway etc this would be another place for them to 'hang out'. In turn where the young gather, often then county lines groomers and drug dealers also target , thus developing a myriad of further issues in its wake.

On a simpler level we would not even be comfortable walking past this shop in the evening coming back from Sydenham station. It is a complete anomaly to our environment and to the high street.

Further evidence may be exemplified in this article in a national newspaper where drug dealers launder their money through slot machines.

<https://amp.theguardian.com/uk-news/2013/nov/08/gambling-machines-drug-money-laundering-bookies>

We have lived here for over 20 years and we have some amazing original retailers and we need more of the vibrant variety of premises on the high street to balance out the overload of nail bars which seem to come in all the time. But a slot machine arcade is not one that is welcome to us and all the neighbours we have spoken to.

We believe it would be very short-sighted to allow a licence for this business ,not least for the reasons cited above and the resulting impact on council funds to sort out the crime it would inevitably attract by its very nature.

We would like some reassurance that Lewisham licensing are going to make us as residents continue to feel safe and that there is a wider acceptance of the impact such an establishment would have on the young and the vulnerable.

Objector 21

I am a resident of **XXXXX** and my young family and I enjoy Sydenham High Street and the shops and cafes that it has to offer. We are glad to see many new businesses opening that contribute greatly to the community like Leo's, Blackbird Bakery and Blossom & Threads. And also appreciate the longstanding shops that help the area retain its character. But we can't help but notice the 20m stretch of road that hosts three bookmakers. Given the issues the UK faces with gambling addiction I would personally be happy not to see any on our high streets, but to have three is certainly overkill and adds nothing to the area. I now understand the council is considering giving a license to a 24-hour slot machine shop in the same small

area. Gambling is a significant and pernicious problem for households across London and the UK. That we should dedicate so much of our public spaces to the promotion of these companies completely fails vulnerable people in our society that we should be protecting. Slot machines are a particular issue with their addictive gamification of gambling (at particularly bad odds) and bright lights that are particularly attractive to young children. The shop would not enhance our area, nor would it contribute meaningfully to local employment but would add another late night area for anti social behaviour and the exploitation of vulnerable members of our society and children. Our area is developing and we are building a really nice community of young families, I truly believe it would be a backwards step to give a license to Mekur Slots and turn our high street into a gambling strip.

Objector 22.

I am writing to object to the proposed slot machine business at 53 Sydenham Road. It is a business which will not add to the fabric of Sydenham road and its community but take away from it.

It is not a business which adds to the commmunity like a cafe, shop or even a bar would.

We already have multiple gambling shops in Sydenham road (which I also think detracts from the community). A slot machine is not what the community needs.

The council should be taking a hood hard look at what the people of the community want and need from their high street (more smaller independent shops) instead of grating licenses for places that will strip the road of a sense of community.

Objector 23

I am writing to object to the application to open a gambling premises at 53 Sydenham Road. There are already an excessive number of betting shops on this road and a bingo/gambling/slot machine shop would be detrimental to local residents.

This is a family area. I live around the corner with my 11-year-old and 14-year-old children. I am concerned that having this kind of shop in close proximity could be tempting to them on the way home from school, introducing them to gambling.

I am very alarmed to hear that it could even be open 24 hours, and worried by the idea of people who are out of pocket wandering around these streets at night, potentially with gambling addictions which may lead them to criminal activities and violence in what is a family area, to fuel their addiction.

I am also concerned to hear it could be unstaffed some of the time. Surely this is extremely unethical and irresponsible.

Please do not grant this license.

Objector 24

I have seen that German company Merkur Slots are proposing to use the premises at 53 Sydenham Road for a slot machine / gambling store.

I feel that this would not be a good addition to building a safe, sustainable and productive high street.

There is evidence that such premises, often open late at night or in some cases for 24 hours, become sites for criminal activity and can contribute to issues of crime and disorder.

There is also evidence of how gambling is affecting many young people and having a store open in the high street is bound to encourage young people to gamble. See the Gambling Commissions report;

<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/young-people-and-gambling-2023>

“Over half of young people had seen or heard gambling advertising via online or offline platforms (Online: 53 percent; Offline: 55 percent). This represents a significant decline in exposure to gambling advertisements since last year (2022 findings: Online: 63 percent; Offline: 66 percent). Young people were most likely to report seeing gambling advertising on television (47 percent) or on an app (45 percent).

Most (80 percent) young people who spent their own money gambling in the last 12 months, did so because they regard it as a fun thing to do. Less than one in five (17 percent) agree that gambling makes them feel happy, more (29 percent) disagreed that it made them happy, and a similar proportion (28 percent) were unsure either way.”

I very much hope that Lewisham will not approve the license request.

Objector 25

> >

> I am aware that LB Lewisham are considering granting a licence for Merkur Slots to take up a shop space on Sydenham Road. This is an atrocious idea and will lead to increased anti-social behaviour in the area. As a responsible borough, you should be finding ways to prevent gambling from being a source of Crime and Disorder, which this will be, and ensuring that gambling is conducted in a fair and open way, so as to protect children and other vulnerable people from being harmed and exploited by gambling and criminal gangs.

>

> I object to this, and urge you to not grant the licence.

> >

Objector 26

House of carpets and curtains
57 Sydenham Road Sydenham SE26 5E

I am sending this email regarding the plans to open Merkur slots at 23 Sydenham Road SE26. I strongly object to this business opening. I am a local resident of Sydenham and working 2 doors away from its location. What with it being unmannd it will create problems and entice criminality to the area example alcohol, drugs, and burglary. It will affect the customer flow into the shop I work in and will cause the small business to close which has been in Sydenham for over 35 years.

Objector 27

I am a local resident (XXXXXX) and I object to the proposed 24 hour gambling shop/slot machine site proposed for 53 Sydenham Road. I think this will be harmful to society and that Lewisham Council should seek to protect its residents/local population from gambling. I have a young family and am not comfortable with this sort of establishment and the potential problems/harm it may cause.

Objector 28

I am writing to lodge my objection to this site being turned into 24 hour slot machine premises.

During these times of austerity this site could become addictive to vulnerable persons and children leading them to be harmed or exploited by gambling.

As a 24 hour site this could become a source of crime and disorder, Sydenham High Street is delicate balance of residents and businesses, having this type of business operating will change the fabric of the local area.

There is already a gambling establishment on Sydenham High Street we do no need any more.

Objector 29

I would like to object to this application. I am a local resident in SE26 with 3 teenage children and we all frequent Sydenham High Street on a regular basis.

The grounds of my objection are as follows

1. The operation of such a store would encourage crime and disorder on the high street. I understand it will be open 24 hours a day and will be largely unstaffed
2. The operation of such a store would not protect children and other vulnerable people from being harmed or exploited by gambling. In fact it would do the opposite. The high street is a busy route for school children travelling to and from school. Such a store will simply draw these children in.

3. I also note that as a council you have an obligation to seek to prevent exposure to harmful gambling products and practices:



The opening of this store would be wholly at odds with this obligation.

Objector 30

We object to this application.

Merkur Slots has applied under the Gambling Act 2005 for a Bingo Premises Licence at **53 Sydenham Road** (the shop previously run by Santander).

The site will be owned by German company Merkur and operated by Eyas Gaming Limited, a company based in Malta.

The proposal is for a largely unstaffed operation with press-button entry on the door. Many Merkur Slot premises are 'open' 24 hours per day. If there are objections by the licensing committee to granting a 24 hour licence, Merkur may run the business for a number of months and then re-apply, challenging the committee to produce evidence of 'harm'.

The Sydenham Society has received a number of objections from local Sydenham Road retailers and Sydenham residents and intends to object strongly to this application.

We think it is bad news for the area and our objections are as follows

- * To prevent gambling from being a source of Crime & Disorder
- * To ensure that gambling is conducted in a fair and open way
- * To protect children & other vulnerable persons from being harmed or exploited by gambling

Objector 31

I am writing to object to the application for a Bingo Premises Licence for the above premises. I am a local resident living at Westbourne Road and I am worried that if the licence is granted the premises may become a source of crime and disorder. This is all the more likely as I understand the premises will be largely unstaffed. I am also concerned that children and other vulnerable people may be harmed or exploited by gambling.

Objector 32 address not provided

Objector 33

I would like in the strongest terms to register my objection to Merkur Slots application to open a slot machine business at 53 Sydenham Road.

This is a decent high street, with businesses seeking to up the quality of what is on offer to the people of Sydenham. The Council are doing their best to raise standards in the street with expensive planting and pedestrianising projects.

The very last thing that is wanted is a business that would frustrate these endeavours. A slot machine business would attract crime in its environs. The people who would seek to play the machines should be helped in their dangerous path to gambling addiction by NOT having such a premises.

Nor should children and vulnerable people be exposed to low-level gambling.

At present Sydenham Road does not have alcoholics and beggars as in other parts of Lewisham Borough. I could see that changing rapidly if Lewisham Council passes this application.

Please do your bit for us, and speak out in Council AGAINST this application.

Objector 34

I am writing to formally lodge a complaint / objection to the proposal of a slot machine business opening up on Sydenham High Street. I have a number of reasons...

1. The implementation of such an institution in the area - particularly an unmanned one - opens up the risk of crime and disorder in relation to gambling in our community.
2. There are many children and young people in the area who would be negatively impacted and/or influenced by the presence of such a "business".
3. In keeping with the development of the area, promoting gambling is a huge step backwards. Using the retail space for a more productive and healthy business that

actually provides needed goods or services to local residents would be a better use of the space, especially one that could provide local jobs.

Please keep me updated on any further developments.

Objector 35

I am a resident of Bishopsthorpe Road, approximately half a mile from the intended location. Number 53 Sydenham Road is sited within the Thorpes Conservation Area, designated in 2000 and extended to include various parts of Sydenham Road in 2007.

I understand that there are very narrow grounds on which an application of this type can be refused. However I would point out that Ground 3 - **protecting children and other vulnerable persons from being harmed or exploited by gambling** - is particularly relevant in this case.

The core shopping area of Sydenham Road is situated within a compact network of residential streets full of family housing. Girton, Tannsfeld, Newlands Park and Homecroft Roads are all situated immediately to the south; Mayow, Earlsthorpe, Dukesthorpe, Princethorpe, Kingsthorpe, Queensthorpe, Bishopsthorpe and Silverdale are to the north. These roads are tightly packed with family homes of all types and tenures, with a large number of children and young people in the area.

Other Merkur Slots locations tend to be in major town centres away from residential streets, eg the branches in both Lewisham and Bromley High Streets. The provision of an adult gambling centre in Sydenham Road will expose young people to the possibility of harm and exploitation from gambling as set out in Ground 3. The premises are within a few feet of a bus stop used by school students travelling to and from local secondary schools, namely Sydenham School, Sydenham High and Forest Hill Boys.

I therefore respectfully request that this application is refused; the example copied below from Enfield provides a precedent for refusal.

Enfield Council precedent

Enfield Council recently refused an application for a similar operation, this time to go into a former betting shop not a bank (Santander) as is the case in Sydenham.

Of note are the comments in point 4 – I consider the case for rejection of this application is stronger given the former Santander premises were not used for gambling and the application might bring problems that previously did not exist.

