

Adult Gaming Centre – Licensing Authority Representation against the grant of a Premises Licence.

Acting as a Responsible Authority the Licensing Authority objects to the granting of the premises licence made under the Gambling Act 2005 for an adult gaming centre at 39 Church Road, Ashford. The details of the reasons for objection are outlined below.

Introduction

There is increasing awareness about the harms that can be caused by gambling and its impact on families and local communities, as well as the individuals directly affected by it. The prevalence of high street gambling premises; the significant increase in gambling advertising since the introduction of the Gambling Act in 2005; and the rise in online gambling have all contributed to societal concern about gambling in the UK and the harm that can be associated with it.

Gambling harms are now recognised as a public health issue but is a complex issue and has many interlinked factors.

The Mental Health Foundation details on their website that:

‘Gambling can cause low self-esteem, stress, anxiety and depression if gambling becomes a problem’. It goes on to say ‘Gambling can become an addiction, just like drugs or alcohol, if you use it compulsively or feel out of control. Gambling can affect the part of our brain that releases dopamine. A ‘feel good’ hormone that creates feelings of pleasure and reward. When we win a bet, our brain gives us an emotional reward. If you get addicted to gambling, other pleasurable activities may no longer make you feel good. So instead, you will gamble to get the same buzz....There’s also a strong link between gambling problems and thoughts of [suicide](#)...If you have a mental health problem, you’re more at risk of harmful gambling. For example, you may gamble to feel better about yourself when you’re depressed or distract yourself if you’re angry or upset.’¹

Spelthorne Borough Council has a duty to its residents to try and prevent any harm befalling them. As per Spelthorne Borough Council’s Statement of Licensing Policy 1.1.3²:

The overriding objective of the Licensing Authority is to regulate gambling in the public interest. Accordingly, in exercising the functions under the Act, the Licensing Authority will have regard to the licensing objectives as set out in section 1 of the Act. The licensing objectives 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.*

¹ [Gambling and mental health | Mental Health Foundation](#)

² [Gambling Premises Licences - Spelthorne Borough Council](#)

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When exercising functions for the licensing of premises for gambling, Licensing Authority will also act in accordance with section 153 of the Act which requires the Licensing Authority to permit the use of premises for gambling as far as they believe:

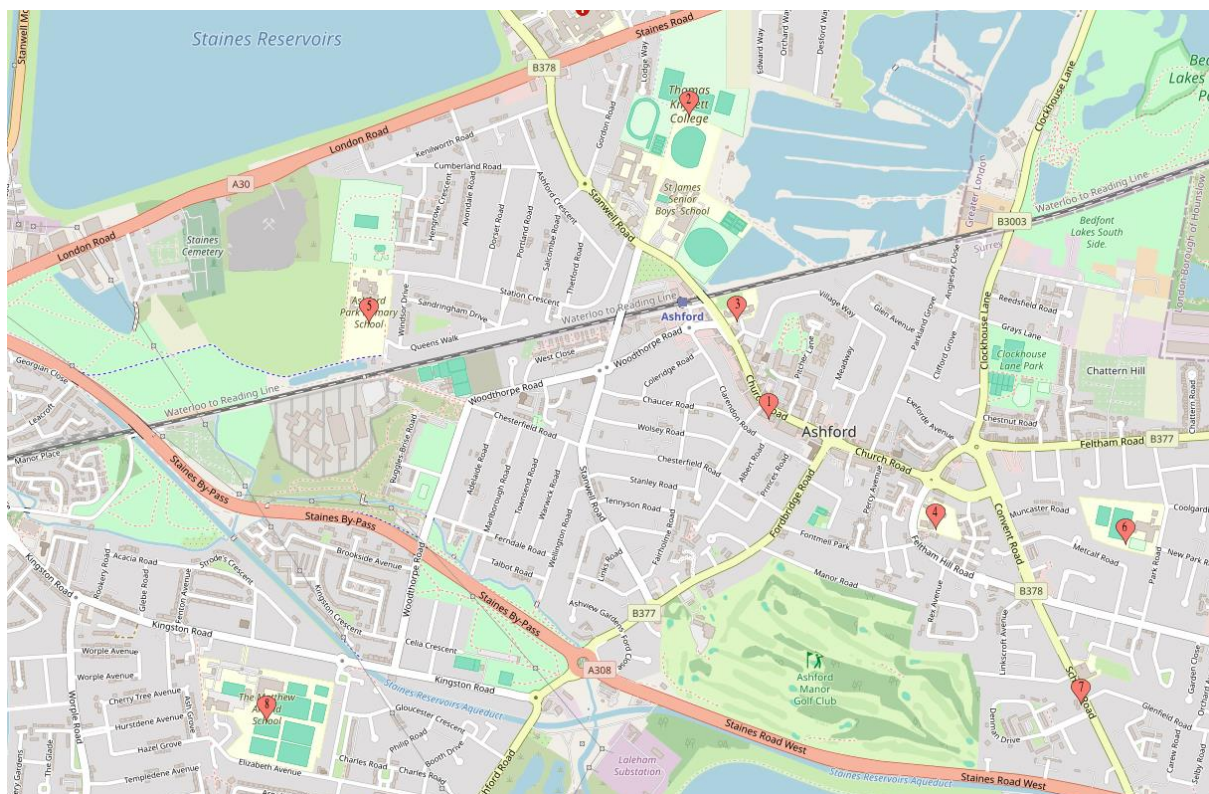
- a) is in accordance with any relevant code of practice under section 24.*
- b) is in accordance with any relevant guidance issued by the Commission under section 25.*
- c) is consistent with the licensing objectives (subject to paragraphs (a) and (b)).*
- d) is in accordance with the statement published by the authority under section 349 (subject to paragraphs (a) to (c)).*

As per statement of licensing policy section 2.3 *'the location of premises, may be relevant to the promotion of the licensing objectives. In particular, premises located in close proximity to the following may give rise to concern:*

- *Schools*
- *Vulnerable adult centres*
- *Residential areas with a high concentration of children.'*

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

There are seven schools within 1.71km (1mile). Five of these age range is from 4 – 11 years and the other two 11-16. A map showing the distance from the proposed site listed as 'number one' on the below map (produced online³).



³ [Create a map | Mapcustomizer.com](https://www.mapcustomizer.com)

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It is not unusual for younger siblings to attend the early years schools and have brother and sisters in the older range. If any of the older children become involved in gambling the younger one would be exposed to this.

Name of School	Age of children	Distance from proposed site	Number on Map above
Thomas Knyvett College Stanwell Road, Ashford, TW15 3DU	age 11-16	0.5 mile whose catchment area cover Stanwell North, Ashford North and Stanwell South.	2
Clarendon Primary School Knapp Road Ashford TW15 2HZ	age 4-11	0.16 miles 281 yards	3
St Michael's Primary School, Feltham Hill Road, Ashford, TW15 2DG	Age 4 - 11	0.35 miles 616 yards	4
Ashford Park Primary School Station Crescent, Ashford, TW15 3HN	Age 4 – 11	0.71 miles 1,249 yards	5
The Echelford Primary School Park Road, Ashford, TW15 1EX	Age 4 - 11	0.77 miles 1,355 yards	6
Ashford CofE Primary School School Road, Ashford, TW15 2BW	Age 4 – 11	0.77 miles 1,355 yards	7
The Matthew Arnold School Kingston Road, Staines, TW18 1PF	Age 11 - 16	1.06 miles 1,865 yards	8

As per the above this is a high concentration of young children in the area who attend schools near the premises and are likely to walk past the premises daily. In addition, their parents or carers who may be vulnerable will also walk past the premises and are then exposed to Gambling Harm

According to a gov.uk document:

'According to [2020 YouGov data on gambling treatment and support](#) (PDF, 1.4MB), around 7% of the population of Great Britain (adults and children) were found to be negatively affected by someone else's gambling.

