

Appendix C - Summary of Consultation Responses

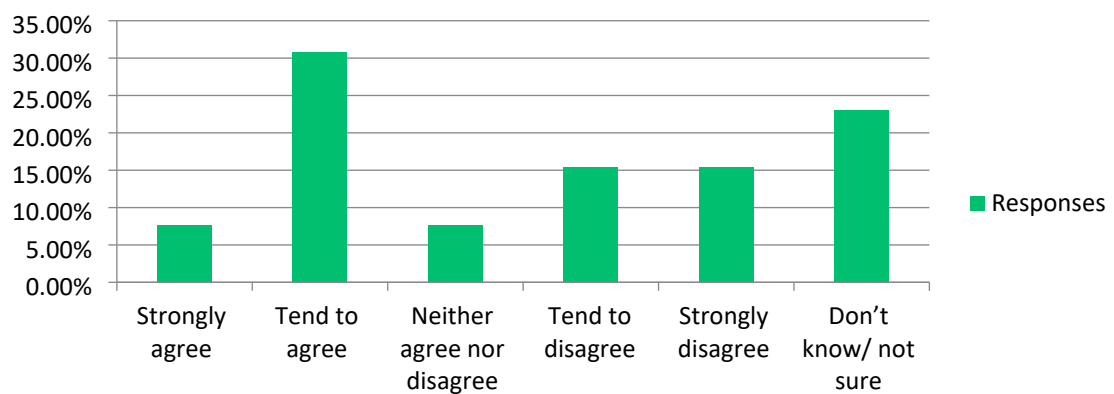
Question 1 - Overall, to what extent do you agree or disagree with the draft statement of gambling principles? (Please tick one option)

Q1 Results

Answer Choices	Responses	
Strongly agree	12.50%	1
Tend to agree	25.00%	4
Neither agree nor disagree	0.00%	1
Tend to disagree	12.50%	2
Strongly disagree	25.00%	2
Don't know/ not sure	25.00%	3

Answered	13
Skipped	1

Overall, to what extent do you agree or disagree with the draft statement of gambling principles? (Please tick one option)



Summary

38.46% (5) of respondents disagreed with the proposed statement of principles, 38.46% (5) of respondents agreed with the proposed statement of principles, 7.69% (1) respondents neither agree or disagree and 23.08% of respondents are unsure/don't know.

**Question 2 - Please give reasons for your answer: (Please type in your answer)
(Answer to Q1 - Strongly Agree or Agree)**

Q2 Results

Answered	5
Skipped	9

Responses and LA Comments

Of the 5 responses 4 provided the following reason for their Question 1 Answer:

	Consultation Responses	Licensing Comments
1	It sounds like you don't really approve of encouraging gambling. Neither do I. These slot machines places don't do anything to enhance areas of Barnet and may encourage people to start gambling.	The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting crime activities. No amendments required to the proposed Statement of Principles.
2	It is good that you have added an impact assessment and a map.	No amendments required to the proposed Statement of Principles.
3	My high street Vivian Avenue has multiple betting shops and its attracting the criminal element, who sit around all in the near by cafes.	The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting crime activities. No amendments required to the proposed Statement of Principles.
4	test	N/A
5	The introduction of gambling vulnerability zones is a significant change and forces applicants, residents and the committee to consider each permit in relation to its broader surroundings. This is long overdue.	No amendments required to the proposed Statement of Principles.

**Question 3 - Please give reasons for your answer: (Please type in your answer)
(Answer to Q1 - Neither agree or disagree)**

Q3 Results

Answered	3
Skipped	11

Responses
and LA
Comments

	Consultation Responses	Licensing Comments
1	The question was a bit wishy-washy. Hence you get a wishy-washy answer. I do not like gambling or slots machines shops. Period.	The Gambling Act 2005 does not allow the Licensing Authority to prevent applications for Gambling Premises Licences being made. No amendments required to the proposed Statement of Principles.
2	These betting shops have made the high street a run down and intimidating area. As a women, walking from home, I am regularly hassled by beggars, who go in and out of these betting shops.	The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting criminal activities. No amendments required to the proposed Statement of Principles.
3	I agree with elements such as the resolution not to issue casino licences. It is also very helpful, and fairly upsetting, to see the local maps and density of gambling premises. I do, however, believe that an important factor in protecting children and therefore an extremely relevant factor in assessing whether the issuing of a licence is harmful to children is to consider the number of licensed gambling premises already in the location. In Finchley Central there is such a high density of gambling premises that children going to school along Ballards Lane have to go past many such premises, with betting being visibly on display in some of these premises. The result is also the absence of a normally	The Gambling Act 2005 does not allow the Licensing Authority to prevent applications for Gambling Premises Licences being made. No amendments required to the proposed Statement of Principles.

