

PREMISES LICENCE GRANT REPORT

Licensing Sub Committee



Date:	08 May 2024
Title of Report:	Grant of a Gambling Premises Licence - Moneykingcasino
Lead Member:	Councillor Sue Dann (Cabinet Member for Customer Services, Sport, Leisure and Human Resources and Organisational Development)
Lead Strategic Director:	Dr Ruth Harrell (Office of the Director of Public Health)
Author:	Marie Price (Senior Licensing Officer)
Contact Email:	Licensing@plymouth.gov.uk
Your Reference:	Moneykingcasino
Key Decision:	No
Confidentiality:	Part I - Official

Purpose of the report:

An application has been received Hough & Bollard Ltd on behalf of Moneycasino Ltd in respect of Moneykingcasino. Unit 2, 52-56 Embankment Road, Plymouth. PL4 9HY for the Grant of an Adult Gaming Centre 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 Licensing 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 Licensing Policy has put in place an appropriate framework to allow the effective control of alcohol supply and regulated entertainment 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

Financial RisksNot Applicable

Carbon Footprint (Environmental) Implications:

No direct carbon/environmental impacts arising from the recommendations

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

* 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							

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)						
	1	2	3	4	5	6	7
Application							

Sign off:

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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.											

INTRODUCTION

- 1.0 On 8th March 2024 the licensing department received an application from Hough & Bollard Ltd on behalf of Moneycasino Ltd for the Grant of a Premises Licence under Section 159 of the Gambling Act 2005 in respect of Moneykingcasino situated a Unit 2, 52-56 Embankment Road, Plymouth. PL4 9HY.
- 1.1 The applicant has provided a plan of the licensed area (Appendix 1)
- 1.2 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)
- 1.3 The applicant has provided a local area gambling risk assessment (Appendix 3)
- 1.4 The applicant has provided a compliance policy document in respect of the licensing objectives (Appendix 6)
- 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 Local Councillors that are attached to this report (Appendix 4 & 5)

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

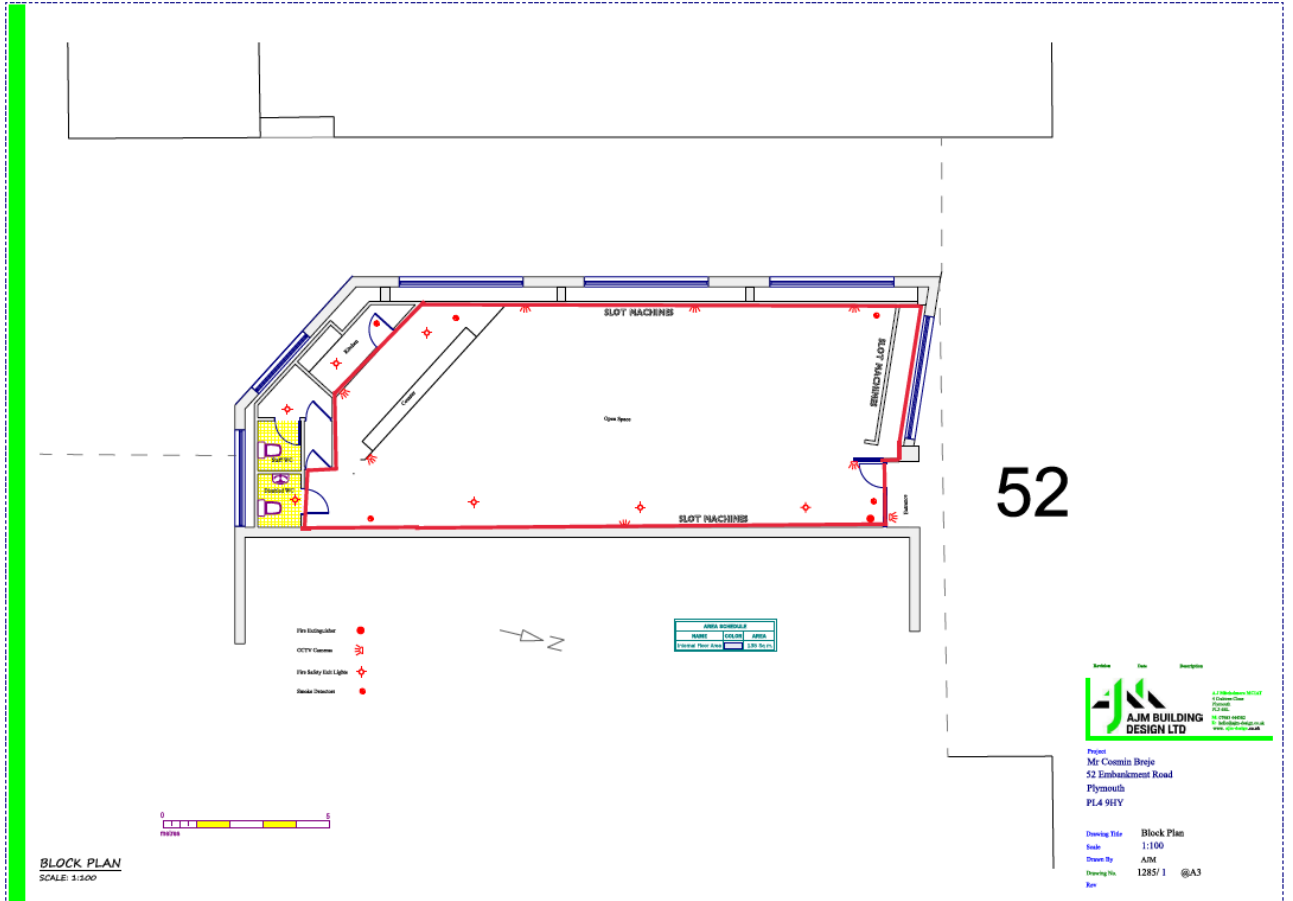
In making its decision the Committee is also obliged to have regard to:

- the guidance issued to local authorities by the Gambling Commission with the following paragraphs being relevant to the application: 1.19, 1.20 - 1.21, 1.13 - 1.29, 1.31 - 1.34; 1.36 - 1.38, 2.15 - 2.20, 4.9 - 4.10, 5.11 - 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, 9.19 - 9.24, 9.25 - 9.26, 9.27 - 9.31, 9.32, 21.1 - 21.12
- the Council's own Licensing Policy with the following headed paragraphs being relevant to this application: Interested Parties (Page 9), Location (page 20), Children and Vulnerable Persons (Page 21), Licensing conditions that may be imposed or not imposed (Page 22-23), Adult Gaming Centre ((page 23 - 24) Application and Plans (Page 28 - 29), Local Area Gambling Risk Assessments (Page 31 - 34)
- 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





Appendix 2

NOTICE OF AN 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 Moneycasino Ltd

of the following address: 34 Frobisher Approach Plymouth

Postcode: PL5 3UD

the number of whose operating licence is: 000-060782-N-335630-003

has made an application for an AGC premises licence.

The application relates to the following premises: Moneykingcasino Unit 2 52-56 Embankment Road Plymouth PL4 9HY

The application for a premises licence has been made to the following licensing authority: Plymouth City Council Windsor House Plymouth

Postcode: 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: Debbie Bollard of Hough & Bollard Ltd 01526 341162 debbie@houghandbollard.co.uk

Any representations under Section 161 of the Gambling Act 2005 must be made no later than the following date: 4 April 2024

