

## MAYOR & CABINET

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| <b>Report Title</b> | Review of Statutory Gambling Statement of Principles  |                       |          |
| <b>Key Decision</b> |   |                       | Item No. |
| <b>Contributors</b> | Executive Director for Community Services, Executive Director for Resources and Regeneration, Head of Law |                       |          |
| <b>Class</b>        | Part 1  | Date: 16 January 2019 |          |

### 1. Purpose of Report

- 1.1 The Gambling Act 2005 provides Local Authorities with a duty to review its statement of licensing principles for premises licensed for gambling every three years. The Lewisham Gambling Policy was last reviewed in 2016.
- 1.2 The London Borough of Lewisham's ('the Licensing Authority') Statement of Licensing Policy for premises licensed for gambling sets out the issues which the Licensing Authority will take into consideration when determining Premises Licences and covers licensed premises throughout the Borough. When drawing up the Policy, the Licensing Authority has considered the wide range of premises that will be licensed, including casinos, amusement arcades, bingo halls, betting offices and alcohol-licensed premises.
- 1.3 The statement of licensing principles for premises licensed for gambling has been subject to necessary statutory public consultation during 10 October and 21 November 2018 in preparation for the revised policy to be published by the end of January 2019, thereby fulfilling the three years maximum lifespan.
- 1.4 Under the Gambling Act 2005, the Council has a duty to publish the policy it will adopt when it considers licensing applications from businesses that:
  - Require a premises licence to authorise the provision of gambling facilities
  - Require authorisation other than a premises licence including unlicensed Family Entertainment Centres, Gaming machines on alcohol licensed premises, Prize Gaming, Club Gaming and Club Gaming Machines
- 1.5 Whilst the licensing authority are permitted to authorise the provision of premises licences in relation to gambling premises, the Gambling Commission are responsible for the issuing of both the operators licence and the personal management licence.
- 1.6 The attached draft Gambling Statement in appendix 2 sets out the way in which Lewisham Licensing Authority will consider applications for such licences.

### 2 Recommendation

- 2.1 It is recommended that the Mayor and Cabinet agree that the Gambling Statement of principles for 2019-2022 should be presented to full Council for it to be formally determined and published.

### **3 Policy Context**

3.1 The Gambling Statement of principles assists the Council in meeting its priorities set within the Sustainable Community Strategy 2008-2020:

- making the borough 'safer' and taking actions to meet the Safer Lewisham Partnership Priorities.
- Healthy, active and enjoyable and taking actions to meet the Health and Wellbeing Board Priorities.
- Dynamic and Prosperous to increase and improve the vitality and quality of town centres and localities.

3.2 This Gambling Statement also specifically supports the following Council's Corporate Priorities:

- *Safety, Security & Visible Presence* – Improving partnership working with the police and others and using the Council's powers to combat crime, the fear of crime and anti-social behaviour
- *Strengthening The Local Economy* – Gaining resources to regenerate key localities, strengthen employment skills and promote public transport

3.3 Paragraph 4.2 (a) of Article 4 of the Council's Constitution confirms that the Licensing Statement (Gambling) is a policy which, when adopted by members at Full Council, will make up the Council's policy framework.

### **4. Purpose of the Statement**

4.1 This policy statement has five main objectives:

1. To reinforce to elected Members on the Licensing Committee the powers and constraints placed upon the local authority as licensing authority by the Gambling Act 2005.
2. To set out, for the benefit of prospective applicants, responsible authorities, local residents and premises licensed for gambling, the parameters under which this authority will make its licensing decisions.
3. To inform prospective licensees of premises licensed for gambling how a licensed premises is likely to be able to operate within an area.
4. To inform local residents and licensees of premises licensed for gambling how their needs will be addressed.
5. To minimise the number of licensing decisions that may be challenged in a court of law.

