



Elections and Regulatory Services

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Private & Confidential

Mr Richard Bradley
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By email: [REDACTED]

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Your ref: [REDACTED]

27th August 2020

Dear Mr Bradley

Merkur Slots, 377-379 Harehills Lane, Leeds, LS9 6AP
Application for a gambling premises licence under the Gambling Act 2005
Licensing Authority Letter of Representation

Thank you for submitting your application for a gambling premises licence for the above premises on behalf of Cashino Gaming Limited.

I note that your application is for a licence to authorise the provision of bingo. The bingo licence will also allow the provision of gaming machines.

I have read through the application, including the local area risk assessment and I am pleased that the number of gambling premises already operating in the area has been taken into consideration, as well as procedures for the prevention of harm to children and vulnerable people. However there is area specific data available that should also take into consideration.

Lower Layer Super Output Areas are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. An LSOA is a designated area in which 1500 people live. Public Health have produced and maintain a licensing matrix which rank LSOAs (lower level super output area) against each other.

By entering the relevant postcode the matrix displays its ranking against licensing related data sets. This allows responsible authorities and the licensing authority to establish the problems being experienced in the area.

The Licensing Authority has reviewed the postcode where this premises is situation, LS9 6AP.



LS9 6AP is within the Bellbrooke Ave, Kimberley Road, Comptons. This area is ranked as follows:

Dataset	Ranking out of 482
Deprivation score	15
Population 16 and under	11
Looked After Children	1
Young people Not in Education Employment or Training (NEET)	40
Youth offences	87
% DID NOT achieve grade 9-5 in Eng and Maths Leeds schools	39

This table shows that this area is highly ranked for deprivation, scored at 15 out of 482 areas within the Leeds boundary.

It also shows this specific LSOA has an unusually high number of vulnerable children resident in the area. It is ranked the highest LSO in Leeds for looked after children, very high for children under 16, high for children who are considered NEET (not in education, employment and training), youth offences and low educational attainment.

In addition this area is ranked high for density of off licensed premises (22), alcohol related anti-social behaviour (41), alcohol flagged violent crime (14), drunk and disorderly (21) and for clients who use alcohol services (53). This leads to a view that this area not only has a high number of vulnerable children, but also potentially vulnerable adults.

You have already identified 8 other gambling premises in the area. Although I am aware that the licensing authority is not able to consider demand or need when determining your licence application, I am concerned that your risk assessment does not take into consideration the high number of vulnerable children and adults and alcohol related antisocial behaviour, disorder and crime in an area which is one of the most deprived in Leeds.

The result of this application, if successful, would provide the opportunity for persons to access a high quantity of gaming machines, in comparison to those available in betting offices. Whereas a betting office may provide 4 gaming machines of category B2 (£2/£500 payout), B3, or B4, a bingo premises may site B3 (£2/£500 payout) and B4 (£2/£400 payout) machines at a max ratio of 20% of the total number of machines available for use. Your indicative plan shows places for 30 machines in total.

Adding another gambling premises to this area, especially one which will have a large number of Category B, C and D gaming machines, will not protect children and vulnerable people but be a considerable risk of harm. It is difficult to see how your responsibilities under the Gambling Act and the Licence Conditions and Codes of Practice to protect vulnerable people can be met given the area profile.

In addition by placing such a premises in this area there would be a potential long term risk to vulnerable children, who would see the premises regularly and therefore could consider gambling activities, especially gaming machine usage, to be a part of normal adult life.

Therefore the licensing authority submits a formal representation to your application on the grounds of the protection of children and vulnerable persons and will recommend to the licensing sub-committee that this application is refused.

Should you have any questions, please contact us.

Yours faithfully



Susan Duckworth
Principal Licensing Officer
Entertainment Licensing

Additional Evidence in support of Licensing Authority Representation

Introduction

The proposed Merkur Slots premises is within the Burmantofts and Richmond Hill ward which has a population of 26,255 people. Where possible, data has been provided at smaller geography levels to highlight the evidence in close proximity to the proposed premises in comparison to the Leeds city wide average. The smaller geographies are referred to in this report as neighbourhoods and areas. The neighbourhood is known as Bellbrooke Avenue, Kimberley Road and Comptons and has a population size of 2,336 people; the wider surrounding area is known as Comptons, Sutherlands and Nowells and has a population size of 8,321.

Data available at the neighbourhood, area and ward level has indicated the proposed premises is in a location with a high proportion of at risk and vulnerable communities, groups and individuals.

If the licence is approved, the council would expect Merkur Slots to understand the concerns raised in this report, engage with support services in the city and be able to mitigate any harm to vulnerable customers and those at risk of gambling related harm.