"Last year under public pressure the Licensing Sub-committee was due to reconsider its decision, but the threat of legal action led it to back down. However, several months later it rejected Future Leisure Ltd's application for a games arcade in another part of Enfield. Its decision states:

'1 The licensing sub-committee [LSC] was not persuaded that the risk assessment undertaken by the applicant was sufficient to protect children, young people & vulnerable persons from being harmed or exploited by

gambling, especially as the premises are close to many local schools & the train station meaning that many people would pass it regularly.

2 Following all representations by the interested parties, especially IP1 & IP2, the LSC were persuaded that these premises will add to/ increase the existing problems of crime & anti-social disorder within this ward.

3 The LSC were also very anxious that the pavement outside the premises is very narrow making it difficult if not impossible to patrol, as the applicant has suggested they will.

4 The LSC acknowledges that prior to this application there was a betting shop on the premises, which operated without problems. **However the LSC believe that these premises as an adult gaming centre with longer hours would bring problems that did not previously exist."**

Objector 36

>

>

> I am writing to you to communicate my strong objection to Merkur Slots' application for a Bingo Premises Licence at 53 Sydenham Road.

>

> The arrival of this business would be seriously detrimental to our high street, and will put children and other vulnerable persons at risk of being harmed or exploited by gambling. I am also concerned that slot machines in our neighbourhood would lead to gambling being a source of crime and disorder in the area.

>

> I strongly urge you to reject this application for the good of the community.

>

Objector 37

Merkur Slots has applied under the Gambling Act 2005 for a Bingo Premises Licence at 53 Sydenham Road (the shop previously run by Santander)

I wish to object.

There are already betting shops on Sydenham Road and slot machines in pubs so those who wish to gamble can already. The more gambling opportunities there are, the more likely it is that those who struggle to control their gambling will not be able to (more temptation and somewhere new to gamble if they are barred elsewhere or have voluntarily banned themselves). Also, if this outlet is operated 24 hours with minimal staff as other sites operated by this company are, there is even less supervision and even more likelihood of vulnerable adults (addicts or people prone to addiction) and underage children gambling. Even if it isn't open 24 hours they are still at risk by the mere presence of gambling premises: these operations are designed to

be attractive and lure people in (Bingo in particular is positioned as 'harmless fun') but we know that staff (just as in off licenses) will not always be scrupulous in checking customers ages. Many people in Sydenham, which is a poor area despite a few nice streets, are particularly vulnerable to being lured into gambling because of poverty, which only exacerbates their poverty and in many cases debt. Gambling is a predatory industry with a cavalier approach to safe-guarding. I therefore object on the grounds of the need to protect children & other vulnerable persons from being harmed or exploited by gambling

Gambling is inherently a source of crime and disorder - not necessarily at the gambling premises itself but because it creates debt and fuels poor mental health linked to violent crime and domestic abuse. People in debt are more likely to commit crime due to lack of money or to suffer violence at the hands of their creditors. If there is any late night opening, whether or not 24 hours, then there is a good chance customers will also have been drinking, increasing the risk of violence and other crime at the actual premises and also in Sydenham Road. A report by the Howard League (<https://howardleague.org/wp-content/uploads/2023/02/Holding-it-all-together-and-picking-up-the-pieces-Womens-experiences-of-gambling-and-crime.pdf>) has shown that aside from links to financial crimes, there is growing evidence that gambling can be linked to other types of offending including domestic abuse. I therefore also object on the grounds of prevent gambling from being a source of Crime & Disorder.

Objector 38

I am urging the rejection an application for a Bingo Premises Licence submitted by Merkur Slots UK Ltd for the premises at 53 Sydenham Road, SE26 5EY. I propose we follow the precedent set by Enfield Council, where a similar application was rejected due to concerns about crime, anti-social behaviour, and potential harm to children.

I support the reasons outlined by the Sydenham Society but would like to highlight:

1. The venue is situated in an area regularly visited by families and vulnerable adults, potentially exposing children to gambling activities with the neon lights and their intentionally enticing shop front. Merkur Slots locations typically operate in major town centre sites away from residential streets. This local and more residential high street location is unsuitable for an adult gambling centre that could harm young people. The premises are close to a bus stop used by school children traveling to and from local secondary schools, increasing the risk of children's exposure to gambling.
2. The potential broader impact on the community, including the exacerbation of financial struggles during the current cost of living crisis.
3. The possibility for the establishment to become a hub for crime and disorder. The transformation of a bank into an adult 24 hour gaming centre could introduce anti-social behaviour to the area.

Councillor Jack Lavery

Labour and Co-operative Party Councillor for Sydenham

Objector 39

I object to the proposed open slot machine business at 53 Sydenham Road.

I object for the following reasons:

Given that there is a busy bus stop close by it will encourage anti-social behaviour and encourage young and vulnerable people to gamble.

An open slot machine business is not compatible with the type of business that exist and should be encouraged in the High Street. Only recently a number of betting shops closed in the High Street and the proposal would reverse the trend of discouraging gambling premises on the High Street.

A 24hour business would encourage crime on the high street especially at night putting local people and customers at risk.

Please refuse the application.

Objector 41

Could i please register my objection to the above application which I understand is for a 24 hour slot / gambling premises on the former site of - ironically - Santander bank.

Speaking as someone who has previously lost everything to a gambling addiction, I strongly object to this sort of premises going up in the local high street. This will be a magnet of crime, despair and misery. I've dealt with my issues but this will cause untold problems for others. In addition to blighting the streetscene. Of all the businesses that could trade from here, a 24hr slot machine palace, really ? You can do better guys

Please refuse this proposal

Objector 42

Please let me know if there is anything else we can do to prevent this disastrous proposal.

>

I have just heard of the scary proposal for a slot machine business to occupy 53 Sydenham Road . This is a dreadful idea and frankly the last thing Sydenham needs.

> Gambling attracts crime and disorder and We(society) need to protect children and other vulnerable persons from being harmed or exploited by gambling.

> Local people will have strong feelings against this proposal.

> Please tell me going forward how else our voices may be heard ?

Please let me know if there is anything else we can do to prevent this disastrous proposal.

Objector 43

I wish to object to the application to open a slot machine business at 53 Sydenham Road. I believe that such a business might harm or exploit children and other vulnerable people. Forest Hill School, a boys' secondary school, is just a 15-minute walk from the premises. I fear that a gambling venue would attract some of its pupils.

Objector 44

I am writing to object to the proposed gambling licence on Sydenham high street by Merkur Slots.

I believe that this proposed business would bring crime into our neighborhood and encourage disorderly behaviour late into the night by people who may have been drinking. This will create an extremely unpleasant atmosphere for our neighbourhood both day and night.

It will contribute to making both our high street and community an unsafe place for children for two reasons:

- 1- sending out a powerful and dangerous message to children and other vulnerable people that gambling is easily accessible who may be exploited, and
- 2- by attracting disorderly behaved individuals who will be a dangerous influence on children and the rest of our community.

Thank you for taking my objections onboard.

Objector 45

I'd like to object to the application by Merkur Slots for a Bingo Premises Licence at 53 Sydenham Road.

I have been a Sydenham resident for 4 years now and I have seen an improvement in the amenities offered to us locals during this time. Another gambling venue certainly isn't appealing and doesn't do any good to the many young families living in Sydenham.

Also, Sydenham Road at night is not the safest place and I am worried that a 24/7 gambling venue may become a focal point of people in a heightened state of mind. Adding to that, the presence of licenced shops selling alcohol practically all night in the area would exacerbate the problem of street drinking on Sydenham Road and adjacent streets, as well as possible loitering and unsociable behaviour.

My family is unfortunately well acquainted with these behaviours due to living across a betting shop for a few years... and that's not even a 24/7 operation.

Furthermore, I witness drug exchanges on a regular basis and I fear that a business like Merkur Slots would encourage illicit drug dealing and consumption, due to its addictive nature and the highs and lows driven by gambling outcomes.

While the standard of what a good high street looks like are not objective, but I feel strongly that a gambling establishment has nothing valuable to offer to our community, nor can serve as a healthy example for younger and more impressionable minds.

Objector 47

To prevent gambling from being a source of crime and disorder

53 Sydenham Road is very close to a busy bus stop which is outside my shop, the House of Carpets and Curtains at 57 Sydenham Road. The pavement is narrow and often crowded with waiting passengers. I am very concerned that there is a safety risk because of the larger footfall outside and potential for overcrowding and spillage onto the road. The pavement here is in constant use and is an already busy route to Sydenham railway station. It is already quite noisy and we do not want any more noise from the shop trading 24 hours a day.

Sydenham high street is a problem area with street begging, street drinkers, homeless people who regularly meet in Queensthorpe Square which is next to 59 Sydenham Road and I do not want any more anti-social behaviour in the area from gamblers hanging around outside 53 Sydenham Road 24 hours a day.

The Sydenham Neighbourhood Policing team regularly patrol the high street but are short of resources and work on a shift pattern. When the team are not on duty there is limited support for anti-social behaviour, violence and public disorder.

To protect children and other vulnerable persons being harmed or exploited by gambling

The high street is used every day by many school children from the local schools. I have concerns that children and other vulnerable residents should not be harmed or exploited by gambling in public commercial premises by having this activity on the high street. I am concerned that students under 18, vulnerable people and those with mental health and/or addiction problems could be encouraged to use the premises to gamble by the fact that the slot machines will be on the high street.

This type of venue is totally unsuitable in this location in a busy high street with people families and vulnerable people living in flats above the shops. The high street is mainly retail meeting the needs of residents and there are no other shops along this parade that open 24 hours a day. The three bookmakers further down the road close at reasonable times and there is a bingo hall at Cobbs Corner.

The Sydenham Centre is opposite at 44 Sydenham Road with Ignition Brewery on the ground floor that provides employment and training for people with learning disabilities. Upstairs are the offices of Sydenham Arts and Montage Theatre Arts who use the hall and stage for theatre productions. Sydenham Arts provide classes for vulnerable residents as well as a programme of Warm Welcomes which benefit

residents in difficult financial circumstances whether because of high energy bills, unemployment, low incomes, or debt, and people with mental health problems. It is in the interests of all these vulnerable people and children that the town centre is a safe, sustainable public place.

I think a 24 hour Adult Gaming Centre will damage the economic and commercial life of the high street. I know customers who struggle on low incomes and in difficult economic circumstances vulnerable people are prone to gamble to try to ease their financial difficulties. Please do not allow this centre to open.

Also over the last few years being a shop owner and talking to other businesses in Sydenham road, we have all noticed the decrease in people using the high street, and I just feel a business like this would harm the area even more, maybe forcing businesses' to close or relocating making the high even worse.

Objector 48

> I would like to submit my objection to the siting of a 24 hour generally unmanned slot machine shop at 53 Sydenham High street. Reasons for my objection are as follows:

>

> - 24 hour opening, and at times unmanned, would encourage misuse of the premises (drug use etc) and as a consequence, attraction to the area of associated, unwelcome activities (crime and disorder).

>

> - Gambling on slot machines can introduce persons to other types of addictive gambling and lead to all the harms associated with gambling (see below).

