

To: Councillor Edwards (Chair)
Councillors Woodward, Barnett-Ward,
Carnell, Challenger, Ennis, McGonigle,
Maskell, Page, Rowland, Rynn and Skeats

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Your contact is: **Julie Quarmby - Committee Services**

NOTICE OF MEETING - LICENSING APPLICATIONS COMMITTEE 1 FEBRUARY 2022

A meeting of the Licensing Applications Committee will be held on Tuesday, 1 February 2022 at 6.30 pm in the Council Chamber, Civic Offices, Reading. The Agenda for the meeting is set out below.

<u>ACTION</u>	<u>WARDS AFFECTED</u>	<u>Page No</u>
1. DECLARATIONS OF INTEREST		
Councillors to declare any disclosable pecuniary interests they may have in relation to the items for consideration.		
2. MINUTES		3 - 4
To confirm the Minutes of the Licensing Applications Committee meeting held on 22 June 2021.		
3. PETITIONS		
Petitions submitted pursuant to Standing Order 36 in relation to matters falling within the Committee's Powers and Duties which have been received by the Assistant Director of Legal and Democratic Services no later than four clear working days before the meeting.		
4. QUESTIONS		
To receive any questions from Councillors and members of the public.		
5. HACKNEY CARRIAGE VEHICLE EMISSIONS AND AGE POLICY REVIEW	BOROUGH WIDE	5 - 14

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A report considering a request by Reading Taxi Association to extend the pause in the Hackney Carriage Vehicle Emissions and Age Policy 2019 by a further year, until 1 October 2023

6. REVIEW OF THE STATEMENT OF GAMBLING LICENSING PRINCIPLES **BOROUGH WIDE** **15 - 60**

A report seeking authorisation of a revised Statement of Gambling Licensing Principles to be in effect from 31 January 2022 until 31 January 2025.

Present: Councillor Edwards (Chair);
Councillors Carnell, Challenger, Ennis, McGonigle, Page,
Rowland and Woodward.

Apologies: Councillors Maskell, Rynn and Skeats

2. MINUTES

The Minutes of the Licensing Applications Committee meetings held on 9 December 2020 and 26 May 2021 were confirmed as correct records and signed by the Chair.

3. POSTPONING THE 2021 HACKNEY CARRIAGE UNMET DEMAND SURVEY

The Director for Economic Growth and Neighbourhood Services submitted a report asking the Committee to consider whether an Unmet Demand Survey should be carried out during the current Covid 19 pandemic and whether it would be appropriate to amend the current limiting policy approach to hackney carriage numbers. A copy of an e-mail sent to both Reading taxi trades and a response from RTA was attached to the report at Appendix 1.

The report explained that a moratorium on the issue of new hackney carriage vehicle licences had been implemented in March 2009 and had been maintained ever since, following analysis of unmet demand surveys completed in 2012, 2015 and 2018, each of which confirmed there was no significant underlying unmet demand for hackney carriages in Reading. Officers were in the process of arranging a new survey in accordance with the Taxi requirements of Section 16 of the Transport Act 1985 and the Department for Transport and Private Hire Vehicle Licensing: Best Practice Guidance 2010 (Sections 45 to 51) when the Covid19 pandemic caused the country to go into three national lockdowns which had made it impossible to continue with the implementation of a survey.

The report set out guidance that had been produced by the Department for Transport which stated:

“Section 16 of the Transport Act 1985 does not specify the frequency of the unmet demand assessment, but the Department’s Best Practice Guidance issued in 2010 suggested this is conducted every three years. Though the decision as to when an unmet demand survey is conducted remains that for a licensing authority, we are aware that we are in a very unusual situation at present; while this continues it would seem highly unlikely that there would be significant unmet demand for taxis. We would expect unmet demand surveys to be conducted once travel levels return to more normal levels or if concerns are raised by the trade or public.”

If a survey was to be conducted in the current circumstances, it was highly unlikely the results would be a true reflection of the trade in Reading or of levels of demand

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for hackney carriage vehicles. Accordingly, the report proposed that the survey be delayed until such time as a more normal level of usage was apparent.

No public consultation had taken place, although comments had been requested from both the Reading Taxi Association and the Reading Cab Drivers Association. There had been no response from the Reading Cab Drivers Association. The response from the Reading Taxi Association agreed to delay the Unmet Demand Survey by 12 months and confirmed that, at the moment, there were only an estimated 93 HCVs working the ranks out of the 216 licensed HCVs, and that carrying out a survey now would be unfair on rental drivers. Chris Avery, Reading Cab Drivers Association and Asif Rashid, Reading Taxi Association attended the meeting, addressed the Committee, and both confirmed to the Committee that they agreed the survey should be delayed until 2022.

Resolved -

- (1) That the Unmet Demand Survey not be implemented in 2021 due to the current financial hardship that was affecting the Reading Borough Council Hackney Carriage trade and that it be delayed until 2022 when it was hoped that the current financial difficulties due to the Covid 19 pandemic had eased following the return of business to the trade;
- (2) That the current policy of not issuing any further hackney carriage licences, be retained pending a review in late 2022.

The meeting closed at 6.52pm

READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES

TO:	Licensing Committee		
DATE:	1 February 2022		
TITLE:	HACKNEY CARRIAGE VEHICLE EMISSIONS AND AGE POLICY REVIEW		
LEAD COUNCILLOR:	Cllr Tony Page	PORTFOLIO:	Strategic Environment Planning & Transport
SERVICE:	Planning Transport & Regulatory Services	WARDS:	Boroughwide
LEAD OFFICER:	Catherine Lewis	TEL:	72975
JOB TITLE:	Licensing & EP Manager	E-MAIL:	Catherine.lewis@reading.gov.uk

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 Licensing Committee resolved to adopt the current Hackney Carriage Vehicle Emissions and Age Policy on 23 October 2019 with the purpose of improving the hackney carriage vehicle fleet by removing the older and more polluting vehicles whilst also improving local air quality within Reading.
- 1.2 At Committee on 9th December 2020 the Hackney Carriage Vehicle Emissions and Age Policy was paused for two years until 1st October 2022 due to the impact of the pandemic. At the time of the report, Reading Taxi Association (RTA) had requested a 3 year delay to the implementation of the policy due to the current challenging economic conditions. The RTA stated that they were currently running at a loss of 70-75% of their work in the day time and up to 95% after 10pm, with only 50% of the fleet currently working.
- 1.3 The purpose of this report is to review this decision in view of the ongoing effects of the Covid-19 pandemic and the request of the RTA to extend the pause in the policy by a further year, extending it to 1 of October 2023.

2. RECOMMENDED ACTION

- 2.1 The recommendation is to apply a hybrid approach extending the pause in policy by a further year to October 2023 but removing the oldest most polluting vehicles from the fleet by October 2022.
- 2.2 To extend the incentive for a free licence for 100% electric vehicles to October 2023 (4.4.2)

3. POLICY CONTEXT

- 3.1 The Council's Hackney Carriage Vehicle Emissions and Age Policy was adopted on 23 October 2019 at full licensing committee following consultation with the trade. It follows the Governments move to end the sale of conventional petrol and diesel

vehicles by 2030 and a commitment to meet short and longer-term reductions in air quality emissions. This policy is in line with the Reading Climate Emergency Strategy 2020-25, Local Transport Plan and Air Quality Action Plan.

- 3.2 Since the policy was implemented in October 2019, 14 vehicles have upgraded to Euro 5b standard and are under 8 years old. A further 5 have upgraded outside of the policy timescales. There has been no significant move to Ultra Low Emission vehicles (ULEV), with only 2 ULEV hackney carriage vehicles currently on the fleet.
- 3.3 To help alleviate congestion in Reading and to support the work to improve air quality, the council are working to reduce the need for private cars and build the alternative transport portfolio. This includes improving the availability and image of alternative transport. Bus services have moved to a cleaner and greener fleet and the transfer of the taxi fleet to a more sustainable low emission fleet will complement this and provide greater choice to the customer.
- 3.4 This policy is intended to improve the hackney carriage vehicle fleet by removing older vehicles, creating a safer more reliable fleet and removing more polluting vehicles which will improve local air quality within Reading. The policy aims to encourage the move to cleaner vehicles and highlight the benefits to the trade as residents and businesses demand a greener alternative transport offer. The Policy aligns with the spirit of the transport theme of the Reading Climate Emergency Strategy which seeks to accelerate the shift to low carbon transport in general and reduce emissions from the taxi fleet specifically.

4. THE PROPOSAL

4.1 Current Position:

- 4.1.1 The current policy (as adopted in 2019) uses a staged approach to remove the older and more polluting vehicles whose exhaust fumes are harmful to health and detrimental to the environment. The policy was formulated in consultation with the Reading Taxi Association (RTA) and the Reading Cab Drivers Association (RCDA) following the declaration of the Climate Change Emergency.
- 4.1.2 Local authorities across the country have introduced similar policies including: Manchester, Southampton, Birmingham, Nottingham and Wokingham. Some Local Authorities have adjusted these policies given the current Pandemic. See Appendix III.
- 4.1.3 The Council received representations from the Reading Taxi Association (RTA) in relation to the timetabled approach to the emissions policy on 19th August 2020 and 15th October 2020 due to the economic impact of the pandemic. They sought financial reprieve until the pandemic was under control as they state they cannot afford to upgrade their vehicles.
- 4.1.4 Most recently the RTA have requested a further delay to implementation of the policy requesting that all vehicles Euro 5a and below are given an additional year under the Hackney Carriage Emissions Policy agreed by the Licensing Committee on 23 October 2019. This would mean no changes to the existing fleet would be required until 1st October 2023. There would be no change to the end date of the programme so in effect the impact to the trade would be delayed but they would still be required to meet the overall objectives of the policy.
- 4.1.5 The following table shows the Council's original Hackney Carriage Vehicle Emissions and Age Policy implementation timetable. NB* *dates in italics have passed therefore all requirements would have to be met when the policy restarts.*

Date	Proposed Standard
23 Oct 2019*	<i>Vehicle Age Policy - all vehicles 15 years old or less Vehicle Age Policy - 100% electric 20 years</i>
23 Oct 2019*	<i>All Replacement vehicles will be a min of Euro 5b and less than 8 years old. Applies regardless of whether the vehicle is new to fleet or an existing vehicle.</i>
1 Oct 2021*	<i>Vehicle Age Policy 14 years for vehicles up to and including Euro 5a (vehicles registered before 1/10/07 removed)</i>
1 Oct 2022	Vehicle Age Policy 13 years for vehicles up to and including Euro 5a (vehicles registered before 1/10/09 removed)
1 Oct 2023	Vehicle Age Policy 12 years for vehicles up to and including Euro 5a (vehicles registered before 1/10/11 removed)
1 Oct 2025	All Replacement vehicles are minimum ULEV and less than 8 years old. This rule will apply regardless of whether the vehicle is new to fleet or an existing vehicle.
1 Oct 2028	All vehicles to be minimum ULEV

4.2 Options Proposed

- 4.2.1 Officers recommendation is to delay the policy by a further year until October 2023 as requested by the trade with the exception of the oldest most polluting vehicles. These vehicles should be taken off the fleet by 1 October 2022.
- 4.2.2 There are currently 130 Euro 4 vehicles on the fleet which are the oldest most polluting vehicles. Some vehicles would be 17 years old by 1 October 2023, which can be tired and unreliable. Removing all vehicles of a 2006 plate and older would ensure the Council continues to progress towards meeting its obligations in relation to climate change and air quality.

Year	Number of Vehicles	Years old Oct 22	Years old Oct 23
2006	16	16	17
2007	44	15	16
2008	38	14	15
2009	17	13	14
2010	16	12	13

4.3 Other options considered.

- 4.3.1 Officers considered not extending the pause further, re-starting the policy as of 1 October 2022. This option would not take into account the impact the continued pandemic is having on the trade.
- 4.3.2 Officers considered accepting the RTA proposal and introducing a further extension of 1 year, pausing the policy until October 2023. This option however, would mean that there is no emission improvement from the fleet for a further period and an aging fleet would continue to work in Reading.

4.4 Incentives

- 4.4.1 The council have been offering the following incentives for those upgrading their vehicles.

Date	Incentives
From 1 April 2020	All ULEV (CO ₂ <50g/km emissions) pay a 25% reduction in the annual standard vehicle fee. 100% electric vehicles will receive a 50% reduction in the annual standard vehicle fee.
Offer Ends 1 Oct 2022	Any ULEV/100% electric vehicle that has never been on the fleet before receives a free licence for its first year on the fleet.

- 4.4.2 The Council recommend the offer is extended for any ULEV/100% electric vehicle that has never been on the fleet before to receive a free licence for its first year on the fleet up until 1 October 2023.
- 4.4.3 There continues to be a Plug in Taxi Grant of £7,500 and a £2,500 LEVC deposit contribution available to drivers in Reading.
- 4.4.4 Funding and approval has been secured via the Council's Capital budget fund to install Rapid (50kW) EV charge points for taxi fleet use at Gun Street, Bridge Street and in the Cattle Market Car Park. Officers are currently liaising with SSE for the infrastructure installation. Further options are currently being explored about increasing the capacity in the Cattle market Car Park to 75kW or even 150kW to reduce the charging time and future proof them.

5. CONTRIBUTION TO STRATEGIC AIMS

- 5.1 The proposals in the report meets the overall direction of the Council by meeting the Corporate Plan priorities as follows:

1. Securing the economic success of Reading and provision of job opportunities - the Council understands that HCVs are an important part of the overall transport strategy for the town
2. Keeping Reading's environment clean, green and safe - ensuring the reduction in emissions from HCVs and improving the overall air quality within the town.
3. Ensuring the Council is fit for the future - implementing the Government and Council objectives of a less polluting and lower carbon environment.

