

PREMISES LICENCE GRANT REPORT

Licensing Sub Committee



Date:	17 March 2020
Title of Report:	Grant of a Gambling Premises Licence
Lead Member:	Councillor Sally Haydon (Cabinet Member for Customer Focus and Community Safety)
Lead Strategic Director:	Dr Ruth Harrell (Office of the Director of Public Health)
Author:	Frederick Prout (Senior Licensing Officer)
Contact Email:	Licensing@plymouth.gov.uk
Your Reference:	Merkur Slots
Key Decision:	No
Confidentiality:	Part I - Official

Purpose of the report:

An application has been received from Poppleston Allen Solicitors on behalf of Cashino Gaming Limited in respect of Merkur Slots, 235 Albert Road, Plymouth PL2 1AH for the Grant of a Bingo premises licence under Section 159 of the Gambling Act 2005.

Recommendations and Reasons:

That Members consider this report.

Alternative options considered and rejected:

None.

Relevance to the Corporate Plan and/or the Plymouth Plan:

Our Plan – A City to be proud of.

This report links to the delivery of the City and Council objectives and outcomes within the plan.

A Growing City:

The Gambling Policy and system aims to provide a balance between the need to protect residents and to enable legitimate businesses to operate within a necessary and proportionate regulatory framework. This in turn makes a safer, more vibrant Plymouth to allow economic growth and opportunities for increased levels of employment.

A Caring Council:

The Gambling Policy has put in place an appropriate framework to allow the effective control of gambling to keep all members of society protected and feeling safe by focusing on prevention and early intervention. The licensing system minimise the burdens on business and to allow communities the opportunity to influence decisions.

See [Our Plan](#)

Implications for Medium Term Financial Plan and Resource Implications:

Not applicable

Carbon Footprint (Environmental) Implications:

None

Other Implications: e.g. Child Poverty, Community Safety, Health and Safety and Risk Management:

* When considering these proposals members have a responsibility to ensure they give due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act and those who do not.

Members should be aware that Section 17 of the Crime and Disorder Act 1998 puts a statutory duty on every Local Authority to exercise its various functions with due regard to the need to do all that it reasonably can do to prevent crime and disorder in its area.

Published work / information:

For more information please see the below links.

[Statement of Gambling Policy](#)

[Gambling Act 2005](#)

[Gambling Commission – Guidance for Licensing Authorities](#)

Appendices

Ref.	Title of Appendix	Exemption Paragraph Number (if applicable)						
		1	2	3	4	5	6	7
A	Briefing report (mandatory)							
1	Plan							
2	Notice							
3	Risk assessment							
4	Operating schedule							
5	Representation - resident							
6	Representation – Business interest							

Background papers:

Please list all unpublished, background papers relevant to the decision in the table below. Background papers are unpublished works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based.

Title of background paper(s)	Exemption Paragraph Number (if applicable)
	<i>If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.</i>

	1	2	3	4	5	6	7
Application							

Sign off:

Fin	Click here to enter text.	Leg	3436 4/ag/2 8.2.20 20	Mon Off	Click here to enter text.	HR	Click here to enter text.	Assets	Click here to enter text.	Strat Proc	Click here to enter text.
Originating Senior Leadership Team member: N/A											
Please confirm the Strategic Director(s) has agreed the report? N/A											
Date agreed: Date.											
Cabinet Member signature of approval: [electronic signature (or typed name and statement of 'approved by email') on Cabinet member approval only] N/A											
Date: Date.											

