

SPEAKERS PANEL (LIQUOR LICENSING)

Day: Thursday
Date: 20 August 2020
Time: 10.00 am
Place: Zoom Meeting

Item No.	AGENDA	Page No
1	APOLOGIES FOR ABSENCE To receive any apologies for absence.	
2	DECLARATIONS OF INTEREST To receive any declarations of interest.	
3	APPLICATION FOR A NEW GAMBLING PREMISES LICENCE - CASHINO GAMING LIMITED TRADING AS MERKUR SLOTS, UNIT 8 & 9, 17 QUEENS WALK, DROYLSDEN, M43 7AD To consider the attached application for a new Gambling Premises Licence.	1 - 20

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Agenda Item 3

Report to:	SPEAKERS PANEL (LIQUOR LICENSING)
Date:	20 August 2020
Reporting Officer:	Emma Varnam – Assistant Director Operations and Neighbourhoods
Subject:	APPLICATION FOR A NEW GAMBLING PREMISES LICENCE – CASHINO GAMING LIMITED TRADING AS MERKUR SLOTS, UNIT 8 & 9, 17 QUEENS WALK, DROYLSDEN, M43 7AD
Report Summary:	Members are requested to determine the application.
Recommendations:	<p>Having regard to the application and the relevant representations, Members are invited to take such steps (if any) as it considers appropriate for the promotion of the licensing objectives. The steps available are:-</p> <ul style="list-style-type: none">a) Grant the licenceb) Refuse the licence applicationc) Grant the licence with conditions
Corporate Plan:	Living Well – Improve satisfaction with local community
Policy Implications:	<p>Members are provided with policy guidelines to assist in the decision making process.</p> <p>In determining the application the Panel must have due regard to the Gambling Commission Guidance to Local Authorities (5th Edition, September 2015) issued pursuant to s25(1) of the Gambling Act 2005. In addition, the Panel must, in the exercise of its decision making powers, apply the principles set out in the Council's Statement of Principles 2019-2022 Gambling Act 2005 (prepared pursuant to s349 Gambling Act 2005).</p>
Financial Implications: (Authorised by the statutory Section 151 Officer & Chief Finance Officer)	There are limited financial implications for the Council, as detailed in the report, however, any legal challenge to a policy decision may potentially incur costs.
Legal Implications: (Authorised by the Borough Solicitor)	Any decision to refuse the licence or grant the licence with conditions can be challenged by way of appeal (in the first instance) to the local Magistrates Court.
Risk Management:	Failure to give full consideration to the determination of licensing issues has the potential to impact on public safety.
Access to Information:	The author of the report is Mike Robinson, Regulatory Services Manager (Licensing)
Background Information:	The background papers relating to this report can be inspected by contacting Mike Robinson



Telephone: 0161 342 4122



e-mail: mike.robinson@tameside.gov.uk

1. INTRODUCTION

- 1.1 Section 162(1) of the Gambling Act 2005 states that the Authority must hold a hearing if:-
- a) an interested party or responsible authority has made (and not withdrawn) representations about the application under section 161;
 - b) the authority propose to attach a condition to the licence under section 169(1)(a); or
 - c) the authority propose to exclude under section 169(1)(b) a condition that would otherwise be attached to the licence under section 168.
- 1.2 Section 163(1) of the Gambling Act 2005 states that on considering an application for a premises licence a licensing authority shall:-
- a) Grant it, or
 - b) Reject it
- 1.3 Section 169 of the Gambling Act 2005 states that where a licensing authority issues a premises licence they may:-
- a) Attach a condition to the licence.
 - b) Exclude a condition that would otherwise be attached to the licence by virtue of section 168.
 - c) A condition attached to the licence under subsection (1)(a) may, in particular, address a matter by a condition excluded under subsection (1)(b).
 - d) A condition attached to the licence under subsection (1)(a) may apply in relation to the premises generally or only in relation to a specified part of the premises.
 - e) A licensing authority may not attach a condition to a premises licence, which prevents compliance with a condition of the operating licence, which authorises the holder to carry out the activity in respect of which the premises licence is granted.