4.2 Scope of the Policy: The Gambling Act 2005 regulates the following activities:

- Adult Gaming Centres (for Category B3, B4, C and D machines)
- Family Entertainment Centres (for Category C and D machines).
- The Licensing Authority may also issue Family Entertainment Centres Gaming Machine Permits that authorise the use of Category D machines only.
- Casino Premises
- Bingo Premises
- Betting Premises, including race tracks used by betting intermediaries

4.3 Forms of authorisations other than Premises Licenses are as follows:

- Unlicensed Family Entertainment Centres
- Gaming machines on alcohol-licensed premises
- Prize Gaming
- Club Gaming
- Club Gaming Machines

#### 4.4 Key Principles of the Policy:

- The policy recognises the increasing awareness within gambling facilities to promote social responsibility as a means of challenging problem gambling which in turn reduces the likelihood of crime and disorder in the premises and within the locality of the premises.
- The policy provides a regulatory framework for gambling, which reflects the needs of our local communities and empowers local authorities to make and enforce decisions about the most appropriate licensing strategies for their local area.
- The policy encourages greater community involvement in licensing decisions and gives local residents the opportunity to have their say regarding licensing decisions that may affect them.
- Each licence application will be considered on its own merits in the context of the three licensing objectives set out below paragraph 4.6 in addition to the operator's ability to satisfy identified local risks via the production of a local risk assessment.

#### 4.5 Types of Authorisation: The types of authorisation that can be applied for:

- **Premises licences:** to use a premises for the provision of gambling
- **Unlicensed Family Entertainment Centre gaming machine permits:** Where a premises does not hold a premises licence but wishes to provide gaming machines it must apply to the local authority for this permit.
- **(Alcohol) Licensed premises gaming machine permits:**
- Licensed premises selling alcohol for consumption on the premises can automatically have 2 gaming machines of category C and or D
- **Prize Gaming Permits**
- **Club Gaming and Club Machines Permits:** Provide three gaming machines (B, C or D) equal chance gaming or games of chance.
- **Temporary Use Notices:** Use of the premises for gambling where there is no premises licence but the gambling operator wishes to use the premises temporarily to provide facilities for gambling
- **Occasional Use Notices:** Authorised to carry out for eight days in a calendar year.

#### 4.6 The Licensing Objectives

- In carrying out its licensing functions, the Council will promote the three licensing objectives set out in the Gambling Act 2005. They are:
- To prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- To ensuring that gambling is conducted in a fair and open way
- To protect children and other vulnerable persons from being harmed or exploited by gambling

- 4.6.1 Unlike the Licensing Act 2003, whereby equal importance is given to all four of its licensing objectives, the Gambling Commission has advised that licensing authorities are best placed to protect children and other vulnerable persons from being harmed or exploited by gambling.
- 4.6.2 The licensing authority has noted the Gambling Commission's Guidance that this objective means preventing children from taking part in gambling (as well as the restriction of advertising so that gambling products are not aimed at or are, particularly attractive to children).

## **5 Review of Lewisham's Gambling Policy**

- 5.1 Section 349 of the Gambling Act 2005 requires all licensing authorities to prepare and publish a statement of licensing principles that they propose to apply in exercising their functions under the Act, commonly known as a policy statement. The policy statement forms the licensing authority's mandate for managing local gambling provision and sets out how the licensing authority views the local risk environment and therefore its expectations in relation to operators with premises in the locality.
- 5.2 The policy statement can be reviewed and revised by the licensing authority at any time but as a minimum this must be done every 3 years.
- 5.3 Lewisham's existing gambling Policy 2016-2019 was signed off in February 2016.
- 5.4 The licensing authority's policy statement will have effect for a maximum of three years and must be reviewed thereafter. The statutory deadline as set out in the Act for the commencement of the revised policy is the 31 January of the year it is due.
- 5.5 Section 349 of the Gambling Act requires licensing authorities to consult with the following on their policy statement or any subsequent revision:
- in England and Wales, the chief officer of police for the authority's area;
  - one or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority's area;
  - one or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority's functions under the Act.
- 5.6 In line with statutory requirements, Lewisham's Licensing Authority published its revised version of the Gambling Policy for 2019-22 which went out to public consultation for 6 weeks on 10 October 2018 and closed on 21 November 2018.
- 5.7 The consultation was advertised on the Lewisham council website and sent to all consultees on the consultee list (see 4.8 below). Additionally a newspaper advert was also published in the Lewisham & Catford News shopper on 24 October 2018 and a public notice was also advertised outside the Civic Suite in line with the Gambling Act 2005 consultation regulations.

