

BIRMINGHAM CITY COUNCIL

PUBLIC REPORT

Report to:	Licensing Sub Committee A
Report of:	Director of Regulation & Enforcement
Date of Meeting:	Monday 13th January 2025
Subject:	Gambling Act 2005 Premises Licence - Grant
Premises	Shipley's, 90 – 92 Erdington High Street, Erdington, Birmingham, B23 6RS
Ward affected:	Erdington
Contact Officer	David Kennedy, Principal Licensing Officer, licensing@birmingham.gov.uk

1. Purpose of report:

To consider the relevant representations that have made in respect of an application for a Bingo Premises.

2. Recommendation:

To consider the representations that have been made and to determine the application.

3. Brief Summary of Report:

Premises Licence application received on 8th November 2024 in respect of Shipley's, 90 – 92 Erdington High Street, Erdington, Birmingham, B23 6RS.

Representations have been received from Interested Parties.

4. Compliance Issues:

4.1 Consistency with relevant Council Policies, Plans or Strategies:

The report complies with the City Council's Statement of Licensing Principles and the Council's Corporate Plan to improve the standard of all licensed persons, premises and vehicles in the City.

5. Relevant background/chronology of key events:

Shipley Estates Limited submitted an application for a Bingo Premises Licence on 8th November 2024 for Shipley's, 90 – 92 Erdington High Street, Erdington, Birmingham, B23 6RS.

Representations have been received from Interested Parties, which are attached at Appendices 1 – 14.

The application, including the Local Risk Assessment, is attached as Appendix 15.

Site Location Plan Appendix 16.

When carrying out its licensing function, a licensing authority shall aim to permit the use of premises for gambling in so far as the authority think it is in accordance with any relevant codes of practice issued by the Gambling Commission, in accordance with guidance to licensing authorities issued by the Commission, in accordance with the authorities' statement of licensing principles and is reasonably consistent with the licensing objectives, which are: -

- a. Preventing gambling from being a source of crime or disorder, being associated with crime or 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.

6. List of background documents:

Representations as detailed in Appendices 1 – 14
Application Form and Local Risk Assessment, Appendix 15
Site Location Plan, Appendix 16

7. Options available

To Grant the application
To Refuse the application
Grant the application with conditions

From: Councillor Robert Alden
Sent: 05 December 2024 13:42
To: Licensing
Cc: Councillor Gareth Moore
Subject: Licensing Objection - 90-92 High Street former Costa Coffee

Dear Licensing,

We have been made aware of a Gambling Application to move the existing Adult Gaming Centre at 243 High Street into the unit at 90-92 High Street. This unit is the former Costa Coffee unit.

The application is to transfer the license from the 243 premises and also to expand the use to also have a Bingo Premise Licence as well.

We are very concerned about this application and its impact locally and so oppose the application to convert the former Costa unit into a gambling unit, by relocating a store from further down the High St.

While this is not an increase in the number of units, across the whole High Street, this is replacing a smaller shop with a larger one and so will likely increase the amount of betting machines operating and importantly will also lead to a concentration of gambling shop units in the same location. There is already a betting shop next door and another 4 doors up, very close to this location and therefore the clustering of gambling units close to each other in the pedestrian part of the High Street could increase ASB and crime.

The Gambling Act 2005 has three clear objectives:

- keeping gambling crime free
- making sure that gambling is fair and open
- protecting children and vulnerable adults

Looking at this application and the recent history of Erdington with the Anti-Social behaviour and crime that has taken place nearby a range of gambling establishments the clustering of 3 nearby each other on the pedestrian area of the High Street nearby a range of family aimed shops and the markets will lead to significant risk of gambling associated crime in the location, and will lead to placing many more children nearby the establishment in its new location than go past its current location.

The pedestrian area is home to Erdington Library a mere 5 or 6 units away, which has a dedicated children's library and hosts a range of family activities. It is also the part of the High Street often older children hang around in to socialise after school. These would be exposed to this new unit if given permission, given the double frontage of the place it would be very difficult not to notice it.

This end of the High Street is also leads directly onto terraced roads which house large numbers of families who would regularly be exposed to the new unit if given permission.

The wider Erdington area is we understand home to a number of exempt accommodation units housing recovering gambling addicts and placing one such establishment in such a large and prominent location will increase the risk that those residents could slip back into addiction.

Shops report there is significant levels of shop lifting locally and the application does not give any details about how the applicant would prevent the proceeds of the sale of those goods then being gambled on the premises.

Due to the above and this increase in size of the unit, clustering impact on this part of the High Street and the loss of one of the larger retail units left in Erdington High Street, we urge the Council to reject the application.

Yours sincerely

Cllrs Robert Alden (resident nearby on Orchard Road) and Gareth Moore Erdington's Ward Councillors

Cllr Robert Alden

Erdington Ward

From:
Sent: 26 November 2024 15:37
To: Licensing
Subject: Gambling application 90-92 Erdington High Street

94, Orchard Road Erdington B24 9JD

Dear Sir or Madam,

I strongly object to the application for a gambling arcade at 90/92 Erdington High Street. There is already a betting shop next door and another one only four doors up. I feel that a cluster of gambling units so close to one another on a pedestrian part of the High Street could certainly increase ASB and crime, indeed BBC Midlands Today did an article on Erdington High Street last evening where the shoplifting and drug taking was discussed.