Appendix 3

LOCAL GAMBLING RISK ASSESSMENT

Premises: Moneykingcasino Unit 2 52-56 Embankment Road Plymouth PL4 9HY

Operator: Moneycasino Ltd

Operating Licence: 000-060782-N-335630-003

Prepared by: Debbie Bollard

Date: 8 March 2024

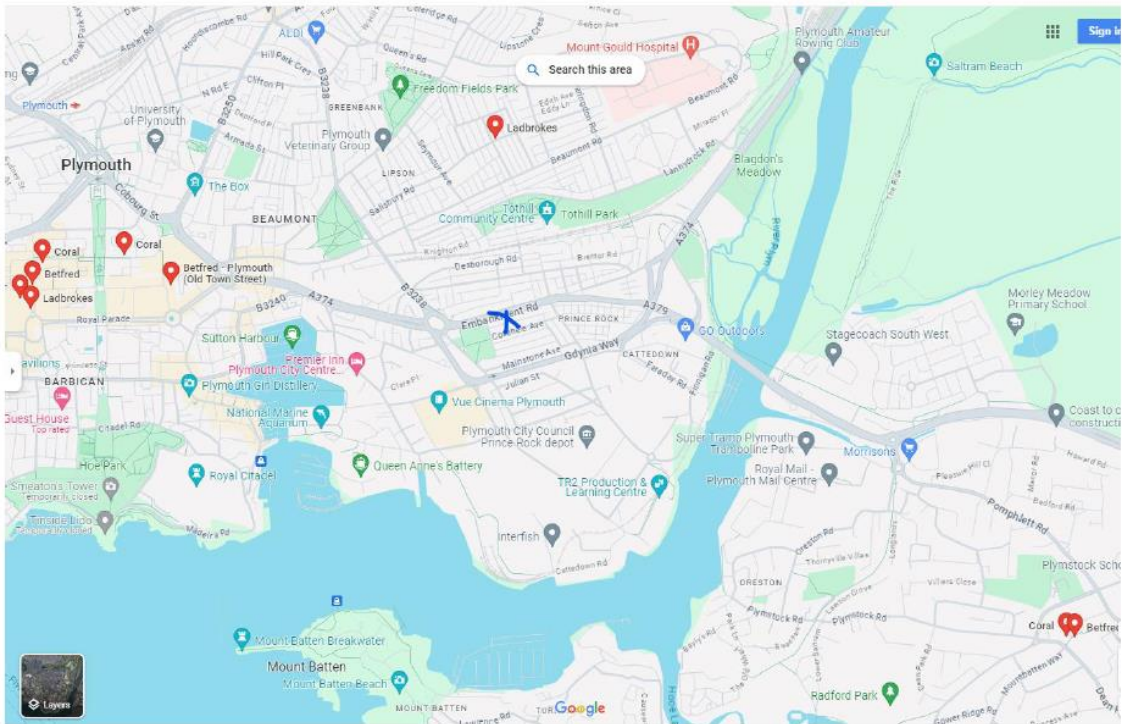
Local Area Profile: The arcade is situated in a single storey premises previously operated as a Betting Office. It has one entrance onto the main road with a good line of site from the staff counter and is also monitored by CCTV.

The premises are located in the East End neighbourhood which is the 6th most deprived in the city (of 39). It is sited on a busy road, set back beside a mini deli in a long row of other retail premises including groceries, hardware, takeaways, and personal care salons with some residential above. The opposite side of the road is also given over to residential including HMOs. There is an ATM at Your Local 34-42 Embankment Road.

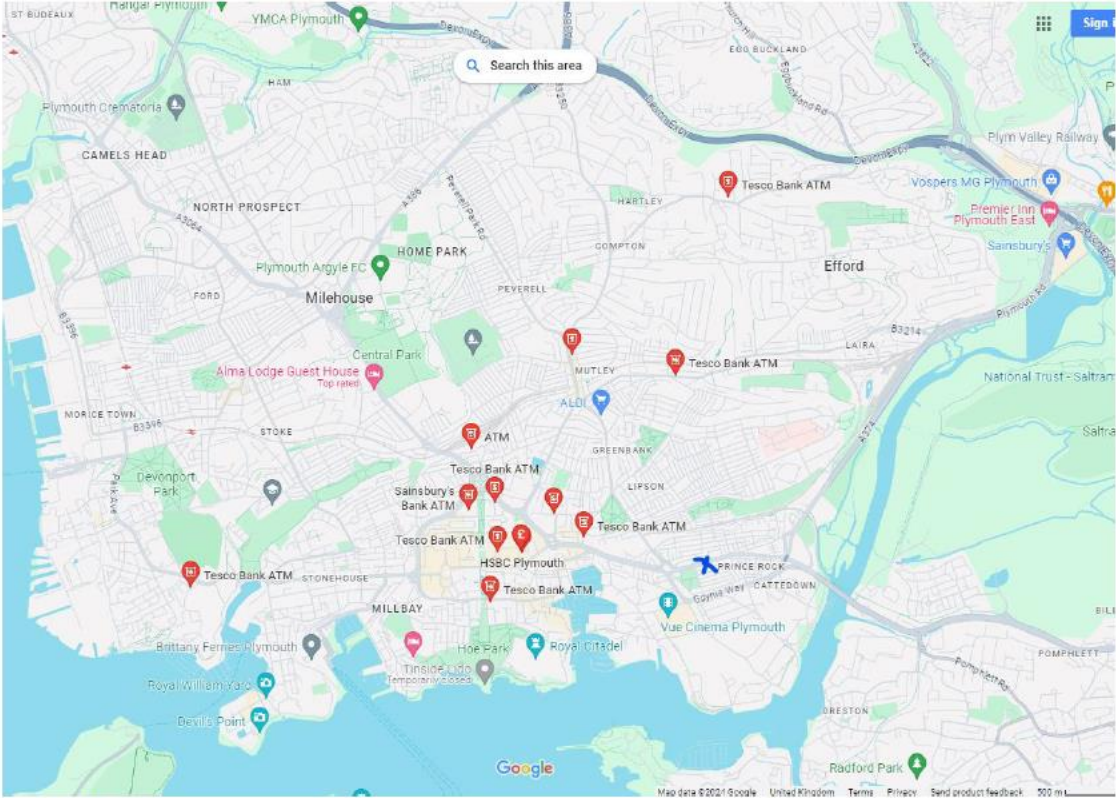
According to Plymouth CC data there are 28 betting shops, 7 AGCs, 3 bingo halls, and two casinos in Plymouth. However there are no other AGCs in the immediate vicinity, Buzz Bingo & Slots is 0.7 miles away on Charles Cross Roundabout; the nearest betting shop is Ladbrokes on Craven Avenue 0.6 miles away, and Betfred on Old Town Street 0.9 miles away.

