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Dear Licensing Authority,

Submission of proposed conditions for the following proposal: BoyleSports (UK) Limited, Grant Application for a Premises Licence, Betting Shop

After reviewing the proposal to grant BoylesSports (UK) Limited a Premises Licence at 86a Queen Street Morley, I would like to submit a representation to this application, providing additional evidence and conditions for this premise licence on the grounds of the following licensing objective; 'protecting children and other vulnerable persons from being harmed or exploited by gambling'.

Leeds City Council has worked in partnership since 2018 to address the harm caused by gambling in the city. The Council commissioned Leeds Beckett University to deliver a piece of research to establish the level of what was then termed 'problem gambling' in the city. The research evidenced that Leeds was likely to have twice the national average rate of problem gambling¹. The Council continues to work with a wide range of partner organisations to address gambling related harm in the city, including with our specialist gambling treatment providers, the NHS Northern Gambling Service and GamCare Yorkshire and Humber.

It should be recognised that the Gambling Act is extremely outdated and is currently under review. In spite of this, this application does not provide measures to meet the key licensing objective outlined above. This is evidenced by the close proximity of a number of key provisions for both children and vulnerable people and inadequate consideration of the appropriate conditions to mitigate these risks by the applicant. Whilst we recognise the licensing authority's extremely limited ability to refuse an application due to the Gambling Act's permissive nature, I would ask the committee to consider whether additional conditions can be applied to go at least some way to mitigate the harm that will be caused by this establishment.

Although children are not legally permitted to gamble, advertising and visibility of gambling companies and products in places where children and young people are present can normalise gambling and make it appear appealing. A recent study conducted on behalf of GambleAware looked into the exposure to and impact of advertising of gambling products on children and young people². The study found that, despite regulations prohibiting targeting of gambling advertising to under 18s:

“Participants reported what they perceived to be high levels of exposure to gambling advertising and marketing and spoke of the ubiquitous nature of gambling advertising across multiple formats. The most common channels of exposure were identified as TV, social media and the high street – including inside and outside shops, billboards and presence of gambling venues... Seeing betting shops or casino arcades was spontaneously mentioned across the research, with participants arguing that they were more prevalent in less affluent areas. The presence of the shop brand and logo was seen to build brand recognition, and participants noted the window advertising used to prominently display promotions and odds of upcoming events.”

The reviewers found that “exposure to the sheer volume of gambling advertising and marketing led to some normalisation of gambling and, on occasion, legitimisation among participants.”

Nearby provisions include:

- Queenswood School, which is a mere 2 minutes away on foot
- Local churches with provisions for children and young people
- A cooking school for children
- A Youth Centre
- A Children’s Centre

It should be noted that Queenswood School, an independent school located nearest to the proposed premises, has been missed from the applicant’s Local Area Risk Assessment.

In addition to this, the local Community Hub, Library and Housing Office are also 2 minutes away on foot. These facilities offer support to residents facing unemployment, financial or budgeting concerns, claiming benefits, accessing free computers and resources and much more. These provisions are accessed by vulnerable residents throughout the day.

In addition to these key local provisions to groups that are at a high risk of gambling related harm whether directly or through the gambling of someone close to them, there are already a number of betting shops or gambling premises in the immediate vicinity of the proposed premises. These are:

- Betfred – 2 doors away
- William Hill – metres away
- Ladbrokes – metres away
- Morley Sports Lounge – metres away

The above businesses are only those located within the immediate locale, and this does not include additional gaming opportunities within the surrounding pubs, social clubs and similar premises with a licence for a maximum of two gaming machines, as well as newsagent-type off licences who retail opportunities to buy and gamble on lottery tickets and scratch-cards.

In relation to these types of applications, planning and licensing authorities need to consider whether any special considerations need to be balanced against the use of the premises for gambling. This should include, for example, the spatial distribution of similar land uses in the local area and the impact on vulnerable people.¹ In this example, there is both a high intensity of gambling premises and high numbers of vulnerable people.

Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.

Introducing an additional betting shop to a busy high street that already has a high level of gambling provision, risks increasing the level of gambling harm in an area further, as well as further normalising gambling as an everyday habit, despite its health harming risks. Whilst we recognise that demand cannot be taken into consideration under the Gambling Act 2005, we ask that consideration is given to the addictive nature of gambling and the direct impact on people who are vulnerable by introducing an additional gambling premise to a high street. The key concern that should be taken into consideration is the visibility of such an establishment adding to a cluster of betting shops within close proximity and the impact that this will have on children, young people and vulnerable adults accessing nearby schools, youth centres, children's centres, provisions and key support services.

Further to this, the following statistics highlight why the introduction of another gambling premises poses particular risk to children, young people and other vulnerable persons in Morley South ward:

- 7.7% of Morley South live in the 10% most deprived neighbourhoods.
- A further 30.8% of the LSOAs in Morley South fall within deciles 2 and 3 of the Index of Multiple Deprivation.
- 1 in 5 children (20%) in the ward are in poverty after housing costs are deducted from income. This equates to around 4,255 children under 20. (Latest figure is from 2021/22 data).
- 2% of Citizen's Advice clients were from Morley South from Q1 of their 2023/24 client data.

In addition to the points outlined, it is important for any new premises on a local high street to contribute to the local business district and work with local businesses and partner organisations to continually improve the area.

Based on the information and evidence provided, the Licensing Committee is asked to add the following conditions to the premises licence, if opting to permit the licence:

- CCTV will be installed to the guidance of the West Yorkshire Police. CCTV will cover all areas of the premises accessible to the public (excluding toilets), including all entrances and exits to the premises. CCTV footage will be retained for a period of 31 days, and made available to any authorised officer of the police or licensing authority.
- A self-exclusion scheme will be in operation in the premises, and for any customers who have self-excluded from Boyle Sports' existing shops in the wider area, such self-exclusion shall also carry over and apply to this shop.
- The licensee shall participate in a local Betwatch or similar scheme, where available.
- Gamcare and NHS Northern Gambling Service promotional materials will be displayed in the premises and staff will be sufficiently trained to assist those customers who require assistance and further support with their gambling.
- The premises licence holder and staff will work with specialistic gambling treatment services and debt advice agencies in Leeds to receive specific training on gambling harm and identification of vulnerable people.
- The premises licence holder and staff will maintain links with specialist gambling treatment services and debt advice agencies and provide information to customers and referrals, as appropriate.
- The operating hours should be in line with other gambling premises on Queen Street, Morley, and should not fall outside of these hours.
- The licence holder will adhere to the Safe Bet Alliance Voluntary Code of Safety and Security.
- The licence holder will regularly audit their Local Area Risk Assessment, social compliance policies and procedures by shop staff and area management and maintain a record of all audits undertaken.
- There will be induction and refresher training for all staff on social compliance and the Local Area Risk Assessment. Records of all such training will be maintained.
- The premises licence holder and staff will support local schemes and initiatives in Morley by working with local businesses through any relevant local forums.

The above conditions have been agreed to by other gambling premises in Leeds. This would ensure that this premise operates in line with others.

In summary, it is recognised that licensing authorities have extremely limited power to refuse a gambling premises licence application and must 'aim to permit', within the current legislation. The Licensing Committee is asked to consider applying the above conditions to the licence to mitigate some of the harm that will be caused by the opening of an additional betting shop on Queen Street and to ensure that the business works with local partners for the betterment of the local high street and the great work of the local business forum. These additional conditions will go some way to reduce the harm to children, young people and vulnerable adults, but will sadly not eradicate that harm.

It is hoped that through the review of the Gambling Act, licensing authorities will be granted powers to protect vulnerable people from gambling related harm in the future.

Yours Sincerely

Grace Lawrenson