

# Camden Statement of Principles Gambling Act 2005

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# Camden's Statement of Principles under the Gambling Act 2005

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**Foreword**

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## Introduction, Background and Definitions

1. This Statement of Principles ('Policy') provides the broad principles the Licensing Authority will apply when exercising its functions under the Gambling Act 2005 in respect of:-
  - enforcement and dealing with issues or concerns about premises licensed under the Act
  - guidance for applying for licences, permits and notices under the Act
  - making representations and consultation arrangements
  - attending Licensing Sub Committee hearings.
2. These documents provide specific details about the gambling regime for residents and the trade to assist in understanding their rights and responsibilities. Copies of these documents are available on the Camden website [www.camden.gov.uk/licensing](http://www.camden.gov.uk/licensing), or can be mailed by contacting the Planning and Public Protection Service. Contact details are on the back cover of this policy.
3. This Statement of Principles applies to the following types of premises:
  - Adult Gaming Centres
  - Licensed Family Entertainment Centres
  - Casinos
  - Bingo
  - Betting Premises
  - Tracks
  - Provisional Statements
  - Temporary Use Notices
  - Occasional Use Notices
  - Travelling Fairs

### Overview of the Gambling Regime

4. This section provides a summarised overview of the gambling regime for background and information only. This section does not form part of Camden's Statement of Licensing Principles.
5. The Gambling Act was passed in April 2005, and came into force in September 2007. It consolidated previous gambling legislation into one Act, covering most categories of gaming activities. The Gambling Act also established a new gambling body, the Gambling Commission, to license gambling operators, and gave Local Authorities new powers to license gambling premises.
6. Premises Licences have standard Mandatory and Default Conditions which are determined by regulations, and apply automatically to a premises when a licence is issued. Mandatory conditions cannot be removed from the licence, while default conditions can be removed or

modified subject to an application. The Mandatory and Default Conditions depend on the type of premises licence, and can include permitted operating hours and restrictions on access to the premises by under 18's.

### **The Licensing Objectives**

7. The Gambling Act Licensing Objectives underpin the functions that the Gambling Commission and Licensing Authorities perform under the Gambling Act. This Statement of Licensing Principles has been written with a view to promoting these objectives.
8. The Gambling Act Licensing Objectives 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 conducted in a fair and open way; and
  - Protecting children and other vulnerable persons from being harmed or exploited by gambling.
9. Further details on the Licensing Objectives can be found in paragraphs 31 to 43.

### **The Gambling Commission**

10. The Gambling Commission issue Operator and Personal Licences to gambling operators and individuals who provide facilities for gambling. It also has responsibilities to regulate gaming machine manufacturers/suppliers and online gaming operators. In undertaking its licensing responsibilities, the Gambling Commission is primarily concerned with the following areas in relation to gambling:
  - Financial robustness – ensuring there are procedures relating to protection of customer funds, cash handling and money laundering.
  - Protection of children and vulnerable persons – ensuring policy and procedures are in place relating to social responsibility, age and credit card verification, repetitive play and self-exclusion.
  - Fair and open play – ensuring gaming complies with relevant legislation around fair gaming, games rules, voiding, late bets and maximum payouts.
  - Marketing – ensuring there is compliance with advertising codes of practice and rules around provision of alcohol and gaming.
  - Dispute resolution – ensuring operators keep records of complaints and disputes
  - Employees of gambling premises – covering issues of training, fraternisation between employees and customers, tipping and gambling by employees.

11. The Gambling Commission shares enforcement responsibilities with Licensing Authorities. It also issues guidance and Codes of Practice to which Licensing Authorities and operators must have regard. Along with the Commission, the Department for Culture, Media and Sport also has a responsibility for some aspects of the regime. This is primarily around revision and introduction of regulations, producing general information about the Act, and amending legislation as required.

### **Licensing Authority Functions**

12. Licensing Authorities key functions are to:
- license premises where gambling activities are to take place by issuing *Premises Licences*
  - issue *Provisional Statements*
  - regulate *members' clubs* and *miners' welfare institutes* who wish to undertake certain gaming activities via issuing Club Gaming Permits and/or Club Machine Permits
  - issue *Club Machine Permits* to *Commercial Clubs*
  - grant permits for the use of certain lower stake gaming machines at *unlicensed Family Entertainment Centres*
  - receive notifications from alcohol licensed premises (under the Licensing Act 2003) for the use of two or fewer gaming machines
  - issue *Licensed Premises Gaming Machine Permits* for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where there are more than two machines
  - register *small society lotteries* below prescribed thresholds
  - issue *Prize Gaming Permits*
  - receive and Endorse *Temporary Use Notices*
  - receive *Occasional Use Notices*
  - provide information to the Gambling Commission regarding details of licences issued
  - maintain registers of the permits and licences that are issued under these functions

### **Licensing Authority Principles**

13. The Gambling Act provides principles that Licensing Authorities must apply when discharging their responsibilities under the Act. Accordingly, the Licensing Authority shall aim to permit the use of premises for gambling in so far it considers it to be:
- in accordance with any code of practice issued by the Gambling Commission
  - in accordance with any relevant guidance issued by the Gambling Commission
  - reasonably consistent with the licensing objectives
  - in accordance with this Statement of Principles.

14. In exercising its functions under the Gambling Act, the Licensing Authority will endeavour to avoid duplication with other regulatory regimes as far as possible.

### **Declaration**

15. In producing this Statement of Principles, the Licensing Authority declares that it has had regard to the licensing objectives of the Gambling Act, the Guidance issued by the Gambling Commission, and any responses from those consulted on the Statement of Principles.
16. This Statement of Principles shall not override the right of any person to make an application, make representations about an application, or apply for a review of a licence, as each will be considered on its own merits and according to the statutory requirements under the Gambling Act.

### **Fees**

17. Fees will be collected from Gambling Operators to meet the costs of carrying out licensing functions under the Act. The intention of the government is that fees will cover the Licensing Authority's costs for administration (including hearings and appeals), inspection and enforcement of the licensing regime.

### **Authority to Advise on the Protection of Children from Harm**

18. The Licensing Authority is required by the regulations to state the principles it will apply in exercising its powers under Section 157(h) of the Gambling Act to designate, in writing, a body that is competent to advise the Licensing Authority about the protection of children from harm. These are:
  - the need for the body to be responsible for an area covering the whole of the Licensing Authority's area; and
  - the need for the body to be answerable to democratically elected persons, rather than a particular vested interest group.
19. The Licensing Authority has designated the Camden Safeguarding Children Board as competent to advise on issues concerning the protection of children from harm.

