



# AGENDA

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## LICENSING COMMITTEE

**Date: TUESDAY, 26 SEPTEMBER 2023 at 7.00 pm**

Remote - 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](mailto:clare.weaser@lewisham.gov.uk)**

### **MEMBERS**

This meeting is an open meeting and all items on the agenda may be audio recorded and/or filmed.

### **Councillors:**

Councillor Susan Wise (Chair)  
Councillor Yemisi Anifowose (Vice-Chair)  
Councillor Bill Brown  
Councillor Coral Howard  
Councillor Stephen Hayes  
Councillor Edison Huynh  
Councillor Mark Jackson  
Councillor Eva Kestner  
Councillor Liam Shrivastava  
Councillor Luke Warner

**Members are summoned to attend this meeting**

**Jeremy Chambers**  
Director of Law and Corporate Governance  
Laurence House  
Catford  
London SE6 4RU  
Date: 18 September 2023

## 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:** 26 September 2023

**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 meeting of the Licensing Committee, held on 6 September 2023**

#### Recommendation

That the Minutes of the meeting of the Licensing Committee, held on 6 September 2023 be confirmed and signed.

# Agenda Item 2



## Licensing Committee

### Declarations of Interest

**Date:** 26 September 2023

**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: Jenningsbet, 80-82 Deptford High Street, SE8 4RT**

**Date: 26 September 2023**

**Key decision: No.**

**Class: Part 1.**

**Ward(s) affected: Deptford**

**Contributors: Community Services – Safer Communities Service**

### Outline and recommendations

Determination of new premises licence application submitted by Betting Shop Operations Limited.

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 08<sup>th</sup> August 2023.

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

## 1. Summary

- 1.1. Betting Shop Operations Limited have applied for a new premises licence for the purposes of "Betting (Other)". This is betting that takes place other than at a track typically a betting shop.
- 1.2. The application was advertised in accordance with regulations (premises notice and the



Newspaper advert).

- 1.3. Eight 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
- 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. 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 Gambing 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 12<sup>th</sup> July 2023
- 9.2. Premises plan
- 9.3. Local Area Risk Assessment
- 9.4. Representations as served x 8
- 9.5. Licensing Authority Representation
- 9.6. Mandatory and Default conditions
- 9.7. Locality and surrounding premises information

## 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"><li>• preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,</li><li>• ensuring that gambling is conducted in a fair and open way, and</li><li>• protecting children and other vulnerable persons from being harmed or exploited by gambling.</li></ul>
Interested Person	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

### Is this report easy to understand?

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Term	Definition
Relevant Representation	A representation that is specific to the premises in question, related to the three licensing objectives
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"> <li>• LBL Children’s Services</li> <li>• The Gambling Commission</li> <li>• HM Revenue and Customers</li> <li>• LBL Licensing Authority</li> <li>• LBL Planning Authority</li> <li>• Environmental Protection (noise)</li> <li>• London Fire Brigade</li> </ul>

## 11. Report author and contact

11.1. Clare Chown – 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): [\*\*\*\*\*]

3 Applicant's address (home/business - ):

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Postcode: [\*\*\*\*\*]

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

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

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

### Section B

#### Application on Behalf of an organisation

6 Name of applicant business or organisation: Betting Shop Operations Limited

7. The applicant's registered or principal address:

4 Simon Champion Court, 232-234 High Street, Epping, Essex

Postcode: CM16 4AU

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

003224-N-332321-004

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give

the date on which the application was made: [\*\*\*\*\*]

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

### Part 3 – Premises Details

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

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

80-82 Deptford High Street, Deptford

Postcode: SE8 4RT

12 Telephone number at premises (if known): [\*\*\*\*\*]

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

The premises to be licensed is on a corner on a parade of shops which collectively form part of the commercial high street. An independent oriental food specialist is at the other side of the building with residential accommodation above.

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

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

[\*\*\*\*\*]



#### Part 4 – Times of Operation

15(a) Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? No

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

	Start	Finish	Details of any seasonal variation
Mon			[*****]
Tues			[*****]
Wed			[*****]
Thurs			[*****]
Fri			[*****]
Sat			[*****]
Sun			[*****]

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

[\*\*\*\*\*]

#### Part 5 - Miscellaneous

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

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:

GPL089 - 14 Deptford High Street, Deptford, SE8 4AF

GPL085 - 137 Lewisham High Street, London, SE13 6AA

GPL084 - 134 Rushey Green, Catford, SE6 4HQ

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

The applicant has held an Operating Licence since the Gambling Act 2005 came into force and has in place a whole range of policies and procedures which include (1) Jenningsbet Operating Strategy for the branch which will reference the following associated documents; (2) AML/CTF Risk Assessment (3) AML/CTF Policy (4) AML/CTF Procedures and Controls (Shops) (5) AML/CTF Procedures and Controls (Head Office) (6) Social Responsibility Gambling Policy (7) Customer Interaction Policy. If any responsible authority would like to see or discuss these policies then please contact [andrew@woodswhur.co.uk](mailto:andrew@woodswhur.co.uk)

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

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

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

Checklist:

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

#### Part 7 – Signatures

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

Signature:

*Woods Whur*

Print Name: Woods Whur

Date: 12 July 2023

Capacity: Solicitors for 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: (dd/mm/yyyy)

Capacity: [\*\*\*\*\*]

### Part 8 – Contact Details

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

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted: 0113 234 3055

24 Postal address for correspondence associated with this application:

Woods Whur

St James House

28 Park Place

Leeds

Postcode: LS1 2SP

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:

[andrew@woodswhur.co.uk](mailto:andrew@woodswhur.co.uk)

## NEW PREMISES LICENCE FOR JENNINGSBET 82 DEPTFORD HIGH STREET SE8 4RT

26 September 2023 at 7 PM

1. This is an application to be determined under section 153 Gambling Act 2005 and the relevant principles to be applied set out in that section '*in exercising their functions a licensing authority shall aim to permit...*'
2. There are currently three betting offices on Deptford High Street. Two are operated by Paddy Power and one by JenningsBet at 14 Deptford high Street. There are no Casinos.
3. They used to be seven betting offices on Deptford High Street issued under the Gambling Act 2005 but William Hill have closed two shops (38/40 and 206) Ladbrokes have closed one shop (48/50) and Coral have closed one shop (70). There has been a reduction in the number of betting offices number on Deptford High Street. Two of the closed shops have been replaced by Amusement Arcades.
4. JenningsBet at 14 Deptford high Street has not had any of the issues referred to in the eight representations.
5. There are no objections to this application from the Metropolitan police, licensing authority, public health or other authority and no evidence is put forward against the licensing objectives by any authority.
6. A full range of policies and procedures including a detailed operating strategy was submitted with this application and is submitted for this Licensing Committee Hearing.
7. The policies and procedures, training and operational strategy of Jennings at all times promote the licensing objectives and ensure that none of the concerns of those making representations relate to JenningsBet premises.

**Jenningbset – 80-82 Deptford High Street, SE8 4RT**

**Locality/Surrounding Premises**

80-82 Deptford High Street, SE8 4RT



Deptford High Street (Facing towards Evelyn Street)



## Deptford High Street (Facing towards New Cross Road)



### **Surrounding Gambling Premises**

- Paddy Power - 175 Deptford High Street
- Jenningsbet - 14 Deptford High Street
- Paddy Power - 52 Deptford High Street
- Game Nation - 70 Deptford High Street
- Merkur Slots - 38-40 Deptford High Street



## Local Area Risk Assessment

<b>Date of assessment:</b>	1 <sup>st</sup> July 2023.
<b>Review date:</b>	30 <sup>th</sup> June 2024 or before if any significant changes take place within the location.

<b>Shop Name:</b>	
<b>Premises Address:</b>	80-82 Deptford High Street, Deptford, London, SE8 4RT
<b>Name of Assessor:</b>	Sue Spencer & Peter Jowett
<b>Branch Manager:</b>	TBC
<b>Can shop single man and if so during what times?</b>	Yes 08:00-18:30

## 1. Local Area

The shop is in a main commercial high street parade of mainly retail stores, convenience stores, restaurants, coffee shops and takeaways. It is a mixed commercial and residential area and serves the local community

### Shop Banking Arrangements:

Address and Location to Shop:	Opening Times:
<p><b>Primary</b> Evelyn Street Post Office 301 Evelyn St, London SE8 5RA</p> <p><b>Secondary</b> Post Office, 500 New Cross Road, London, SE14 6TL</p>	<p><b>Mon – Fri 08:30-17:00</b> <b>Sat – 08:30-15:00</b> <b>Sun – Closed</b></p> <p><b>Mon – Fri 09:00-17:30</b> <b>Sat – 09:00-13:00</b> <b>Sun - Closed</b></p>

### Local Police Details:

Address and Location to Shop:	Opening Times:
<p><b>Lewisham Police Station,</b> <b>43 Lewisham High St,</b> <b>London,</b> <b>SE13 5JZ</b></p>	<p><b>Open 24 hours</b></p>



External Shop Details:		
<b>Access Routes to the Shop:</b>	The premises has one access route which leads to the front of the premises from the High Street, the premises faces onto a busy High Street. Parking is close by to the rear of the shop with Frankham Street providing both vehicular and pedestrian access	
<b>Passing Traffic:</b>	The premises are located on a busy High Street and serves local residents and visitors to the area. Passing traffic is restricted by a one way system.	
<b>Adjoining Properties:</b>	The premises is a corner property, an oriental food centre is to one side, a sight specialist is across the road to the other side.	
<b>Betwatch Scheme:</b>	None available that serve this locality	
Establishment type	Risk	Location and details
<b>Other gambling premises:</b>	Problem gamblers could self-exclude from other operators but still attempt to gamble in our premises	One of the largest national bookmakers, Paddy Power hold licences for premises in Deptford High Street and Evelyn Street. Jenningsbet hold Licences for premises in Deptford High Street and Evelyn Street. Merkur Slots have premises in Deptford High Street.
<b>Educational establishment:</b>	Increased presence of under 18 in local area. 6 <sup>th</sup> form colleges particularly give a higher risk of underage gambling	Tidemill Academy is 0.1km away Lewisham College is 0'3km away.
<b>Hospital or mental health facility:</b>	This could lead to an increased presence in the local area of vulnerable people	University College Hospital - Lewisham High St, SE13 6LH Speedwell Mental Health Centre - 62 Speedwell St, SE8 4AT Max Out Southwark - 3, Norman House, 110-114 Norman Rd, SE10 9QJ
<b>Job centre:</b>	This could lead to an increased presence in the local area of vulnerable people	Deptford High Street Job Centre is closed, the closest now being at Peckham Job Centre - 24-26 Peckham High St, SE15 5DS

