

Mon 04/10/2021 14:24

Dear Ms Taylor,

I write with regard to the application by Merkur Slots UK Ltd for a Bingo premises licence in respect of the premises intended to be traded as Merkur Slots at 247 Heathway, Dagenham, RM9 5BG in my capacity as Licensing Authority Responsible Authority Officer.

Having read through the application and accompanying documents I wish to lodge a representation against the application under the first and third licensing objectives of

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Protecting children and other vulnerable people from being harmed or exploited by gambling

At this point, my opposition derives from the Council's Statement of Gambling Licensing Principles and associated Risk-Assessment of Local Area Vulnerability to Gambling Related Harm.

The risk-assessment is introduced as the Council's local area profile in Section 3 of the policy. It comprises an analysis of local socio-economic and public health data sets together with police data sets concerning anti-social behaviour. It uses spatial analysis techniques to provide a model of vulnerability to gambling related harm across the borough.

This assessment, supported by the assessment within the analysis provided by the Index of Multiple Deprivation (IMD) (2015) gives rise to the Council's stated position within the policy (sections 40/41) that this borough is "subject to widespread deprivation to which gambling related harm contributes" and that "this position gives rise to serious concerns of the impact of any further increase in the number of gambling premises may have for the most 'vulnerable' and 'at risk' areas of the borough. The Authority considers it is necessary to strictly control the number of facilities for gambling in areas where its most vulnerable residents may be placed at increasing risk, and in line with the duty to aim to permit gambling in so far as it is reasonably consistent within the pursuit of the licensing objectives. All areas shown within the local area profile as being at high overall risk of gambling related harm, are generally considered inappropriate for further gaming establishments which would raise the risk of gambling related harm to vulnerable people living in those areas. Operators are asked consider very carefully whether seeking to locate new premises or relocating existing premises within these areas would be consistent with the licensing objectives."

Section 44 of the policy goes on to say "the local area profile is intended to help facilitate constructive engagement between operators and licensees and a more co-ordinated response to local risks".

The application under consideration intends to open a new gaming premises in Dagenham Heathway. The combined vulnerable locality index plus IMD decile map contained in the local area profile / risk-assessment shows Heathway to be in the area of concern. A Public Spaces Protection Order, banning anti-social behaviour, has been in place in the area since 2018 and this has just been extended for another three years. The addition of another premises in the area has the potential to further increase the problems experienced.

The applicant company's own comprehensive local area profile clearly recognises these local concerns. It records and notes

- The premises is intended to enjoy a high-street location directly opposite Dagenham library

- There are a number of local vulnerable (people) and addiction support services nearby
- The premises is next to a bookmakers
- There are four other bookmakers and an adult gaming centre in the area
- Dagenham Heathway London Underground Station is 5 minutes walk away
- The postcode is classified as a high crime area
- The local police have raised a number of concerns and apparent significant problems with existing gambling premises relating to street drinking, ASB, drug dealing and violence
- The number of persons that are economically active in Dagenham is below the national average
- The IMD places the borough in the 30-40% most deprived areas
- 14 schools are listed under the postcode
- 9 community centres and youth centres are located under the postcode
- 13 parks, playgrounds and sports / leisure facilities are listed under the postcode
- 7 pawnbrokers and loan shops are listed under the postcode

The level of research is commended but having researched this information and identified the numerous areas of concern the company has still considered this an appropriate locality for another gambling premises. Furthermore, it has done so without any reference or approach made to the local authority to discuss the local situation and what might be appropriate.

Instead an application has been made which presents in general a collection of centralised policies with apparently little more added in terms of additional local management controls that might help assist the position.

Additionally, I would query why the application is seeking a bingo premises licence when the premises layout at present feels as though it is principally an adult gaming centre. Indeed, the premises is intended to be called 'Merkur Slots'. The supposition must be that this is down to the potential for increasing the number of higher category machines that potentially may be made available by doing so.

There are also areas of the application that are still a little vague or where further information would be helpful.

Accordingly, I would ask for the further additional information

- The numbers and categories of gaming machines that are proposed to be made available upon the premises
- The numbers of bingo tablets that are proposed to be made available upon the premises
- Whether all bingo tablets are proposed to be charged and available for use at all times
- Whether it will be possible for all bingo tablets to be played by seated customers at one time upon the premises
- Whether bingo will be available to play throughout the whole of the proposed operating hours or whether bingo is only available for part of the proposed operating hours
- The numbers of staff intended to be employed at the premises throughout the day and their roles
- What considerations have been given to reduce or deal with local anti-social behaviour that the premises may become a focus just because of its position
- Whether any consideration has been given to the provision of security staff at the premises

- An explanation as to which of the management control proposals put forward together with this application have been offered specifically having given consideration to the local circumstances and local area profile
- Whether the company is prepared to share results of external under-age sales tests carried out other nearby company owned properties and how these compare to the national average
- Whether the company is prepared to share records of incidents recorded at other nearby company owned properties
- Why the company considers that irrespective of the Council's stance on additional gambling licensing premises and local area vulnerability to gambling related harm it is appropriate to position another licensed premises in Heathway

I shall give the application further consideration when this and any other information considered useful is provided.

With thanks.

Richard Parkins | Senior Licensing Officer | Regulatory Services |

Phone: 07814 216592 |

Email: richard.parkins2@lbbd.gov.uk |

London Borough of Barking and Dagenham | lbbd.gov.uk

www.facebook.com/barkinganddagenham@lbbdcouncil

**Barking &
Dagenham**



INVESTORS IN PEOPLE®
We invest in people Gold