	<p>functioning high street with a variety of shops. One of the key places where they wait for buses and go to the Tube is surrounded by betting shops. Yet all we seem to see is additional premises being licensed. With the recent extension of Merkur Slots' licensed hours, the potential impact if that is enacted will be that children will have to go past those open premises on their way to school as well. This experience must impact all those children and I believe there has to be a limit to the density of gambling premises in order to protect children, a density which has been exceeded significantly already. I note, for example, that Lewisham refused an application by Merkur Slots to extend the licensed hours to 24 hours. Instead they agreed to 21 hours so that the premises would be closed when children were going to school, although please see my earlier comments as to there already being too high a density of licensed gambling premises.</p>	
<p>Summary</p>	<p>The Licensing Authority does not consider the consultation responses necessitate any amendment to the proposed Statement of Principles.</p>	

**Question 4 - Please give reasons for your answer: (Please type in your answer)
(Answer to Q1 - Disagree or Strongly disagree)**

Q4 Results

Answered	5
Skipped	9

Responses
and LA
Comments

	Consultation Responses	Licensing Comments
1	There is nothing of any good in gambling.	The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting crime activities. No amendments required to the proposed Statement of Principles.
2	Because I do not like gambling or slots machines premises in our high streets. They do nothing to enhance the neighbourhood. They encourage kids and young people to start gambling.	The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting crime activities. No amendments required to the proposed Statement of Principles.
3	Put simply, gambling should not be tolerated at all.	The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting crime activities. No amendments required to the proposed Statement of Principles.
4	The Statement of Principles primarily considers the impact of each gambling shop but does not sufficiently consider the combined impact of many such facilities on a single high street. For example, the south side of Ballards Lane from Finchley Central Station towards	The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting crime activities.

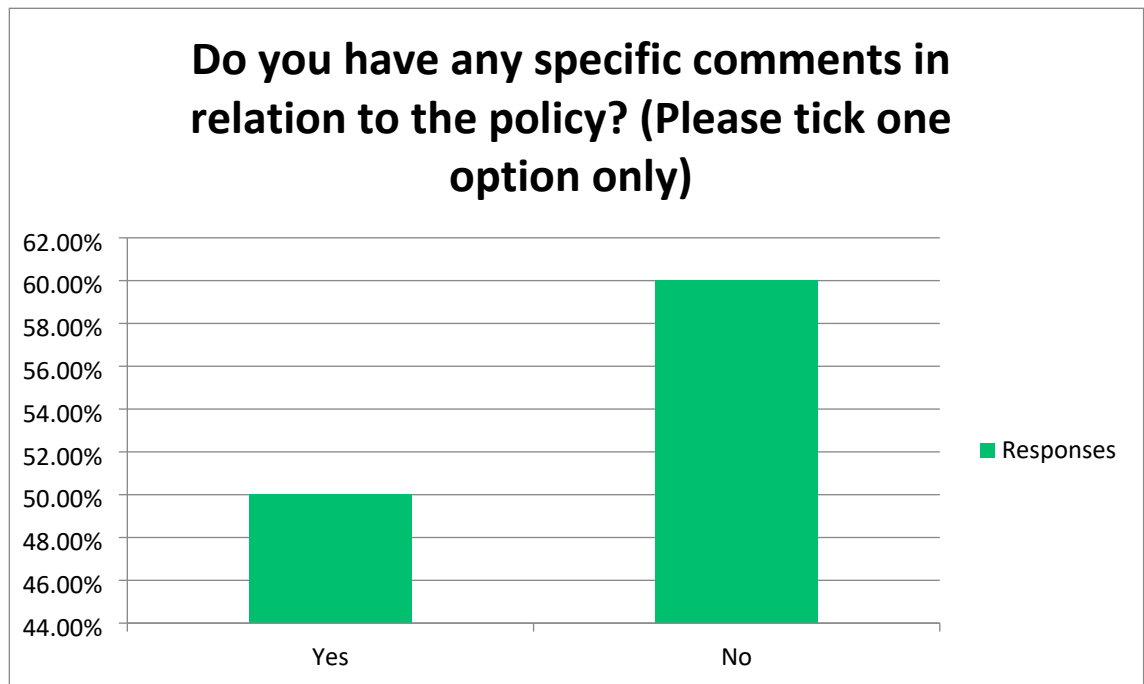
		<p>North Finchley has 4 gambling joints in the first 16 retail locations. The council has recently rubber stamped a request for one of these to operate 24/7. This section of the high street includes the pick up location for several school buses, a bus stop for public transport and the entrance to the underground station and so is filled with school children every morning and afternoon. These facilities support an insidious gambling-related infrastructure, including a pawn shop (Cash Convertors) on the same stretch of high street, plus two branches of Gamblers Anonymous which meet a few hundred meters away at St Mary's Church and at St Paul's Church. There seems to be no process for joining these dots to see the bigger picture. How many branches of Gambler's Anonymous will Finchley need before the number of gambling shops is considered too many?</p>	<p>The risk assessment submitted with each new application should seek to address issues such as the location of its premises to vulnerable groups and set out ways in which it can limit its potential negative impact upon an area.</p> <p>No amendments required to the proposed Statement of Principles.</p>
	5	I think the restrictions need to be more strict.	<p>The Gambling Act 2005 does not allow the Licensing Authority to prevent applications for Gambling Premises Licences being made.</p> <p>No amendments required to the proposed Statement of Principles.</p>
Summary	The Licensing Authority does not consider the consultation responses necessitate any amendment to the proposed Statement of Principles.		