<b>Pub, social club, club serving alcohol:</b>	This could lead to an increased presence in the local area of vulnerable people	Stocktons - 2 Deptford High St, LSE8 4AF Badger, Badger - 139, 145 Deptford High St, SE8 3NU The Bunker - 46 Deptford Broadway, London SE8 4PH Little Crown - 495 New Cross Rd, SE14 6TQ Star and Garter - 490 New Cross Rd, SE14 6TJ Royal Standard - 86 Tanner's Hill, SE8 4PN The Hatch Club - 23 Lewisham Way, SE14 6PP Aaja - The Snake Pit, 30 Deptford Church St, SE8 4RZ
<b>Off licences:</b>	This could lead to an increased presence in the local area of vulnerable people	There are several off licences and other convenience stores in the local vicinity that sell alcohol
<b>Specialised housing for vulnerable people:</b>	This could lead to an increased presence in the local area of vulnerable people	999 Club - 21 Deptford Broadway, London SE8 4PA
<b>Gambling addiction support facilities:</b>	This could lead to an increased presence in the local area of vulnerable people	The London Recovery Partnership - 14 B, 14 New King St, SE8 3HS Addiction Blasters - 87 Thornham St, SE10 9SB
<b>Alcohol or drug support facilities:</b>	This could lead to an increased presence in the local area of vulnerable people	The London Recovery Partnership - 14 B, 14 New King St, SE8 3HS Addiction Blasters - 87 Thornham St, SE10 9SB
<b>Hostels or support services for homeless:</b>	This could lead to an increased presence in the local area of vulnerable people	Centrepoint - 204 Evelyn St, SE8 5BZ Bench Outreach - 14 New King St, SE8 3HS St Mungo's Broadway - Exeter Way, SE14 6LL
<b>Pawn brokers or pay day loan businesses:</b>	This could lead to an increased presence in the local area of vulnerable people	H&T Pawnbrokers - 72 Deptford High St, SE8 4RT Cash Xchange - 184 Deptford High St, SE8 3PR

<b>Public Transport Hubs:</b>	Increased presence of under 18 in local area. Groups of young people gathering during evenings would heighten risk	The area is served by several local bus routes. Deptford Mainline station is 0.2km away. Deptford Bridge DLR station is 0.4km away.
<b>Others:</b>	This could lead to an increased presence in the local area of vulnerable people	We Care Food Bank - 50 Friendly St, SE8 4DR

## 2. The Gambling Operation

<p>Winter Trading Times (September to April)</p> <p>Monday to Friday: 09:00 to 22:00</p> <p>Saturday: 09:00 to 22:00</p> <p>Sunday: 10:00 to 22:00</p>	<p>Summer Trading Times (April to September)</p> <p>Monday to Friday: 09:00 to 22:00</p> <p>Saturday: 09:00 to 22:00</p> <p>Sunday: 10:00 to 22:00</p>
How many employees are based in this shop?	6
<p>How many employees are usually on duty at the specified times:</p> <p style="text-align: right;">Opening time to 12.30: 1</p> <p style="text-align: right;">12:30 to 18:30 2</p> <p style="text-align: right;">18:30 to closing time: 2</p>	
Does the company operate lone person working in this shop from 18:30	No
<p>What products does the premises provide for gambling:</p> <p style="text-align: right;">No. of tills to process over the counter bets in operation: 2</p> <p style="text-align: right;">No. of FOBTs in operation: 4</p> <p style="text-align: right;">No. of SSBT's in operation: 5</p>	
How is training provided to employees in the premises:	<p>All training is devised with the three licencing objectives at it's core. The Company's Training Manager provides face to face induction training to new employees before they take up a formal position. On site training further enhances their development over the first 8 weeks working alongside a suitable branch training manager. A new recruit to the business whether previously employed in the sector or not MUST undertake and pass a final examination before being allowed to manage a branch. Refresher training is undertaken on at least an annual basis via the Elearning portal. All training records are held at by the Compliance Team.</p>

Specific Control Measures	YES/NO	Location and details
<b>Safe:</b>	Yes	This will be free standing with a 2 minute time delay and a 10 minutes time delay for the insert.
<b>Time-Delay Insert:</b>	Yes	This will be 10 minutes.
<b>Additional Safe:</b>	No	
<b>Monitored Safe:</b>	No	
<b>Intruder Alarm:</b>	Yes	Alarm Monitored by Central Monitoring System
<b>CCTV:</b>	Yes	To be installed and will cover the customer area, the counter area, the machines area and a covert camera to cover persons leaving the premises to provide a head and shoulder image.
<b>Blind Spot Mirrors:</b>	No	All areas to be covered by the CCTV.
<b>Staff Guard:</b>	Yes	Staff Guard lanyards will be used in shop which the shop team wear upon themselves with full visibility to the customers.
<b>EGM/FOBT Blocking Facility:</b>	Yes	Blocking facility controlled and monitored by staff behind the counter.
<b>Security Screens:</b>	Yes	Full screen, counter to ceiling
<b>Counter Door Lock:</b>	Yes	Push button digital lock and further internally controlled lock/bolt To the rear of the counter area (see plan)
<b>Safe Haven:</b>	Yes	
<b>Toilet Door Maglock:</b>	Yes	Buzzer entry access only, controlled and monitored by staff behind the counter.
<b>UV Toilet Light:</b>	Yes	
<b>Front Door Maglock:</b>	Yes	An electric locking device will be installed and maintained on the main entrance/exit to the premises which will be operable by staff to restrict entry when required.
<b>Shutters:</b>	No	
<b>Steel Doors:</b>	No	
<b>External Lighting:</b>	No	None other than the public street lights
<b>Others:</b>	Yes	We operate a third-party security system called StaffGuard. This provides a live link to an off-site operator, Shop staff can also trigger assistance and request a call for police assistance if deemed necessary. If the StaffGuard facility is triggered due to criminal activity the audio and live pictures are recorded and used as evidence.

3. Licensing objectives			
Licensing Objective	Risks	Existing Control Measures	Further Controls Recommended
<p><b>Protecting children and other vulnerable persons from being harmed or exploited by gambling.</b></p>	<ul style="list-style-type: none"> <li>• Underage customers attempting to gamble on the premises.</li> <li>• Children accompanying adults onto the premises.</li> <li>• Enhanced number of children or young adults in vicinity before school, at lunchtimes and after school</li> <li>• Vulnerable people visiting the premises and gambling beyond their means or in an out-of-control manner. Vulnerable people could include (but not limited to) people with: <ul style="list-style-type: none"> <li>• Mental health conditions</li> <li>• Drug dependency</li> <li>• Alcohol dependency</li> <li>• Problem gamblers</li> <li>• Homelessness</li> <li>• Debt issues</li> </ul> </li> <li>• Persons that have identified as having potential or actual gambling problems have self-excluded from the premises or other betting shops locally but still attempt to enter the premises</li> </ul>	<ul style="list-style-type: none"> <li>• Think 21 policy in operation to aid identification of under 18's.</li> <li>• Serve legal test purchase scheme checks our adherence to this policy.</li> <li>• Zero tolerance on children being on the premises.</li> <li>• External advertising is not aimed at young people or use images likely to appeal to young people.</li> <li>• No alcohol policy on premises</li> <li>• Internal self-exclusion process in place</li> <li>• Internal self-exclusion process in place</li> <li>• We subscribe to the multi operator self-exclusion scheme (MOSES)</li> <li>• Safer Gambling material is available in a prominent position in the branch as per the GamCare land-based Code definition of prominent i.e visible at a 360-degree view anywhere in the branch where gambling can take place, in addition these materials are available in discreet locations such as</li> </ul>	<ul style="list-style-type: none"> <li>• Increased awareness of children attempting to enter the shop after 3pm</li> <li>• Increased awareness of customer behaviour. Refuse service to any customers who are not in control of themselves.</li> <li>• Jenningsbet provide extensive ongoing guidance and awareness training in this area, which includes off-site training, the use of distance learning and availability of reference materials on the staff portal.</li> <li>• JB are part of the Multi Operational Self Exclusion Scheme (MOSES) and will add this branch to the scheme before it opens. Those individuals who have excluded from our branches at 14 Deptford High Street and 240/242 Evelyn Street will also be excluded from this branch</li> <li>• Check self-exclusions at the start of every shift for new MOSES self-excluded customers.</li> <li>• Make sure any self-exclusion breaches are logged with support.</li> </ul>