1.0 INTRODUCTION

- 1.1 On the 30 January 2020 the licensing department received an application from Poppleston Allen Solicitors on behalf of Cashino Gaming Limited for the Grant of a Bingo Premises Licence under Section 159 of the Gambling Act 2005 in respect of Merkur Slots situated at 235 Albert Road, Plymouth.
- 1.2 The applicant has provided a plan of the licensed area (Appendix 1)
- 1.3 A Notice of this application has been served on each of the responsible authorities in accordance with regulations made under section 160 of the Gambling Act 2005 (Appendix 2)
- 1.4 The applicant has provided a local area gambling risk assessment (Appendix 3)
- 1.5 The applicant has provided an operating standards document in respect of the licensing objectives (Appendix 4)
- 1.6 Representations have been received in respect of this application

2.0 RESPONSIBLE AUTHORITIES

- 2.1 *Licensing Authority* – no representations
- 2.2 The Gambling Commission – no representations.
- 2.3 *Devon and Cornwall Police* – no representations
- 2.4 *Devon & Somerset Fire & Rescue Service* – no representations.
- 2.5 *Planning Officer* - no representations.
- 2.6 *Environmental Health Officer* – no representations
- 2.7 *Child Protection* – no representations
- 2.8 *H M R C* – no representations

3.0 INTERESTED PARTIES

- 3.1 Two representations have been received from interested parties that are attached to this report (Appendix 5 and 6)

4.0 CONSIDERATIONS

- 4.1 The Committee is obliged to determine this application with a view to promoting the licensing objectives, which are:
 - (a) preventing gambling from being a source of crime and disorder, being associated with crime and disorder or being used to support crime,
 - (b) ensuring that gambling is conducted in a fair and open way,
 - (c) protecting children and other vulnerable persons from being harmed or exploited by gambling

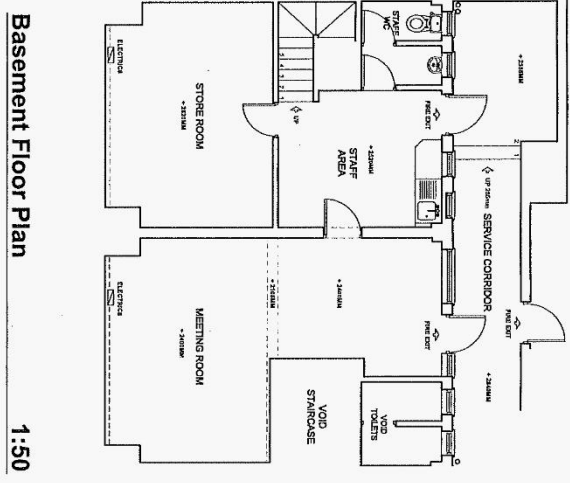
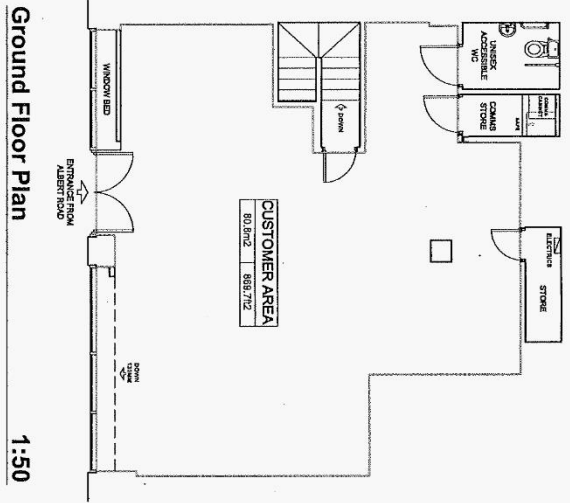
In making its decision the Committee is also obliged to have regard to:

- the guidance issued to local authorities by the Gambling Commission with the following paragraphs being relevant to the application: 1.19, 1.20, 1.23 - 1.28, 1.29, 1.34 – 1.36, 2.15 – 2.20, 4.9 – 4.10, 5.10 – 5.24, 7.3 – 7.4, 7.40 – 7.43, 7.44 – 7.47, 7.52 – 7.55, 7.56 – 7.57, 7.58, 8.9 – 8.15, 9.1 - 9.3, 9.18, 9.18 – 9.23, 9.25 – 9.26, 9.27 – 9.28, 9.31, 9.32, 18.1 – 18.5, 18.6 – 18.7, 18.8 – 18.11 and 18.17 – 18.31.
- the Council's own Licensing Policy with the following headed paragraphs being relevant to this application: Interested Parties (Page 9), Location (page 17), Children and Vulnerable Persons (Page 18), Licensing conditions that may be imposed or not imposed (Page 19), Bingo Premises (Page 22) Application and Plans (Page 24 – 26), Local Area Gambling Risk Assessments (Page 28 – 32)
- the representations (including supporting information) presented by all the parties.