I am also concerned that this premises is also very close to Erdington Library, which is well used by young people and adults alike and any more ASB in the area would not be fair on children and the vulnerable particularly. This as you obviously know is one of the objectives in the Gambling Act.

The Gambling Act itself has clear objectives and one of these is keeping gambling crime free, I do not think that this would be the case in this part of Erdington, which at the moment is fairly pleasant to be in, unlike the other end of the High Street.

Yours sincerely,

From:

Sent: 26 November 2024 20:28

To: Licensing

Subject: Appeal against Shirley's opening a larger gambling site on Erdington High Street

I am writing to strongly oppose the request by Shipley's to open a larger gambling property in whst was previously Costa Coffee.

As a home owner on Edwards Road I find it more and more terrifying to enter the high street and this would be bringing the trouble even closer.

Shipleys are guaranteed massive profits but at the expense of families that want to live safely in their own community. I'm sure the owners would not be happy to live in Erdington.

This has to stop.

From:

Sent: 27 November 2024 08:57

To: Licensing

Subject: Gambling Application: 90-92 High Street, Erdington

I am writing to formally object to the gambling application for converting the former coffee shop located at 90-92 Erdington High Street into a gambling arcade.

The High Street already has a significant number of gambling and betting establishments, which has contributed to noticeable anti-social behaviour issues in the area. The introduction of another gambling arcade would exacerbate these problems, further deteriorating the quality of life for local residents and negatively impacting the community.

Key points of concern include:

1. ****Increase in Anti-Social Behaviour****: The presence of multiple gambling establishments has already led to a rise in anti-social activities, including loitering and public disturbances. Adding another such venue would likely intensify these issues.
2. ****Community Well-being****: The High Street should offer a diverse range of businesses that cater to the needs and well-being of all residents. A gambling arcade does not align with the community's needs and could potentially harm vulnerable individuals.
3. ****Economic Impact****: The current economic climate requires supporting businesses that bring positive contributions to the community. Converting a coffee shop, which serves as a social hub, into a gambling arcade could result in decreased foot traffic and a negative impact on other local businesses.
4. ****Public Opinion****: There is a significant concern among residents regarding the proliferation of gambling venues. This sentiment should be considered in the planning process, prioritising the wishes and welfare of the local community. For the reasons outlined above, I urge the council to reject this planning application and consider the long-term impact on the community's safety and well-being.

If you need anything else from me, or further details please let me know.

Thank you.

Concerned resident of Erdington

From:

Sent: 27 November 2024 10:44

To: Licensing

Subject: Gambling application: 243 High Street, Erdington to 90-92 High Street Erdington

We are concerned and object to the application for this gambling application, currently at 243 High Street, Erdington to 90-92 High Street, Erdington (formerly Costa Coffee).

We need more retail businesses not gambling shops. The Co-op is to close soon which will be another blow to the shopping area. We do not want establishments that bring increases in crime and Anti-Social behaviour.

Orchard Road, Erdington, Birmingham, B24

From:
Sent: 27 November 2024 15:01
To: Licensing
Subject: 90-92 high street

To whom it concerns

I wish to add comment on the application for a gambling arcade to move to 90-92 high street , Erdington.

I am resident of the area.

There are already too many gambling and betting shops in that part of the high street. I frequently witness antisocial behaviour on that part of the High Street already and adding a gambling arcade will just add risk to that increasing.

It is not appropriate and puts vulnerable adults at risk by increasing the options and temptations available in one area. There is already a betting shop right next door.

Erdington high street is loosing shops and cafes and we need more premises like these to increase footfall in the area and make it a more welcoming place, moving a gambling arcade is not the answer.

Many thanks for consideration of my comments.

Edwards Road Resident

From:

Sent: 30 November 2024 20:09

To: Licensing

Subject: Shipleys Bingo License application for 90-92 High Street, Erdington

To whom it may concern,

My family and I live in the neighborhood, a short walk away from 90-92 High Street, and we are against having another gambling provider particularly as it's so close to several others.

Having another gambling provider makes the High Street less family friendly, encourages crime and antisocial behaviour.

There are already many issues with antisocial behaviour near to where these gambling providers are located. My children and I do not feel safe walking past these gambling shops as do many other families that I know who live in the area.

Gambling is not a positive thing and our high streets should be at the heart of everything that we do to create positive changes for our children and our community. Our local schools work hard to safeguard children and young people and having gambling establishments in a family area just exacerbates the situation.

Gambling should not be encouraged, and I do hope the application is refused.

Yours faithfully

From:
Sent: 02 December 2024 23:00
To: Licensing
Subject: Objection to Licence Application (Shipley's Erdington)

Dear Sir or Madam,

I am writing to raise my objection to the granting of a licence of a Bingo Premises License at 90-92 High Street, Erdington which has been filed by Shipley Estates Limited.