>

> - Gambling in any form can be addictive and can harm a persons individual mental health. Finances, etc. This can lead to other problems in life (relationships, housing, work). It also affects other people connected to the gambler (colleagues, family, etc). This can lead to pressure on other services in the area (NHS. Social Services).

>

> - The high street fights hard to maintain a friendly demeanour and its use as a thriving high street with cafes, grocers, butchers, etc. We already have betting shops on the high street. An additional 24 hour slot machine shop in a prominent busy part of the street does not: help to promote the high street; encourage people to use the high street; or to attract other trading shops to the area. A lot of the local population, including young families, would be deterred from using the high street and lead them to shop elsewhere. That in turn, would lead people to travelling to other high streets/amenities which encourages more traffic etc. We need to promote the local high street and make it attractive to use.

>

> - The high street has a lot of foot traffic from local secondary school students. There is also a number of 'care in the community' residences in the area who house vulnerable people who use the high street. Easy access for these young and vulnerable people to gambling is not a good idea due to all the problems associated with gambling. There is a need to protect such people from being harmed or exploited by such gambling.

>

> - The Local Government Association (LGA) Report published in October 2023 indicates that councils should seek to prevent exposure at a population level to harmful gambling products and practices. The siting of an unmanned, 24 hour open, unmanned slot machine shop would be harmful for all the reasons detailed above.
>

Objector 49

I am writing to you to express my strong objection to a proposed Adult Gaming Centre on [53 Sydenham Road, London SE26 4AF](#).

I am worried that this gambling shop will become a source of crime, anti-social behaviour and public disorder, especially as it will be open 24 hours and only have minimal staff.

As the father of a young child, I worry that this betting shop risks children being drawn into, exploited and harmed by gambling, and also pose a greater risk to those who are more vulnerable in our community because of their socio-economic status: "People at the greatest risk of harm are more likely to be unemployed and living in more deprived areas, have poor health, low life satisfaction and wellbeing, and have an indication of probable psychological health problems."

<https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary--2#:~:text=Prevalence%20of%20gambling%20and%20harms,by%20an%20others%20people's%20gambling>.

Speaking to my neighbours, I know they are worried, too. There are many other ways this space can be used to benefit our community.

Objector 50

I have been a resident of Girton Road, Sydenham for 37 years and I strongly oppose the opening of the amusement centre in Sydenham High Street.

I believe that the opening of this establishment will increase the likelihood of anti social behaviour in the area and problems with parking, which has already been an issue for a long period of time.

Furthermore, it will not help those who already have an issue with gambling addiction.

I hope my concerns are taken not consideration.

Objector 51

I am writing to object to the licensing of Merkur Slots at 53 Sydenham Road on the following grounds:

- To prevent gambling from being a source of crime and disorder
- To protect children and other vulnerable persons from being harmed by our exposed to exposed to gambling

There are already a number of gambling establishments on the high street that make it feel less safe - not least because people drink alcohol outside of them, blocking the pavement and arguing and/or shouting.

Any more of these businesses would make Sydenham feel saturated by gambling and unfriendly towards families. As the mother of young children this is not the direction I want my community to be moving in.

Objector 52

> I strongly object to the licence application for a slot machine shop in Sydenham High street. This will drive up crime related incidents and is harmful for young people in the local area.

>

> Please ensure that this application is denied.

>

Objector 53

> I write to express my objection to the granting of a licence to Mekur Slots to open a gaming / slot machine business at 53 Sydenham Road.

> Sydenham Road already has three betting shop premises on this stretch of the High St and there appears to be no requirement for another outlet to encourage gambling. I believe this may also be operated on a push button entry facility enabling users to access on a 24 hour basis.

> As a resident of Sydenham and living very close Sydenham Road, I believe granting a licence to a premises that promotes easy access to slot machines is an inappropriate and detrimental use of a property situated on a high street surrounded by residential properties. The premises is adjacent to a very busy bus stop, frequented by children from local secondary schools who are potentially likely to use the facilities.

> Sydenham Rd businesses are slowly returning after the effect of the pandemic, with more independent shops and outlets in place to create a community and pleasant environment . The opening of a gaming facility would not be in keeping nor add any interest or footfall for other businesses.

> I hope you will consider these points and look forward to hearing from you.

Objector 54

I am writing to express my profound objection to the proposed establishment of a 24-hour slot machine shop on Sydenham high street. I believe that such an establishment poses significant risks to the community, its residents, and the overall well-being of our neighbourhood.

First and foremost, the extended operating hours of a slot machine shop create an environment that encourages excessive gambling, potentially leading to addiction-related issues among vulnerable individuals. The accessibility and constant availability of such establishments can contribute to a rise in gambling-related problems, adversely affecting the mental health and financial stability of our community members.

Furthermore, the introduction of a 24-hour slot machine shop may attract an undesirable clientele, increasing the likelihood of criminal activities in the vicinity. Research has shown a correlation between gambling establishments and an upsurge in criminal incidents, including theft, fraud, and disorderly conduct. Our local high street should be a safe space for families, residents, and businesses, and introducing a facility that may compromise this safety is unacceptable.

In addition to the social concerns, the potential negative impact on property values cannot be overlooked. The presence of a 24-hour slot machine shop may deter potential homebuyers and negatively influence the perception of our community. This, in turn, could result in a decline in property values and hinder the growth and development of the local real estate market.

Moreover, there is a moral obligation to protect the most vulnerable members of our community, such as minors and individuals struggling with addiction. The establishment of a 24-hour slot machine shop contradicts our responsibility to create an environment that fosters the well-being of all residents, including those who may be more susceptible to the harmful effects of gambling.

In light of these concerns, I respectfully request that the relevant authorities conduct a thorough review of the potential consequences and consider the long-term impact on our community.

I appreciate your attention to this matter and trust that you will prioritize the well-being and interests of our community and deny this application.

Objector 55

I have been made aware of an application for a 24 hour slot machine business on our high street (next to the huge vape store you have allowed to be newly opened).

I am not sure why Sydenham Council is taking such an active part in the degradation of its own high street, residents and children who travel past these places, but I would like to lodge an objection to this business application and plead with you to take a better interest and care in what is happening on Sydenham's high street.

I object for the following reasons:

To prevent gambling from being a source of Crime & Disorder

To ensure that gambling is conducted in a fair and open way

To protect children & other vulnerable persons from being harmed or exploited by gambling

Objector 56

I'm writing to object to the granting of a bingo premises licence at 53 Sydenham Road. I am a resident on connecting Girton Road and am a daily user of the high street by foot.

I am already concerned at the anti-social behaviour that the existing gambling establishments on Sydenham Road (William Hill, Paddypower, Ladbrokes) attract, and I am concerned that a further gambling premises - especially one with a 24 licence - is only going to make this situation worse.

As it stands, in the past two weeks alone I have been harassed while walking along the high street by inebriated individuals loitering outside the above gambling establishments, including being shouted at across the street by a man stood outside the William Hill betting shop. It's threatening and it does not contribute to a positive environment for users of the high street.

I strongly urge you to not grant a licence to a further gambling establishment, or at the very least severely restrict its hours of operation.

Objector 57

I have been made aware of an application by "Merkur Slots" to open a slot machine shop at 53 Sydenham road. This operation is apparently mostly going to be an unstaffed slot machine shop running 24 hours a day.

I object on the basis that we have three care homes for people with mental health issues within a short walk of the proposed site - Apex Lodge, Lawrie Park Lodge and Woodham Care Home. We also have three staffed gaming shops already on Sydenham high street - Ladbrokes, William Hill and Paddy Power. This ensures adequate supply of gaming options which are open until 10pm and they are all staffed to ensure that vulnerable people are kept safe.

Objector 58.

> I would like to object to the above application for the following reasons:

>

> 1. I am concerned that having such a premises in the middle of a busy high street is a potential source of crime and disorder.

>

- > 2. That having an unsupervised and long hours operation, again in a busy high street area is a risk to children and other vulnerable persons being exploited or harmed by gambling.
- >
- > 3. That allowing such a premises is contrary to the principles stated in the Local Government Association report "Tackling Gambling related harms" that "councils should seek to prevent exposure at a population level to harmful gambling products and practices."
- >
- > For these reasons I would ask that this application be rejected.
- >
-

Objector 59

- > I'm a resident in Sydenham and live very close to the high street (Sydenham Road).
- > I would like to strongly object to the application by Merkur Slots to install gambling machine at 53 Sydenham Road. Sydenham Road is a busy high street visited by a lot of kids. Children take buses to / from schools and I can see them going to the shops after they get out of buses. Introducing a gambling outlet in such a prominent place will just increase the risk of children (and vulnerable adults) being drawn into the world of gambling. In addition, gambling can lead to increased crime and disturbances, which is already high in the area.
- >
- > Thank you for your consideration.
-

Objector 60

I wish to make my objections known the gambling license application by Merkur Slots for the premises at 53 Sydenham Road, SE26.

My grounds for objection are as follows...

- To prevent gambling from being a source of Crime & Disorder - I believe a business of this nature will lead to an increase in crime and disorder in the local area & due to the 24 hour nature of the business it will make the area feel unsafe, especially at night.
 - To ensure that gambling is conducted in a fair and open way - I believe this will be compromised due to the largely unmanned nature of the business.
 - To protect children & other vulnerable persons from being harmed or exploited by gambling - it is generally accepted that gambling impacts the most vulnerable members of society and funding to help combat this is at an all time low. There is already a glut of bookmakers etc. in the local area and having access to this establishment 24 hours a day will only increase the damage done. If the premises are largely unmanned, what safeguards are there from stopping under 18's accessing the site?
-

Objector 61

> I am writing to express my strong objection to Merkur Slots' application for a Bingo Premises Licence at 53 Sydenham Road.

>

> This business would be detrimental to our high street, and puts children and other vulnerable persons at risk of being harmed or exploited by gambling. I am also concerned that slot machines in our neighbourhood would lead to gambling being a source of crime and disorder in the area.

>

> I urge you to reject this application for the good of the community.

Objector 62

I'm objecting to the application for a licence for Merkur Slots to be given a property on Sydenham Road and be given permission for the change of use of the ground floor of 53 Sydenham Road. I will send objections to Planning on similar grounds.

I object on these grounds:

1. CRIME AND DISORDER

Gambling is almost always a potential or actual source of crime and disorder due to the fact that users are vulnerable and affected by poverty and the need for money to gamble. Gambling is an addictive pass-time as has been well documented.

24/7 trading doesn't exist on the rise and would be an unwelcome presence. It will cause noise and potential disorder and the street drinkers who are around will be drawn in not least when it is cold or wet. There have been instances where empty properties have been broken into due the need for shelter.

2. GAMBLING IS CONDUCTED IN A FAIR AND OPEN WAY. I don't accept that this premises is ensuring that Gambling is conducted in a 'fair - and open way nor see how it can. The point of the place us to make a profit. If people are vulnerable what safeguarding is there? What are the rules and how will they be applied? Most gamblers are already addicted or prone to Gambling.

If Merkur is the only place open it has an unfair advantage. Other established Gambling establishment close in the evenings and keep regular hours.