5.8 Where the policy statement is reviewed and changes proposed, licensing authorities must consult on the revision. Authorities only need to consult on the revision made to the policy, not the whole body of the policy statement. However for completeness and transparency, Lewisham's Licensing Authority has published the full body of the revised policy.

5.9 The following list of consultees will be directed contacted for feedback on these revisions to the policy:

- Lewisham Police – Borough Commander and Licensing Officer
- London Fire Brigade
- LBL Environmental Health
- LBL Planning Authority
- LBL Safeguarding Children's Board
- LBL Safeguarding Adult's Board
- LBL Children's Services
- LBL Public Health Board
- HM Revenue and Customs
- Gambling Commission
- Lewisham Elected Councillors
- Lewisham MPs
- Greater London Authority Members
- Lewisham Council Directors
- London Borough of Southwark - Licensing Authority & Chief Executive
- London Borough of Bromley - Licensing Authority & Chief Executive
- London Borough of Croydon - Licensing Authority & Chief Executive
- Royal Borough of Greenwich - Licensing Authority & Chief Executive
- All Gambling Premises in the Borough
- GamCare
- Age Concern Lewisham
- CGL Lewisham
- LBL Prevention and Inclusion Team
- Safer London
- Lewisham Disability Coalition
- Lewisham Irish Centre
- Citizens Advice Bureau
- Lewisham Victim Support
- Refuge
- Lewisham Faith Groups
- NSPCC South London
- Metro Centre Greenwich
- Samaritans Lewisham
- 2000 Community Action Centre
- New Cross Betwatch
- Local Assemblies
- Betfred – Head Office
- William Hill – Head Office
- Ladbrookes – Head Office
- Coral – Head Office

## 6. Consultation Response

- 6.1 The consultation received 17 responses online from members of the public, of which 8 gave a written response which is outlined in appendix 1.
- 6.2 Overall, these responses took a negative view of the gambling industry and the presence of gambling premises in the borough. Many raised concerns around the negative impact of gambling on the vulnerable and on society as a whole.
- 6.3 Further responses were received from the following statutory and non-statutory bodies:

| Organisation        | Feedback  |
|---------------------|---|
| Metropolitan Police | Satisfied with the revised statement  |
| Gambling Commission | Recommended to the licensing authority that it considers including a requirement for premises to keep a copy of risk assessments on the premises for inspection by authorised officers.   |
| GamCare             | <p>Urged the licensing authority to:</p> <ul style="list-style-type: none"><li>• Develop a risk map of your local area so that the authority is aware of both potential and actual risks around gambling venues.</li><li>• Consider that proposals for new gambling premises which are near hostels or other accommodation or centres catering for vulnerable people, including those with learning difficulties, and those with gambling / alcohol / drug abuse problems, as likely to adversely affect the licensing objectives set out by the Gambling Commission. This is also relevant regarding the proximity to schools, colleges and universities.</li><li>• Ensure operators develop detailed local risk assessments at each gambling venue – pertinent to the environment immediately surrounding the premises as well as the wider local area to ensure operators and staff teams are fully aware of the challenges present in the local area and can help reassure the Local Licensing Authority that appropriate mitigations are in place.</li><li>• Consider whether operators training programmes ensure staff can identify children and other vulnerable people, and take appropriate action to ensure they are not able to access the premises or are supported appropriately</li><li>• Consider operator's staffing numbers key points throughout the day</li><li>• Consider whether the layout, lighting and fitting out of the premises have been designed so as not to attract children and other vulnerable persons who might be harmed or exploited by gambling.</li></ul> |