	<ul style="list-style-type: none"><li>• Customers may show 'trigger' signs of developing a problem with gambling</li></ul>	<p>toilets. There are also materials by the exits to allow customers the option of 'discreet takeaway'.</p> <ul style="list-style-type: none"><li>• Staff are trained in spotting signs of problem gambling and responding with customer interactions encouraging customers to take a break from play when exhibiting signs of problem gambling.</li><li>• Relevant self-exclusion information and forms are available for customers and colleagues. Responsible gambling interactions (RGIs) are reported and recorded centrally; and trend reporting conducted on a regular basis by the Compliance Department.</li><li>• FOBT terminals have mandatory warnings in place for session time and spend. These pause the session for 30 seconds to allow the customer to take a break.</li><li>• FOBT terminals allow customers to voluntarily set limits for both time and spend, when reached the session is paused for 30 seconds to allow the customer to take a break.</li><li>• No FOBT advertising material to be placed in external windows.</li><li>• We adhere to the cross-industry Gambling Industry Code on Socially Responsible Advertising</li><li>• Responsible gambling messages are displayed on all external marketing material and also on FOBT terminals.</li><li>• All staff trained in these policies and refresher training takes place on an annual basis.</li></ul>	
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<p><b>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.</b></p>	<ul style="list-style-type: none"> <li>• Shop to be used for money laundering purposes, either through over the counter bets or on the terminals in the shop</li>   <li>• Gaming machines may allow 'dyed notes' for credit.</li>   <li>• Premises may be used by drug dealers.</li>   <li>• Vulnerable people may fund their betting through crime e.g., shoplifting.</li>   <li>• Visitors to the shop may attempt to sell stolen goods to customers.</li>   <li>• Robbery</li> </ul>	<ul style="list-style-type: none"> <li>• Company policies and procedures in place to operate in accordance with the Proceeds of Crime Act 2002 (POCA) to mitigate against Money Laundering and Terrorist Financing. These are independently audited at a minimum of yearly to ensure compliance.</li>   <li>• Jenningsbet Money Laundering Reporting Officer (MLRO) is Peter Jowett. There is a clear escalation and reporting process in respect of all products. The MLRO monitors staking patterns for KYC purposes.</li>   <li>• Terminals raise alert if suspicious pattern of play. All instances reported via the online reporting system to the MLRO.</li>   <li>• Staff trained to report suspicions to MLRO.</li>   <li>• Staff trained to report any instances of dyed notes in terminals to MLRO and the security department.</li>   <li>• We have zero tolerance on drugs on the premises and a drug policy in place. Any suspicions will be reported to the police.</li>   <li>• Staff trained to not allow any goods to be sold on the premises.</li>   <li>• Shop is fitted with the following security measures: <ul style="list-style-type: none"> <li>• CCTV</li> <li>• StaffGuard monitoring system.</li> <li>• Remote operated magnetic lock</li> <li>• Time delayed safe.</li> </ul> </li>   <li>• Staff receive training on dealing with robberies and serious incidents. Further information can be found in our security handbook.</li> </ul>	<ul style="list-style-type: none"> <li>• Jenningsbet provide extensive ongoing guidance and awareness training in this area, which includes off-site training, the use of distance learning and availability of reference materials on the staff portal.</li>   <li>• Staff to be vigilant to local crime levels and instances. Crimes local to the branch should be reported to senior management as appropriate.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Anti-Social Behaviour</li> <li>• Conflict Management</li>   <li>• Subject to customer fraud</li>   <li>• Subject to staff fraud</li>   <li>• Alcohol</li>   <li>• Drug Misuse</li>   <li>• Begging and Money Lending</li> </ul>	<ul style="list-style-type: none"> <li>• Systems to mitigate potential risk of conflicts include:             <ul style="list-style-type: none"> <li>• Staff Guard (monitored two-way audio and video support)</li> <li>• Central operational control team</li> <li>• Security Department with video support</li> <li>• Suitability of lone person working assessed on a shop-to-shop basis.</li> </ul> </li>   <li>• Staff are trained in identifying and preventing attempted customer fraud. Images of known offenders are circulated regularly to shop.</li>   <li>• Security department monitor transactions in shop to identify and prevent staff fraud.</li>   <li>• Customers may not bring onto the premises any intoxicating liquor for consumption on the premises. Sale or resale of any item is strictly forbidden. Staff are trained in removing any customer consuming alcohol with the assistance of staff guard.</li>   <li>• Staff are trained in the definitive escalation process for reporting suspected drug problems, which include informing the Security department and other relevant Operations Managers.</li>   <li>• Staff are trained to treat all customers with dignity and respect, where appropriate, known street beggars are refused service.</li>   <li>• Suspicions of organised money lending will be escalated to the security department and onwards to local authority investigation teams.</li>   <li>• Jenningsbet operate a zero-tolerance approach to all criminal activity, there are comprehensive reporting processes to escalate, record and ensure action is taken in respect of exceptional incidents. We have full CCTV installed to cover all areas and the facility to record and store footage.</li> </ul>	
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<p><b>Ensuring that gambling is conducted in a fair and open way.</b></p>	<ul style="list-style-type: none"> <li>• Customer disputes and Complaints</li> <li>• Customers may not be aware of who to make a complaint to</li> <li>• Unusual betting patterns may lead to the integrity of events being questioned.</li> <li>• Data Protection- GDPR</li> <li>• Gaming machine's chance and Randomness.</li> </ul>	<ul style="list-style-type: none"> <li>• The law states that bets are contracts and, therefore legally enforceable. The independent Betting Adjudication Service (IBAS) acts as an impartial adjudicator on disputes that arise between operator and customers.</li> <li>• Bets are settled by Jenningsbet Rules, which are displayed in a prominent position in every Jenningsbet branch.</li> <li>• Any changes to rules are communicated to customers by way of customer notice in advance of any changes coming into effect.</li> <li>• Terms and Conditions of any in shop promotions will be available for customers.</li> <li>• Complaints leaflets are available in store in prominent location.</li> <li>• To ensure disputes are dealt with efficiently managers may make discretionary payments to defined thresholds based on seniority. Jenningsbet will process gestures of goodwill were applicable.</li> <li>• We receive information about unusual betting patterns or suspicious betting from the Gambling Commission, either directly or via the BGC</li> <li>• Jenningsbet GDPR policy is available upon request included within that information is our policy concerning our CCTV.</li> <li>• Staff are trained on Return to Player Ratios (RTP) and where these are located on the FOBTs in order to inform customers about each games chance and randomness.</li> </ul>	<p>Colleagues receive on-going training to verify the accuracy of bets at the point of acceptance and to resolve issues with customers where possible, along with refresher training on discretionary payments.</p>
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#### 4. Gambling Operation & Physical Design (Internal and External)

Licensing Objective	Risks	Existing Control Measures	Further Controls Recommended
<p><b>Protecting children and other vulnerable persons from being harmed or exploited by gambling.</b></p>	<ul style="list-style-type: none"> <li>• Underage customers could enter the premises unseen and gamble on a FOBT or a SSBT</li> <li>• Self-excluded customer could enter the premises unseen and gamble on a FOBT or SSBT</li> <li>• Problem gamblers may not have access to responsible gambling literature.</li> <li>• Vulnerable people able to see into the premises and having sight of gambling activity.</li> </ul>	<ul style="list-style-type: none"> <li>• The entrance has a direct line of sight from the counter and is covered by CCTV.</li> <li>• All FOBT and SSBT's can be seen directly from the counter position and are covered by our CCTV.</li> <li>• FOBT's have the facility to be blocked immediately by staff from behind the counter if required.</li> <li>• Responsible gambling posters and leaflets are available next to the FOBT's.</li> <li>• Safer Gambling material is available in a prominent position in the branch as per the GamCare land-based Code definition of prominent i.e visible at a 360-degree view anywhere in the branch where gambling can take place, in addition these materials are available in discreet locations such as toilets. There are also materials by the exits to allow customers the option of 'discreet takeaway'.</li> <li>• Self-exclusion leaflets are available in multiple positions on the premises.</li> <li>• This branch has a restricted view from the shop front proving privacy for customers and creating difficulty for vulnerable persons to see the gambling activity.</li> </ul>	

<p><b>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.</b></p>	<ul style="list-style-type: none"> <li>• Blind spots in shop / toilets being used to carry out illegal activity.</li> <li>• Premises and equipment being damaged by customers.</li> <li>• The use of stolen debit cards as payment for bets</li> <li>• Shop being targeted for burglary out of hours.</li> <li>• Jenningsbet are aware of instances a few years ago when the william Hill shop (now closed) was targeted for "follow" robberies.</li> </ul>	<ul style="list-style-type: none"> <li>• Entrance to the toilet is in clear view of the counter or and entry is controlled by staff.</li> <li>• There are no blind spots on the premises.</li> <li>• Staff are trained in identifying signs of problem gambling and having meaningful customer interaction.</li> <li>• All card transactions over £100 requires PIN.</li> <li>• Any bet / terminal credit that is paid by card has returns paid back to the same card.</li> <li>• Names on card are checked to ensure it belongs to the customer i.e.a male name.</li> <li>• Alarm system in place for out of hours</li> <li>• Jenningsbet at 14 Deptford High Street had no instances of this crime or attempted crime</li> </ul>	<p>Staff to be vigilant to local crime levels and instances. Crimes local to the branch should be reported to senior management as appropriate. Information to be shared between local branches at 14 Deptford High Street and 240/242 Evelyn Street.</p> <p>Jenningsbet staff to remain vigilant and adhere to company policy when carrying out banking process.</p>
<p><b>Ensuring that gambling is conducted in a fair and open way.</b></p>	<ul style="list-style-type: none"> <li>• Customers may be mis-led by unclear offers.</li> <li>• Customers may not be aware of who to make a complaint to</li> <li>• Advertising may mis-lead customers</li> </ul>	<ul style="list-style-type: none"> <li>• Our rules are clearly displayed in shop.</li> <li>• Any changes to rules are communicated to customers by way of customer notice in advance of any changes coming into effect.</li> <li>• Terms and Conditions of any in shop promotions will be available for customers.</li> <li>• Complaints leaflets are available in store in prominent location.</li> <li>• All marketing of gambling products and services is undertaken in a socially responsible manner.</li> <li>• Jenningsbet comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP)</li> </ul>	

**Security incidents (including any robberies or attempted robberies/follow offs in area (all outlets not just betting shops) including/own branch in the last 12 months and any incidents of DSM/fake notes)**

Date	Type	Summary
July 2023	N/A	None Known

**Compliance Incidents (including any self-exclusion breaches or attempted breaches in the last 12 months)**

Date	Type	Summary
July 2023	New Licence Application	Since May 1 <sup>st</sup> 2022 1 customer has breached his Self Exclusion between our two existing shops at 14 Deptford High Street and 240/242 Evelyn Street. 2 other customers attempted to breach but were unsuccessful.

**5.Action Plan**

Question	Action Required	By Whom (name)	By When (date)	Date Completed

**6.Assessment Review**

Frequency of Review (Enter time period e.g., 12 months)	12 months	Date Review Due	30 June 2024
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Completed Risk Assessment brought to the attention of:

Name	Position	Signature	Date this assessment was brought to

			<b>this persons attention</b>
	Branch Manager		

<b>Local Risk Profile – 80-82 Deptford High Street, Deptford, London, SE8 4RT.</b>	
<b>Local Authority:</b>	<b>London Borough of Lewisham</b>
<b>Potential Licensing Risk Factors:</b>	<b>None other than those identified within the LCCP, Gambling Act and the Local Authorities Statement of Principles for Gambling</b>

Demographic:

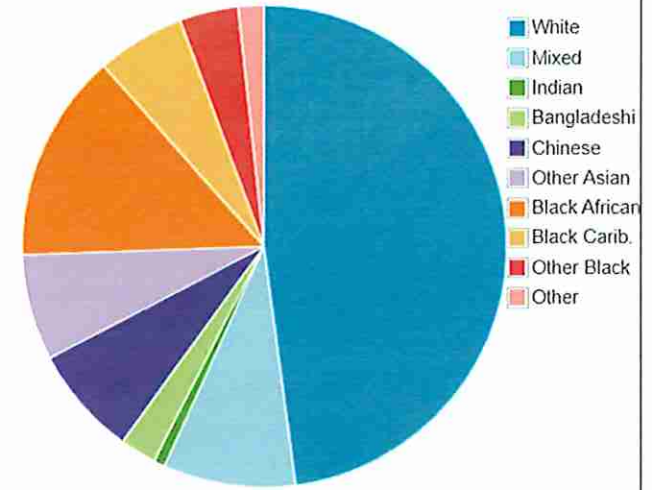
Deptford High Street, London can be considered more ethnically diverse than the UK average. As whole, the UK population claims itself as approximately 86% white, with residents of this area being 48% so.

As a country with a diverse population, the UK is home to other sizable ethnic groups, with mixed ethnicity (2.1%), Indian (2.4%) and Pakistani (1.9%) being the largest groups reported.