Over the last few years, Erdington High Street has sadly developed a reputation for drug dealing and anti-social behaviour (in part due to the unmanaged proliferation of HMO's in the area). I fear that the placement of a large gambling premises as proposed will undermine the work of local councillors, residents associations and the police to make Erdington High Street (and the surrounding area) a safer, more welcoming and crime free environment.

There is already a betting shop next door to the site linked to this application and another just a few doors up from the proposed site and while it is appreciated that the existing Shipleys site would close if the application was approved, this would nonetheless lead to a clustering of gambling premises in very close proximity to each other and potentially fuel an increase the level of anti-social behaviour and crime.

There is also a distinct possibility that granting licence for this premises could result in existing ASB issues which are currently occurring toward the opposite end of the High Street (by Six Ways Island and near where the current Shipley's is located) simply moving up the road to what is the more family friendly pedestrianised end of the High Street (there is currently a board and card game shop, a video game retailer, a school uniform retailer, Wilton Market, a cafe and other retail units that regularly attract parents and children while out shopping).

Home Office data has highlighted Erdington as being one of the worst areas in the city for antisocial behaviour and this application will NOT do anything to alleviate this or help contribute positively to the profile of the area and make Erdington High Street a more family friendly and inviting place to visit. As such I ask that you refuse to grant the licence that has been applied for.

Kind regards

From:
Sent: 04 December 2024 14:28
To: Licensing
Subject: Gambling arcade application

RE. GAMBLING APPLICATION FOR GAMBLING ARCADE
To move to 90-92 High Street, Erdington (former Costa unit)

I am very concerned about this application, and urge you to reject it.

I believe that the proposed location is wholly inappropriate. It will create a cluster of betting and gambling establishments within a short distance of each other. This is very worrying and has the potential to change the character of this section of the high street, to its detriment. Currently, the proposed unit is by a pleasant, pedestrianised area of the high street, near to local cafes. The area is well used as a meeting place, and for social, family friendly gatherings (such as the Christmas lights switch on).

I am very worried that a large gambling arcade here will be attractive to young people, encouraging them to partake in gambling. It could also become an after-school meeting point, leading to potential issues. It could be a magnet for anti-social behaviour, making young people and local residents very vulnerable.

An increase in access to gambling can also create social issues. Gambling can be highly addictive, and can lead to issues around debt as well as having a negative impact on mental health. Many businesses, community groups and local residents in Erdington are keen to promote social cohesion, and increase opportunities to engage in positive activities. The creation of more, and larger, gambling establishments does the opposite of this. Places such as this only serve to perpetuate a negative image of Erdington, and exacerbate some of the issues we currently encounter on the high street, such as shoplifting, drug dealing and alcohol consumption.

I object to this application in the strongest terms, and again urge you to not allow it to go ahead.

Thank you.

York Road
Erdington
Birmingham B23

From:
Sent: 04 December 2024 19:54
To: Licensing
Subject: Re: 90-92 High Street, Erdington

Dear Sir/Madam,

I am writing to object to the application to move the Adult Gaming Centre from 243 to 90-92 High Street Erdington.

The re-purposing of the former Costa unit will further reduce the retail stock within the High Street. This is an increasing concern with several businesses (e.g. Boots, Walter Smith and the Co-op) closing their Erdington shops in the last two years.

It will also significantly expand Shipley's presence on the High Street. They currently have two single fronted premises, Nos. 90-92 being the smaller of the two. The former Costa unit is double fronted and will therefore increase the number of terminals etc which they can install and thus their footfall. At the same time, their parallel request for a Bingo Premises Licence seems to be a means to allow under 18s onto these premises as long as they only use gaming (i.e. slot) machines. The Gambling Act 2005 has the objective to protect children and vulnerable adults. This seems directly to conflict with Shipley's request. Moreover there are already many vulnerable adults in the Erdington area. Money is very tight. Begging is commonplace on the High Street. How can this expansion improve the situation? There are eight gaming or gambling outlets on the High Street all told. Indeed, there are two bookmakers (Boyle Sports and William Hill) very close to 90-92, the latter being next door. This new cluster of outlets will clearly draw more people down to the pedestrianised end of the street.

Erdington High Street already has a very bad reputation (as reported throughout November by both local and national press) for anti-social behaviour and criminality. This application will only add to this if approved. The 2005 Act also has the objective to keep gambling crime free. Shipley's application will likely have the opposite effect. It must be rejected.

Yours faithfully,

P.S. My address is Orchard Road Erdington B24 . This is within easy walking distance of the end of the High Street directly affected by this application.

From:
Sent: 05 December 2024 17:09
To: Licensing
Subject: 90-92 High St Erdington

We have just become aware of the application to transfer the gambling licence from 243 High St to the above.

We wish to object to this as this part of the High St is becoming a gambling centre with two bookmakers in the immediate vicinity and a total of 7 such operations on the High St. If any change is needed it is surely to reduce the number of such licences.