Crowding and congregating on the street will cause affray and conflicts. Other closed properties will be at risk. Other residents using the road to get home or continue journeys could be adversely affected.

There are houses on the road that are lived in by residents - i. e none commercial properties. Going home late at night could be more unsafe. Noise and disruption could affect their sleep.

3. TO PROTECT CHILDREN & YOUNG PEOPLE. Young People should not be tempted to use such facilities and not face situations where they can be pressurised by other adults into taking part, lending or borrowing money. The enticement of winning will encourage more use. The likelihood of winning is extremely low. Gambling is addictive. There have been instances of violence to young people in Sydenham. This is a potential hotspot for trouble. Many YP don't have official ID. There may be fraud taking place and trading other counterfeit goods in order to gain fake ID.

The premises have smoked glass which is out of keeping with the other shops on the road. Most shoppers use the shops for regular purposes - food, cafes, chemists, provisions, medicines etc. The look of Merkur implies membership and is unwelcoming and unfriendly. It isn't accessible to all.

Increased poverty and insecurity for those affected by cost of living difficulties will not be helped by such a facility and will only deplete their limited income.

I think their application(s) should be turned down. There is no place for them here, in my judgement.

Objector 63

Objection to Merkur Slots application to open slot machine business at 53 Sydenham Rd

Gambling is a major public health issue; it is a serious problem that is worsening in the UK and locally. Gambling affects not only the individual but families and the wider community.

In 2019 the Department of Health and Social Care commissioned Public Health England to undertake a review of the evidence of gambling harms. The evidence is clear, why are Lewisham Council considering this application.

I object to this proposal and hope that Lewisham Council will prioritise and protect the health and well-being of their community in turning down this application.

To Protect Children and Other Vulnerable Persons from Being Harmed or Exploited by Gambling

Gambling organisations are preying on people's addictions and encouraging gambling addiction. A slot machine gambling set up appears to target vulnerable members of our community and may well be the beginning of addiction that will lead to serious gambling harm.

Harms from gambling include financial harm, debt, employment risks, and can lead to bankruptcy. Gambling can impact directly on children and families when Gambling can cause relationship breakdowns, social isolation, desperation, and suicide.

The burden of gambling harms impact those already facing disadvantage and will serve to widen existing health inequalities.

Gambling impacts and puts additional stress on children and vulnerable families, when money needed to provide basic food, warmth and clothing is spent on gambling. When gambling causes relationship breakdowns, it adversely affects children's mental and emotional health as well as physical health. Rent money gambled away may lead to homelessness and families split up.

This proposed gambling facility is on the High Street, next door to Boots the Chemist and a family run curtain shop right by a busy bus stop used by children and young people travelling to and from school and college, it could therefore normalise gambling and make it seem respectable and part of community life making it something young people would want to join in as soon as old enough. Supporting the drawing in of young and/or vulnerable people into the world of gambling and addiction.

To Prevent Gambling from Being a Source of Crime and Disorder

This part of Sydenham High Street with the pocket park end to Queensthorpe Road tends to get vulnerable people and people with substance misuse addictions congregating. This is not going to help but is in fact likely to worsen the issue and make it feel even less safe for women in particular travelling at home late at night.

To Ensure Gambling Is Conducted in a Fair and Open Way

This venue seems to be mainly unsupervised or staffed, I am unsure how it will be possible in such a venue to ensure gambling is conducted in a fair and open or safe way.

Retired Public Health Specialist Practitioner

Objector 64

As a Sydenham resident for over 30 years I am writing to you to register my opposition to the application for Bingo premises at the above. I can see no justifiable reason for allowing this to be granted in an area where there is significant issues relating to poverty as this seems to me to be only viable if it successfully encourages those with little to squander what they have. Minimum manning will not lead to any positive outcomes and makes it all that easier to avail those struggling with addiction to succumb. There is also the effect it will have on the area's young population as button entry will not be a difficult security feature for them to overcome and indeed may encourage more to again spend and fall into addiction. There is a reason why betting shops were criticised for having slot machines but at least they were always manned and not 24 hours. Please do not permit this license in any form.

Objector 65.

I hereby object to the application by Merkur/Eyas Gambling to open a premises at 53 Sydenham Road on the grounds of the need to protect children and vulnerable adults.

I live locally and walk down this street many times a week. The location is far from suitable not least as there is a bus stop just outside where many, many children

congregate or pass through daily, over many hours. This presents a clear risk to these children and other vulnerable people who cannot afford to be sucked in by unaffordable and repeat gambling.

With a single staff member it is also implausible that age restrictions and other restrictions on vulnerable people under legislation can be adequately policed/enforced.

Objector 66

I know that moral standing and personal opinion unfortunately won't hold much sway on decisions like this so I will place to one side the fact that gambling preys on those lesser fortunate in society and creates more societal problems rather than adds to the well-being of a community.

That being said, I am not opposed to different/new businesses to the high street (especially in place of a potential long-standing empty unit) as long as they provide something different, useful and contribute to the wider community.

In the case of Merkur slots this is CLEARLY not the case.:

- It is stated that it is largely unpersonneled meaning the community will not hugely benefit from employment opportunity compared to the vast majorities of other possible businesses
- Being 24 hour, this may cause issues with the residents in the immediate vicinity re: noise pollution/other
- Although this could be seen as a "different" type of gambling premises. There are THREE bookmakers - William Hill, Ladbrokes and Paddy Power - all within a 2 minute walk of this premise, each of which are places people are able to gamble and typically have one or more gambling/slot machines in.
- As this is a specific/niche business both in terms of age restrictions and in terms of use by a very narrow specific group of the community, it does not benefit a large amount of the greater community. Those below gambling age (18) can not access it and it is not something that people might generally use - such as a cafe, food shop, general store or many many others.

I sincerely hope my comments and all others, are taken seriously when making decisions for the high street which is generally an independent, well used community resource for all that improves people's daily lives, not detracts from it as I believe this business unfortunately would.

Objector 67

Please do not make my address public; I am purposefully not on the public version of the electoral roll

I wish to raise an objection to a new premises licence under the Gambling Act 2005 being issued at 53 Sydenham Road, London SE26 5EY.

I note the following grounds for objection -

- 1.To prevent gambling from being a source of Crime and Disorder
- 2.To ensure that gambling is conducted in a fair and open way
- 3.To protect children and other vulnerable persons from being harmed or exploited by gambling

I wish to raise concerns under points 1 and 3 above.

I live on one of the roads just off Sydenham High Street and was very concerned to learn of this proposed development. My husband and I have two young children; we love living in Sydenham because the area feels safe for families. In particular, we enjoy taking our young children to shop on the high street, and feel a responsibility to do so in these challenging times so that we can support the local businesses that make our community so great.

Put simply, we will be less likely to spend time (and money) on the high street if this application is allowed to proceed. I believe that it will negatively alter the dynamic of the high street and make it less family-friendly; it is a fundamentally different proposition to the “traditional” bookmakers already on the high street. In addition to making our local high street far less welcoming for families, you will be aware of the high concentration of schools in Sydenham, and the high street being on the route to or from school for lots of local children, including unaccompanied teenagers. I can see a clear risk that this development will create an opportunity for underage gambling, particularly given the low level of staffing proposed by the developer. With increasing awareness of the long-term risks to both the individual and wider society caused by gambling, I hope the Committee will agree that a bustling high street in an area full of families is an inappropriate location for such a business.

I am concerned that the developer has not properly acknowledged nor mitigated the likely crime and public safety implications of such a development. As a woman, I feel safe and able to walk home from the station at night but I would have to rethink this if this application were allowed to go ahead. Having looked at the application, I am worried that this venue is likely to lead to increased antisocial behaviour, particularly late at night, given this is proposed to be a 24/7 venue. To me, it feels completely different to the rest of the late nighttime economy on the high street, which is made up of a 24/7 gym and a few takeaways. I’m personally worried about what this will mean for me if I need to get home safely from the station at night, and hope that the Council will agree that we need to keep the high street safe for everyone living in the area.

Objector 68

To whom it may concern

I am writing to object to converting 53 Sydenham rd in to a slot machine business. I feel that 24 hour gambling could lead to an increase in crime in the area. I also feel it is unfair on anyone in the area who may have a gambling addiction to have that available. Sydenham is a family area. As a parent I do not want my teenage son to be exposed to it.

Please reject this application.

Objector 69

> I'm writing in objection to the application for gambling license at 53 Sydenham Road. Gambling is a source of, or slippery slope to, crime and disorder. There are many vulnerable people in our community whos livelihoods would be easily threatened by taking up gambling. Additionally we have many young people, young parents, children and other vulnerable persons who could be harmed or exploited by gambling. Parts of Sydenham have been really improving in the last ten years and this feels like a real setback to our high street. Please don't let it go ahead!!!!

>

Objector 70

I am writing to express my strong objection to the proposed opening of a (largely unsupervised) 24-hour gambling establishment at 53 Sydenham Road, SE26. As a local resident, I believe that such a venture poses significant risks to the well-being and safety of our neighbourhood.

Firstly, the extended operating hours of the gambling business raise serious concerns regarding the potential for crime and antisocial behaviour within our area, particularly during the late night and early morning hours. It is widely acknowledged that gambling establishments, especially those operating during unsociable hours, can attract criminal elements and exacerbate antisocial behaviour, including theft, vandalism, and violence. Allowing such a business to operate round the clock would undoubtedly heighten these risks, placing an undue burden on local police and compromising the safety of residents.

Furthermore, the proposal to operate the premises without staff supervision presents a cause for concern. The absence of on-site personnel would create an environment ripe for exploitation, where customers could engage in unsupervised and potentially harmful gambling practices without oversight. No one needs to be in a betting shop at 3am in the morning. This not only undermines the integrity of gambling activities but also exposes vulnerable individuals and their families to exploitation and financial harm. There are numerous studies detailing the serious addictive nature of gambling and the huge burden it places on addicts, their families, the NHS and society at large.

Moreover, the lack of staffing raises significant concerns regarding the protection of children and other vulnerable persons from the harmful effects of gambling. Without adequate supervision, there is a heightened risk of under-18s gaining access to the premises, leading to potential addiction and long-term psychological damage. For young people, gambling is already normalised to a worrying extent - creating easier access to gambling will only worsen this. Additionally, individuals struggling with gambling addiction or other vulnerabilities may find it challenging to seek assistance or support in an unstaffed environment, exacerbating their plight and perpetuating cycles of harm.

Given the low staffing levels, there are also very few job opportunities to be created for the local community.

Local Sydenham residents do not stand to benefit from these proposals. In light of these concerns, I urge the council to reconsider the proposal for a 24-hour gambling business and instead prioritise the well-being and safety of our community. It is imperative that measures be taken to safeguard against the proliferation of crime, ensure the fair and regulated conduct of gambling activities, and protect vulnerable individuals from exploitation and harm.

Thank you for considering my objections to this matter. I trust that the council will act responsibly in the best interests of the community.

Objector 71

>

> To whom it may concern

> I write to express my huge disapproval of allowing a slot machine business in Sydenham. The area is struggling with cost of living issues and this would seriously hinder improvements in the area and lead to further debt.