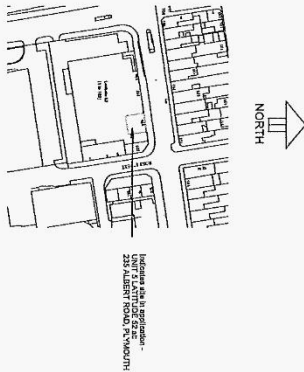
The Committee must take such of the following steps as it considers appropriate for the promotion of the licensing objectives:

1. Grant the licence.
2. Reject the application.

Appendix I



GAMBLING ACT 2005 LICENSING PLAN
 Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for illustrative purposes only, and does not form part of the premises licence



UNIT 5 LATITUDE S2 235 ALBERT ROAD PLYMOUTH	
LICENCE PLAN	
Date: 20/11/2018 Drawn: [Name] Checked: [Name] Approved: [Name]	Scale: 1:50 @ A1 Reason: [Reason] Issue: [Issue]
30 Merruar Slots, The Forum, 100 Victoria Road, Plymouth, PL4 8AG	

NOTICE OF APPLICATION FOR A PREMISES LICENCE

This notice is issued in accordance with regulations made under section 160 of the Gambling Act 2005

Notice is hereby given that **Cashino Gaming Limited**
of the following address -

**Seebeck House
1A Seebeck Place
Milton Keynes
Postcode MK5 8FR**

the number of whose operating licence is: **000-003266-N-103444**

who applied for an operating licence on: **N/A**

has made an application for a **Bingo Premises Licence**

The application relates to the following premises:

**Merkur Slots
235 Albert Road
Plymouth
PL2 1AH**

The application for a premises licence has been made to the following licensing authority:

**Licensing Team
Plymouth City Council
Windsor House
Tavistock Road
Plymouth
PL6 5UF**

Website: www.plymouth.gov.uk

Information about the application is available from the licensing authority, including the arrangements for viewing the details of the application.

The following person connected with the applicant is able to give further information about the application:

**Hannah Worthington
0115 9349 190
Poppleston Allen
37 Stoney Street
The Lace Market
Nottingham
NG1 1LS**

Any representations under section 161 of the Gambling Act 2005 must be made no later than the following date: 26 February 2020

LOCAL GAMBLING RISK ASSESSMENT



Premises Name:	Plymouth		
Premises Address:	Merkur Slots, 235 Albert Rd, Plymouth, PL2 1AH		
Operator Premises Code:	903	Area Manager:	0/ Area:
Category of gambling premises licence:	Bingo	Staffguard System: Y/N	Yes 24 hours opening: Yes
Premises Licence Number:	0		
Local Authority details:	Plymouth City Council		
Name of person completing assessment:	Sue Thomas	Position within Company:	Compliance Manager
Date original Assessment completed:	16/12/2019		
Date of Assessment Review:	15/01/2020		
Reason for Assessment Review:	New Premise Application		

REQUIREMENT TO COMPLY – social responsibility code provision 10.1.1 – with effect from 6th April 2016

All non-remote casino, adult gaming centres (AGC), family entertainment centres (FEC), bingo, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

This risk assessment must be completed based upon the local risks to the licensing objectives posed when applying for a new gambling premises licence and when applying for a variation of a premises licence.

Licenses must review and update their local risk assessment when internal/external changes take place in each of their premises which may affect the mitigation of local risk taking into account significant changes to local area circumstances, including those identified in a licensing authority's statement of licensing policy. Some authorities have included details of their local area profiles, which you can refer to for further information.

