



Lewisham

Consultation comments and responses

Review of the statutory Statement of Principles for Gambling

September 2023

Introduction

The Council is the licensing authority in Lewisham for the purposes of premises-based licensing activity under the Gambling Act 2005 (the Act).

The Act has three licensing objectives:

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

Every three years we must publish a gambling policy setting out the principles we will apply when exercising our licensing functions under the Act. Our policy plays a vital role in managing the risk of gambling-related harm in Lewisham and regulating gambling activity to lessen the risk of such harm.

We are proposing some minor changes to our existing policy to:

- update changes in the law and national guidance
- update out of date references.
- remove sections of the current policy that were out of date or no longer relevant.

We have consulted on those changes and sought the views of residents, licence holders, and other stakeholders. The consultation started on 24 July 2023 and ended at midnight on 27 August 2023.

We received 32 responses.

In line with paragraph 5.5 in Part A of the draft statement of principles, officers have carefully considered the consultee's views, and where appropriate have amended the draft document to reflect those views. Where officers have been unable to accommodate those views, they have explained why.

This document provides the comments received during the consultation, and our responses to those comments.

Part A: Introduction and Overview

Section 349 of the Gambling Act 2005 requires the Council to publish a policy setting out the principles we propose to apply when exercising our functions under the Act.

The draft policy sets out the general approach the Council proposes to take when it considers applications for licences.

In Part A, we have updated contact details for the responsible authorities and updated the recent changes to the borough ward boundaries.

Do you agree that Part A outlines the scope of the of Policy and the principles we will apply?

- Yes (18) (1 comment)
- No (6) (6 comments)
- Don't know (7) (5 comments)

Answer	Additional comments	We said
Yes	One of your aims on the previous page was correcting spelling / grammar - mine isn't great but - you have already bungled this question!	We have proofread Part A and did not identify any spelling or grammatical errors.
No	Gambling is a mechanism to transfer wealth from the poor to the rich. The people in betting shops on Catford high street are not recreational players having fun, and everyone knows it. Take greater action to reduce gambling in the borough.	The Gambling Act 2005 places a legal duty on the Licensing Authority to aim to permit gambling in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives. Our policy aims to achieve this by moderating the impact of gambling on the Borough, for example by attaching conditions to licences, rather than aiming to prevent it all together.

Answer	Additional comments	We said
		<p>We are unable to arbitrarily close or reduce the number of gambling premises. A premises licence can only be revoked following a review of the licence which would usually arise following concerns regarding the operation of the premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>No</p>	<p>You have a responsibility to enable the creation and sustaining of healthy lively local communities. It is doubtful that gambling establishments do anything positive for the local community. Deptford high street is saturated with gambling - bookies, slot machine arcades etc. How does this in any way benefit the local community? They only drag the community down. Why is this not a consideration in your policy?</p>	<p>Paragraph 1.4 of Part A of the draft policy recognises the potential impact of gambling on the community.</p> <p>Through this policy, the licensing authority will seek to address the needs of residents to ensure a safe and healthy environment in which to live and work, together with safe and well-run gambling premises that will benefit the local economy.</p> <p>The licensing authority has sought to achieve a proper balance between implementing a responsible and consistent standard of regulation with minimizing the impact of regulation on businesses.</p> <p>For this reason, we have not made any changes to</p>

Answer	Additional comments	We said
		<p>this effect within the draft Statement.</p>
<p>No</p>	<p>I know this gambling activity needs to be regulated but I think the Lewisham council has let too many applications through over the years. Now the town centres have far too many gambling shops and opportunities. Some if not all should be closed</p>	<p>The Gambling Act 2005 places a legal duty on the Licensing Authority to aim to permit gambling in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives.</p> <p>The Licensing Authority is unable to refuse applications for gambling premises or close premises solely because there are already too many premises, or they are not wanted by the community. The licensing authority must consider each case on its individual merits.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>No</p>	<p>The concentration of gambling premises within a short distance encourages gambling addicts to move from one provider to another. There should be at least one mile between gambling premises.</p>	<p>The Licensing Authority is unable to create a ‘cumulative impact area’ to enable us to restrict the distance between gambling premises solely because there are already too many premises in a particular area.</p> <p>Decision makers are required to determine each gambling application on its individual merits and the draft policy enables the licensing authority to do this.</p>

Answer	Additional comments	We said
		<p>The licensing authority would be unable to set an arbitrary distance between premises or refuse an application due to the close proximity of other gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	<p>More of the policy and principle should be focused on the potential detrimental impact on the (social) environment by granting/ renewing a licence/s, particularly in the wider context of creating a high street that's more balanced and creates a community that we're aspiring to create.</p>	<p>We have a statutory duty to aim to permit gambling activity and</p> <p>The gambling policy cannot be used to address matters that can be dealt with using relevant planning control or other regulatory regimes.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	<p>Living in Lewisham Central ward there are just too many gambling establishments in this ward! It is disheartening to see the sheer number of betting parlours and gaming halls in such a concentrated area. This needs to be looked into. The council should safeguard local residents and ensure their needs are met with a varied offering of entertainment venues not associated with gambling. Zoning restrictions should prevent one type of business from taking over a ward to the detriment of local residents.</p>	<p>A cumulative impact policy (CIP) is a mechanism created under the Licensing Act 2003 to restrict applications for new premises licences, and variations to existing premises licences. It only applies to premises licensed under the Licensing Act 2003 and in respect of applications under the same legislation.</p> <p>An approach such as 'zoning' cannot be taken in respect of gambling</p>

Answer	Additional comments	We said
		<p>premises because a legal mechanism (for managing cumulative impact of premises) does not exist under the Gambling Act 2005.</p> <p>Consequently, the draft Gambling Policy cannot introduce a policy to address cumulative impact. For this reason, we have not made any changes to this effect within the draft Statement.</p>
Don't know	we don't want gambling in the borough.	<p>See paragraph 2.5 in Part C of the draft policy.</p> <p>The Gambling Commission's Guidance to Licensing Authorities states that "moral objections to gambling are not a valid reason to reject applications for premises licences".</p> <p>In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives.</p> <p>An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception</p>