> Sydenham long term resident

Objector 72

Member of the Sydenham Society

I am writing to object to a license for anytime gambling including 24 hour access to gambling in the previous premises occupied by Santander.

I feel that granting permission for gambling would attract vulnerable and undesirable people into a safe community driven area.

Sydenham has built up a very community friendly town over many years for all ages and we have a duty to all people especially the younger generation to protect them from excessive access to gambling!

We already have sufficient outlets for betting without imported European owners

taking over properties in our High Street for gambling.

I have been brought up and have lived in the Sydenham and surrounding area all my life and I would like to see better use of empty properties other than gambling to add to the best that Sydenham can give to all our residents.

Please do not grant this misguided licensing to owners that add to the vast swindling of money out of new and already hardened gamblers to bring our area down that may cause undesirable crimes in the area that will cause extra expenditure to policing.

It would be far better to give a license to something like a mental/psychology health educational facility, dentist, or even a bank or restaurant take over the premises. Please don't grant this license.

I would like to know what research has been done on this type of access to property use in areas that have it? Has it been profitable for the area? Has it cost more for policing crime? Has it enhanced community? Has it made areas unsafe late at night for robbery?

What are the benefits to the areas?

Objector 73

I wish to object to the application by Merkur/Eyas Gambling to open a premises at 53 Sydenham Road on the grounds of the need to protect children and vulnerable adults.

The site is extremely unsuitable as a busy high street location where it is likely to draw in children and vulnerable people who cannot afford to lose money to gambling. As a site that will operate at times with a single staff member, it will be difficult to police the age restrictions on gambling.

The site is located with a bus stop just outside where large groups of school children congregate daily - there is a huge risk that they will be tempted into the premises.

Objector 74

Having lived in Sydenham for over 30 years and very near the High St, I'm very concerned about the application submitted by Merkur Slots to open a 24/7 Slot Machine business at 53 Sydenham Road and wish to object to it.

Whilst this may provide much need business rates for Lewisham Council, it will certainly do nothing for the local community which already has 3 betting shops - a lot for a very small High St.

Why is it deemed necessary to give permission to another gambling facility?

How many jobs will it actually create?

Who will police that the gambling laws are not being broken and are being administered fairly and legitimately?

Why does it need to open 24/7?

There are a lot of vulnerable people on the High Street - what will be in place to protect them and young people who may be tempted to use such a facility?

Undoubtedly, the High Street as we know has changed, but rather than filling it with all the same shops and businesses, the Council should be making sure it's for everyone.

They should make sure that the facilities proposed will not only enhance the High St, but that they are legitimate and necessary.

A High St. filled with barber shops, nail bars and gambling facilities are not reflective of the needs of the community and the Council should therefore consider rejecting this application.

Objector 75

I wish to register my objection to the proposed opening of a slot machine gambling site at the above location - it is highly likely to attract disorderly and/or criminal behaviour in a residential area, and children and other vulnerable people are at risk of exploitation and harm from ease of access to this site.

The area is frequented by many children of school age and the presence of this site so easily accessible to them, cannot be seen in anyway as beneficial to them or their families, rather to their detriment. There is evidence in an increase in gambling addiction and its harm in children and this does not need to be further encouraged by opening this site. Children frequently use convincing fake ID to buy alcohol or enter other sites and there is no reason to think they will not do so in Merkur as well.

Objector 76

I appreciate you are very busy - so I'll keep this as short as I can.

I'm writing to object to the application regarding the opening a gaming centre at 53 Sydenham Road for the following reasons:

It is right at a bus stop where many schoolchildren, many teenagers, wait for buses (Stop G, Newlands Park).

In the middle of a cost of living crisis adding to the gambling options on the high street is unjustifiable. It can only add to the risk of people being left completely destitute.

As these establishments do not present themselves as conventional bookmakers or casinos, vulnerable members of our community in Lewisham will be drawn to an establishment like this.

Objector 77

I would like to object in the strongest terms to the granting of a license to Merkur to run an unstaffed entry gambling shop at 53 Sydenham Road, a former bank/building Society premises. It is completely unsuitable for a high street in a residential area, and near to a bus stop used by school children, and by returning commuters

This site is also very near Queensthorpe Square, which has already been plagued by drug dealing. Even if the gambling hours are limited when the shop opens, Merkur will use these as a lever to extend them to 24 hour gambling, as they did in Palmers Green and other areas. Gambling is enormously profitable for its facilitators, and imposes heavy costs on the rest of society, it acts as a source of crime and disorder, contributes to mental ill health, and exploits children and vulnerable people. Research shows that gambling can be strongly addictive, and that adolescents are highly vulnerable to psychological distress (1), and that gambling addiction is linked to other psychiatric problems (2). Seeing family members gamble normalises gambling and other risky behaviours for children (3).

Gambling machines offer an addictive and de-personalised experience of gambling. Both Italy and Finland have introduced policies to reduce their numbers and so limit their effects on public health. (4)

Even their users don't think much of Merkur - 71% of reviews on Trustpilot give them 1 out of 5. There are lengthy litanies of complaint from unhappy players on Trustpilot about the excessive demands for documentation to set up an account, and the way odds are stacked against players. Of course, the company needs to make a profit, but it is making it at the expense of the naive and over-optimistic, and apparently, not offering them a satisfactory experience. Merkur do not offer a harmless flutter, just for fun - they offer a sterile, addictive, and harmful experience. We do not want or need them here.

I.J. Towler, BSc, MRSC, PhD

(1) "Understanding the odds" McCreary Centre Society 2021

(2) Potenza, M. N. et al *Nature Reviews Disease Primers*, Vol 5, no. 51, 2019

(3) Rahman, A.S. et al *Journal of Psychiatric Research*, vol. 46, No. 5, 2012

(4) Marionneau, V., Mandolesi, G., Rolando, S., and Nikkinen, J., "Addressing gambling harms by reducing the supply of electronic gambling machines: a comparative study of Italy and Finland" *BMC Public Health*, 22, article no. 1016 (2022)

Objector 78

I write to object to the granting of a licence to Merkur Slots in respect of their application to open a slot machine business in the old Santander shop on Sydenham Road.

These premises are in a particularly heavily used part of Sydenham Road, having a Boots, a butchers and a much used fruit and veg shop close by. It is also an area which has, in the past, had problems caused by drunken behaviour.

Whilst I object generally to an application for a business of this type on Sydenham Road, I would point out that 53 Sydenham Road is particularly close to a bus stop which serves 3 buses. The area is very busy and the pavement around this bus stop often heavily congested. The stop is also used by pupils from the local secondary school. To offer this enticement to youths at this impressionable age is appalling and totally unacceptable. We have a duty to protect children and other vulnerable people from being harmed or exploited, the very position makes this impossible if this application is to be granted.

My wider point is that any gambling, alone on a main thoroughfare such as Sydenham Road, encourages crime and disorder. Given the paucity of police cover in this neighbourhood, this alone should be a cause to refuse this application

In addition, it is well established that slot machines can and often do lead to problem gambling. In a time of crisis in the cost of living we should not allow anything which may tempt people with little to gamble in the hope of making some money. That, as we know, can and often does lead to marriage breakup and even suicide.

This application should be refused on many grounds, it is entirely inappropriate to have a business of this type in the heart of Sydenham.

Objector 79

I think this is a terrible idea. There are other places that people can play slots already eg the bookies at Kirkdale / Dartmouth Road but to encourage gambling in this borough , where the slots always win in the end , is irresponsible at best.

a worker in the area



THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

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

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

- Cashino Gaming Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Cashino Gaming Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Cashino Gaming Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Cashino Gaming Limited premises operate digital CCTV and customer areas are supervised.
- Cashino Gaming operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- All Cashino Gaming premises provide a static alarm system which is also supported by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Cashino Gaming Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Cashino Gaming employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Cashino Gaming operate a robust late night working policy, which is fully supported by a full-time Night Manager.
- Cashino Gaming does not operate a single-manning policy between 8pm and close, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

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

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.

Cashino Gaming Limited

Operational Standards

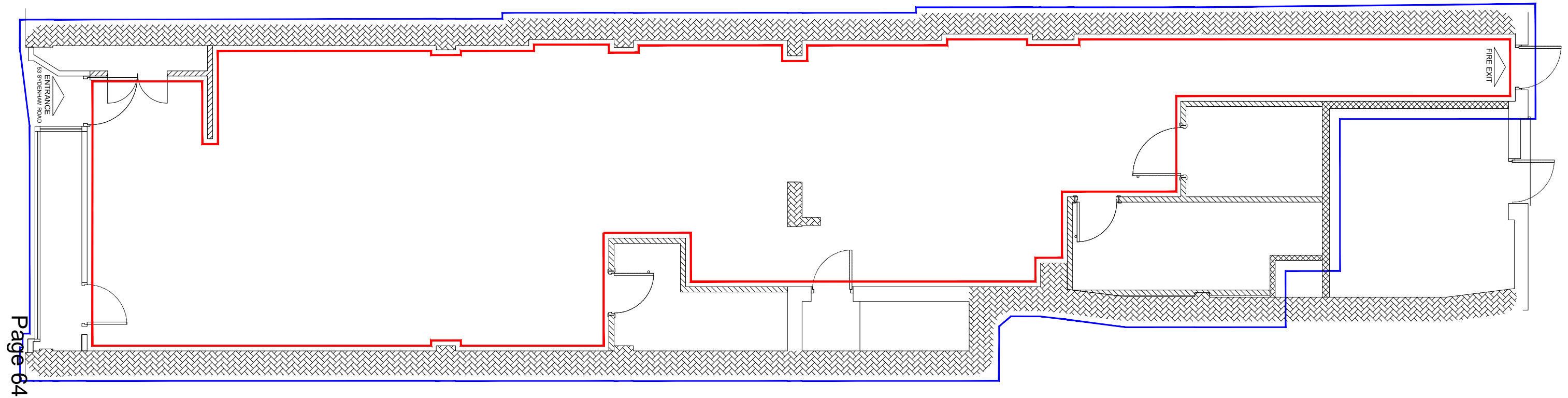


- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our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

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

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

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



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<p>LICENSE PLAN LEGEND</p> <table border="1"> <thead> <tr> <th>LINE TYPE</th> <th>LINE TYPE DESCRIPTION</th> </tr> </thead> <tbody> <tr> <td></td> <td>AREA IN WHICH FACILITIES WILL BE PROVIDED FOR GAMING.</td> </tr> <tr> <td></td> <td>EXTENT OF PREMISES</td> </tr> </tbody> </table>	LINE TYPE	LINE TYPE DESCRIPTION		AREA IN WHICH FACILITIES WILL BE PROVIDED FOR GAMING.		EXTENT OF PREMISES	<p>REVISIONS REV 00:</p>	<p>FIT OUT TYPE LICENCING</p> <p>PROJECT MERKUR SLOTS 53 SYDENHAM ROAD SYDENHAM SE26 5EY</p> <p>DESCRIPTION PROPOSED LICENCE PLAN</p>	<p>REFERENCE DRAWINGS</p> <p>SCALE 1:75</p> <p>DRAWN BY LR</p> <p>DATE 21/11/23</p> <table border="1"> <tr> <td>DRAWING No. 886-PL-14</td> <td>REVISION 00</td> </tr> </table>	DRAWING No. 886-PL-14	REVISION 00	<div data-bbox="2368 1730 2902 1919" data-label="Image"> </div> <p><small>COPYRIGHT IS RESERVED BY MERKUR CASINO UK AND IS ISSUED ON THE CONDITION THAT IT IS NOT COPIED OR DISCLOSED BY OR TO ANY UNAUTHORISED PERSONS WITHOUT PRIOR CONSENT FROM MERKUR CASINO UK.</small></p>
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GAMBLING ACT 2005 LICENSING PLAN
Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for illustrative purposes only, and does not form part of the premises licence.