|                   |  |
|-------------------|--|
|                   | <ul style="list-style-type: none"> <li>• Consider whether any promotional material associated with the premises could encourage the use of the premises by children or young people if they are not legally allowed to do so.</li> </ul>   |
| LBL Public Health | <p>Advised the Licensing Authority to consider the following:</p> <ul style="list-style-type: none"> <li>• Include of data in section 1 on local levels of deprivation in the borough and/or any health related data on conditions linked to problem gambling e.g. depression/anxiety, substance misuse.</li> <li>• In Section 3 of the policy, in the consideration of applications section, consider the following factors listed: <ul style="list-style-type: none"> <li>- proximity to other gambling establishments</li> <li>- application in an area of high deprivation</li> <li>- proximity to schools, <b>particularly where they are within a 400 meter radius</b></li> </ul> </li> <li>• Proximity to schools has been listed already but could be strengthened by adding in the 400m radius, which has been suggested in other local authorities (Barking and Dagenham) and is a standard being used in the schools superzones work which Public Health. There is evidence that 16% of 11-15 year olds spend their own money on gambling activity (Gambling Commission, 2016), which we would hope to bear in mind when considering applications locally that are in close proximity to schools (and even youth services).</li> <li>• The other suggestions are based on evidence that there are twice as many fixed odds betting terminals in the country's 55 most deprived areas as there are in the richest 115 districts, with the same pattern being visible in London. This suggests potential clustering with deprivation, which could exacerbate any problem gambling in those areas.</li> <li>• Consider developing a scoring system for risk of gambling-related harm in terms of applications received. A similar tool currently used by Public Health to assess alcohol licence applications. This would help identify if an application is being made in a high risk area thus requiring additional mitigations/conditions.</li> </ul> |

## 7. Changes to Policy Statement

7.1 The following revisions were made before consultation on the policy:

- Further information around 'character of the borough'.
- Further clarity around local area profiles and local risk assessments; what is required of applicants and how to use area profiles; actions the council may take if we deem risk assessment not sufficient.

- Inclusion of model conditions that operators can draw upon when applying for premises licences / can be used by committee where objections are made.
- Addition of classification of gaming machines in appendix.

7.2 Following a review of the consultation responses, it was decided that a number of areas needed further amendments to strengthen the policy around ensuring the licensing objectives were met, specifically in relation to ‘protecting children and other vulnerable persons from being harmed or exploited by gambling’.

7.3 As a result, the following further amendments were made post consultation:

1. Additional information on population and deprivation in section 4 – Characteristics of the borough (moved to new separate section titled ‘Overview of Considerations for Licensing Authority’)
2. Further clarity around enforcement and the Licensing Authority’s approach to achieving compliance.
3. Addition of section 12 Part A ‘duplication with other regulatory regimes’.
4. Introduction of new Part B ‘Overview of Considerations for Licensing Authority’ which includes the following:
  - Detail on the boroughs characteristics with reference to areas of deprivation;
  - Addition of section 2 Part B ‘Gambling Prevalence and Problem Gambling’, summarising concerns around gambling related harm and gambling as a public health issue. This section outlines a number of expectations the Licensing authority has of operators to mitigate negative impact of gambling on the local communities within which they are based;
  - Further clarity around risk assessments and what is expected of operators, with a specific reference to the premises proximity to schools and to those within a 400m radius of a school. Additionally, it is stated that applicants/operators are required to keep a copy of the local area risk assessment on the licensed premises and to ensure that all staff have seen the risk assessment, have received training in respect of its content, and are able to produce the risk assessment on request by an authorised officer;
  - Addition of ‘Licensing Objectives’ outline and what the licensing authority will be considering when ensuring that applicants meet the requirements of the licensing objectives, with specific reference to schools and the 400m radius proximity.
5. Further clarity around split premises and premises plans in Premises Licence section.
6. Introduction of ‘general requirements for all’ section again further clarifying expectations of operators to better manage risks around licensing objectives.
7. Further information provided around betting premises.
8. Additional requirement for applicants for Unlicensed Family Entertainment Centre Permits to have a recent Disclosure and Barring Service check, as well as appropriate policies and procedures in place to protect children and vulnerable people from harm.
9. Addition of section ‘Small society lotteries’ and details around what is expected.



10. Removal of appendix 2 Classification of Gaming Machines stakes and prizes, as advised by the Gambling Commission as these are subject to change throughout the 3 year life of the Statement of Gambling principles.
11. Addition of appendix with full details of consultation process undertaken, as advised by Gambling Commission.
12. Addition of appendix – glossary of terms.

7.3. By making the above revisions, the licensing authority is satisfied that it has addressed the feedback from both statutory and non-statutory consultees to include more detail around expectations of operators to undertake actions to mitigate negative impact on vulnerable groups, as well as to provide a more robust framework within which licensing applications can be considered to again ensure that negative impact on licensing objectives can be identified and addressed before the licence is granted.

