

APPENDIX 2.



Representation by an Interested Party Gambling Act 2005

Note: Please be aware that your completed form may be viewed by the Applicant or by a representative of the Applicant. It may also form part of a public report for a sub-committee hearing.

Representations may be made at any time during a period of 28 consecutive days - starting on the day after the application was given to the Licensing Authority.

To accept a representation from an Interested Party the Licensing Authority must take the view that the person:

- **lives sufficiently close to the premises to be likely to be affected by the authorised activities**
- **has business interests that might be affected by the authorised activities**
- **represents persons in either of these two groups. Licensing authorities will need to have regard to anything an interested party says about their status to make representations**

Representations are only relevant to an application if they relate to at least one of the three **Licensing Objectives** listed below:

- **to prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime**
- **to make sure gambling is conducted in a fair and open way**
- **to protect children and other vulnerable persons from being harmed or exploited by gambling**

What is your interest?	I live sufficiently close <input type="checkbox"/> I have business interests <input checked="" type="checkbox"/> I represent one of the above <input type="checkbox"/>
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Name:	Claire Hill, Economic Growth Team - West Lindsey District
Address:	Guildhall, Marshalls Yard, Gainsborough
Postcode:	DN21 2NA
Phone Number:	01427 676632
Email Address:	Growth@west-lindsey.gov.uk

Please provide details of the application to which your representation refers:

Name of Applicant:	Done Brothers (Cash Betting) Limited t/a Betfred
Address of Premises:	11 Market Place, Gainsborough, DN21 2BP
Application Details:	Application for betting premises licence

Please indicate which of the Licensing Objectives your representation refers to by ticking the relevant box/es, then give details of your representation in the box below.

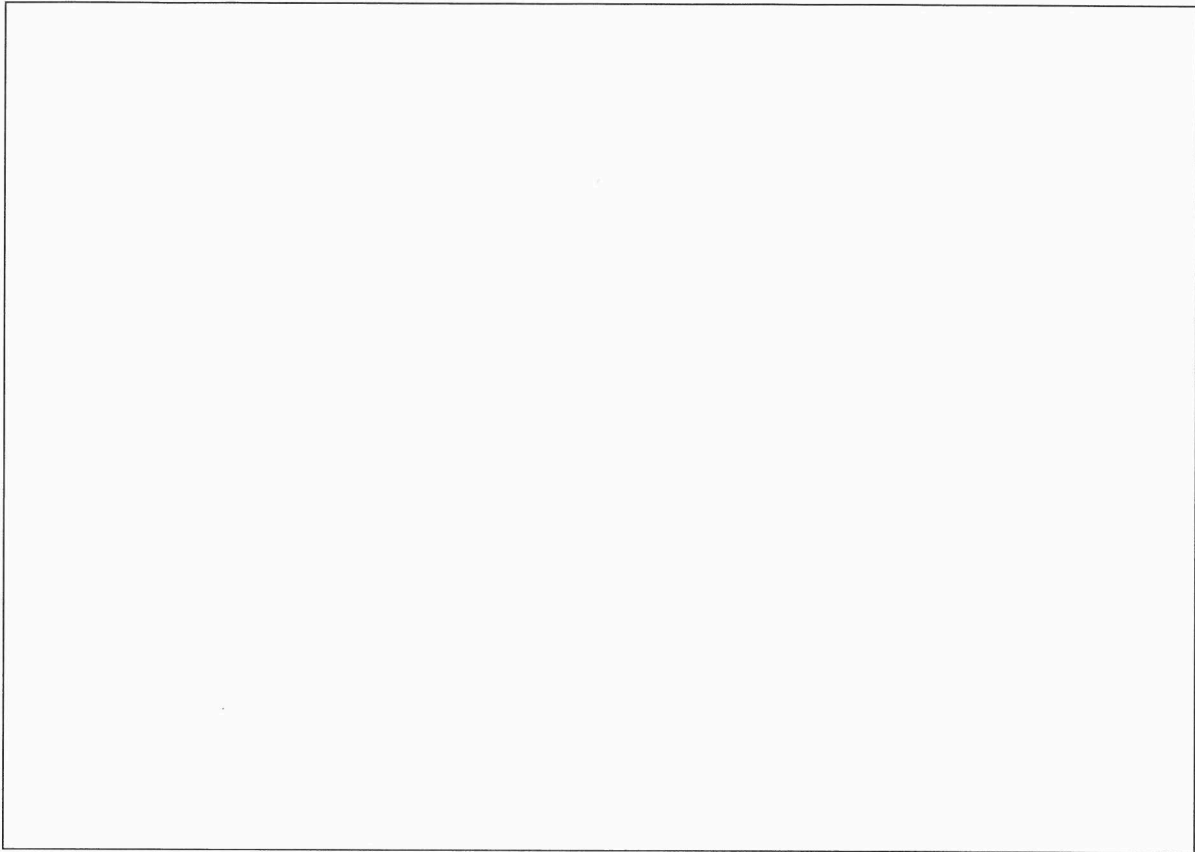
- to prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- to make sure gambling is conducted in a fair and open way
- to protect children and other vulnerable persons from being harmed or exploited by gambling