Merkur Slots, 53 Sydenham Road, London, SE26 5EY

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	53 Sydenham Road, London, SE26 5EY
Local Authority:	London Borough of Lewisham
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-029 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK, Second Floor Matrix House, North Fourth Street, Milton Keynes, MK9 1NJ
Name and Title of Assessor:	Amanda Kiernan – Head of Compliance
Date of Assessment:	28 th December 2023
Review Date:	On opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	53 Sydenham Road, a former Santander Bank is located on the main road in Sydenham. The premises in the immediate area include convenience stores, coffee shops, restaurants, takeaways, banks, supermarkets, hair and beauty salons, betting shops, pawnbrokers, pharmacies and property agencies. Sydenham's commercial centre starts on Kirkdale near Cobbs Corner, continuing onto its high street, Sydenham Road. Sydenham has a distinct town centre with many independent shops, restaurants, cafes as well as chain stores and supermarkets. The premise sits within the Sydenham Ward Area. There is a significant level of social housing in the ward, with the principal housing providers being Hexagon Housing and Lewisham Homes.
Establishments of note:	Sydenham is an active community including local residents' groups, a thriving arts scene and a developing high street with many local shops and restaurants. There are a number of active and influential voluntary and community sector organisations in the ward, including the Sydenham Society, Sydenham Arts, The Grove Centre and James Ross Hunter Youth Support.
Adjoining premises:	53 Sydenham Road is located between Sydenham Household shop and Boots Pharmacy.
Crime statistics:	Sydenham Road is located within the Sydenham policing neighbourhood, under the Metropolitan Police Service force area. The most commonly reported crime types in the past 12 months were: Violence and sexual offences 26.9%, Anti-social behaviour 19.7%, Vehicle crime 12.3%, Other theft 9.2%, Burglary 8%, Criminal damage and arson 7.6%, Public order 6%, Drugs 3.3%, Shoplifting 1.9%, Robbery 1.7%, Bicycle theft 1.1%, Theft from the person 1.1%, Other crime 0.9%, Possession of weapons 0.4%. The crime rate in Sydenham is higher than the average crime rate across similar areas and similar to average for the Metropolitan Police force area. In October 2023, 147 crimes were recorded within a half mile of the venue. The most commonly recorded crimes were: 33 Violence and sexual offences, 31 Anti-social behaviour, 17 Vehicle crime, 15 Public order. (<i>police.uk</i>)
Population:	48.8% of the area's population are male which is lower than the UK average of 49%. The majority of the population are in the age group 25-29 and the majority 57.2% are single. (<i>streetcheck.co.uk</i>)
Culture:	Sydenham Road can be considered more ethnically diverse than the UK average. As whole, the UK population claims itself as approximately 82.2% white, with residents of this area being 67% so. Other sizable ethnic groups in this area are: 8.9% Black African, 6.9% Mixed Ethnicity, 3.6% Other, 3.1% Black Caribbean, 2.4% Bangladeshi and 2.4% Chinese. (<i>streetcheck.co.uk</i>)
Employment:	4.4% of residents are unemployed. 70.7% of residents are economically active with 66.6% in employment. 29.3% of the economically inactive. 8.7% are retired, 7.8% are students, 2.9% look after home/family, 4.4% are long term sick or disabled. The majority of those employed work in Professional Occupations 20.5%. 17.6% are Managers, Directors and Senior Officials. (<i>streetcheck.co.uk</i>)
Deprivation:	In the latest Index of Multiple Deprivation (IMD) this area was ranked 16,395 out of 32,844 in England, where 1 was the most deprived and 32,844 the least. Overall deprivation in Sydenham is better than 49% of areas in England, Income deprivation is better than 48% of areas in England, Employment Deprivation is better than 62% of areas in England, Health Deprivation is better than 62% of areas in England, Education Deprivation is better than 60% of areas in England, Barriers to Services Deprivation is better than 34% of areas in England, Living Environment Deprivation is better than 21% of areas in England, Crime Deprivation is better than 25% of areas in England. (<i>UK local Area.com</i>)
Local Police:	Lewisham Police Station, 43 Lewisham High Street SE13 5JZ Metropolitan Police Services. The current police priorities in Sydenham, as highlighted on the https://www.police.uk/ website, are Violence with Injury offences, Violence Against Women and Girls; E-scooter use, particularly high speeds along residential roads and pavements which can be dangerous to pedestrians, continued begging outside supermarkets, drug use in parks and residential areas; Theft of tools from builders' vans, theft of number plates from vehicles and catalytic convertors.
Independent Security Reviews	MERKUR Slots UK appointed Leveche Associates Ltd to conduct independent covert visits on numerous AGC/Bingo venues that operate throughout the UK 24-hrs, 7 days a week including six venues in and around the London area. Key comments from the reports include: 'Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and do not attract or take advantage of juveniles or other vulnerable persons'. 'MERKUR Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards'. 'The presence of MERKUR Slots does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to'.

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

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

Localised Risks to the Licensing Objectives

This Local Area Risk assessment takes into consideration Lewisham Council local authority Statement of Gambling Policy 2019–2022 (and draft 2023–2026), Part A to C (reference 10.2 for Bingo Centres) and Lewisham Council Borough Profile for Sydenham Ward 2022.

Environmental Factors

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

Licensing Objectives	Local Risks	Control Measures
Protecting children and other vulnerable people from being harmed or exploited by gambling Page 67	<p>Unemployment: 4.4% of residents are unemployed. 70.7% of residents are economically active with 66.6% in employment. 29.3% of the economically inactive. 8.7% are retired, 7.8% are students, 2.9% look after home/family, 4.4% are long term sick or disabled. The majority of those employed work in Professional Occupations 20.5%. 17.6% are Managers, Directors and Senior Officials. (streetcheck.co.uk)</p> <p>Deprivation: In the latest Index of Multiple Deprivation (IMD) this area was ranked 16,395 out of 32,844 in England, where 1 was the most deprived and 32,844 the least. Overall deprivation in Sydenham is better than 49% of areas in England, Income deprivation is better than 48% of areas in England, Employment Deprivation is better than 62% of areas in England, Health Deprivation is better than 62% of areas in England, Education Deprivation is better than 60% of areas in England, Barriers to Services Deprivation is better than 34% of areas in England, Living Environment Deprivation is better than 21% of areas in England, Crime Deprivation is better than 25% of areas in England. (UK local Area.com)</p> <p>Schools and Education: Haseltine Primary School, Haseltine Road Bell Green, SE26 5AD Kelvin Grove Primary School, Kelvin Grove, Catford SE26 6BB Adamsrill Primary School, Sydenham, London SE26 4AQ Sydenham School, Dartmouth Rd, London SE26 4RD St. Bartholomew's Primary School, The Peak, Catford SE26 4LJ Forest Hill School, Dacres Road, London SE23 2XN Alexandra Junior School, Cator Road, Penge SE26 5DS</p>	<p>Age Verification <i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Sydenham Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p> <p>Age verification test purchasing, and mystery shopper visits are frequently carried out by third party companies – ServeLegal and Store Checker. Age verification tests for 2023 pass rate of 89% is higher than the industry average, all venues receive 2 or 3 random test visits per year.</p>