Ordinary code provision 10.1.2

Licenses are required to share their risk assessment with Licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

LOCAL AREA PROFILE

Useful websites:

- <https://www.plymouth.gov.uk>
- <http://www.ukcrimestats.com>
- <http://www.gov.uk/government/collections/crime-statistics>
- <https://www.findmyschool.co.uk>
- <https://checkmypostcode.uk>
- <https://postcodearea.co.uk>
- <https://www.google.com/maps>
- <https://www.police.gov>

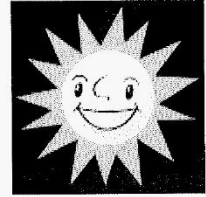
<p>Premises Design and Gambling Operation</p> <p>We have reviewed Plymouth Council statement of principles and reference relevant sections 12.1-12.14 for Adult Gaming Centres. The venue will be fitted with a HD CCTV system that is clearly advertised to customers with screens visible by employees when working in the service area. Floor layout will enable supervision of entrances and machines from the central service area. The premise and employees will be protected by an employee Guard security system and intruder alarms will be installed.</p> <p>Premises Logs - Information pertaining to the Licence Conditions and Codes of Practice will be recorded electronically using the IHL SmartTablet with the data evaluated centrally via the back office.</p> <p>The proposed venue will operate under a Bingo License, with a range of category B3, C and D machines and proprietary bingo equipment.</p> <p>Premises frontage will be of a style which obscures the interior with appropriate advertising inline with Licence Conditions and Codes of Practice.</p> <p>External windows will have digital marketing screens which will display safer gambling messages, Think 25, Bingo Played Here, opening times and promotional activity.</p>	<p>Local Risk The venue is located on a section of road within a mainly residential areas where there are a selection of retailers, service providers and fast food outlets. The venue is within a fairly new development with commercial properties on the ground floor and residential apartment about it. The unit next to it is currently unoccupied and the other side is Latitude52Plymouth - letting agents for the residential accommodation. There are 2 local Public Houses - Keyham Vaults and The Complex both open from 11am until 11pm later until 12:30 over the weekends. 2 residential assisted living for the elderly are close by. Using data from the 2011 Census the area comprises 53% social housing which is 18% higher than the national average, 93% of the area are described as 'white' with 78% in V good or good health. The main religion is Christian at 42% with No Religion next 25%. There are 2 railway stations close by - Devonport 300yds and Docklands 400yds. 10 primary schools are within 1 mile of the venue Morice Town 390yds, College Rd 700yds and Stoke Damerel, St Josephs Catholic and Mariborough up to 800yds. 4 Secondary schools are within 1 mile UTC Plymouth 130yds at the end of Ross Street with pupils from the age of 14, Devonport High School for boys 0.6 mile and Stoke Damerel Community Collage and Scott Medical and Healthcare collage 0.7mile. Plymouth Navel Base is a 15-20 minute walk away.</p>	<p>Local Crime Analysis (police.uk)</p> <p>We have reviewed the Police.UK hot-spot mapping for the area and we are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with local police over reducing our involvement in any incident. For the year ending June 2019 crime in the local area was around 9% - 1-2% lower than the national average for similar areas, currently in place is a PSPO On Street Drinking Ban covering the whole of the Devonport area, this came into effect July 2019.</p>	<p>Assessment of premises incident records (Past 12 Months)</p>
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The Gambling Act 2005 sets out the three licensing objectives (LO), which are:
 CD - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
 FO - Ensuring that gambling is conducted in a fair and open way.
 CV - Protecting children and other vulnerable people from being harmed or exploited by gambling.