Answer	Additional comments	We said
		<p>of the casino resolution powers).</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>Don't know</p>	<p>The information provided is not in a format that is accessible to me as a disabled person. This is a persistent and repeated occurrence on all Lewisham surveys I can recall completing.</p> <p>I am opposed to any and all gambling in Lewisham premises and land, including parks, including charitable fundraising.</p>	<p>We have reviewed the draft statement and increased the text contrast throughout the document to make the text easier to read.</p> <p>We have also reformatted the tables in Appendix 5 to remove accessibility issues and enable people to access the information using a screen reader.</p> <p>The Gambling Act 2005 places a legal duty on the Licensing Authority to aim to permit gambling in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives.</p> <p>The Licensing Authority is unable to refuse applications for gambling premises or close premises solely because there are already too many premises, or they are not wanted by the community. We must consider each case on its individual merits.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>

Answer	Additional comments	We said
Don't know	Keep them out of the borough. In richer parts of London, you don't see so many so why overload them in poor areas?	<p>Considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences.</p> <p>In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives.</p> <p>An authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
Don't know	It's very wordy and I couldn't get to the end, should be easier to read and plainer English. Too long. This why I ticked don't know.	We have considered this comment and note that it is repeated by the same respondent throughout the responses to the consultation. Due to this being the view of only one respondent, we have not made any amendments to this effect.

Answer	Additional comments	We said
<p>Don't know</p>	<p>In general, I think we should not have these institutions. Especially the ones we have in Lewisham. It's conducive of keeping people in a bind from which they can't come out of.</p>	<p>The Gambling Act 2005 places a legal duty on the Licensing Authority to aim to permit gambling in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives.</p> <p>We must consider each case on its individual merits The licensing authority is unable to refuse applications for gambling premises based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>

Part B: Overview of Considerations for the Licensing Authority

Part B of the draft policy sets out the considerations the licensing authority will apply when determining applications under the Act.

Does Part B outline the considerations that we will apply when determining applications, as well as the relevant licensing objectives?

- Yes (19) (1 comment)
- No (7) (7 comments)
- Don't know (5) (5 comments)

Answer	Additional comments	We said
Don't know	<p>The information provided is not in a format that is accessible to me as a disabled person. This is a persistent and repeated occurrence on all Lewisham surveys I can recall completing.</p> <p>I am opposed to any and all gambling in Lewisham premises and land, including parks, including charitable fundraising.</p>	<p>We have reviewed the draft statement and increased the text contrast throughout the document to make the text easier to read.</p> <p>We have also reformatted the tables in Appendix 5 to remove accessibility issues and enable people to access the information using a screen reader.</p> <p>The Gambling Act 2005 places a legal duty on the Licensing Authority to aim to permit gambling in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives.</p> <p>The Licensing Authority is unable to refuse applications for gambling premises or close a gambling business solely because there are already too many premises, or</p>

Answer	Additional comments	We said
		they are not wanted by the community. We must consider each case on its individual merits.
Don't know	Keep them out of the borough. In richer parts of London, you don't see so many so why overload them in poor areas?	<p>The Gambling Act 2005 places a legal duty on the Licensing Authority to aim to permit gambling in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives.</p> <p>We must consider each case on its individual merits The licensing authority is unable to refuse applications for gambling premises based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
Don't know	This is also way to long and I couldn't read the whole thing. Does it really need all the demographics stuff at the start?	<p>The Gambling Act 2005 (Licensing Authority Policy Statement) (England and Wales) Regulations 2006 set out requirements as to the form and publication of licensing authority statements of policy.</p> <p>In addition to those requirements, the Gambling Commission's guidance sets out certain</p>

Answer	Additional comments	We said
		<p>information that the Commission considers should be included in all licensing authority statements of policy including a description of the area to which the policy applies.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
Don't know	We do not need them	<p>As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	<p>whilst this section of the text seems comprehensive and shows the council is aware of the pitfalls of gambling setups it is weak in its statement 'The density of different types of gambling premises in certain locations'</p> <p>Withing eyesight of the Lewisham clocktower there are near a dozen gambling businesses and this area is heavily used by children and some of the most vulnerable</p>	<p>As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>

Answer	Additional comments	We said
	<p>residents of the borough. Having gambling businesses so tightly concentrated creates doesn't address the local need, it only works to encourage problem gambling.</p>	
<p>No</p>	<p>we don't want gambling here</p>	<p>As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>No</p>	<p>Outlaw gambling. Prevent transfer of wealth from poor to rich.</p>	<p>As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>No</p>	<p>You seem to be adopting a box ticking approach - if a new applicant can pay lip service to your rules, then you let them in. Instead, you should take a critical approach - what BENEFIT does gambling bring? How will an increase in gambling establishments enhance</p>	<p>As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to</p>

Answer	Additional comments	We said
	and enrich the community? How do they help the community to flourish and expand? You should be trying to reduce gambling establishments to the minimum possible not creating an environment where their numbers can grow.	this effect within the draft Statement.
No	These statements are too long and difficult to understand for most ordinary readers! From quick glance it appears gambling is not seen dangerous enough, instead seen as an acceptable and legal leisure activity. Stop legalising gambling in this borough	As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises. For this reason, we have not made any changes to this effect within the draft Statement.
No	The concentration of gambling premises within a short distance encourages gambling addicts to move from one provider to another. There should be at least one mile between gambling premises.	The Gambling Act 2005 places a legal duty on the Licensing Authority to aim to permit gambling in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives. The Licensing Authority is unable to refuse applications for gambling premises or close premises solely because there are already too many premises, or they are not wanted by the community. We must consider each case on its individual merits.