A summary of the key evidence in this report

Rates of problem gambling in Leeds are known to be twice that of national estimates in both adults and children. There are an estimated 10,000 problem gamblers across Leeds and a further 30,000 adults are at risk of gambling related harm. 24% of Leeds school children have taken part in gambling activity and bingo is the second most popular form of gambling amongst secondary aged pupils.

Research referenced in this report suggests the following groups are linked to being vulnerable to gambling related harm:

- Those living in areas of greatest deprivation
- Adults living in constrained economic circumstances
- Those who have been through the criminal justice process
- Young people (including students)
- Black and Asian minority ethnic groups
- Adults with mental health issues
- Immigrants

In relation to these vulnerability factors and the proposed location of Merkur Slots, this report would like to highlight the following evidence:

- Burmantofts and Richmond Hill contains 15 neighbourhoods that rank within the 10% most deprived neighbourhoods in England.
- Merkur slots would be located in a neighbourhood that is ranked in the 3% most deprived neighbourhoods in England and is the 17th most deprived neighbourhood in Leeds.
- Rates of crime and anti-social behaviour are high within the surrounding neighbourhood when compared to the city average.
- 14.3% of adults in the neighbourhood are out of work benefit claimants, compared to 6.8% in Leeds overall.
- Almost 57% of children in the neighbourhood are living in poverty, compared to the Leeds rate of 23%.

- The area has 39% of its community from non-white British ethnicities, above the city rate of 18.9%. A large proportion of the non-white community are Black British African and Asian British Pakistani.
- The GP recorded Common Mental Health Rate is 23,237 for the ward - above the Leeds rate of 22,361 and the Severe Mental Health Rate is 1,446 – again, higher than the Leeds rate of 1,321.
- The area around the proposed premises is also quite transient with new communities developing with a high proportion of National Insurance registrations from Romanian and Polish immigrants.

Problem Gambling in Leeds

Problem gambling is gambling to a degree that compromises, disrupts or damages family, personal or recreational pursuits. “At risk” generally refers to people who are experiencing some difficulties with their gambling behaviour but are not considered to be problem gamblers.

The latest national data from 2019 suggests 0.5% of adults in England identified as problem gamblers and 3.5% were at risk of developing problems with their gambling. The national Young People and Gambling Survey from 2019 revealed that 11% of 11-16 year olds had gambled and 1.7% were problem gamblers.

In 2016, Leeds City Council commissioned Leeds Beckett University to conduct a study into the prevalence of problem gambling in Leeds. The research estimated that in Leeds and cities like Leeds that the prevalence is likely to be around double the national rate due to factors such as the demographic make-up and number of licensed premises.

The study revealed for Leeds that there are approximately 10,000 problem gamblers (1.8% of the adult population) and a further 30,000 people (5/6% of adult population) who may be at risk of harm from gambling.

The research also highlighted that whilst problem gambling can affect anyone at any time, there are certain groups are more vulnerable to gambling related harm;

- Young people (including students)
- Adults living in constrained economic circumstances
- Certain minority ethnic groups
- Homeless people
- Those living in areas of greatest deprivation
- Adults with mental health issues
- People with poorer intellectual functioning and learning disabilities
- Those who have been through the criminal justice process
- Immigrants

In addition to the Leeds Beckett study, Leeds has started to monitor gambling behaviour in young people. The Leeds My Health, My School survey asks about young people’s experience within the last 12 months on a range of topics from drugs and alcohol to social and emotional health and wellbeing. The 2019 survey included questions specifically about gambling behaviour. . These questions were answered by 6,940 secondary school pupils across Leeds, in years 7, 9 & 11 (aged 11 to 15) and by 632 post 16 students in years 12 and 13. In summary the results reveal:

- 24% of secondary aged pupils in Leeds had taken part in gambling activity in the last 12 months. In comparison to other addiction subjects, 13% of secondary pupils had smoked a cigarette, 7% had tried illegal drugs and 51% had tried alcohol.
- Of the secondary aged pupils that had gambled; 65% did so with their parent/carer's knowledge. 20% had gambled without their parent/carer's knowledge
- The most common form of gambling amongst secondary aged pupils was via gaming or skin betting, with 21% of pupils taking part in this activity on a regular basis. Bingo was the second most popular form of gambling with almost 20% of pupils taking part throughout the last 12 months. Betting on sporting events was the third most popular form of gambling amongst pupils, with 19% taking part.
- 32% post 16 pupils surveyed had taken part in gambling activity in the last 12 months. In comparison to other addiction subjects, 43% had smoked a cigarette, 24% had tried illegal drugs 80% had tried alcohol.
- Of the post 16 students that had gambled in the last 12 months, almost 70% did so with their parent/carer being aware; 20% did so without their parent/carer being aware.
- The most common form of gambling for the post 16 year groups is national lottery scratch cards. Almost 24% of post 16 year groups have gambled through purchasing scratch cards. This could be attributed to this year group being legally able to purchase scratch cards and lottery tickets. Placing a private bet with friends was the second most popular form of gambling amongst this age group with 18% taking part and betting on sporting events was the third most popular form of gambling with 17% taking part.