LO	Local Risk Detail	Degree of Risk (Severity vs Likelihood)	Control Measures	Updated
CD	Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.	Moderate	<p>Systems: employees trained on the requirements to comply with the Money Laundering Regulations and the Company AML Policy. Customer interaction used to identifying potential suspects, behaviour, spend patterns and the use of change machines.</p> <p>Designs: Open design with vision across the venue floor.</p> <p>Physical: IHL Smart Tablet to record incidents with emails direct to the AMLIO tablet. Shared security alerts and photos of suspects with operators nationally. CCTV systems available for additional monitoring of activity. MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.</p>	Jan-20
CD	Poor security control measures which may increase vulnerability to crime	Low	<p>Systems: Security Alert system allows the sharing of information on criminal activity across all venues and relevant employees. Key management policy in place. Regular checks on Emergency exits and equipment. Extensive monitoring of employees and customer activity from Audit Department.</p> <p>Designs: Open design with vision across the venue floor</p> <p>Physical: Staffguard security system. HD CCTV system installed with remote viewing available. Time lock safe installed. Monitored intruder alarm system installed. Machine data monitoring in MARS.</p> <p>Systems: employee training on how to deal with aggressive customers and situations which may also require police assistance.</p>	Jan-20
CD	To identify aggressive customers to prevent crime and disorder (will be dependent on customers who frequent premises)	Low	<p>Designs: Open design with vision across the venue floor.</p> <p>Physical: Smart Incident app on the IHL Tablet used to record all incidents inc. crime reference number, supporting emails and back office report monitoring. Security Group email in operation inc. BACTA alerts.</p>	Jan-20
CD	Awareness of local crime issues in the local area	Low	<p>Systems: Annual LARA review, policies and procedures for communication of change in local issues. Reference to https://www.police.uk, http://www.ukcrimestats.com, http://www.gov.uk/government/collections/crime-statistics.</p> <p>Designs:</p>	Jan-20
CD	Failure to protect employee and customers from harm during the hours of late night opening	Low	<p>Physical: Membership of local Town Radio schemes where available. Security group email alerts.</p> <p>Systems: Lone working and night working procedures in place. Use of locked Door policy. Full time Support Night Manager available throughout the night.</p> <p>Designs:</p>	Jan-20
FO	Failure to prevent customers complaints and disputes regarding gambling within our premises.	Low	<p>Physical: Night Time contact number. HD CCTV system. Staffguard Security System.</p> <p>Systems: Management and monitoring of reported faults via MARS. Machines maintained by trained persons. Machine standards audited on regular basis. Gaming rules prominently displayed at entrance to each venue. Employees have full understanding of machine gaming rules. Machine Standards Policy in place.</p> <p>Designs: Stakes, prize levels and % payouts are clearly displayed on all machines.</p> <p>Physical: Gambling machines comply with technical standards and are acquired from licensed suppliers only.</p>	Jan-20