Answer	Additional comments	We said
		<p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>No</p>	<p>Local area profile should be front and centre of this document, especially if we're to really improve the town centre. Already we have too many gambling establishments. Literally you can walk out of one door into another one. They're a magnet for vulnerable people, who regularly can be found sat not too far outside - intoxicated on alcohol and drugs, mental health issues. It's a disgrace and the major and those in the local council office should be ashamed that more has not been done, as this has been increasing over the long term.</p>	<p>The local area profile is prominently referenced in Part B (paragraphs 7.1 to 7.7) of the draft policy.</p> <p>A local area profile is an assessment of the local environment. It helps to identify and inform risks in certain areas that gambling operators will need to address in their risk assessment. The risk assessment will form a part of any new licence application, or an application to vary a licence.</p> <p>The licensee would be reasonably expected to have sufficient controls in place to mitigate associated risks in such areas and, if not, the licensing authority would consider other controls themselves.</p> <p>A local area profile cannot be used to restrict the number of gambling premises or to manage other social issues.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>

Answer	Additional comments	We said
No	Need to make it harder for firms/premises to obtain licenses. Set the bar as high as possible to discourage gambling in Lewisham.	As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises. For this reason, we have not made any changes to this effect within the draft Statement.
Yes	There is typo in 2.4 - should be losses do not lose. Only skim-read so not sure if others?	We have corrected the typo.

Part C: Premises licences

Any person or business that wishes to offer premises-based gambling which requires a Gambling Commission’ operating licence, must apply to the Licensing Authority for a premises licence.

Part C outlines the considerations and decision-making process for the distinct types of gambling premises.

Are the considerations outlined in the Part C, clear and sufficient to promote the licensing objectives for the distinct types of gambling premises?

- Yes (19) (0 comment)
- No (9) (9 comments)
- Don't know (5) (4 comments)

Answer	Additional comments	We said
Don't know	<p>The information provided is not in a format that is accessible to me as a disabled person. This is a persistent and repeated occurrence on all Lewisham surveys I can recall completing.</p> <p>I am opposed to any and all gambling in Lewisham premises and land, including parks, including charitable fundraising.</p>	<p>We have reviewed the draft statement and increased the text contrast throughout the document to make the text easier to read.</p> <p>We have also reformatted the tables in Appendix 5 to remove accessibility issues and enable people to access the information using a screen reader.</p> <p>As mentioned above, an authority’s decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>

Answer	Additional comments	We said
Don't know	Keep them out of the borough. In richer parts of London, you don't see so many so why overload them in poor areas?	As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises. For this reason, we have not made any changes to this effect within the draft Statement.
Don't know	The only bit I could read properly was the bit highlighted in blue/green about entrances, the rest is too long, uses too many words, and gave me a headache.	We have noted this statement, but we are unable to consider this in relation to potential policy changes.
Don't know	Again, not needed.	As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises. For this reason, we have not made any changes to this effect within the draft Statement.
No	At this point I have to say, these council forms are created for lawyers and not for residents. It's ridiculous to expect the lay person to comment on these overblown documents without a law degree. It's a shame the council treats its residents so poorly.	We have noted this statement, but we are unable to consider this in relation to potential policy changes.

Answer	Additional comments	We said
No	we don't want gambling here	<p>As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	Outlaw gambling. Prevent transfer of wealth from poor to rich.	<p>As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	No because surely the overall presumption should be against the encouragement of gambling rather than bending over n'a jeards tu facilitate it as you do. It should be incumbent on applicants to show that there is no provision if the type of 'service' they offer and that the opening of a new establishment will benefit the community. I just can't understand why as a council you seem so keen to increase gambling in the area.	<p>The Gambling Act 2005 places a legal duty on the Licensing Authority to aim to permit gambling in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives.</p> <p>As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to</p>

Answer	Additional comments	We said
		this effect within the draft Statement.
No	Too difficult to get one's head around this legal jargon. Make statements more accessible and easier to understand so that the general public can express an educated and concerned view properly	We have considered this comment and note that it is repeated by the same respondent throughout the responses to the consultation. Due to this being the view of only one respondent, we have not made any amendments to this effect.
No	An addict is addicted to gambling, the type is irrelevant. An alcoholic does not care which type of alcohol they consume.	We have noted this statement, but we are unable to consider this in relation to potential policy changes.
No	<p>"There are acknowledgments included that should be removed. Or at least be more substantiated with evidence rather than only make comment on some based on the lack of evidence E.g., customer enjoyment, security.</p> <p>In addition, I think it should take planning and law into account.</p> <p>Also, include a consideration on the potential (negative) impact on the local area."</p>	<p>We have amended the draft policy at Part B paragraphs 2.1 to 2.10 to remove these statements.</p> <p>Section 153 of the Gambling Act 2005 specifically excludes licensing authorities from considering whether an application is to be permitted in accordance with law relating to planning or building.</p> <p>The Gambling Commission's Guidance states that the policy statement should include a firm commitment to avoid duplication with other regulatory regime.</p> <p>For this reason, we have not made any changes to</p>

Answer	Additional comments	We said
		this effect within the draft Statement.
No	2.3. I think the borough should actively discourage all gambling.	<p>As mentioned above, the Gambling Act 2005 places a legal duty on the Licensing Authority to aim to permit gambling in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives.</p> <p>An authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>

Part D: Travelling Fairs and Permits

Part D outlines the considerations for applications that fall outside of a ‘premises licence’, such as travelling fairs and gambling or gaming permits.

Are the considerations outlined in the Part D, clear and sufficient to promote the licensing objectives?

- Yes (14) (0 comment)
- No (8) (6 comments)
- Don't know (8) (3 comments)

Answer	Additional comments	We said
Don't know	<p>The information provided is not in a format that is accessible to me as a disabled person. This is a persistent and repeated occurrence on all Lewisham surveys I can recall completing.</p> <p>I am opposed to any and all gambling in Lewisham premises and land, including parks, including charitable fundraising.</p>	<p>We have reviewed the draft statement and increased the text contrast throughout the document to make the text easier to read.</p> <p>We have also reformatted the tables in Appendix 5 to remove accessibility issues and enable people to access the information using a screen reader.</p> <p>As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
Don't know	<p>Keep them out of the borough. In richer parts of London, you don't see so</p>	<p>As mentioned above, an authority's decisions or policy cannot be based on need, a dislike of</p>

Answer	Additional comments	We said
	many so why overload them in poor areas?	<p>gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
Don't know	Is anybody apart from lawyers going to read this? the language is so convoluted that I couldn't.	We have noted this comment. The Statement is a formal document and as such it uses specific language to provide certainty of our approach for all stakeholders.
Don't know	Again, not needed.	<p>As mentioned above, an authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	At this point I have to say, these council forms are created for lawyers and not for residents. It's ridiculous to expect the lay person to comment on these overblown documents without a law degree. It's a shame the council treats its residents so poorly.	We have noted this statement, but we are unable to consider this in relation to potential policy changes.
No	we don't want gambling here	As mentioned above, an authority's decisions or