Question 5 - Do you have any specific comments in relation to the policy? (Please tick one option only)

Q5 Results

Answer Choices	Responses	
Yes	50%	5
No	60%	6

Answered	10
Skipped	4



**Question 6 - Please give the paragraph number that you wish to make specific comments on (Q5):
(Please type in your answer).**

Q6 Results

Answered	3
Skipped	11

Responses
and LA
Comments

	Consultation Responses	Licensing Comments
1	I wish Barnet to be free of high St bookies and slot machines. The offer of good support for those addicted to online gambling too.	The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting crime activities. No amendments required to the proposed Statement of Principles.
2	You should not encourage gambling in any form. End of.	The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting crime activities. No amendments required to the proposed Statement of Principles.
3	I would like the another added to the policy at not more than one betting shop is allowing in a high street area	The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting crime activities. No amendments required to the proposed Statement of Principles.

Summary

The Licensing Authority does not consider the consultation responses necessitate any amendment to the proposed Statement of Principles.

Question 7 - What comments would you like to make (Q5): (Please type in your answer).

Q7 Results

Answered	3
Skipped	11

Responses and LA Comments

	Consultation Responses	Licensing Comments
1	I wish Barnet to be free of high St bookies and slot machines. The offer of good support for those addicted to online gambling too.	The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting crime activities. No amendments required to the proposed Statement of Principles.
2	You should not encourage gambling in any form. You should not allow licenses for slots machines premises in our high streets.	The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting crime activities. No amendments required to the proposed Statement of Principles.
3	It is good that you have a map but please bear in mind you have missed adjoining boroughs from your map. There is another gambling shop over the road in Harrow. You have missed slots off your map. There is silvertime on our side and harrow side that is missed off your map. You haven't included empty gambling shops. All that makes a great cumilative effect.	L B Barnet does not have jurisdiction over another local authority. However, will consider including adjoining streets from neighbouring boroughs into Local Area Plan when next reviewed. Unlike the Licensing Act, there is no provision for a cumulative impact zone for gambling.

Summary

The Licensing Authority does not consider the consultation responses necessitate any amendment to the proposed Statement of Principles.

Question 8 - Do you have other comments on actions that the council should consider in relation to its gambling policy? (Please type in your comments)

Q8 Results

Answered	6
Skipped	8

Responses and LA Comments

	Consultation Responses	Licensing Comments
1	No	No amendments required to the proposed Statement of Principles
2	It should consider just not encouraging or enabling gambling at all.	The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting crime activities. No amendments required to the proposed Statement of Principles.
3	Get Labour to return donations to their MPs from gambling companies!	No amendments required to the proposed Statement of Principles.
4	Yes, make the gambling outfits pay for upgrade of the area because as soon they arrive an area starts to downhill	The Gambling Act does not currently permit the local authority to charge gambling premises for the upgrading of any part of the borough. No amendments required to the proposed Statement of Principles.
5	The Statement of Principles primarily considers the impact of each gambling shop but does not sufficiently consider the combined impact of many such facilities on a single high street. For example, the south side of Ballards Lane from Finchley Central Station towards North Finchley has 4 gambling joints in the first 16 retail locations. The council has recently rubber stamped a request for one of these to operate 24/7. This section of the high street includes the pick up location for several school buses, a bus stop for public transport and the entrance to the underground station and so is filled with school	The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting crime activities. The risk assessment submitted with each new application should seek to address issues such as the location of its premises to vulnerable groups and set out ways in which it can limit its potential negative impact upon an area.

		<p>children every morning and afternoon. These facilities support an insidious gambling-related infrastructure, including a pawn shop (Cash Convertors) on the same stretch of high street, plus two branches of Gamblers Anonymous which meet a few hundred meters away at St Mary's Church and at St Paul's Church. There seems to be no process for joining these dots to see the bigger picture. How many branches of Gambler's Anonymous will Finchley need before the number of gambling shops is considered too many?</p>	<p>No amendments required to the proposed Statement of Principles.</p>
	6	<p>There are too many betting shops</p>	<p>The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting crime activities.</p> <p>No amendments required to the proposed Statement of Principles.</p>
<p>Summary</p>	<p>The Licensing Authority does not consider the consultation responses necessitate any amendment to the proposed Statement of Principles.</p>		

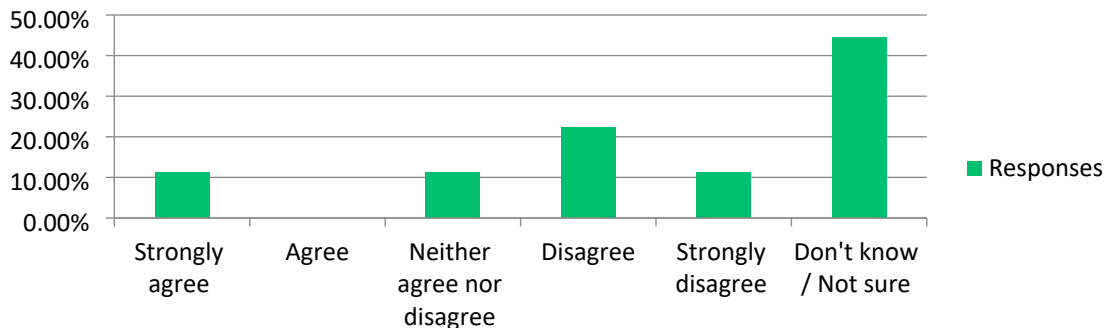
Question 9 - To what extent do you agree that the London Borough of Barnet is effectively enforcing the legislation in relation to gambling premises licences and permits? (Please tick one option only)

Q9 Results

Answer Choices	Responses	
Strongly agree	11.11%	1
Agree	0.00%	0
Neither agree nor disagree	11.11%	1
Disagree	22.22%	2
Strongly disagree	11.11%	1
Don't know / Not sure	44.44%	4

Answered	9
Skipped	5

**To what extent do you agree that the London Borough of Barnet is effectively enforcing the legislation in relation to gambling premises licences and permits?
(Please tick one option only)**



Summary

33.33% (3) of respondents disagreed that the London Borough of Barnet is effectively enforcing the legislation in relation to gambling, 11.11% (1) respondent agreed that there was effective enforcement, 11.11% (1) of respondents neither agree or disagree that gambling is being effectively enforced in the borough, and 44.44% (4) of respondents are unsure/don't know.