FO	Failure to resolve customers complaints and disputes regarding our gambling premises.	Low	<p>Systems: Complaints management policy in place for written and telephoned complaints. Compliants portal used to collate and manage responses. 4 stage complaints procedure with ADR entry independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Employees encouraged to use positive discretion to resolve customer issues in venue.</p> <p>Designs: Physical: Code of Practice and Complaints and Disputes policy displayed at venue entrance. Complaints and Disputes policy leaflets available within the venue.</p> <p>Systems: Proof of Age scheme in place with application forms available in the venue. 3rd party company - Check Policy employed for underage verification testing. Persons who are unable to provide proof of age are refused entry.</p>	Jan-20
CV	Ensuring Under 18's do not have access to licensed premises	Low	<p>Designs: Think 25 policy and posters are displayed at entrance and within the premises. Think 25 badges form part of employee uniform. Entrance door signage and machines display 'No Under 18's'. Marketing and Promotions complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice.</p> <p>Physical: Age verification app on the IHL tablet used to record all Age verification challenges. All entrances and venue floor are monitored by employees.</p> <p>Systems: employees trained on customer interaction and how to identify and interact with players who exhibit signs of developing problem gambling, identifying players whose behaviour changes.</p>	Jan-20
CV	To identify signs associated with problem gambling and people who may be at risk of gambling related harm	Moderate	<p>Physical: Playright App available in venues to assists players with managing their gambling. IHL tablet used to record all incidents of customer interaction with email alerts to Compliance Manager who has access to back office for additional monitoring.</p> <p>Systems: Employees are provided with the training to enable them to provide guidance on safer and responsible gambling.</p>	Jan-20
CV	Failure to provide information to customers on responsible gambling	Low	<p>Designs: Stay In Control posters and leaflets promoted at venue entrance, within the venue and in washroom areas.</p> <p>Physical: Socially Responsible messaging is implemented on B3 and digital Cat C machines. All machines display Gamble Responsibly stickers with helpline contact details.</p>	Jan-20
ALL	Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews	Low	<p>Systems: Essentials of Compliance and Safe Guarding Vulnerable People Induction training and 6 monthly refresher training for all employees. This training includes administering the self exclusion process and interacting with players. Central monitoring of all exclusions, breaches, reinstated customers and customer interactions by Compliance Manager.</p> <p>Designs: Tablet available for use of all employees.</p> <p>Physical: Self exclusions logged on IHL Tablet Smart App. Information is shared across all operators. Members of Bingo Association Multi-operator Self Exclusion scheme.</p>	Jan-20
ALL	Training & Social Responsibility		<p>Systems: Essentials of Compliance, Safeguarding and lone working trained on Inductions and refreshed 6 monthly for all employees. Compliance Manager attendance at Manager Meetings for refresher and update training. Review of all logs on IHL back office to identify and promptly target venues where changes are exhibiting.</p> <p>Designs: On-line training platform and two regional training centers.</p> <p>Physical: Compliance and Social Responsibility Folder with all policies and procedures available to all employees. Venue Managers review logs monthly. Area Managers Bi monthly and Compliance Audits twice yearly.</p>	Jan-20

Cashino Gaming Limited Operational Standards



THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

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

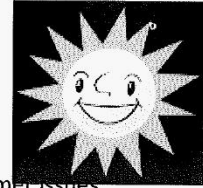
Objective 1 - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

- Cashino Gaming Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Cashino Gaming Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Cashino Gaming Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Cashino Gaming Limited premises operate digital CCTV and customer areas are supervised.
- Cashino Gaming operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- The employees in Cashino Gaming premises are required to carry a portable alarm which is provided by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Cashino Gaming Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Cashino Gaming employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Cashino Gaming operate a robust late night working policy, which is fully supported by a full-time Night Manager.
- Cashino Gaming do not operate a single-manning policy between 8pm and 6am, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

Objective 2 - Ensuring that gambling is conducted in a fair and open way.

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.

Cashino Gaming Limited Operational Standards

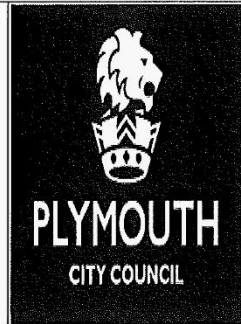


- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our appointed Alternate Dispute Resolution provider (IBAS).
- All venue managers attend our National Training Centre for a thorough induction programme prior to taking on responsibility of their own venue and team.
- All licensed premises employees receive induction and six-monthly refresher training during the course of their employment to ensure that potential issues can be addressed at the earliest opportunity.

Objective 3 - Protecting children and other vulnerable persons from being harmed or exploited by gambling

- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer is under age. All challenges are recorded on our Smart Tablet system under Age Verification Checks and Check Policy are our third-party independent partner for compliance testing.
- All licensed premise employees receive induction and six-monthly refresher training during the course of their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.
- We prominently display information throughout our licensed premises on responsible gambling and provide details of organisations that can provide support and guidance such as BeGambleAware.
- Playright is installed in all licensed premises - this is a self-help App available to customers to enable them to manage spend and play time.
- Socially Responsible messaging is implemented on B3 and Category C digital machines.
- All licensed premise employees are trained to identify potential at risk customers and conduct effective interactions. Customer interactions are recorded on the Interactions module on the electronic Smart Tablet and reviewed centrally by the Compliance team.
- We implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.
- The layout of our premises is designed to facilitate customer supervision by employees.
- We provide an annual donation in support of research, education and treatment of problem gambling.