Answer	Additional comments	We said
		<p>policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	<p>Outlaw gambling. Prevent transfer of wealth from poor to rich.</p>	<p>As mentioned above, an authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	<p>I don't think that getting a permit for a gambling machine in a pub, say should be treated in the same way as a permit for a travelling temporary fair. The two are completely different. Permits for in pub slot machines should be subject to the same policy as licensing of gambling establishments in an area</p>	<p>The Gambling Act provides an automatic entitlement to alcohol licensed premises (on-sales) to make two category C and D machines available for use on the premises.</p> <p>The Act provides an automatic entitlement to fairs to make one or more category D machines available for use at the fair as they are ancillary to amusement at the fair.</p> <p>The licensing authority's policy must reflect and comply with the</p>

Answer	Additional comments	We said
		<p>requirements as set out in the Gambling Act.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	<p>Too difficult to get one's head around this legal jargon. Make statements more accessible and easier to understand so that the general public can express an educated and concerned view properly</p>	<p>We have considered this comment and note that it is repeated by the same respondent throughout the responses to the consultation. Due to this being the view of only one respondent, we have not made any amendments to this effect.</p>
No	<p>A non-commercial club is acceptable as is a lottery to raise money for charitable purposes.</p>	<p>This view supports the requirements as set out in Part 4 to Schedule 11 of the Gambling Act 2005. Therefore, we have not made any amendments to this effect.</p>

Part E: Notices

Part F outlines the considerations in circumstances where no premises licence exists, but a gambling operator wishes to use premises temporarily to provide gambling facilities.

Are the considerations outlined in the Part E, clear and sufficient to promote the licensing objectives?

- Yes (14) (0 comment)
- No (10) (8 comments)
- Don't know (7) (2 comments)

Answer	Additional comments	We said
Don't know	The information provided is not in a format that is accessible to me as a disabled person. This is a persistent and repeated occurrence on all Lewisham surveys I can recall completing. I am opposed to any and all gambling in Lewisham premises and land, including parks, including charitable fundraising.	<p>We have reviewed the draft statement and increased the text contrast throughout the document to make the text easier to read.</p> <p>We have also reformatted the tables in Appendix 5 to remove accessibility issues and enable people to access the information using a screen reader.</p> <p>As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	This is not clear at all. Having read the whole document now - although	We have considered this comment and note that it is repeated by the same

Answer	Additional comments	We said
	I ticked 'don't know' earlier - I don't believe that any of it is 'clear and sufficient', except possibly for somebody with legal training who is used to reading such documents.	respondent throughout the responses to the consultation. Due to this being the view of only one respondent, we have not made any amendments to this effect.
No	I will not read further and I will object to this exercise.	We have noted this statement, but we are unable to consider this in relation to potential policy changes.
No	we don't want gambling here	<p>As mentioned above, an authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	Do not permit gambling in Lewisham.	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>

Answer	Additional comments	We said
No	No. It's all just about whether premises are suitable rather than whether gambling should be allowed at all.	<p>As mentioned above, an authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	gambling licensing activities should not be promoted by the council at all	<p>As mentioned above, an authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	Premises owned by charities should be allowed	This view supports the requirements as set out in Part 4 to Schedule 11 of the Gambling Act 2005. Therefore, we have not made any amendments to this effect.
No	This should be more difficult and discourage all gambling.	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is</p>

Answer	Additional comments	We said
		<p>undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>

Part F: Small Society Lotteries

Part F explains the requirements that small society lotteries need to meet to register with the licensing authority.

Are the requirements outlined in the Part F, clear and sufficient to promote the licensing objectives?

- Yes (14) (0 comment)
- No (4) (3 comments)
- Don't know (6) (2 comments)

Answer	Additional comments	We said
Don't know	<p>The information provided is not in a format that is accessible to me as a disabled person. This is a persistent and repeated occurrence on all Lewisham surveys I can recall completing.</p> <p>I am opposed to any and all gambling in Lewisham premises and land, including parks, including charitable fundraising.</p>	<p>We have reviewed the draft statement and increased the text contrast throughout the document to make the text easier to read.</p> <p>We have also reformatted the tables in Appendix 5 to remove accessibility issues and enable people to access the information using a screen reader.</p> <p>As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
Don't know	Keep them out of the borough. In richer parts of London, you don't see so	As mentioned above, the licensing authority has a

Answer	Additional comments	We said
	many so why overload them in poor areas?	<p>statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	Ridiculous	<p>We have noted this statement, but we are unable to consider this in relation to potential policy changes.</p>
No	we don't want gambling here	<p>As mentioned above, the licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	gambling licensing activities should not be promoted by the council at all	<p>As mentioned above, the licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based</p>

Answer	Additional comments	We said
		<p>on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>

Part G: Applications and Delegations

Part G outlines how the Council sets fees for applications and how the Council delegates decisions.

Are you supportive of the way in which we calculate fees and delegate decisions? - If no, what additions or changes do you think we should consider?