5.2 Healthy Environment

- Developing Reading as a Green City with a sustainable environment and economy at the heart of the Thames Valley - reducing the emissions from the HCV fleet will contribute to a lower carbon footprint for the town.
- Promoting equality, social inclusion and a safe and healthy environment for all - reducing the emissions from the HCV fleet will reduce the NOx and particulate matter in the air which is associated with poor health outcomes.

5.3 Thriving Communities

- Officers have seriously considered the proposal put forward by the trade and the effects of the pandemic. Hackney Carriage Drivers have been subject to a loss of trade as the Governments advice to work from home and for people to consider their social plans carefully continues reducing peoples need for transportation. Many licensed premises (restaurants, pubs and clubs) within the borough saw a loss of 40 - 50 % in trade over the Christmas period normally one of the busiest times of year.

5.5 Inclusive economy

- One of the policies aims is to encourage the move to cleaner vehicles and highlight the benefits to the trade as residents and businesses demand a greener alternative transport offer. The Council is working to support the shift with the implementation of EV infrastructure accelerating the move to low carbon transport in general and reduce emissions from the taxi fleet specifically.

5.4 The proposal contributions to the following TEAM Reading values:

- **Together** - Continues to support the trade through this difficult time whilst looking to maintain the overall aim of the policy and remove the most polluting vehicles.
- **Efficiency** - The Council are utilising Government Funding to support the EV infrastructure within Reading.
- **Ambitious** - The overall end timeline to have all HC vehicles ULEV by 2028 has not changed.
- **Make a Difference** - By encouraging a shift to greener transport there will be an improvement in air pollution levels within the borough,

6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

- 6.1 The emissions strategy involves the reduction of carbon dioxide and the reduction of nitrogen oxide (NO_x) and particulate matter namely particulate matter of size 0.01 mm (PM₁₀) and particulate matter of size of 0.0025 mmm (PM_{2.5}). Both NO_x and particulate matter are found in diesel fuel. Particulate matter is also associated with tyre, brake and road wear.
- 6.2 Reduction in carbon emissions can be achieved by converting to Ultra Low Emission Vehicles (ULEV). These vehicles will be either 100% electric which will emit no tail pipe CO₂, NO_x or particulate matter or a Zero Emissions Capable (ZEC) model which uses electric with a backup EURO6 petrol engine for use when the battery has run out during long journeys. The petrol engine will emit some CO₂, NO_x or particulates
- 6.3 Reading has an Air Quality Management Strategy which covers NO_x but also considers PM₁₀ and PM_{2.5}. There is a current 2015/16 action plan which identifies as one of its commitments to 'explore and implement ways to improve emissions from Reading's taxi fleet'. The 2015/16 action plan is in the process of being updated.
- 6.4 Furthermore Reading has been identified by the Department for Transport as failing to meet the National objective level for NO_x of 40µg/m³. The site adjacent to the Hackney Carriage Vehicle rank at the South West Interchange was one of those sites.
- 6.5 Health - an improvement in air quality will improve health outcomes for people who work, live or socialise in Reading. The Reading's Joint Strategic Needs Assessment estimated that there were 63 deaths in 2017 of all-cause mortality attributable to anthropogenic particulate air pollution. Whilst levels in Reading do not breach the national level of particulate PM10 of 40µg/m³, average levels over the monitoring sites show 21µg/m³ with 2 of the 3 monitoring sites that have rising annual levels.
- 6.6 The Climate Impact Assessment tool at Appendix II identified that the recommended proposal will create a negative Environmental and Climate Impact. By enabling a further extension to the policy allows the most polluting vehicles to stay on the fleet for longer. There are currently 130 Euro 4 vehicles on the fleet. This proposal is to remove just 16 of those by October 2022 with the remainder staying on until October 2023. The pandemic is currently impacting the trade and evidence gathered from a sample of vehicles within the fleet indicates the number of trips being made within the borough

has reduce from pre pandemic levels by about 40% lessening the overall impact. The end date of the policy will not change thus meaning the Council are still on target for reducing overall emissions by 2028.

7. COMMUNITY ENGAGEMENT AND INFORMATION

- 7.1 The HCV trade were consulted as the group of individuals who are most affected by the policy. The Reading Taxi Association provided their views and proposal to the Emissions and Age Policy.

8. EQUALITY IMPACT ASSESSMENT

- 8.1 The policy aims to raise the standards of the Hackney Carriage Fleet within Reading whilst improving the Environmental and Climate for all within Reading. It is acknowledged that the economic decision will impact hackney carriage owners more than any other group of people. We have given consideration of the impact of the pandemic on the Hackney Carriage Trade as a group when making our decision.

9. LEGAL IMPLICATIONS

- 9.1 The Local Government (Miscellaneous Provisions) Act 1976, section 47(1) states that a Council may attach to the grant of a licence of a HCV under the Town Clauses Act 1847 such conditions as the Council may consider reasonably necessary. Section 47(2) states that without prejudice to the generality of the foregoing subsection, a district council may require any HCV licensed by them under the 1847 Act to be of such a design or appearance or bear such distinguishing marks as shall clearly identify it as a HCV. Section 47 (3) states that any person aggrieved by any conditions attached to such a licence may appeal to a Magistrates' Court.

10. FINANCIAL IMPLICATIONS

- 10.1 All HCVs must be licensed annually and will require a similar amount of staffing in order to process the licence and carry out the enforcement action. The amount of enforcement action will be the same for ULEV and electric as for 100% fuel vehicles. The Council will receive a lower income (Appendix I) from owners who purchase a ULEV or 100% electric vehicle. It is anticipated this will happen gradually between 2022 and 2029 but could peak in the years where a free licence is offered and be significantly reduced from 2025 and 2028 when all new to fleet vehicles must be ULEV and subsequently all vehicles must be ULEV.
- 10.2 The financial implications arising from the proposals will depend on take up of the incentives. An estimate indicates that there would be a net loss of income of between £10-15k per annum when all vehicles have made the switch and a varied loss dependent on the numbers due for an upgrade prior to this.

11. BACKGROUND PAPERS

- 11.1 There are none

Appendices

Appendix I Financial Implications

Appendix II Climate Change Assessment Tool

Appendix III Comparison with other LA policies are detailed here.

Appendix I

FINANCIAL IMPLICATIONS

The financial implications arising from the proposals set out in this report are set out below:-

1. Revenue Implications

Use this Table in the report or as an Appendix to set out the revenue implications:

	2022/23 £000	2023/24 £000	2024/25 £000
Employee costs (see note1) Other running costs Capital financings costs	£76,272	£76,272	£76,272
Expenditure	£76,272	£76,272	£76,272
Income from: Fees and charges (see note2) Grant funding (specify) Other income	227 HC plates issued at a cost of £336 =£76,272	=£76,272- £15,000	=£76,272- £15,000
Total Income	£76,272	=£61,272	=£61,272
Net Cost(+)/saving (-)	0	+£15,000	+£15,000

Note 1: If there is a take up of the incentives offered due to the move to EV or ULEV there will be an impact on the budget income, but the expenditure will stay the same.

Note 2: The reduction in income is based on 130 vehicles upgrading and applying a 25% reduction for ULEV and 50% reduction for electric upgrades.

2. Capital Implications

There are no capital cost implications from this proposal.

3. Value for Money (VFM)

Appendix III details other Local Authority Emission policies. Reading are not alone in continuing to push for an upgraded fleet. Other local authorities offer a variety of incentives to encourage the trade to upgrade their vehicles.

4. Risk Assessment.

The proposed incentives will mean there is a loss of income even though resources required to process and issue a licence for the vehicles stays the same. If there is a greater take up of electric which would be welcomed for an environmental perspective would greatly impact Licensing income.

APPENDIX RS-4

Project / Proposal Name or Reference:		Date:	Your Name:
Statement of Gambling Licensing Principles			
1. IMPACT ON CARBON EMISSIONS			
HOW WILL THIS PROJECT/PROPOSAL AFFECT:	CONSIDERATIONS <i>See guidance below on determining whether negative or positive impacts are High, Medium or Low</i>	IMPACT? <i>Use drop down list</i>	SUMMARISE HOW YOU PLAN TO MANAGE AND REDUCE ANY NEGATIVE IMPACTS
1 ENERGY USE	* More energy will be consumed or emissions generated (by RBC or others) = Negative Impact * No extra energy use is involved or any additional energy use will be met from renewable sources = Nil Impact * Energy use will be reduced or renewable energy sources will replace existing fossil fuel energy = Positive Impact	Medium Negative	Consider: - Energy efficiency measures - Renewable energy - Reducing demand for energy By offering a further extension to the policy over 100 vehicles that should have come off the fleet will be permitted to stay on the fleet until 1 Oct 2023. This permits the continuing generation of emissions within the borough that would otherwise have been reduced.
2 WASTE GENERATION	* More waste will be generated (by RBC or others) = Negative Impact * No waste will be generated = Nil Impact * Less waste will be generated OR amount of waste that is reused/recycled will be increased = Positive Impact	Nil	Consider: - Re-usable/recycled goods - Recycling facilities - Reducing/reusing resources N/A
3 USE OF TRANSPORT	* RBC or others will need to travel more OR transport goods/people more often/further = Negative Impact * No extra transport will be necessary = Nil Impact * The need to travel, the use of transport and/or of fossil fuel-based transport will be reduced = Positive Impact	Nil	Consider: - Use of public transport - Reducing need to travel or transport goods - Alternative fuels/electric vehicles/walking and cycling Supporting evidence (Table 1) taken from a sample of vehicles on the fleet indicates that there has been a reduction in miles driven to pre pandemic levels. The reduction is approximately 40%. Supporting the claim that pandemic has meant there is less trade and less trips by H/C being taken within the borough at this time.
2. IMPACT ON RESILIENCE TO THE EFFECTS OF CLIMATE CHANGE			
HOW WILL THIS PROJECT/PROPOSAL AFFECT THE ABILITY OF READING TO WITHSTAND:	CONSIDERATIONS <i>See guidance below on determining whether negative or positive impacts are High, Medium or Low</i>	IMPACT? <i>Use drop down list</i>	SUMMARISE HOW YOU PLAN TO MANAGE AND REDUCE ANY NEGATIVE IMPACTS
4 HEATWAVES	* Increased exposure of vulnerable people and/or infrastructure to heat stress = Negative Impact * No increase in exposure to heat stress = Nil Impact * Reduced exposure of vulnerable people and/or infrastructure to heat stress = Positive Impact	Nil	Greater need for cooling, ventilation, shading and hydration methods N/A
5 DROUGHT	* Water use will increase and/or no provision made for water management = Negative Impact * Levels of water use will not be changed = Nil Impact * Provision made for water management, water resources will be protected = Positive Impact	Nil	Greater need for water management and perhaps reserve supplies N/A
6 FLOODING	* Levels of surface water run-off will increase, no management of flood risk = Negative Impact * Levels of surface water run-off & flood risk are not affected = Nil Impact * Sustainable drainage measures incorporated, positive steps to reduce & manage flood risk = Positive Impact	Nil	Consider flood defence mechanisms or alternative arrangements (business continuity) N/A
7 HIGH WINDS / STORMS	* Exposure to higher wind speeds is increased or is not managed = Negative Impact * No change to existing level of exposure to higher wind speeds = Nil Impact * Exposure to higher wind speeds is being actively managed & reduced = Positive Impact	Nil	Greater need for stabilisation measures, robust structures resilient to high winds N/A
8 DISRUPTION TO SUPPLY CHAINS	* Exposure to supply chain disruption for key goods and services is increased = Negative Impact * No change in exposure to supply chain disruption for key goods and services = Nil Impact * Exposure to supply chain disruption for key goods and services is reduced = Positive Impact	Nil	Source key goods and services locally as it reduces exposure to supply chain disruption and boosts the local economy N/A
Weighing up the negative and positive impacts of your project, what is the overall rating you are assigning to your project?:		Net Low Negative	This overall rating is what you need to include in your report/ budget proposal, together with your explanation given below.

Supporting Evidence Table 1

Average mileage across sample	2019	2020	2021
per vehicle	38380	21157	23312
Extrapolated to	8712260	4802639	5291824
convert to km	1402098.5	7729079.05	8516344.036
Nox g/km	670203251	369449979	407081244.9
PM g/km	73189560	40345792.6	44455315.87
CO2 g/km	3074802780	1694987035	1867634247

Guidance on Assessing the Degree of Negative and Positive Impacts:

Note: Not all of the considerations/ criteria listed below will necessarily be relevant to your project

Low Impact (L)	<ul style="list-style-type: none"> No publicity Relevant risks to the Council or community are Low or none No impact on service or corporate performance
Medium Impact (M)	<ul style="list-style-type: none"> No impact on capital assets, or relates to minor capital assets (minor works) Local publicity (good or bad) Relevant risks to the Council or community are Medium Affects delivery of corporate commitments Affects service performance (e.g.: energy use, waste generation, transport use) by more than c.10% Relates to medium-sized capital assets (individual buildings or small projects)
High Impact (H)	<ul style="list-style-type: none"> National publicity (good or bad) Relevant risks to the Council or community are Significant or High Affects delivery of regulatory commitments Affects corporate performance (e.g.: energy, waste, transport use) by more than c.10% Relates to major capital assets (larger buildings and infrastructure projects)

In the box below please summarise any relevant policy context, explain how the overall rating has been derived, highlight significant impacts (positive and negative) and explain actions being taken to mitigate negatives and increase positives. This text can be replicated in the 'Environment and Climate Impacts' section of your Committee Report, though please note you may need to supplement this climate impact assessment with commentary on other (non-)

By enabling a further extension to the policy allows the most polluting vehicles to stay on the fleet for longer. There are currently 130 Euro 4 vehicles on the fleet. The proposal is to remove just 16 of those by October 2022 with the remainder staying on until October 2023. The pandemic is currently impacting the trade and the number of trips being made within the borough has reduced from the number of trips being made pre pandemic lessening the overall impact. However it is recognised that there will be a negative impact if this proposal is permitted. Overall the end date of the policy will not change thus meaning the Council are still on target for reducing overall emissions by 2028.