Affected others are more likely to be women. The most severe impacts of problem gambling were felt most by immediate family members. Almost half (48%) of people who were affected by a spouse or partner's gambling reported a severe negative impact. This was followed by people affected by the gambling of a parent (41%) and the gambling of a child (38%).'⁴

⁴ [Gambling-related harms evidence review: summary - GOV.UK](#)

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Thomas Knyvett School catchment area covers both these areas, this school is 0.87km (.5 miles) from the gaming centre. This school has a high number than average of⁵:

	School	Local Authority	England state-funded schools
Overall absence	10.7%	8%	8.9%
Persistent absence	33.5%	21.9%	25.6%
Pupils with an SEN Education, Health and Care Plan	3%		2.7%
Pupils whose first language is not English	28.4%		18.6%
Pupils eligible for free school meals at any time during the past 6 years	32.2%		27.3%

It therefore seems from the above that there is a higher number of both vulnerable and deprived children at Thomas Knyvett School. It could be argued that if these pupils are exposed to a parental lifestyle which includes gambling they will be much more likely to try this for themselves. School children are unlikely to wear uniform when they know it shows their age if they were to try and attempt to gain entry.

Clarendon Primary School Knapp Road Ashford TW15 2HZ has children attending who are age 4-11 and it is located 0.26km from the adult gaming centre. This school has a high number than average of⁶:

	School	Local Authority	England state-funded schools
Overall absence	5.7%	5.2%	5.5%
Persistent absence	13.3%	12.1%	14.6%
Pupils whose first language is not English	26%		22.8%
Pupils eligible for free school meals at any time during the past 6 years	28.8%		25.9%

⁷The gov.uk report states that ‘Child gamblers noted difficulties at school. Children of gamblers also noted difficulties at school because of the chaotic home life associated with a gambling parent. Absenteeism, job turnover, withdrawal from education or reduced educational attainment represent societal harms.’ Whilst the Licensing Authority does not know why children have been absent from school we are concerned

⁵ [Thomas Knyvett College - Compare school and college performance data in England - GOV.UK](#)

⁶ [Clarendon Primary School - Compare school and college performance data in England - GOV.UK](#)

⁴ See publications for more details: <https://www.gambleaware.org/sites/default/files/2022-07/GambleAware%20Stigma%20Final.pdf> and https://www.gambleaware.org/sites/default/files/2023-03/Minority%20Communities%20Final%20Report_0.pdf

⁷ [Gambling-related harms evidence review: summary - GOV.UK](#)

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that should this licence be granted that Gambling could negatively impact on families and therefore on children. This would affect potentially their attendance at school. Whilst the study states that the proportion of children and young people (11-16) who participate in Gambling is reducing, Ashford is still a deprived area with a high crime rate.

The NottAlone website states that an affect of signs of harm from Gambling in children and young people, amongst other things leads to a lot of sick days or days off.⁸:

‘Gambling can harm a young person’s physical and mental health, their relationships with family and friends, how much money they have, their school/college work or their job. These are sometimes called gambling-related harms.

Harms can be experienced by the person that gambles, or by the family, friends, and colleagues of someone who gambles.

Some of the signs of harm in children and young people include:

- Having less time or money to spend on things they enjoy*
- Having reduced savings for big items such as university, holidays, or a first car*
- Increased use of alcohol or drugs*
- Taking a lot of sick days or days off, or missing extra-curricular commitments due to time spent gambling*
- Relationship problems, or being isolated’*

Gambling can affect a child’s mental health and physical health and lead to a detriment on their future due to school attendance/grades/finding it harder to concentrate.