7.4. Specific reference has been made to proximity to schools and advice taken from public health on referencing the 400m radius 'superzone' around the school has been included. This will ensure greater weight to its importance when considering applications for new premises licences or variations to premises licences. Additionally, clear expectations have been set out around risk assessments that operators are required to complete and the areas the licensing authority expects the operators to consider and address. Greater emphasis on staff training, staff numbers and actively identifying and protecting the vulnerable is now included in the statement, as well as the requirement to keep these assessments on the premises so that staff can easily access them as well be available for inspection by council and police officers.

## **8 Financial Implications**

8.1 The delivery of a comprehensive Gambling Act policy and service is critical to businesses and residents. Costs incurred through enforcement activity and court action is necessary on occasion and decisions will be taken in line with the Council agreed Enforcement policy. The Service budgets for this action, but there may be occasions where legal costs will be greater than predicted and decisions will be taken as appropriate on a case by case basis.

## **9. Equalities Implications**

9.1 Developing safe and secure communities is central to the work of the Council as a whole. Reducing and preventing crime, reducing fear of crime and supporting vulnerable communities is critical to the wellbeing of all our citizens, alongside fair and proportionate approach with businesses. The statement attempts to strengthen the licensing authorities ability to protect vulnerable groups such as young people and vulnerable individuals, from the negative impacts of Gambling on their wellbeing.

## **10. Crime and Disorder Implications**

10.1 Section 17 Crime and Disorder Act 1998 places a duty on partners to do all they can to reasonably prevent crime and disorder in their area. The level of crime and its impact is influenced by the decisions and activities taken in the day-to-day of local bodies and organisations. The responsible authorities are required to provide a range of services in their community from policing, fire protection,

planning, consumer and environmental protection, transport and highways. They each have a key statutory role in providing these services and, in carrying out their core activities, can significantly contribute to reducing crime and improving the quality of life in their area.

- 10.2 Crime and disorder and nuisance issues may arise around licensed premises or can be caused by unlicensed activity. As outlined in the Statement of principles for Gambling document, enforcement is a priority for the licensing authority where it identifies to concerns, and it has a range of tools at its disposal to address those concerns. Additionally. The police are a responsible authority and can object to licence applications where there are identified crime and disorder issues, and can also work with the licensing authority to undertake enforcement action where required.
- 10.3 Where there are complaints of crime, disorder or nuisance issues related to either licenced or unlicensed premises, the licensing authority will investigate working with the Police Licensing officer. Where problems can be evidenced, this can result in objections to any further licence application at point of renewal, or prosecution for unlicensed activity. Other powers could also be used to address unlicensed activity, such as closure orders under the Anti-Social Behaviour, Crime and Policing Act 2014.

## **11. Legal & Human Rights Implications**

- 11.1 Section 349 of the Gambling Act 2005 requires the Licensing Authority to prepare and publish a Statement of Gambling Licensing Policy every 3 years. The next Statement must be published by 31 January 2019.
- 11.2 Licensing Section 25 of the Gambling Act 2005 requires the Authority to have regard to the Gambling Commission's Guidance when preparing its Policy.
- 11.3 Any other legal implications relating to the Statement of Gambling Licensing Policy are detailed within the 2005 Act.
- 11.4 Part 1A of the Local Government Act 2000, provides that the functions of a local authority in England operating executive functions (in the form of an elected mayor and cabinet) must be discharged by the executive unless those functions are specified not to be the responsibility of the authority's executive by virtue of regulations. The Local Authorities (Functions and Responsibilities) (England) Regulations 2000, as amended by 2004 Regulations (2004/2748), provide that the power to determine and publish a licensing authority statement of policy is not an executive function, but is instead a matter only for the Council.
- 11.5 The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 11.6 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.

11.7 The duty continues to be a “have regard duty”, and the weight to be attached to it is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.

11.8 The Equality and Human Rights Commission has recently 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:  
<http://equalityhumanrights.com/legal-and-policy/equality-act/equalityact-codes-of-practice-and-technical-guidance/>

11.9 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:

1. The essential guide to the public sector equality duty
2. Meeting the equality duty in policy and decision-making
3. Engagement and the equality duty
4. Equality objectives and the equality duty
5. Equality information and the equality duty

11.10 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. 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:  
<http://www.equalityhumanrights.com/advice-and-guidance/publicsector-equality-duty/guidance-on-the-equality-duty/>

11.11 Licensing Authorities, as defined by the Licensing Act 2003, s.3 (1) are public authorities for the purposes of the Human Rights Act 1998. Accordingly, they are under a duty to act compatibly with Convention rights in the exercise of their functions.