	<p>St. Michael's Church Of England Primary School, Champion Road, London SE26 4HH Sydenham High School – Prep, 19 Westwood Hill, Catford SE26 6BL Brent Knoll School, Perry Rise, London SE23 2QU Eliot Bank Primary School, Thorpewood Avenue, Lewisham SE26 4BU St. Bartholomews Pre-school, St Bartholomew's Church Hall, London SE26 6QR Father Larkin Pre School, Coombe Road, Se SE26 6QW Elocution For Kids, 28 Jews Walk, London SE26 6PL T D Training Centre, 291 Regent House Business Centre Kirkdale, London SE26 4QD</p> <p>Community Centres and Youth Centres: Penge East Community Centre, 13 Station Road, SE20 7BE TNG Youth & Community Centre, 111 Wells Park Rd, SE26 6AD The Grove Centre Church, 2 Jews Walk, SE26 6PL</p> <p>Parks, play grounds and sports/leisure facilities: Sydenham Wells Park, 14 Taylor's Lane, London SE26 6LA Alexandra Recreation Ground, 11, Studland Road, Bromley SE26 5ND Mayow Park, Mayow Park Mayow Road, London SE26 4JA Home Park Adventure Playground, Winchfield Road, SE26 5TH The Gym Group London Sydenham, 74-78 Sydenham Road, London SE26 5QE PureGym London Sydenham, 291 Kirkdale, London SE26 4QD Shapers Sydenham, 10 Station Approach, Sydenham SE26 5EU</p> <p>Vulnerable and addiction support services: Humankind PCRS, 55 Dartmouth Rd, London SE23 3HN Supporting Hands Detox and Recovery Service, 21 Whateley Rd, London SE20 7NE James Ross Hunter Youth Support CIC, 111 Wells Park Road, SE26 6AD</p> <p><i>James Ross Hunter Youth Support - Our vision This non-profit organisation was launched in July 2014. Our aim is to encourage positive social values in youths and communities. We are currently based at TNG Youth and Community center at 111 Wells Park Road, Sydenham SE26 6AD.</i></p> <p><i>All our activities are community and family-based and are geared towards encouraging and creating positive social values in our young people. Without the community fundraising efforts and generous donations, we would not be able to create visual awareness through our yearly anti-knife crime poster competition, events, and projects.</i></p>	<p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>The children and young persons gambling participation survey shows that the number of 11-16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated.</p> <p>We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 'marginal gamblers induced to participation by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified' https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</p> <p>Vulnerability Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction. Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p>
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	<p>Homeless shelters and food banks: The Salvation Army, 172-176, Maple Road, Bromley SE20 8JB Centre Point, 152 Kirkdale, London SE26</p> <p>Medical Centres, Care Homes and Mental Health facilities: The Vale Medical Centre, 195-197 Perry Vale, London SE23 2JF Sydenham Green Group Practice, 26 Holmshaw Close, SE26 4TH Wells Park Practice, 1 Wells Park Road, London SE26 6JQ Peartree Care Centre, 195-199 Sydenham Road, SE26 5HF Elwis House, Flat 1 Elwis House, London SE26 5TP Woodham House Newlands, 33 Newlands Park, SE26 5PN Sutherland Court Extra Care Housing, Thesiger Rd, SE20 7NN, United Kingdom, SE20 7NN Lawrie Park Lodge, 27, Lawrie Park Road, SE26 6DP Parkside — Leonard Cheshire Disability, 79 Thicket Road, Penge SE20 8DS VSC Psychotherapy London, Kingsthorpe Rd, London, SE26 4PG Kirsty Rankine, 48 Newlands Park, London, SE26 5NE Amaudo UK, Forest Hill Methodist Centre, Normanton Street, London SE23 2DS Newlands Park Natural Health Care Centre, 48 Newlands Park, London SE26 5NE</p> <p>Pawnbrokers and Loan Shops: H&T Pawnbrokers, 37 Sydenham Rd, London SE26 5EX Captains Of London, 79 Sydenham Rd, London SE26 5UA H&T Pawnbrokers , 136 High St, London SE20 7EU</p> <p>Gambling premises: Admiral Casino, 3 COLMAN HOUSE, High St, London SE20 7EX William Hill, 93 Sydenham Rd, London SE26 5UA William Hill, 153 High St, London SE20 7DS William Hill, 195 Perry Vale, London SE23 2JF Paddy Power, 89 Sydenham Rd, London SE26 5UA Ladbrokes, 85 Sydenham Rd, London SE26 5UA Ladbrokes, 297 Southend Ln, London SE6 3ND Coral, 120, 122 Kirkdale, London SE26 4BB</p> <p>Public Houses and Alcohol Licensed Premise: The Dolphin, 121 Sydenham Rd, London SE26 5HB Golden Lion, 116 Sydenham Rd, London SE26 5JX The Alfred London, 178 Sydenham Rd, London SE26 5RP The Pub, 82 Newlands Park, London SE26 5NB The Pavilion, 325 Kirkdale, London SE26 4QB The Greyhound Sydenham, 313-315 Kirkdale, London SE26 4QB Fox and Hounds, 150 Kirkdale, London SE26 4BB The Bricklayers Arms, 189 Dartmouth Rd, London SE26 4QY Railway Tavern, Lower Sydenham, 401 Southend Ln, SE26 5BH Bridge House, Bridge House, 2 High St, London SE20 8RZ The Alexandra, 163 Parish Ln, London SE20 7JH The Crooked Billet, 99 High St, London SE20 7DT</p>	<p>Merkur Slots take 'know your customer' seriously including affordability checks, engaging with customer on products to enabled an informed choice and take a risk-based approach to harm minimization.</p> <p>Customer Interaction Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Player Protection <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i> <i>Failure to provide information to customers on responsible gambling</i> <i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p> <p>Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.</p> <p>'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are in prominent locations within the premise and in private areas, such as customer toilets. Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling.</p> <p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines. All machines display Gamble Responsibly stickers with helpline contact details.</p> <p>Senior Management are members of the BACTA Divisional and Socially Responsible Committees and Bingo Association Executive and Socially</p>
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	<p>The Hill, 45-47 Dartmouth Rd, London SE23 3HN</p> <p>Residential Areas: The area containing Sydenham Road consists predominantly of flats, which is common in inner cities, student neighbourhoods and poorer suburban settings. The area contains a higher-than-average level of rented housing (excluding social housing) – 67% of household spaces. This contrasts with the national average of just over 20%.</p> <p>Bus stops and other Transport links: Newlands Park (Stop G&H), London SE26 5EX Sydenham Overground Station, London SE26 5EU</p> <p>Locally Identified Premises: Sydenham Centre, 44A Sydenham Rd, London SE26 5QX</p> <p>Regular Festivals, Town Events and Mass Gatherings: SYDENHAM ARTS FESTIVAL in and around Sydenham for two weeks every July.</p> <p>James Ross Hunter Youth Support – event held throughout May <i>Volunteers are welcome to join us in making a difference of care in our communities. All of May is an awareness platform used to sensitised the public about the consequences' of carry knives and support victims voices. One minute silence is held on May 31st 11:00am in unity and schools and varied organisations are invited to develop a session of visual creation leading up to the 31st.</i></p>	<p>Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.</p> <p>The Gamcare Helpline Annual Statistics 2020 reported that calls received from people experiencing problems with their gambling were low in High Street Arcade Gaming Machines at 3% compared to Betting Shop Gaming Machines at 15%. The vast majority of calls were received from people within the on-line sector.</p> <p>Deprivation Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.</p> <p>Homelessness Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge.</p> <p>A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p> <p>MERKUR staff are aware of where rough sleepers sleep and beggars loiter in the local area and actively prevent them from entering the premise, including close monitoring of individuals spending coins/low level amounts on a frequent basis.</p> <p>Should loitering increase due to extended hours additional notices will be added about loitering without play not being tolerated.</p>
<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p>Crime statistics: Sydenham Road is located within the Sydenham policing neighbourhood, under the Metropolitan Police Service force area. The most commonly reported crime types in the past 12 months were: Violence and sexual offences 26.9%, Anti-social behaviour 19.7%, Vehicle crime 12.3%, Other theft 9.2%, Burglary 8%, Criminal damage and arson 7.6%, Public order 6%, Drugs 3.3%,</p>	<p>Premise Security and violence in the workplace <i>Poor security control measures which may increase vulnerability to crime Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots Sydenham is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed.</p>

Shoplifting 1.9%, Robbery 1.7%, Bicycle theft 1.1%, Theft from the person 1.1%, Other crime 0.9%, Possession of weapons 0.4%. The crime rate in Sydenham is higher than the average crime rate across similar areas and similar to average for the Metropolitan Police force area. (*police.uk*)

In October 2023 ,147 crimes were recorded within a half mile of the venue. The most commonly recorded crimes were: 33 Violence and sexual offences, 31 Anti-social behaviour, 17 Vehicle crime, 15 Public order. (*police.uk*)

Local Police:

Lewisham Police Station, 43 Lewisham High Street SE13 5JZ
Metropolitan Police Services.

The current police priorities in Sydenham, as highlighted on the <https://www.police.uk/> website, are Violence with Injury offences, Violence Against Women and Girls; E-scooter use, particularly high speeds along residential roads and pavements which can be dangerous to pedestrians, continued begging outside supermarkets, drug use in parks and residential areas; Theft of tools from builders' vans, theft of number plates from vehicles and catalytic convertors.

Public Houses and Alcohol Licensed Premise:

The Dolphin, 121 Sydenham Rd, London SE26 5HB
Golden Lion, 116 Sydenham Rd, London SE26 5JX
The Alfred London, 178 Sydenham Rd, London SE26 5RP
The Pub, 82 Newlands Park, London SE26 5NB
The Pavilion, 325 Kirkdale, London SE26 4QB
The Greyhound Sydenham, 313-315 Kirkdale, London SE26 4QB
Fox and Hounds, 150 Kirkdale, London SE26 4BB
The Bricklayers Arms, 189 Dartmouth Rd, London SE26 4QY
Railway Tavern, Lower Sydenham, 401 Southend Ln, SE26 5BH
Bridge House, Bridge House, 2 High St, London SE20 8RZ
The Alexandra, 163 Parish Ln, London SE20 7JH
The Crooked Billet, 99 High St, London SE20 7DT
The Hill, 45-47 Dartmouth Rd, London SE23 3HN

Pawnbrokers and Loan Shops:

H&T Pawnbrokers, 37 Sydenham Rd, London SE26 5EX
Captains Of London, 79 Sydenham Rd, London SE26 5UA
H&T Pawnbrokers , 136 High St, London SE20 7EU

Gambling premises:

Admiral Casino, 3 COLMAN HOUSE, High St, London SE20 7EX
William Hill, 93 Sydenham Rd, London SE26 5UA
William Hill, 153 High St, London SE20 7DS
William Hill, 195 Perry Vale, London SE23 2JF
Paddy Power, 89 Sydenham Rd, London SE26 5UA
Ladbroke's, 85 Sydenham Rd, London SE26 5UA

Merkur Slots Sydenham will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.

Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed, and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.

General Crime and Disorder

*To identify aggressive customers to prevent crime and disorder
Awareness of local crime issues in the local area*

We have reviewed the Police.UK hot-spot mapping for the local policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with local Police over reducing our involvement in any incident.

Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.

All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.

Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.

The company operate an internal security alert system and are registered with trade associations for crime bulletins (BACTA and Bingo Association).

Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.

Merkur Slots Sydenham will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.

Anti-social behaviour outside the premise

Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances

Ladbrokes, 297 Southend Ln, London SE6 3ND
 Coral, 120, 122 Kirkdale, London SE26 4BB

Residential Areas (impacted by Anti-Social Behaviour):
 Anti-social behaviour is the second, most commonly recorded crime type in Sydenham area. In October 2023, 28 anti-social incidents have been reported within half a mile of Sydenham Road, Lewisham, London, SE26 5EX. The most affected is around Queensthorpe Mews.

and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.

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

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

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

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

Should there be an increase in people congregating outside the premise due to extended trading hours, appropriate signage will be displayed to deter people from loitering.

Additional signage 'leave quietly' signage will be added to advise customers to respect local residents.

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

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

Where there are pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.
 IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.

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

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

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

Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member. Such times when Merkur Slots choose to single man is strictly controlled and are never planned to happen from 10pm until 6am.

In considering when it is appropriate for a venue to operate with one member of staff Merkur Slots will primarily consider the security of the employees by reviewing customer levels, cash control needs and the activity within the local area such as licensed premises closing times.

Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.

Merkur Slots Sydenham will operate TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.

As such staff are based predominately on the venue floor and have very little need to work in a back area, any back-office work is planned when the venue is closed (cash collections) or where customer numbers are low and sufficient staff available.

Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TITO and GeWeTe management of cash within the venue.

Operating 24hrs removes the risk of venue staff opening and closing the venue. MERKUR operate a 'refresh period' in all 24hr venues that allows for any cash empties and refills to take place when the venues are closed to the public.

The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarm will be installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.

Venue and machine keys are secured in a time delay safe accessible only by Duty Management.

The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarm will be installed.

Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.

		<p>Alcohol and Drugs Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise. 'No Alcohol Allowed' signage on the door.</p> <p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p> <p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p>Money Lending Money lending is not tolerated within our premises.</p> <p>Suspicious of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p> <p>Late Night Operation Maglock systems are often made available for staff to deploy at any point in time to protect against crime or disorder and are always deployed during times of public houses closing.</p> <p>Dedicated Regional Night Managers are employed to support venues with security incidents.</p> <p>Area Manager's operate a late-night rota system to ensure the 'late night contact number' is monitored so venues always have an Operational Manager to call upon for support with any issues during late night operation.</p> <p>The premise and staff are protected by a Staffguard security system, Maglock where available and intruder alarms are installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.</p>
<p>Ensuring that gambling is conducted in a fair and open way</p>		<p>Gaming Machine and Supervision The premise operates under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p>

Bingo is available by means of Bingo tablets offering a range of Bingo products and Live calling. Bingo Tablets are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.

Customer Complaints

Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.

Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.

The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.

Complaints portal used to collate and manage responses.

4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.

Marketing

Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP, and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, opening times and promotional activity.