### **Information exchange**

20. The Licensing Authority will act in accordance with the provisions of the Gambling Act in its exchange of information which includes the provision that the Data Protection Act 1998 will not be contravened. The Licensing Authority will have regard to any guidance issued by the Gambling



Commission or Information Commissioner, in addition to any relevant regulations issued by the Secretary of State under the powers provided in the Gambling Act.

21. Any protocols established relating to information exchange with other bodies will be made available when produced.

### **Consultation and Approval of the Statement of Principles**

22. Consultation on Camden's Statement of Licensing Principles under the Gambling Act 2005 commenced on 31 July 2009 and finished on 11 September 2009. The consultation was conducted in accordance with the Revised Code of Practice and the Cabinet Office Guidance.
23. Local Authorities are required by law to consult on their policies. Broadly, the Licensing Authority consultation included the following groups:
  - The Chief Officer of Police
  - Camden's Safeguarding Children Board
  - Camden Residents, Resident associations and Councillors
  - Trade Associations and businesses who hold Premises Licences
  - Responsible Authorities
  - Community and faith organisations and those working with problem gamblers and young people; and
  - Neighbouring Licensing Authorities.
  - A summary of comments made on the Statement of Principles and their consideration by the Licensing Authority is available on request by contacting the Licensing Authority.
24. This Statement of Principles was approved at a meeting of the Licensing Authority on **XX XXX 2012** and adopted on **XX XXX 2012** at a meeting of the Full Council. It was published on the Camden website [www.camden.gov.uk/licensing](http://www.camden.gov.uk/licensing) on (14 January 2013 – **subject to adoption**). This Statement of Principles is effective from (31<sup>st</sup> January 2013 – **subject to adoption**). The Licensing Authority use this Statement of Principles in determining all applications made under the Gambling Act 2005.

### **Geographical Area Covered by the Statement of Principles**

25. This Statement of Principles applies to the London Borough of Camden, which covers approximately 22 square kilometres and has an estimated population in 2010 of 235,400. A map of the London Borough of Camden and the areas covered by the Statement of Principles can be found at Appendix 1.

## Casino Resolution

N.B. This section is from the current 2010 to 2013 Policy for reference, and will be updated according to the outcome of any new resolution that is proposed.

26. Camden have passed a 'no casino' resolution on the basis of resident opposition to new casinos. A Camden Talks Survey of approximately 1200 Camden residents showed 66% in opposition of new casinos in Camden. In the consultation carried out between July and September 2009, 100% of respondents who responded on this point indicated they were opposed to new casinos opening in Camden.
27. This resolution comes into effect on 18 December 2009 following agreement by the Full Council.
28. The resolution does not affect existing casinos, which will operate with a premises licence classed as a "Pre-2005 Act" casino. These casinos shall not have the entitlement of new casinos created by the Gambling Act.
29. Potential licence applicants should note that as a 'no-casino' resolution has been passed by this authority no applications for casino premises licences will be considered. Any applications received will be returned with a notification that a 'no-casino' resolution is in place.

### Key Terms and Definitions

30. The following are key terms and definitions that are referred to throughout this Statement of Principles:

**The Act** – The Gambling Act 2005

**The Commission** – The Gambling Commission

**DCMS** – The Department of Culture, Media and Sport

**The Guidance** – The Guidance to Licensing Authorities issued by the Gambling Commission.

**Licensing objectives** – as defined in paragraph 7

**Licensing Authorities** – a generic term given to the bodies that administer licensing functions within a particular area. For example, the Licensing Authority is the Licensing Authority for Camden. Unless explicitly stated, the term will relate to the Licensing Authority under the Gambling Act.

**Licensing Panel** – the Sub Committees established under section 10 of the Licensing Act 2003 in their capacity to determine premises licences under the Gambling Act 2005.

**Interested Party** – as defined in paragraphs 47 to 49

**The Policy** – The Statement of Principles prepared under section 349 of the Gambling Act (i.e. this policy document)

**Mandatory / Default Conditions** – conditions which attached to a gambling premises licence. Mandatory Conditions are set by the Government / Gambling Commission and must be included on Premises Licence by statute. Default conditions are also set by the Government / Gambling Commission, however the Licensing Authority has some discretion to amend them, for example opening hours of the premises.

**Premises** - Means any place, and includes a vehicle, vessel or moveable structure. A single building can 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. This approach has been taken to allow large, multiple unit premises such as a pleasure park, pier, track or shopping mall to obtain discrete Premises Licences, where appropriate safeguards are in place. However, Licensing Authorities should pay particular attention if there are issues about sub-divisions of a single building or plot and should ensure that Mandatory Conditions relating to access between premises are observed.

The Gambling Commission states in the third edition of its Guidance to Licensing Authorities that: “In most cases the expectation is that a single building / plot will be the subject of an application for a licence, for example, 32 High Street. But, that does not mean 32 High Street cannot be the subject of separate premises licences for the basement and ground floor, if they are configured acceptably. Whether different parts of a building can properly be regarded as being separate premises will depend on the circumstances. The location of the premises will clearly be an important consideration and the suitability of the division is likely to be a matter for discussion between the operator and the licensing officer. However, the Commission does not consider that areas of a building that are artificially or temporarily separated, for example by ropes or moveable partitions, can properly be regarded as different premises.”

The Licensing Authority takes note of the Gambling Commission’s Guidance to Licensing Authorities which states that: Licensing Authorities should take particular care in considering applications for multiple licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular they should be aware of the following:

The third licensing objective seeks to protect children and vulnerable people from being harmed by gambling. In practice, that means not only

preventing them from taking part in gambling, but also preventing them from being in close proximity to gambling. Therefore premises should be configured with particular regard to children so they are not invited to participate in, have accidental access to, or closely observe gambling where they are prohibited from participating.

Entrances to and exits from parts of a building covered by one or more premises licences should be separate and identifiable so that the separation of different premises is not compromised and people do not “drift” into a gambling area. In this context it should normally be possible to access the premises without going through another licensed premises or premises with a permit.

Customers should be able to participate in the activities named on the Premises Licence.