Details of representation
See attached document.

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If possible, please suggest alterations to the application that would resolve the problem(s) mentioned above, again paying attention to the licensing objectives:

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Once the Licensing Team has received this form you will receive a written acknowledgment and you may be contacted to discuss the issue prior to any referral to a sub-committee hearing.

Please tick this box if you consent to any notice of any hearing being sent to you to the email address provided on page 1.

(Please note if any notice is sent to you by electronic means, you will also receive confirmation of the same by post)

Please tick this box if you do not intend to attend or be represented at any hearing

If you wish to withdraw any representations you may do so in writing no later than 24 hours before any hearing, or otherwise orally at the hearing.

Signed: **Claire Hill**
Digitally signed by Claire Hill
DN: cn=Claire Hill, c=GB, o=West
Lindsey District Council, ou=Projects
and Growth, email=claire.hill@west-
lindsey.gov.uk
Date: 2023.02.22 10:13:38

Dated: **22.02.2023**

Print Name: **Claire Hill**

Please return this form to licensing@west-lindsey.gov.uk or:

Licensing
West Lindsey District Council
Marshall's Yard
Gainsborough
Lincolnshire
DN21 2NA

Privacy Notice: We will use the information you give us to (a) do the tasks we need to do for the job shown in the title of this form (b) carry out any of our official business (c) stop fraud or crime. To find out more about why we need your information, what we do with it and how to contact us if you have any concerns or questions please read our privacy notice. This can be viewed using the following link: www.west-lindsey.gov.uk/licensing-privacy/

This authority is under a duty to protect the public funds it administers, and to this end may use the information you have provided on this form for the prevention and detection of fraud. It may also share this information with other bodies responsible for auditing or administering public funds for these purposes.

For further information, see www.west-lindsey.gov.uk/fairprocessingnotice or contact the finance department on 01427 676560 or FinanceTeam@west-lindsey.gov.uk

Details of representation

We consider the Economic Growth service area of West Lindsey District Council (WLDC) to be defined as an Interested Party for this application as we hold responsibility for the Council's significant business interests in properties directly adjacent to and close to the application site.

This application is opposed because it is not reasonably consistent with the licensing objectives of protecting children and other vulnerable persons from being harmed or exploited by gambling and preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

WLDC are the owners of:

- 5 -7 Market Place comprising of ground floor commercial premises and 3 residential apartments above. This site is nearing completion following extensive refurbishment and will shortly be brought to market. The bulk of the residential properties are 2-bedroom properties and could therefore be occupied by families.
- Lindsey Centre (13 - 19 Market Place), which has full planning permission for the development of a 4-screen cinema, retail and restaurant complex. This site is currently being cleared to allow development to commence in June 2023. This site is next door to 11 Market Place.

