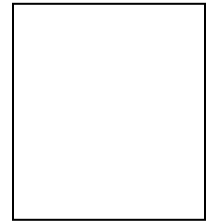




## SHEFFIELD CITY COUNCIL Licensing Sub Committee Report



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**Report of:** Chief Licensing Officer, Head of Licensing

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**Date:** Tuesday 27<sup>th</sup> February 2024 at 10am

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**Subject:** Gambling Act 2005

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**Author of Report:** Shimla Finch

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**Summary:** To consider an application to grant a premises licence for a Betting Premises made under the Gambling Act 2005 for **Bet Extra, 17-19 Market Place, Sheffield, S1 2GH**

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**Recommendations:** That members carefully consider the representations made in accordance with the legislation, codes of practice, guidance to local authorities and the Licensing Authority's Statement of Principles (policy).

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**Background Papers:** Attached documents  
[Sheffield City Councils Statement of Principles – Gambling Act 2005](#)  
[Gambling Commissions Guidance for Licensing Authorities](#)  
[Gambling Commissions Licence Conditions and Code of Practice](#)

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**Category of Report:** OPEN

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**REPORT OF THE CHIEF LICENSING OFFICER  
(HEAD OF LICENSING) TO THE LICENSING SUB COMMITTEE  
GAMBLING ACT 2005**

Ref No 21/24

**Bet Extra, 17-19 Market Place, Sheffield, S1 2GH**

**1.0 PURPOSE OF REPORT**

1.1 To consider an application for the grant of a premises licence for a betting premises made under section 159 of the Gambling Act 2005.

**2.0 BACKGROUND – THE GAMBLING REGULATORY FRAMEWORK**

2.1 The Gambling Commission is responsible for regulating gambling in accordance with the Act, and for issuing '[operating licences](#)' to gambling businesses and '[personal licences](#)' to individuals. To help fulfil its role, the Commission attach [licence conditions and issue codes of practice](#) relating to how gambling facilities should be provided, and [guidance](#) to Licensing Authorities on how to implement their responsibilities under the Act. Operators must have or be in the process of applying for an 'operating licence' before they apply for a 'premises licence' in Local Authority areas.

2.2 Licensing Authorities are a key partner in gambling regulation, with a responsibility for overseeing 'non-remote' gambling in their local areas. This involves:

- setting the local framework for gambling through their statement of principles
- considering applications and issuing licences for premises where gambling takes place, with conditions where appropriate
- reviewing or revoking premises licences
- issuing permits for some forms of gambling
- undertaking inspection and enforcement activities, including tackling illegal gambling.

2.3 Like the Gambling Commission, Licensing Authorities are bound by a statutory 'aim to permit' and must grant premises licences so long as applications are:

- in accordance with the Gambling Commission's [codes of practice](#)
- in accordance with the [guidance to local authorities](#)
- in accordance with the [licensing authority's own statement of principles](#)
- reasonably consistent with the [three licensing objectives](#).

**BETTING PREMISES (OFF COURSE BETTING)**

2.4 Off Course Betting is betting that takes place other than a track, more commonly known as a 'betting office'. The holder of a betting premises licence may make the following gaming machines available for use:

- **Up to 4 Gaming Machines of Category B, C or D**  
(Regulations state that category B machines at betting premises are restricted to sub-

category B2, B3 and B4 machines (the terminals commonly in use are able to provide both B2 and B3 content).

2.5 Details of the machine categories can be found on the following link: [The Categories of Gaming Machines Regulations 2007](#)

## 2.6 **Gambling Commissions Guidance for Licensing Authorities**

### **The protection of children and young persons in betting premises:**

- Children and young persons are not permitted to enter premises with a betting premises licence.
- Sections .46 and s.47 of the Act set out offences of inviting, causing or permitting a child or young person to gamble, or to enter certain gambling premises.
- [Social Responsibility \(SR\) code 3.2.7\(3\)](#) in the [Licence Conditions and Codes of Practice](#) (LCCP) states that 'licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises' in order to prevent underage gambling.
- Children and young persons are not allowed to be employed at premises with a betting premises licence.

