

Appendix E

Summary of responses and proposed amendments to Statement of Gambling Policy

Consultee	Observations	Comment / Action Taken	Amendments to Gambling Policy
Dover Town Council	Dover Town Council have scrutinized the draft Statement of Principles under the Gambling Act 2005 and will exercise its responsibilities under the Act, acting as an Interested Party if any person who lives close to a premises licensed under the Act or is likely to be affected by the operation of those premises, or if such persons have business interests that are or might be affected by the authorized activities and they ask the council to represent them (Section 158, Gambling Act 2005).	Noted.	No change proposed.
Cllr B Gardner	Somewhere in the policy there must be a section on the Cummulative Impact of too many Betting Shops and Adult Amusement Centres in a small area, that then excludes ordinary shops from being allowed to open. As a Councillor who has served on the Planning, the Licensing and the Regulatory Committees for the last 5 years I understand that there is a crossover between these 3 areas, and therefore some matters fall between both pillars, in which case it is surely best to cover the problem with a policy twice rather than not at all.	Section 153 of the Gambling Act specifically requires the council to apply the 'aim to permit' principle. Therefore whilst our statement of policy identifies the factors to be considered when determining an application, guidance states that it should be clear that each application will be decided on its merits.	No change proposed.

Cllr B Gardner	<p>While there has to be a line drawn between the 2 areas, planning and licensing, there is a need for both departments to talk to each other, a perfect example occurred only last week at the Regulatory Committee when the applicant said that he had been in discussions for weeks with the planning department about his application, and that after this consultation he had reduced the application by 30% but the papers in front of us were the old ones because the applicant assumed that he was taking to DDC about the application and that he believed that the new agreed sized application was the relevant one, but no officer in planning had forwarded the new plans and application to licensing. He thought that, and thought total wrongly, that he was dealing with DDC, and that officers spoke to each other. This is the same as the situation between planning and building control, and between planning and enforcement.</p>	<p>Planning and Licensing regimes are separate functions of the council and must be dealt with independently of each other.</p>	
Cllr B Gardner	<p>Betting shops are currently allowed up to a maximum of 4 B3 type gaming machines in each shop, and all have the maximum number of 4, and these are now taking more money than the shop takes in bets on dogs and horses, indeed in a lot of shops each of the 4 machines can take more money each day than the tills take in bets. For this reason more and more betting shops are opening, because they want more and more of these B3 machines, and the same betting shop chain will open more shops near to its own existing shops to be able to increase its daily take.</p>	<p>Section 153 of the Gambling Act specifically requires the council to apply the 'aim to permit' principle. Therefore whilst our statement of policy identifies the factors to be considered when determining an application, guidance states that it should be clear that each application will be decided on its merits.</p>	

	<p>In Deal there are 2 betting shops and 2 adult amusements centres in a small area of the town centre, and in fact they are all within an area of 200 metres. The same is true in the centre of Dover, there are 4 betting shops in Pencester Road and Worthington Street and 2 adult amusement centres close by. Without some reasonable limit on the numbers within an area in the policy then areas of the district could become wall to wall gambling establishments as per Las Vegas.</p> <p>It is correct to say that Deal High St lost one betting shop two years ago, but this was because it was a total dump and the punters stopped using it, because the other 2 betting shops regularly updated their machines with new games and the Tote shop didn't. Also the other 2 shops regularly improved their facilities for the punters where as the Tote shop never did, and indeed the toilets in that shop were so bad and stank so much that it would have been more hygienic to have been peeing into an open sewer, in fact it would have been understood if one thought that one actually was. The shop closed due to market forces, in that the other shops were willing to spend money on their premises getting the latest machines and games, where as the Tote nationally was in serious trouble with its finances and could not keep up the opposition.</p> <p>There must be a limit on the number of betting shops and adult amusement centres, because otherwise they can by the nature of their</p>	
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	<p>business. Their turnover and their profit margins they can easily afford to pay much higher rentals than other ordinary shops, and it is the ordinary shops that are needed in a town centre and in the High St to keep it vibrant and a place worth visiting by not only the people who live in the town and surrounding area, but also the tourists that Deal and Dover go out of their way to attract.</p>		
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