# **Richmond Gambling Policy Review 2018** There were 34 responses to this consultation

### Question 1

Please tell us your name or the name of your organisation:

This open response (free text) question was answered by 33 respondents.

Responses removed due to data protection.

### **Question 2**

If responding on behalf of an organisation, please indicate that you have the authority to respond on their behalf by clicking the box below.

This single response question was answered by 3 respondents.

Response	Number of respondents to	Percentage of respondents to
Yes	3	8.8%

## Question 3

Please tell us your address:

This open response (free text) question was answered by 34 respondents.

Responses removed due to data protection.

#### **Question 4**

Do you feel the draft statement is clearly written?

This single response question was answered by 33 respondents.

Response	Number of Respondents	Percentage of Respondents
Yes	29	87.9%
No	4	12.1%

If no, how can it be improved?

This open response (free text) question was answered by 5 respondents.

Response

Number of Respondents

I think it expresses two conflicting	
statements: i) that the objective is to	
ensure that the gambling policy does not	
endanger young children, among others ii)	
that moral objections will not be considered.	
Why are issues of the morality or otherwise	
of gambling excluded from consideration.	
Gambling inflicts untold misery and poverty	
on families, especially children, and this is	
both a practical and moral issue. Gambling	
should not be encouraged since the	
addictions it leads to are neither controlled	
nor properly managed by	
society/government and the harm it causes	
to children and families is inadequately	
recognised or addressed.	
recognised of addressed.	1
Generally but feel that more emphasis	1
,	
should be placed on vulnerable adults in	
13.7, 13.8 and 17.2 to reflect the need for	
this group to be protected. Include houses	
specifically for vulnerable adults in	
supported living in areas not acceptable.	
	1
The draft statement includes all the	
procedure for defining the statement and	
the legislative information and hence is	
absurdly overlong. Keep them separate.	
People want to know what policy is, not how	
it was achieved	1
Delegation to officers.	
Cancellation of licensed premises gaming	
machine permits.	
This is not clear, does this means officers can	
just cancel them? or does it mean the	
orignal applicant can request cancellation?,	
therefore office involvement is incidental. If	
it is the former then surely this should be for	
the licensing committee as is done with a	
review, the latter is acceptable, but this	
should be made clearer.	
	1
There doesn't seem to be any mention of	-
advertising - maybe I missed it - but I would	
like the advertising of betting banned in the	
borough.	1
	1

Question 5			
Do you feel the draft statement is easy to understand?			
This single response question was answered by 33 respondents.			
Bie espense question ma			
	Number of Respondents	Percentage of Respondents	
Response Yes		Percentage of Respondents 93.9%	

## If no, how can it be improved?

# This open response (free text) question was answered by 3 respondents.

Response	Number of Respondents
see above	1
Maybe there should be simplified guidance	
at the start of the document - and then the	
detailed guidance.	
Most people are not going to plow through the whole document - some infographics could also make it more engaging too and bring the document into the modern age.	
bring the document into the modern age.	1
Shorten it and break the single document	
into seperate parts so that the legfislative	
information and the procedure for achieving	
the policy are kept apart. People want to	
know what policy is, not how it was achieved	
	1

# Question 6

Are there any specific locations you feel would be unsuitable for gambling premises?

This single response question was answered by 32 respondents.

Response	Number of Respondents	Percentage of Respondents
Yes	23	71.9%
No	9	28.1%

Please state your reasons for this conclusion.

This open response (Free text) question was answered by 22 respondents.