Question 10 - Please give reasons for your answer? (Q9) (Please type in your answer)

Q10
Results

Answered	4
Skipped	10

Responses
and LA
Comments

	Consultation Responses	Licensing Comments
1	Well I have driven past one of those slots machines places in North Finchley the other day. Doesn't do anything for the area.	<p>The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting crime activities.</p> <p>No amendments required to the proposed Statement of Principles.</p>
2	It will address the criminal and anti-social behaviours around these places	No amendments required to the proposed Statement of Principles.
3	We know that the legislation gives the council limited room for manoeuvre in relation to gambling licenses. However, there is scope for the council to interpret and enforce the rules more strictly. This is particularly important given the widespread public opposition to the expansion of gambling on our high streets and the damage they are doing to the quality of our environment and the threat they pose to vulnerable people and children. It has gone too far. We need councillors to be brave in this respect--you have the support of us, the residents.	<p>The Gambling Act 2005 does not give the Licensing Authority the ability to restrict the number of licensed premises opening in a certain area. We believe that the additions to the Local Area Plan will go some way to ensuring that any licences granted are not attracting criminal activities.</p> <p>All applications made for new licence are provided to the prescribed responsible authorities who have a duty to consider each application on its own merits. These Authorities can then seek to make representations to the application should they feel it necessary for the promotion of the Gambling Licensing Objectives. (I.e. The police would consider the application in relation to preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime).</p> <p>In addition to this if granted at any point during the duration of the</p>

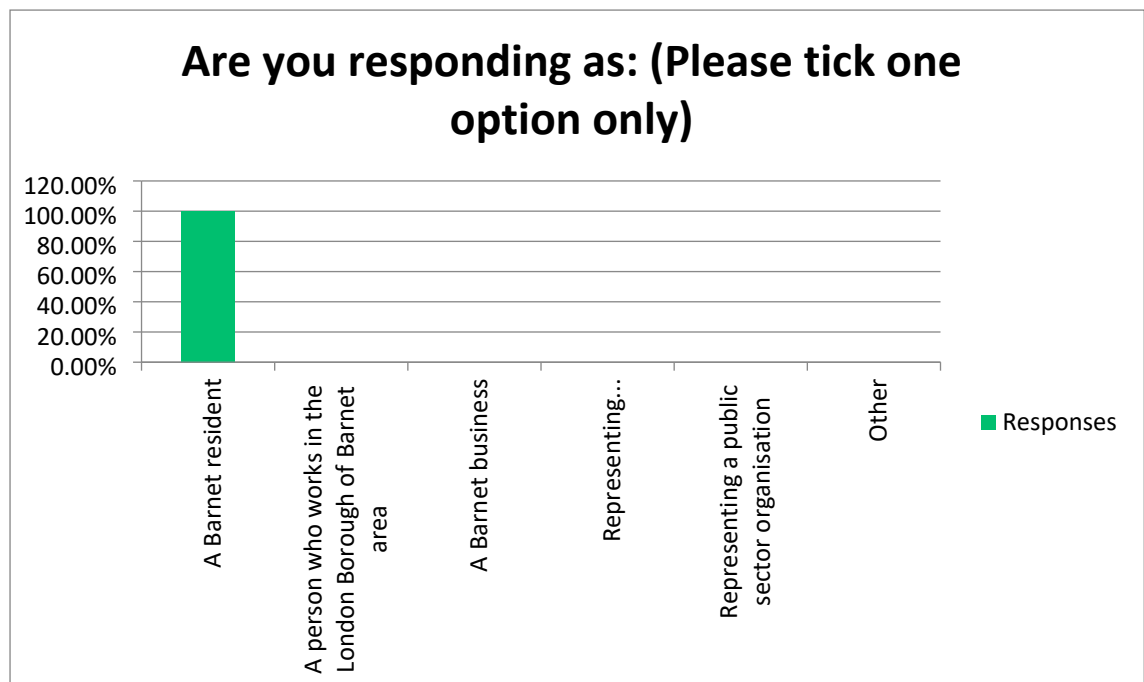
		<p>licence a Review application can be made should the premises be deemed to be negatively impacting upon the Gambling Licensing Objectives.</p> <p>No amendments required to the proposed Statement of Principles.</p>
	There are dozens of betting shops in Barnet	
Summary	The Licensing Authority does not consider the consultation responses necessitate any amendment to the proposed Statement of Principles.	