This would replace a cafe with yet another gambling establishment, ruining what remains of the community retail facilities. Such businesses are accompanied by anti social behaviour.

Does nobody care what is happening to Erdington High St which is becoming lost to betting and gaming operations and all the social degeneration that accompanies it?

Orphanage Rd
Erdington

From:
Sent: 05 December 2024 17:38
To: Licensing
Subject: Objection to Shipley's Gaming Erdington

Hello,

I wanted to raise my objection to Shipley's Gaming relocation.

The area is already filled with addicts and the most vulnerable.

I have sat with very fragile people in Erdington who have been betting in Erdington and had to escape for safety and their lives have been turned upside down.

Young, vulnerable women and young men need support not further chances to ruin their lives.

Kind Regards

From:
Sent: 05 December 2024 18:52
To: Licensing
Subject: Shipley Gaming.

Dear Sir/Madam

I am writing to protest in strongest terms the proposal from Shipley Gaming to relocate to the old Costa Coffee on Erdington High Street.

This application will see the increase of anti social behaviour which already blights the area. It will also see the introduction of more unlimited gaming machines due to bigger property. Erdington is an area of high unemployment and poverty and this would encourage more money lost by people who can ill afford to loose it

Yours

From:

Sent: 05 December 2024 21:55

To: Licensing

Subject: Oppose - gambling move application Erdington High Street

Dear council,

I am very disappointed to hear that a gambling application is in consideration for the former Costa Coffee site at Erdington High Street. I am a local resident and I believe this will increase crime and ASB behaviour in the area.

Recent development near to the proposed application is retirement homes. I am certain the elderly and vulnerable adults therefore in the long run will have increased fear due to increased gambling of the multiple other gambling shops in very close proximity.

With all of this, I am concerned it will impact the local businesses such the Wilton Market and the Acorns Charity shop, which I believe is one of the largest stores in the UK.

I always do my best to support the local businesses on the High Street by shopping there and my concern of gambling sites near each other will increase the crime and would make me think twice in venturing out to the High Street.

I feel very strongly against the move of the gambling site to the application site proposed and hope the council reject the proposal.

Kind regards

Local Erdington Resident.

**Application for a premises licence
under the Gambling Act 2005 (standard form)**

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is—

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

Part 1 – Type of premises licence applied for

Regional Casino ☐ Large Casino ☐ Small Casino ☐
 Bingo ☒ Adult Gaming Centre ☐ Family Entertainment Centre ☐
 Betting (Track) ☐ Betting (Other) ☐

Do you hold a provisional statement in respect of the premises? Yes ☐ No ☒

If the answer is "yes", please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

Part 2 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A

Individual applicant

1. Title: Mr ☐ Mrs ☐ Miss ☐ Ms ☐ Dr ☐ Other (please specify)

2. Surname: Other name(s):

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]

3. Applicant's address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant's operating licence (as set out in the operating licence):

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person. ☐

[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation:

Shipley Estates Limited

7. The applicant's registered or principal address:

**National House
Etchell Road
Tamworth
Staffordshire
B78 3HF**

8(a) The number of the applicant's operating licence (as given in the operating licence):

000796-N-103432

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

N/A

9. Tick the box if the application is being made by more than one organisation. ☐

[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known):

Shipleys

11. Address of the premises (or, if none, give a description of the premises and their location):

**90-92 High Street
Erdington
Birmingham
B23 6RS**

12. Telephone number at premises (if known): **N/A**

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

N/A

14(a) Are the premises situated in more than one licensing authority area?

No

14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, other than the licensing authority to which this application is made:

N/A

Part 4 – Times of operation

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case?

No

15(b). If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon			
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates:

N/A

Part 5 – Miscellaneous

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued):

Upon successful grant of this application, and once the premises are ready to commence trading, the Current Adult Gaming Centre Premises Licence (Licence Number 340/1) held at the existing site will be surrendered.

We will provide written confirmation of this to this licensing authority and until such a time, the existing Adult Gaming Centre Premises Licence held at Shipleys, 243 High Street, Erdington, Birmingham, B23 5SS (Licence Number: 340/1) is to remain in effect.

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence?

No

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application. ☐

19(a). Do you hold any other premises licences that have been issued by this licensing authority?

Yes

19(b). If the answer to question 19(a) is yes, please provide full details:

Adult Gaming Centre Premises Licences

Golden Coin, 242 Hawthorn Road, Kingstanding, Birmingham, B44 8PP
Shipleys, 243 High Street, Erdington, Birmingham, B23 5SS

Bingo Premises Licences

Shipleys, 167 High Street, Erdington, B23 5SS

20. Please set out any other matters which you consider to be relevant to your application:

Shipley Estates Limited have full authority to provide licensed gaming by the provision of an Operating Licence granted by the Gambling Commission. The UK's Gambling Regulator has therefore approved the measures implemented to ensure that effective anti-money laundering procedures are applied and policies have been developed to ensure responsible trading in accordance with the gambling legislation, the licensing objectives and the licence conditions and code of practice.

