

## APPENDIX B – CONSULTATION RESPONSES

### SECTION 1 – CONSULTEES

Director of Public Health for Harrow
Association of British Bookmakers
BACTA
Harrow Law Centre
Relate (Harrow)
Citizens' Advice Bureau (Harrow) Civic 9 Station Road HARROW Middlesex HA1 2XH
Harrow Adult Substance Misuse Service
Chief officer of police (Harrow)
Gambling Commission
London Fire and Rescue Service
Local planning authority
Harrow Council Public Protection
Local Childrens' Safeguarding Board
HM Revenue & Customs. National Registration Unit- Betting & Gaming;Portcullis House;21 India Street; Glasgow;G2 4PZ
Ladbrokes Betting & Gaming Limited 5th Floor, The Zig Zag Building, 70 Victoria Street, London, SW1E 6SQ.
Admiral Leisure (Novomatic) William Hill, Clifton House, 1 to 5 Morris Place, Finsbury, London, N4 3JG.
Paddy Power UK 33 St James's Square, ., Westminster, London, SW1Y 4JS.
Future Leisure Limited, Unit 20 Fleetway Business Park, 14-16 Wadsworth Road, Greenford, Middlesex, UB6 7LD
Cashino Gaming Ltd Seebeck House, 1A Seebeck Place, Knowlhill, Milton Keynes, MK5 8FR.
Betfred Spectrum, 56/58 Benson Road, Birchwood, Warrington, WA3 7PQ.
Silvertime Amusements Ltd 116 Burnt Oak Broadway, Edgware, HA8 0BB.

#### **AWP Holders:**

London Edgware Premier Inn, 435 Burnt Oak Broadway, Edgware, Middlesex, HA8 5AQ
The 19 Club, 19 North Parade, Mollison Way, Edgware, Middlesex, HA8 5QH
Zan Zi Bar, 113 High Street, Edgware, Middlesex, HA8 7DB
St Gabriel's Social Club, 388 Northolt Road, South Harrow, Middlesex, HA2 8EX
Ruffles, 16 Canning Road, Wealdstone, Middlesex, HA3 7SJ
Urban Haandi, 244 Streatfield Road, Harrow, Middlesex, HA3 9BX
Purple Flame, 433-437 Honeypot Lane, Stanmore, Middlesex, HA7 1JJ
Lisbon Deli Cafe, 9 Whitchurch Parade, Whitchurch Lane, Edgware, Middlesex, HA8 6LP
Maya Pub, 3 Shaftesbury Parade, Shaftesbury Avenue, South Harrow, Middlesex, HA2 0AJ
TJ's Sports Bar, 108 High Street, Wealdstone, Harrow, Middlesex, HA3 7AH

Travellers Rest PH, The Travellers Rest, Kenton Road, Harrow, Middlesex, HA3 8AT
Life of Reilly, 7 Warwick Parade, Kenton Lane, Harrow, Middlesex, HA3 8SA
Jameson's Bar, 34 South Parade, Mollison Way, Edgware, Middlesex, HA8 5QL
Masons Arms Public House, 75 High Street, Edgware, Middlesex, HA8 7DD
Kenton Kebab House, 130 Kenton Road, Harrow, Middlesex, HA3 8AL
The Kingsfield Arms Public House, 111 Bessborough Road, Harrow, Middlesex, HA1 3DF
McCafferty's Freehouse, 25 Broadwalk, Pinner Road, Harrow, Middlesex, HA2 6ED
Dalys, 100 High Street, Wealdstone, Harrow, Middlesex, HA3 7AH
The New Moon, 25-26 Kenton Park Parade, Kenton Road, Harrow, Middlesex, HA3 8DN
Nineteen Executive Club, 10 North Parade, Mollison Way, Edgware, Middlesex, HA8 5QH
The Change of Hart Public House, 21 High Street, Edgware, Middlesex, HA8 7EE
Royal Oak, Public House, 86 St Anns Road, Harrow, Middlesex, HA1 1JP
O'Neill's PH, 335-339 Station Road, Harrow, Middlesex, HA1 2AA
The Moon On The Hill, Lynwood House, 373-375 Station Road, Harrow, Middlesex, HA1 2AW
The Junction PH, Gayton Hall, 9 Gayton Road, Harrow, Middlesex, HA1 2JG
The Harrow, 269-271 Station Road, Harrow, Middlesex, HA1 2TB
The White Horse, 50 Middle Road, Harrow, Middlesex, HA2 0HL
The Star Public House, 2 South Hill Avenue, Harrow, Middlesex, HA2 0NQ
The Horseshoe Bar, 326-326A Eastcote Lane, South Harrow, Middlesex, HA2 9AJ
The Laurels, 337 High Road, Harrow, Middlesex, HA3 5EQ
Duck In The Pond Public House, 660 Kenton Lane, Harrow, Middlesex, HA3 6AA
Miller & Carter, Leefe Robinson, 76 Uxbridge Road, Harrow Weald, Harrow, Middlesex, HA3 6DL
Oddfellows Arms PH, 2 Waxwell Lane, Pinner, Middlesex, HA5 3EN
The Moon And Sixpence PH, 250 Uxbridge Road, Hatch End, Pinner, Middlesex, HA5 4NY
Village Inn, Village Inn, 402-408 Rayners Lane, Harrow, Middlesex, HA5 5DY
The Pinner Arms, The Pinner Arms Public House, Whittington Way, Pinner, Middlesex, HA5 5JS
The Queens Head Public House, 31 High Street, Pinner, Middlesex, HA5 5PJ