2.7 Details of our local policy on Betting shops can be found at [part 7.12 of SCC's Statement of Principles \(Gambling Policy\)](#), a section of which is detailed below for ease:

#### **7.12.2 Policy – Off course (Betting Shops)**

Factors for consideration by the Licensing Authority when determining an application for a betting premises licence (other than a track) will consider how the applicant has demonstrated the:

- Promotion of the licensing objectives in Part 4 of this policy and the Authority's principles under this part
- Local area profiling of the applicant through their risk assessments
- Location of the premises in particular to young and/or vulnerable persons (see location policy Part 5)
- Procedures in place to prevent access to young people under the age of 18
- Suitability and lay out of the premises
- Size of the premise in relation to the number of betting machines
- The ability of staff to monitor the use or abuse of machines
- Self-exclusion systems
- Staff training in relation to responding to underage or vulnerable people

This is not an exhaustive list and each application will be judged on its merits. Any effective measures to support the licensing objectives will be taken into account.

2.8 Further information on Betting Premises can be found in the:

- [Gambling Commissions guidance to Local Authorities.](#)
- [Licence Conditions and Codes of Practice \(gamblingcommission.gov.uk\)](#)

## **Mandatory and default conditions of Betting Shops**

- 2.9 The majority of premises licences under the Gambling Act 2005 will have mandatory and/or default conditions attached to the licence under [The Gambling Act 2005 \(Mandatory and Default Conditions\) \(England and Wales\) Regulations 2007](#). Default conditions are prescribed in regulations and will be attached to all classes of premises licence, unless excluded by the licensing authority. Mandatory conditions are automatically attached to a specific type of premises licence; the licensing authority has no discretion to alter or remove these conditions. These are detailed below:

### **Mandatory conditions attached to all premises licences.**

- 1) *The conditions specified in paragraphs (2), (3) and (4) shall be attached to every premises licence.*
- 2) *The summary of the terms and conditions of the premises licence issued under section 164(1)(c) of the 2005 Act shall be displayed in a prominent place within the premises.*
- 3) *The layout of the premises shall be maintained in accordance with the plan.*
- 4) *The premises shall not be used for -*
  - (a) *the sale of tickets in a private lottery or customer lottery, or*
  - (b) *the sale of tickets in any other lottery in respect of which the sale of tickets on the premises is otherwise prohibited.*

### **Mandatory conditions attached to Betting premises licences (other than track)**

1. *A notice stating that no person under the age of 18 years is permitted to enter the premises shall be displayed in a prominent place at every entrance to the premises.*
2. (1) *Access to the premises shall be from a street or from other premises with a betting premises licence.*  
  
(2) *Without prejudice to sub-paragraph (1), there shall be no means of direct access between the premises and other premises used for the retail sale of merchandise or services.*
3. *Subject to anything permitted by virtue of the 2005 Act, or done in accordance with paragraphs 4, 5, 6 and 7 below, the premises shall not be used for any purpose other than for providing facilities for betting.*
4. *Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to leave any gaming machine or betting machine in order to do so.*
5. *No apparatus for making information or other material available in the form of sounds or visual images may be used on the premises, except for apparatus used for the following*

*purposes –*

- (a) *communicating information about, or coverage of, sporting events, including -*
    - (i) *information relating to betting on such an event; and*
    - (ii) *any other matter or information, including an advertisement, which is incidental to such an event;*
  - (b) *communicating information relating to betting on any event (including the result of the event) in connection with which betting transactions may be or have been effected on the premises.*
6. *No publications, other than racing periodicals or specialist betting publications, may be sold or offered for sale on the premises.*
7. *No music, dancing or other entertainment shall be provided or permitted on the premises, save for entertainment provided in accordance with paragraph 5.*
8. (1) *No alcohol shall be permitted to be consumed on the premises at any time during which facilities for gambling are being provided on the premises.*
- (2) *A notice stating the condition in sub-paragraph (1) shall be displayed in a prominent place at every entrance to the premises.*
9. *A notice setting out the terms on which customers are invited to bet on the premises shall be displayed in a prominent place on the premises to which customers have unrestricted access.*

**Default conditions attaching to betting premises licences (other than in respect of tracks)**

*No facilities for gambling shall be provided on the premises between the hours of 10pm on one day and 7am on the next day.*

**LOCAL AREA RISK ASSESSMENTS**

- 2.10 The Licensing Authority needs to be satisfied that there is sufficient evidence that the particular location of the premises would not undermine the licensing objectives.
- 2.11 The Gambling Commission's [Licence Conditions and Codes of Practice \(LCCP\)](#), sets out requirements for licensees to assess local risks posed by the provision of gambling facilities at their premises and to have policies, procedures and control measures in place to mitigate those risks. The codes of practice require licensees to share their risk assessment with Licensing Authorities.
- 2.12 Sheffield City Council's policy on applicant's local risk assessments is detailed in [Part 5 of the Gambling Policy Statement of Principles](#), this details what the Authority expects applicants to consider and detail in their risk assessments.