Appendix III A table to show a comparison with other LA policies are detailed here

LA	Max Age	Max age first registration on fleet	CAZ	Emissions standard	Incentives
London	12 (15 for EURO6 and ULEV)	ZEC ULEV	Yes	EURO6	£10,000 towards replacement with ZEC ULEV (all 1,250 payments have now been taken up)
Greater Manchester	12		Yes - £7.50 for EURO5 diesel or earlier from 30 May 2022 (temp exemption GM taxis to 30 May 2023)	EURO6 (to avoid CAZ charges)	£10,000 towards replacement with ZEC
Southampton	12			EURO5 by 1 Jan 2020 EURO6 by 1 Jan 2022	£3000 EV incentive scheme
Portsmouth		ZEC ULEV	Yes - £10 per day for EURO5 or earlier diesel taxis	EURO6	
Birmingham	15	All new must be ULEV by 2026	Yes - £8 for EURO5 diesel or earlier from June 2021	EURO6 ULEV by 2026	
Oxford		Currently less than 5 years old. From Jan 2022 must be ZEC ULEV.		All Vehicles ULEV by 2025	
Nottingham	10 year diesel, 12 year ZEC ULEV	6 years		All EURO6 by 2020	
Wokingham	10				
Bracknell	10				

- In July 2019 Transport for London released a staged approach age policy for their HCV fleet whereby ultimately no vehicle will be older than 12 years by 2022.
- Manchester and Southampton councils currently have a maximum age policy of 12 years. Whereas Birmingham Council has a maximum age policy of 15 years and Milton Keynes has a maximum age policy of 10 years. Oxford City Council require all Hackney Carriage Vehicles to be a minimum of Euro 4 from 1 January 2020, all new vehicles must be ULEV from 1 January 2022 and all vehicles must be ULEV by 1 January 2025.
- Southampton Council has now taken the decision to extend their cash back on their older taxis when purchasing new ULEV's from September 2020 until 31 December 2020. <https://www.southampton.gov.uk/environmental-issues/pollution/air-quality/concessions/>
- Birmingham Council has delayed the requirement for all new to fleet vehicles to be ULEV's from 2021 to 2026. <https://www.birmingham.gov.uk/blog/tph-bulletin/post/585/ulev-requirements-for-newly-licensed-vehicles>. However taxis that are not at least EUROVI will be charged to enter Birmingham's Clean Air Zone from June 2021.
- Nottingham City Council have made changes to their policy extending the lead in time for drivers to purchase a new ULEV taxi by six months. <https://www.nottinghampost.com/news/nottingham-news/taxi-drivers-refusing-buy-low-4153380>
- Wokingham Borough Council has delayed their 15yr hackney carriage age policy by 1 year and provided a reduction of £40 to their vehicle licence fees for a year (£248 to £208). <https://www.bracknellnews.co.uk/news/18776842.wokingham-taxi-drivers-giving-up-demand-plummets/?ref=rss>

REPORT BY DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES.

TO:	Licensing Committee		
DATE:	1 February 2022	AGENDA ITEM:	
TITLE:	REVIEW OF THE STATEMENT OF GAMBLING LICENSING PRINCIPLES		
LEAD COUNCILLOR:	Deborah Edwards	PORTFOLIO:	
SERVICE:	Planning, Transport & Regulatory Services	WARDS:	Borough Wide
LEAD OFFICER:	Robert Smalley	TEL:	0118 937 2846
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1. PURPOSE AND SUMMARY OF REPORT

- 1.1 On 25th September 2018, the Licensing Applications Committee approved the Council's current Statement of Gambling Licensing Principles. The current policy timeframe is 31st January 2019 to 31st January 2022.
- 1.2 The Gambling Act 2005 (the 'Act') requires that the Council review its Gambling Policy every three years. The policy typically runs for a three-year period starting and ending in January with the first appointed day under The Gambling Act 2005 (Licensing Authority Policy Statement) (First Appointed Day) Order 2006 being 31st January 2007.
- 1.3 The purpose of this report is to submit a revised Statement of Gambling Licensing Principles to be in effect from 31 January 2022 until 31 January 2025.

Appendix RS-1 - Statement of Gambling Licensing Principles

Appendix RS-2 - List of Consultees

Appendix RS-3 - Summary of Consultation Responses

Appendix RS-4 - Climate Impact Assessment

2. RECOMMENDATIONS - DECISIONS/ACTIONS REQUIRED

- 2.1 That the revised "Statement of Gambling Licensing Principles", as attached at Appendix RS-1, be approved for implementation on 31st January 2022.

3. POLICY CONTEXT

- 3.1 Under the Act, Reading Borough Council, as the licensing authority, has responsibility for:

- Licensing premises for gambling activities (and temporary use) e.g. betting shops & casinos.
- Regulating gaming and gaming machines in clubs and miners' welfare institutes.
- Granting permits to family entertainment centres for the use of certain lower stake gaming machines.
- Regulating gaming and gaming machines on alcohol licensed premises such as pubs.
- Granting permits for prize gaming.
- Registering small society lotteries.
- Producing a local area profile for the Borough of Reading and ensuring that applications are consistent with the licensing objectives and policy of the Council.
- Enforcing the provisions of the Act.

3.2 The gambling framework must center around the 3 licensing objectives:

- to protect children and other vulnerable people from harm;
- to prevent gambling being a source of crime or disorder; and
- to ensure that gambling is conducted in a fair and open way.

3.3 Licence fees for gambling activities are set centrally but are banded so that local authorities have some discretion in the level of fee payable.

4. THE PROPOSAL

4.1 Current Position:

4.2 The Gambling Act 2005 (the 'Act') requires that the Council review its Gambling Policy every three years. The policy typically runs for a three-year period starting and ending in January with the first appointed day under The Gambling Act 2005 (Licensing Authority Policy Statement) (First Appointed Day) Order 2006 being 31st January 2007.

4.3 The three-year period for the current Gambling Policy comes to an end on 31st January 2022 and therefore a revised Policy needs to be in place from 31st January 2022

4.4 Option Proposed:

4.5 Approval is sought to implement the revised Statement of Gambling Licensing Principles as detailed at **Appendix RS-1**.

4.6 The revised Statement of Gambling Licensing Principles will come into force on 31st January 2022

4.7 There are a few small changes to the Statement of Gambling Licensing Principles. These are mostly updating statistical figures, maps and contact details.

4.8 Section 11.2 of the current policy has been removed due to the stakes for Fixed Odds Betting Terminals (FOBT's) being reduced from £100 to £2 by the Gaming Machine (Miscellaneous Amendments and Revocation) Regulations 2018 which came into force on 01st April 2019. Since this change there have been no reports showing that these machines are having the same detrimental effects as they were prior to the above regulations and therefore no longer warrant particular scrutiny when addressing licence applications.

4.9 Other Options Considered:

4.10 No other options considered as a policy is required under the Gambling Act 2005

5. CONTRIBUTION TO STRATEGIC AIMS

5.1 This policy and its implementation contribute to the following strategic aims in the Council's Corporate Plan 2021-22:

- Protecting and enhancing the lives of vulnerable adults and children.
- Securing the economic success of Reading.

5.2 The aim of the policy is to find a balance between securing the safety and amenity of our residential and business communities and responsibly maintaining and developing Reading's role as a major entertainment and cultural centre.

5.3 The policy considers the Gambling Commission's aim to strengthen social responsibility and to ensure that operators of gambling premises are risk assessing their operation in line with the local area profile drawn up by the Licensing Authority. The policy also aims to ensure that all gambling is conducted with a view to promoting the licensing objectives and to encourage operators to promote responsible gambling, in line with the relevant codes of practice and guidance issued by the Gambling Commission.

6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

6.1 There are no specific environmental or climate implications to this policy.

6.2 There are currently 33 licensed premises, of which, 27 are of small retail unit size and 6 are larger buildings (casinos, bingo hall & adult gaming centre). It is not envisaged that any premises that fall under this policy will negatively impact the following to any significant degree: air quality, biodiversity, wildlife, green space, natural habitats, landscape/visual impact, natural resources, noise pollution, waste/waste management.

6.3 Furthermore, no significant increase in emissions of greenhouse gases/ carbon dioxide are expected. It is not possible to predict how the total number of premises, nor the number of customers to such premises will fluctuate over the next 3 years of the proposed policy, however, there has been a decrease of 3 licensed premises throughout the current policy period.

- 6.4 There has also been an increase in the number of remote gambling activity (gambling online via computer, smartphone etc)
- 6.5. The Climate Impact Assessment is attached at **Appendix RS-4**.

7. COMMUNITY ENGAGEMENT AND INFORMATION

- 7.1 Consultations regarding the review of the Council's Gambling Policy were sent to various bodies within the gambling industry, groups who deal with the effects of gambling and responsible authorities stated within the Gambling Act.

The list of consultees is attached at **Appendix RS-2**.

- 7.2 The consultation period ran from 14th December 2021 until 11th January 2022 and responses are attached at **Appendix RS-3**

8 EQUALITY IMPACT ASSESSMENT

- 8.1 Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to—
- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 8.2 The aim of the Gambling Policy is to ensure the night time economy is safe and accessible to all.

9 LEGAL IMPLICATIONS

- 9.1 The Gambling Act 2005 requires Local Authorities to review, consult and publish a Statement of Gambling Licensing Principles every three years. Failure to do so would lead to the Council being in breach of its statutory obligation.
- 9.2 Local Authorities may attach such conditions to certain categories of licences as they may consider reasonably necessary, in accordance with the Act. All applications for premises licences will need to demonstrate how they will promote the licensing objectives; adhere to the relevant codes of practice and guidance issued by the Gambling Commission and adhere to the Licensing Authority's Statement of Gambling Licensing Principles, specifically the Local Area Risk Profile for their area of operation. Whilst there is an expectation that the Licensing Authority will 'aim to permit' a licence, it shall only do so, subject to the applicant meeting the criteria set out in this paragraph and in paragraph 8.1.1 of the Council's Statement of Gambling Licensing Principles.

10. FINANCIAL IMPLICATIONS

10.1 The financial implications arising from the proposals set out in this report are set out below: -

10.2 Revenue Implications

	2021/22	2022/23	2023/24
Employee costs	£0	£0	£0
Other running costs	£21,622	£21,622	£21,622
Capital financings costs	£0	£0	£0
Expenditure	£0	£0	£0
Income from:			
Fees and charges	£21,622	£21,622	£21,622
Grant funding	£0	£0	£0
(specify)			
Other income	£0	£0	£0
Total Income	£21,622	£21,622	£21,622
Net Cost (+)/saving (-)	£0	£0	£0

10.3 Capital Implications

Capital Programme reference from budget book	2021/22	2022/23	2023/24
Proposed Capital Expenditure	£0	£0	£0
Funded by			
Grant (specify)			
Section 106 (specify)			
Other services			
Capital Receipts/Borrowing			
Total Funding	£0	£0	£0

10.4 Value for Money (VFM)

The annual licence fees charged cover the cost of enforcement. Licence fees for gambling activities are set centrally but are banded so that local authorities have some discretion in the level of fee payable.

10.5 Risk Assessment

The Council is required by statute to review, consult and publish a Statement of Gambling Licensing Principles every three years. Failure to do so would lead to the Council being in breach of its statutory obligations and could lead to judicial proceedings being taken against it which would incur significant costs to the Council.

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Reading Borough Council

Statement of Gambling Licensing Principles

Draft - to come into force in March 2022 if approved

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www.reading.gov.uk



Reading
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Reading Borough Council
Statement of Gambling Licensing Principles

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STATEMENT OF GAMBLING LICENSING PRINCIPLES

1. Introduction

1.1 Section 2 of this Statement is the interpretation section.

1.2 The Council is the Licensing Authority under the Act. The Council is responsible for granting premises licences in the Borough of Reading in respect of:-

Casino premises;
Bingo premises;
Betting premises, including tracks;
Adult Gaming Centres;
Family Entertainment Centres.

1.3 The Act requires the Council to prepare and publish a Statement of Principles that it proposes to apply in exercising its functions under the Act. The Act requires that the Statement be reviewed every three years. This Statement was last reviewed in 2019.

1.4 This Statement has been prepared having regard to the provisions of the Guidance issued by the Commission and the licensing objectives of the Act and will be available on the Council's website.

1.5 This Statement will come into effect on the date of adoption by the Council and will be reviewed as necessary, and at least every three years from the date of adoption.

1.6. The Borough of Reading

The Borough is some 4040 hectares in size with a current population of 161,780 persons within its boundary and a population of 233,000 persons within the greater Reading urban area. 35% of the population is made up from Black and Minority Ethnic communities. The strategic location of M4 and the proximity to Heathrow Airport and London has permitted Reading to develop into a major employer in computer companies. In the centre of Reading is located a major shopping and leisure area, which also has a thriving evening economy. Unemployment in Reading is generally low. The areas surrounding the town centre are generally residential with some industrial zones, small shopping precincts and leisure facilities.

1.7 Consultees

The following have been consulted in respect of this Statement: -

- (a) Thames Valley Police;
- (b) Representatives of the holders of the various licences for premises within the Borough who will be affected by this Statement;
- (c) Persons/bodies representing the interests of persons likely to be affected by this Statement.