The Guidance also gives a list of factors which the Licensing Authority should be aware of, which may include:

- whether the premises are registered separately for business rates
- whether neighbouring premises are owned by the same person or not
- whether each of the premises can be accessed from a street or public passageway
- whether the premises can only be accessed from another gambling premises

The Licensing Authority will consider these and other relevant factors in making its decision, depending on the circumstances of the case.

Part 7 of the Gambling Commission’s Guidance to Licensing Authorities contains further guidance on this issue, which this authority will also take into account in its decision-making.

**Regulations** – means Regulations made under the Gambling Act 2005

**Responsible Authority** - for the purposes of the Gambling Act 2005, the following are Responsible Authorities in relation to premises:

- the Gambling Commission
- the Chief Officer of Police
- London Fire Brigade
- Planning
- Environmental Health
- Camden’s Safeguarding Children Board (refer to paragraph 19)
- HM Revenues and Customs.

## Section 1: The Licensing Objectives

### Crime and Disorder Objective

31. The Gambling Commission will play a lead role in preventing gambling from being a source of crime. It will maintain rigorous licensing procedures that aim to prevent criminals from providing facilities for gambling, or being associated with providing such facilities. The Gambling Commission have powers to investigate the suitability of applicants for operating and personal licences, and others relevant to the application.
32. In determining appropriate conditions under the crime and disorder objective, the following conditions will be considered, where relevant to the application:-
- measures/actions to address crime and disorder issues around the design, layout or the look and feel of the premises. This may include steps to 'design out crime' such as changing layout, positioning of registers, CCTV, lighting etc
  - measures to address the reoccurrence of any historical crime and disorder issues
  - changes to opening hours, where it is felt that amending them would address or reduce the specific concern around crime and disorder
  - whether the licensee should participate in any relevant council strategy that relates (or have aspects relating) to crime and disorder
  - whether training should be given to staff around crime prevention measures appropriate to the premises
  - where premises are subject to age restrictions, whether additional procedures or measures could be put in place to conduct age verification checks, better supervision of entrances/age restricted machines, or to ensure there is better segregation between age restricted areas of the premises
  - whether the premises has door supervisors or security
  - where, if the licence or variation is granted, if there is a likelihood that the grant will result in violence, public disorder or policing problems.
- 
- This list is not exhaustive, but merely indicates the types of conditions or measures around crime and disorder the Licensing Authority may consider.
33. The Guidance provides that Licensing Authorities may not consider issues in relation to nuisance or public safety when determining applications for Premises Licences and that these matters must be addressed through other legislation. Where a nuisance or public safety

issue is raised, the Licensing Authority will ensure that the concern is referred to the relevant statutory authority to ensure that the matter is addressed under the appropriate legislation/enforcement regime.

34. The Guidance provides that disorder is intended to be something that is more serious or disruptive than mere nuisance (which cannot be considered). When considering whether a situation is disorder or nuisance, the Licensing Authority will consider factors such as whether Police assistance was required, and how threatening the behaviour was to those who witnessed it.

### **Protection of Children and Vulnerable People Objective**

35. This licensing objective will be explained in two sections – children and vulnerable people.

#### Children

36. The Licensing Authority notes the Gambling Commission's Guidance that this objective means preventing children from taking part in gambling (as well as the restriction of advertising so that gambling products are not aimed at, or are particularly attractive to, children).
37. The Licensing Authority will consider, as suggested in the Guidance, whether specific measures are required at particular premises, with regard to this licensing objective. For example, appropriate measures may include the supervision of entrances / machines, and/or the separation of certain areas etc.
38. The Licensing Authority will also ensure that where category C or above machines are on offer in premises to which children are admitted:
- all such machines are located in an area of the premises which is separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance
  - the premises is appropriately signed, indicating that access to that area is restricted to persons under the age of 18
  - only adults are admitted to the area where the machines are located
  - access to the area where the machines are located is supervised
  - the area where the machines are located is arranged so that it can be observed by the staff or the licence holder.

These considerations will also apply to premises including buildings where multiple premises licences are applicable.

**Note:** Separate requirements apply to Alcohol Licensed Premises that hold a Gaming Machine Permit - refer to paragraphs 91 to 100.

39. The Licensing Authority will pay particular attention to licence applications for premises near schools and / or areas where there may be a high concentration of children or families. In considering this, the Licensing Authority will base its decision on whether the proximity of the premises to the above is likely cause a breach of the licensing objectives and in addition to the controls the operator has in place to ensure there are no breaches.

#### Vulnerable People

40. The Licensing Authority does not seek to stop particular groups of adults from gambling in the same way that it seeks to stop children, but it will assume for regulatory purposes, that 'vulnerable persons' include:
- people who gamble more than they want to
  - people who gamble beyond their means; and
  - people who may not be able to make an informed or balanced decision about gambling due to a mental impairment, alcohol or drugs.
41. The Licensing Authority will pay particular attention to licence applications for premises near venues where, for example, Gamblers Anonymous groups (or similar) meet, residential homes and hospitals. In considering the above, the Licensing Authority will base its decision on whether the proximity of the premises to the vulnerable group is likely to cause a breach of the licensing objectives, in addition to the controls the operator has in place to ensure this objective is not breached.

#### **Ensuring Gambling is Conducted in a Fair and Open Way Objective**

42. The Guidance states, '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 of the gambling business, and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the Personal Licence'.
43. Generally the Licensing Authority will not need to concern itself with the suitability of a person applying for a premises licence, as that person will have to hold an operating licence from the Gambling Commission. Where concerns about a person's suitability or business practices arise the Licensing Authority will bring this to the attention of the Gambling Commission.

## Section 2: Premises Licences

### Licensing process

44. The Gambling Act provides the ability for people who are 'interested parties' (these are people who have business interests or live sufficiently close to the premises to be affected by how it operates) to make representations about applications for Premises Licences. There are also a number of Responsible Authorities we must consult, for example the Police and Camden's Safeguarding Children Board.
45. Generally, where a representation is received, and it relates to either the licensing objectives, matters in this Statement of Licensing Principles or the Gambling Commissions Codes or Practice or Guidance, the application will normally be referred to the Licensing Sub Committee for determination. In determining applications, guidance issued by the Gambling Commission provides that Licensing Authorities shall aim to permit the use of premises for gambling in so far as we consider it to be:
- in accordance with any relevant Code of Practice or guidance issued by the Gambling Commission
  - reasonably consistent with the licensing objectives
  - in accordance with the Licensing Authority's Statement of Licensing Principles.
46. Among other matters, the Guidance provides that Licensing Authorities may not consider the likely demand for the premises, whether or not the premises would be likely to get planning consent and objections based around moral concerns or dislike of gambling.