Site context:

Gainsborough's Market Place is a critical site at the heart of our town centre regeneration area. The area is an essential component of the Council's Thriving Gainsborough 2024 programme which brings together some £18m of investment from a variety of sources including WLDC, private enterprise, Central Government's Levelling Up Fund and builds on previous National Lottery Heritage Funding secured to deliver heritage led regeneration to the Market Place and surrounding streets. Improving the economic performance of Gainsborough's town centre is a strategic objective within WLDC's Corporate Plan.

Recognising existing social and economic challenges and the seismic shift in consumer habits that have made the traditional all retail town centre environment unviable, Thriving Gainsborough 2024 alongside the existing heritage regeneration seeks to revive the Market Place by adopting best practice and actively redeveloping the space as a multi-use leisure / entertainment / retail space that will encourage a broader diversity of footfall. The key element in driving this change is the cinema complex which will be developed directly adjacent to the application site. This will be a key contributor to an active town centre. A central aim for this development is to increase leisure use and bring more families and children into the Market Place.

Representation in relation to Licensing Objective 'to protect children and other vulnerable persons from being harmed or exploited by gambling'

Geofutures 2015 research to exploring area-based vulnerability to gambling-related harm sought to understand who may be more susceptible to harm, this included those with constrained economic circumstances or living in deprived areas. The Budd Report 2001 identified low income groups and those most disadvantaged and marginalised by economic change as potentially vulnerable. Gainsborough's core Town Centre including the application site forms part of the South West Ward, an

area with multiple indices of severe deprivation. Given the economic, social and health position affecting this ward it is feasible to consider the wider locality vulnerable as evidenced below.

Child Poverty in West Lindsey – December 2018 (based on 2013 wards)				
Ward	% of children in poverty (before housing costs)	% change from December 2017	% of children in poverty (after housing costs)	% change from December 2017
Bardney	9.3%	-4.04%	19.5%	-1.85%
Caistor	11.4%	-4.59%	24.0%	-1.11%
Cherry Willingham	9.3%	-2.58%	19.5%	+0.42%
Dunholme	9.2%	-1.69%	20.5%	-2.92%
Fiskerton	9.3%	+2.32%	19.5%	+8.06%
Gainsborough East	30.1%	+2.99%	36.4%	-4.81%
Gainsborough North	23.7%	-1.22%	29.0%	-8.97%
Gainsborough South-West	28.2%	+4.46%	30.7%	-5.5%
Hemswell	13.9%	-3.76%	24.8%	-2.91%
Kelsey	11.4%	-6.6%	24.0%	-3.95%
Lea	9.2%	+1.45%	22.4%	+9.71%
Market Rasen	15.2%	-6.69%	26.0%	-7.48%
Middle Rasen	15.2%	+3.37%	26.0%	+7.04%
Nettleham	7.3%	+0.43%	13.6%	+2.32%
Saxilby	10.4%	-2.86%	22.3%	+1.17%
Scampton	12.0%	+3.34%	23.4%	+9.28%
Scotter	11.6%	+1.72%	24.5%	+8.47%
Stow	9.2%	+0.56%	22.4%	+8.37%
Sudbrooke	7.3%	+2.54%	13.6%	+5.67%
Thonock	11.6%	-4.85%	24.5%	-1.3%
Torksey	9.2%	-5.06%	22.4%	-0.24%
Waddingham and Spital	13.9%	+3.12%	24.8%	+7.42%

Source – National Children’s Bureau

Fuel Poverty in West Lindsey (2018)			
Ward	Number of households in fuel poverty	% of households in fuel poverty	% change from 2016
Bardney	147	15.1%	+20.5%
Caistor and Yarborough	371	14.4%	+ 20.85%
Cherry Willingham	308	10.4%	+ 3.7%
Dunholme and Welton	332	9.5%	+ 13.7%
Gainsborough East	359	11.3%	- 15.1%
Gainsborough North	428	13.5%	- 15.8%
Gainsborough South-West	390	16.5%	- 11.8%
Hemswell	214	19.2%	+ 28.1%
Kelsey	158	13.6%	+ 17.9%
Lea	141	14.3%	+ 18.5%
Market Rasen	545	13.8%	+ 29.5%
Nettleham	194	8.8%	- 11.0%
Saxilby	291	12.1%	+ 9.8%
Scampton	192	14.6%	+ 23.1%
Scotter	432	13.0%	+ 13.68%
Stow	137	13.5%	+ 18.1%
Sudbrooke	106	9.5%	+ 16.5%
Torksey	143	10.8%	+ 31.2%
Waddingham and Spital	169	15.3%	+ 18.2%
Wold View	150	14.6%	+ 23.9%
West Lindsey	5,207	12.8%	+ 7.78%