- Yes (13) (0 comment)
- No (9) (7 comments)
- Don't know (9) (4 comments)

Answer	Additional comments	We said
Don't know	<p>The information provided is not in a format that is accessible to me as a disabled person. This is a persistent and repeated occurrence on all Lewisham surveys I can recall completing.</p> <p>I am opposed to any and all gambling in Lewisham premises and land, including parks, including charitable fundraising.</p>	<p>We have reviewed the draft statement and increased the text contrast throughout the document to make the text easier to read.</p> <p>We have also reformatted the tables in Appendix 5 to remove accessibility issues and enable people to access the information using a screen reader.</p> <p>As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
Don't know	Keep them out of the borough. In richer parts of London, you don't see so	As mentioned above,

Answer	Additional comments	We said
	many so why overload them in poor areas?	<p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
Don't know	I didn't really understand from that how fees are calculated, other than that there are a series of bands.	We have amended the draft policy to explain that the fees vary depending on the class of premises (e.g., betting shop and casino will pay different fees as they are each in a different class of premises)
Don't know	Does not outline fees	We have amended the draft policy to provide a link to the Council website where the fees can be viewed
No	All premises should be £10,000 per annum including reinstatement of license.	We have amended the policy to explain that the Government set the maximum fee the Council is allowed to charge for each type of application and for each annual fee.
No	I think you need to consider an ongoing fee should the license be granted. We have far too many gambling shops in	A premises licence holder is already required pay an annual fee to the licensing authority within 30 days of

Answer	Additional comments	We said
	<p>Lewisham Centre. They are not well regulated and policed, we do not need this amount - it is exploitative of our community. They should be made to contribute a portion of their profits to Lewisham Council to spend on helping the people who use them regularly.</p>	<p>the licence being granted, and annually thereafter.</p> <p>The Council does not have any powers to increase the fee above the permitted maximum amount, or to raise additional income from the gambling operator's profits.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>No</p>	<p>stop this gambling nonsense in the borough altogether</p>	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>No</p>	<p>we don't want gambling here</p>	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is</p>

Answer	Additional comments	We said
		<p>undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>No</p>	<p>Whatever the fees are they should increase by a factor of ten in order to support a policy of discouraging gambling across the borough</p>	<p>As mentioned above, the Government set the maximum fee the Council is allowed to charge for each type of application and for each annual fee.</p> <p>The Council does not have any powers to increase the fee above the permitted maximum amount.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>No</p>	<p>Where no representations have been made, I think there should be stronger onus on the council to determine if local residents and interested parties have actually been able to see the notice of licence.</p>	<p>As part of the application process for a licence, the Council's enforcement officers will visit the premises to ensure the notice has been prominently displayed as required by the legislation.</p> <p>When processing a recent application, officers determined that the notice was not prominently displayed and required the applicant to restart the process.</p>
<p>No</p>	<p>You do a disservice to your constituents.</p>	<p>We have noted this statement, but we are unable to consider this in</p>

Answer	Additional comments	We said
		relation to potential policy changes.

The Licensing Objectives

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

The Gambling Commission will take the lead role in keeping gambling crime-free. Our draft policy outlines how the Council will try to promote this with regard to the actual premises.

Do you feel the draft policy does enough to promote this objective? - If no, what changes do you think we should consider?

- Yes (9) (0 comment)
- No (14) (10 comments)
- Don't know (8) (3 comments)

Answer	Additional comments	We said
Don't know	<p>The information provided is not in a format that is accessible to me as a disabled person. This is a persistent and repeated occurrence on all Lewisham surveys I can recall completing.</p> <p>I am opposed to any and all gambling in Lewisham premises and land, including parks, including charitable fundraising.</p>	<p>We have reviewed the draft statement and increased the text contrast throughout the document to make the text easier to read.</p> <p>We have also reformatted the tables in Appendix 5 to remove accessibility issues and enable people to access the information using a screen reader.</p> <p>As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to</p>

Answer	Additional comments	We said
		this effect within the draft Statement.
Don't know	Keep them out of the borough. In richer parts of London, you don't see so many so why overload them in poor areas?	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
Don't know	I don't believe this is being complied with on Deptford High Street - I think the wording is fine but I don't think the council are upholding this in relation to Deptford High Street. If a policy does not deliver what it says it will - it is just a piece of paper.	<p>The respondent has not provided any evidence in relation to non-compliance in Deptford High Street.</p> <p>The Licensing Strand investigates all complaints in relation to licensed and unlicensed gambling activity, liaises closely with the Gambling Commission, and has taken appropriate enforcement action when required.</p> <p>The Licensing Strand has not received any complaints in respect of premises failing to uphold this objective within this area.</p>

Answer	Additional comments	We said
<p style="text-align: center;">No</p>	<p>4.2. This needs to be stronger and set more challenging conditions to discourage gambling premises.</p>	<p>As mentioned above, The licensing authority has a statutory duty to aim to permit gambling and not to discourage it.</p> <p>As mentioned in the preliminary text to this question, the Gambling Commission will take the lead role in keeping gambling crime-free.</p> <p>Before machining an application for a premises licence, all operators must first obtain an operators licence issued by the Commission.</p> <p>When the Commission assess an application for an operator’s licence, they consider whether the business will uphold the licensing objectives and if they are suitable to carry out the activities their licence will allow.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p style="text-align: center;">No</p>	<p>Expand on this to make the establishment responsible for loitering outside of the premises to deter harassment of the public.</p>	<p>Operators are not responsible for the behaviour of people outside the premises.</p> <p>If such people are harassing members of the public, this would be a matter for the police and</p>

Answer	Additional comments	We said
		is not a matter this policy can address.
No	If gambling causes crime, then why is it permitted.	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	we don't want gambling here	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	Looks only at the individual application rather than putting the application in the context of the wider licences	As mentioned above, the licensing authority is required to consider all applications on their individual merits.

Answer	Additional comments	We said
	already granted in any given area.	For this reason, we have not made any changes to this effect within the draft Statement.
No	No because it should be underpinned by a statement that gambling should be discouraged wherever possible. It's like smoking. It's legal but it's harmful and official policy is to discourage it	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	Opening hours and other gambling premises close by	<p>The opening hours of all classes of gambling premises are set by default conditions and Part B of the draft policy already includes this as a consideration when determining a licence application.</p> <p>If the local authority may exclude the default conditions require reduced hours if necessary to uphold the licensing objectives.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>

Answer	Additional comments	We said
<p>No</p>	<p>Shouldn't there be something about the number of premises in a particular area and this being a factor. That the Authority should consider the effect of multiple premises acting as a draw for various forms of crime?</p>	<p>As mentioned above, the Licensing Authority is unable to create a 'cumulative impact area' to enable us to restrict the distance between gambling premises solely because there are already too many premises in a particular area.</p> <p>Decision makers are required to determine each gambling application on its individual merits and the draft policy enables the licensing authority to do this.</p> <p>The licensing authority would be unable to set an arbitrary distance between premises or refuse an application due to the close proximity of other gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>No</p>	<p>There is no mention of addiction to gambling. NHS costs £1.27billion.</p>	<p>We have also had regard to statement published by the Gambling Commission CEO on 14 August 2023 regarding the increase and misuse of statistics around gambling.</p> <p>We recognise that during the life of this policy, gambling statistics may be updated, and any use of current or outdated</p>

