

Consultation responses

Response reference	Comment	Current wording	Suggested change
01	Response from Gamcare		
	Response not specific to our policy, general points raised. In the main general points refer to hostels, city areas. Assessments are required by Policy.		No changes.
02	Response from Gambleaware		
	Response not specific to our policy, general points raised. In the main general points refer to hostels, city areas. Assessments are required by Policy.		No changes.
03	Response from Red Rose Leisure (gaming machine provider)		
	Request to include a public register to be publicly available to reflect permits as well as premises licences (which we currently provide).		Request made for ICT to add this to the website. Now added to website. Respondent informed.
04	Response from Paddypower		
	No Paddypower businesses in our area, therefore no comment to give.		No changes.

05 Response from The Association of British Bookmakers (ABB)		
Policy reference and ABB comments	Current wording in draft policy	Suggested change
<p>4.0 Page 12</p> <p>The heading to section 4 of the draft statement of principles is “Promoting the Licensing Objectives.” The reference to “promoting” should be removed as neither the Licensing Authority nor an applicant is required to promote the licensing objectives within the context of a Gambling Act 2005 premises licence. The only body upon whom the Gambling Act 2005 confers a duty to promote the licensing objectives is the Gambling Commission.</p>	<p><i>4.0 Promoting the Licensing Objectives</i></p>	<p>Agreed. Change heading to The Licensing Objectives</p>
<p>5.7 Page 19</p> <p>This section would be assisted by a further reference to the fact that individual conditions will only be imposed where there is clear evidence of a risk to the licensing objectives that requires that the mandatory and default conditions be supplemented in the circumstances in a particular case.</p>	<p><i>Where there are specific risks or problems associated with a particular locality, or specific premises, or class of premises, the Licensing Authority will attach individual conditions to address this.</i></p>	<p>No change</p>
<p>5.5 Page 16</p> <p>Thereafter, there is a list of bullet points that need to be re-drafted. The reason that this needs to be re-drafted is that the list of bullet points contains matters that are not relevant to any assessment of risk to the licensing objectives. For example, whether the premises</p>	<p><i>The Licensing Authority will expect the local risk assessment to consider the setting including:</i></p> <ul style="list-style-type: none"> • <i>The proximity of the premises to schools.</i> • <i>The commercial environment.</i> • <i>Factors affecting the footfall.</i> • <i>Whether the premises is in an area of deprivation.</i> • <i>Whether the premises is in an area subject to</i> 	<p>Amend bullet points to</p> <ul style="list-style-type: none"> • Whether the premises are in an area subject to high levels of crime and or disorder; • The location of services for children such as schools, playgrounds, toy shops, leisure centres;

<p>is in an area of deprivation, the ethnic profile of residents in the area and the range of other facilities in the area cannot be relevant to any assessment of risk to the licensing objectives. The only way ethnicity/deprivation could be relevant is if the Licensing Authority had pre-determined that persons in a particular socio economic group or of a particular ethnicity were either automatically vulnerable or more likely to commit crime as a result of gambling. This cannot be the case.</p> <p>Furthermore, the range of other facilities in the area, the proximity of churches etc and known problems of street drinking and anti-social behaviour are not relevant to any assessment of risk to the licensing objectives. Moral objections cannot be entertained and issues of nuisance correctly identified earlier in the draft Statement of Principles as considerations that are not relevant</p>	<p><i>high levels of crime and/or disorder.</i></p> <ul style="list-style-type: none"> • <i>The ethnic profile of residents in the area.</i> • <i>The demographics of the area in relation to vulnerable groups.</i> • <i>The location of services for children such as schools, playgrounds, toy shops, leisure centres and other areas where children will gather.</i> • <i>The range of facilities in the local area such as other gambling outlets, banks, post offices, refreshment and entertainment type facilities.</i> • <i>Known problems in the area such as problems arising from street drinkers, youths participating in anti-social behaviour, drug dealing activity, etc.</i> • <i>The proximity of churches, mosques, temples or any other place of worship.</i> 	<ul style="list-style-type: none"> • Nearby gambling, drug, alcohol or mental health support facility; • Other gambling premises in the vicinity.
<p>5.5 Page 17</p> <p>The second list of bullet points deals with how the local risk assessment should show how vulnerable people are protected. Once again, this list contains matters that are not relevant to an assessment of risk to the vulnerable and should be re-drafted. For example, “gaming trends that may mirror days for financial payments such as pay days or benefit payments” cannot be relevant unless the Licensing Authority has predetermined that those in receipt of benefits are automatically vulnerable. The list of bullet points should be</p>	<ul style="list-style-type: none"> • <i>The training of staff in brief intervention when customers show signs of excessive gambling, the ability of staff to offer brief intervention and how the manning of premises affects this.</i> • <i>Information held by the licensee regarding self-exclusions and incidences of underage gambling.</i> • <i>Arrangements in place for local exchange of anonymised information regarding self-exclusion and gaming trends.</i> • <i>Gaming trends that may mirror days for financial payments such as pay days or benefit payments.</i> 	<p>Amend bullet points to</p> <ul style="list-style-type: none"> • The training of staff to intervene when customers show signs of excessive gambling, the ability of staff to offer intervention and how the staffing of premises affects this. • Arrangements for dealing with monitoring under age and vulnerable persons. These may include - dedicated and