2. REPORT

- 2.1 On 23 June 2020 a Bingo Premises application was received from Cashino Gaming Limited trading as Merkur Slots at Unit 8&9, 17 Greenside Lane, Droylsden, Tameside, M43 7YY. A copy of this application is attached at **Appendix 1**.
- 2.2 There are three licensing objectives under the Gambling Act 2005:-
- 1) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime;
 - 2) Ensuring that gambling is conducted in a fair and open way; and
 - 3) Protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 2.3 Under section 153 Gambling Act 2005 the Licensing Authority shall aim to permit the use of premises for gambling in so far as the authority thinks it:-
- a) In accordance with any relevant codes of practice issued by the Gambling Commission.
 - b) In accordance with guidance issued by the Gambling Commission.
 - c) Reasonably consistent with the licensing objectives.
 - d) In accordance with the Councils Statement of Policy.
- 2.4 On 24 June 2020 a planning application was submitted to change the use of the Unit 8&9, 17 Queens Walk, Droylsden to an adult gaming centre. This application has not yet been

validated. This matter will be dealt with under the relevant planning and building control regulations and will not form part of the consideration of the premises licence.

3. REPRESENTATIONS AND EVIDENCE SUBMITTED

- 3.1 A representation has been received from Simon Watts, Specialist Registrar Public Health on behalf of Public Health. This representation is attached at **Appendix 2**.
- 3.2 A representation has been received from 3 Councillors: Barrie Holland, Ann Holland and Laura Boyle. This representation is attached at **Appendix 3**.
- 3.3 The Licensing Department received 2 representations from members of the public. These letters are attached at **Appendix 4**.

4. CONCLUSION AND OPTIONS FOR THE PANEL

- 4.1 Panel are requested to consider the evidence and decide what (if any) steps to take as it considers appropriate for the promotion of the gambling objectives. The options available to the Panel are set out at the front of the report.

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**Application for a premises licence
under the Gambling Act 2005 (standard form)**

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is—

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

Part 1 – Type of premises licence applied for

Regional Casino

Large Casino

Small Casino

Bingo

Adult Gaming Centre

Family Entertainment Centre

Betting (Track)

Betting (Other)

Do you hold a provisional statement in respect of the premises? Yes No

If the answer is “yes”, please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

Part 2 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A

Individual applicant

1. Title: Mr Mrs Miss Ms Dr Other (please specify)

2. Surname: _____ Other name(s): _____

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]

3. Applicant's address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant's operating licence (as set out in the operating licence):

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person.

[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked “Details of further applicants”.]

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation: **Cashino Gaming Limited**

7. The applicant's registered or principal address:

**Seebeck House
1A Seebeck Place
Milton Keynes
Postcode: MK5 8FR**

8(a) The number of the applicant's operating licence (as given in the operating licence):
000-003266-N-103444

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: **N/A**

9. Tick the box if the application is being made by more than one organisation.

[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known): **Merkur Slots**

11. Address of the premises (or, if none, give a description of the premises and their location):
**Unit 8 & 9
Droylsden Shopping Centre
Greenside Lane
Manchester
Postcode: M43 7YY**

12. Telephone number at premises (if known): **N/A**

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

Ground floor premises, unit within shopping centre

14(a) Are the premises situated in more than one licensing authority area? **No**

14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, other than the licensing authority to which this application is made:

N/A

Part 4 – Times of operation

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? **No**

[Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be no.]

15(b). If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence. **N/A**

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon			
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates: **No**

Part 5 – Miscellaneous

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued): *(dd/mm/yyyy)*

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? **No**

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application.

19(a). Do you hold any other premises licences that have been issued by this licensing authority?

No

19(b). If the answer to question 19(a) is yes, please provide full details: **N/A**

20. Please set out any other matters which you consider to be relevant to your application:

The Applicant operates a national estate of licensed bingo premises which include the provision of Bingo Plus and Bingo Express terminals.