There is considerable division of ethnicities within the UK, with ethnically diverse addresses uncommon outside of urban areas.

**Ethnic Group**

White	195
Mixed Ethnicity	36
Indian	3
Bangladeshi	10
Chinese	30
Other Asian	29
Black African	57
Black Caribbean	24
Other Black/African/Caribbean	16
Other	7

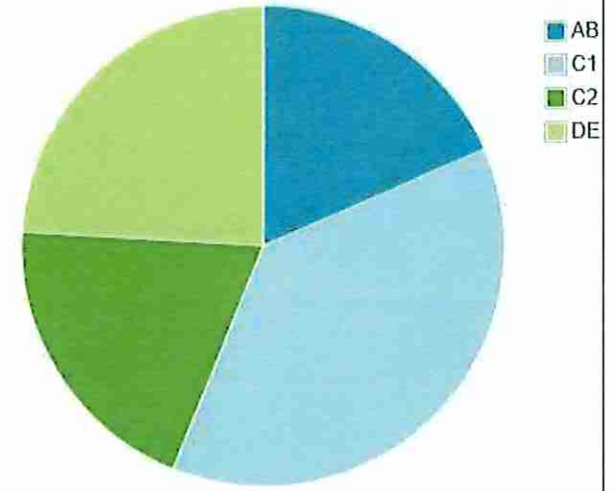


Deptford High Street, London can be considered more ethnically diverse than the UK average. As whole, the UK population claims itself as approximately 86% white, with residents of this area being 48% so.



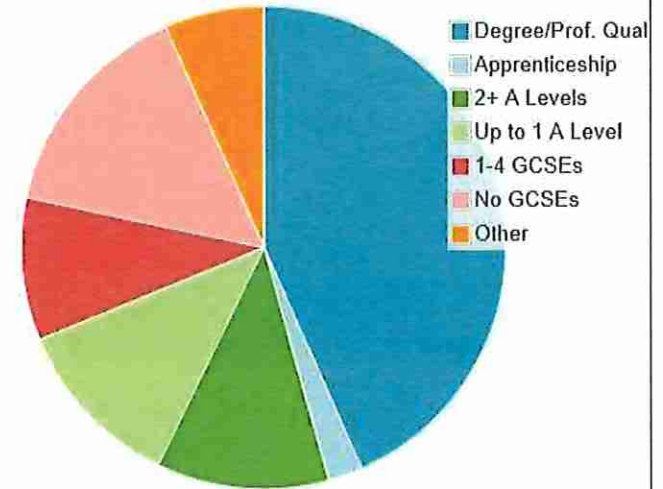
**Social Grade**

AB - Higher and intermediate managerial, administrative, or professional positions	39
C1 - Supervisory, clerical, and junior managerial/administrative/professional positions	80
C2 - Skilled manual workers	42
DE - Semi-skilled and unskilled manual workers; those on state benefit/unemployed, & lowest grade workers	51
<b>Total</b>	<b>212</b>



**Highest Qualification Level Achieved**

Degree or Similar <i>e.g. professional qualification (accountancy etc)</i>	150
Apprenticeship	8
2+ A Levels	40
5+ GCSEs, an A-Level or 1-2 AS Levels	40
1-4 GCSEs	33
No GCSEs	52
Other	23
<b>Total</b>	<b>346</b>



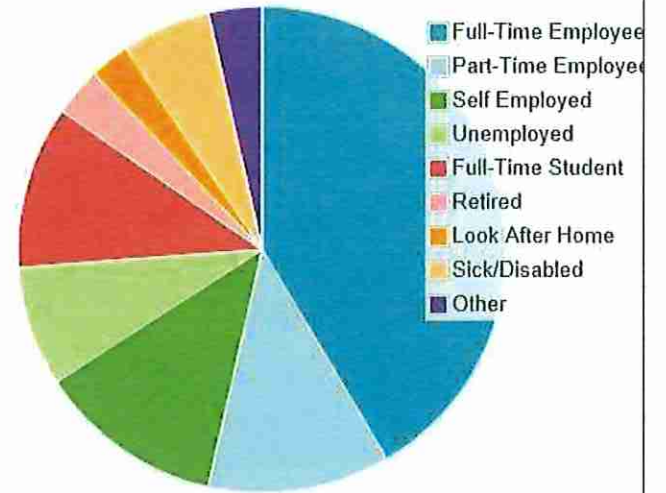
**Deprivation Quintile:**

2- This LBO is located in an area that is ranked in the 2nd decile of the national Index of Multiple Deprivation (IMD) for England, where 1 denotes the most deprived 10% of areas in the nation and 10 the least.

Employment:

**Economic Activity**

Full-Time Employee	<b>141</b>
Part-Time Employee <i>(defined as 30 hours or less per week)</i>	<b>41</b>
Self Employed	<b>42</b>
Unemployed	<b>27</b>
Full-Time Student <i>(with or without job)</i>	<b>37</b>
Retired	<b>11</b>
Looking After Home or Family	<b>9</b>
Long-Term Sick or Disabled	<b>20</b>
Other	<b>12</b>
<b>Total</b>	<b>340</b>



**Additional Associated Information**

**CCTV Camera Views:**

To be added

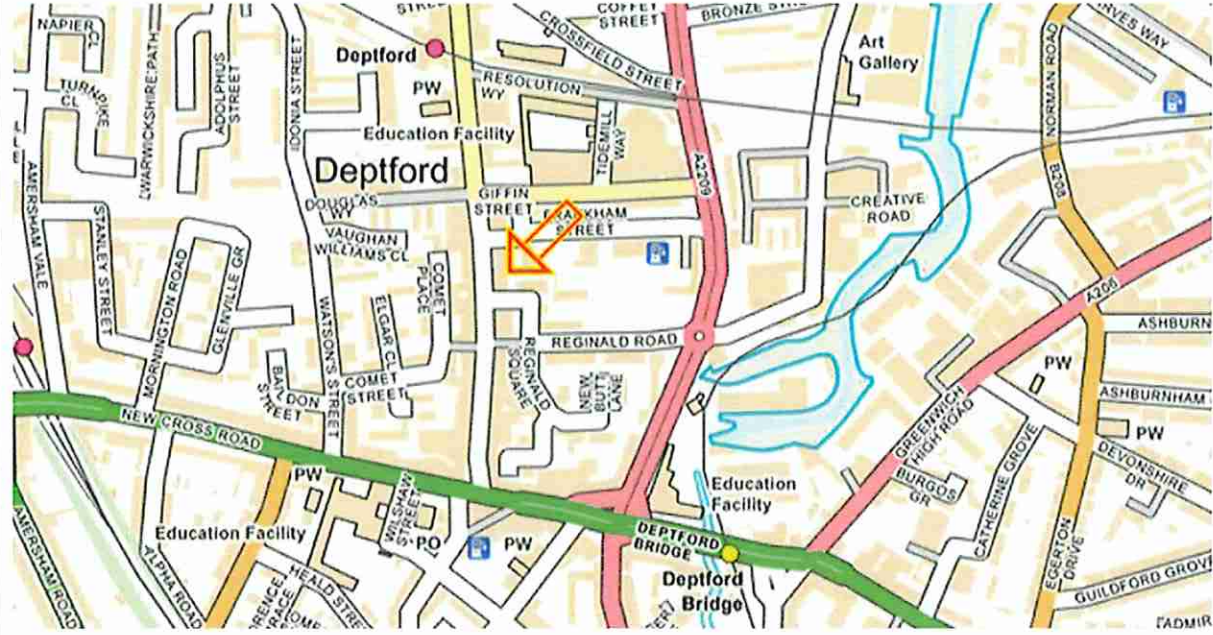
See appendices.

Shop Floor Plan:

Shop Front View:



Street Plan:



Other:

Site Attributes			
Shop Level:	Ground Floor	No. of Entrances:	1
Shape:	Rectangle	Entrance Detail:	To the front of the branch
Size:	Medium	Additional Egress:	None
Counter Position:	To the rear of the shop floor with full sight of the entrance door and machines	Machine Positions:	FOBTs close to the counter on the left hand wall as you enter the premises, SSBTs located on the same wall slightly further from the counter
Hidden Areas :	None	Welfare Facilities :	Staff will have a staff room, kitchen and 2 separate WC.
Miscellaneous:	Bleep activation every time the entrance door is opened and closed. Raises awareness to the shop team of whom is entering the premises.	DVR Located:	Behind the counter

CCTV - COMPLETED BY COMPLIANCE DEPT			
Internal cameras:	There will be approximately 8 internal cameras within the customer area, one will be covert and capture a head & shoulders image of everyone leaving the premises	External Cameras:	1 to capture the external front of the branch
Employee Monitors:	1	Employee Monitor:	Same monitor that provides live images of the shop floor
Public Monitor:	0	Public Monitor:	0
Type of DVR:	Hard drive, accessed via internet for live viewing and further recording by security teams	Type of DVR:	Hard drive, accessed via internet for live viewing and further recording by security teams

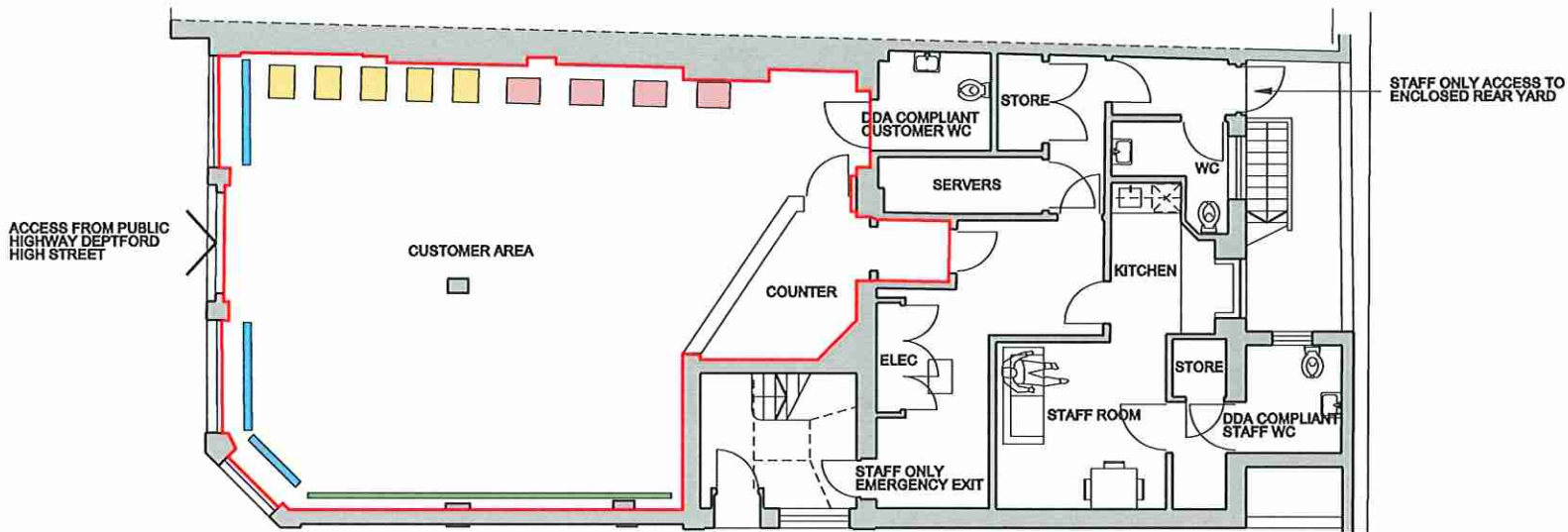
LBO Specific Licence Conditions COMPLETED BY COMPLIANCE DEPT	
Licence Conditions	Remarks
TBC	