In-Work Poverty

The real living wage is independently calculated every year by the Real Living Wage Foundation. It is higher than the national living wage (£8.72 per hour) but calculated independently to determine the minimum amount of money a worker needs to be paid based on the actual cost of living in the UK. The real living wage is currently defined as £9.30 per hour.

Figures from the Office for National Statistics show that, as of May 2019, 7,000 workers in West Lindsey earned below the real living wage, which equates to 30.5% of the working population in the district. Of this number, part-time workers are more affected with 5,000 of this cohort taking home less than the Living Wage; 71.4% of the overall figure.

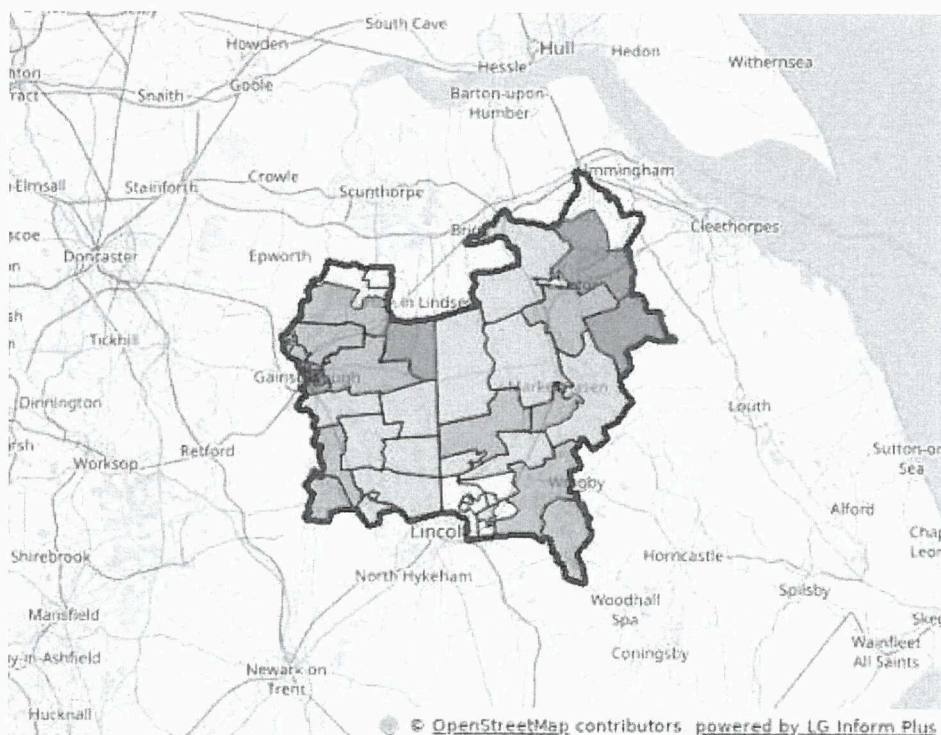
Of all full-time jobs in the district, 22% are paid below the real living wage.

Deprivation

The Indices of Multiple Deprivation (IMD) were last updated in 2019. The IMD uses a series of indicators based on crime to measure deprivation (which is different to poverty) down to district and lower super output area (LSOA) level.

Overall, West Lindsey ranks 146th most deprived of 317 local authorities, a decline of one place since 2015 and placing the district slightly above the median.

