

Our Ref: AM/lo/ 030409

3<sup>rd</sup> April 2009

Kristie Ashenden  
Principal Licensing Officer  
Chaplin Centre  
Thurlow Street  
London  
SE17 2DG

**Councillor Adele Morris**

Liberal Democrat Member for Cathedrals Ward

Executive Member for Citizenship, Equalities  
and Communities

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Southwark Town Hall  
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03 April 2009

Dear Kristie,

**Re:** License application for Agora, 92-94 Borough High Street, SE1 1LJ

I am writing to object to the granting of 4 separate gaming licenses for the above premises. I believe that it is highly inappropriate for the ground floor of the premises to be subdivided into 4 units in order for the applicants to maximise the number of high payout machines, for the reasons set out below. In addition, whilst I am aware that planning matters are separate from licensing matters, I believe that the licensing department should be aware that the licence which was granted in December 2008 for use of the basement of the premises has no valid use because the applicants have no planning permission to operate such premises in the basement. In addition, the applicant has already commenced work on the premises to subdivide the ground floor into 4 units, and make alterations to the frontages on Union St and Borough High St despite the fact that planning permission has not been granted for such works, nor has a license been issued.

My reasons for objection are:

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

These premises are located on the main high street, in a prominent corner position. It is on the route to 2 nearby primary schools – St Joseph's off Borough High St and Cathedral School in Redcross way – both of which are within 200m of the premises. The route to and from the schools is along Union St, past the premises, and is the main route taken by some 200 or so families who live on the Tabard Gardens housing estate, which is located just off Borough High St, across from the gaming premises.

Adjacent to the schools and to the south west of the premises is the Redcross Way housing Estate, and to the north west of the premises is the Park St housing Estate. Over 60% of housing in Borough and Bankside is rented from either the council or a

registered social landlord.

Cathedrals ward has a higher than average street population, and it also has the highest concentration of drug and alcohol rehabilitation centres and homeless hostels in Southwark. There is a well documented problem with antisocial behaviour issues in the area, the topic of many public meetings with the police and community safety teams. In nearby Great Guildford Street, there is a homeless hostel.

100m along Union St on the South side of the road is the Marlborough Playground – a large sports area which is primarily used by older children and young adults, and to the South of St Joseph's School is little Dorrit Park – which is very well used by the children from the 2 schools and the surrounding area. Opposite Cathedral school on Redcross way is Redcross Gardens, which runs a number of regular gardening clubs and events for young children.

Southwark Cathedral is not more than 200 metres from the premises.

In addition, the applicants already run a similar establishment less than 100m along the high street. I understand that residents will be contacting the licensing department separately with their concerns about the operation of those premises.

### **Crime and disorder**

Evidence from the first NHS gambling clinic suggests that high-stakes gaming machines that were introduced in their thousands after a relaxation of the gambling laws are causing serious addiction problems.

Almost two thirds of people admitted to the National Problem Gambling Clinic are suffering from habits exacerbated by games terminals found in all of Britain's 8,500 betting shops.

An internal audit carried out by the clinic — offering the first robust clinical statistics on the triggers for problem gambling — reveals that more than 60 out of more than 100 people referred have addictions that are encouraged by fixed-odds betting terminals (FOBTs).

Responding to concerns about the terminals' addictive format, which has been described as "the crack cocaine of gambling", the Government agreed to draw up a code of practice limiting bookmakers to four machines per venue and a maximum £500 win. **This application is deliberately designed to flaunt that rule, which was put in by the Government to protect the most vulnerable in our society!**

It is said that users of these machines can lose £1,000 in less than half an hour.

The pioneering NHS gambling clinic is part of the Central and North West London NHS Foundation Trust, is the first free clinician-led treatment programme and has provided statistics on the types of problem gambling and their effects.



A spokesperson for the clinic said "We are building up the first proper evidence-based data set, which can show the triggers and levels of addiction, the spend, the frequency and the negative consequences," she said, adding that she intended to publish a full audit of findings later in the year.

"We were not really prepared for the level of demand for the service," she said, adding that the main cause of gambling problems appeared to be FOBTs, online sites and race betting. "A lot of people who start off betting on horses and dogs, and have started to develop a problem, have migrated to FOBTs and online sites. It's the immediacy of the gratification, the cycle of excitement. It is the way the machine taps into the reward pathways of the brain. "I have people coming into my clinic who have not eaten properly for months. They are emaciated because they are on such tight food budgets because of their debts."

A spokeswoman for GamCare, the industry-funded counselling service, said that FOBTs seemed to be particularly attractive to problem gamblers..

The Department for Culture, Media and Sport has asked the Gambling Commission to investigate the link between FOBTs and an increase in problem gamblers. The commission will submit its findings in the summer.

DCMS spokesman said:

"Ministers have made it clear that they view with concern the growing popularity of these fixed odds machines offering high prizes.

"At our request, the Gambling Commission is making a high priority research to identify the risks these machines may pose in relation to problem gambling and they will provide an update and recommendations by this summer.

Available research seems to indicate that problem gamblers will tend to risk money on whatever game is available, rather than a particular game being available inducing problem gambling in otherwise "normal" individuals. However, research also indicates that problem gamblers tend to risk money on fast-paced games. Thus a problem gambler is much more likely to lose a lot of money on roulette or slot machines where rounds end quickly and there is a constant temptation to play again or increase bets, as opposed to a lottery where the gambler must wait until the next drawing to see results. It is estimated that thirty percent of the profits from gambling machines come from problem gamblers.

As debts build up people turn to other sources of money such as theft or the sale of drugs. A lot of this pressure comes from bookies or loan sharks that people rely on for capital to gamble with. Also, a teenager that does not receive treatment for pathological gambling when in their desperation phase may contemplate suicide.

Yours Sincerely,

**Councillor Adele Morris**  
**Executive Member for Communities, Equalities & Citizenship**  
**Liberal Democrat Member for Cathedrals Ward**

## Ashenden, Kristie

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**From:** Morris, Adele  
**Sent:** 08 April 2009 11:16  
**To:** Ashenden, Kristie  
**Subject:** Re: Emailing: gambling objection

Dear Kristie

Yes I can confirm that my representation relates to each proposed premises at that address: Unit 1, Unit 2, Unit 3 and Unit 4, 92-94 Borough High St.

I can update and resend the letter if it helps?

Best wishes

Cllr Adele Morris  
Executive Member for Citizenship, Equalities and Communities Town Hall Peckham Rd  
SE5 8UB

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----- Original Message -----  
**From:** Ashenden, Kristie  
**To:** Morris, Adele  
**Sent:** Wed Apr 08 09:05:27 2009  
**Subject:** RE: Emailing: gambling objection

Dear Cllr Morris,

Thank you for your representation. For clarity, can you please just confirm that your representation relates to each proposed premises at that address: Unit 1, Unit 2, Unit 3 and Unit 4, 92-94 Borough High St. An email will be sufficient.

Regards

Kristie Ashenden  
Principal Licensing Officer  
London Borough of Southwark  
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Ph: 020 7525 5754  
Fax: 020 7525 5705  
<http://licensing.southwarksites.com/>

-----Original Message-----  
**From:** Morris, Adele  
**Sent:** 06 April 2009 17:10  
**To:** Ashenden, Kristie  
**Subject:** Emailing: gambling objection

Hi Kristie

Please see attached objection letter. I have sent a hard copy to you as well - please let me know if it is OK or needs changing at all.

Best wishes

Cllr Adele Morris

Liberal Democrat Councillor for Cathedrals Ward Executive Member for Citizenship,  
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