Data and analysis of the area around the venue

Low income, deprivation and constrained economic circumstances due to low paid jobs or unemployment are all risk factors to groups vulnerable to gambling related harm. Burmantofts and Richmond Hill contains 15 neighbourhoods that rank within the 10% most deprived neighbourhoods in England on the Index of Multiple Deprivation (2019). Merkur slots would be located in a neighbourhood that is ranked in the 3% most deprived neighbourhoods in England and is the 17th most deprived neighbourhood in Leeds. There are 482 neighbourhoods in Leeds, 114 of which are ranked within the 10% most deprived in England.

With a ward population of 26,255 people, 27% are aged under 16 and 40% of the children in the ward are eligible for Free School Meals. This neighbourhood has a child poverty rate of 57.6%, above the overall Leeds Child Poverty rate of 23%. 65% of the children in poverty in this neighbourhood are from households where at least one adult is in work.

Claimant count is a measure of the number of people claiming unemployment related benefits. It includes both people claiming Job Seekers Allowance and people claiming Universal Credit who are required to seek work. The Leeds Claimant Rate in May 2020 was 6.8%, however the neighbourhood around the proposed venue had a claimant rate of 14.3%

Crime and anti-social behaviour are high within the surrounding neighbourhood when compared to the city average. The police recorded crime rate in the neighbourhood around the venue is 166 crimes committed per 1000 of the population. This is higher than the city wide average of 123 crimes per 1000 of the population. The rates of Anti-Social Behaviour are also above the city average of 20 incidents, in this neighbourhood there were 32 recorded incidents per 1000 of the population.

Black and Asian Ethnic minority groups have been cited in the Leeds Beckett study as being more vulnerable to gambling related harm. The proposed venue would be located within an ethnically

diverse area, with 39% being non-white British, above the city rate of 18.9%. A large proportion of the non-white community are Black British African and Asian British Pakistani. The Leeds Beckett research also highlighted that immigrants are an at risk group to gambling and the area around the proposed premises is also quite transient with new communities developing with a high proportion of National Insurance registrations from Romanian and Polish immigrants.

Adults with mental health issues were cited as an 'at risk' group, vulnerable to problem gambling and the evidence reveals this ward has above average records of adults recording mental health with their GPs. The GP recorded Common Mental Health Rate is 23,237 for the ward - above the Leeds rate of 22,361 and the Severe Mental Health Rate is 1,446 – again, higher than the Leeds rate of 1,321.

Provision of support in the city.

On the strength of the research and the proactive partnership approach adopted by Leeds City Council and partners to addressing gambling related harm, in November 2018 Gambleaware announced funding for the establishment of a Leeds based Northern NHS service led by Leeds and York Partnership Foundation Trust, and a Leeds Community Gambling Service led by Gamcare. The services began delivery in Leeds in September 2019, with up to £1.2 million being invested on an annual basis.

The **Northern Gambling Service** serves the whole of the north of England and has satellite bases in Manchester and Newcastle. The service mainly treats people with the most serious and complex needs in terms of problem gambling.

The service is clinically led by a Consultant Psychologist, with a team consisting of mental health nurses, a psychologist, a psychiatrist, and a carer's support worker. There is also a research element within the service to evaluate the interventions and potentially develop future treatment models.

The **Leeds Community Gambling Service** is delivered by Gamcare and works across the Leeds area to identify, screen and treat problem gamblers and affected others. The community service is led by a service manager and includes prevention and training workers including the role of Criminal Justice Coordinator. The service offers;

- Training to identify the issue and offer brief interventions
- Engagement and promotion
- One to one appointments
- Referrals to the Northern Gambling Service

Should the licence be approved, the council expects Merkur Slots to engage with support services in the city, this must include staff training on gambling-related harms. The council expects the operator to be able to mitigate any harm to vulnerable customers and those at risk of gambling-related harms by prominent and permanent promotion of, as well as referrals into, support services. These would include but are not limited to Leeds Community Gambling Service, Northern Gambling Service, and debt/money advice agencies in Leeds.