

**Table of Responses to Spelthorne Borough Council's Draft Statement of  
Gambling Policy 2016-2019**

<b>Response From</b>	<b>Summary of comments made</b>	<b>Proposed amendment/ comment</b>
Coral	<p>Page 6 reference to “Campaign for Fairer Gambling” – comment that Coral were “surprised” that we make reference to such a group.</p> <p>Use of the term FOBT</p> <p>Section 2.3 (Location) Policy should make clear that there is no evidence that the proximity of schools causes harm to the Licensing Objectives.</p> <p>Risk assessment criteria disproportionate</p>	<p>The reference in the policy outlines research conducted by The Campaign for Fairer Gambling. However Gambling Commission guidance says that an effective Local Area Profile is likely to take into account a wide range of factors, data and information to help inform specific risks that operators need to address. Its inclusion is intended to assist applicants in conducting the necessary risk assessments when submitting applications. Wording has therefore been added to make this clear.</p> <p>The term “Fixed Odds Betting Terminals” (FOBT) is well recognised in describing the machines commonly found in betting shops. However wording has been added to reflect the fact that such machines are legally known as Category B2 Gaming Machines</p> <p>Section 6.50 of the Gambling Act guidance says an “area might be identified as high risk on the basis that it is close to a youth centre, rehabilitation centre, or school”. The draft policy is therefore consistent with Gambling Act guidance in this respect. The Section also makes clear that the Council will consider location on a case-by-case basis. No alteration is therefore proposed.</p> <p>Wide ranging criteria has been listed to assist applicants. Not all</p>

		criteria or will be relevant in every case. Alteration has been made to the wording to make this clear.
Resident	Expressed a view that betting shops should not be permitted licences in conservation areas	Statutory guidance makes it clear that planning issues must not form part of the consideration for an application for a premises licence. No change is therefore proposed.
Racecourse Association Ltd	Generic response in which the Council is asked to note the particular circumstances of racecourses in relation to location, door supervisors and conditions on rules being displayed	Noted.
Gosschalks Solicitors (acting for the Association of British Bookmakers (ABB))	<p>Paragraph 1.2 (Local Area Profile). Request that final paragraph of 1.2, which includes statistics on problem gambling compiled by "The Campaign for Fairer Gambling".</p> <p>Paragraph 1.5. Request that the paragraph include further examples of irrelevant considerations, as outlined in Paragraph 2.1</p> <p>Paragraph 2.4 (Risk assessments for betting premises). Matters to be taken into account are too prescriptive and some cannot be relevant.</p> <p>Paragraph 2.5 (Conditions) Request addition of a statement that conditions that are additional to the mandatory and default conditions will only be imposed where there is evidence of risks to the licensing objectives</p>	<p>Wording added to make clear that the statistics are there to assist applicants in completing their risk assessments as part of a local area profile only.</p> <p>Bullet points added</p> <p>Wording added to make clear that each application will be considered on a case by case basis.</p> <p>Wording added.</p>