<p>redrafted so that it refers only to relevant considerations</p>	<ul style="list-style-type: none"> • <i>Arrangements for monitoring and dealing with under age people and vulnerable people, which may include:</i> • <i>dedicated and trained personnel,</i> • <i>leaflets and posters,</i> • <i>self-exclusion schemes,</i> • <i>Window displays and advertisements designed to not entice children and vulnerable people. The provision of signage and documents relating to game rules, gambling care providers and other relevant information be provided in both English and the other prominent first language for that locality.</i> • <i>An assessment of the proximity of premises that may be frequented by vulnerable people such as hospitals, residential care homes, medical facilities, doctors' surgeries, council community hubs, addiction clinics or help centres and places where alcohol or drug dependent people may congregate.</i> 	<p>trained personnel, leaflets, posters, self-exclusion schemes, window displays, and advertisements not to entice passers-by.</p>
<p>06</p>	<p>Response from Milford on Sea Parish Council</p>	
<p>Discussed at Parish Council meeting but no specific comment to make on the policy.</p>		<p>No changes.</p>
<p>07</p>	<p>Response from Hythe and Dibden Parish Council</p>	
<p>Discussed at Parish Council meeting-Parish Council supports the Policy the Policy</p>		<p>No changes.</p>

08	Response from Hampshire County Council-Public Health	
Public Health comments	NFDC comments	Suggested change
<p>Comment 5 Comparison with other Hampshire Authorities</p>	<p>The rural location of the New Forest area determines the number of residents, therefore it is difficult to make comparisons with the more densely populated areas of Hampshire. In addition each application must be determined on its own merits. Premises must also be granted planning permission by the appropriate planning authority first.</p>	<p>Noted. No change recommended</p>
<p>Comment 6 Recommend that the relationship between areas of deprivation and licensed premises are highlighted.</p>	<p>The areas shown on HCC document mirror the more densely populated areas of the New Forest. Therefore given the rural nature of the New Forest, these areas will be the preferred area for such businesses. The number of licensed premises is comparatively low (2 AGCs and 12 betting shops). 3 Totton, 2 Ringwood, 2 New Milton, 1 each in Holbury, Hythe, Lymington, Fordingbridge and Blackfield. There are no homelessness hostels in the New Forest district.</p>	<p>Noted. No change recommended</p>
<p>Comment 7 Problem gambling</p>	<p>This references problem gambling which includes on-line gambling which is outside the remit of this policy.</p>	<p>Noted. No changes recommended</p>
<p>Comments 8, 9 and 10 5.5 Risk assessments</p>	<p>Welcomed suggestions which operators should cover in their risk assessments.</p>	<p>Amended as above and requirements for risk assessments included</p>