### Interested Parties

47. An Interested Party is defined in the Gambling Act as follows:  
'a person is an interested party in relation to an application for, or in respect of a Premises Licence if, in the opinion of the Licensing Authority...the person:-
- 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; or
  - c. represents persons who satisfy paragraphs a or b.'
48. Regulations require Licensing Authorities to set out the principles they will apply in exercising their powers under the Gambling Act to determine who is an interested party is. These principles are:
- each case will be decided on its own merits
  - a rigid rule in relation to decision making will not be applied; and
  - any relevant guidance issued by the Gambling Commission shall be considered



- in determining whether someone lives sufficiently close to a particular premises as to likely be affected by the authorised activities, or has business interests that may be affected, the Licensing Authority will take into account the:
    - a. size of the premises
    - b. nature of the premises
    - c. nature of the authorised activities taking place
    - d. distance of the premises from the person making the representation
    - e. potential impact of the premises and/or
    - f. the characteristics of the complainant. This is not the personal characteristics of the complainant, but the interests of the complainant, which may be relevant to the distance from the premises.
49. In accordance with the Guidance, 'business interests' has its widest possible interpretation and may include, for example, partnerships, charities, faith groups and medical practices.

### **Representations and Hearings**

50. Where a representation (or objection) is received from an Interested Party or a Responsible Authority, the application will normally be heard and determined by a Sub Panel of the Licensing Committee.
51. The Licensing Authority will not consider representations that:
  - are not made by an Interested Party or a Responsible Authority
  - are vexatious or frivolous, or
  - will "certainly not" influence the Authority's determination of the application
52. When considering if a representation will influence the determination of an application, the Licensing Authority will take into account the relevance of the representation to:
  - the application, and
  - the licensing objectives
53. An Interested Party wishing to be represented by another person or organisation must give the Licensing Authority notice in writing requesting to be represented by that person or organisation.
54. Interested Parties can make representations about licence applications, or apply for a review of an existing licence.
55. Trade associations, trade unions and residents' and tenants' associations can be interested parties, if they can demonstrate they are representing a member who lives sufficiently close to the premises, or is likely to be affected by the activities being applied for.

56. Councillors and MPs may also be interested parties. Elected Councillors may represent interested parties, subject to legal constraints, guidance and advice. Where a Councillor or MP is representing their constituents, the requirements of paragraph 53 do not apply.

### **Conditions**

57. Where a relevant representation is made under one of the licensing objectives, or the Licensing Authority intends to attach or exclude conditions under section 162(1) the Sub Panel of the Licensing Committee will consider whether conditions are required to ensure that the objective is promoted. Conditions attached to Premises Licences by the Licensing Authority will be proportionate to the circumstances which they seek to address and will be:
- relevant to the need to make the proposed building suitable as a gambling facility
  - directly related to the premises and type of licence applied for
  - fairly and reasonably related to the scale and type of premises
  - reasonable in all other respects.
58. Where there are specific risks or problems associated with a particular locality, or specific premises, or class of premises, the Licensing Authority will attach individual conditions to address these risks or problems. Such matters will be determined in the light of local circumstances on a case-by-case basis.
59. The Licensing Authority will also exclude default conditions where it is believed to be appropriate.
60. The Licensing Authority will not duplicate conditions/requirements that are attached to a Premises Licence by the Gambling Act, Gambling Commission Codes of Practice or Secretary of State (unless they are default conditions that may be substituted accordingly) or conditions attached to an Operators or Personal Licence.
61. The following are matters that operators are likely to be required to comply with by virtue of the Gambling Act, Regulations, Mandatory / Default Conditions and or Codes of Practice:
- Proof of Age schemes
  - CCTV
  - supervision of entrances / machine areas
  - physical separation of areas
  - whether the premises may hold a licence to provide alcohol
  - location of entry to the premises
  - notices / signage about under 18's not entering the premises
  - opening hours
  - self barring schemes and/or
  - provision of information leaflets / helpline number of gambling self help organisations.

However, where not covered by other requirements, the Licensing Authority may consider adding appropriate conditions that are considered relevant to the application. The above is not an exhaustive list.

### **Buildings with Multiple Licences**

62. Under the Act, no more than one Premises Licence can be issued to any one premises. A 'premises' are defined as 'any place', and therefore there is no reason why a single building could not be subject to more than one premises licence, providing they are for different parts of the building.
63. Different configurations may be appropriate under different circumstances, but the crux of the matter is whether the proposed premises are genuinely separate premises that merit their own licence.
64. If applications are received for multiple premises licences in a building, the Licensing Authority will make an assessment on whether the proposed premises are truly separate. If it is considered that the premises are not separate premises, or there is any doubt, then the applications will normally be referred to a licensing panel for determination.
65. When assessing if premises are separate, the Licensing Authority will take a range of factors into account. Depending on all the circumstances of the application these may include:
  - whether the premises are separately registered for business rates
  - whether the neighbouring premises are owned by the same person
  - whether each premises can be accessed from the street or a public passageway
  - whether the premises can only be accessed from another gambling premises
66. Where the Licensing Authority determines that multiple premises licences can be granted within a single building, then specific measures may be required to be included as conditions on the licences. Such measures may include:
  - the supervision of entrances
  - segregation of gambling from non-gambling areas, which may include the type and position of partitions and/or
  - the supervision of the premises and gaming machines

## **Betting machines**

67. Holders of a Betting Premises Licence are permitted (subject to the discretion of the Licensing Authority) to have betting machines. A betting machine is different from a gaming machine as it is designed or adapted for use to bet on real events. For example, some premises may have betting machines that accept bets on live events, such as horse racing as a substitute for placing a bet in person over the counter.
68. Licensing Authorities have powers to restrict the number of betting machines in certain premises. In determining the number of betting machines, the Licensing Authority will consider the nature of the machine and the circumstances by which they are made available. This may include:
- the size of the premises
  - the number of counter positions available for transactions; and/or
  - the number of staff to monitor the use of the machines by children and young persons or vulnerable people.
  - whether the machines have been, or are likely to be used in breach of the licensing objectives.

## **Matters that Licensing Authorities May Not Consider**

69. The Gambling Act and Guidance provides a number of matters that Licensing Authorities may not consider. These include:
- moral objections – a Licensing Authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area
  - planning – when determining an application, regard cannot, under the terms of the Gambling Act, be given to planning or building control permissions and/or any planning restrictions, refer to paragraphs 137 and 138
  - demand – Licensing Authorities must not take into account issues around the demand for gambling premises.