Gamble aware have done a study and where English is not someone’s first language they can have limited understanding about the risks involved in Gambling. This could therefore impact negatively on those in Ashford Community who English is not their first language and then their children and anyone else in the household. ,

Vulnerable adult centres

There are vulnerable adult centres nearby, number one on the map is the proposed site (produced online):⁹

⁸ [Gambling-related harm | NottAlone - Supporting Your Child](#)

⁹ [Create a map | Mapcustomizer.com](#)

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Name of Centre	Distance from proposed site	Number on map above
Studholme Medical Centre, 50 Church Road Ashford TW15 2TU	0.1 Miles 176 yards	2
Clarendon Family Centre, Knapp Road, TW15 2HZ	0.2 miles 352 yards	3
Ashford Mental Health Clinic, 66 Stanwell Road, Stanwell Ashford TW15 3DU	0.5 miles 880 yards	4

Ashford Library is opposite the premises. Libraries are attended by all members of the community. The Surrey County Council website publishes events at Ashford Library:

- Pebble Rhymetime¹⁰ – this is aimed at babies and toddlers under 5, with their parents and carers.
- ‘Summer Reading Challenge 2025, Story Garden: Adventures in Nature and the Great Outdoors’ is also advertised to take place over this current school holiday until 13 September 2025. Whilst the Licensing Authority appreciate this will have ended before the Committee determine this application, we have

¹⁰ [Events and activities at Ashford Library - Surrey County Council](#)

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deemed it necessary to advise as this could be repeated in other school holidays¹¹.

Homelessness

There is a 31-bed homeless hostel, The White House which is located 1 mile from the proposed site.

There is also Harper House in Fordbridge Road Ashford which provides emergency accommodation for up to 20 homeless families.

Crisis detail on their website that people who have experienced homeless are likely to have poor physical and mental health and are more vulnerable to issues relating to alcohol and drug use¹².

A study by Cambridge stated *'homeless people are ten times more likely to be problem gamblers than the UK population as a whole'*.¹³ A study commission in 2014 states *'These results confirm that the homeless constitute a vulnerable population for problem gambling, and that diagnostic tools for gambling involvement should be integrated into homelessness services in the UK.'*

The Licensing Authority cannot see how the applicant has demonstrated in their local area risk assessment how they will overcome the risk to vulnerable people who attend the health services mentioned above and homeless living accommodation. The granting of the License would undermine the licensing objectives based on the information provided.

Assessing Local Risk

Under the Gambling Commissions codes of practice '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'¹⁴.

According to the National Office for Statistics in Ashford Town¹⁵:

- In 2022 There was 7,900 people
- In 2021 there was 3,000 households

The National Office for statistics states the below in terms of 'household deprivation for 2021'¹⁶:

¹¹ [Summer Reading Challenge - Surrey County Council](#)

¹² [Health and wellbeing | Homelessness Knowledge Hub | Crisis UK](#)

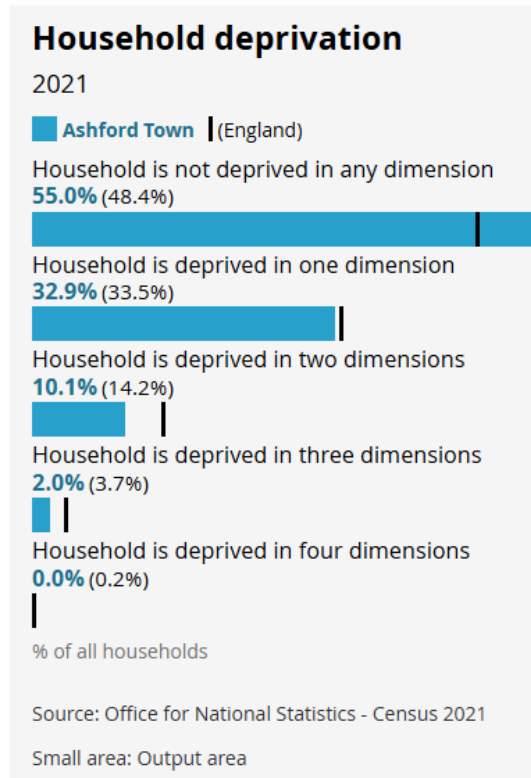
¹³ [New study reveals scale of problem gambling among homeless population | University of Cambridge](#)