ALL DIMENSIONS TO BE CHECKED ON SITE.  
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KEY

- GAMING AREA TO BE LICENCED
- SSBT's
- EGM's (FOBT'S)
- TV BANK
- DIGITAL DISPLAY SCREEN



GROUND FLOOR

REVISIONS			
SCALE	DATE	DRAWN	CHECKED
1:100	14.06.23	SD	SD

PROJECT  
**JENNINGSBET**  
 80-82 DEPTFORD HIGH ST.  
 LONDON SE8 4RT  
 DRAWING  
**PREMISE LICENCE PLAN**

Trinity House, Church Road, Tonbridge Wells TN11 1AG  
 +44 (0) 207 205 4994 info@zadarchitects.com

**zda** Zuber  
 Dobson  
 Architects

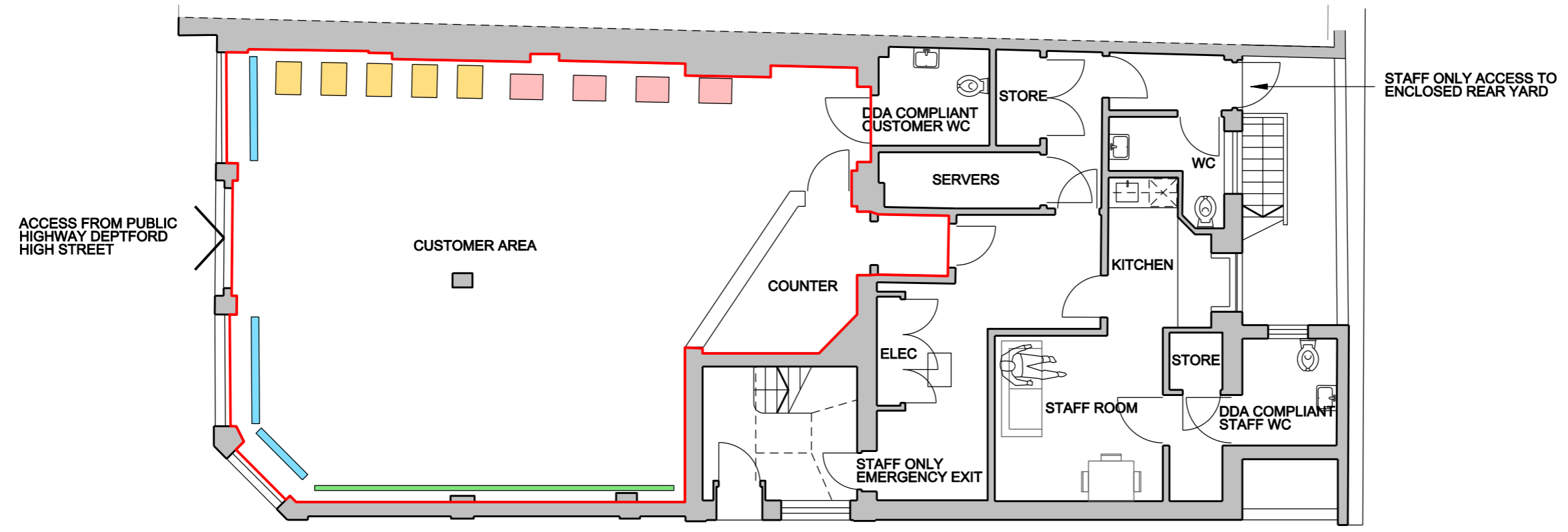
DRAWING No. **22020-L-001** REV



ALL DIMENSIONS TO BE CHECKED ON SITE.  
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- KEY**
- GAMING AREA TO BE LICENCED
  - SSBT's
  - EGM's (FOBT'S)
  - TV BANK
  - DIGITAL DISPLAY SCREEN

Page 48



GROUND FLOOR

**REVISIONS**

SCALE	DATE	DRAWN	CHECKED
1:100	14.06.23	SD	SD

**PROJECT**  
**JENNINGSBET**  
 80-82 DEPTFORD HIGH ST.  
 LONDON SE8 4RT

**DRAWING**  
 PREMISE LICENCE PLAN

Trinity House, Church Road, Tunbridge Wells TN1 1AG  
 +44 (0) 207 205 4994 info@zdarchitects.com



**DRAWING No.**  
 22020-L-001

Afternoon Clare

Re: Jenningsbet 80 – 82 Deptford High Street SE8

As the Responsible authority for this application, I would like to advise I have no objection to make.

Having read the application and all the supporting documents I feel the operator of this licence has covered everything required under the Gambling Act 2005.

The operator of this proposed premises licence has 3 premises in the borough and we have no issues to report with any of them.

Along with the risk assessment, procedures and controls (shops), social responsibility and customer interaction policies the licence will have the following mandatory and default conditions added:

**Mandatory conditions attaching to betting premises licences**

1. A notice stating that no person under the age of 18 years is permitted to enter the premises shall be displayed in a prominent place at every entrance to the premises.
2. (1) Access to the premises shall be from a street or from other premises with a betting premises licence.  
(2) Without prejudice to sub-paragraph (1), there shall be no means of direct access between the premises and other premises used for the retail sale of merchandise or services.
3. Subject to anything permitted by virtue of the 2005 Act, or done in accordance with paragraphs 4, 5, 6 and 7 below, the premises shall not be used for any purpose other than for providing facilities for betting.
4. 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 leave any gaming machine or betting machine in order to do so.
5. No apparatus for making information or other material available in the form of sounds or visual images may be used on the premises, except for apparatus used for the following purposes—
  - (a) communicating information about, or coverage of, sporting events, including—
    - (i) information relating to betting on such an event; and

- (ii) any other matter or information, including an advertisement, which is incidental to such an event;
  - (b) communicating information relating to betting on any event (including the result of the event) in connection with which betting transactions may be or have been effected on the premises.
- 6. No publications, other than racing periodicals or specialist betting publications, may be sold or offered for sale on the premises.
- 7. No music, dancing or other entertainment shall be provided or permitted on the premises, save for entertainment provided in accordance with paragraph 5.
- 8. (1) No alcohol shall be permitted to be consumed on the premises at any time during which facilities for gambling are being provided on the premises.  
  
(2) A notice stating the condition in sub-paragraph (1) shall be displayed in a prominent place at every entrance to the premises.
- 9. A notice setting out the terms on which customers are invited to bet on the premises shall be displayed in a prominent place on the premises to which customers have unrestricted access.

**Default conditions attaching to betting premises licences (other than in respect of tracks)**

- 1. No facilities for gambling shall be provided on the premises between the hours of 10pm on one day and 7am on the next day.

Regards

Angela Mullin-Murrell  
Safer Communities Officer (Licensing Team)  
Safer Communities Service  
Community Services  
Lewisham Council

**Jenningsbet – 80-82 Deptford High Street, SE8 4RT**

**Mandatory & Default Conditions**

**Mandatory conditions attaching to betting premises licences**

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  - (a) communicating information about, or coverage of, sporting events, including—
    - (i) information relating to betting on such an event; and
    - (ii) any other matter or information, including an advertisement, which is incidental to such an event;
  - (b) communicating information relating to betting on any event (including the result of the event) in connection with which betting transactions may be or have been effected on the premises.

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9. A notice setting out the terms on which customers are invited to bet on the premises shall be displayed in a prominent place on the premises to which customers have unrestricted access.

**Default conditions attaching to betting premises licences (other than in respect of tracks)**

1. No facilities for gambling shall be provided on the premises between the hours of 10pm on one day and 7am on the next day.

## **Objection 1**

**Subject: Strong Objection to Betting Company's Gambling License Application for Deptford High Street**

Dear Sir/Madam,

I am writing to emphatically express my strong objection to the application made by the Betting Shop Operations Limited for a gambling license to open another betting shop in Deptford High Street. As a concerned resident, I firmly believe that allowing yet another betting shop in our local community would have serious consequences on various aspects of our neighbourhood, including socio-economic well-being, public safety, and the welfare of our school-going children.

### Socio-economic Reasons:

Deptford High Street is already grappling with an over-concentration of betting shops, which has the potential to exacerbate socio-economic challenges in our community. As highlighted by reputable sources like the Institute for Public Policy Research (IPPR), such clustering of betting establishments is linked to higher levels of deprivation and negative socio-economic outcomes. The addition of another betting shop could further strain already vulnerable households and impact the overall economic health of the area.

### Negative Aspects of Gambling:

The detrimental impacts of gambling, particularly in areas with numerous betting shops, cannot be ignored. Extensive research conducted by the Gambling Commission demonstrates that high concentrations of betting establishments are associated with an increased risk of problem gambling and its associated adverse effects. This includes financial hardships, mental health issues, and strained relationships. The well-being of individuals and families in our community is at risk if we allow further proliferation of betting shops.

### Impact on Local Community and Residents:

The presence of multiple betting shops on Deptford High Street poses significant concerns for the safety and security of our community. Studies by the Local Government Association indicate that areas with high numbers of betting shops may experience an increase in anti-social behaviours, including loitering, street disturbances, and an escalation in petty crime. These factors could potentially deter potential investors, negatively impacting the attractiveness of our high street to visitors and residents alike. An evidence of this type of activity can be seen on the Deptford Crime Map that is issued by Metropolitan police (<https://www.met.police.uk/area/your-area/met/lewisham/deptford/about-us/crime-map>) where we can see the majority of antisocial behaviour and shoplifting on or near the high street.

### Proximity to Primary Schools:

Adding another betting shop in such close proximity to two primary schools raises serious concerns about the well-being of our children. Research shows that the exposure of young people to gambling environments, especially at an impressionable age, can normalize the behaviour and potentially lead to harmful consequences. We must prioritize the safety and welfare of our school-going children by creating a wholesome environment that shields them from exposure to gambling establishments.