## **Conditions the Licensing Authority May Not Attach to Licences**

70. The Guidance provides a number of conditions Licensing Authorities may not attach to Premises Licences. These are:
- any condition on a Premises Licence which makes it impossible to comply with an Operating Licence condition
  - conditions relating to gaming machines categories, numbers, or method of operation
  - conditions which provide that membership of a club or body be required
  - conditions in relation to stakes, fees, winnings or prizes.

## Provisional Statements

71. Developers may wish to apply to this authority for provisional statements before entering into a contract to buy or lease property or land to judge whether a development is worth taking forward in light of the need to obtain a Premises Licence. There is no need for the applicant to hold an operating licence in order to apply for a provisional statement.
72. Section 204 of the Gambling Act provides for a person to make an application to the Licensing Authority for a provisional statement in respect of premises that they:
- expect to construct
  - expect to alter or
  - expect to acquire a right to occupy.
73. The process for considering an application for a provisional statement is the same as that for a Premises Licence application. The applicant is obliged to give notice of the application in the same way as applying for a Premises Licence. Responsible authorities and interested parties may make representations and there are rights of appeal.
74. In contrast to the Premises Licence application, the applicant does not have to hold, nor have applied for, an Operating Licence from the Gambling Commission (except in the case of a track) and they do not have to have a right to occupy the premises in respect of which their provisional application is made.
75. The holder of a provisional statement may then apply for a Premises Licence once the premises are constructed, altered or acquired. The Licensing Authority will be constrained in the matters it can consider when determining the Premises Licence application, and in terms of representations about Premises Licence applications that follow the grant of a provisional statement, no further representations from relevant authorities or interested parties can be taken into account unless:
- they concern matters which could not have been addressed at the provisional statement stage, or
  - they reflect a change in the applicant's circumstances.
76. In addition, the Licensing Authority may refuse the Premises Licence (or grant it on terms different to those attached to the provisional statement) only by reference to matters
- which could not have been raised by objectors at the provisional statement application stage;
  - which in the opinion of the Licensing Authority reflect a change in the operator's circumstances; or
  - where the premises has not been constructed in accordance with the plan submitted with the application. This must be a substantial change to the plan and the Licensing Authority notes that it can discuss any concerns it has with the applicant before making a decision.

## Reviews

77. A Premises Licence may be reviewed by the Licensing Authority or after application by an Interested Party or Responsible Authority. When determining whether or not to initiate a review, the Licensing Authority shall have regard to its licensing and gambling enforcement policy. This Policy sets out the Licensing Authority's approach to enforcing the law on gambling and licensing and was agreed by the Council on 23 October 2008. Copies of the Policy can be obtained by contacting the Licensing Authority.
78. Whether a review is carried out or not is a matter for the Licensing Authority to decide. In making this decision the Licensing Authority will consider whether the grounds of review:-
- are in accordance with any relevant code of practice or guidance issued by the Gambling Commission
  - are reasonably consistent with the Licensing Objectives and/or
  - are in accordance with this Statement of Principles.
79. The Licensing Authority will also consider whether the request for a review is frivolous, vexatious, will certainly not cause the Licensing Authority to alter/revoke/suspend the licence, or whether the request is substantially the same as previous representations or requests for review (i.e. it is repetitive).
80. The Licensing Authority can initiate a review of a particular premises licence, or a particular class of premises licence on the basis of any reason which it thinks is appropriate.
81. Once a valid application for a review has been received by the Licensing Authority, representations can be made by responsible authorities and interested parties during a 28 day period. This period begins seven days after the application was received by the Licensing Authority, who will publish notice of the application within seven days of receipt.
82. The Licensing Authority must carry out the review as soon as possible after the 28 day period for making representations has passed.
83. The purpose of the review will be to determine whether the Licensing Authority should take any action in relation to the licence. If action is justified, the options open to the Licensing Authority are:-
- add, remove or amend a licence condition imposed by the Licensing Authority;
  - exclude a default condition imposed by the Secretary of State or Scottish Ministers (e.g. opening hours) or remove or amend such an exclusion;
  - suspend the Premises Licence for a period not exceeding three months; and
  - revoke the Premises Licence.

84. In determining what action, if any, should be taken following a review, the Licensing Authority must have regard to the principles set out in section 153 of the Act, as well as any relevant representations.
85. In particular, the Licensing Authority may also initiate a review of a premises licence on the grounds that a premises licence holder has not provided facilities for gambling at the premises. This is to prevent people from applying for licences in a speculative manner without intending to use them.
86. Once the review has been completed, the Licensing Authority must, as soon as possible, notify its decision to:
- the licence holder
  - the applicant for review (if any)
  - the Commission
  - any person who made representations
  - the Chief Officer of Police or Chief Constable; and
  - Her Majesty's Commissioners for Revenue and Customs

Further guidance regarding the review process is available on our website [www.camden.gov.uk/licensing](http://www.camden.gov.uk/licensing).

### **Section 3: Permits and Notices**

87. The Gambling Act introduces range of permits for gambling, which are granted by Licensing Authorities. Permits are required when premises provide a gambling facility, but either the stakes and prizes are very low, or gambling is not the main function of the premises.
88. The Licensing Authority is responsible for issuing and receiving the following types of permit and notice:-
- Gaming Machine Permit
  - Prize Gaming Permit
  - Club Gaming and Club Machine Permit
  - Unlicensed Family Entertainment Centre Permit
  - Travelling Fairs
  - Temporary Use Notice
  - Occasional Use Notice

This section does not include specific details of the stakes and prizes for the various permits and minimal information regarding the numbers machines permitted, as this information may be changed by the government throughout the life of this Statement of Principles.

89. Gaming Machines are described by different categories according to the value of the maximum prize and the stake required to play. Generally, Category C machines are the type most commonly found in pubs, Category B machines can give a much higher prize and the permitted numbers are restricted in premises that can provide them, while Category D machines are the type commonly found in amusement arcades and have lower value prizes and stakes. Category A machines have no limits on prizes or stakes, but would only be permitted at a Regional Casino. Readers are advised to refer to Camden's website or the Gambling Commission Website where this information will be displayed and updated as various changes occur.
90. Separate Guidance on permit application procedures, renewal, lapse, surrender, forfeiture, refusal, conditions, stakes and prizes of the various permits is available on the Camden website [www.camden.gov.uk/licensing](http://www.camden.gov.uk/licensing) or a copy can be mailed by contacting the Planning and Public Protection Service. Contact details are on the back cover of this Statement of Principles.