The nearest Primary School is Prince Rock Primary School (0.3 miles) and Holy Cross Catholic Primary School on Beaumont Road (0.6 miles); the nearest secondary schools are Plymouth High School for Girls a mile away on St Lawrence Road and Millbay Academy on Millbay Road which is 1.6 miles away.

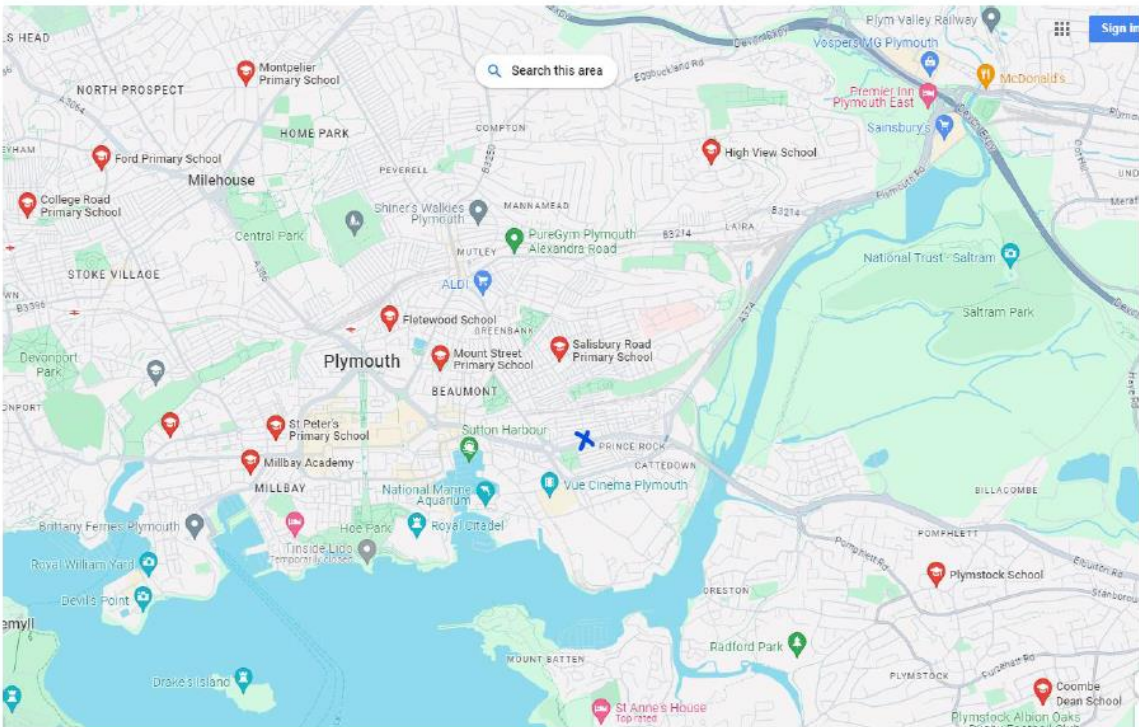
The Harbour Drug & Alcohol Service addiction centre is 1.3 miles away and Restart Recovery Houses 1.7 miles away