Question 11 - Are you responding as: (Please tick one option only)

Q11 Results

Answer Choices	Responses	
A Barnet resident	100.00%	9
A person who works in the London Borough of Barnet area	0.00%	0
A Barnet business	0.00%	0
Representing a voluntary/community organisation	0.00%	0
Representing a public sector organisation	0.00%	0
Other	0.00%	0
If other (please specify)		0

Answered	9
Skipped	5



Question 12 - Please specify the type of stakeholders or residents your community group or voluntary organisation represents: (Please type in your answer)

Q12
Results

Answered	2
Skipped	12

Responses
and LA
Comments

	Consultation Responses
1	Ordinary person living in Barnet.
2	West Hendon

Question 13 - Please specify the type of public sector organisation you are representing: (Please type in your answer)

Q12
Results

Answered	0
Skipped	14

Responses
and LA
Comments

	Consultation Responses
1	N/A

Question 14 - Which ward do you live in? If you live outside Barnet please select other and specify: (Please select one option only)

Q12
Results

Answered	0
Skipped	14

Responses
and LA
Comments

	Consultation Responses
1	N/A

Question 15 - In which age group do you fall? (Please tick one option only)

Q12
Results

Answered	0
Skipped	14

Responses
and LA
Comments

	Consultation Responses
1	N/A

Question 16 - Are you: (Please tick one option only)

Q16
Results

Answered	0
Skipped	14

Responses
and LA
Comments

	Consultation Responses
1	N/A

Question 17 - What is your ethnic group? (Please tick one option only)

Q16
Results

Answer Choices	Responses	
Asian - Bangladeshi	0.00%	0
Asian - Chinese	0.00%	0
Asian - Indian	0.00%	0
Asian - Pakistani	0.00%	0
Any other Asian background (please specify below)	0.00%	0
Black - African	0.00%	0
Black - British	0.00%	0
Black - Caribbean	0.00%	0
Any other Black / African / Caribbean background (please specify below)	0.00%	0
Mixed - White and Asian	0.00%	0
Mixed - White and Black African	0.00%	0
Mixed - White and Black Caribbean	0.00%	0
Mixed - any other Mixed / Multiple ethnic background (please specify below)	0.00%	0
White - British	0.00%	0
White - Greek / Greek Cypriot	0.00%	0
White - Gypsy or Irish Traveller	0.00%	0

White - Irish	0.00%	0
White - Turkish / Turkish Cypriot	0.00%	0
White - any other	0.00%	0
Prefer not to say	0.00%	0
Any other ethnic group (please specify)	0.00%	0

Answered	0
Skipped	14

Question 18 - Are you: What is your religion or belief? (Please tick one option only)						
Q18 Results	Answer Choices		Responses			
	Buddhist	0.00%	0			
	Christian (including Church of England, Catholic, Protestant and all other Christian denominations)	0.00%	0			
	Hindu	0.00%	0			
	Jewish	0.00%	0			
	Muslim	0.00%	0			
	Sikh	0.00%	0			
	No Religion	0.00%	0			
	Prefer not to say	0.00%	0			
	Other religion/belief (please specify)	0.00%	0			
	<table border="1"> <tr> <td>Answered</td> <td>0</td> </tr> <tr> <td>Skipped</td> <td>14</td> </tr> </table>		Answered	0	Skipped	14
Answered	0					
Skipped	14					
Responses and LA Comments	Consultation Responses					
	1	N/A				

Response to Consultation on the Gambling Statement of Principles Draft

Provided by: Public Health Directorate, Dr Janet Djomba, Deputy Director of Public Health

Section	Consultation Responses	Licensing Comments
10.9	<ul style="list-style-type: none"> • The document states that LBB will take into account the type of gambling and its potential to result in harm. As different types of gambling have different impacts, we suggest to include a section on gambling related harms in the document or in the Local Area Profile. <p>There is an opportunity to integrate substantive data on gambling harms from Office for Health Improvement & Disparities and UK Health Security Agency's report Gambling-related harms evidence review. The Public Health team can provide the Licencing team a summary of relevant information from this review for the Local Area Profile.</p> <ul style="list-style-type: none"> • When assessing risk, the Public Health team recommends expanding the list of matters to consider the following: <ul style="list-style-type: none"> - Location of the gambling premise and its proximity to vulnerable people or defining a gambling vulnerability zone, and - density of existing gambling establishments. 	<p>We will add the recommended matters to Section 10.9 of the revised Gambling Statement of Principles</p>
13.3	<ul style="list-style-type: none"> • The document mentions that the 'likelihood that children or vulnerable adults will enter the premises' will be considered when reviewing a license application. <p>Evidence review from the Gambling-related harms suggests that the Council should take a broader view of gambling harms. Ensuring that children or vulnerable adult do not enter the premises does not mean that those groups are protected from gambling harms.</p> <p>The existence of gambling establishments on the high street can contribute to promoting and normalising gambling, even for passersby who do not enter the establishment. Marketing materials</p>	<p>We will to add the recommended matters to Section 13.3 of the revised Gambling Statement of Principles</p>