### Incidents Involving Betting Shops in Deptford High Street:

While I do not have direct access to current police records, I urge the Safer Communities Service to conduct a thorough examination of the police reports to fully comprehend the

potential impact that granting this license might have on public safety and law enforcement resources.

#### London Living Wage

The prospective proprietor does not pay its staff the London Living Wage. This directly contradicts Lewisham's stance on ensuring businesses within its constituency provide appropriate wages to their staff. This feels ever more important given the current cost of living crisis.

#### London Objectives

The Mayor of London has recognized the damaging effect of gambling on London's residents. Gambling shops negatively affect those most vulnerable. He has made a pledge to remove gambling adverts from the TfL network. Through supporting another betting shop in Deptford High St, Lewisham is directly supporting gambling and the negative effects this has on their residents who frequent these shops. As a Labour borough, supporting new betting shops on an already saturated high street contradicts Labour Objectives.

Furthermore adding an additional betting shop to an already saturated high st directly contradicts the

London Plan 2021 which advises that a high concentration of betting shops does not serve the local community or support a vibrant and diverse high street with services for all as stated 'It is important that boroughs plan positively to meet the needs of their communities'. Allowing further betting shops on Deptford High St would be in direct opposition to the London Plan 2021 and the evidence from the Healthy Town Centres study 2017.

In light of these compelling reasons, I implore the Safer Communities Service to carefully consider the implications of granting a gambling license to the Betting Company. Instead, I request the Council to prioritize the safety, well-being, and prosperity of our community by supporting diverse and sustainable businesses that contribute positively to our neighbourhood.

I trust that the Safer Communities Service will give serious consideration to this objection, which echoes the collective concerns of our community. We strive to maintain Deptford High Street as a vibrant, family-friendly, and safe place that can be enjoyed by all residents and visitors. Together, let us work towards fostering an environment that reflects the best interests and values of our community.

Thank you for your attention to this matter. I anticipate a thorough review of this objection and your commitment to safeguarding our community's interests.

Kind regards



## **Objection 2**

1st August 2023

### **Subject: Strong Objection to Betting Company's Gambling Licence Application for Deptford High Street - Jenningsbet, 80-82 Deptford High Street, SE8 4RT**

Dear Sir/Madam,

I am writing to emphatically express my strong objection to the application made by the Betting Shop Operations Limited for a gambling licence to open another betting shop in Deptford High Street. As a concerned resident, I firmly believe that allowing yet another betting shop in our local community would have serious consequences on various aspects of our neighbourhood, including socio-economic well-being, public safety, and the welfare of our school-going children.

**Socio-economic Reasons:**

Deptford High Street is already grappling with an over-concentration of betting shops, which has the potential to exacerbate socio-economic challenges in our community. As highlighted by reputable sources like the Institute for Public Policy Research (IPPR), such clustering of betting establishments is linked to higher levels of deprivation and negative socio-economic outcomes. The addition of another betting shop could further strain already vulnerable households and impact the overall economic health of the area.

#### **Negative Aspects of Gambling:**

The detrimental impacts of gambling, particularly in areas with numerous betting shops, cannot be ignored. Extensive research conducted by the Gambling Commission demonstrates that high concentrations of betting establishments are associated with an increased risk of problem gambling and its associated adverse effects. This includes financial hardships, mental health issues, and strained relationships. The well-being of individuals and families in our community is at risk if we allow further proliferation of betting shops.

#### **Impact on Local Community and Residents:**

The presence of multiple betting shops in Deptford High Street poses significant concerns for the safety and security of our community. Studies by the Local Government Association indicate that areas with high numbers of betting shops may experience an increase in anti-social behaviours, including loitering, street disturbances, and an escalation in petty crime. These factors could potentially deter potential investors, negatively impacting the attractiveness of our high street to visitors and residents alike. An evidence of this type of activity can be seen on the Deptford Crime Map that is issued by Metropolitan police (<https://www.met.police.uk/area/your-area/met/lewisham/deptford/about-us/crime-map>) where we can see the majority of antisocial behaviour and shoplifting on or near the high street.

#### **Proximity to Primary Schools:**

Adding another betting shop in such close proximity to two primary schools raises serious concerns about the well-being of our children. Research shows that the exposure of young people to gambling environments, especially at an impressionable age, can normalise the behaviour and potentially lead to harmful consequences. We must prioritise the safety and welfare of our school-going children by creating a wholesome environment that shields them from exposure to gambling establishments.

**Incidents Involving Betting Shops in Deptford High Street:**

While I do not have direct access to current police records, I urge the Safer Communities Service to conduct a thorough examination of the police reports to fully comprehend the potential impact that granting this licence might have on public safety and law enforcement resources.

In light of these compelling reasons, I implore the Safer Communities Service to carefully consider the implications of granting a gambling licence to the Betting Company. Instead, I request the Council to prioritise the safety, well-being, and prosperity of our community by supporting diverse and sustainable businesses that contribute positively to our neighbourhood.

I trust that the Safer Communities Service will give serious consideration to this objection, which echoes the collective concerns of our community. We strive to maintain Deptford High Street as a vibrant, family-friendly, and safe place for all residents and visitors. Together, let us work towards fostering an environment that reflects the best interests and values of our community.

Thank you for your attention to this matter. I anticipate a thorough review of this objection and your commitment to safeguarding our community's interests.

In addition to my objection as a resident I am also making an objection as the Director of \*\*\*\*\*

In March 2023 I secured two funds from Lewisham Local for Food Justice Community grant of £6000 each. This is to deal with the immediate effects of food poverty. These funds were secured for Evelyn Community Store and the Salvation Army both running established weekly food banks less than 150 metres from 80 - 82 Deptford High Street.

It is incongruous that a council which is supporting and authored a Food Justice Action Plan [Lewisham Council - Food justice action plan](#) and invested funds with local organisations to combat food poverty can, at the same time support the licence of another betting shop within metres of two established food banks.

In June 2023 I secured £26,000 of emergency funding from MOPAC to support Violence against women and girls - some of this fund will directly support local residents of Deptford via support structures at the 999 Club, Lewisham Refugee and Migrant Service, Evelyn Community Store, Salvation Army and patients of The Waldron Centre - all within 200 m of 80 - 82 Deptford High Street.

Gambling as evidenced in the local resident objection below only fuels poverty and domestic abuse. I urge the council to consider how it can fund interventions on the doorstep of 80 - 82 Deptford High Street that combat poverty with one hand and with the other hand approve the gambling licence which will increase both poverty and domestic abuse.

I have secured £38,000 in a very difficult funding landscape to improve the lives of Deptford residents - it is not possible that another betting shop will do the same for the residents and will be counterproductive to the work that can be achieved with the £38,000.

Lastly Jenningsbet does not pay the London Living Wage - Lewisham's strategy is that all employers pay the LLW so approving this licence will not offer quality employment opportunities at the LLW to any future employees of this venue.

I am writing to emphatically express my strong objection to the application made by the Betting Shop Operations Limited for a gambling licence to open another betting shop in Deptford High Street. As a concerned resident, I firmly believe that allowing yet another betting shop in our local community would have serious consequences on various aspects of our neighbourhood, including socio-economic well-being, public safety, and the welfare of our school-going children.

**Socio-economic Reasons:**

Deptford High Street is already grappling with an over-concentration of betting shops, which has the potential to exacerbate socio-economic challenges in our community. As highlighted by reputable sources like the Institute for Public Policy Research (IPPR), such clustering of betting establishments is linked to higher levels of deprivation and negative socio-economic outcomes. The addition of another betting shop could further strain already vulnerable households and impact the overall economic health of the area.

### **Negative Aspects of Gambling:**

The detrimental impacts of gambling, particularly in areas with numerous betting shops, cannot be ignored. Extensive research conducted by the Gambling Commission demonstrates that high concentrations of betting establishments are associated with an increased risk of problem gambling and its associated adverse effects. This includes financial hardships, mental health issues, and strained relationships. The well-being of individuals and families in our community is at risk if we allow further proliferation of betting shops.

**Impact on Local Community and Residents:**

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(<https://www.met.police.uk/area/your-area/met/lewisham/deptford/about-us/crime-map>) where we can see the majority of antisocial behaviour and shoplifting on or near the high street.

**Proximity to Primary Schools:**

Adding another betting shop in such close proximity to two primary schools raises serious concerns about the well-being of our children. Research shows that the exposure of young people to gambling

environments, especially at an impressionable age, can normalise the behaviour and potentially lead to harmful consequences. We must prioritise the safety and welfare of our school-going children by creating a wholesome environment that shields them from exposure to gambling establishments.

Incidents Involving Betting Shops in Deptford High Street:

While I do not have direct access to current police records, I urge the Safer Communities Service to conduct a thorough examination of the police reports to fully comprehend the potential impact that granting this licence might have on public safety and law enforcement resources.

In light of these compelling reasons, I implore the Safer Communities Service to carefully consider the implications of granting a gambling licence to the Betting Company. Instead, I request the Council to prioritise the safety, well-being, and prosperity of our community by supporting diverse and sustainable businesses that contribute positively to our neighbourhood.

I trust that the Safer Communities Service will give serious consideration to this objection, which echoes the collective concerns of our community. We strive to maintain Deptford High Street as a vibrant, family-friendly, and safe place for all residents and visitors. Together, let us work towards fostering an environment that reflects the best interests and values of our community.

Thank you for your attention to this matter. I anticipate a thorough review of this objection and your commitment to safeguarding our community's interests.

### **Objection 3**

Subject: Strong Objection to Betting Company's Gambling License Application for Deptford High Street

Dear Sir/Madam,

I am writing to emphatically express my strong objection to the application made by the Betting Shop Operations Limited for a gambling license to open another betting shop in Deptford High Street. As a concerned resident, I firmly believe that allowing yet another betting shop in our local community would have serious consequences on various aspects of our neighbourhood, including socio-economic well-being, public safety, and the welfare of our school-going children.

Socio-economic Reasons:

Deptford High Street is already grappling with an over-concentration of betting shops, which has the potential to exacerbate socio-economic challenges in our community. As highlighted by reputable sources like the Institute for Public Policy Research (IPPR), such clustering of betting establishments is linked to higher levels of deprivation and negative socio-economic outcomes. The addition of another betting shop could further strain already vulnerable households and impact the overall economic health of the area.

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Incidents Involving Betting Shops in Deptford High Street:

While I do not have direct access to current police records, I urge the Safer Communities Service to conduct a thorough examination of the police reports to fully comprehend the potential impact that granting this license might have on public safety and law enforcement resources.