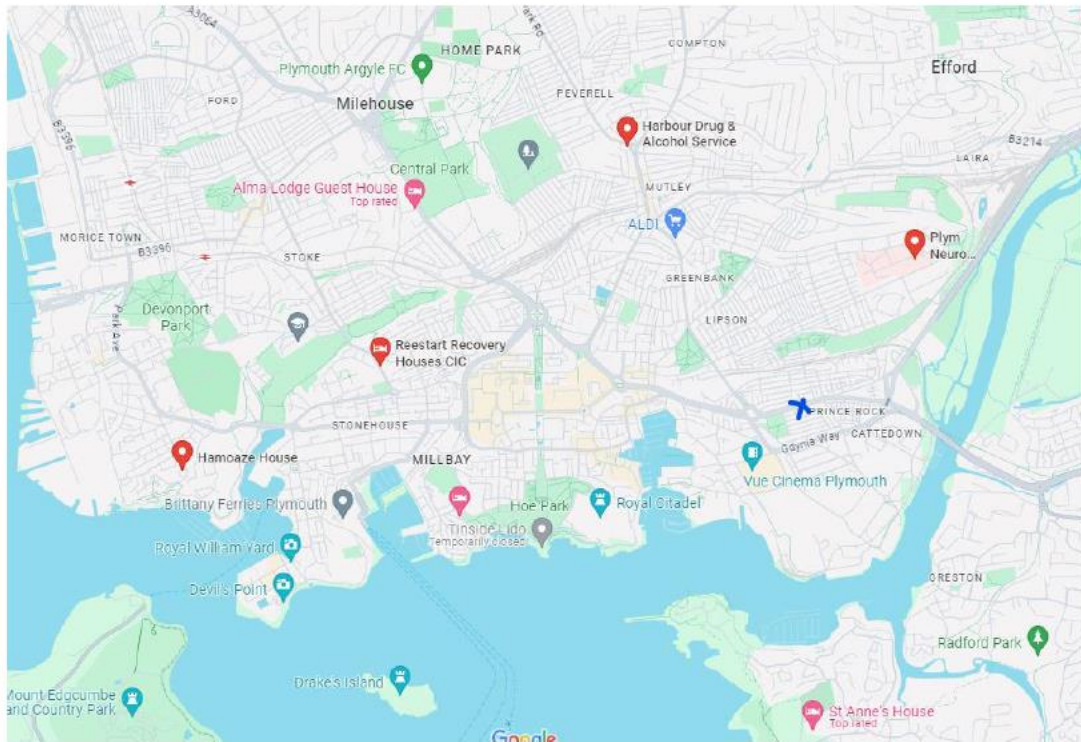
Betting shops



Banks & ATMs



Schools



Rehabilitation Centres

RISKS	LEVEL	IMPACT	RISK MANAGEMENT	DATE REVIEWED
Children entering the site unnoticed or unchallenged	Low	Severe to business Severe to child	There is one entrance monitored from the desk with clear line of sight. Entrance is designed not to be attractive to children CCTV coverage of site Think 25 Policy in place and implemented and regularly reviewed; regular staff training; Clear and prominent premises signage and machine labelling	
Out of control gambling by other vulnerable people	Low	Moderate to business Severe to vulnerable	The company has a well designed customer interaction policy & procedures in place Staff trained on policies & procedures in induction and annually Layout of shop designed to effectively monitor all customers	
Failure to deal with customers making complaints about the	Moderate	Moderate to business Severe to customers	Machines supplied by licensed operators Machines regularly maintained and switched off immediately a gambling fault is identified Staff trained on dealing with customer disputes, including referrals to ADR scheme	
Failure to provide information on responsible gambling to players	Low	Severe to business Severe to customers	The company displays stay in control information in poster & leaflet format Leaflets are made available to all customers including in discreet locations Stock levels of posters and leaflets checked regularly and reordered	
Failure to recognise signs associated with problem gambling or substantial changes in gambling style	Moderate	Severe to business Severe to customer	Staff trained to interact with customers on a daily basis to get to know them Training on identifying signs of problem gambling and interaction techniques Site layout designed to monitor all machines and customer behaviour	
Failure to properly administer the self-exclusion process & maintain its effectiveness, including breaches & reinstatements	Low	Severe to business Severe to customer	CCTV at entrance to help identify known excluders Site layout designed to monitor customers entering premises Use of on-site & BACTA self-exclusion schemes Regular review of self-exclusion data	