	<p>(visible to passersby) used by gambling establishments for gambling awareness campaigns have been criticised for being highly suggestive by including the word 'FUN' in large letters.</p> <p>We therefore suggest a risk assessment is included in every licence application, demonstrating specific examples:</p> <ul style="list-style-type: none"> - how they will prevent children and vulnerable people from entering gambling premises, and - how they will reduce or mitigate the risks of children and vulnerable adults being exposed to advertising through shop windows and displays on highstreets. 	
18.4	<ul style="list-style-type: none"> • The Public Health team would like to see this section strengthened by outlining in greater detail the evidence on gambling-related harms, and what groups LBB considers to be at risk from harm or exploitation from gambling. <p>The Public Health Directorate will provide evidence on this</p>	<p>The Licensing Authority will welcome input from The Public Health Directorate moving forward with future revisions of the Gambling Statement of Principles.</p>
20.4 - 20.8	<ul style="list-style-type: none"> • It is positive that 'gambling vulnerability zones' are mentioned in section 20.4. However, there is potential to significantly strengthen the Local Area Profile (see further comments below) and to define a 'vulnerability zone' in greater depth. The licensing team should consider not just proximity to schools, educational institutions or sensitive locations, but also leisure centres, community facilities, areas with an over-concentration of similar venues, job centres, deprived areas, alcohol and drug treatment facilities, etc. 	<p>We are unable at this stage to amend the format or information contained within the Local Area Plan as set out in the current revised Statement of Principles.</p> <p>The Licensing Team are keen however to engage with colleagues in The Public Health Directorate in order to make the Local Area Profile a standalone document that can go live with the introduction of the 2027's revised Statement of Gambling Principles.</p> <p>Extensive work will need to be undertaken in this area that we will unfortunately not be able to include within the current proposal.</p>
Local Area Profile	<ul style="list-style-type: none"> • Given that councils are limited in their ability to limit or refuse gambling shops, betting shops, adult gaming centres, and bingo parlours in light of the national gambling laws, the Local Area Profile is a very important document for setting out how Barnet Council sees the harms associated with gambling. 	<p>We are unable at this stage to amend the format or information contained within the Local Area Plan as set out in the current revised Statement of Principles.</p> <p>The Licensing Team are keen however to engage with colleagues in The Public Health Directorate in order to make the Local Area Profile a standalone document that can go live</p>

	<p>The Public Health team is keen to work with the Licensing Team and the Insight and Intelligence team to further enhance the Local Area Profile.</p> <p>The Public Health team would like to see the Local Area Profile substantially strengthened in line with best practice from other boroughs such as Westminster and Southwark</p> <p>We therefore recommend the following:</p> <ol style="list-style-type: none"> 1. Make the Local Area Profile a standalone document Westminster has created a standalone Local Area Profile which can be reviewed regularly and updated when the data changes, without the need to carry out a statutory review of the Statement of principles. The Insight and Intelligence team could support this work to make this an online document compatible with the existing software solutions and incorporating data flows. 2. Strengthen the Local Area Profile with greater detail and analysis Though the current Local Area Profile captures issues including crime, levels of deprivation, density of licensed premises, the Local Area Profile could be strengthened by overlaying all of these maps to create a more detailed map with zones of vulnerability. Following Southwark's example, Barnet Licensing together with Public Health and the Insight and Intelligence team could undertake the following steps to strengthen the document: <ol style="list-style-type: none"> (1) Identify groups in Barnet who are vulnerable to gambling or affected by gambling harms - this would involve going beyond the vulnerable groups currently outlined in the draft Gambling Statement of Principles and drawing on the extensive evidence base about who is vulnerable to gambling harms. (2) Identify the key data sets or data sources available on location and 	<p>with the introduction of the 2027's revised Statement of Gambling Principles.</p> <p>Extensive work will need to be undertaken in this area that we will unfortunately not be able to include within the current proposal.</p>
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	<p>vulnerable persons criteria as per Southwark's example.</p> <p>(3) Create a map, incorporating all the datasets - this map could then be used to generate a localised map when new licensing or planning application is made in relation to gambling establishments.</p>	
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Burnt Oak Residents Association consultation response.

Key Messages

<p><u>Approach: shift to a two-stage process</u></p> <p>The Borough could prepare a Cumulative Impact Assessment to support its Statement of Principles. This approach has been taken elsewhere and is entirely compatible with the Licensing Act 2003. We consider it to be best practice and that it will be acceptable to all stakeholders.</p>	<p>The Licensing Policy is due for renewal in 2024 and we will investigate the suggestion made.</p> <p>The Licensing Team will take a steer from their legal department in relation to this request to ensure that any changes made are in line with both the Licensing Act 2003 and Gambling Act 2005.</p>
<p><u>Boundaries: accept that real-life harms stretch beyond administrative lines</u></p> <p>Town centres located in more than one borough should be treated as special cases. Steps should be taken to develop analysis sophisticated enough to capture these realities.</p>	<p>We are unable at this stage to amend the format or information contained within the Local Area Plan as set out in the current revised Statement of Principles.</p> <p>The Licensing Team are keen however to engage with colleagues in Insight & Intelligence Team to gather the appropriate intelligence in order to make the Local Area Profile a standalone document that can go live with the introduction of the 2027's revised Statement of Gambling Principles.</p> <p>Extensive work will need to be undertaken in this area that we will unfortunately not be able to include within the current proposal.</p>
<p><u>Collaborate: make use of specialist resources within the council</u></p> <p>The licencing team should seek assistance from the Council's data and analytics experts to underpin the feasibility of the above two recommendations.</p>	<p>We are unable at this stage to amend the format or information contained within the Local Area Plan as set out in the current revised Statement of Principles.</p> <p>The Licensing Team are keen however to engage with colleagues in Insight & Intelligence Team to gather the appropriate intelligence in order to make the Local Area Profile a standalone document that can go live with the introduction of the 2027's revised Statement of Gambling Principles.</p>