The operator has full authority to provide licensed bingo by the provision of an Operating Licence granted by the Gambling Commission. The UK's Gambling Regulator has therefore approved the measures implemented to ensure that effective anti-money laundering procedures are implemented and our policies have been developed to ensure responsible trading in accordance with the gambling legislation, the licensing objectives and the licence conditions and code of practice.

A copy of Cashino Gaming Limited's Operation Standards has been provided in support of the application and full copies of the Applicant's policies and procedures are available, if required.

Part 6 – Declarations and Checklist (Please tick)

We confirm that, to the best of our knowledge, the information contained in this application is true. We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

We confirm that the applicant(s) have the right to occupy the premises.

Checklist:

- Payment of the appropriate fee is enclosed
- A plan of the premises is enclosed
- We understand that if the above requirements are not complied with the application may be rejected
- We understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

Part 7 – Signatures

21. Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:



Print Name: Poppleston Allen

Date: 23rd June 2020

Capacity: Solicitors for & on behalf of the applicant

22. For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: _____

Date: _____

Capacity: _____

[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 21 and 22.]

[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]

Part 8 – Contact Details

23(a) Please give the name of a person who can be contacted about the application:

Richard Bradley

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted:

0115 948 7424

24. Postal address for correspondence associated with this application:

Richard Bradley

Poppleston Allen

37 Stoney Street

The Lace Market

Nottingham

Postcode: **NG1 1LS**

25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

r.bradley@popall.co.uk

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POPULATION HEALTH

ASHTON-UNDER-LYNE · AUDENSHAW · DENTON · DROYLSDEN · DUKINFIELD · HYDE · LONGDENDALE · MOSSLEY · STALYBRIDGE

Jeanelle De Gruchy
Director of Population Health
Population Health

Tameside One, Market Place
Ashton-under-Lyne, Tameside. OL6 6BH

www.tameside.gov.uk
e-mail : simon.watts@tameside.gov.uk

Call Centre 0161 342 8355

Doc Ref
Ask for Simon Watts
Date 21 July 2020

Re: Representation from the Population Health Department at Tameside Council regarding the application for a new gambling premise licence in regards to Unit 8 & 9, Droylsden Shopping Centre, M43 7YY.

I, Simon Watts on behalf of Public Health make representation in relation to the application for a new gambling premises licence review at Unit 8 & 9, Droylsden Shopping Centre, M43 7YY.

The representation relates primarily to the protection of vulnerable groups, including children. The attached report highlights evidence relating to gambling harms in the area and the proximity of this new application to vulnerable groups.

In summary, it is estimated that there are 5,400 adults in Tameside who are suffering from gambling harm, 570 of whom live in Droylsden. Younger people and those on lower incomes or unemployed have been found to be more at risk of suffering harm from gambling. Given this application is in the centre of Droylsden, which is one of the more deprived locations in Tameside, and is in close proximity to a number of schools and other gambling establishments, approving the application would put the local population, including children, at increased risk of harm from gambling.

Based on the evidence summarised in the attached report, Public Health feel that the granting of this licence will undermine the licencing objective of the “protection of children and vulnerable adults”.

Yours Sincerely,

Simon Watts
Registrar in Public Health

Public Health Evidence in Response to Gambling Licence Application – Droylsden

Introduction

This brief report summarises available evidence on gambling harms in response to a recent application for a new gambling premise licence in Droylsden.

Context - Gambling Harms

Recent research suggests approximately 3% of the adult population are likely to have a gambling problem (1), though this is likely to be an underestimate (2). In Tameside, this equates to 5,400 adults (3). For Droylsden, this is the equivalent of 570 adults (4). It is estimated that a further 6-10 people close to gamblers are harmed for every person who gambles problematically (5).

14% of children age 11-16 in the UK have gambled in the last week, and 39% in the last 12 months according to national research (6); this is more children than had smoked, drank alcohol or taken drugs. In 2019, nearly 7,000 secondary school students were surveyed across Leeds about gambling; of the 24% who had admitted to gambling previously, bingo was the second most popular gambling method (7), only 1% behind the most common method.