The highest levels of deprivation can be found within the Gainsborough East and Gainsborough South-West wards while the least deprived areas can be found within Dunholme and Welton. The following map shows the overall rank broken down by LSOA with areas marked in light blue experiencing the lowest levels of deprivation graduating to dark blue for areas with the highest deprivation.



IMD: Overall - score (2019)

- $\geq 25.110 \leq 81.300$
- $\geq 16.668 < 25.110$
- $\geq 10.040 < 16.668$
- $\geq 4.047 < 10.040$

Tenure

According to the Building Research Establishment (BRE), across the district 69% of dwellings are owner occupied, with 19% privately rented and 12% social rented.

Rates of home ownership have fallen 3.6% in relative terms across West Lindsey since 2011, while the private rented sector has grown by 5.3%.

The most drastic change has occurred within Gainsborough South-West, where home ownership rates fell by 10.97% and private renting rates increased by 10.43%.

Source WLDC State of the District report 2020

Multiple research studies have established a direct link between poor socio-economic status and gambling harm. For example:

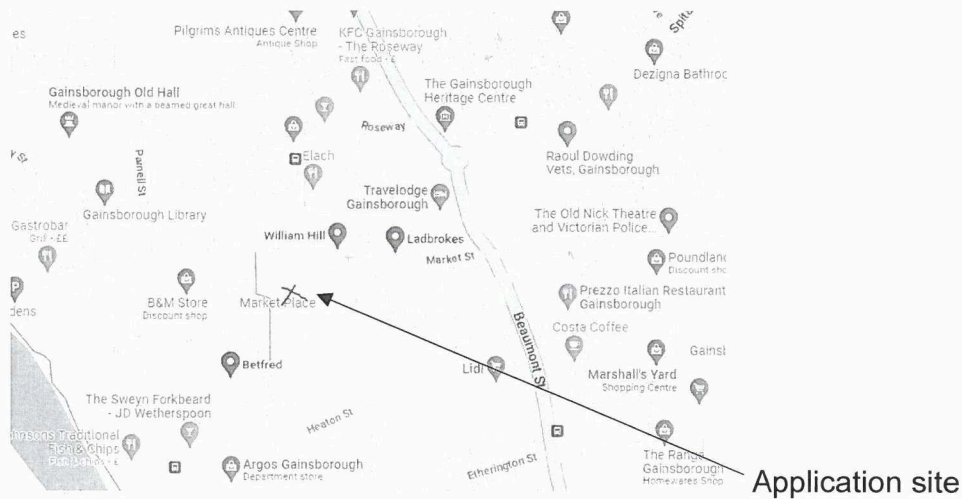
- Poor socioeconomic status predicts increased problem gambling harm (Dowling et al., 2017).
- Lower socioeconomic status is linked to gambling twice a week and problem gambling (Barnes et al., 2017).
- People in lower income brackets spend a larger percentage of their income on gambling than those in higher income brackets (Atlas, N.D.).
- Risk of gambling harm increases when a person spends more than 1% of their family income on gambling (Currie et al., 2006).
- People living in the poorest neighbourhoods have 1.28 times the odds of developing a gambling problem compared to those who live in wealthier neighbourhoods. Problem gambling is twice as high among those with low socioeconomic status as for those with higher status. Those who live in the poorest neighbourhoods and have low socioeconomic status are at higher risk for problem gambling (Barnes et al., 2013).

The new adjacent leisure complex on the site of the Lindsey Centre will change the characteristics of those visiting the town centre with emphasis on creating a family destination within the market place. Therefore the volume of and dwell time of children and young adults (who are recognised to be at particular risk for gambling harms) within the direct vicinity of the proposed licensed premises will substantially increase.

Further, the open area of the Market Place is utilised as an events space - hosting free events aimed to engage and offer opportunity to families. Activations such as the Merry Olde Market, Illuminate, Christmas Lights Festival etc are all part of a wider programme being developed, all aimed at families and centred on the Market Place.