The applicant has comprehensive measures to ensure that all gambling remains socially responsible, which includes detailed staff training on matters such as the protection of the vulnerable, including homeless individuals and young persons.

The applicant is an experienced licenced operator providing a estate of licenced gambling premises.

The purpose of this application is to facilitate the relocation of the gambling provisions currently offered at the following premises:

Shipleys, 243 High Street, Erdington, Birmingham, B23 5SS

Upon successful grant of this application, and once the premises are ready to commence trading, the Current Adult Gaming Centre Premises Licence (Licence Number 340/1) held at the existing site will be surrendered. At no point will the premises trade simultaneously and there will be no increase in the gambling provisions in Birmingham.

Part 6 – Declarations and Checklist (Please tick)

We confirm that, to the best of our knowledge, the information contained in this application is true. We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.



We confirm that the applicant(s) have the right to occupy the premises.



Checklist:

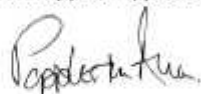
- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- We understand that if the above requirements are not complied with the application may be rejected
- We understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities



Part 7 – Signatures

21. Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:



Print Name: Poppleston Allen

Date: 7 November 2024

Capacity: Solicitors for & on behalf of the applicant

22. For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name:

Date:

Capacity:

[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 21 and 22.]

[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]

Part 8 – Contact Details

23(a) Please give the name of a person who can be contacted about the application:

Elizabeth Varley

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted:

24. Postal address for correspondence associated with this application:

Poppleston Allen
37 Stoney Street
The Lace Market
Nottingham
NG1 1LS

25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

Local Area Risk Assessment Report



Premises

Premises Name:	SHIPLEYS
Premises Address:	90-92 High Street, Erdington, Birmingham, B23 6RS
Premises Licence Number:	T.B.C

Company

Operating Company	Shipley Estates Limited
Directors	William Shipley / Harry Shipley

Risk Assessor

Name of Assessor:	Mark Wilson
Position in company:	Operations Manager
Date of assessment:	2 nd November 2024
Date for next review/assessment:	Annually



Requirement

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

Effective as of 6th April 2016

Social Responsibility code provision 10.1.1

As a socially responsible operator, Shipley Estates has conducted this Local Area Risk Assessment Report in conjunction with legislative requirements that are effective as of 6th April 2016. The purpose of this Risk Assessment is to assess the local risks to the licensing objectives posed by the provision of gambling facilities at the proposed licensed premises named above. Policies, procedures, and control measures to mitigate any risks which may be imposed are considered, taking into account relevant matters identified in the licensing authority's statement of licensing policy.

This Local Area Risk Assessment Report will be reviewed (and updated as necessary) taking into account;

- Any significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
- When there are significant changes at a licensee's premises that may affect their mitigation of local risks;

When applying for a variation of a premises licence; and in any case, undertake a local risk assessment when applying for a new premises licence.

MW/LARA/MAR-24

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Local Area Risk Assessment Report



Local Area Profile

The proposed Bingo Licensed venue is to be located in the High Street of Erdington. There is a medium footfall in this catchment area of Erdington located within a primary zone of the main high street. The premises have good access for those with cars and plenty of parking facilitates the level of traffic (both vehicular and pedestrianised). The nearest transport link for trains is approximately a one mile walk and the public transport links (buses) do not enter this section of Erdington but are on the main adjacent road and there are no night clubs, schools or colleges in the immediate vicinity.

There is a wide range of retail outlets in the close vicinity including licensed betting offices with William Hill (next door to proposed premises) and Boyle Sports at the end of the street. There are many convenience stores, including Superdrug, Co-op supermarket and a small local market (Wilton Market) along with an array of fast-food outlets and cafés.

Medical facilities can be found via Northcroft Hospital located 1 mile by car (4 minutes) or by walking which would take approx. (17 minutes). A pharmacy can be found at 30-32 High Street Erdington which is approx. 4 minutes' walk from the proposed premises.

With regard to monitoring vulnerable people, there are several pawn brokers ('H&T pawn brokers', 'Direct Jewellers' and right opposite the proposed premises is 'Goodbar Jewellers', all of whom buy and sell gold/jewellery and that are trading in the immediate vicinity. Our current compliance and social Awareness training modules take into account players that are spending more regularly, spending excessive amounts and that play higher staked games. Any customers found to be using services offered by either pawn brokers and then found to be gambling would require the need to hold specific meetings with those customers in relation to their gambling to ensure no harm from gambling is present.

There are no schools within the direct local vicinity of the proposed premises nor in the town centre and the operator already has strict policy and procedures in place in other venues they operate to manage, and prevent, under-age gambling.

The premises are more or less of a square shape and occupies 2,000 square feet, with a forty feet prominent frontage, having one main door to gain entry. The entrance area will be designed with an integral vanity screen giving access one to a secondary glass security door upon entry. This will offer both privacy and additional security and act as an obstruction of line of sight to the main high street. No auxiliary activities or facilities are proposed to be offered other than Bingo and gambling machines of Category B3, C and D.