2. Interpretation Section

Within this Statement, the following words and terms are defined as stated:

Act:	The Gambling Act 2005
Applications:	Applications for licences and permits as referred to in Section 6 of this Statement
Borough:	The area of Reading administered by Reading Borough Council (Map appended at Appendix A)
Code of Practice:	Means any relevant code of practice under section 24 of the Act
Commission:	The Gambling Commission
Council:	Reading Borough Council
Default Condition:	Means a specified condition provided by regulations to be attached to a licence, unless excluded by the Council
Interested Party:	<p>For the purposes of the Act, a person is an interested party in relation to a premises licence if, in the opinion of the Licensing Authority which issues the licence or to which the application is made, the person: -</p> <ul style="list-style-type: none">(a) Lives sufficiently close to the premises to be likely to be affected by the authorised activities;(b) Has business interests that might be affected by the authorised activities;(c) Represents persons who satisfy a) or b) above.
Licences:	As defined in Section 5 of this Statement
Licensing Objectives:	As defined in Section 4 of this Statement
Mandatory Condition:	Means a specified condition provided by regulations to be attached to a licence
Notifications:	Means notification of temporary and occasional use notices
Premises:	Any place, including a vehicle or vessel.
Regulations:	Regulations made under the Act
Responsible Authority:	For the purposes of the Act, the following are responsible authorities in relation to premises:

The Licensing Authority in whose area the premises are wholly or mainly situated;
The Gambling Commission;
Thames Valley Police;
Royal Berkshire Fire and Rescue Service;
Planning Department, Reading Borough Council;
Health & Safety Team, Reading Borough Council;
Environmental Protection Team, Reading Borough Council;
Reading Local Safeguarding Children Board;
HM Customs and Excise.
Any other person prescribed by regulation made by the Secretary of State.

3. Who may make representations

3.1 Responsible authorities and interested parties are entitled to make representations in response to applications for premises licences, provisional statements and applications for review of premises licences.

3.2 The Council will give due consideration to each case in deciding whether a person is an interested party. The factors which the Council shall take into consideration in determining whether a person lives sufficiently close to the premises to be likely to be affected by the authorised activities include: -

The size of the premises;

The nature of the premises;

The distance of the premises from the location of the person making the representation;

The potential impact of the premises (number of customers, and routes likely to be taken by those visiting the establishment);

The circumstances of the complainant. This is not the personal characteristics of the complainant, but the interest of the complainant which may be relevant to the distance from the premises. For example, it could be reasonable for an authority to conclude that 'sufficiently close to be likely to be affected' could have a different meaning for (a) a private resident, (b) a residential school for children with truanting problems, and (c) a residential hostel for vulnerable adults.

3.3 In determining whether a person has a business interest that might be affected by the authorised activities, the Council will take a flexible approach. Such persons may include partnerships, charities, churches, medical practices, residents' associations, trade associations, trade unions and landlords.

3.4 In principle, the Council may allow any person to represent an interested party, although it may initially seek written confirmation that the person authentically represents the interested party. Generally, evidence shall be required that a person or body represents someone. However, this will not apply to a person's legal representative. The requirement will also not apply to interested parties' Councillors or Members of Parliament.

4. Licensing objectives

In carrying out its functions in respect of applications for, and review of, premises licences, and applications for provisional statements, and consideration of temporary use notices, the Act requires that the Council shall aim to permit the use of the premises for gambling insofar as the Council thinks it reasonably consistent with the three licensing objectives which are:-

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;

Ensuring that gambling is carried out in a fair and open way; and

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

It must be noted that 'aim to permit' does not mean 'will permit'. An applicant must ensure that their application is not in conflict with the legislation and this policy. For more information, please see paragraphs 8.1.2 and 8.1.3 below.

5. Types of Licence

This Statement sets out the policies that the Council will apply when making decisions upon applications made for: -

Premises Licences;
Provisional Statements;
Temporary Use Notices;
Permits as required under the Act;

6. Licensable Premises and Permits

This Statement relates to the following:-

- (a) Casinos Premises;
- (b) Bingo Premises;
- (c) Betting Premises;
- (d) Tracks;
- (e) Adult Gaming Centres;
- (f) Family Entertainment Centres (Licensed & Unlicensed)
- (g) Club Gaming Permits;
- (h) Prize Gaming Permits;
- (i) Gaming machines on alcohol licensed premises;

7. Applications

7.1 An application for a premises licence can only be made by a person who either holds an operating licence authorising him to carry on the activity in respect of which a premises licence is sought, or has made an application for an operating licence which has not yet been determined.

7.2 Applications for the grant, transfer or variation of a premises licence and provisional statement must demonstrate how the applicant will prevent the

licensing objectives being adversely affected. The applicant may ask the Council for advice as to the scope of information to be provided.

7.3 An applicant can apply for a provisional statement in respect of premises:

- (a) That he expects to be constructed,
- (b) That he expects to be altered, or
- (c) That he expects to acquire a right to occupy

8. Determination of Applications

The Council shall take into consideration the following in determining applications for the below:-

- (a) Premises Licences, provisional statement and temporary use notices

Codes of Practice issued by the Commission, guidance issued by the Commission, the licensing objectives, this Statement and other relevant factors.

- (b) Unlicensed Family entertainment centre gaming machine permit

The licensing objectives, guidance issued by the Commission and this Statement.

- (c) Club gaming permit and club machine permit

The licensing objectives, guidance issued by the Commission and this Statement.

- (d) Licensed premises gaming machine permit

The licensing objectives, guidance issued by the Commission, other relevant matters and this Statement.

- (e) Prize gaming permit

The licensing objectives and guidance issued by the Commission and this Statement.

8.1 Determination of Applications for a Gambling Premises Licence

8.2 Whilst the Licensing Authority shall aim to permit the use of a premises for gambling - as per section 153 of the Gambling Act 2005 - it shall only do so if the applicant can demonstrate how their application is:

- a) In accordance with any relevant code of practice issued under Section 24 of the Gambling Act 2005.
- b) In accordance with any relevant guidance issued by the Gambling Commission under Section 25 of the Gambling Act 2005.
- c) Reasonably consistent with the licensing objectives.

- d) In accordance with the Council's Statement of Licensing Policy issued under Section 349 of the Gambling Act 2005.

8.3 If the applicant is able to demonstrate that their application for a premises licence meets the above requirements, then the Licensing Authority shall aim to permit the application. If an application is contrary to the Council's licensing policy or an applicant has not demonstrated that their application is in accordance with points a-c above, then the application is likely to attract representations.

9. General Principles

9.1 Nothing in this Statement shall undermine the rights of any person to apply for any licence under the Act and have the application considered on its individual merits or override the right of any person to make representations on any application for a licence or a review of a licence where they are permitted to do so under the Act.

9.2 On consideration of an application for a premises licence, provisional statement or on consideration of a temporary use notice the presumption shall be to grant the application without conditions. Mandatory and default conditions are the only conditions that are required to be attached to a licence at minimum and, in most cases, will be sufficient to promote the licensing objectives, however, additional conditions will be imposed where there is clear evidence of a risk to the licensing objectives in the circumstances of a particular case which is not already adequately addressed by the policies, procedures and mitigation measures described in an applicant's risk assessment. Conditions may also be considered if the application is contrary to this policy or has not taken into account the Council's Local Area Profile information. It is required for applicants to demonstrate how they will mitigate the risks within their local area and this should be done via a local area risk assessment and the submission of conditions if deemed appropriate. Any conditions applied will not be overly onerous and will be proportionate to the scale of the application and the risks involved. Conditions will generally be considered unnecessary if they are already adequately covered by other legislation.

9.3 No conditions may be attached to permits.

9.4 Licensing is about the control of premises where facilities for gambling are provided. Conditions may be attached to licences that will cover matters that are within the control of individual licensees.

9.5 When considering any conditions to be attached to licences, the Council will primarily focus on the direct impact of the activities taking place at licensed premises on members of the public living, working or engaged in normal activity in the area concerned.

9.6 Conditions will be applied to licences that are proportionate and appropriate to the business, organisation or individual concerned. The Council will draw upon advice and the guidance issued by the Commission and attach conditions relative to the given circumstances of each individual case.

9.7 Conditions attached to licences will, so far as possible, reflect local crime prevention strategies. For example, closed circuit television cameras

may be appropriate in certain premises.

9.8 The Secretary of State may by regulation provide for specified conditions to be attached to a premises licence as either “mandatory” or “default” conditions.

9.9 In determining an application for licences the Licensing Authority may not have regard to the expected demand for the facilities for gambling that it is proposed to provide.

9.10 Responsible authorities and interested parties who make representations must relate their representations to any relevant code of practice and guidance issued by the Commission, the licensing objectives and this Statement.

9.11 The Council recognises that, apart from the licensing function, there are a number of other mechanisms available for addressing issues of unruly behaviour that can occur away from licensed premises, including: -

- (a) Planning controls;
- (b) Ongoing measures to create a safe and clean environment in these areas in partnership with local businesses, transport operators and other Council departments;
- (c) Regular liaison with the police on law enforcement issues regarding disorder and anti-social behaviour;
- (d) The power of the police, other responsible authorities or local residents and businesses to seek to have premises licences reviewed.

9.12 When determining an application, the Council cannot take into account irrelevant matters. In determining an application for a premises licence or a provisional statement, it cannot take into consideration whether the applicant’s application for planning or building control permission in respect of the premises will be successful.

10. Application for a Premises Licence and Primary Gambling Activity

10.1 The primary activity of each premises licence type is specified on the premises licence when it is issued. Section 150 of the Gambling Act 2005 authorises the provision of gambling facilities for the following types of premises licences:

- (a) casino premises
- (b) bingo premises
- (c) betting premises, including tracks and premises used by betting intermediaries
- (d) adult gaming centre premises
- (e) family entertainment centre premises

10.2 In betting premises, gaming machines may be made available for use only where there are also substantive facilities for non-remote betting, as per social responsibility code 9.1.1. The Code of Practice and Guidance set out the requirements on operators to ensure that their premises meet the terms of the Act and the relevant conditions.

10.3 Buildings divided into more than one premises

10.3.1 Part 7, paragraph 7.5 of the Commissions Guidance states that “there is no reason in principle why a single building could not be subject to more than one premises licence provided they are for different parts of the building, and the different parts of the building can be reasonably regarded as being different premises”. Examples are given of multiple unit premises, such as pleasure parks, tracks, or shopping malls. A shopping mall will have multiple self-contained units (premises) which are located within one building. It is also possible for licensed premises to be located next to each other as long as there are no restrictions regarding direct access between these premises imposed on that category of gambling premises from its mandatory conditions. The council will follow this guidance.

10.3.2 In considering whether different areas of a building are genuinely separate premises the council will take into account factors which will include: whether there are separate registrations for business rates in place for the premises, whether the premises are owned or operated by the same person, and whether the premises are operated independently of each other.

10.4 Separation of premises within a single building

10.4.1 When considering proposals to divide a building into genuinely separate premises the council will also need to be satisfied that the form of separation between the premises is appropriate. The separation between one premises and another must be clearly defined. Any barrier used to separate one premises from another must be permanent and constructed so the public cannot go from one premises to another. The council would not, for example, be likely to consider that separation of areas of a building by ropes, or by low level, or moveable partitions to be appropriate.

10.5 Access to Premises

10.5.1 The Gambling Act 2005 (Mandatory and Default Conditions) Regulations 2007 restrict access to different types of licensed gambling premises. In considering proposals to divide a building into different premises the council will have to be satisfied that proposals to divide buildings are compatible with the mandatory conditions which relate to access between premises.

10.5.2 The relevant provisions of the regulations relating to access are set out in paragraph 7.23 of the Commission’s Guidance. In a number of types of licensed premises there are provisions on access that prevent customers from being able to enter the premises directly from other licensed premises.

10.5.3 The Commission Guidance at paragraph 7.22 states “There is no definition of ‘direct access’ in the Act or regulations, but licensing authorities may consider that there should be an area separating the premises concerned, for example a street or café, which the public go to for purposes other than gambling, for there to be no direct access.”

In particular, where premises are not accessed from the street, the council has sought to define the nature of the area which must separate licensed premises and through which the premises are accessed, so as to prevent direct access between premises in order to comply with the provisions of the Act and regulations. It is the council’s opinion that any area which separates licensed premises, and

from which those premises can be accessed, must be genuinely separate premises which are habitually and actually used by members of the public other than those using the licensed premises.

11. Location Policy

When determining an application for the grant or review of a premises licence, the grant of a provisional statement or when considering a temporary use notice, regard will be given to the proximity of the premises to schools, vulnerable adult centres or residential areas where there may be a high concentration of families with children. Applicants should consult the Council's Local Area Profile Map - attached at appendix D to this policy - and ensure that any application submitted provides a robust risk assessment to mitigate any potential risks to these groups. It is very important in such circumstances that applicants demonstrate how the licensing objectives will not be adversely affected. The proximity of premises taken into consideration will vary depending on the size and scope of the gambling premises concerned. Each case will, however, be decided on its merits.

11.1 Local Area Profile and Local Area Risk Assessments

11.1.1 The Licensing Authority shall expect all applicant's for grants or variations of a gambling premises licence to include full details of their local risk assessment as part of their applications. This is per the Social Responsibility Code 10.1.1 and Ordinary Code Provision 10.1.2 which both have effect from 6th April 2016.

11.1.2 Applicants will be expected to demonstrate how their operation shall not exacerbate issues of anti-social behaviour in the locality or undermine the licensing objectives - particularly in relation to the protection of children and other vulnerable people should the proposed site be located near schools or treatment centres. Applicants shall be expected to demonstrate how their application will be consistent with the licensing objectives during the submission of an application by taking into account the Local Area Map and other sources of readily available information and, if necessary and relevant, propose conditions that may mitigate the potential risks of being granted a licence in their proposed area. Failure to do this could lead to the application attracting representations.