## LOTTERIES:

St Joseph's Church, 191 High Road, Harrow, Middlesex, HA3 5EE.

Harrow Mencap, 3 Jardine House, Bessborough Road, Harrow, Middlesex, HA1 3EX.

Longfield First & Middle School, Longfield First And Middle School, Dukes Avenue, North Harrow, Middlesex, HA2 7NZ.

20 Longcrofte Road, Edgware, Middlesex, HA8 6RR.

Cannon Lane Primary School, Cannon Lane School, Cannonbury Avenue, Pinner, Middlesex, HA5 1TS.

Social Club, Royal National Orthopaedic Hospital, Brockley Hill, Stanmore, Middlesex, HA7 4LP.

Sri & Co Accountants Ltd, Cunningham House, 19 Westfield Lane, Harrow, Middlesex, HA3 9ED.

St Williams RC Church 1791 Nw, St Williams Church, Du Cros Drive, Stanmore, Middlesex, HA7 4TJ.

Roxeth School Association, Roxeth Primary School, Brickfields, Harrow, Middlesex, HA2 0JA.

Royal National Orthopaedic Hospital, The Disability Foundation, Royal National Orthopaedic Hospital NHS Trust, Brockley Hill, Stanmore, Middlesex.

Friends of Grimsdyke School, Grimsdyke First And Middle School, Sylvia Avenue, Pinner, Middlesex, HA5 4QE.

North London Collegiate School, Canons Drive, Edgware, Middlesex, HA8 7RJ.

St Albans Church Hall, Norwood Drive, Harrow, Middlesex, HA2 7PF.

21 Manor Road, Harrow, Middlesex, HA1 2PF.

Whitefriars School, Whitefriars Avenue, Harrow, Middlesex, HA3 5RQ.

St Teresa's RC First & Middle School, Long Elmes, Harrow Weald, Harrow, Middlesex, HA3 6LE.

St Anselms First and Middle School, Saint Anselms School, Roxborough Park, Harrow, Middlesex, HA1 3BE.  
St Jerome C of E Bilingual School, 120-138 Station Road, Harrow, Middlesex, HA1 2DJ.  
Aspire National Training Centre, Royal National Orthopaedic Hospital Nhs Trust, Wood Lane, Stanmore, Middlesex, HA7 4AP.  
17 Rochester Drive, Pinner, Middlesex, HA5 1DA.  
Vaughan Primary School, The Gardens, West Harrow, Harrow, HA1 4EL.  
Harrow Borough Football Club, Earlsmead, Harrow, Middlesex, HA2 8SS.  
New Bentley N R C, Harrow Council, 184A Christchurch Avenue, Harrow, Middlesex, HA3 5BD.  
Harrow West Conservative Association, 10 Village Way, Pinner, Middlesex, HA5 5AF.  
Pinner Wood School, Latimer Gardens, Pinner, Middlesex, HA5 3RA.  
Stag Lane First School, Stag Lane School, Collier Drive, Edgware, Middlesex, HA8 5RU.  
Pinner Park First & Middle School, Pinner Park County First And Middle School, Melbourne Avenue, Pinner, Middlesex, HA5 5TJ.  
Aylward Primary School, Aylward First & Middle School, Pangbourne Drive, Stanmore, Middlesex, HA7 4RE.