<p>Failure to identify attempts by third parties to launder money through the business</p>	<p>Low</p>	<p>Severe to business Low to customers</p>	<p>Effective monitoring of customers' behaviour by good line of sight from desk and CCTV Staff are regularly trained to identify counterfeit money Change machines & note takers regularly inspected</p>
<p>Poor security increasing vulnerability to crime</p>	<p>Low</p>	<p>Severe to business Severe to customers</p>	<p>Minimum 2 staff at any time Intruder alarm installed and regularly serviced Maglock on door and in operation 2000-0800 Effective CCTV with data stored for 30 days Toughened glass windows and doors Safe on site for cash and keys All incidents recorded in incident log</p>
<p>Awareness of heightened local crime</p>			<p>No crimes have been reported in this area since January 2023 which is probably not the true picture https://www.police.uk/pu/your-area/devon-and-cornwall-police/east-end/?yourlocalpolicingteam=about-us&tab=statistics Monitor: www.police.uk, ukcrimestats.com, www.gov.uk/government/collections/crime-statistics</p>
<p>Awareness of student learning facilities (schools & colleges) in the nearby vicinity in the nearby vicinity</p>			<p>See map of nearby schools Consideration given to internal layout so as to ensure effective monitoring of customers entering the premises and those that might enter that could be underage.</p>
<p>Awareness of residential facilities for the vulnerable in the nearby vicinity</p>			<p>None in the immediate vicinity nearest 1.2 miles Consideration given to internal layout so as to ensure effective monitoring of customers entering the premises and those that might enter that could be vulnerable Staff trained to be vigilant to vulnerable people entering the premises</p>
<p>Gambling care facilities in the nearby vicinity</p>			<p>See map of nearby centres www.gamcare.org.uk www.gordonmoody.org.uk 08088020133</p>

Appendix 4

From: [Sue Dann](#)
To: [Marie Price](#); [Mary Aspinall](#)
Subject: RE: Gambling Act - Premises Applications
Date: 02 April 2024 16:18:57

OFFICIAL

Thank you Marie

I would like to register an objection to the change of licence for these premises

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- The change from betting shop to a place where there will be numerous slot machines will change and increase the footfall on the premises, there will be more people for a longer period of time accessing the premises. There is likely to be a change in the demography of the person attending too and they will stay longer especially as there is a request for longer opening hours. High possibility that there could be an increase in anti-social behaviour which is already an issue in the area.
- Increase in noise and general activity in a residential area, there are flats above all the shops, a row of houses just down the road and behind the premise is a back lane which runs to the rear of many houses that already have to put up with ASB in the lane.
-
- There is currently ASB in the area and around Astor Park. The police are not supporting the change of the licence.
- The premise is really close to a school, there would need to be restricted hours of opening to protect and safeguard children if this was to be passed, it is also a reason for an objection.
- There is a need if this goes through to have some strong conditions attached on managing out any criminal/antisocial behaviour, security, opening hours and safeguarding of young people.

Thank you Regards

Clr Sue Dann

Appendix 5

From: Mary Aspinall

Sent: Thursday, April 4, 2024 5:28 PM

To: Marie Price <Marie.Price@plymouth.gov.uk>

Subject: Moneykingcasino Unit 2, 52-56 Embankment Road - AGC Premises Application

OFFICIAL:SENSITIVE

Afternoon Marie

I would like to register an objection to the change of licence for these premises

- The change from betting shop to a place where there will be numerous slot machines will change and increase the footfall on the premises> There will be more people over a longer period of time accessing the premises. There is likely to be a change in the demography of the people attending too and they will stay longer especially as there is a request for much longer opening hours.
- High possibility that there could be an increase in anti-social behaviour in the area, which is already causing a problem in the locality.
- Increase in noise and general activity in this residential area, there are flats above all of the shops, a row of houses just down the road. Behind the premise is a service lane which runs to the rear of many houses that already have to put up with ASB in the lane. I would request a review of the proposed opening hours.
- There is currently ASB in the area and around Astor Park.
- I note that the police are not supporting the change of the licence.
- The premise is really close to a school , there would need to be restricted hours of opening to protect and safeguard children if this was to be passed, it is also a reason for an objection.
- There is a need, if this goes through, to have some strong conditions attached on managing out any criminal/antisocial behaviour, security, opening hours and safeguarding of young people and vulnerable adults.

Regards