#### **Alcohol Licensed Premises - Gaming Machine Notifications**

91. Gaming Machines are commonly referred to as 'fruit machines' or 'one arm bandits'. Gaming Machine Notifications and Alcohol Licensed Premises Permits for three or more machines authorise the use of categories C and D Gaming Machines on Alcohol Licensed Premises (pubs and bars etc).



92. Any premises that has a Premises Licence granted under the Licensing Act 2003 that permits the retail sale of alcohol (an “alcohol licence”), and has a bar at which alcohol is served for consumption on the premises, has an automatic entitlement to provide two category C or D gaming machines. This excludes restaurants or similar premises from having gaming machines where they have a condition requiring alcohol is sold as ancillary to food.
93. To benefit from the automatic entitlement, the holder of the Licensing Act 2003 Premises Licence must give notification to the Licensing Authority together with the prescribed fee. The notification is not transferable, and should the alcohol licence be transferred, a new notification must be made to the Licensing Authority by the new alcohol licence holder.
94. The Licensing Authority has no discretion to consider the notification or turn it down. However, the Licensing Authority may make an order under section 284 of the Gambling Act to remove an automatic entitlement if:
- provision of the machines is not reasonably consistent with the pursuit of the Licensing Objectives
  - gaming has taken place on the premises that breaches a condition of section 282 for example, the gaming machines have been made available in a way that does not comply with requirements on the location and operation of gaming machines.
  - the premises are mainly used for gaming.
  - an offence under the Gambling Act has been committed on the premises.
95. In this situation, the permit holder will be given the opportunity to make oral or written representations or both to the Licensing Authority before a final determination is made.

### **Alcohol Licensed Premises – Permit for More than Two Machines**

96. If alcohol licensed premises wish to exceed the automatic entitlement to two machines, they must apply to the Licensing Authority for a permit. This permit replaces the automatic entitlement to two machines and is not an addition to it. The Licensing Authority must consider that application based upon the licensing objectives, any guidance issued by the Gambling Commission issued under Section 25 of the Gambling Act 2005, and “*such matters as they think relevant.*”
97. The Licensing Authority considers that “such matters” will be decided on a case by case basis but generally:
- the Licensing Authority may consider the size of premises and whether the numbers of machines applied for is appropriate in light of the licensing objectives and whether the premises is being “mainly used” for gambling.
  - the Licensing Authority shall have regard to the need to protect children and vulnerable persons from harmed or being exploited by gambling. The Licensing Authority will expect the applicant to

satisfy the authority that there will be sufficient measures to ensure that under 18 year olds do not have access to adult only gaming machines. The Licensing Authority will need to be satisfied that the permit holder can comply with the Gambling Commission Code of Practice on Gaming Machine Permits in Alcohol Licensed Premises.

- whether there are any issues in the premises history relating to the gambling licensing objectives that the Licensing Authority should properly consider when deciding whether to grant a permit.
98. Some alcohol licensed premises may apply for a Premises Licence for their non-alcohol licensed areas. Any such application would most likely need to be applied for, and dealt with, as an Adult Gaming Centre Premises Licence.
99. It should be noted that the Licensing Authority can decide to grant the application with a smaller number of machines and/or a different category of machines than that applied for. Conditions (other than these) cannot be attached.
100. The above list is not exhaustive, but merely indicative of issues that may be considered. All applications shall be determined on their own merits and are subject to any Guidance or Codes of Practice issued by the Gambling Commission. The holder of a permit must comply with any Code of Practice issued by the Gambling Commission.

### **Club Gaming Permit**

101. Only Members Clubs and Miners' Welfare Institutes may apply for a Club Gaming Permit. Commercial clubs may not apply.
102. The Gambling Commission guidance provides that members clubs must:
- have at least 25 members
  - be established for, and conducted wholly or mainly for, purposes other than gaming (unless gaming is permitted by separate regulations)
  - be permanent in nature
  - not established to make a profit; and
  - controlled by its members equally.
103. A Club Gaming Permit allows a total maximum of three Gaming Machines of categories B4, C or D. It also permits the playing of games of chance and equal chance, such as Pontoon. Please refer to our website for a detailed and up to date list of permissions, prizes and stakes.
104. A Club Gaming Permit lasts for ten years unless it ceases to have effect because it is surrendered, cancelled or forfeited. The Licensing Authority

may only grant or refuse a Club Gaming Permit; it cannot add conditions.

105. Camden's Guidance for Gambling Act Permits (available on our website at [www.camden.gov.uk](http://www.camden.gov.uk)) provides details on application procedures, conditions on Club Gaming permits, details of the various permissions, and grounds for refusing a permit.
106. Miners' Welfare Clubs are associations established for recreational or social purposes. They are managed by representatives of miners or use premises regulated by a charitable trust, which has received fund from one or a number of mining organisations.

### **Club Machine Permit**

107. Members Clubs, Miners' Welfare Institutes may opt to apply for the Club Machine Permit where they do not want to have the full gaming provided by a Club Gaming Permit. In addition, Commercial Clubs may also apply for a Club Machine Permit.
108. Commercial Clubs are Members Club established for profit, such as snooker clubs.
109. A Club Machine Permit allows a total maximum of three Gaming Machines of categories B4, C or D. Please refer to our website for a detailed and up to date list of permissions, prizes and stakes.
110. A Club Machine Permit lasts for ten years unless it ceases to have effect because it is surrendered, cancelled or forfeited. The Licensing Authority may only grant or refuse a Club Machine Permit; it cannot add conditions.
111. Camden's Guidance for Gambling Act Permits (available on our website at [www.camden.gov.uk](http://www.camden.gov.uk)) provides details on application procedures, conditions on Club Machine permits, details of the various permissions, and grounds for refusing a permit.