¹⁴ [Codes of practice - 10 - Assessing local risk](#)

¹⁵ [Build a custom area profile - ONS](#)

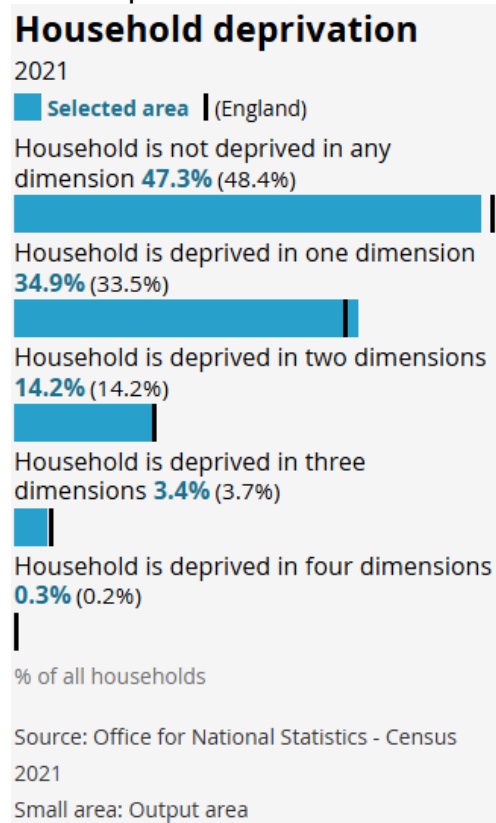
¹⁶ [Build a custom area profile - ONS](#)

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The Licensing Authority has searched on the office for national statistics website and within 1km radius the data available is:

- 2022 Population of 165,700
- 2011 number of households 63,400
- Below is the household deprivation:



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- Below is the 1km radius for Employment history for 2021 which shows 1 in 4 people have never worked:



The Licensing Authority note that in the local risk assessment it states that Ashford is located 'in one of the least deprived wards and is in the 20% least income deprived neighbourhood in England'. The Authority cannot see where this information has been obtained from, however it has noted that Healthy Surrey have published 'Surrey Health and Well-Being Strategy - updated 2022' ¹⁷. This states 'people living in geographic areas which experience the poorest health outcomes'.

- Electoral Ward - Stanwell North, Spelthorne is number 5 on the strategy. The website states that 'the top 5 are the initial priority areas'. It states that the 'primary care network' for this is 'Spelthorne, Staines, Ashford, Sunbury, Shepperton and Egham (SASSE) 3'.
- Electoral Ward – Ashford North and Stanwell South, Spelthorne is number 9 on the strategy. This states the 'primary care network' for this is 'SASSE 3'.

In addition, children and adults will visit Ashford from neighbouring towns and work and go to school there.

The gov.uk report makes reference to an increased number of electronic gaming venues in a local area increased the number of personal bankruptcies. ¹⁸ Adding another Gaming Centre in a deprived area such as Ashford could lead to an increase in bankruptcy.

'We examined financial harms in 31 studies. One high quality study reported that an increase in the number of electronic gaming venues in a local area increased the number of personal bankruptcies in that area. There was also considerable evidence from the qualitative studies that gambling directly causes financial harms to gamblers and their close associates, particularly intimate partners.

We identified gambling-related debt as a crucial harm that can lead to other harms such as relationship problems, physical and mental health problems, and crime.

The financial difficulties and debt experienced by gamblers and affected others were often severe. Several studies reported that gambling led to bankruptcy and housing

¹⁷ [Surrey Health and Well-Being Strategy - update 2022 | Healthy Surrey](#)

¹⁸ [Gambling-related harms evidence review: summary - GOV.UK](#)

problems including homelessness. Financial harms also affected the children of gamblers.'