Answer	Additional comments	We said
		<p>statistics could become misleading. For these reasons we have removed references to statistical data within this policy. (See amended paragraphs 2.3 and 2.4).</p>
<p>No</p>	<p>While the policy is a move in the right direction, especially location of premises next to vulnerable people - hostels etc. The simple issue is that it will do nothing to retrospectively apply these rules to premises in operation. For example, St. Mungo's off Ennersdale road has a large population of vulnerable people, as well as a significant amount of hostels and HMOs in the area and the William Hill betting shop on Hither Green Lane is in very close proximity. The risks associated and posed by this establishment to vulnerable people is high. This combined with crime statistics for the area and the fact that St. Mungo's and other hostels do not engage with the community or walk around the area to ensure residents are not causing issues only exacerbates the issue.</p>	<p>As mentioned above, all operators must hold an operators licence issued by the Gambling Commission before they can apply for a premises licence.</p> <p>The operator's licence is issued subject to licence conditions and code of practice provisions.</p> <p>The Social Responsibility Code requires licensees to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures, and control measures to mitigate those risks. In making risk assessments, licensees must consider relevant matters identified in the licensing authority's statement of licensing policy.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>

The Licensing Objectives

OBJECTIVE 2: Ensuring gambling is conducted in a fair and open way.

The Gambling Commission will take the lead role in keeping gambling crime-free. Our draft policy outlines how the Council will try to promote this with regard to the actual premises.

Do you feel the draft policy does enough to promote this objective? - If no, what changes do you think we should consider?

- Yes (14) (0 comment)
- No (8) (5 comments)
- Don't know (9) (2 comments)

Answer	Additional comments	We said
Don't know	<p>The information provided is not in a format that is accessible to me as a disabled person. This is a persistent and repeated occurrence on all Lewisham surveys I can recall completing.</p> <p>I am opposed to any and all gambling in Lewisham premises and land, including parks, including charitable fundraising.</p>	<p>We have reviewed the draft statement and increased the text contrast throughout the document to make the text easier to read.</p> <p>We have also reformatted the tables in Appendix 5 to remove accessibility issues and enable people to access the information using a screen reader.</p> <p>As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to</p>

Answer	Additional comments	We said
		this effect within the draft Statement.
Don't know	Keep them out of the borough. In richer parts of London, you don't see so many so why overload them in poor areas?	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	Gambling and fair and open are not words that go together. Gambling should be banned.	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	Gambling is inherently unfair and a council objective saying otherwise is just words.	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based</p>

Answer	Additional comments	We said
		<p>on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>No</p>	<p>Once again, there is no recognition of addiction to gambling.</p>	<p>The draft policy recognises addiction at paragraphs 3.7, 6.1, 7.3, and 7.5.</p> <p>The Statement is not a mechanism for dealing with gambling addiction or problem gambling, but a tool to mitigate local risks on the licensing objectives.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>No</p>	<p>Everything is geared towards the interests of the gambling houses (as indeed are the odds in gambling generally). The policy should be against gambling</p>	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>

Answer	Additional comments	We said
<p style="text-align: center;">No</p>	<p>we don't want gambling here</p>	<p>As mentioned above, The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>

The Licensing Objectives

OBJECTIVE 3: Protecting Children and the Vulnerable from Harm.

The Council's draft policy states how it will protect children and vulnerable people from being harmed or exploited by gambling.

Do you feel the draft policy does enough to promote this objective? - If no, what changes do you think we should consider?

- Yes (12) (1 comment)
- No (13) (10 comments)
- Don't know (6) (2 comments)

Answer	Additional comments	We said
Don't know	<p>The information provided is not in a format that is accessible to me as a disabled person. This is a persistent and repeated occurrence on all Lewisham surveys I can recall completing.</p> <p>I am opposed to any and all gambling in Lewisham premises and land, including parks, including charitable fundraising.</p>	<p>We have reviewed the draft statement and increased the text contrast throughout the document to make the text easier to read.</p> <p>We have also reformatted the tables in Appendix 5 to remove accessibility issues and enable people to access the information using a screen reader.</p> <p>As mentioned above, an authority's decision cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>

Answer	Additional comments	We said
Don't know	Keep them out of the borough. In richer parts of London, you don't see so many so why overload them in poor areas?	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	A set of specific measures should be defined and outlined specifically for vulnerable adults in a similar way that attention has been paid to children, as this is an ongoing growing issue for Lewisham, particularly in central ward	<p>All measures with the draft policy apply equally to vulnerable adults and young persons.</p> <p>In addition to the policy, the Gambling Commissions Code of Practice Provisions at part 3, places specific requirements on operators in respect of vulnerable adults. Therefore, this does not require duplication within this policy.</p>
No	Absolutely not addressing the objective. Look at Deptford high street. There are gambling shops the entire length of the street. Children attending the schools in the middle of the street are exposed to gambling day in day out	The vicinity of one gambling premises to another and the fact that children and other vulnerable persons may pass such premises is not necessarily an indicator that they are exposed to gambling activity within those premises.