### **3.0 THE APPLICATION**

3.1 The applicant is Bet Extra Limited.

3.2 The application was received by the Licensing Authority on the 25<sup>th</sup> October 2023. A full copy of the following application documents is attached at Appendix 'A' of this report:

- Premises licence application
- Plan of the premises
- Local Area Risk Assessment

3.3 The applicant's premises licence application for betting facilities has chosen not to exclude the default condition in respect of times of operation. The default times of operation for betting premises are between 07:00 to 22:00 hours.

3.4 Bet Extra Limited currently has a betting premises licence for 19 Market Place, Sheffield, S1 2GH. This application is a new application for 17-19 Market Place, Sheffield, which is to extend the existing premises.

### **4.0 REASONS FOR REFERRAL**

4.1 The application has been referred to the Licensing Sub-Committee due to unresolved representations from the following Responsible Authorities and Interested Parties which are attached at Appendix B:

- Sheffield Children Safeguarding Partnership (Responsible Authority)
- The Licensing Authority (Responsible Authority)
- Green Party City Ward Councillors
- Mr C Ritchie – on behalf of 'Gambling with Lives' Charity and a local resident
- ChangingSheff – 'The residents' association for 27,000 people living within a radius of 750 metres of City Hall'

4.2 During the consultation period, South Yorkshire Police and the applicant have agreed to additional conditions if the application is granted. A full copy of these conditions can be found at Appendix 'C' of this report and refers to the requirement of CCTV, incident logs and acquiring the CCRAC Radio Scheme (City Centre Retailers Against Crime) when trading.

4.3 The objections referred to in 4.1 above detail concerns in relation to the following licensing objectives:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

In particular, the following factors:

- Area is a hotspot for violence and antisocial behaviour

- Area is part of a violent crime initiative
- Lack of resources to deal with current issues in the area
- Increased exposure to gambling related harm issues and vulnerable people in the area
- Content around city centre regeneration and plans
- Equality Impact issues to protected characteristics
- Risks around the location of the gambling premises in particular to:
  - Demographics of local area and close to areas of high deprivation
  - Close proximity to sensitive buildings and sensitive locations (examples given)
  - Density of gambling premises in area and vulnerable people
  - Location of premises in vicinity of secondary school travelling to and from at least 2 schools.
  - Proximity to congregation points of the young
  - Transport links (Supertram) used by the young and vulnerable
  - Risk of problem gamblers – typically male and in younger age groups - student population and nearby universities
  - Exposure and negative affect to children/young adults and vulnerable persons
  - Exposure to vulnerable persons - proximity of the congregation points for people suffering from mental health issues and drug and alcohol addiction – [Archer Project](#) / McDonalds and the Cathedral grounds
  - The Foundry (close to proposed gambling premises) is a community hub for a number of support services including addiction support groups (sensitive building)

4.4 The applicant and the objectors have been invited to attend the hearing. Copies of the front page of the notices are attached to this report labelled Appendix 'D'.

## 5.0 POLICIES, STRATEGIES AND PLANS TO CONSIDER

51 Members are to consider the following policies, strategies and plans:

### [Sheffield City Council's Statement of Licensing Policy](#)

- **Part 3** – Integrating Strategies
- **Part 4** – Licensing Objectives
- **Part 5** – Location, Area Profiling and Risk assessments
  - 5.2 Policy- Location
  - 5.3 Areas profiling and risk assessments
  - 5.4 Policy - Risk
  - 5.5 Policy - Area
- **Part 7** – Premises licence
  - 7.8 Adult Gaming Centre

### Gambling Commission Guidance to Local Authorities:

- **Part 21** – [Betting Premises](#)

### Gambling Commission's code of practice:

- Licence conditions and codes of practice (LCCP) – [assessing local risk](#)
- [Regeneration of Fargate and High Street \(welcometosheffield.co.uk\)](#)
- [City Centre Strategic Vision | Sheffield City Council](#)

## 6.0 FINANCIAL IMPLICATIONS

6.1 There are no specific financial implications arising from this application. However, additional costs may be incurred should the matter go to appeal. In such an eventuality it may not be possible to recover all these costs. The impact of these additional costs (if any) will be kept under review and may be subject of a further report during the year.