11.1.3 A copy of Reading Borough Council's Local Area Profile Map is attached at Appendix D to this policy. This map shows the location of all gambling premises licences and their proximity to places of worship, schools and treatment centres. Levels of Anti-Social Behaviour are included on the map. Applicants are expected to take cognisance of this information when submitting applications for a gambling premises licence as it will inform any risk assessment that they will be required to submit.

11.1.4 If a licence is granted or varied, applicants are required to revise their local area risk assessments regularly to reflect any significant changes in the local environment, for example, the opening of a new treatment centre. Licensees shall be expected to share and produce a copy of their updated risk assessment to the Licensing Authority upon request.

11.1.5 As well as the Licensing Authority's Local Area Profile Map, applicants as well as current licence holders should take cognisance of the following sources of information when compiling and reviewing their local area risk assessments:

- a) crime statistics from the police.uk website - in particular the type of crime within the relevant locality;
- b) any neighbourhood group website containing information about specific localities;
- c) any relevant online mapping tools;
- d) other policies, initiatives or strategies issued or undertaken by Reading Borough Council concerning public health initiatives or protection of vulnerable groups. Particular attention should also be paid to the Council's policy on Safeguarding Children and Vulnerable Adults. Applicants and licence holders should also be aware of the Council's planning policy - particularly the Reading Central Area Action Plan which deals with clustering of certain premises - including betting shops.

11.1.6 There is publicly available data that shows the prevalence of problem gambling severity in each local authority and ward area as well as usage of, and reported demand for, treatment and support for gambling harms. This resource is provided by GambleAware and can be accessed via: <https://www.begambleaware.org/gambleaware-gb-maps>. We would expect applicants to take cognisance of this resource to assist in the creation of their local area risk assessment.

12. Prevention of Crime and Disorder Objective

12.1 The Council places a considerable importance on the prevention of crime and disorder and will fulfil its duty under s17 of the Crime and Disorder Act 1998 to do all it reasonably can to prevent crime and disorder in the borough. A high standard of control is, therefore, expected to be exercised over licensed premises.

12.2 The Council will, when determining applications, consider whether the grant of a premises licence will result in an increase in crime and disorder.

12.3 Public nuisance is not specified in the Act as a licensing objective. However, the Council may take cognisance of it, when considering applications for premises licences and a provisional statement and when considering a temporary use notice if it is of the opinion that in the circumstances of the case public nuisance may be tantamount to crime and/or disorder.

12.4 Applicants are encouraged to discuss the crime prevention procedures in their premises with the Council's Licensing Officers and Thames Valley police before making a formal application.

12.5 In considering licence applications, the Council will particularly take into account the following: -

- (a) The design and layout of the premises;
- (b) The training given to staff in crime prevention measures appropriate to those premises;

- (c) Physical security features installed in the premises. This may include matters such as the position of cash registers or the standard of CCTV that is installed;
- (d) Provision of door supervisors;
- (e) Where premises are subject to age restrictions, the procedures in place to conduct age verification checks;
- (f) The likelihood of any violence, public order or policing problem if the licence is granted.

13. Ensuring that gambling is conducted in a fair and open way objective

13.1 Generally, the Commission would not expect licensing authorities to become concerned with ensuring that gambling is conducted in a fair and open way, as this will be a matter for either the management of the gambling business (and, therefore, relevant to the operating licence), or will be in relation to the suitability and actions of an individual (and, therefore, relevant to the personal licence). Both of these options fall under the purview of the Commission. However, if the Council suspects that gambling is not being conducted in a fair and open way, this will be brought to the attention of the Commission so that it may consider the continuing suitability of the operator to hold an operating licence or of an individual to hold a personal licence.

13.2 Without prejudice to paragraph 13.1 above, for the purpose of ensuring that gambling is conducted in a fair and open way the Council may take into consideration the following:-

Whether the applicant has been, and is, willing to co-operate with enforcement agencies checking compliance with the licensing objective;

The history of the applicant in complying with advice given by enforcement agencies, in particular, officers of the Council, about compliance with the licensing objectives.

14. Designation of Reading Local Safeguarding Children Board as responsible authority

14.1 The Council is legally required to specify the principles which it will apply in exercising its powers under section 157(h) of the Act to designate, in writing, a competent body to advise it about the protection of children from harm. The principles are: -

- i. the need for it to be a body in Reading and be responsible for, or interested in, matters relating to the protection of children from harm;
- ii. the Council's desire that the body should act responsibly in performing the function and be such that would be willing to advise the Council if necessary.

14.2 As the Reading Local Safeguarding Children Board (Brighter Futures for Children) is a responsible authority for the purposes of the Licensing Act 2003, the Council hereby designates it as the responsible authority for the purpose of the

Act.

15. Protection of children and other vulnerable persons objective

15.1 With limited exceptions, the access of children and young persons to those gambling premises that are adult only environments will not be permitted.

15.2 The Council will seek to limit the advertising for premises so that gambling products are not aimed at children or advertised in such a way that makes them particularly attractive to children.

15.3 The Council will judge the merits of each separate application before deciding whether to impose conditions to protect children on particular categories of premises. This may include such requirements as:-

- (a) Supervision of entrances;
- (b) Segregation of gambling areas from areas frequented by children;
- (c) Supervision of gaming machines in non-adult gambling specific premises.

15.4 The Act provides for the Commission to issue one or more code of practice on access to casino premises by children and young persons and the Council will work closely with the police to ensure the appropriate enforcement of the law, especially relating to the sale and supply of alcohol to children.

15.5 In determining applications the Council shall take into consideration: -

Whether the applicant has been, and is, willing to co-operate with enforcement agencies checking compliance with this licensing objective;

The history of the applicant in complying with this licensing objective;

15.6 The applicant for premises licences, provisional statements and review of premises licences is required to serve a notice of the application on the Reading Safeguarding Children Board, which is a responsible authority.

15.7 Public Health are not specified in the Act as a Responsible Authority. However, the Council may have regard for their input particularly in relation to any local or national strategy involving the safeguarding of vulnerable adults or children and their exposure to potential harm, when considering applications for premises licences, provisional statements or temporary use notices.

16. Vulnerable Persons and Harm

16.1 It is noted that the Act and Commission Guidance does not define the term vulnerable persons. The Commission states that “it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs or other circumstances”. This is the definition of vulnerable persons the council will use in its consideration of applications.

16.2 It is noted that the Act does not contain a definition for the word harm or its

context. The Council considers harm to mean anything from the physical and mental which is not confined to an individual. For example, a problem gambler at harm from gambling can have negative effects on their families, friends and communities. This is the broad interpretation of 'harm' that the Council proposes to use when assessing applications and local risk assessments and licence holders are expected to put into place measures to identify problem gamblers and any harm they may cause to themselves or people around them and take appropriate steps to promote the licensing objective in this regard.

17. Licensing Reviews

17.1 The Council will carry out a review of a premises licence where it has received a formal application for a review, or of its own volition, in accordance with the Act. The review must be relevant to any relevant code and guidance issued by the Commission, the licensing objectives and this Statement. Representations may include, amongst others, issues relating to the following:-

Use of licensed premises for the sale and distribution of controlled substances and/or the laundering of the proceeds of crimes;

Use of licensed premises for the sale and distribution of illegal firearms;

Use of licensed premises for prostitution or the sale of unlawful pornography;

Use of licensed premises as a base for organised criminal activity;

Use of licensed premises for the organisation of racist, homophobic or sexual abuse or attacks;

Use of licensed premises for the sale of smuggled tobacco or goods;

Use of licensed premises for the sale of stolen goods.

18. Enforcement

18.1 Principles to be applied by the Council in exercising its functions under Part 15 of the Act with respect to the inspection of premises and the powers under Section 346 of the Act to institute criminal proceedings in respect of the offences specified in that Section are as follows: -

18.2 All licensing enforcement will be conducted in accordance with the Enforcement Concordat and the Council's Corporate Enforcement Policy.

18.3 The Council is a signatory to the Enforcement Concordat and will follow the principles set out in it. The concordat is based around the principles of consistency, transparency and proportionality.

18.4 The Enforcement Concordat (available upon request) proposes that a graduated response is taken where offences against legislation occur. An isolated administrative offence, such as failing to maintain certain records, may be dealt with by way of a written warning. More serious offences may result in a referral to Sub-Committee for a review of the premises licence or may result in a prosecution. Each case will be considered on its merits.

18.5 In deciding whether to institute criminal proceedings the Council shall take

cognisance of the public interest test and the realistic prospect of a conviction test as specified in the Attorney General Guidelines.

18.6 The Council intends to use appropriate enforcement to promote the licensing objectives. Once licensed, it is essential that premises are monitored to ensure that they are run in compliance with the specific requirements of the Act and in compliance with any licence conditions. It will also be important to monitor the Borough for unlicensed premises. The Council shall authorise officers for such purposes.

18.7 The Act provides for the Commission to issue one or more code of practice on access to casino premises by children and young persons and the Council will work closely with the police to ensure the appropriate enforcement of the law, especially relating to the sale and supply of alcohol to children.

19. Legislation

19.1 In undertaking its licensing function under the Act the Council is also bound by other legislation, including:-

Section 17 of the Crime and Disorder Act 1988;

Human Rights Act 1998.

19.2 This Statement is not intended to duplicate existing legislation and regulatory regimes that already place obligations on employers and operators.

20. Complaints against licensed premises

20.1 The Council will investigate complaints against licensed premises in relation to matters relating to the licensing objectives for which it has responsibility, including breach of a licence condition. In the first instance, complainants are encouraged to raise the complaint directly with the licence holder or business concerned to seek a local resolution.

20.2 Where an interested party or reasonable authority has made either a valid representation about licensed premises or a valid application for a licence to be reviewed, the Council may initially arrange a conciliation meeting to address and clarify the issues of concern.

20.3 This process will not override the right of any interested party or responsible authority to ask that the licensing committee consider their valid representations or for any licence holder to decline to participate in a conciliation meeting.

21. Assessment of Need

Unmet demand is not a criterion that will be taken into consideration when determining an application for a premises licence or provisional statement under the Act.

22. Casinos

There are currently 3 Casinos operating within the Borough. In addition to this

there is a further premises currently licensed, but not operating. There are no plans to limit or restrict the number of casinos operating within the Borough.

23. Gaming Permits

With regard to the number of gaming machines permitted on premises, the Council will grant permits in accordance with the Act as outlined in Appendix C to this policy. However, should applications be received for extra machines, where permitted, the council will determine each case on its merits giving due regard to the three licensing objectives.

24. Family Entertainment Centres (FECs)

24.1 Children and young persons may enter FECs but are not permitted to play Category C machines. The Council will expect the applicant to ensure that there will be sufficient measures in place to prevent under 18 years olds having access to the adult only gaming machine area.

24.2 Under section 247 of the Act, if premises have only Category D machines, a Family Entertainment Centre Gaming Machine Permit can be issued by the authority without the need to have an operator's Licence. The lack of a requirement to have an operator's licence means that the Commission will not have considered the suitability of the applicant. As a result of this, in these circumstances, the applicant shall be required to provide a criminal record check to enable the licensing authority to check the suitability of the applicant.

24.3 In exercising its functions in respect of Family Entertainment Centre Permits the Council need not, but may have regard to, the licensing objectives and must have regard to any guidance issued by the Commission.

25. Track Betting

25.1 Tracks are horse racecourses, dog tracks, or other premises on any part of which a race or other sporting event takes place or is intended to take place.

25.2 An application can be made for a premises licence for a betting track even though the applicant does not have an operator's licence.

25.3 If a betting premises licence is granted for a track the holder of the licence must ensure that anyone coming on to the track to take benefit of the premises licence must have a betting operator's licence.

25.4 The Council will require a plan to be submitted with an application for a betting premises licence showing the areas of the premises where betting will take place.

26. Equality

The Council, in undertaking its licensing function, will have due regard to the need to eliminate unlawful discrimination and to promote equality and good relations between persons of different ethnic groups.

27. Information exchange

27.1 In fulfilling its functions under the Act the Council will exchange relevant information with other regulatory bodies, including persons and bodies identified pursuant to section 350 of and schedule 6 to the Act to enable them to perform their statutory functions and will establish protocols in this respect. In exchanging such information, the Council will conform to the requirements of data protection and freedom of information legislation in accordance with the Council's existing policies. The Council will also have regard to any relevant guidance issued by the Commission and regulations made by the Secretary of State.

27.2 Pursuant to section 29 of the Act the Commission may require the Council to provide information that forms part of the Council's register maintained under the Act or information which is in the Council's possession in connection with a provision of the Act. The Council shall endeavour to provide to the Commission such information as it requires, without delay, mindful of the Commission's:-

- power to request the
- information. duty to issue
- codes and guidance.
- duty to promote the licence objectives.
- duty to advise the Secretary of State on matters relating to gambling.
- power to carry out activities for the purpose of assessing compliance with the Act and whether offences have been committed under the Act.
- duty to determine whether to grant an operating licence, and to enable it to be in possession of such information as it considers necessary about the provision of gambling facilities in licensed premises in the Council's area.
- enforcement duties pursuant to the Act.

28. Relationship with Planning Policies

The granting of planning permission and or building control approval is a separate process, which is carried out by other departments within the Council. However, applicants should have regard to planning policy when submitting their local area risk assessments and/or application. Applicants in the town centre, for example, should have regard to the Reading Central Area Action Plan and the issue of clustering in relation to betting premises.

29. National Strategies

The Council will also seek to discharge its responsibilities identified by other Government Strategies, in so far as they impact on the objectives of the licensing function.