Tameside's gambling licencing policy highlights a number of groups who are vulnerable to gambling harms, including those listed below (8):

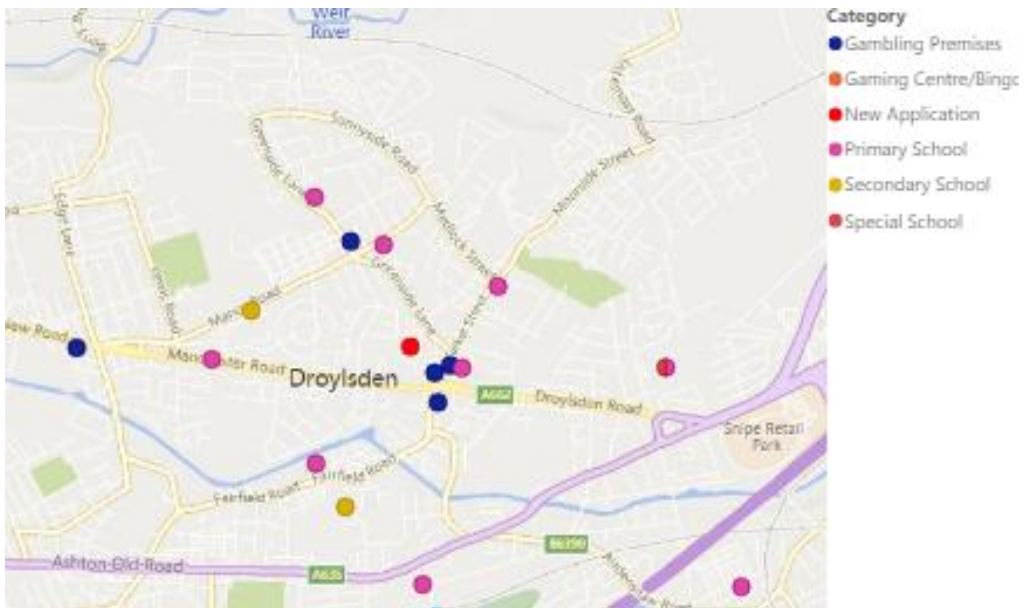
- Children and young people aged 16-24
- Those who live in deprived areas

Tameside MBC has worked with other councils in Greater Manchester, the Gambling Commission and a regional counselling charity to ensure that people can access support if they are gambling problematically, but also to improve public awareness of gambling harms as a health issue. This has involved counselling clinics being set up in Tameside, as well as proactively communicating with residents about the potential harm from gambling (9). To date, only 6 referrals for gambling counselling support were made for residents from Droylsden postcodes during 2019, though 570 adults are estimated to be experiencing harm (10).

Granting a new licence in this area would undermine the efforts made to date to reduce harms and potentially lead to mixed messages for local residents.

Proximity of Licence Application to Existing Licences in the Area and Vulnerable Groups

There are already 5 venues where residents can gamble close to the centre of Droylsden, in close proximity to where the new application has been made, figure 1 below. As one can see from the map, the addition of a further licence in this area would increase the density of gambling establishments, and in an area where there are 9 primary schools and 2 secondary schools in close proximity, potentially increase the exposure of younger residents to gambling.