## **SECTION 2 – CONSULTATION RESPONSES**

**From:** XXX [mailto:XXX@novomatic.co.uk]

**Sent:** 23 July 2018 10:24

**To:** license

**Cc:** XXX

**Subject:** Gambling Act 2005 - Statement of Principles Consultation (Harrow Council)

Dear Sirs

### **Gambling Act 2005 – Statement of Principles Consultation**

On behalf of Luxury Leisure, I make the following comments in response to the above consultation draft (the “Draft”):-

1. As the Authority will appreciate, in matters of regulation under the Gambling Act 2005 (the “Act”), it is subject to the Regulators’ Code. That code imposes a number of obligations on the Authority, including one that it should carry out its activities in a way that it supports those it regulates to comply and grow. Additionally, when designing and reviewing policies, the Authority must among other things, understand and minimise the negative economic impact of its regulatory activities and regulate and minimise the costs of compliance of those it regulates. Further, the Authority should take an evidence-based approach in determining priority risks and recognise the compliance record of those it regulates. I do not think there is reference to the Regulators’ Code in the current Draft and suggest that it would be appropriate to incorporate it.
2. Para 3.5 – children are of course permitted to access certain gambling premises and in some premises are entitled to engage in a limited range of gambling activities. It might be helpful for this to be made clear.
3. Para 3.6 – similarly, it would be helpful if it was clarified that the Act permits children to access certain premises and to engage in limited gambling activities in some. The comments in the Draft about restrictions on the presence of children would not apply to such premises.
4. Para 3.17 – again, children are permitted to take part in some gambling activities and this should be made clear. In those circumstances, plainly they are permitted to “be in close proximity to” gambling.
5. Para 5.3 – as the Draft confirms, issues of planning are not relevant to a licensing application (save in limited circumstances relating to the licensing objectives). It is therefore confusing that the Draft suggests that licensing applicants consider the local planning authority’s approach to granting planning permissions. I suggest that this is removed.
6. Para 9.6 – In relation to inspections, I note the proposal that only a quarter of betting premises will be visited each year, whereas each AGC or bingo premises will be visited every 12-18 months. I appreciate that the proposed inspection rate for betting premises is based on the fact that the majority of premises are operated by the same businesses and that standards should be consistent within the business. However, that is not necessarily the case in practice and, as the Draft notes, each premises will differ in terms of location, previous crime and incident reports and each business is staffed by different individuals. On the basis of the above we see no reason for inspections of betting premises to be different from those of other adult gambling sites.

7. Para 10.4 – as above, children are permitted to partake in limited types of gambling and this should be made clear. Further, the Act does not prohibit children being in “close proximity to gambling”. We appreciate that this concept might have originated with the Gambling Commission, but is not based on the statute.
8. Para 10.17 – whilst we acknowledge that the licensing authority will expect applicants to offer suggestions as to the ways in which the licensing objectives can be met effectively, the current Draft might be taken to suggest that applicants should suggest their own conditions. Licences are already covered by mandatory and default conditions and suggest that the words “if appropriate” be inserted after the words “... expect the licence applicant”.
9. Para 10.21 – the Draft states that “there is no evidence that the operation of betting offices has required door supervisors for the protection of the public” (emphasis added). Whilst this might be true, it is also the case in relation to AGCs, FECs and bingo premises and we suggest this be clarified.
10. Paras 14 and 15 – whilst 10 sample “appropriate licence conditions” are cited for AGCs at paragraph 11, this has not been repeated for bingo premises nor betting premises. This is inconsistent and I suggest that the same provisions be included.

I hope that the above proves useful. If you have any questions, please do not hesitate to contact me.

Yours faithfully,

XXX  
Group General Counsel  
**Novomatic UK**

**From:** Simon Rose  
**Sent:** 28 June 2018 10:29  
**To:** license; Paul Walker  
**Subject:** RE: Consultation on Gambling Act policy for London Borough of Harrow

Jeffrey, Paul,

Just for your if I did reply to this and briefly offer my view that there are too many bookmakers, particularly in the higher crime and ASB wards, that FOBTs are driving crime and ASB and those people who are least able to lose high sums of money are disproportionately those who do.

Sorry if this causes you trouble, but I do believe it's true and its worth raising

sorry

Simon  
BCU Commander Barnet Brent and Harrow

**From:** Louis.Smith

**Sent:** 29 June 2018 15:01

**To:** Simon.Rose; Paul Walker; license; Niki.Walker; Gemma O'Dowd

**Cc:** Oonagh.M.Vyse

**Subject:** RE: Consultation on Gambling Act policy for London Borough of Harrow

Simon

Agreed. I think licensing across the board has a real part to play in protecting the most vulnerable, specifically in preventing the cynical saturation of licensed premises (betting shops and pubs) in the very areas they will cause most trouble for the residents. The companies choose those areas as they make the most money. I think that is where the debate has to begin and the policy be shaped to manage the risks down.