30. Local Strategies and Policies

Where appropriate, the Council will consider applications with reference to other adopted local strategies and policies, including the following: -

- The Council's Corporate Strategy;
- The Community Safety Strategy;
- Enforcement policy.

31. Integrating Strategies

31.1 There are many stakeholders involved in the leisure industry and many are involved in the promotion of the licensing objectives. A number of stakeholders' plans and strategies deal with matters related to the licensing function. Where this is the case, the Council will aim, as far as possible, to co-ordinate them.

31.2 The Council recognises, in particular, the importance of the co-ordination and integration of this Statement with other plans aimed at the management of town centres and the night-time economy.

32. Relevant plans and strategies include:-

32.1 Crime and Disorder Reduction Strategy - The Council will fulfil its duty under section 17 of the Crime and Disorder Act 1998 to do all it reasonably can to prevent crime and disorder in the Borough. As far as possible, licensing decisions will aim to contribute to the targets set in the Crime and Disorder Strategy and conditions attached to licences will reflect local crime prevention strategies.

32.2 Local Transport Plan - the Council will consider ways in which the public can be dispersed from licensed premises and events so as to avoid disturbance, crime and disorder. The police will be encouraged to report on matters related to the swift and safe dispersal of people from licensed premises.

32.3 Racial Equality - The Council is required under race relations legislation to have due regard to the need to eliminate unlawful discrimination and to promote equality of opportunity and good relations between persons of different racial groups. As far as possible, licensing decisions will take account of racial equality.

32.4 Human Rights - The Human Rights Act 1998 incorporates the European Convention on Human Rights and makes it unlawful for a local authority to act in a way which is incompatible with a Convention right. The Council will have particular regard to the following relevant provisions of the European Convention on Human Rights: -

Article 6 that in the determination of civil rights and obligations, everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law;

Article 8 that everyone has the right to respect for his home and private and family life;

Article 1 of the First Protocol that every person is entitled to the peaceful enjoyment of his or her possessions, which may in certain circumstances include a licence.

32.5 Proper integration will be assured by the Council's Licensing Committee providing reports, when appropriate, to its Planning Committee on the situation regarding licensed premises in the area, including the general impact of gambling related crime and disorder, to enable the Planning Committee to have regard to such matters when taking its decisions.

32.6 Tourism and Town Centre Management - The Council aims to promote a high quality, thriving night-time economy.

33. Committee Terms of Reference

33.1 A Licensing Sub-Committee normally made up of three Councillors will sit to hear applications where representations have been received from interested parties and responsible authorities. The quorum of two Councillors may comprise the Sub-Committee. Ward Councillors will not normally sit on a Sub-Committee involving an application within their ward.

33.2 Where a Councillor who is a member of the Licensing Committee is making or has made representations regarding a licence on behalf of an interested party, in the interests of good governance they will disqualify themselves from any involvement in the decision making process affecting the licence in question.

33.3 The Licensing Committee will refer to the Full Council any matter it is unable to deal with because of the number of its members who are unable to take part in the consideration or discussion of any matter or vote on any question with respect to it.

33.4 Every determination of a licensing decision by the Licensing Committee or a Licensing Sub-Committee shall be accompanied by clear, cogent reasons for the decision. The decision and the reasons for that decision will be sent to the applicant and those who have made relevant representations as soon as practicable.

33.5 The Council's Licensing Officers will deal with all other licensing applications where either no representations have been received, or where representations have been received and it is agreed by the parties that a hearing is not necessary.

33.6 Decisions as to whether representations are irrelevant, frivolous or vexatious will be made by Council Officers, who will make the decisions on whether representations or applications for premises licences, provisional statements or review of premises licence should be referred to the Licensing Committee or Sub-Committee. Where representations are rejected, the person making that representation will be given written reasons as to why that is the case. There is no right of appeal against a determination that representations are not admissible save for by way of judicial review to the High Court.

34. Allocation of Decision Making Responsibilities

34.1 The Council will be involved in a wide range of licensing decisions and functions and has established a Licensing Committee to administer them as and when required or necessary.

34.2 Appreciating the need to provide a speedy, efficient and cost-effective service to all parties involved in the licensing process, the Committee has delegated certain decisions and functions and has established Sub-Committees to deal with them.

34.3 Many of the decisions and functions will be purely administrative in nature and the grant of non-contentious applications, including for example those licences and permits where no representations have been made, will be delegated to Council Officers.

34.4 The table shown at Appendix B sets out the agreed delegation of decisions and functions to Licensing Committee, Sub-Committee and Officers.

34.5 This form of delegation is without prejudice to Officers referring an application to a Sub-Committee or Full Committee if considered appropriate in the circumstances of any particular case.

35. Consideration of representations

35.1 Due consideration will be given to all relevant representations unless they fit the following:-

The grounds are frivolous;
The grounds are vexatious;
The grounds are irrelevant;
The grounds will not cause the Licensing Authority to revoke or suspend a licence or to remove, amend or attach conditions on the premises licence;
The grounds are substantially the same as the grounds cited in a previous application relating to the same premises; or
The grounds are substantially the same as representations made at the time the application for a premises licence was considered.

36. Further information

Further information about the Gambling Act 2005, this Statement of gambling licensing principles or the application process can be obtained from:-

The Licensing Team

Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Tel: 0118 937 3762
E-mail: licensing@reading.gov.uk
Website: www.reading.gov.uk

Information is also available from:-

Gambling Commission

Victoria Square House
Victoria Square
Birmingham
B2 4BP

Tel: 0121 230 6500
Email: info@gamblingcommission.gov.uk
Website: www.gamblingcommission.gov.uk

Other Responsible Authorities Contact Details: -

Noise and Nuisance Team
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Tel: 0118 937 3787
Email: Environment.ProtectionTeam@reading.gov.uk

Environmental Health
(Health and Safety)
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Tel: 0118 937 3787
Email: consumer.protection@reading.gov.uk

Thames Valley Police
Licensing Team Oxford
Road Kidlington
Oxon
OX5 2NX

Email: licensing@thamesvalley.pnn.police.uk

Royal Berkshire Fire & Rescue Service
Newsham Court
Pincents Kiln
Calcot
Reading
RG31 7SD

Tel: 0118 945 2888
Email: westhubfiresafety@rbfrs.co.uk

Planning Department
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Tel: 0118 937 3787
Email: plgadmin@reading.gov.uk

Reading Local Safeguarding Children Board
(Brighter Futures for Children)
Reading Borough Council

Civic Offices
Bridge Street
Reading
RG1 2LU

Tel: 0118 937 3787

Email: LADO@brighterfuturesforchildren.org

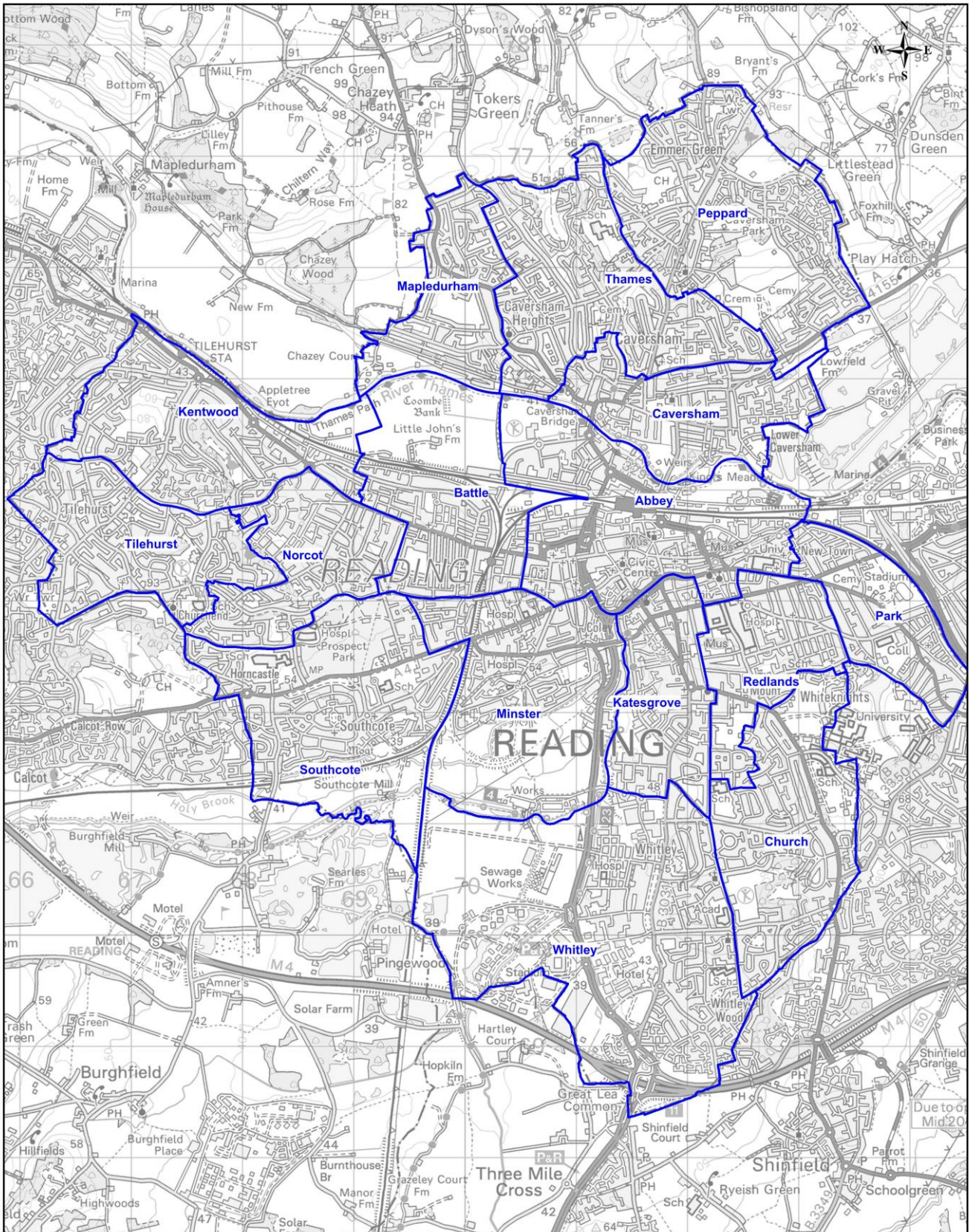
HM Revenue and Customs

HM Revenue and Customs
Excise Processing Teams
BX9 1GL
United Kingdom

Phone: 0300 322 7072 Option 7.

Email: NRUBetting&Gaming@hmrc.gsi.gov.uk

APPENDIX A - MAP OF READING BOROUGH



Title: Borough-wide Plan with Wards



Date: 18/08/2017 Scale at A3: 1:31,300

Produced by GI & Business Services

Ref: G:\MIWorkspaces\VR\GIS & Mapping\Borough Map A3

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APPENDIX B - TABLE OF DELEGATIONS OF LICENSING FUNCTIONS

MATTER TO BE DEALT WITH	FULL COUNCIL	SUB-COMMITTEE	OFFICERS
Approval of three year licensing policy	X		
Policy not to permit casinos	X		
Fee Setting - when appropriate			X (to be approved by Executive Councillor)
Application for premises licence (new, variation & transfer) and provisional statement		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Review of a premises licence		X	
Application for club gaming /club machine permits		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Cancellation of club gaming/ club machine permits		X	X (for non-payment of fee)
Applications for other permits			X
Cancellation of licensed premises gaming machine permits			X
Consideration of temporary use notice			X
Decision to give a counter notice to a temporary use notice		X	
Revocation of premises licence due to failure to pay annual fee			X
Registration of small society lotteries			X
Registration of small society lotteries			X

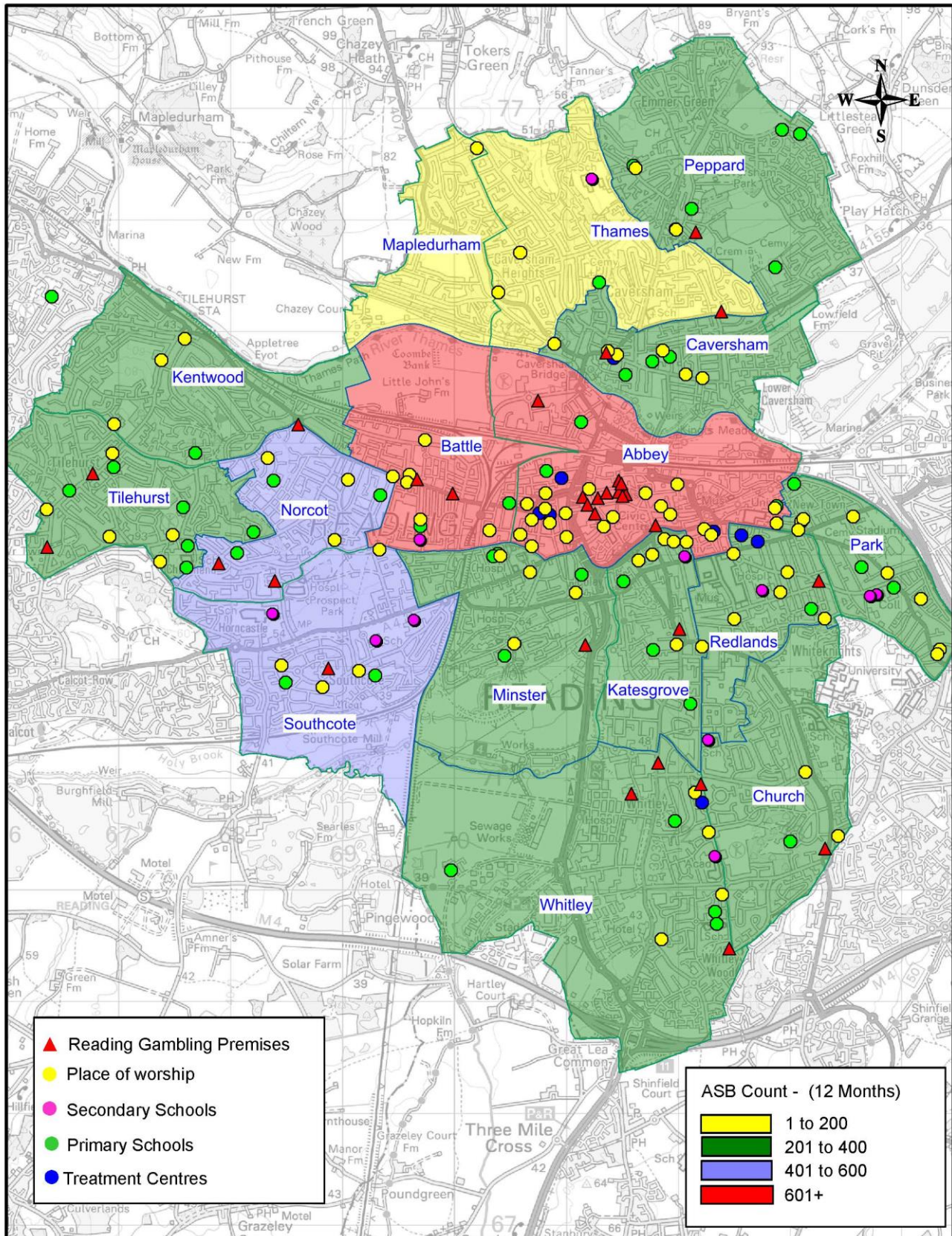
X indicates the lowest level to which decisions can be delegated