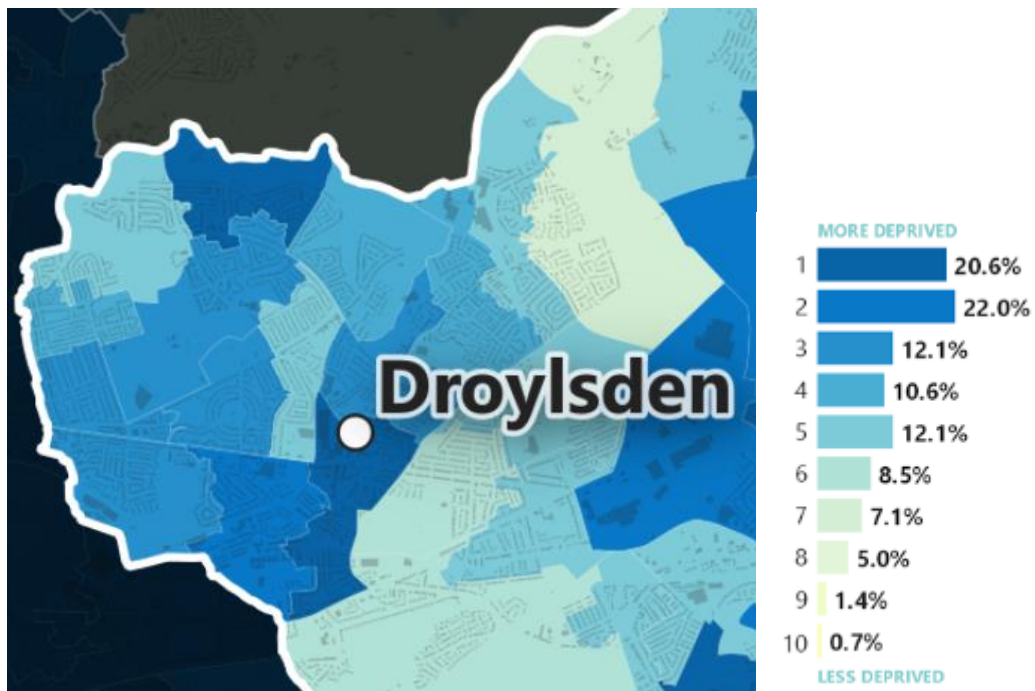
Note, the recent application from Merkur Slots is the circle in red.

Source: Tameside Licencing Data

Deprivation

The centre of Droylsden where the application is being made is in the top 10% most deprived LSOAs nationally, figure 2. As such it's residents are likely to already be experiencing a higher level of gambling harm (11).

Figure 2 – LSOAs by Deprivation Decile in Droylsden



Source: Sheffield University: <https://imd2019.group.shef.ac.uk/>

Note, percentages apply to the Tameside population as a whole

Summary

The centre of Droylsden has high levels of deprivation relative to the rest of Tameside and England, a high density of existing gambling establishments, and also a high number of schools close by.

Given the evidence reviewed, it is likely that the addition of a further gambling establishment in this area would put the local population, including children, at increased risk of harm from gambling and counteract some of the progress made in supporting local residents over the last 12 months.

Based on the evidence outlined above, Public Health feel that the granting of this licence will undermine the licencing objective of the “protection of children and vulnerable adults”.

References

1. **Dinos, Sokratis, et al.** Treatment Needs and Gap Analysis in Great Britain . [Online] 20 07 2020. <https://about.gambleaware.org/media/2191/treatment-needs-and-gap-analysis-in-great-britain-a-synthesis-of-findings1.pdf>.
2. *Lies, Damned Lies and ‘Problem Gambling’ Prevalence Rates: The Example of Victoria, Australia.* **Doughney, James.** 2014, Journal of Business Systems, Governance and Ethics, p. 14.
3. **TMBC.** Key Statistics about Tameside. *Key Statistics about Tameside.* [Online] 20 07 2020. <https://www.tameside.gov.uk/demographic-information>.
4. **City Population.** Droylsden Population. [Online] 20 07 2020. https://www.citypopulation.de/en/uk/northwestengland/greater_manchester/E35000734__droylsden/.
5. **Citizens Advice .** Out of luck - An exploration of the causes and impacts of problem gambling. [Online] [Cited: 20 July 2020.] <https://www.citizensadvice.org.uk/Global/CitizensAdvice/Consumer%20publications/Out%20of%20Luck.pdf>.
6. **Gambling Commission.** Young People & Gambling 2018. [Online] 20 July 2020. <https://www.gamblingcommission.gov.uk/PDF/survey-data/Young-People-and-Gambling-2018-Report.pdf>.
7. **Leeds City Council.** *My Health, My School survey 2019: Key findings on young people and gambling.* Leeds : s.n., 2019.
8. **TMBC.** Statement of Principles 2019-2022 - Gambling Act 2005. [Online] [Cited: 20 July 2020.] <https://www.tameside.gov.uk/TamesideMBC/media/policy/Gambling-Act-Policy.pdf>.
9. —. Support for gambling addiction available. [Online] 20 July 2020. <https://public.tameside.gov.uk/pressreleases/f1030pressreleasestory107.asp?story=2124&keyword=>.
10. **GambleAware.** *Treatment Provider Data 2015-2019.* Tameside : s.n., 2020.
11. **Wardle, Heather.** *Exploring area-based vulnerability to gambling-related harm: Who is Vulnerable? Findings from a quick scoping review.* Geofutures, Gambling and Place Research Hub. 2015.
12. **IPSOS Public Affairs.** *The Prevalence of Underage Gambling.* 2015.