Answer	Additional comments	We said
		<p>The visibility and access to gambling premises and availability of gambling activity is restricted controlled by primary legislation, thereby mitigating the exposure to the gambling activity within.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>No</p>	<p>close these activities in the borough altogether</p>	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>No</p>	<p>Gambling especially problem gambling should be discussed at school (secondary school) as more awareness of addictive behaviour and how to seek help/self-exclude is important, especially due to the rise in online gambling.</p>	<p>We have noted this comment and are exploring the available options to deliver this.</p>

Answer	Additional comments	We said
<p>No</p>	<p>we don't want gambling here</p>	<p>As mentioned above, The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>No</p>	<p>Given the number of betting shops on Deptford High Steet, this is not being complied with. There are 2 x secondary schools, 3 x primary Schools, 3 x homeless projects and 1 x asylum seeker hotel all within 400 meters of the betting shops on Deptford Hight Street - with a request for a further one. This policy currently does not do enough and so this draft policy will also not be enough.</p>	<p>As mentioned above, the vicinity of one gambling premises to another and the fact that children and other vulnerable persons may pass such premises is not necessarily an indicator that they are exposed to gambling activity within those premises.</p> <p>The visibility and access to gambling premises and availability of gambling activity is restricted controlled by primary legislation, thereby mitigating the exposure to the gambling activity within.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>

Answer	Additional comments	We said
No	Insist on safeguarding vulnerable people training for staff. Consider the level of people under the influence who are vulnerable. Strict fines and checks in place so policies are actually followed,	<p>Regulations already exist that require licensees to have policies and procedures in place (including staff training) and to put them into effect.</p> <p>These provisions are contained in the Operator's Licence Conditions and Codes of Practice issued by the Gambling Commission.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	Outlaw gambling.	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
No	Those who are addicted to gambling live in the community and because of their debts their children and dependent relatives also live in	<p>We have noted this comment and recognise the issues raised.</p> <p>Organisations currently exist which are approved by the Gambling</p>

Answer	Additional comments	We said
	<p>poverty. How is a local authority expected to find those children and relatives?</p>	<p>Commission and deliver or support research into the prevention and treatment of gambling related harms as described in this comment.</p> <p>We are unable to use this Statement for this purpose.</p>
<p>No</p>	<p>While the policy is a move in the right direction, especially location of premises next to vulnerable people - hostels etc. The simple issue is that it will do nothing to retrospectively apply these rules to premises in operation. For example, St. Mungo's off Ennersdale road has a large population of vulnerable people, as well as a significant amount of hostels and HMOs in the area and the William Hill betting shop on Hither Green Lane is in very close proximity. The risks associated and posed by this establishment to vulnerable people is high. This combined with crime statistics for the area and the fact that St. Mungo's and other hostels do not engage with the community or walk around the area to ensure residents are not causing</p>	<p>We agree that retrospective action cannot be taken.</p> <p>Changes can only be made following a review of the licence which would usually arise following concerns regarding the operation of the premises.</p> <p>As mentioned above, The Commission's Social Responsibility Code requires licensees to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures, and control measures to mitigate those risks. In making risk assessments, licensees must consider relevant matters identified in the licensing authority's statement of licensing policy.</p> <p>For this reason, we have not made any changes to</p>

Answer	Additional comments	We said
	issues only exacerbates the issue.	this effect within the draft Statement.
Yes	Does the licensing authority provide a version of this document, or the survey, for vulnerable people?	Yes. We consulted groups representing vulnerable people and made this policy and survey available to them.

Other comments

If you have any other comments on Lewisham's draft policy, please tell us below.

- 18 Comments

Comment	We said
<p>From skim-reading Policy seems fine except for the typo(s).</p> <p>I would encourage Lewisham to support anything which deters gambling e.g., stop sports teams etc being sponsored by gambling organisations. Gambling is a life of misery for the individual and their families</p>	<p>The Gambling Act 2005 permits the advertising of gambling in all forms, provided that it is legal and there are adequate protections in place to prevent such advertisements undermining the licensing objectives.</p> <p>The Advertising Standards Authority (ASA) is the UK's independent regulator of advertising. It enforces the UK Advertising Codes (the Codes), written by the Committees of Advertising Practice.</p> <p>The Codes cover the content and placement of advertising and are designed to ensure that advertisements for gambling products are socially responsible, with particular regard to the need to protect children, young persons under 18 and other vulnerable persons from being harmed or exploited.</p> <p>The Codes also require that advertisements for gambling products or services do not mislead. Any complaint about the content and placement of advertising or marketing communications should be sent directly to the ASA.</p>
<p>Glad you are finally looking at this gambling issue in the borough. Close down all gambling premises and this exploitation of vulnerable people</p>	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p>

Comment	We said
	<p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>I believe we have more than enough gaming arcades and betting shops. I think there should be no more licences issued in Lewisham.</p>	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>I have not been personally affected; my family has. Gambling makes people rich by destroying lives. The lives of gamblers and their loved ones. It is insidious in how it reaches it people lives and present a vainer of glamour. It is dangerous and damaging industry like Tabaco. Banning it would not stop it and prompt organise crime. There is no need to support in by offering it space on LBL property and land.</p>	<p>We have noted this statement, but we are unable to consider this in relation to potential policy changes.</p>
<p>"I have not had the time to read through it all. I am sure it is all fine in principle and theory.</p> <p>It is the actual practice I am concerned about. This is because for all the long pages on your policy it is not what I witness as a community member of Lewisham Central.</p> <p>I think we have about 4 and my heart sinks every time I see a new one being unveiled with balloons outside etc.</p>	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>This means that premises licences will be granted but our policy aims to moderate the impact of gambling on the Borough, for example by attaching</p>

Comment	We said
<p>You do not see so many in affluent areas. Why?"</p>	<p>conditions to licences, rather than aiming to prevent it all together.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>I have recently made representation against the betting shop licence request for 80-82 Deptford High Street. I made one representation as a resident living very close by - I also made representation as a business owner - I am based at home as there is no office at our registered work premises (which is not in close proximity to Deptford High Street). This means that any business owner who works from home and is impacted by this betting shop is not able to make representation against it - I think this needs to be changed.</p>	<p>See paragraph 7.2 of the draft policy which sets out the definition of an interested party as defined in section 158 of the Gambling Act 2005.</p> <p>Paragraph 7.5 sets out the factors to be considered when determining whether a person lives sufficiently close to the premises to be likely to be impacted by the authorised activities.</p> <p>The list is not exhaustive, and proximity would be determined on the individual merits of the representation and other factors.</p> <p>The licensing authority did not reject any representation in respect of the application referred to in this comment, therefore all factors were considered, and the representation was accepted in the circumstances described and no change is therefor required.</p>
<p>It does feel that there is not much body to the enforcement aspect of the policy. Additionally, ongoing regular and random spot checks of premises and procedures?</p>	<p>The policy recognises that the licensing authority needs to be satisfied premises are being run in accordance with the provisions of the Act, the licensing objectives, the Licence Conditions and Codes of Practice issued by the Gambling Commission and any conditions attached to the Premises Licence.</p> <p>To achieve this, the licensing authority will inspect premises, look at gambling facilities, gaming machines, policies, and procedures, meet with licence holders and carry out general monitoring of areas, as necessary.</p>