Response

Number of Respondents

In the High Streets, where it would	
encourage people to feel that gambling is	
both a safe part of community life and	
countenanced by our elected leaders.	1
As above where there are vulnerable adults	
in supported living and also, thinking ahead,	
where there is a children's home.	
Additionally, any area where children play	
and close to nurseries.	
	1
I agree with the revised wording in section	
17.2 of the draft statement.	1
Central Twickenham and Richmond as there	
are many bars and some people who are	
intoxicated are not in full control of their	
decision making and might gamble away	
more than they can afford. These days	
people don't need to go to a premises if they	
wish to gamble as it can be done on phones	
or the internet. Libraries will hopefully	
restrict the use of certain websites including	
gambling ones.	
	1
Areas close to schools or youth centres	1
Areas close to schools of youth centres	
Because some places would expose	
	1
Because some places would expose	1
Because some places would expose vunerable people	1
Because some places would expose vunerable people Anywhere too 'close' to where children go.	
Because some places would expose vunerable people Anywhere too 'close' to where children go. e.g. parkers, shopping centres.	
Because some places would expose vunerable people Anywhere too 'close' to where children go. e.g. parkers, shopping centres. Richmond is a largely family residential	1
Because some places would expose vunerable people Anywhere too 'close' to where children go. e.g. parkers, shopping centres. Richmond is a largely family residential borough.	1
Because some places would expose vunerable people Anywhere too 'close' to where children go. e.g. parkers, shopping centres. Richmond is a largely family residential borough. Kew Village and St Margarets "village" are	1
Because some places would expose vunerable people Anywhere too 'close' to where children go. e.g. parkers, shopping centres. Richmond is a largely family residential borough. Kew Village and St Margarets "village" are community centres that also have special	1
Because some places would expose vunerable people Anywhere too 'close' to where children go. e.g. parkers, shopping centres. Richmond is a largely family residential borough. Kew Village and St Margarets "village" are community centres that also have special events e.g Christmas Fayres, Fish Market,	1
Because some places would expose vunerable people Anywhere too 'close' to where children go. e.g. parkers, shopping centres. Richmond is a largely family residential borough. Kew Village and St Margarets "village" are community centres that also have special events e.g Christmas Fayres, Fish Market, Crown Street Party Near schools & parks Church road Twickenham	1 1 1
Because some places would expose vunerable people Anywhere too 'close' to where children go. e.g. parkers, shopping centres. Richmond is a largely family residential borough. Kew Village and St Margarets "village" are community centres that also have special events e.g Christmas Fayres, Fish Market, Crown Street Party Near schools & parks Church road Twickenham The betting shops do not match the	1 1 1
Because some places would expose vunerable people Anywhere too 'close' to where children go. e.g. parkers, shopping centres. Richmond is a largely family residential borough. Kew Village and St Margarets "village" are community centres that also have special events e.g Christmas Fayres, Fish Market, Crown Street Party Near schools & parks Church road Twickenham	1 1 1
Because some places would expose vunerable people Anywhere too 'close' to where children go. e.g. parkers, shopping centres. Richmond is a largely family residential borough. Kew Village and St Margarets "village" are community centres that also have special events e.g Christmas Fayres, Fish Market, Crown Street Party Near schools & parks Church road Twickenham The betting shops do not match the character of the street and degrade the look of the street especially in such a prominent	1 1 1
Because some places would expose vunerable people Anywhere too 'close' to where children go. e.g. parkers, shopping centres. Richmond is a largely family residential borough. Kew Village and St Margarets "village" are community centres that also have special events e.g Christmas Fayres, Fish Market, Crown Street Party Near schools & parks Church road Twickenham The betting shops do not match the character of the street and degrade the look	1 1 1
Because some places would expose vunerable people Anywhere too 'close' to where children go. e.g. parkers, shopping centres. Richmond is a largely family residential borough. Kew Village and St Margarets "village" are community centres that also have special events e.g Christmas Fayres, Fish Market, Crown Street Party Near schools & parks Church road Twickenham The betting shops do not match the character of the street and degrade the look of the street especially in such a prominent	1 1 1 1
Because some places would expose vunerable people Anywhere too 'close' to where children go. e.g. parkers, shopping centres. Richmond is a largely family residential borough. Kew Village and St Margarets "village" are community centres that also have special events e.g Christmas Fayres, Fish Market, Crown Street Party Near schools & parks Church road Twickenham The betting shops do not match the character of the street and degrade the look of the street especially in such a prominent position	1 1 1 1