	Extensive work will need to be undertaken in this area that we will unfortunately not be able to include within the current proposal.
<p><u>Duties: Gambling Commission Annual Returns</u></p> <p>We strongly request the Licensing Team submit all the data required by the Gambling Commission in the form of Annual Returns.</p>	<p>We can confirm that all Annual Return data for the Gambling Commission is and was up to date.</p> <p>Contact is being made with the Gambling Commission to ascertain where the issue lays in relation to the incorrect information that they have published.</p>

SoP summary of Changes

Section	Consultation Responses	Licensing Comments
1.1	BORA supports LBB's continued resolution not to issue casino licences	No amendments required to the proposed Statement of Principles.
4	LBB SOP Para. 39.1: we take no issue with the Council's intention to take cultural strategy more seriously. As such, we would like to signpost SOP produced by Westminster City Council ("WCC") as an approach for LBB to consider in future. WCC has with significant tourism, cultural and licensing responsibilities and their approach to gambling licensing policy is considered best practice ¹ .	<p>We are unable at this stage to amend the format or information contained within the Local Area Plan as set out in the current revised Statement of Principles.</p> <p>The Licensing Team are keen however to engage with colleagues in Insight & Intelligence Team to gather the appropriate intelligence in order to make the Local Area Profile a standalone document that can go live with the introduction of the 2027's revised Statement of Gambling Principles.</p>
5	As part of our research, we reviewed WCC's SOP, Local Area Plan ("LAP") and its Cumulative Impact Assessment ("CIA"). WCC's work acknowledges the economic benefits of the leisure and night-time economies at the same time as recognising how to address complexities in gambling-related harms data. ² We have concluded that this holistic approach should be followed by LBB in future and have referenced it in responses below but have refrained from including methodological details.	<p>We are unable at this stage to amend the format or information contained within the Local Area Plan as set out in the current revised Statement of Principles.</p> <p>The Licensing Team are keen however to engage with colleagues in Insight & Intelligence Team to gather the appropriate intelligence in order to make the Local Area Profile a standalone document that can go live with the introduction of the 2027's revised Statement of Gambling Principles.</p>

¹ 'High Stakes: Gambling Reform for the Digital Age', Department for Culture Media and Sport (2003), para. 155 (page 215) and Box 16 (Page 216): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1153228/1286-HH-E02769112-Gambling_White_Paper_Book_Accessible1.pdf (accessed 25/10/23). NB: despite the title, the document includes a section on 'land-based gambling'.

² WCC's LAP is here: <https://www.westminster.gov.uk/licensing/licensing-policy-and-strategy/local-area-profile-gambling-risk> (accessed 25/10/2023). Part 3 is of particular interest as it shows the estimated excess costs of harm associated with gambling, by type of harm (e.g. financial, health, crime etc) and type of cost (to government, society).

13.3	<p>We are happy that LBB has retained the statement about information sharing with responsible authorities since this contributes to evidence-based data-driven policy and decision-making at the national level.</p> <p>We are aware that on occasion LBB failed to submit an Annual Return to the Gambling Commission.³ We therefore request that the Licensing Team ensure all future Returns are submitted on time and that missing Returns are submitted as well.</p>	<p>No amendments required to the proposed Statement of Principles.</p> <p>We can confirm that all Annual Return data for the Gambling Commission is and was up to date.</p> <p>Contact is being made with the Gambling Commission to ascertain where the issue lays in relation to the incorrect information that they have published.</p>
39.1	<p>we take no issue with the Council’s intention to take cultural strategy more seriously. As such, we would like to signpost SOP produced by Westminster City Council (“WCC”) as an approach for LBB to consider in future. WCC has with significant tourism, cultural and licensing responsibilities and their approach to gambling licensing policy is considered best practice</p>	<p>The Licensing Team have already started the process of engaging with WCC in relation to the development of their LAP and CIA documents.</p> <p>We are aware of extensive work that will need to be undertaken in this area which we will do so with our Insight & Intelligence team and other appropriate partners.</p>
Appendix A:	<p><u>LBB Local Area Profile</u></p> <p>BORA was keen to compare our ward to other wards. However, Map 1’s resolution was not sharp enough to determine the exact number of premises in each ward. The LAP would be much improved if Map 1 was supplemented with a table showing the count for each ward, the borough total and the percentage of that total for each ward. It would also be useful for that table to be included in the Licensing Committee’s Annual Report (perhaps with prior year comparatives).⁴</p> <p>BORA found it challenging to draw conclusions from other maps in LBB’s LAP. We believe it could be improved if more detailed analysis was sought from analysts in LBB’s Insight and Intelligence Team and if methodological information was subsequently published as well⁵. This would be in line with LBB’s Corporate plan which puts a particular emphasis on increased collaboration and transparent decision making⁶.</p>	<p>We are unable at this stage to amend the format or information contained within the Local Area Plan as set out in the current revised Statement of Principles.</p> <p>The Licensing Team are keen however to engage with colleagues in Insight & Intelligence Team to gather the appropriate intelligence in order to make the Local Area Profile a standalone document that can go live with the introduction of the 2027’s revised Statement of Gambling Principles.</p> <p>Extensive work will need to be undertaken in this area that we will unfortunately not be able to include within the current proposal.</p>

³ See: <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/licensing-authority-statistics-2021-to-2022-revision#files>.