Surrey Health and Well-Being Strategy – updated 2022:

There is a link with deprivation and many other social factors.

Demographic characteristics, such as age, income, and cultural background can influence gambling behaviours, shaping preferences, motivations, and risks.

Data shows that there are certain demographic groups (4) with relatively higher levels of 'problem gambling' than the England average. These include:

- *Younger people (aged 18-34): 6.8%, compared with 3.0% across all age groups.*
- *People from Black, Asian and other ethnic minority groups: 8.4%, compared with 2.2% for those of White ethnicity.*
- Spelthorne black, Asian and other ethnic minority groups is 21.3% compared to England 19.0%*
- *People who are unemployed or economically inactive: 4.1%, compared with 3.0% across England.*
- *Full-time students (linked to the higher prevalence among young adults): 6.8%, compared with 3.0% across all adults in England.*
- *People not in a relationship: 3.9%, compared with 2.2% for those in a relationship.*

The local gambling risk assessment raises several questions:

- The document states “the premises will be open 24/7 with at least 2 members of staff working on site at any given time on the basis of a maximum of 8 customers, if the numbers increase then an additional member of staff will be used for busier periods”. It goes on to state: *‘Staff are trained to monitor the external area around the entrance for any anti Social behaviour and to take appropriate steps. Anyone seen loitering around the entrance will be asked to move away.’*
 - It is not clear from the assessment what methodology will be applied when there is an increase of customers and what the customer to staff ratio will be.
 - In addition, if there was to be a customer rush and the number was to go over the 8 number of customers, it is not clear what would happen. E.g. would the premises close its doors and wait for another member of staff to arrive?
 - What would happen in the event they cannot get more staff? Will the premises be closed.
 - What will happen if people who are excluded try to enter and there is not enough staff?

The Licensing Authority struggle to understand how the 8 customers to 2 staff will be upheld as it is not clear from the risk assessment and how they will promote the licensing objections from this.

- There is mention of a ‘maglock’ in use between 22.00 and 08.00 however there is no mention of how many members of staff. How will the maglock work? How will customers contact the premises?

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The Licensing Authority are concerned that in the risk assessment it states 'stakes are returned to anyone who has played a category C or B gaming machine and unable to verify their age'. According to their risk assessment there is a risk that children could enter the premises unnoticed or unchallenged particularly after school and during school holidays.

There are numerous age verification procedures in the local area risk assessment but the last part states *'stakes returned to anyone who has played a category C or B gaming machine and unable to verify age'* This is saying that your procedures would not be sufficient to prevent underage gambling.

- Why is anyone unable to verify their age gaining entry to the premises?
- Why is there only money returned for category c or category b machines and not other machines of a different category ?
- There is no mention in the local risk assessment how age test purchase will take place?

The Licensing Authority is concerned about any crime and disorder which could occur late into the evening when customers arrive to the premises and are therefore unable to gain entry to the premises.

There has been no mention of what will happen if a person seeks entry who appears to be under the influence of drink or drugs or what the policy will be if alcohol was to be brought into the premises and drunk and the use of drugs.

The Gambling Act sets out three licensing objectives which will be referred to individually.

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

There are concerns that having an adult gambling centre in Church Road, Ashford will attract a larger volume of people who due to the nature of gambling will bring the associated problems with them. Involvement in criminal activity has been shown to increase when there is a lack of funds and this would be true with a gambling addiction. Shoplifting is a quick and easy way of obtaining cash and Ashford has a crime rate for this of 8.20 per 1,000 which is 1.33 the national average.

There are note takers and change machines cash only in the premises an ideal way to spend any proceeds of crime. The terms and conditions state they will only accept cash.

Church Road in the last few years has seen a downturn in the economy with numerous local shops closing down.

This is also show in the crime statistics.