There are some local public houses in the local vicinity with the 'The Swan' on the opposing side of the road. There are no known local problems with crime or anti-social behaviour linked to gambling.

Our regulatory return data does not reflect any specific problems associated with consumer complaints, the need to call police for assistance or attempts by children and young persons to enter the premises

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This Local Area Risk Assessment will take into account three key areas:

Gambling Act 2005 – The Licensing Objectives

- (i) - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- (ii) - Ensuring that gambling is conducted in a fair and open way, and
- (iii) - Protecting children and other vulnerable people from being harmed or exploited by gambling.

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(i) – Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

Risk Event	Risk Category	Level of Risk (L / M/ H)	Local Impact (L / M/ H)	Risk Management	Review Date
Risk gambling provision is a source of crime or disorder (relative to premises type)	Crime and/or disorder occurring undetected within licensed premises	Low	Low to business Low to public frequenting premises	1. Employees receive Social Responsibility training at induction and receive regular refresher training (annually). 2. Training provided with regard to the identification of crime and disorder and appropriate recording processes and reporting lines. 3. Interaction training provided. 4. Social Responsibility and incident report forms available to all staff. 5. LIVE support via Staff Guard security services. 6. HD CCTV monitoring 24/7.	Nov 2024
	Failure to identify attempts to launder money on the premises (e.g., dye-stained notes) and to follow correct reporting procedure.	Low	Low to business Low to public frequenting premises	1. Effective monitoring of customers' behaviour by good lines of sight from static staff. 2. Well positioned HD CCTV cameras. 3. See Anti Money Laundering Risk Assessment (AML RA).	Nov 2024
	Poor security increasing vulnerability to crime.	Low	Low to business Low to public frequenting premises	1. Static Panic Alarms. 2. Intruder alarm installed and regularly serviced. 3. Effective HD CCTV coverage with data storage for 30 days. 4. Time lock banking safe installed. 5. Electronic safes provided for staff. 6. Staff Guard Panic Button Security Services available 24/7. 7. Electronically controlled glass foyer door to assist site security.	Nov 2024
	Awareness of heightened local crime in the local area.	Low	Low to business Low to public frequenting premise	In-line with national urban levels. No heightened risk. https://www.police.uk https://ukcrimestats.com https://www.gov.uk/government/collections/crime-statistics	Nov 2024

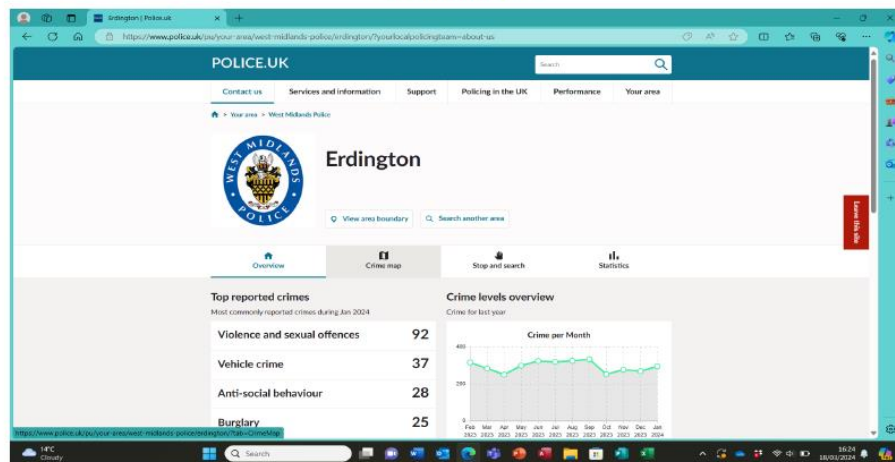
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(i) - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime (Cont.)

LARA Report – Crime Statistics – Erdington

Breakdown of Crime



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(ii) - Ensuring that gambling is conducted in a fair and open way

Risk Event	Risk Category	Level of Risk (L / M / H)	Local Impact (L / M / H)	Risk Management	Review Date
Risk of not complying to legislation in terms of Open and Fair gambling activities and failure to provide full information to players.	Risk that sufficient information is not available ensuring that individuals participating in gambling activities are in a position to make informed decisions	Low	Low on business Low on customer	1. Clear terms and conditions provided within premises. 2. All club rules and policies made available by way of Compliance Manual Flip Chart (Front of House Folder). 3. Internal POS highlighting keeping control of gambling. 4. Machines in-store that offer setting limits on time or money being spent when playing. 5. Promotional offers are clear and precise. All relevant details on game play, percentage return and stake to play are detailed within the premises.	Nov 2024
	Protection of customer funds and implementation of clear policies for dispute resolution	Low	Low on business Low on customer	1. Customer information readily available within licensed premises detailing dispute resolution processes.	Nov 2024
	Failure to deal with customer complaints and disputes in relation to gambling.	Low	Low on business Low on customer	1. Employees receive Social Responsibility training at induction and receive regular refresher training (annually). 2. Staff given knowledge and are trained in the company's four stage complaints and disputes procedure policy. 3. Complaints and disputes policy leaflets readily available for customers. 4. Staff given knowledge and trained in completing Customer Dispute Forms and to send into Head Office. 5. Machine maintenance is carried out by competent persons. 6. Gaming Machines only acquired from licensed suppliers.	Nov 2024