Once I have Insps names, I will ask the lead Insp to take this issue up.

Louis

### SECTION 3 – CONSULTATION RESPONSE FEEDBACK

No.	Consultee	Response	Feedback from Authority
1.	Novomatic	As the Authority will appreciate, in matters of regulation under the Gambling Act 2005 (the “Act”), it is subject to the Regulators’ Code. That code imposes a number of obligations on the Authority, including one that it should carry out its activities in a way that it supports those it regulates to comply and grow. Additionally, when designing and reviewing policies, the Authority must among other things, understand and minimise the negative economic impact of its regulatory activities and regulate and minimise the costs of compliance of those it regulates. Further, the Authority should take an evidence-based approach in determining priority risks and recognise the compliance record of those it regulates. I do not think there is reference to the Regulators’ Code in the current Draft and suggest that it would be appropriate to incorporate it.	The Council Enforcement Services are governed by a clear Enforcement Policy which includes the Regulators’ Code so there is no specific need to include it within other policies
2.		Para 3.5 – children are of course permitted to access certain gambling premises and in some premises are entitled to engage in a limited range of gambling activities. It might be helpful for this to be made clear.	This is already set out in section 3.20 of the Policy
3.		Para 3.6 – similarly, it would be helpful if it was clarified that the Act permits children to access certain premises and to engage in limited gambling activities in some. The comments in the Draft about restrictions on the presence of children would not apply to such premises.	This is already set out in section 3.20 of the Policy
4.		Para 3.17 – again, children are permitted to take part in some gambling activities and this should be made clear. In those circumstances, plainly they are permitted to “be in close proximity to” gambling.	This is already set out in section 3.20 of the Policy
5.		Para 5.3 – as the Draft confirms, issues of planning are not relevant to a licensing application (save in limited circumstances relating to the licensing objectives). It is therefore confusing that the Draft suggests that licensing applicants consider the local planning authority’s approach to granting planning permissions. I suggest that this is removed.	This is general advice as may still affect the premise dependant on what else is proposed on site
6.		Para 9.6 – In relation to inspections, I note the proposal that only a quarter of betting premises will be visited each year, whereas each AGC or bingo premises will be visited every 12-18 months. I appreciate that the proposed inspection rate for betting premises is based on the fact that the majority of premises are operated by the same businesses and that	Noted

		standards should be consistent within the business. However, that is not necessarily the case in practice and, as the Draft notes, each premises will differ in terms of location, previous crime and incident reports and each business is staffed by different individuals. On the basis of the above we see no reason for inspections of betting premises to be different from those of other adult gambling sites.	
7.		Para 10.4 – as above, children are permitted to partake in limited types of gambling and this should be made clear. Further, the Act does not prohibit children being in “close proximity to gambling”. We appreciate that this concept might have originated with the Gambling Commission, but is not based on the statute.	This is already set out in section 3.20 of the Policy
8.		Para 10.17 – whilst we acknowledge that the licensing authority will expect applicants to offer suggestions as to the ways in which the licensing objectives can be met effectively, the current Draft might be taken to suggest that applicants should suggest their own conditions. Licences are already covered by mandatory and default conditions and suggest that the words “if appropriate” be inserted after the words “... expect the licence applicant”.	Policy Adjusted
9.		Para 10.21 – the Draft states that “there is no evidence that the operation of <u>betting offices</u> has required door supervisors for the protection of the public” (emphasis added). Whilst this might be true, it is also the case in relation to AGCs, FECs and bingo premises and we suggest this be clarified.	Betting offices are subject to the most complaints in the authority and that is why these are specifically mentioned. The other premises present less of a risk and there are no FECs in the Borough
10.		Paras 14 and 15 – whilst 10 sample “appropriate licence conditions” are cited for AGCs at paragraph 11, this has not been repeated for bingo premises nor betting premises. This is inconsistent and I suggest that the same provisions be included.	This is based on issues that have previously arisen and if evidence shows the other premises need this approach, then it would be adopted
11.		Just for your if I did reply to this and briefly offer my view that there are too many bookmakers, particularly in the higher crime and ASB wards, that FOBTs are driving crime and ASB and those people who are least able to lose high sums of money are disproportionately those who do.	Unfortunately there is no provision under the Act to allow a saturation policy or means to limit such premises



12.		Agreed. I think licensing across the board has a real part to play in protecting the most vulnerable, specifically in preventing the cynical saturation of licensed premises (betting shops and pubs) in the very areas they will cause most trouble for the residents. The companies choose those areas as they make the most money. I think that is where the debate has to begin and the policy be shaped to manage the risks down.	As above and also more of a national debate
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