APPENDIX C - CATEGORY OF GAMING MACHINES

Type of Authorisation	Machine Categories Permitted						
	A	B1	B2	B3	B4	C	D
Betting (other) Premises Licence			Maximum of 4 machines Any combination from Categories B2/B3/B4/C/D				
Betting (track) Premises Licence			As Betting (other), but only if the licence-holder also holds a Pool Betting Operating Licence				
Bingo Premises Licence				20% of total gaming machines #		Unlimited	
Adult Gaming Centre Premises Licence				20% of total gaming machines #		Unlimited	
Family Entertainment Centre Premises Licence						Unlimited	
Family Entertainment Centre Gaming Machine Permit							Unlimited
Club Gaming Permit or Club Machine Permit				Maximum of 3 machines Members clubs - from Cat. B3a/B4/C/D Commercial clubs – from Cat. B4/C/D			
Alcohol-licensed premises Automatic entitlement						1-2 machines L.A. must be notified	
Alcohol-licensed premises Gaming Machine Permit						As allowed by permit	
Travelling funfair (no authorisation required)							Unlimited
Regional Casino Premises Licence	Maximum of 1250 machines (subject to a machine/table ratio) Any combination from Categories A/B1/B2/B3/B4/C/D						
Large Casino Premises Licence		Maximum of 150 machines (subject to a machine/table ratio) Any combination from Categories B1/B2/B3/B4/C/D					
Small Casino Premises Licence		Maximum of 80 machines (subject to a machine/table ratio) Any combination from Categories B1/B2/B3/B4/C/D					
Converted Casino Premises Licence		Maximum of 20 machines (no machine/table ratio) Any combination from Categories B1/B2/B3/B4/C/D					

Minimum age of 18 years to use Category A, B and C machines. No age limit on Category D machines.

APPENDIX D - LOCAL AREA PROFILE MAP



Title: Local Profile Map

Plan Ref: GIS00361

Produced by GIS & Mapping Services

Date: 29/09/2021

Scale at A4: 1:44,220

Ref: M:\ID\CD\Environment\Licensing\Reading Gambling Premises 2021

Reading
Borough Council
Working better with you

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Consultee - RBC
Environmental Protection
Env. Health (Health & Safety)
Planning
Childrens' Services (BFfC)
Trading Standards
Public Health
Consultee - Non-RBC
Gambling Commission
Thames Valley Police
Royal Berkshire Fire and Rescue
HMRC
Poppleston Allen
Environment Agency
Gamcare
Grosvenor Casinos
Genting Casinos
Admiral AGC
Little Vegas
Ladbrokes
Betfred
Coral
Paddy Power
BJ's Luxury Bingo
Betting and Gaming Council
British Bingo Association
British Beer & Pub Association
Association of Licensed Multiple Retailers (ALMR)
British Amusement & Catering Trades Association
British Institute of Innkeeping
Samaritans
Gamble Aware
Gamblers Anonymous (UK)
National PubWatch
Reading Citizens Advice
CGL Reading
Source
AA
East West Organisation
Friday Recovery Group Reading

Appendix RS-2

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Reading Borough Council

Summary of Responses to the Proposed Statement of Gambling Licensing Principles Consultation

Name of Respondent	Gosschalks LLP obo The Betting and Gaming Council
<p>Comments and Recommendations from Respondent:</p> <p>We act for the Betting and Gaming Council (BGC) and are instructed to respond on behalf of the BGC to your consultation on the review of your Gambling Act 2005 Statement of Principles.</p> <p><u>The Betting and Gaming Council</u></p> <p>The Betting and Gaming Council (BGC) was created in 2019 as the new standards body for the UK's regulated betting and gaming industry. This includes betting shops, online betting and gaming businesses, bingo and casinos. Its mission is to champion industry standards in betting and gaming to ensure an enjoyable, fair and safe betting and gaming experience for all of its members' customers.</p> <p>BGC members support 119,000 jobs and account for £4.5 billion to the Treasury annually in tax. Recent study also showed that BGC members contributed around £7.7 billion in gross value added to the UK economy in 2019. London's casinos alone contribute over £120 million to the tourism economy each year.</p> <p>The gambling industry is integral to the survival of sport. Betting companies spend over £40 million a year on the English Football League (EFL) and its clubs. Horse racing, an industry estimated to be worth £3.5 billion a year to the UK economy and which generates 85,000 jobs receives over £350 million per annum through the Horse Racing Industry Levy, media rights and sponsorship. Darts and Snooker receive in excess of £10 million per annum which represents 90 % of all sponsorship revenue.</p> <p>The BGC has four objectives. These are to -</p> <ul style="list-style-type: none"> • create a culture of safer gambling throughout the betting and gaming sector, with particular focus on young people and those who are vulnerable • ensure future changes to the regulatory regime are considered, proportionate and balanced • become respected as valuable, responsible, and engaged members of the communities in which its members operate • safeguard and empower the customer as the key to a thriving UK betting and gaming industry <p>Before we comment on your draft policy document, it is important that the backdrop against which the comments are made is established.</p>	

Betting and Gaming in the UK

Betting and gaming is widely enjoyed in the UK. Around 30 million people participate in some sort of gambling, whether that is on the National Lottery, placing a bet in betting shops, playing in casinos or at bingo. The overwhelming majority of these people do so safely without reporting any problems.

Any consideration of gambling licensing at the local level should also be considered within the wider context.

- the overall number of betting shops is in decline. The latest Gambling Commission industry statistics show that the number of betting offices (as of March 2020) was 7681. This is reducing every year and has fallen from a figure of 9137 in March 2014. Covid 19 had a devastating effect on the betting industry. The number of betting offices in June 2020 was down to 6461.
- planning law changes introduced in April 2015 have increased the ability of licensing authorities to review applications for new premises, as all new betting shops must now apply for planning permission.
- In April 2019 a maximum stake of £2 was applied to the operation of fixed odds betting terminals
- successive prevalence surveys and health surveys tells us that problem gambling rates in the UK are stable and possibly falling.

This consultation comes at a time when many BGC members with land-based premises are recovering from the devastating impact of the pandemic. Premises were closed for much of 2020 and throughout much of 2021. The casino sector, for example, was closed for over half of 2020 and for over half of 2021 (to date). The pandemic has put an enormous strain on the company balance sheets of casino operators.

Problem Gambling

Problem gambling rates are static or possibly falling. The reported rate of 'problem gambling' (according to either the DSM-IV or the PGSI) was 0.8% of the adult population in 2015, in 2016 it was 0.7% and in 2018 it was 0.5% of the adult population.

Figures published by the Gambling Commission in October 2021 show that the rate of problem gambling in the year to September 2021 was 0.3%, having fallen from 0.6% the previous year. The moderate risk rate has also decreased significantly to 0.7% in the year to September 2021 compared to 1.2% in the year to September 2020.

Rates of 'problem gambling' in the UK are low by international standards - compared to France (1.3%), Germany (1.2%), Sweden (2.2%) and Italy (1.27%).

The raft of measures that have been put in place recently both by the industry (in terms of protecting players from gambling-related harm), the Gambling

Commission and the Government (a ban on credit cards, restrictions to VIP accounts, new age and identity verification measures and voluntary restrictions on advertising) have contributed to problem gambling rates now being lower than they were at the passage of the 2005 Gambling Act.

Both the Gambling Commission and Government have acknowledged that problem gambling levels have not increased. It has reduced.

In June 2020, the BGC's five largest members committed to increasing the amount they spend on research, education and treatment (RET) services from 0.1 per cent to 0.25 per cent of their annual revenue in 2020, 0.5 per cent in 2021, 0.75 per cent in 2022 and 1 per cent in 2023. The five operators confirmed they will provide £100 million to GambleAware charity to improve treatment services for problem gamblers.

The BGC supported the creation of the new NHS gambling treatment clinics who have promised 22 clinics, 3 of which are open now. We are pleased that the NHS have committed to work to increase the number of clinics in the UK in addition to existing services delivered by Gordon Moody Association and GamCare's 120 treatment centres located throughout the UK.

The BGC also recognises the Gambling Commission's National Strategy as a way of accelerating progress on responsible gambling and tackling problem gambling. Our members are fully committed to meeting this challenge and are working to deliver new responsible gambling initiatives including technology that tackles problem gambling and increased funding for problem gambling clinics.

Differentiation between Licensing Act 2003 and Gambling Act 2005 applications

When considering applications for premises licences, it is important that a clear distinction is made between the regimes, processes and procedures established by Gambling Act 2005 and its regulations and those that are usually more familiar to licensing authorities - the regimes, processes and procedures relating to Licensing Act 2003.

Whilst Licensing Act 2003 applications require applicants to specify steps to be taken to promote the licensing objectives, those steps being then converted into premises licence conditions, there is no such requirement in Gambling Act 2005 applications where the LCCP provide a comprehensive package of conditions for all types of premises licence.

It should continue to be the case that additional conditions in Gambling Act 2005 premises licence applications are only imposed in exceptional circumstances where there are clear reasons for doing so. There are already mandatory and default conditions attached to any premises licence which will ensure operation that is consistent with the licensing objectives. In the vast majority of cases, these will not need to be supplemented by additional conditions.

The LCCP require that premises operate an age verification policy. The industry operates a policy called “Think 21”. This policy is successful in preventing under-age gambling. Independent test purchasing carried out by operators and submitted to the Gambling Commission, shows that ID challenge rates are consistently around 85%.

When reviewing draft statements of principles in the past, we have seen statements of principles requiring the operation of Challenge 25. Unless there is clear evidence of a need to deviate from the industry standard then conditions requiring an alternative age verification policy should not be imposed.

The BGC is concerned that the imposition of additional licensing conditions could become commonplace if there are no clear requirements in the revised licensing policy statement as to the need for evidence. If additional licence conditions are more commonly applied this would increase variation across licensing authorities and create uncertainty amongst operators as to licensing requirements, over complicating the licensing process both for operators and local authorities.

Working in partnership with local authorities

The BGC is fully committed to ensuring constructive working relationships exist between betting and gaming operators and licensing authorities, and that where problems may arise that they can be dealt with in partnership. The exchange of clear information between councils and betting and operators is a key part of this and the opportunity to respond to this consultation is welcomed.

Considerations specific to the draft statement of Gambling Licencing Principles January 2022.

We welcome the statement in paragraph 9.2 that the presumption upon application will be to grant the application without conditions and that conditions will only be considered where they are needed to take cognisance of the licensing objectives/LCCP/guidance. The final part of this paragraph, however, should be redrafted. This states that applicants are required to demonstrate how they will mitigate risks both within the local area risk assessment *“and the submission of conditions if deemed appropriate.”*

This suggestion that an applicant is to suggest its own conditions should be deleted. Whereas this is a fundamental part of the licensing process within applications under Licencing Act 2003, under Gambling Act 2005 there is no process, expectation or requirement for an applicant to “suggest conditions.”

Response from Licensing Authority:

Paragraph 9.2 of our draft policy states *‘It is required for applicants to demonstrate how they will mitigate the risks within their local area and this should be done via a local area risk assessment and the submission of conditions if deemed appropriate’*. The above comments have been considered and no change to the draft policy will be made because the section in bold, above, only

requires an applicant to propose conditions where they have identified that they are appropriate due to a particular risk that is not mitigated by any mandatory or default conditions.

All Gambling Act 2005 premises licences are subject to mandatory and default conditions which are designed to be, and usually are, sufficient to ensure operation which is reasonably consistent with the licensing objectives. The section headed 'General Principles' should be clear that additional conditions will only be imposed where there is clear evidence of a risk to the licensing objectives in the circumstances of a particular case which is not already adequately addressed by the policies, procedures and mitigation measures described in an applicant's risk assessment.

Response from Licensing Authority:

Following the comments above, paragraph 9.2 has been amended to confirm that mandatory and default conditions usually the only conditions required to be attached to a licence, however, in particular cases of risk to the licensing objectives, additional conditions will be attached to mitigate those risks.