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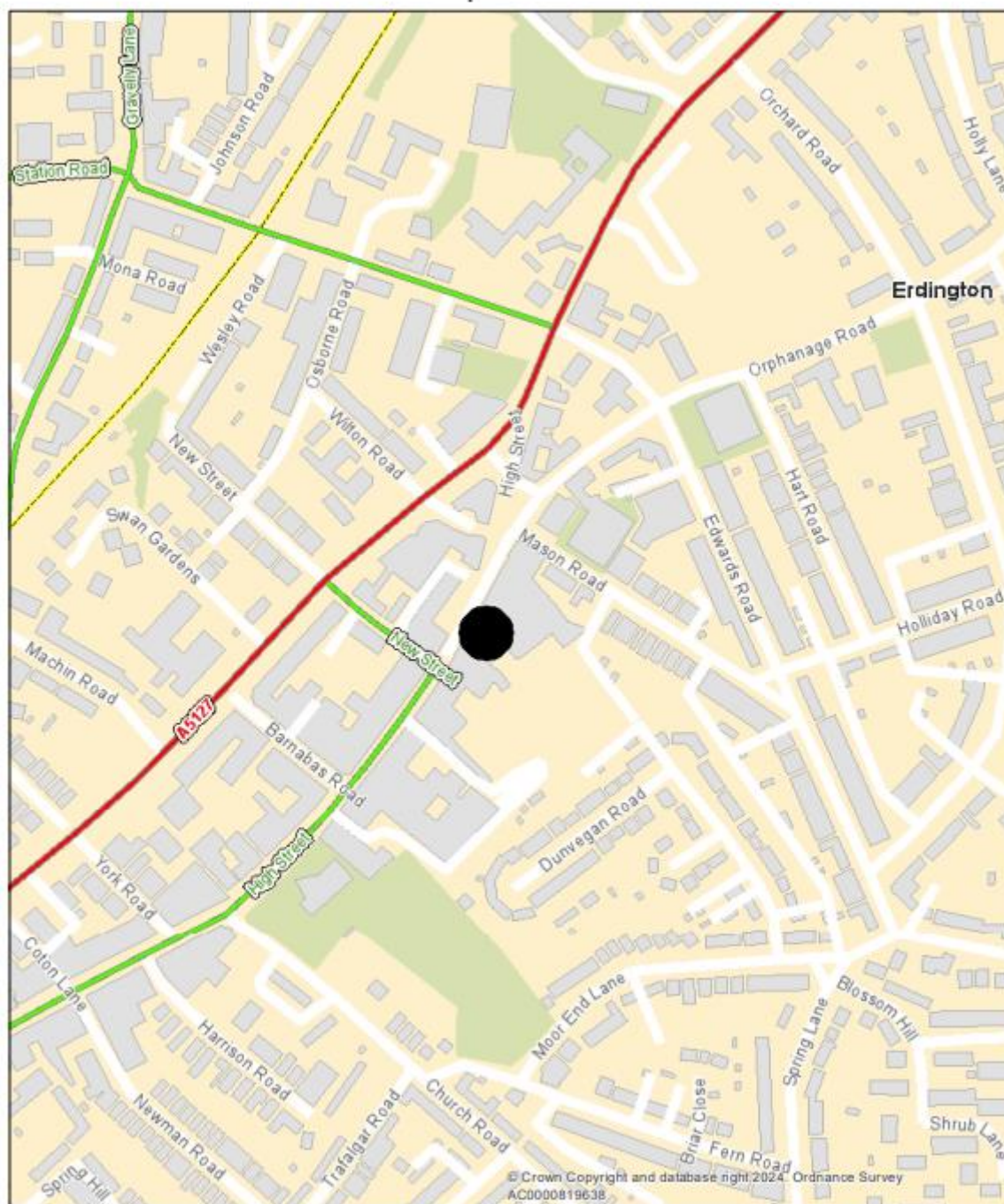
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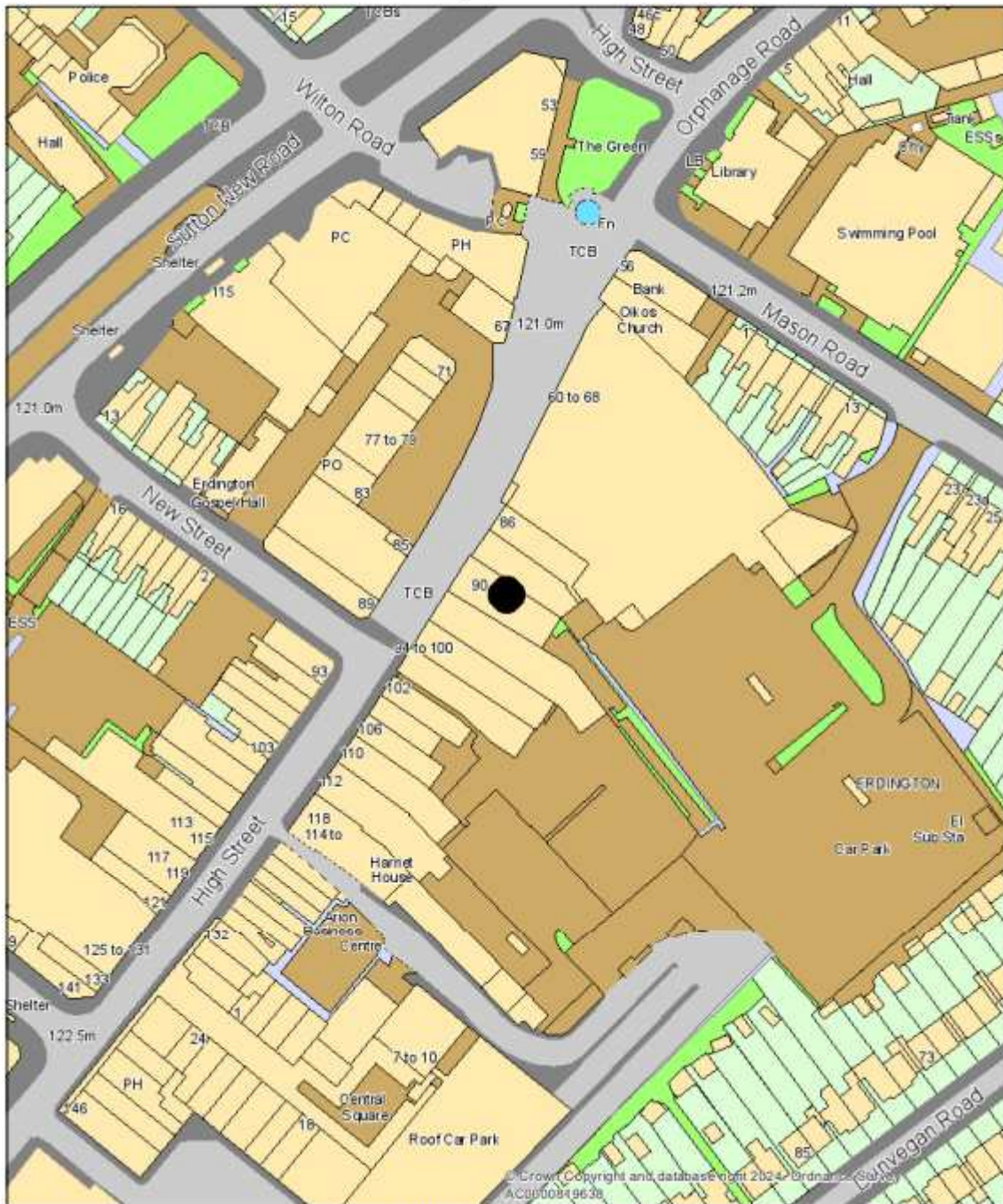
(iii) - Protecting children and other vulnerable people from being harmed or exploited by gambling (cont.)