47 Shelley Grove
 Drayden M43 74F
 11 July 2020



Dear Sir / Madam

I write to object to the "Bingo premises application" from Casino Gaming Ltd, for Marker Slots, in unit 8 and 9 Drayden Shopping Centre.

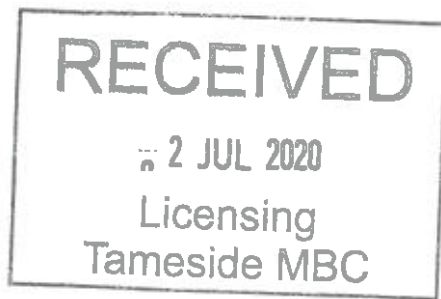
The application states "new Bingo premises" but from the submitted plans it is clearly a "slot machine arcade" I believe it to be wholly inappropriate application for a shopping precinct.

The precinct is a pathway to several local junior schools who's pupils use it constantly.

I believe it will act as a magnet for children to gather there.

We have on regular occasions had had to call the police to intervene, when youths have been seen breaking onto the Concorde Suite from the rear roof area, again I believe this kind of development would exacerbate this behaviour, I would also point out there are 2 bookmakers within 50 yards of this application I also note the applicant is asking for opening hours from 9am until midnight, I would suggest this is totally wrong for a shopping precinct.

Barnes Hallam Councillor for Drayden West West



Ann J Holland,
117 Shelley Grove,
Droylsden M13 7YF
Tel 0161 370 2481
2nd July, 2020.

Dear Sir/Madam,

I am Writing to object to the Bingo Premises application from Casino Gaming Ltd Sebeck House 1A Sebeck Place Milton Keynes MK5 8FR.

The application is for Premises in Droylsden Shopping Centre Unit 8 and 9.

I am concerned firstly about the young people of Droylsden who have for many years have been hanging about the Shopping Centre getting into the first floor of the Concord Building climbing breaking into the Concord and some of the shops. Having organized a Youth Club for a number of years I have had to contact the Police many times because of the Problems in the Shopping Centre and on the Metro link. The Walkway through the Centre is a pathway going and coming from School in the area. My Concern is Gambling Premises like the Casino will encourage young people gambling and loitering, and as on many occasions Drug abuse.

The lighting in the Shopping Centre goes off at 11pm. The Premises referred to as being open late are all on the Outskirts of the Town Centre e.g. King's Head, Beehive, Silly Country. They are not in the internal part of the Shopping Centre, The Shops are all closed at 5-30pm.