It is important that the policies, procedures and mitigation measures to address risks identified by the risk assessment are dealt with via that document rather than by way of licence conditions as the risk assessment is a dynamic document which (in accordance with SR Code provision 10.1.2) must be reviewed if there is a significant change in local circumstances. As risks change or new risks are identified, the policies, procedures and mitigation measures to address those identified risks may be changed very quickly. However, if the mitigation measures are the subject of premises licence conditions, then an application for variation of the premises licence will be required to change those conditions. This could delay any change and would cause unnecessary expense and administration for both operators and the licensing authority.

The heading to section 10 refers to 'Primary Gambling Activity.' This is a term which is no longer used by the Gambling Commission and this heading (and indeed and the contexts of section 10 should be amended to reflect this).

The Gambling Commission now uses the term 'appropriate licensing environment' and section 10 needs to do no more than state the requirements of SR Code provision 9.1. This requires (in so far as betting premises are concerned) that gaming machines may be made available for use where there are also substantive facilities for non-remote betting provided and available in the premises.

Response from Licensing Authority:

Following the comments above, section 10 has been amended to remove an erroneous statement that the term 'Primary Gambling Activity' is used in the Gambling Commissions guidance and Licence Conditions and Code of Practice as this is no longer the case. We maintain, however, that the term remains in our policy as it is still an important principle, with the terminology being easy to understand.

11.1.2 ('Local area profile and local area risk assessment') indicates that applicants will be expected to demonstrate how their operations shall not exacerbate issues of anti-social behaviour in the locality or undermine the licensing objectives. This first sentence of this paragraph should be redrafted as that is not the requirement under Gambling Act 2005. An applicant is required to show how the proposed operation would be reasonably consistent with the licensing objectives and conduct a risk assessment to identify risks to the licensing objectives and state policies, procedures, mitigation measures to address those risks. It is not a requirement to show how an operation shall not exacerbate issues of anti-social behaviour. In any event, as recognised by paragraph 12.3, low level anti-social behaviour is an issue of nuisance which is not relevant to any consideration of risk to the licensing objectives under Gambling Act 2005. Accordingly, paragraph 11.1.2 should be redrafted.

Response from Licensing Authority:

Anti-social behaviour is not a licensing condition under the Gambling Act 2005, as it is under the Licensing Act 2003, however, we believe it is important for an applicant to recognise any anti-social behaviour problems in the locality of their proposed operation in order to not exacerbate the problem, especially if in the circumstances of any case public nuisance may be tantamount to crime and/or disorder, which is a licensing objective under the Gambling Act 2005.

Section 28 (relationships with planning polices) should also be redrafted. The final sentence indicates that applicants should have regard to the Reading Central Area action plan and the issue of clustering in relation to betting premises. The Gambling Act 2005 (s210) is clear that the licensing authority shall not have regard to whether a proposal by an applicant is likely to be permitted in accordance with the law relating to planning or building. On the basis that planning permission cannot be a consideration of the licensing authority when considering an application for grant of a gambling premises licence then there should be no reference to this within the policy. Accordingly, the final sentence of Section 28 should be deleted.

Response from Licensing Authority:

Section 28 recognises that matters of Building Control and Planning are dealt with separately to the Licensing function. This section merely advises applicants that they should regard other Reading Borough Council policies or strategies when applying for a licence. No decision of the Licensing authority will take regard of whether or not a proposal by the applicant is likely to be permitted in accordance with the law relating to Planning or Building Control.

Conclusion

On behalf of the BGC, we thank you for the opportunity to comment on your draft statement of principles and hope that these comments above are useful. The BGC will work with you to ensure that its members' operation of its premises will operate in accordance with the licensing objectives.

Name of Respondent	GamCare
Comments and Recommendations from Respondent:	
<p>Thank you for reaching out to GamCare with your local authorities new draft principles. This helps to ensure that gambling activity is conducted safely and with due diligence in your area</p> <p>Across the UK, 335,000 people are classed as problem gamblers and a further 2.5 million at risk across the UK. It's also estimated that there are 5 million people are affected by someone else's gambling. As a cross cutting social issue that impacts housing, homelessness, community safety and families, gambling is estimated to cost the UK £1.2bn per year. GamCare has services that can address the problems in your borough.</p> <p>As the leading provider of treatment, education, advice and support for anyone affected by problem gambling, GamCare is uniquely positioned to support local authorities by developing integrated and tailored strategies to address problem gambling in your area by providing:</p> <ul style="list-style-type: none"> • Increased accessibility to leading treatment services in your area • Bespoke guidance for Local Authorities • Ensuring the highest independent quality standards for gambling businesses with our Safer Gambling Standard • Targeted support to those most at risk from gambling harms • A range of training, consultancy, auditing and engagement services for both local authorities and the gambling industry <p>With representatives all around the UK, GamCare has the knowledge and expertise to work with and assist frontline services in your area to provide targeted support and assist with referrals.</p> <p>In January, we will be updating our offer for local authorities.</p> <p>For more detail on how we can support you, email: policy@gamcare.org.uk. You can also visit our website here: www.gamcare.org.uk</p> <p>Response from Licensing Authority:</p> <p>This response contains no recommendations.</p>	

Name of Respondent	GamCare
Comments and Recommendations from Respondent:	
<p>Thank you for consulting us on your draft Statement of Principles under the Gambling Act 2005.</p> <p>Due to resource constraints on a small charity, we are not able to offer specific feedback on your policy. However, you may find GambleAware's recently published interactive maps useful, which have been designed for use by local authorities. The maps show the prevalence of problem gambling severity in each local authority and ward area as well as usage of, and reported demand for, treatment and support for gambling harms.</p> <p>GambleAware also strongly commends two publications by the Local Government Association which set out the range of options available to local authorities to deal with gambling-related harms using existing powers:</p> <ul style="list-style-type: none"> • https://www.local.gov.uk/tackling-gambling-related-harm-whole-council-approach • https://www.local.gov.uk/gambling-regulation-councillor-handbook-england-and-wales <p>GambleAware is also fully supportive of local authorities which conduct an analysis to identify areas with increased levels of risk for any reason. In particular we support those who also include additional licence requirements to mitigate the increased level of risk. Areas where there are higher than average resident or visiting populations from groups we know to be vulnerable to gambling harms include children, the unemployed, the homeless, certain ethnic-minorities, lower socio-economic groups, those attending mental health (including gambling disorders) or substance addiction treatment services.</p> <p>Finally, GambleAware is a leading commissioner of prevention and treatment services for gambling harms. It provides these functions across England, Scotland and Wales and its work is underpinned by high quality research, data and evaluation. We encourage all local authorities to signpost people to the National Gambling Helpline on 0808 8020 133 and also www.begambleaware.org. Both are part of the National Gambling Treatment Service and offer free, confidential advice and support for those who may need it.</p>	
Response from Licensing Authority:	
<p>Following the comments above, we have added paragraph 11.1.6 which references that there is publicly available data and that we would expect applicants to take cognisance of this resource to assist in the creation of their local area risk assessment.</p>	

Project / Proposal Name or Reference:		Date:	Your Name:	
Statement of Gambling Licensing Principles				
1. IMPACT ON CARBON EMISSIONS				
HOW WILL THIS PROJECT/PROPOSAL AFFECT:	CONSIDERATIONS <i>See guidance below on determining whether negative or positive impacts are High, Medium or Low</i>	IMPACT? <i>Use drop down list</i>	GUIDANCE IF NEGATIVE/NIL RATING HAS BEEN AWARDED	SUMMARISE HOW YOU PLAN TO MANAGE AND REDUCE ANY NEGATIVE IMPACTS
1 ENERGY USE	<ul style="list-style-type: none"> * More energy will be consumed or emissions generated (by RBC or others) = Negative Impact * No extra energy use is involved or any additional energy use will be met from renewable sources = Nil Impact * Energy use will be reduced or renewable energy sources will replace existing fossil fuel energy = Positive Impact 	Nil	Consider: - Energy efficiency measures - Renewable energy - Reducing demand for energy	It is not envisaged that, as a result of this policy, more energy will be consumed or emissions generated than there currently is. There are no statutory grounds under the Gambling Act 2005 to consider climate or environmental impacts.
2 WASTE GENERATION	<ul style="list-style-type: none"> * More waste will be generated (by RBC or others) = Negative Impact * No waste will be generated = Nil Impact * Less waste will be generated OR amount of waste that is reused/ recycled will be increased = Positive Impact 	Nil	Consider: - Re-usable/recycled goods - Recycling facilities - Reducing/reusing resources	N/A
3 USE OF TRANSPORT	<ul style="list-style-type: none"> * RBC or others will need to travel more OR transport goods/people more often/further = Negative Impact * No extra transport will be necessary = Nil Impact * The need to travel, the use of transport and/or of fossil fuel-based transport will be reduced = Positive Impact 	Nil	Consider: - Use of public transport - Reducing need to travel or transport goods - Alternative fuels/electric vehicles/walking and cycling	A lot of premises are in the town centre. Many people attend the town centre by public transport. It is not envisaged that many people will attend the town centre by vehicle in order to attend a gambling premises, specifically.
2. IMPACT ON RESILIENCE TO THE EFFECTS OF CLIMATE CHANGE				
HOW WILL THIS PROJECT/PROPOSAL AFFECT THE ABILITY OF READING TO WITHSTAND:	CONSIDERATIONS <i>See guidance below on determining whether negative or positive impacts are High, Medium or Low</i>	IMPACT? <i>Use drop down list</i>	GUIDANCE IF NEGATIVE/NIL RATING HAS BEEN AWARDED	SUMMARISE HOW YOU PLAN TO MANAGE AND REDUCE ANY NEGATIVE IMPACTS
4 HEATWAVES	<ul style="list-style-type: none"> * Increased exposure of vulnerable people and/or infrastructure to heat stress = Negative Impact * No increase in exposure to heat stress = Nil Impact * Reduced exposure of vulnerable people and/or infrastructure to heat stress = Positive Impact 	Nil	Greater need for cooling, ventilation, shading and hydration methods	N/A
5 DROUGHT	<ul style="list-style-type: none"> * Water use will increase and/or no provision made for water management = Negative Impact * Levels of water use will not be changed = Nil Impact * Provision made for water management, water resources will be protected = Positive Impact 	Nil	Greater need for water management and perhaps reserve supplies	N/A
6 FLOODING	<ul style="list-style-type: none"> * Levels of surface water run-off will increase, no management of flood risk = Negative Impact * Levels of surface water run-off & flood risk are not affected = Nil Impact * Sustainable drainage measures incorporated, positive steps to reduce & manage flood risk = Positive Impact 	Nil	Consider flood defence mechanisms or alternative arrangements (business continuity)	N/A
7 HIGH WINDS / STORMS	<ul style="list-style-type: none"> * Exposure to higher wind speeds is increased or is not managed = Negative Impact * No change to existing level of exposure to higher wind speeds = Nil Impact * Exposure to higher wind speeds is being actively managed & reduced = Positive Impact 	Nil	Greater need for stabilisation measures, robust structures resilient to high winds	N/A
8 DISRUPTION TO SUPPLY CHAINS	<ul style="list-style-type: none"> * Exposure to supply chain disruption for key goods and services is increased = Negative Impact * No change in exposure to supply chain disruption for key goods and services = Nil Impact * Exposure to supply chain disruption for key goods and services is reduced = Positive Impact 	Nil	Source key goods and services locally as it reduces exposure to supply chain disruption and boosts the local economy	N/A
Weighing up the negative and positive impacts of your project, what is the overall rating you are assigning to your project?:		Net Nil	<i>This overall rating is what you need to include in your report/ budget proposal, together with your explanation given below.</i>	

Guidance on Assessing the Degree of Negative and Positive Impacts:

Note: Not all of the considerations/ criteria listed below will necessarily be relevant to your project

Low Impact (L)	<ul style="list-style-type: none"> * No publicity * Relevant risks to the Council or community are Low or none * No impact on service or corporate performance * No impact on capital assets; or relates to minor capital assets (minor works)
Medium Impact (M)	<ul style="list-style-type: none"> * Local publicity (good or bad) * Relevant risks to the Council or community are Medium * Affects delivery of corporate commitments * Affects service performance (e.g.: energy use; waste generation, transport use) by more than c.10% * Relates to medium-sized capital assets (individual buildings or small projects)
High Impact (H)	<ul style="list-style-type: none"> * National publicity (good or bad) * Relevant risks to the Council or community are Significant or High * Affects delivery of regulatory commitments * Affects corporate performance (e.g.: energy; waste; transport use) by more than c.10% * Relates to major capital assets (larger buildings and infrastructure projects)

In the box below please summarise any relevant policy context, explain how the overall rating has been derived, highlight significant impacts (positive and negative) and explain actions being taken to mitigate negatives and increase positives. This text can be replicated in the 'Environment and Climate Impacts' section of your Committee Report, though please note you may need to supplement this climate impact

There are no specific environmental or climate implications to this policy. There are currently 33 licensed premises, of which, 27 are of small retail unit size and 6 are larger buildings (casinos, bingo hall & adult gaming centre). It is not envisaged that any premises that fall under this policy will negatively impact the following to any significant degree: air quality, biodiversity, wildlife, green space, natural habitats, landscape/visual impact, natural resources, noise pollution, waste/waste management. Furthermore, no significant increase in emissions of greenhouse gases/ carbon dioxide are expected. It is not possible to predict how the total number of premises, nor the number of customers to such premises will fluctuate over the next 3 years of the proposed policy, however, there has been a decrease of 3 licensed premises throughout the current policy period. There has also been an increase in the number of remote gambling activity (gambling online via computer, smartphone etc)

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