Risk Event	Risk Category	Level of Risk (L / M / H)	Local Impact (L / M / H)	Risk Management	Review Date
Failure to administer the self-exclusion policy and thus failing to provide help for those who request assistance in preventing them from gaining access to gambling services.	Failure to recognise signs associated with problem gambling.	Moderate	Moderate on business Low on customers	1. Employees receive Social Responsibility training at induction and receive regular refresher training (annually). 2. Staff trained to recognise signs of players displaying 'tell-tale' signs of problem related gambling behaviour.	Nov 2024
	Failure to provide information to players on responsible gambling.	Low	Low on business Low on customers	1. Staff trained on how to provide help to any player wishing to obtain information on problem gambling (including completion of Customer Interactions using IHL Smart Tablet) 2. Let's Keep It Fun leaflets are available at all entry points and public/customer toilets. 3. Safer Gambling QR code is available wherever Keep it Fun leaflets are stored and is placed on marketing POS.	Nov 2024
	Failure to properly administer the self-exclusion process and maintain thereafter, it's effectiveness, including breaches and reinstatements	Low	Low on business Low on persons wishing to self-exclude	1. Staff trained in company's self-exclusion policy. 2. Staff trained to complete self-exclusion process using IHL smart Tablet (a paper version is available as a back-up, in the event that IHL server is unavailable). 3. Company to participate in National self-exclusion database, via app-based software (external provider). 4. All incident records are reviewed by a member of the management team on a weekly basis. 6. Estate-wide incident data collected for review and regulatory return.	Nov 2024
Risk of persons self-excluded entering premises, unknown to staff	Risk of problem gamblers utilising gambling services and gaming machines	Moderate	Low on business Low on self-excluded persons	1. Employees trained in self-exclusion policy. 2. Social responsibility records available for all staff and reviewed by management on a regular basis. 4. (Premises specific) The provision of gambling services may require interaction with a member of staff. 5. Nationwide self-exclusion policy (via external app software).	Nov 2024

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