## 7.0 THE LEGAL POSITION

7.1 The Section 153 of the Gambling Act 2005, provides that in determining applications the licensing authority shall aim to permit the use of the premises for gambling in so far as it thinks it is–

- a) in accordance with any relevant (Gambling Commissions) [code of practice](#) under section 24,
- b) in accordance with any [relevant guidance](#) issued by the Commission under section 25,
- c) reasonably consistent with the [licensing objectives](#) (subject to paragraphs (a) and (b)), and
- d) in accordance with the [statement published by the authority](#) under section 349 (subject to paragraphs (a) to (c)).

7.2 In determining whether to grant a premises licence a licensing authority may not have regard to the expected demand for the facilities which it is proposed to provide.

7.3 If the licensing authority issues a betting premises licence, this will be subject to the mandatory conditions applicable to such premises licences, as prescribed under section 167 of the Act. The mandatory conditions are detailed in paragraph 2.9 above.

7.4 Further to the mandatory conditions, where a licensing authority issue a premises licence they may:

- (a) attach a condition to the licence
- (b) exclude a condition that would otherwise be attached to the licence by virtue of section 168 of the Act (default conditions).

## 8.0 HEARINGS REGULATIONS

8.1 [Regulations](#) governing hearings under the Gambling Act 2005 have been made by the Secretary of State.

8.2 The Licensing Authority has provided all parties with the information required in the Regulations to the 2005 Act as set out at Appendix 'D'.

8.3 Attached at Appendix 'D' is the following: -

- a) a copy of the Notice of Hearing;
- b) the rights of a party provided in Regulations;
- c) the consequences if a party does not attend or is not represented at the hearing
- d) the procedure to be followed at the hearing.



## **9.0 APPEALS**

- 9.1 The Gambling Act 2005 section 206 makes provision for appeals to be made by the applicant and those making representations against decisions of the Licensing Authority to the Magistrates' Court.

## **10.0 RECOMMENDATIONS**

- 9.1 That members carefully consider the representations made in accordance with the legislation, codes of practice, guidance to local authorities and the Licensing Authority's Statement of Principles (policy).

## **11.0 OPTIONS OPEN TO THE COMMITTEE**

- 11.1 To grant the premises licence in the terms requested.
- 11.2 To grant the premises licence with conditions.
- 11.3 To reject the application.

Chief Licensing Officer, Head of Licensing  
Block C, Staniforth Road Depot  
Sheffield, S9 3HD.

27<sup>th</sup> February 2024

# Appendix 'A'

**Application documents:  
Application / Plan / Risk Assessment**

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

**PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

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

Where the application is—

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

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

**Part 1 – Type of premises licence applied for**

Regional Casino <input type="checkbox"/>	Large Casino <input type="checkbox"/>	Small Casino <input type="checkbox"/>
Bingo <input type="checkbox"/>	Adult Gaming Centre <input type="checkbox"/>	Family Entertainment Centre <input type="checkbox"/>
Betting (Track) <input type="checkbox"/>	Betting (Other) <input checked="" type="checkbox"/>	

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

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

**Part 2 – Applicant Details**

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

**Section A**

**Individual applicant**

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

2. Surname: \_\_\_\_\_ Other name(s): \_\_\_\_\_

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

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

Postcode:

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

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

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

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

## Section B

### Application on behalf of an organisation

6. Name of applicant business or organisation: **BETEXTRA LIMITED**  
*[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence.]*

7. The applicant's registered or principal address:

**13 FREDERICK ST  
ROTHERHAM  
SOUTH YORKSHIRE**

Postcode: **S60 1QN**

8(a) The number of the applicant's operating licence (as given in the operating licence):

**000-043440-N-322426-009**

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

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

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

## Part 3 – Premises Details

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

11. Address of the premises (or, if none, give a description of the premises and their location):

**17-19 MARKET PLACE  
SHEFFIELD**

Postcode: **S1 2GH**

12. Telephone number at premises (if known):

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

THE PREMISE IS THE GROUND FLOOR UNIT OF A SIX STOREY BLOCK, WITH APARTMENTS ABOVE.

14(a) Are the premises situated in more than one licensing authority area?

~~Yes~~ No [delete as appropriate]

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

#### Part 4 – Times of operation

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? Yes/No [delete as appropriate]  
 [Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be no.]