Yours Ann J Holland
(Droylsden West Councillor)

Rebecca Birch

From: Mike Robinson
Sent: 28 July 2020 13:37
To: Rebecca Birch
Subject: FW: Bingo premises licence

Mike Robinson

Regulatory Services Manager (Licensing)

Environmental Services (Public Protection)
Operations and Neighbourhoods
Operations and Neighbourhoods

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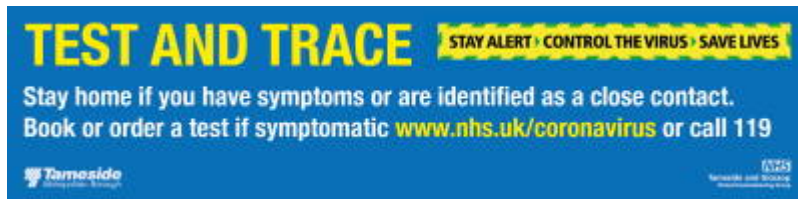
Tame Street Depot | Tame Street | Stalybridge | Tameside | SK15 1ST

Tel. 0161 342 4122

Mobile. 07971285294

Fax. 0161 342 2275

Email Disclaimer <http://www.tameside.gov.uk/disclaimer>



From: Councillor Laura Boyle
Sent: 20 July 2020 11:25
To: Mike Robinson
Subject: Bingo premises licence

Hi

Please could you include my comments as an objection to this application

I would like to raise objections to the Bingo premises licence application at Merkur slots, Droylsden Shopping Centre, Greenside Lane,, M437YY

I feel that the proposed opening hours may create a potential for public nuisance and anti-social behaviour in the area the adjacent shops all close at 5.30.pm

Also I feel that in the interests of prevention of crime and disorder that a premises of this nature with the proposed opening hours suggested may lead to potential criminal activity in. The area. Also what measures will be put into place to police entry on the door of younger members of our community so in the interests of public safety I think this activity in this area with the conditions stated would be detrimental to the public safety of the area

Sent from [Workspace ONE Boxer](#)

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RECEIVED

08 JUL 2020

Licensing
Tameside MBC

To whom it may concern,

re:- application for a Bingo Premises License at units 8 & 9 Droyloden Shopping Centre.

As curate at [REDACTED] I would like to raise an objection to this application. The precinct is an area that many children and families pass through on their way to and from the local schools. Tameside's Statement of Principles 2019-2022 states that the Authority seeks to "protect children and other vulnerable people from being harmed or exploited by gambling." (introduction). If this establishment is open during school times, I feel it will encourage particularly the teenagers to use the slot machines.

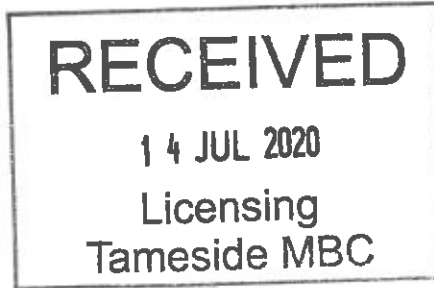
According to the Church of England Parish Spotlight (which uses the most recent census information) 20% of under 16s in Droyloden live in poverty and almost half of those in work, do so for more than 35 hours per week. At a time when so many jobs are at risk and in an area where there is little spare cash anyway, I think Tameside should very carefully consider this application. There are already a few bookmakers in the area that have slot machines.

Kind regards

Re: Bingo Premises application,

Cashino Gaming Limited

Merkur Slots,
Unit 8&9,
Droylsden Shopping Centre,
Greenside Lane,
Droylsden,
M43 7YY.



Dear Sirs,

With reference to the above Licensing Act application I would like to object on the following grounds:

The Protection of children from Harm.

The latest Census Data (2011) shows that 20% of children live in poverty in our area. During the Covid-19 pandemic the Droylsden & District Foodbank has seen an increase of 600% in referrals from local schools in comparison with the same period 2019. As job uncertainty continues as we move out of lockdown the 20% figure of children in poverty may well increase.

The application states opening times from 9am through to midnight on most days. Droylsden precinct, where the units relating to this application are based, is a main thoroughfare for families journeying to and from local primary schools. It is also a thoroughfare for older children walking to and from local secondary schools and to those accessing the tram to schools outside of the immediate area.

I understand that the application relates to slot machine bingo and has no social aspect to it but just the gambling element.

Yours sincerely