As in the policy, close proximity to places	
where people vulnerable to exploitation are	
likely to be found.	
Sec. 17.2 should include further education	
colleges as well as schools, as many FE	
students are aged under 18.	1
Given the nature of the borough's villages	-
any 'high street' location is likely to be	
, , ,	
'proximate' to schools, churches, hostels	
and residential areas that are included in	
section 17. There are very few areas of this	
borough that do no fall within this scope of	
special, consideration.	
	1
Location in areas where a school is co-	
located, by definition this also means	
planning should be aware before granting	
permission for a school premises in the same	
area, the school plan should be refused	
under the guidlines and not the existing	
premises being subject to a review.	
premises being subject to a review.	1
Any where near a local school,	1
playground/Park.	
Located close to pubs as drinkers may be	
attracted to gambling after a few drinks and	
would be less in control of knowing when to	
stop.	
Having a gambling premises replacing a local	
shop.	1
No space in Twickenham for casinos. There	
is already a gambling shop on high street	
which I think is sufficient.	
	1
Residential areas. Keep them on the high	
street or where existing shops are located.	
Minimise disruption to residents.	
	1
Anywhere other than high streets or other	
public shopping areas.	1
Near Pubs and clubs, Schools, Church Halls,	
Hospitals, Fast food outlets, Sports Centres -	
basically anywhere vulnerable people and	
children meet/congregate.	1
1. Residential Areas	
2. Mixed use areas such as Richmond Town	
centre except in moderation	1

### Do you want a casino in the borough?

This single response question was answered by 33 respondents.
---

Response	Number of Respondents	Percentage of Respondents
Yes	2	6.1%
No	31	93.9%

## **Question 8**

Should the Council pass another resolution not to have any casinos in the borough as the previous policy at paragraph 24.2?

## This single response question was answered by 32 respondents.

Response	Number of Respondents	Percentage of Respondents
Yes	26	81.3%
No	6	18.8%

### Please state your reasons for this conclusion.

### This open response (free text) question was answered by 26 respondents.

Response	Number of Respondents
They encourage gambling, they "normalise"	
it, whereas it should be discouraged.	
	1
The area is unsuitable and there are casinos	
in central London which can be easily	
reached if required.	1
A need to ensure the message is current and	
conflicting views measured	1
1. The town centres in the borough all	
include a lot of residential property, schools	
and family venues. It would be	
inappropriate to have a casino nearby which	
may make gambling appear attractive to	
young people and the vulnerable. 2.	
Potentially inebriated customers leaving	
casino premises late at night /in the early	
hours will cause disturbance to others.	
	1

We should not encourage people to throw	
their money away on a 'mug's game' when	
the high streets need more consumer	
spending to keep alive. Less money thrown	
away means more disposable income for the	
other shops.	1
Too many problems with money laundering.	
Also pressure to open late into the night.	
	1
Ni need unless it is legally required	1
If the right situation arose, the Council	-
should not tie the hands of the future	
Councillors.	1
Not appropriate to the main demographic of	-
this borough which is largely family	
residential.	1
This prevents an application for a casino	1
being awarded by default, also underlines	
the Borough's regular and positive	
consideration of this policy and its concerns	
for maintaining Richmond as a primarily	
residential area.	
	1
I support this approach	1
A casino would find it difficult to be	
successful	1
Can't see any benefit but many drawbacks	
such as attracting further poor behaviour	
and noise nuisance late st night for residents	
	1
Casinos:	
<ul> <li>increase the risk of gambling addiction.</li> </ul>	
<ul> <li>may lead to disturbance from late-night</li> </ul>	
traffic.	
<ul> <li>may lead to drink-related disorder.</li> </ul>	1
The borough's two main night time centres	
Twickenham and Richmond town centres	
are not suited to the enhancement of the	
night time economy that a casino would	
attract, including inward travel from other	
boroughs .	1
Unless the legislation is amended to permit	
further casino licences there would be no	
reason to pass another resolution, as it will	
remain in effect until rescinded.	
	1
	*