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I trust that the Safer Communities Service will give serious consideration to this objection, which echoes the collective concerns of our community. We strive to maintain Deptford High Street as a vibrant, family-friendly, and safe place for all residents and visitors. Together, let us work towards fostering an environment that reflects the best interests and values of our community. Thank you for your attention to this matter. I anticipate a thorough review of this objection and your commitment to safeguarding our community's interests.

**Objecton 4**

To Whom It May Concern:

I completely object to Jennings' application for a betting job at 80-82 Deptford High Street. I live in \*\*\*\*\*

There are already two Paddy Power betting shops on the High Street, and two casinos - these already prey on and exacerbate gambling addictions, increase the potential for crime to fund gambling habits, and encourage and contribute to financial deprivation which tends to most impact working-class and marginalised people. The absolute last thing we need in Deptford during a financial crisis where councils are struggling to support constituents, and individuals are going without basic essentials like heating to make ends meet, is more shops like Jennings.

We already open our front door to vulnerable addicts sitting on our doorstep occasionally, and they're human beings who deserve to be better supported by their government and their communities. I strongly believe another betting shop will go absolutely nowhere towards meaningfully supporting the most vulnerable in our communities and the very real problems of poverty and addiction that many Deptford/New Cross and wider Lewisham borough residents are experiencing.

This is before we get to the noise, fights and unpredictable addiction behaviour that occurs outside many local betting shops, and will be occurring directly on our doorstep if Jennings' application is approved. I already find the sounds of the high street difficult. (Many people seem to be under the impression that we all choose where we live, but this couldn't be further from many of our realities.) I believe a betting shop directly below my residence would have a direct negative impact on my mental health & wellbeing.

For these reasons, I would encourage Lewisham Borough Council to decline Jennings' Application for a Premises License under the Gambling Act 2005 at 80-82 Deptford High Street, SE8 4RT.

**Objection 5**

To whom it may concern,

It has come to my attention that Jenningsbet have put in an application for the property 80-82 Deptford High Street.

I strongly disagree to there being another betting shop on the high street, there are at least 2 already, a Jenningsbet and Paddy Power.

I hope that the council takes into account the negative consequences to the community should this application be accepted. There are many more beneficial and community-minded establishments that could take this spot.

Many thanks,

Objection 6

Hello

I live in \*\*\*\*\* on Deptford High street and I'm writing to you to object to Jennings opening a betting shop in our building.

Another resident in my flat wrote an email to you earlier with reasons why opening another betting shop on our street is very inappropriate, and I second her reasons. I will add a copy of that email below.

I would also like to add that there is already a Jennings betting shop a 15-minute walk from us in Greenwich, so we definitely don't need another here!

Copy of the letter:

"To whom it may concern

I completely object to Jennings' application for a betting job at 80-82 Deptford High Street. I live in \*\*\*\*\* on Deptford High Street.

There are already two Paddy Power betting shops on the High Street, and two casinos - these already prey on and exacerbate gambling addictions, increase the potential for crime to fund gambling habits, and encourage and contribute to financial deprivation which tends to most impact working-class and marginalised people. The absolute last thing we need in Deptford during a financial crisis where councils are struggling to support constituents, and individuals are going without basic essentials like heating to make ends meet, is more shops like Jennings.

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For these reasons, I would encourage Lewisham Borough Council to decline Jennings' Application for a Premises License under the Gambling Act 2005 at 80-82 Deptford High Street, SE8 4RT."

Yours Sincerely,



Objection 7

Dear Licensing Department,

I am a resident of Deptford and wish to express my concern about the proposed new betting shop in the High Street. I am aware that the former bank has been empty for some time but consider another betting shop to be problematic for the area.

Gambling is an increasingly dangerous addiction that destroys families. In addition, there is already considerable anti social behaviour associated with the Paddy Power betting shop and in an area where poverty is such an issue, it is short sighted and irresponsible to allow the licence to be given.

Thank you for your time.

Regards

**Objection 8**

To whom it may concern,

I am writing concerning the Notice of Application for a Premises Licence under the Gambling Act 2005 by Bettings Shop Operations Limited for a Jenningsbet at 80-82 Deptford High Street.

I am a leaseholder of the \*\*\*\*\* in this building and I am in objection to this application for a number of reasons, outlined below:

1) Betting shops have been shown to be a marker of social decline of an area, having a detrimental effect on places' vitality and viability and fuelling anti-social behaviour. It is evident that many local residents in Deptford face financial difficulties and struggle with addictions. Lewisham Council should be supporting and boosting these members of the community, not making them even more vulnerable to negative influences.

2) There are a number of betting shops and casinos already situated along Deptford High Street, so there can be no argument that there is any positive effect of adding another.

3) This betting shop would have a direct negative impact on my property. Anti-social behaviour such as noise and gamblers hanging around outside late into the evening affects personal safety, security and mental health for residents. This makes the property less desirable to live in and so devalues it.

Please can you send me more information about the application? I very much hope you can understand my concerns and those submitted by other residents, and see that this application must be rejected. Many thanks for your time.

Best wishes



## Licensing Committee

**Report title: (Basement) 69 Deptford High Street, SE8 4AA**

**Date:** 26 September 2023

**Key decision:** No.

**Class:** Part 1

**Ward(s) affected:** Deptford

**Contributors:** Safer Communities Service

### Outline and recommendations

Determination of Temporary Event Notice Application - 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

To consider the application for a Temporary Event Notice. The options open to members of the Committee are set out in paragraph 4 below.

**Proposal:** Temporary Event Notice (TEN)

**Legislation:** Licensing Act 2003

**Premises:** (Basement) 69 Deptford High Street, SE8 4AA

**Applicant:** Samuel James Willott

The notice was served in accordance with section 100 of the Licensing Act 2003.

#### 1. Notice Content & Objection

1.1 The Temporary Event Notice was received on 14<sup>th</sup> September 2023 and is for the following activities.

1.2 The sale by retail of alcohol for consumption on the premises for up to 120 people at any one time between the hours of 14:00 – 02:00 and Regulated

Entertainment between the hours of 17:00 – 01:00 on the 24<sup>th</sup> - 25<sup>th</sup> November 2023

- 1.3 The notice was served on the Metropolitan Police (MPS) and other responsible authorities on 15<sup>th</sup> September 2023. An objection was received from the MPS within the specified time limit in accordance with section 104 of the Licensing Act 2003.
- 1.4 The objection was received in relation to the Prevention of Crime and Disorder as well as Public Safety, Prevention of Public Nuisance and Protection of Children from Harm.
- 1.5 The premises is not currently licensed.

## **2. Legal and Human Rights Implications**

- 2.1 Where an objection notice is received following a Temporary Event Notice a licensing authority is required to hold a hearing. In this case the Licensing Authority is required to consider whether the proposed temporary event will promote all four licensing objectives.
- 2.2 The licensing authority is a public authority under the Human Rights Act 1998. Therefore the Licensing Authority is under a duty to act compatibly with Convention Rights in the exercise of their function. 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.
- 2.3 The right to give a Temporary Event Notice falls within the scope of civil rights and obligations in Article 6 (1) as it relates, in this case, to a Premises Licence holder's right to pursue commercial activity. This right is a qualified right therefore it may be interfered with if it is appropriate to protect the general interest of the community.

## **3. Equalities Implications**

- 3.1 The Equality Act 2010 includes a new public sector equality duty (the equality duty or duties) the duty covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race or religion or belief, sex and sexual orientation.
- 3.2 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 those who share a protected characteristic and those who do not.
- 3.3 As with the case with the original separate duties, the new duty continues to be a "have regard duty" and the weight to attach to it is a matter for the committee bearing in mind the relevance and proportionality. It is not an absolute requirement to eliminate discrimination, advance equality of opportunity or foster

good relations.

#### 4. Determination of objection notice

- 4.1 After having regard to all the representations heard, Members must take such steps as they consider appropriate to promote the prevention of crime and disorder and public nuisance. Therefore the Licensing Committee may;
1. Decide no action is appropriate to promote the licensing objectives therefore the temporary event may go ahead.
  2. Impose one or more conditions on the standard temporary event notice if-
    - a. the authority considers it appropriate for the promotion of the licensing objectives to do so, AND if
    - b. the conditions are also imposed on a premises licence or club premises certificate that has effect in respect of the same premises, or any part of the same premises, as the standard temporary event notice, and
    - c. the conditions would not be inconsistent with the carrying of licensable activities under the standard temporary event notice
  3. Issue a counter notice if it considers it is appropriate to promote the licensing objectives, therefore the temporary event may not go ahead.
- 4.2 There is a right of appeal to the Magistrates Court against a decision either to give a counter notice or to allow the temporary event to go ahead.

<u>Short Title of Document</u>	<u>Background Papers</u> <u>Date</u>	<u>Appendix</u>
Temporary Event Notice		
Application rec'd	14/09/2023	
<u>Police Objection</u>		
Objection rec'd	15/09/2023	
Report Author – Clare Chown		



\* required information

### Section 1 of 9

You can save the form at any time and resume it later. You do not need to be logged in when you resume.

System reference  This is the unique reference for this application generated by the system.

Your reference  You can put what you want here to help you track applications if you make lots of them. It is passed to the authority.

Are you an agent acting on behalf of the applicant?

Yes  No

Put "no" if you are applying on your own behalf or on behalf of a business you own or work for.

### Applicant Details

\* First name

\* Family name

\* E-mail

Main telephone number  Include country code.

Other telephone number

Indicate here if you would prefer not to be contacted by telephone

Are you:

Applying as a business or organisation, including as a sole trader

Applying as an individual

A sole trader is a business owned by one person without any special legal structure. Applying as an individual means you are applying so you can be employed, or for some other personal reason, such as following a hobby.

Continued from previous page...

**Your Address**

Address official correspondence should be sent to.

* Building number or name	69
* Street	Deptford High Street
District	Deptford
* City or town	Lewisham
County or administrative area	London
* Postcode	SE8 4AA
* Country	United Kingdom

**Section 2 of 9**

**APPLICATION DETAILS** (See also guidance on completing the form, general notes and note 1)

Have you had any previous or maiden names?

- Yes  No

\* Your date of birth

<input type="text"/>	/	<input type="text"/>	/	<input type="text"/>
dd		mm		yyyy

Applicant must be 18 years of age or older

National Insurance number

<input type="text"/>	This box need not be completed if you are an individual not liable to pay UK national insurance.
----------------------	--

Place of birth

<input type="text"/>
----------------------

**Correspondence Address**

Is the address the same as (or similar to) the address given in section one?

- Yes  No

If "Yes" is selected you can re-use the details from section one, or amend them as required. Select "No" to enter a completely new set of details.