⁴ NB: The prior year annual report (presented to Councillors on 07/11/22) is only includes the grand total: <https://barnet.moderngov.co.uk/documents/s74874/Licensing%20Authority%20Annual%20Committee%20Report%20final.pdf> (accessed 25/10/2023).

⁵ Contact: head of Organisational Insight and Intelligence, James.Rapkin@Barnet.gov.uk

⁶ LBB Corporate Plan : <https://www.barnet.gov.uk/media/14547> (accessed 25/10/2023).

	<p>LBB’s aspiration should be to produce a CIA prior to its LAP – proportional to LBB’s context. For example, WCC’s LAP identifies localities subject to enhanced risk. These are known as Gambling Vulnerability Zones. If an application relates to a premise in one of these zones, then WCC will apply specific special policies.⁷ The identification of such zones is dependent on the CIA. BORA believes that much of the data needed to create a CIA is likely to already exist in LBB however, as an interim step in its development, LBB could emulate neighbouring borough LAPs such as Haringey⁸ and Enfield⁹.</p> <p>The following points about adoption of an enhanced (WCC-style) process should be noted:</p> <ul style="list-style-type: none"> - It does not impose additional regulatory burdens for their own sake;¹⁰ - It allows licensing authorities to comply with the “aim to permit” concept yet respond to repeated concerns about concentrations of gambling premises¹¹; - A Licensing Authority Statement must be made regarding the likelihood of refusing to grant licenses in specific areas (on the basis of risks identified)¹²; and - A licensing authority needs to consult on a CIA prior to it being included in a SOP/LAP. <p>BORA believe that one additional innovation has not been explored by WCC, which should be applied in future LBB analysis – that of “Hot Boundary”. These can be seen as a special case of “hot spot” - the distinction is that the hot spot crosses at least one administrative boundary. The problem with all the SOP analysis is that it:</p>	
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⁷ WCC’s SOP is here: <https://www.westminster.gov.uk/media/document/statement-of-licensing-principles-for-gambling-december-2022> (accessed 25/10/2023). Section F (Spatial Policies) is relevant.

⁸ Haringey’s LAP (accessed 25/10/23): https://www.haringey.gov.uk/sites/haringeygovuk/files/gambling_local_area_profile.pdf

⁹ Enfield’s LAP (embedded in SOP, accessed 25/10/23): https://www.enfield.gov.uk/data/assets/pdf_file/0030/17877/DRAFT-6th-Edition-Statement-of-Principles-and-Local-Area-Profile-Document.pdf

¹⁰ WCC’s LAP, para. 1.3 (see link above).

¹¹ While we have not conducted an in-depth analysis, BORA believes that if LBB produced a CIA, some areas of Burnt Oak would be designated as a Gambling Vulnerability Zone. As such we are very interested in WCC’s “intersectional” risk approach (as described in its LAP).

¹² See page 19 of WCC’s CIA (accessed 25/10/23): <https://www.westminster.gov.uk/media/document/020-cumulative-impact-assessment---october-2020> .

	<ul style="list-style-type: none"> - Naively treats spatial data as if lived experiences take place in a single borough; - Masks situations where increased exposure to vulnerable people exists because it does not scope in all the relevant data; - Failure to capture all adjacent harms; and therefore - Results in incomplete policy conclusions (false negatives¹³) which potentially increases the risk of further harms. <p>Hence, ironically, some SOPs have been a systemic source of gambling-related harms themselves.</p> <p>If analysis is to be fit for purpose it must properly address the Hot Boundary phenomenon. This means that data from more than one borough needs to be collected, aggregated and analysed in a rare number of cases¹⁴.</p> <p>BORA considers Burnt Oak Broadway to be Hot Boundary (see analysis in Appendix 4).¹⁵ To address this in future, we would expect LBB to liaise with LB Harrow and LB Brent for its spatial data. Again, this should not be seen as an additional burden on LBB because it has signed a 'Statement of Common Ground' with both boroughs which commit it to working with the other boroughs to improve Burnt Oak Town Centre.¹⁶</p>	
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¹³ A false negative is a conclusion that no/low harms exist in a particular locality when the opposite is true. The point is: if a conclusion of no/low risk cannot be sustained when LBB data is “stitched together” with another boroughs, then it should not be sustained when data from LBB is analysed in isolation.

¹⁴ Our analysis show that Hot Boundaries in London are rare and that in Barnet, there are potentially four, all of which are on the A5 (see Appendix 3).

¹⁵ It should be noted that while our analysis shows duplication of Gambling Operator premises in Burnt Oak Town Centre, it is not an argument designed to challenge over supply, since considerations about the of lack of “demand” in an area are not permitted under the Licensing Act 2003.

¹⁶ Statement with Harrow can be found here: <https://www.barnet.gov.uk/sites/default/files/LB%20Harrow%20SCG.pdf> (accessed 25/10/23). Statement with Brent can be found here: https://www.barnet.gov.uk/sites/default/files/EB_SoCG_01%20LB%20Brent.pdf (accessed 25/10/23).