All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.

LICENSING REPRESENTATION**Case reference: FS-Case-173369971**

Premises	
Name of the premises:	Merkur Slots
With regard to the following application I want to:	Object
Premises address:	235 Albert Road, Plymouth, Devon, PL2 1DJ
Representation	
In what capacity are you applying:	Any other person

div>

Name:	Miss Charlotte Walton
Telephone number:	
Mobile number:	
Email address:	
Address:	
Representation details	
Whick of the following Licensing Objectives is this representation relevant to:	A. The prevention of crime and disorder,C. The prevention of public nuisance

Please explain the likely effect the granting of the application would have on the promotion of the above Licensing Objectives:	I live directly above the premises that Cashino Gaming Ltd has applied for a gaming licence for. The shop front was previously a Ladbrokes betting shop and there was a constant hub of people smoking outside the shop, which prevented me from being able to have any windows in my flat open due to the smell. There were cars parked on the pavement outside the shop and the noise from people leaving and entering until the late evening was disturbing. As a premises that has slot machines, my fear is that the same pattern will occur. There is already a slot machine shop within a mile of this proposed business. We live in what is supposed to be a regeneration area, cleaning up this area should be a priority, but having this type of business will not assist with that. It will not as far as I can see benefit the local area/economy in any way.
Is there any reason why you do not want your personal details to be passed on to the premises licence holder:	Yes
Provide reasons:	I am a female living on my own, I don't want strangers having my address and name.
Number of documents in support of your representation uploaded:	0
Declaration	
By submitting this form I declare that I have read the representation guidance notes and agree that a copy of my representation will be given to the licence premises owner:	
I confirm I have read the representation guidance notes and agree that a copy of my representation will be given to the premises licence holder.	
Signed:	Charlotte Walton
Date:	08/02/2020

07955 829430

Appendix 6

Licensing Department
Plymouth City Council
Windsor House
Plymouth PL6 5UF.

Dear Sirs,

Re: 235 Albert Road – Bingo Licence Application.

Please can the following be brought to the attention of the Licensing Committee in determining the above application:

1. We are concerned this application is really not for a Bingo club but rather a Slot Machine Arcade. The applicant's website clearly shows this is the main focus of their business. Many of their arcades operate 24 hours a day 7 days a week. Evidence of this can be found on their website.

Bingo premises have by their nature to be large properties to accommodate seating for bingo and facilities for eating and drinking together with a limited area for slot machines. The application premises are small with an internal area of around 88 square metres.

Can this small shop be really intended for bingo players? Think of the size of Mecca Bingo in Devonport or Buzz Bingo in the City Centre.

This is an Amusement Arcade being disguised as a bingo premises to make it appear more acceptable.

2. The premises do not have planning permission for the proposed use.

3. The UTC College is situated extremely close to the application site. Whilst the proposed slot machines are not permitted to be used by children it would be a temptation for youngsters walking past daily going to and from school.

4. Established policies indicate Amusement Centres should not be permitted close to premises frequently used by young people. Protecting young people are grounds for refusing the application. This is an area of great concern to the Gambling Commission.

5. We operate an Adult Gaming Centre some 500 metres to the East of the application site (Boosters, 41-43 Marlborough Street). This has been in our ownership for 35 years and is an established part of the local community. There is another locally owned Adult Gaming Centre some 500 metres to the West of the application site (Winners, 200 Keyham Road).

Slot machine gaming is therefore already well catered for in this area.

The surrounding area is largely consisted of social housing with low income and a high unemployment level. As a local operator we are used to working in this environment and voluntarily restrict opening hours and the numbers of high roller £500 jackpot machines.

This National operator would merely seek to extract maximum income from the local community and run.

We therefore respectfully request you reject this application.

Richard Triscott