Crimerate.co.uk updated August 2025

[Ashford, Surrey Crime and Safety Statistics | CrimeRate](#)

Ashford is the second most dangerous medium-sized town in Surrey, and is among the top 20 most dangerous overall out of Surrey's 105 towns, villages, and

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cities. The overall crime rate in Ashford in 2025 was 70 crimes per 1,000 people. This compares poorly to Surrey's overall crime rate, coming in 36% higher than the Surrey rate of 51 per 1,000 daytime population.

In February 2024, Ashford had the worst crime rate in Surrey for robbery, with 4 crimes reported and a crime rate of 0.17 per 1,000 daytime population. April 2024 was also a bad month for Ashford residents, when it was again Surrey's most dangerous area for robbery, recording 4 crimes at a rate of 0.17 per 1,000 daytime population.

The most common crimes in Ashford are violence and sexual offences, with 693 offences during 2025, giving a crime rate of 29. This is 1.3% higher than 2024's figure of 684 offences and a difference of 0.37 from 2024's crime rate of 28.

For the same period, Surrey Police recorded 693 reports of Violence and Sexual Offences in Ashford, resulting in a crime rate of 29 reports per 1,000.

This review has brought together and analysed the best available international research evidence on risk factors and gambling-related harms. The evidence suggests that harmful gambling should be considered a public health issue because it is associated with harms to individuals, their families, close associates and wider society. Gambling-related harms have considerable cost to the government and society, likely to be between £1.05 to 1.77 billion.

The most socio-economically deprived and disadvantaged groups in England have the lowest gambling participation rates, but the highest levels of harmful gambling and they are also the most susceptible to harm. So, if there are no interventions to improve this situation, harmful gambling is likely to make existing health inequalities worse. The harms identified in this report and the cost to society suggests that more needs to be done to prevent and reduce the harms associated with gambling.¹⁹

Conclusion

The Licensing Authority do not believe the location of this adult gaming centre is appropriate taking into account the demographic of schools, health centre, vulnerable people, crime rates and deprivation.

The Licensing Authority do not believe that the application takes into sufficient account of the location and the risks that it would produce and the staffing levels offered are insufficient. However, even if there was more staff deployed we do not believe this would resolve the issues at this location based on the data available.

In addition, the excess cost of harm associated with gambling within Spelthorne is above the UK average. Having another gaming centre in the wrong location as explained in my objection will have a negative impact on the public and health services²⁰

¹⁹ [Gambling-related harms evidence review: summary - GOV.UK](#)

²⁰ Gamble Aware Gambling harm data profile. Spelthorne

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Estimated Fiscal Costs of 'Problem Gambling'

In April 2023, the National Institute of Economic and Social Research (NIESR) estimated that the annual fiscal cost of 'problem gambling' (PGSI 8+) is roughly £1.4 billion (in 2023 prices)³.

The table below shows the excess cost of harm associated with gambling across Spelthorne and GB. NIESR's national figures have been apportioned to Spelthorne based on the Parliamentary Constituency's estimated share of the total number of people in Great Britain who are PGSI 8+. Using this methodology, the total fiscal cost of harm associated with 'problem gambling' in Spelthorne is estimated to be **£1,439,732**.

Cost of harm associated with gambling	Spelthorne	Great Britain
Health: General Medical Service Consultation (mental health)	£23,451	£21,600,000
Health: Hospital Inpatient	£484,977	£446,700,000
Crime: Crime Committed (police call out)	£34,742	£32,000,000
Crime: Court Appearance	£9,771	£9,000,000
Housing: Homelessness Support	£17,914	£16,500,000
Welfare: Universal Credit	£868,877	£800,300,000
Fiscal cost (£ millions)	£1,439,732	£1,400,000,000

Based on the location and the licensing objectives, together with the Guidance the Licensing Authority objects to the granting of this licence.

Stuart Bruce-Reid
Licensing Enforcement Officer
Spelthorne Borough Council