

**Good evening.**

**I am writing to object to the licence application made for an Adult Gaming Centre at 39 Church Road, Ashford TW15 2QF, premises formerly occupied by Barclays Bank.**

**I am writing to make representation on behalf of the Chief Constable of Surrey Police in regards to the above Adult Gaming Centre Application.**

**The three licensing objectives under the Gambling Act 2005 are:**

**Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,**

**Ensuring that gambling is conducted in a fair and open way and,**

**Protecting children and other vulnerable persons from being harmed or exploited by gambling.**

**I object based on the above objectives not being met by the current proposed conditions.**

**The premises is located in the main road in Ashford where there are numerous shops and a public library frequented by many children. The area is popular for children and families to frequent both before and after school and at weekends. In the immediate vicinity there are residential areas and children pass through this parade of shops to their homes.**

**Ashford itself had the worst crime rate for Surrey in 2024 involving theft from person with a crime rate 0.26 per 1,000 daytime population. The most common crimes in Ashford are violence and sexual offences, with 645 offences during 2023, giving a crime rate of 42. A significant increase on reports from 2022. Over the last 24 months, Ashford's crime risk score has shown an upward trend, indicating that the risk profile is going up. The three most prolific crimes related in Ashford are, shoplifting, vehicle crime and public order. There has also been an increase in Robbery and possession of weapons, however, there has been a decrease in drugs offences.**

**Ashford's town centre has seen a general downturn in the local economy with fewer shops and limited improvements. Whilst there is a local youth centre and library there are limited other public services. The general feeling in the community is one that has been abandoned by local public services and that crime/ASB is committed with impunity**

**The 24-hour nature of the premises may place additional strain on police resources so we want to ensure that the premises has included preventive measures that will prevent this premises having a negative impact on crime and anti-social behaviour in the area. A consequence of this is the implementation of clear, hold and build into Ashford by Surrey police. This process is dependent on key agencies and partners working with us. The**

**benefits to a successful clear, hold build are; safer streets and homes, reduce gang activity and long term community resilience.**

**We have taken into account the risk assessment and conditions that they have proposed but we believe that additional conditions will ensure that they are addressing their responsibility in ensuring that the premises will operate to ensure the safety and security of the site and its customers as well as safeguarding the adjoining neighbouring occupiers.**

**Some of the conditions attached have already been proposed by the applicant but we have added extra conditions that we determine are required for this site and its location.**

**The conditions we have proposed will promote the protection of children and other vulnerable persons from being harmed, such as the cameras outside to be monitored by the staff in the premises will ensure that the staff are able to see their customers who are outside and any engagement with children passing the premises.**

**Should the applicant agree to these conditions, then we will withdraw this objection.**

**Please also see attached my delegated authority.**

**Many thanks,**

### **CONDITIONS PROPOSED**

#### **CCTV**

The venue shall install and maintain a comprehensive CCTV system at the premises as per the following minimum requirements.

The system should cover:

- All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions.
- The areas of the premises to which the public have access (excluding toilets).
- Gaming machines and counter area.

In addition :

There shall be external cameras which will provide live images to staff.

Notices indicating that CCTV is in use at the premises shall be placed at or near the entrance to the premises and within the premises.

A colour monitor shall be placed inside the premises above the front door showing CCTV images of customers entering and exiting the premises.

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### Operation of the system:

The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of thirty-one days with date and time visible. Recordings shall be immediately arranged by a member of staff for handover to Police or authorised officer following their request.

A staff member from the premises who is conversant with the operation of the CCTV system shall always be on the premises when the premises are open to the public. This staff member shall be able to arrange for Police to view recent data or footage with the absolute minimum of delay when requested.

The licensee shall provide training on the CCTV system and how to access the footage if requested to do so by the Police or other authorised officers as part of the staff induction training programme or as and when the system is changed and periodically provide refresher training.

Training including refresher shall be formally recorded on each member of staffs training records, which if requested will be presented to the Police or Licensing Authority as soon as practicable.

### **Security**

A magnetic locking device will be installed and maintained on the main entrance / exit to the premises which will be operable by staff.

This will be in operation between the hours of 22:00 and 08:00 and at any time when there is only one member of staff in the licensable areas.

An infra-red beam connected to a sounder will be installed and maintained at the entrance of the premises to notify staff when a customer enters or exits the premises.

### **Staffing levels**

A minimum of two members of staff will be on duty for the duration of the period in which licensable activities are taking place on the premises.

Staffing levels will consider ongoing police advice

A bound and paginated incident log shall be kept by the premises and made available on request to Police or Licensing Authority which will record the following:

- All crimes reported to the venue
- Any complaints received regarding crime and disorder

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- Any customers asked to leave
- Any incidents of disorder
- Any faults in the CCTV system, detailing action taken
- Any visits by a relevant authority or an emergency service
- Any attempts by person under 18 to gain access to the premises
- Any challenge 25 refusals

Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of the policy.

The licensee will ensure through checks and intervention that customer's children are not left unsupervised outside the premises.

Staff training records will be maintained. Periodically provide refresher training to all its staff working at these premises on the specific local risk to the licensing objectives.

For customers who exit the premises to smoke they will be directed by the staff to an area which will not cause a disturbance to neighbours from their smoke or noise.

The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.

Customers shall not be permitted to leave bags or other belongings at the premises, including when going outside to smoke.

The licensee shall not offer any enticement promotions, such as happy hours during which gaming machines stakes are reduced.

The licensee shall engage with the Police regularly and discuss any additional measures to reduce crime and disorder.