### **Prize Gaming Permits**

112. Prize Gaming is where the nature and size of the prize is not determined by the number of people playing or the amount paid for or raised by the gaming. The prize is determined by the operator before play commences.
113. When determining a Prize Gaming Permit application, the Licensing Authority will consider whether:
  - the applicant clearly understands the limits to stakes and prizes that they propose to offer and the gaming is within the law

- the premises where gaming is proposed to be offered is not situated in the vicinity of areas that may overly attract young people, such as schools, after school care and/or parks playgrounds
  - the applicant has any relevant convictions
  - the offering of prize gaming is in accordance with the licensing objectives. This may include whether offering Prize Gaming on the premises is likely to attract or perpetuate issues around crime and disorder in the area or issues around children and young people or the vulnerable
  - there have been any objections relevant to the licensing objectives made by the Police.
114. The above list is not exhaustive, but an indication of the types of issues that may be considered on application and is not exhaustive.
115. Camden's Guidance for Gambling Act Permits provides details on application procedures, renewal, lapse, surrender, forfeiture, refusal, conditions on Prize Gaming Permits, details of the various permissions, and exemptions from requiring a Prize Gaming Permit.
116. There are conditions in the Gambling Act 2005 with which the permit holder must comply, but the Licensing Authority cannot attach conditions itself. The conditions in the Act are:
- the limits on participation fees, as set out in regulations, must be complied with
  - all chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played
  - the prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if non-monetary prize); and
  - participation in the gaming must not entitle the player to take part in any other gambling.

### **Unlicensed Family Entertainment Centre Permits**

117. The Unlicensed Family Entertainment Centre Permit authorises the lowest stake gaming machines (Category D). The Camden Licensing Authority can grant or refuse an application for an Unlicensed Family Entertainment Centre permit, but cannot add conditions.
118. Unlicensed Family Entertainment Centres are likely to cater to families, including unaccompanied children and young persons and are likely to be arcade style premises such as in airports and motorway service centres. Unlicensed Family Entertainment Centres should not be confused with Licensed Family Entertainment where the operators must

obtain a Premise Licence and there must be a clear segregation between areas permitted for children and over 18s.

119. The applicant must show that the premises will be wholly or mainly used for making gaming machines available for use.
120. An application for a permit may be granted only if the Licensing Authority is satisfied that the premises will be used as an unlicensed FEC, and if the chief officer of police has been consulted on the application.

### **Travelling Fairs**

121. The Licensing Authority is responsible for deciding whether, where Category D machines and / or equal chance prize gaming without a permit is to be made available for use at travelling fairs, the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair is met.
122. The Licensing Authority will also consider whether the applicant falls within the statutory definition of a travelling fair.
123. It is noted that the 27-day statutory maximum for the land being used as a fair applies on a per calendar year basis, and that it applies to the piece of land on which the fairs are held, regardless of whether it is the same or different travelling fairs occupying the land. The Licensing Authority will work with its neighbouring authorities to ensure that land which crosses our boundaries is monitored so that the statutory limits are not exceeded.

### **Temporary Use Notices**

124. Temporary Use Notices allow the use of premises for gambling where there is no premises licence but where a gambling operator wishes to use the premises temporarily for providing facilities for gambling. Premises that might be suitable for a Temporary Use Notice, according to the Gambling Commission, would include hotels, conference centres and sporting venues.
125. The Licensing Authority can only grant a Temporary Use Notice to a person or company holding a relevant operating licence, i.e. a non-remote casino operating licence.
126. The Secretary of State has the power to determine what form of gambling can be authorised by Temporary Use Notices, and at the time of writing this Statement the relevant regulations (SI no 3157: The Gambling Act 2005 (Temporary Use Notices) Regulations 2007) state that Temporary Use Notices can only be used to permit the provision of

- facilities or equal chance gaming, where the gaming is intended to produce a single winner, which in practice means poker tournaments.
127. There are a number of statutory limits as regards Temporary Use Notices. The meaning of "premises" in Part 8 of the Act is discussed in Part 7 of the Gambling Commission Guidance to Licensing Authorities. As with "premises", the definition of "a set of premises" will be a question of fact in the particular circumstances of each notice that is given. In the Act "premises" is defined as including "any place".
  128. In considering whether a place falls within the definition of "a set of premises", the Licensing Authority needs to look at, amongst other things, the ownership/occupation and control of the premises.
  129. This Licensing Authority expects to object to notices where it appears that their effect would be to permit regular gambling in a place that could be described as one set of premises, as recommended in the Gambling Commission's Guidance to Licensing Authorities.

#### **Occasional Use Notices**

130. The Licensing Authority has very little discretion in relation to these notices aside from ensuring that the statutory limit of eight days in a calendar year is not exceeded. However the Licensing Authority will consider the definition of a 'track' and whether the applicant is permitted to avail him/herself of the notice.

## Section 4: Integration with other Policies

131. This section identifies related strategies and sets out how the Licensing Authority will integrate its licensing functions with these strategies.

### Enforcement

132. The Licensing Authority will be responsible for ensuring compliance with Premises Licences and other permissions such as notices and permits. The Gambling Commission will be the enforcement body for Operator and Personal licences, which includes concerns around supply, manufacture and repair of gaming machines, and online gaming.
133. The Licensing Authority will have regard to any guidance issued by the Gambling Commission on enforcement. Where no specific guidance exists, the Licensing Authority will follow the principles on enforcement provided by the Better Regulation Executive and Hampton Review of regulatory inspections and enforcement. Overall, these provide that a regulator will be:
- proportionate - intervene where necessary and where remedies are taken these will be appropriate to the risk posed and costs identified and minimised
  - accountable – be able to justify decisions made and expect to be open to public scrutiny
  - consistent – have rules and standards which are joined up and implemented fairly
  - transparent – keep regulation simple, open and user friendly
  - targeted - remain focused on the problem and minimise the side effects.
134. The Licensing Authority has a risk-based enforcement programme. This means we will endeavour to target high-risk premises, which require greater attention, whilst operating a 'light touch' enforcement for low risk premises who require less attention.
135. Camden's enforcement policy is in accordance with the relevant regulatory enforcement guidance.
136. In exercising enforcement functions under the Gambling Act, the Licensing Authority will endeavour to avoid duplication with other regulatory regimes as far as possible.

### Planning Policies

137. When determining an application, the Licensing Authority cannot take into account the likelihood of the applicant obtaining planning permission, listed building consent or building regulations approval. However, as a Responsible Authority, Planning will be notified of licensing applications, allowing them to cross check any licensing

applications with the authorised or lawful use of the premises under the relevant planning laws. Accordingly, applications for permanent premises (or variations to permanent premises) should normally be made where the operator already has the appropriate planning permissions and consents for the property concerned.