There is no need for a casino in the borough	
as there are plenty of casinos within easy	
traveling distance in central London.	
	1
No - any change should go to a vote.	
Shouldn't vote on retaining a policy - unless	
it is time limited.	1
Borough is an inappropriate place for	
casino. There is easy access to London for	
this.	
Possibly there are casinos in neighbouring	
boroughs. There are plenty of other	
entertainment facilities. I don't think the	
Borough has any responsibility to provide all	
forms of entertainment for its residents. I	
don't see how a casino would be of general	
economic use to the borough.	
	1
Will lead to criminal activity and destruct	
lives.	1
Continuation of the status quo	1
It is bad enough that there are a number of	
gambling outlets in our high streets (Whitton	
has at least 3 or 4 in it's small High St) but	
letting in Casinos will have a further	
detrimental effect on residents who cannot	
afford to gamble but still do so. It will only	
encourage more gambling addictions due to	
the nature of casinos (serving alcohol,	
entertainments and other 'inducements'	
which casino's offer, such as free drinks,	
'free' bets, in some cases free	
accommodation - especially for those who	
spend enough - and even the sexual allure of	
scantily-clad, attractive 'hostesses'.	
Please keep our borough 'casino-free'!	
	1
It sends a good message for the borough.	
Central London has plenty of accessible	
casinos.	1
Would attract late night traffic and possibly	
criminal activities	1

Casinos are one of the causes of the public	
health emergency which gambling must be	
treated as - the residents of Richmond do	
not want casinos, don't want to expose	
vulnerable people to them. They do want	
however to hold gambling companies to	
account with a levy placed on their profits to	
mitigate/treat people harmed by gambling.	
	1
The Borough does not need a casino for	
regeneration, and entertainment benefits to	
residents are outweighed by the risks to the	
Gambling Act's Objectives. There is no	
suitable location.	
	1

# Are you aware of any problems in your area that are directly related to gambling premises?

This single response question was answered by 34 respondents.

Response	Number of Respondents	Percentage of Respondents
Yes	6	17.6%
No	28	82.4%

## If yes, please state:

This open response (Free text) question was answered by 7 respondents.

Response	Number of Respondents
However, there is a recognition of the ease	
with which an addiction can take hold and so	
no further licences should be given at any	
level so as to prevent further gambling and	
its possible associated problems.	
	1
Rubbish caused by old betting slips and	
cigarette ends in Teddington High Street.	
Unattractive window display compared to	
other shops in Teddington High Street.	
	1

In Whitton High Street we have drug addicts	
that beg in the high street (outside the	
supermarkets) then go into the bookmakers	
to place bets. This has been discussed	
several times at the police liaison meetings.	
Places like Whitton are very close to very	
poor parts of Hounslow and the council's	
statement in 3.4 that the area is affluent is	
very far from the truth for large parts of the	
borough.	
	1
There is a hostel for ex-offenders where	
their crimes could have been gambling	
related	1
Seeing increased people seeking help at	
addiction groups run within my local	
community.	1
Drunks and homeless people hanging around	
and obstructing the pavement outside the	
betting shop next to Tesco at The Quadrant,	
Richmond.	1
Addicted gamblers whose families suffer.	
One can see the same people, some of	
whom are out of work, on the premises of	
betting shops daily.	1

What, if any, additional measures should be considered in order to protect children from harm or being

This open response (free text) question was answered by 23 respondents.

Response	Number of Respondents
Don't licence gambling shops or casinos -	
that's the most direct and positive way of	
protecting children from the harm of	
gambling poverty in the family	1
Ensure the continued monitoring of all	
existing licences to check that all conditions	
are being enforced.	1
Locations should not be close to areas used	
by children, especially true if slot machine	
arcades on the way to/from school and not	
properly policed	1

No betting advertising to be permitted on any publications issued by the Council.	
Is it possible to ban the use of phone	
gambling apps on Council premises?	1
Keep casinos and arcades to a minimum or	
ideally none in the borough. Do not	
glamourise it.	1
If the gambling shop is near schools - then maybe the windows should be obscured up to 1.3 meters so young children cannot see inside and greater control of the content of adverts in the windows - which tend to be bright colours and eye-catching.	1
EDUCATION. Gambling is taught in very few schools. It is a bit like Sex Education in the past.	
As a retired professional poker player, I am	
greatly in favour of teaching children about	
gambling. The best age is unclear to me. My	
4 basic rules, plus a definition are very clear to me.	
I would be willing to talk on the subject to	
perhaps 14, 16, 18 year olds. My guess is	
that, perhaps 30% fewer youngsters who	
attended such a course, would become	
'problem' gamblers.	1
Every effort should be made to educate	-
children of the addictive nature of gambling	
and how other addictive behaviours can	
follow	1
Possibly resisted age 21 years & over. CCTV	
to make sure clientele appropriate age . Not	
to be situated near schools & playgrounds .	1
No advertising boards be allowed for	
gambling premises as it is impossible to	
prevent children seeing them	1