Comment	We said
	In addition, the licensing authority will adopt a risk-based inspection programme
It's too difficult to read and understand, It would be useful to know how many people have read this and commented on it before a policy is adopted.	We have noted this statement, but we are unable to consider this in relation to potential policy changes.
Keep them out of the borough. In richer parts of London, you don't see so many so why overload them in poor areas?	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
Less gambling establishments and higher charges and fees for those profiting from the vulnerable and often disadvantaged members of our community while contributing to anti-social behaviour and negative mental health.	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
Lewisham are great at creating policies and strategies but unfortunately - when it comes to doing something about it i.e., enforcement, simply put - Lewisham Council fails miserably.	<p>The respondent has not provided any evidence in relation to gambling activity to support this comment.</p> <p>The Licensing Strand investigates all complaints in relation to licensed and unlicensed gambling activity, liaises closely with the Gambling Commission, and has taken appropriate enforcement action when required.</p>
No to all forms of gambling in the borough.	As mentioned above,

Comment	We said
	<p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>Not tough enough. Woolly language the Council can apply to suit its needs. No real desire to free people of this dreadful blight on vulnerable people's lives.</p>	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>Please please please get a grip on this and reduce the number of bookies etc in the high street in Deptford. Why would any area need more than one?</p>	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>Take another look and think about the bigger picture, the Borough that you're aspiring to create. Not only the individual application. Then, look at how the policy for the individual application needs to be adjusted with this context in mind.</p>	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling and must consider all applications on the individual merits of that application.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p>

Comment	We said
	<p>For this reason, we have not made any changes to this effect within the draft Statement.</p>
<p>The council really should have a Residents first attituded. From championing residents' issues to making consultation easier for the average resident to be able to respond to. The reading level of these documents should seriously be reviewed, and residents should be treated with respect.</p>	<p>As mentioned above,</p> <p>The licensing authority has a statutory duty to aim to allow gambling.</p> <p>An authority's decisions or policy cannot be based on need, a dislike of gambling, or a general notion that it is undesirable to allow gambling premises.</p> <p>We recognise the potential impact of gambling on the community, and through this policy, the licensing authority will seek to address the needs of residents to ensure a safe and healthy environment in which to live and work, together with safe and well-run gambling premises that will benefit the local economy.</p> <p>The licensing authority has sought to achieve a proper balance between implementing a responsible and consistent standard of regulation with minimizing the impact of regulation on businesses.</p>
<p>Why are there so many betting shops in Downham?</p>	<p>The Gambling Act 2005 places a legal duty on the Licensing Authority to aim to permit gambling in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives.</p> <p>The licensing authority is unable to refuse an application due to the close proximity of other gambling premises.</p> <p>This may result in several gambling premises being licensed in close proximity to one another.</p>

Other responses

In addition to the above comments received through the online consultation, we received one email in response to the consultation:

Comment	We said
<p>Further to the publication of your draft Gambling Policy 2023-2026, and the invitation to respond to the consultation, we wish to make the following comments.</p> <p>The Policy contains some statistics which we believe are either out of date, or misleading. These are the only points we wish to raise, and a very recent statement from the Gambling Commission should, in our opinion, be taken into consideration in relation to these points that are currently within the draft Policy.</p> <p>Andrew Rhodes, Chief Executive of the Gambling Commission, released a statement on 14th August 2023 which can be summarised by a small extract which reads “The Commission is very concerned at the significant increase in the misuse of statistics around gambling as different parties seek to make persuasive arguments for or against different proposals”.</p> <p>The full statement can be read using the following link: https://www.gamblingcommission.gov.uk/news/article/open-letter-from-commission-ceo-on-the-misuse-of-gambling-statistics</p> <p>Turning to your draft Policy, within the section relating to Licensing Objective 3 (Protecting children), the policy contains at paragraph 6.3 the statement “There is evidence that 16% of 11–15-year-olds spend their own money on gambling activity (Gambling Commission, 2016)”.</p> <p>Whilst this is quite outdated in any event, with numerous data on this topic published much more recently, I believe it is particularly misleading as a deeper look at the detail behind these numbers would reveal the following:</p> <p>“During that period, the most common types of gambling activity that young people spent their own money on were legal or did not feature age restricted products, namely:</p> <ul style="list-style-type: none">• playing arcade gaming machines such as penny pusher or claw grab machines	<p>We have amended the draft policy to incorporate the suggested changes as set out in the summary of changes document.</p>

Comment	We said
<ul style="list-style-type: none"> • placing a bet for money between friends or family • playing cards with friends or family for money” <p>This clearly puts a different perspective on the statement included within your policy, which would imply to most readers that these children were gambling in a way which was not legal, and the detail within the survey shows this to be untrue. It may be unwise to include these statistics in any event, given the policy is for 3 years and the figures are updated annually. But certainly, in view of the recent comments by the Gambling Commission, we would take the view that this statement should be removed from your draft policy.</p> <p>A further point we wish to raise falls within the section “Gambling Prevalence and Problem Gambling”.</p> <p>Paragraph 2.2 contains data relating to problem gambling levels from February 2018, already over 5 years out of date and up to 8 years out of date at the end of the period your policy will cover. Paragraph 2.7 contains estimates of numbers at risk of problem gambling, this having no reference point to the population or locality, but again these numbers will change on every new survey published, which will be at least annually. I am also informed that the Health Survey, which I believe this 2018 data is probably taken from, is soon to be abandoned by the Gambling Commission, and replaced with a new style of survey, which again would make these comments out-dated and less easily comparable to any new figures published.</p> <p>Problem gambling figures do appear to have fallen over recent years, so there is a significant danger of publishing mis-leading statistics if you did proceed to include these types of numbers, clearly contradicting this recent advice from the Gambling Commission. I would suggest the safest approach for a 3-year policy is to remove them, to avoid them being either out of date, or more importantly, potentially misleading.</p> <p>I hope you are able to take these comments into account when finalising your Gambling Policy.</p>	