11.12 The current draft Statement of Gambling Licensing Policy has been considered by external Counsel to ensure that it fulfils the licensing authority's statutory obligations.

## **12. Environmental Implications**

12.1 The Council's lead officer for environmental matters is an advisor to the Safer Lewisham Partnership and makes representations as appropriate in relation to impact. Environmental services are consulted about all agreed activity before proceeding.

## **13. Summary**

13.1 The Licensing authority is required under the Gambling Act 2005 to produce a statement of principles that outlines how the licensing authority will deal with applications for licensing gambling premises and issues related gambling permits and notices. The licensing authority is required to review this statement of principles every 3 years.

13.2 It must do this by consulting with:

- in England and Wales, the chief officer of police for the authority's area;
- one or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority's area;
- one or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority's functions under the Act.

13.3 A revised draft was published on 21 October 2018 and a consultation took place over 6 week period.

13.4 Following responses from the public and statutory and not statutory consultees, several further revisions were made. These included providing more clarity around particular sections but also the addition of specific requirements of operators to undertake actions that would mitigate negative impact on vulnerable groups in the borough such as young people and those with either addiction or homelessness problems.

## Appendix 1 – Written Consultation Responses

I strongly object to the proliferation of Betting Shops on our streets. They are a blight. They impoverish the vulnerable, and Lewisham Council should use every possible power it has to block the opening of any more premises and to close existing premises

2.15 No entrance to a casino must be from premises that are used wholly or mainly by children and/or young persons.

I believe this precept should be strengthened so that no access to a casino is allowed from premises that are used by children and young people.

No comments.

It is my personal belief that gambling establishments take advantage of the impoverished and underemployed. I am a resident of Lewisham central ward. There are too many gambling halls in the area. There should be some restriction to the the number of licences allowed in an area meaning that there are too many and they are too close together. There should be limits in place preventing 24 hour operation as it only seems to attract unsavoury persons to the area.

Betting shops do not improve our local environment. They often feed on the most vulnerable people causing addictive behaviour which then feeds poverty and crime.

There should be a stipulation that where there is one betting shop then there cannot be a second within 500m.

I must also declare that I am not impartial.

As a child we often went hungry as my father would often lose his money at the dogs.

As a grown up I have seen my brother lose over £100k to bookies. He has now had to sell his house.

I have a nephew who has lost many thousands over several years.

Betting shops bring nothing but poverty and sadness to the most desperate.

The gambling industry is spoiling many live. I have been convinced for many years that it needs much tighter legislation, not least in thr number of beting shops in any location.

I am a proud resident of Brockley, SE4 and immensely supportive of local businesses and the high streets. The presents of gambling establishments is destructive to the overall environment of the high street. Betting and gambling shops litter most high streets in Lewisham and hinder the growth of community owned and supported shops. They are anti-social. As a woman, I often feel threatened by some of the congregants in front of the betting shops in my area.

In future, please oppose any expansion of gambling or betting in store fronts in Lewisham. As a community, we are being offered an incredible moment to ensure the survival of small, family owned shops in Lewisham driven by high street commerce from all members of the community. The presence and, especially the expansion, of betting shops in the area threatens the sustainability of our very important local high street shops.

Please do everything in your power to limit the gambling and betting shops in our community.

I wholeheartedly object to gambling shops in lewisham.

Although many can gamble responsibly, the proliferation of fixed odds machines and the sheer volume of shops encourage and enable gambling amongst the most vulnerable. We have a duty to protect this demographic within our society.

Additionally they prevent access to retail spaces for small and local business, stifling development and a sense of community spirit within neighbourhoods.

They also bring an associated problems of social disorder, littering and alcohol consumption. Studies have shown a strong correlation between the poor health of high streets and the concentration of gambling shops.

In summary, they damage social structures, encourage anti social behaviour and stymie growth of other business and a sense of place within the community.

There are too many gambling establishments in the area taking advantage of those who are gullible and do not have the money to lose. How does this document address this?

Appendix 2

Version 5 LBL Statement of Principles for Gambling – see attached document