All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 76</p> <p>Other</p>	<p>Places of worship and Religious Buildings: Our Lady & St. Philip Neri RC Church, Sydenham, 208 Sydenham Rd, London SE26 5SE Parish Church of Saint Michael and All Angels, 1A Trewsbury Rd, London SE26 5DP All Saints Church, Trewsbury Rd, London SE26 5DP Ministère de la parole de la réconciliation, 141 Newlands Park, London SE26 5PP Forest Hill Community Church, 17 Sydenham Rd, London SE26 5EX Beneficial Veracious Christ Church, 3 Peak Hill Ave, SE26 4LG St Bartholomew's Church, 4 Westwood Hill, London SE26 6QR The Grove Centre Church, 2 Jews Walk, London SE26 6PL Church of the Resurrection of Our Lord (RC), 165-169 Kirkdale, London SE26 4QL St Philip The Apostle C Of E Church, 11 Coombe Rd, SE26 6QW Holy Trinity Church Sydenham and Forest Hill, Trinity Path, London SE26 4EA Kingdom Hall of Jehovah's Witnesses, 173 Venner Rd, SE26 5HX Citizenship in Christ Fellowship, Premier Centre, Kangley Bridge Rd, London SE26 5AQ Potters House Sydenham, Wesley Hall, 211-213 Sydenham Rd, London SE26 5HF</p>	<p>Ethnicity and Local Area Demographic Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p>Training & Social Responsibility Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors annually.</p>
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Merkur Slots Sydenham Premise Layout

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

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Additional Comments

During the pre-application process the police were consulted with and provided the following response:

'The area of Sydenham in general has and will continue with the ASB and problems with a high level of Off-Licences that have grandfather rights. There are many estates with youth crime and gang problems, along with Street drinkers and lower level crimes, like Theft/shoplifting.'


Merkur Slots has attained the prestigious Global Gaming Guidance Group (G4) accreditation for Responsible Gambling. This is only awarded after a rigorous audit of the company's safer gambling measures. Furthermore, ongoing accreditation requires reassessment every 18 months.

MERKUR Casino UK operate two premises within the London Borough of Lewisham: MERKUR Slots, 97-99 Lewisham High Street, London, SE13 6BA since 2012 and MERKUR Slots, 40 Deptford High Street, Deptford, London, SE8 4AF since 2021. None of our operational venues have been subject to review proceedings.

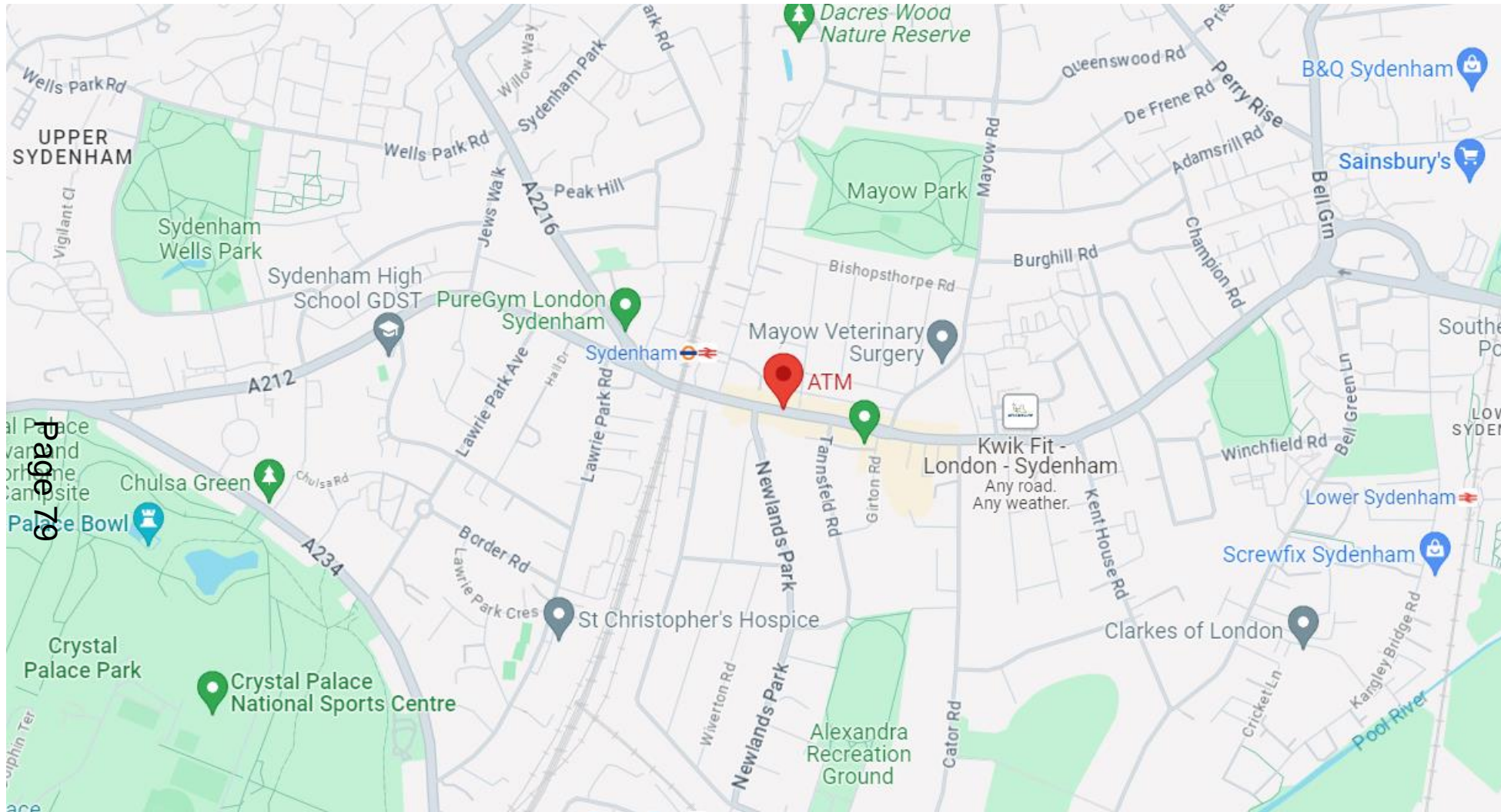
I am an IIA Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries. The last 11 years I have been working solely in the Gambling Industry (*Amanda Kiernan, Head of Compliance*).

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

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

Assessors Name:	Amanda Kiernan
Signature:	
Date:	28 th December 2023

Merkur Slots, 53 Sydenham Road, London, SE26 5EY – map:



Merkur Slots, 53 Sydenham Road, London, SE26 5EY – Shop frontage example:



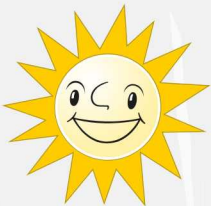
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WORKING TOGETHER



Accredited by the Global Gambling Guidance Group

Page 81 **THE MERKUR FAMILY**



PART OF THE GAUSELMANN GROUP

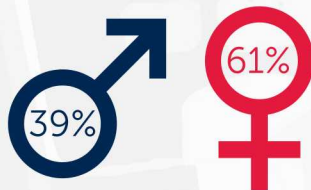
A Strong Partner For More Than 60 Years



**MERKUR
CASINO**

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

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



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



**MERKUR
SLOTS**

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



**MERKUR
BINGO**

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

HIGH STREET BINGO

What is it?

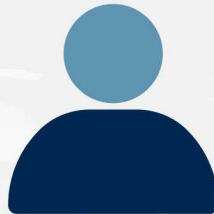
Bingo is one of the UK's favourite pastimes and Praesepe is one of the UK's largest operators of licensed bingo and arcade premises. Our High Street Bingo Venues:



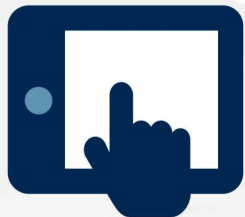
Offer more local, convenient locations to play Bingo rather than travelling to larger clubs.



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



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



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



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



Bingo is available for play from 9am until midnight.



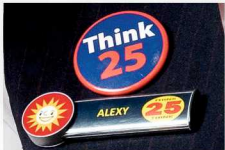
Bingo Terminals





RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

Think 25 Messaging



Players in Venue



We Are Not A Problem

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

GAMBLING COMMISSION

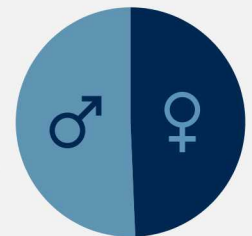
Merkur Casino is regulated by the Gambling Commission and Licensing Authorities



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



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



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



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



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

SOCIAL RESPONSIBILITY MEASURES IN PLACE



In Venue

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



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



Dedicated Learning & Development Team and National training centres.

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



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



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

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



Compliance



Training Centre



Online Training





SOCIAL RESPONSIBILITY MEASURES IN PLACE

Machine Messaging



Customer Interaction Training



All Levels

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



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



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



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

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



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

- Operations Director and Head of Compliance are
- Head of Compliance is a member of the Social Responsibility Committee.

BENEFITS TO THE HIGH STREET



Benefits for your High Street include:



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



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



Linked trips with other shops helping to support other businesses.



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



Increased footfall to the High Street.



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

COMMUNITY & CHARITY

Merkur Initiative

Supporting Local Charities and Good Causes

Amongst other charities, some of your donations have helped:



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

Please contact us

For press enquiries:

email martha@sourcemc.co.uk

phone +44 (0) 7796 614137

Merkur Casino UK

Seebeck House

1A Seebeck Place

Knowlhill

Milton Keynes

MK5 3FR

phone 01908 351200

email info@merkur-casino.com



Mandatory conditions

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

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

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

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

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

Default conditions

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

I, in the firm of Messrs, Poppleston Allen, Solicitors of 37 Stoney Street, The Lace Market, Nottingham, NG1 1LS refer to the following:-

1. Letter to London Borough of Lewisham Council
2. Application Form
3. Notice of Application served upon all the Responsible Authorities
4. A copy of the proposed premises plan
5. A copy of Merkur Slots UK Ltd's "Operational Standards" Document
6. A copy of Merkur Slots UK Ltd's "Working with Others" Documents

I FURTHER CERTIFY that I have served documents 1 - 6 upon the following:-

1. Licensing Authority, Crime, Enforcement and Regulation Service, London Borough of Lewisham Council, 9 Holbeach Road, Catford, SE6 4TW

I FURTHER CERTIFY that I have served a true copy of documents 1 & 3 upon the following:-

2. The Gambling Commission, Victoria Square House, Victoria Square, Birmingham, B2 4BP
3. HM Revenue & Customs, Excise Processing Team, BX9 1GL
4. Lynn Blakelock, Childrens Social Care, 1st Floor Laurence House, 1 Catford Road, London SE6 4RU
5. Fires Safety Regulation: South East 3, London Fire Brigade, 169 Union Street, London, SE1 0LL
6. Planning & Development Control, 3rd Floor Laurence House, 1 Catford Road, London, SE6 4RU
7. Environmental Health Enforcement Section, Wearside Service Centre, Wearside Road, London, SE13 7EZ
8. The Licensing Officer, Lewisham Police Station, 43 Lewisham High Street, London, SE13 5JZ

I effected service by sending the said documents to the licensing department by email and the other authorities by first class post addressed to them on 18th January 2024.

SIGNED.....

DATED.....10/1/24.....