Movement from the existing Betfred premises to the new location effectively creates a cluster of betting shops with the existing William Hill and Ladbrokes premises on the adjacent Market Street. In the years since the Gambling Act was implemented, there have been some noticeable shifts in how gambling premises are distributed. There is rising concern about how some premises are 'clustering' in certain areas (Harman, 2011).

As a result, we consider that the location of Betfred in the proposed new location will create or risk cumulative impact, with three betting offices being co-located within a short distance of each other, as shown below.



Gainsborough Town Centre already sits above the average for the East Midlands in terms of supply of betting premises (LDC May 2022). This is exacerbated by locating all three betting offices in close proximity to each other in the midst of an area targeted for family use.

Leisure supply					
Business type over- or under-supply in Gainsborough (town centre) versus regional average.					
Gainsborough (town centre)			East Midlands		
Business Type	Live	% of total leisure businesses	Live	% of total leisure businesses	Variance
Bookmakers	3	8.57%	370	3.63%	4.9%

Representation in relation to Licensing Objective 'to prevent gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime'

Crime rates continue to increase in West Lindsey (State of District Report 2020).

Poor reputation and fear of crime has contributed to market failure within Gainsborough's town centre.

The Local Super Output Area in which the application site falls lies within the top decile for crime nationally.

The applicant itself refers to Gainsborough's poor comparison against the wider Lincolnshire's crime rate. It is noted that the existing premises have been subject to robbery previously. The applicant has not produced its incident log for the premises or dealt with the crime record in its local area risk assessment: comment is reserved as to further incidents of crime and disorder in or outside the premises.

Whilst the applicant has sought to mitigate the risk to their own premises, it should be recognised that allowing the licensing of a premises in this location is encouraging a use which could attract criminal activity into the heart of the Market Place. Further, the cumulative impact of this in close proximity to William Hill and Ladbrokes has potential to cause significant harm both to the crime and disorder objective and to the regeneration objectives of the Levelling Up Programme.

Low level disorder and ASB frequently lead to damage and vandalism within the Market Place - a premises with a more active frontage and visibility into the Market Place would assist in deterring these activities.

Overall Crime

Crime rates continue to increase in West Lindsey and Lincolnshire Police recorded the overall crime rate for the district as 55.67 per 1,000 of the population in 2018, an increase from 50.89 in 2017; 45.7 per 1,000 in 2016; 40.0 during 2015 and 39.5 in 2014.

The district has the third lowest crime rate in the county. Overall, there were 5,737 recorded crimes in the 12 months to December 2019, an increase of 778 on 2018. Lincolnshire Police data shows that West Lindsey has the second lowest crime rate in the county which has an average crime rate of 79 per 1,000.

Types of crime

Amongst individual crimes, major types include theft offences and burglary, criminal damage and arson, shoplifting and violent crime.

The table below shows a breakdown of crime by type. With the exception of bicycle theft and homicide, all categories of crime have experienced an increase over the last twelve months with stalking and harassment offences seeing the biggest increase, up from 26 in 2018 to 407 in 2019.

Category	Dec 2015	Dec 2016	Dec 2017	Dec 2018	Dec 2019
All other theft offences	594	566	703	695	710
Bicycle theft	45	55	77	50	45
Criminal damage and arson	568	704	781	810	832
Death and serious injury caused by illegal driving	0	0	1	1	3
Domestic burglary	269	322	507	471	489
Drug offences	107	101	135	120	131
Homicide	0	2	0	1	1
Miscellaneous crimes against society	65	63	88	107	115
Non-domestic burglary	519	553	316	176	191
Possession of weapons offences	32	29	29	50	62
Public order offences	103	77	102	265	304
Robbery	34	16	32	26	34
Sex offences	95	136	147	212	237
Shoplifting	367	364	584	437	485
Stalking and harassment offences	50	94	98	26	407
Theft from the person	16	19	16	16	19
Vehicle offences	333	532	465	328	342
Violence with injury	332	386	433	562	607
Violence without injury	172	232	256	606	723
West Lindsey Total	3,369	4,251	4,770	4,959	5,737

Source: Office for National Statistics

For all of these reasons, the licensing authority will be asked to refuse this application.