Building number or name	<input type="text"/>
Street	<input type="text"/>
District	<input type="text"/>
City or town	<input type="text"/>
County or administrative area	<input type="text"/>
Postcode	<input type="text"/>
Country	United Kingdom

Continued from previous page...

### Additional Contact Details

Are the contact details the same as (or similar to) those given in section one?

If "Yes" is selected you can re-use the details from section one, or amend them as required. Select "No" to enter a completely new set of details.

Yes  No

E-mail

Telephone number

Other telephone number

### Section 3 of 9

### THE PREMISES

I, the proposed user, hereby give notice under section 100 of the Licensing Act 2003 of my proposal to carry out a temporary activity at the premises described below.

Give the address of the premises where you intend to carry on the licensable activities or if it has no address give a detailed description (including the Ordnance Survey references). [\(See also guidance on completing the form, note 2\)](#)

\* Does the premises have an address?

Yes  No

### Address

Is the address the same as (or similar to) the address given in section one?

If "Yes" is selected you can re-use the details from section one, or amend them as required. Select "No" to enter a completely new set of details.

Yes  No

\* Building number or name

\* Street

District

\* City or town

County or administrative area

\* Postcode

\* Country

\* Does a premises licence or club premises certificate have effect in relation to the premises (or any part of the premises)?

Neither  Premises licence  Club premises certificate

### Location Details

\* Provide further details about the location of the event

The location is a recently refurbished basement beneath 69 Deptford High Street. With access via Comet Place. Until now it has only been used as storage, but for this event we would like to display photos of the various works carried out with a number of projects. Including the VIY youth project.

If you intend to use only part of the premises at this address or intend to restrict the area to which this notice applies, give a description and details below [\(see also guidance on completing the form, note 3\)](#)



Continued from previous page...

Describe the nature of the premises below [\(see also guidance on completing the form, note 4\)](#)

Describe the nature of the event below [\(see also guidance on completing the form, note 5\)](#)

#### Section 4 of 9

#### LICENSABLE ACTIVITIES

State the licensable activities that you intend to carry on at the premises [\(see also guidance on completing the form, note 6\)](#):

- The sale by retail of alcohol
- The supply of alcohol by or on behalf of a club to, or to the order of, a member of the club
- The provision of regulated entertainment
- The provision of late night refreshment
- The giving of a late temporary event notice

[\(See also guidance on completing the form, note 7\).](#)

Late notices can be given no later than 5 working days but no earlier than 9 working days before the event.

[\(See also guidance on completing the form, note 8\).](#)

#### Event Dates

There must be a period of at least 10 working days between the date you submit this form and the date of the earliest event when you will be using these premises for licensable activities.

State the dates on which you intend to use these premises for licensable activities

[\(see also guidance on completing the form, note 9\)](#)

Event start date       /  /   
   dd            mm            yyyy

The maximum period for using premises for licensable activities under the authority of a temporary event notice is 168 hours or seven days.

Event end date         /  /   
   dd            mm            yyyy

*Continued from previous page...*

State the times during the event period that you propose to carry on licensable activities (give times in 24 hour clock)

14:00 - 02:00

[\(see also guidance on completing the form, note 10\)](#)

State the maximum number of people at any one time that you intend to allow to be present at the premises during the times when you intend to carry on licensable activities, including any staff, organisers or performers

120

Note that the maximum number of people cannot exceed 499.

[\(see also guidance on completing the form, note 11\)](#)

If the licensable activities will include the supply of alcohol, state whether the supplies will be for consumption on or off the premises, or both

[\(see also guidance on completing the form, note 12\):](#)

- On the premises only
- Off the premises only
- Both

### Section 5 of 9

#### RELEVANT ENTERTAINMENT [\(See also guidance on completing the form, note 13\)](#)

State if the licensable activities will include the provision of relevant entertainment. If so, state the times during the event period that you propose to provide relevant entertainment

There will be music provided from 17:00 - 01:00

### Section 6 of 9

#### PERSONAL LICENCE HOLDERS [\(See also guidance on completing the form, note 14\)](#)

Do you currently hold a valid personal licence?  Yes  No

Provide the details of your personal licence below.

Issuing licensing authority

Licence number

Date of issue  /  /   
dd mm yyyy

Any further relevant details

Continued from previous page...

**Section 7 of 9**

**PREVIOUS TEMPORARY EVENT NOTICES** [\(See also guidance on completing the form, note 15\)](#)

Have you previously given a temporary event notice in respect of any premises for events falling in the same calendar year as the event for which you are now giving this temporary event notice?

Yes  No

State the number of temporary event notices (including the number of late temporary event notices, if any) you have given for events in that same calendar year

Have you already given a temporary event notice for the same premises in which the event period:

- a) Ends 24 hours or less before; or  Yes  No
- b) Begins 24 hours or less after the event period proposed in this notice?

**Section 8 of 9**

**ASSOCIATES AND BUSINESS COLLEAGUES** [\(See also guidance on completing the form, note 16\)](#)

Has any associate of yours given a temporary event notice for an event in the same calendar year as the event for which you are now giving a temporary event notice?

Yes  No

Has any associate of yours already given a temporary event notice for the same premises in which the event period:

- a) Ends 24 hours or less before; or  Yes  No
- b) Begins 24 hours or less after the event period proposed in this notice?

Continued from previous page...

Has any person with whom you are in business carrying on licensable activities given a temporary event notice for an event in the same calendar year as the event for which you are now giving a temporary event notice?

Yes

No

Has any person with whom you are in business carrying on licensable activities already given a temporary event notice for the same premises in which the event period:

Yes

No

- a) Ends 24 hours or less before; or
- b) Begins 24 hours or less after the event period proposed in this notice?

### Section 9 of 9

#### CONDITION [\(See also guidance on completing the form, note 18\)](#)

It is a condition of this temporary event notice that where the relevant licensable activities described in Sections 4 and 5 above include the supply of alcohol that all such supplies are made by or under the authority of the premises user.

#### PAYMENT DETAILS

This fee must be paid to the authority. If you complete the application online, you must pay it by debit or credit card.

This formality requires a fixed fee of £21

#### DECLARATION [\(See also guidance on completing the form, note 19\)](#)

The information contained in this form is correct to the best of my knowledge and belief. I understand that it is an offence: (i) to knowingly or recklessly make a false statement in connection with this temporary event notice and (ii) to permit an unauthorised licensable activity to be carried on at any place and that a person is liable on conviction for any such offence to a fine not exceeding £20,000, or to imprisonment for a term not exceeding six months, or to both.

Ticking this box indicates you have read and understood the above declaration

This section should be completed by the applicant, unless you answered "Yes" to the question "Are you an agent acting on behalf of the applicant?"

\* Full name

Samuel James Willott

\* Capacity

120

\* Date

14 / 09 / 2023

dd

mm

yyyy

Add another signatory

**Continued from previous page...**

Once you're finished you need to do the following:

1. Save this form to your computer by clicking file/save as...
2. Go back to <https://www.gov.uk/apply-for-a-licence/temporary-event-notice/lewisham/apply-1> to upload this file and continue with your application.

Don't forget to make sure you have all your supporting documentation to hand.

**OFFICE USE ONLY**

Applicant reference number	<input type="text" value="Event launch"/>
Fee paid	<input type="text"/>
Payment provider reference	<input type="text"/>
ELMS Payment Reference	<input type="text"/>
Payment status	<input type="text"/>
Payment authorisation code	<input type="text"/>
Payment authorisation date	<input type="text"/>
Date and time submitted	<input type="text"/>
Approval deadline	<input type="text"/>
Error message	<input type="text"/>
Is Digitally signed	<input type="checkbox"/>

[1](#) [2](#) [3](#) [4](#) [5](#) [6](#) [7](#) [8](#) [9](#) Next >



PC Gillian Pearce  
9 Holbeach Road  
Catford  
SE6 4TW

Email:  
Gillian.D.Pearce@met.police.uk

Your ref:  
Our ref:

15<sup>th</sup> September 2023

**69 Deptford High Street SE8 4AA**

Lewisham Police Licensing acknowledge receipt of an application for an event in the basement of the above venue.

The event is described as:

The location is a recently refurbished basement beneath 69 Deptford High Street. With access via Comet Place. Until now it has only been used to as storage, but for this event we would like to display photos of the various works carried out with a number of projects. Including the VIY youth project.

Police would like to object to this application under the following Licensing objectives:

Prevent crime and disorder  
Public safety  
Prevent public nuisance  
Protect children from harm

After considering the application, conditions offered by the applicant and taking into account the location of the proposed premises and its environs Police licensing feel that the proposed premises needs to be visited in order to establish its suitability.

A previous event was not objected to by police however, it is now noted the applicant has raised both the number of people at the event and extended the hours applied for. In hind sight this event should have been viewed before the first TEN was allowed to go ahead.

The event is to be held in a basement and safety of patrons is a concern. Just because the first event passed without issue may be due to luck. Basements are a hazard due to the entry and egress points and large volumes of people make this more dangerous.

There is also no mention of age groups or if children will be at this event and what measures are put in place to mitigate any harm.

Furthermore this is in the high street where we have had considerable complaints regarding noise and anti social behaviour.

Kind regards

PC Gillian Pearce  
Licensing Officer Lewisham

TEN SIGNATURE PAGE

PREMISES of Event: Basement 69 Deptford High Street, SE8 4AA

DATE AND TIMES of Event: 24<sup>th</sup> – 25<sup>th</sup> November 2023

AUTHORISING OFFICER: Clare Chown

OFFICERS SIGNATURE: *Clare Chown*

DATE OF SIGNING: 18 September 2023





## TEMPORARY EVENT NOTICE

To: Samuel James Willott

Of:

The Council of the London Borough of Lewisham have acknowledged the event as follows:

Premises: Basement – 69 Deptford High Street  
Deptford  
London  
SE8 4AA

Date: 24<sup>th</sup>-25<sup>th</sup> November 2023

Activities Permitted: ALC (On), Regulated Entertainment

Capacity: 120

Directorate for Community Services  
Safer Communities Service  
Licensing Authority  
Holbeach Office  
9 Holbeach Road  
London  
SE6 4TW

Director of Communities,  
Partnerships and Leisure  
Proper Officer for Licensing  
London Borough of Lewisham

**SHOULD A COUNTER NOTICE BE ISSUED IN ACCORDANCE WITH SECTION 105 OR 107 OF THE LICENSING ACT 2003 THIS EVENT WILL NOT BE PERMITTED.**

**A TEN DOES NOT RELIEVE THE PREMISES USER FROM ANY REQUIREMENTS UNDER PLANNING LAW FOR APPROPRIATE PLANNING PERMISSION WHERE IT IS REQUIRED.**