138. Although not part of the Statement of Principles, applicants are reminded that there are various borough-wide and area based planning guidance and strategies which may be relevant to the non-licensing components of any proposal. These include:
- The Town and Country Planning Act (1990) as amended
  - Town and Country Planning (Use Classes) Order 1987 and subsequent amendments
  - Local Development Framework (November 2011)
  - Camden Planning Guidance 2011
  - Revised Supplementary Planning Guidance for Central London: Food, Drink and Entertainment, Specialist and Retail uses

### **Crime and Disorder Policies**

139. This Statement of Licensing Principles has been written having regard to the Safer Camden Strategy 2008-11. In supporting the aims of the strategy, the Licensing Authority will work in partnership with the police and other responsible authorities to ensure that crime and disorder issues around gambling premises are tackled effectively. This includes expanding the work of the Licensing Tasking Meeting to include a fortnightly examination of crime and disorder statistics around Gambling Premises and the taskings of the appropriate agencies to deal with identified issues where appropriate.
140. Further information about the Safer Camden Strategy can be found at [www.camdensafe.org](http://www.camdensafe.org).

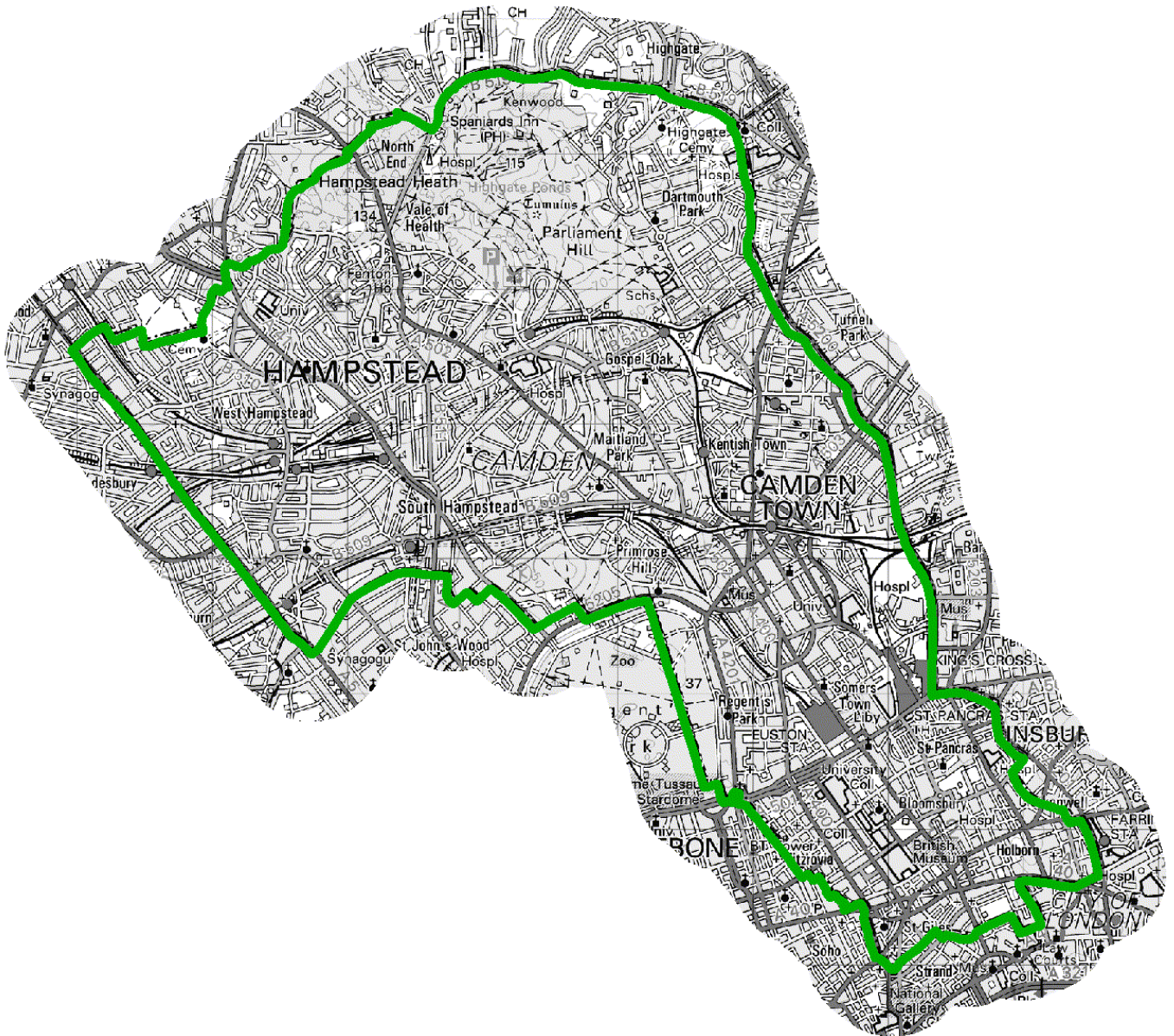
### **Policies about Children and Young Persons**

141. The Licensing Authority will look to the Camden Safeguarding Children Board to advise on issues around Protection of Children from Harm. Camden's strategy around children and young people are found in the Camden's Children and Young People's Plan 2009-12. This plan underpins the functions of the Camden Safeguarding Children Board to ensure young people and children achieve their full potential.



# Appendices

## Appendix 1: Geographical Area covered by the Statement of Principles



## **Appendix 2: Camden's Responsible Authorities**

### **Camden Licensing Authority**

Town Hall Extension  
Argyle Street  
London  
**WC1H 8EQ**

### **Police**

Licensing / Partnership Office  
Holborn Police Station  
10 Lambs Conduit Street  
London  
**WC1 3NR**

### **Fire Brigade**

Fire Safety Regulation  
South West Area 4  
London Fire Brigade  
169 Union Street  
London  
**SE1 0LL**

### **Gambling Commission**

Victoria Square House  
Victoria Square  
Birmingham  
B2 4BP

### **HM Revenue and Customs**

National Registration Unit  
Portcullis House  
21 India Street  
Glasgow  
Scotland  
**G2 4PZ**

### **Camden Safeguarding Children Board**

Unit 6/7 Crowndale Centre  
218 Eversholt Street  
London  
NW1 1BD

### **Environmental Health**

Town Hall Extension  
Argyle Street  
London  
WC1H 8EQ

### **Planning**

Town Hall Extension  
Argyle Street  
London  
WC1H 8EQ