Education.	
I would be happy to conduct a short course	
for people aged perhaps 15-18.	
I am a retired professional poker player and	
author of 7 books on the subject.	
This would apply whether or not a casino	
was erected in our borough. I feel I cold have	
a great deal to contribute, such that people	
who attanded such a course, would become	
perhaps 20-30% less likely to become	
degenerate gamblers.	1
More regulation of advertising of gambling.	
Help to enable parents, teachers, youth	
workers, etc, to better recognise signs of and	
deal with children becoming involved in	
gambling.	1
School education forf children concerning	
protection from on line exploitation. I	
personally know of young children being	
targeted by the gambling industry who have	
become addicted to illicit on line gambling.	
Stricter controls for under age access are	
needed.	1
Co-location of licensed premises and school	
premises, the new one should not be given	
permission if the other is already located in	
the area.	1
Spot checks by Council officers on gambling	
premises to ensure that age limits are	
enforced.	1
Reduce the availability of scratchcard etc in	
newsagents	1
The existing measures seem appropriate.	1
Outlaw gambling on mobile phones	1

I don't have any easy answers to this. Maybe	
that most benefits should be paid 'in kind' -	
to landlords etc and ensuring that some	
benefits are paid in food stamps and	
children's clothing grants, for school uniform	
etc, if this is not already the case.	
I also strongly believe that, like cigarettes,	
both alcohol and gambling sites should be	
banned from advertising on TV - however	
this is a national issue rather than a local	
one.	1
Proper checking of IDs for access and	
gambling.	1
No gambling premises near schools.	
Restriction of the number of betting shops in	
the borough.	1
Ban advertising. Ensure there is close	
monitoring of gambling premises including	
slot machines, and increase rates on existing	
premises. Refuse permission to new	
proposals for gambling premises.	1
Richmond town does attract large numbers	
of children and young people who come to	
the town to meet and socialise in the open	
spaces and coffee and food led premises.	
While we are not making a specific	
recommendation for Policy amendment we	
provide this comment as evidence of the	
provide this comment as evidence of the need for the Policy and Regulation of	

If you have any additional comments you would like to make about the Statement of Principles under the Gaming Act 2005, please use the space below. Please refer to specific paragraphs.

This open response (free text) question was answered by 6 respondents.

Response

Number of Respondents

Gambling ruins lives every day. It is a very profitable business and the companies involved have the resources to lobby Councils to reduce restrictions on gambling. Please stand up for those who cannot help themselves . Please do not reduce those restrictions. 3.3 There are references to villages - the new administration has defined the area as a group of towns - see the intro to the new Local Plan 3.4 The Council is again shooting itself in the foot by making out the main character of the borough is that of affluence- you may have to be affluent to buy a house in the borough today as a first-time buyer- but most residents brought their houses when prices were considerably lower. The council should instead refer to national statistics on household income - may be also presented as a heat map of incomes per ward - as this will help the council greatly if a refusal is challenged in a court of law - as this will highlight some areas are unsuitable for extra betting shops.	11
Everybody gambles. Whether it is 'investing' on the stock market; betting on a horse race; or crossing the road. Failure to educate properly is the key.	1
Section 4.2 gives a list of bodies consulted. I would like to know specifically who has been consulted under the faith group sector. Ban credit betting.	1

 Richmond Town is frequented on the streets and open spaces, as in other towns, by homeless and vulnerable people and has two centres providing support and care for such people. It is important to recognise these situations when considering gambling facilities in the town. While we are not making a specific recommendation for Policy amendment we provide this comment as evidence of the need for the Policy and Regulation of gambling.
 The Policy does deal specifically with vessels. Richmond is unique in the length of

river, the Thames, in the borough. Occasionally there have been issues under the Alcohol Licensing Act where residents have had difficulty making representations in respect of vessels that pass their homes but which are registered in another borough (e.g. Kingston). We are not aware of any issue of this nature regarding gambling but we suggest the Licensing Authority ensure this issue of representation is forestalled either through provisions in the Gambling Policy or other means.

1