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

	Start	Finish	Details of any seasonal variation
Mon	hh:mm	hh:mm	
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates:

### Part 5 – Miscellaneous

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

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? ~~Yes~~/No [delete as appropriate]

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

19(a). Do you hold any other premises licences that have been issued by this licensing authority? Yes/~~No~~ [delete as appropriate]

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

19 MARKET PLACE, SHEFFIELD S1 2GH.  
THE PROPOSAL IS AN EXTENSION OF THE CURRENT UNIT.

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

### Part 6 – Declarations and Checklist (Please tick)

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

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

Checklist:

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

**Part 7 – Signatures**

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

Signature:

[Redacted signature]

Print Name:

[Redacted name]

Date: 24/10/2013 (dd/mm/yyyy)

Capacity: DIRECTOR

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

Signature:

Print Name:

Date: (dd/mm/yyyy)

Capacity:

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

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

**Part 8 – Contact Details**

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

[Redacted name]

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

[Redacted telephone numbers]

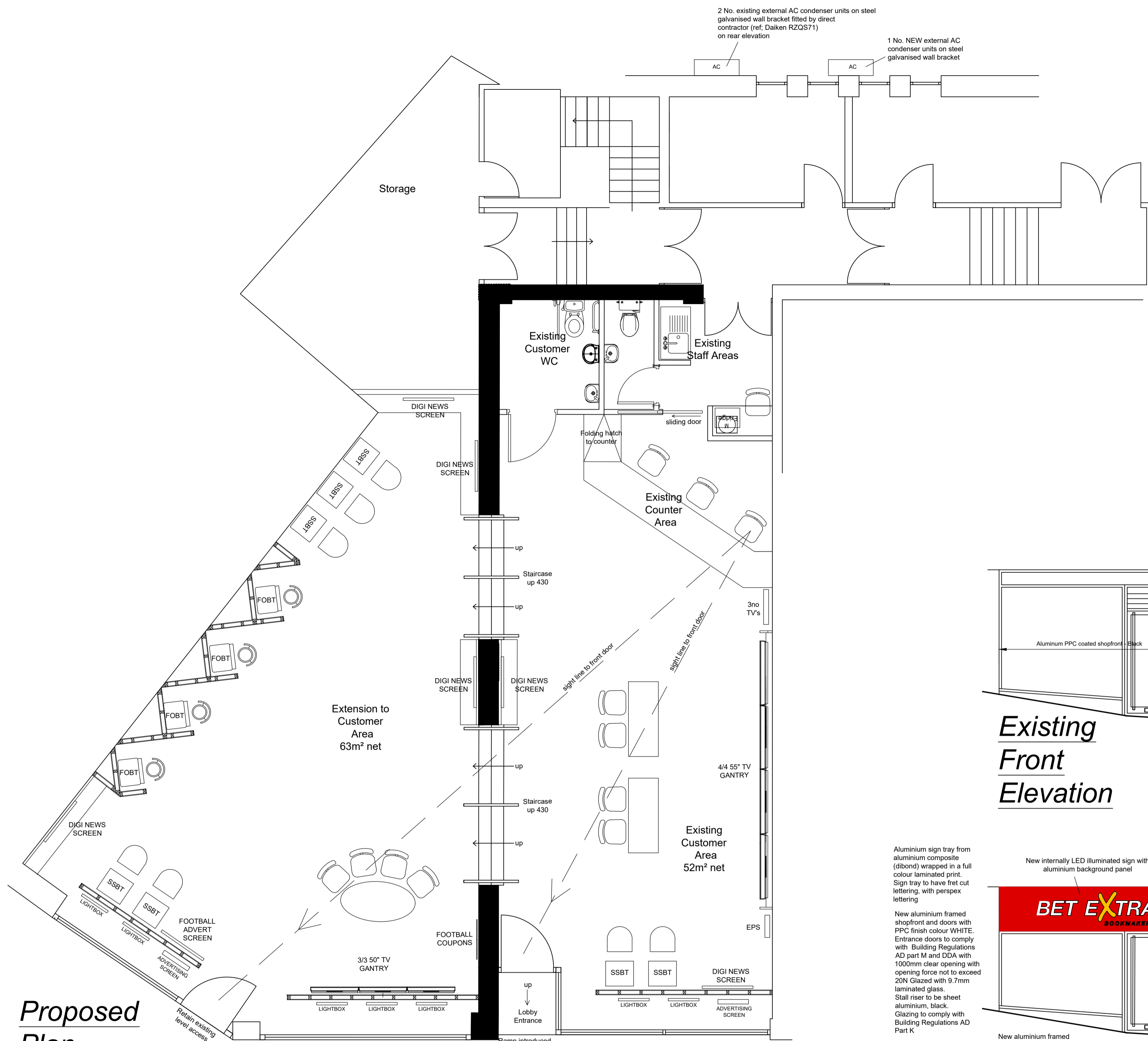
24. Postal address for correspondence associated with this application:

[Redacted postal address]

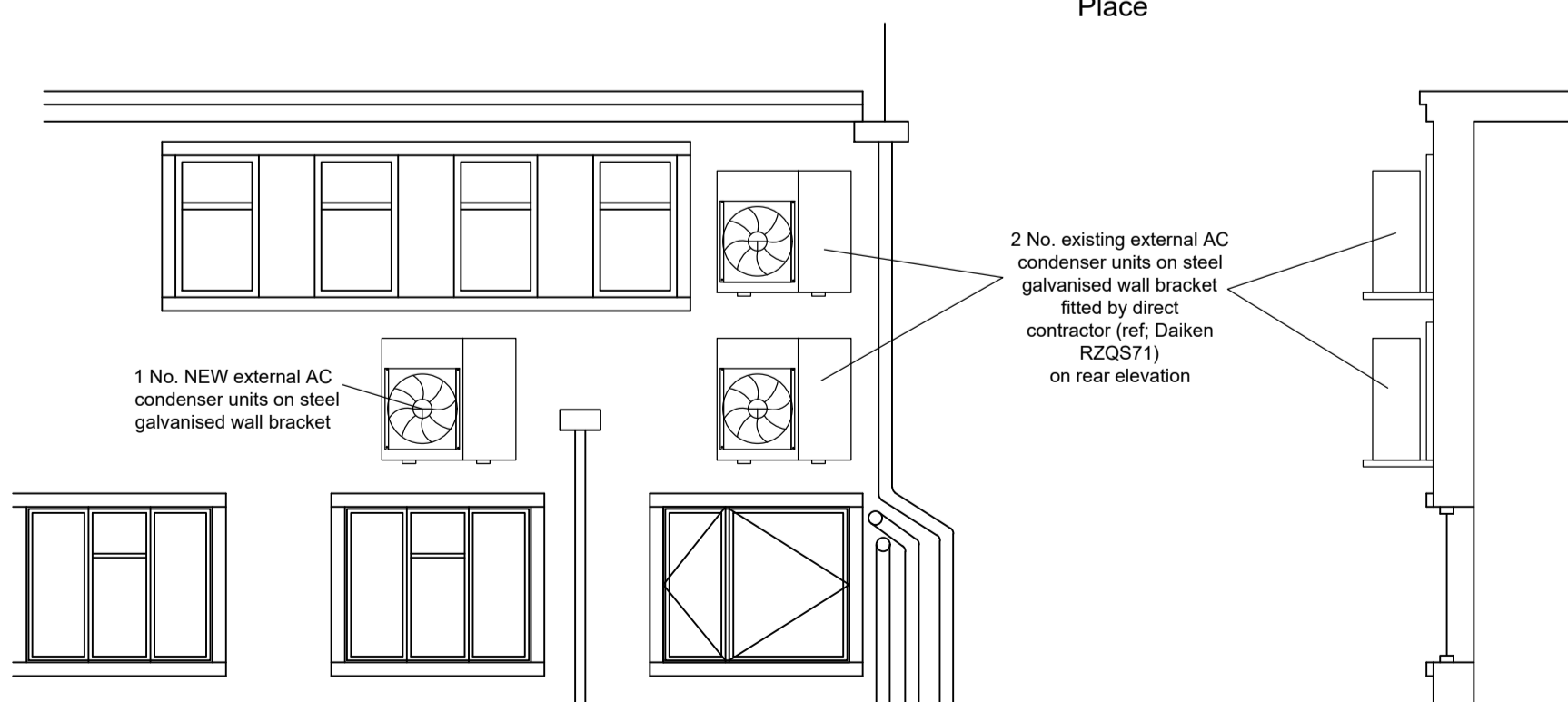
Postcode:

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

[Redacted e-mail address]

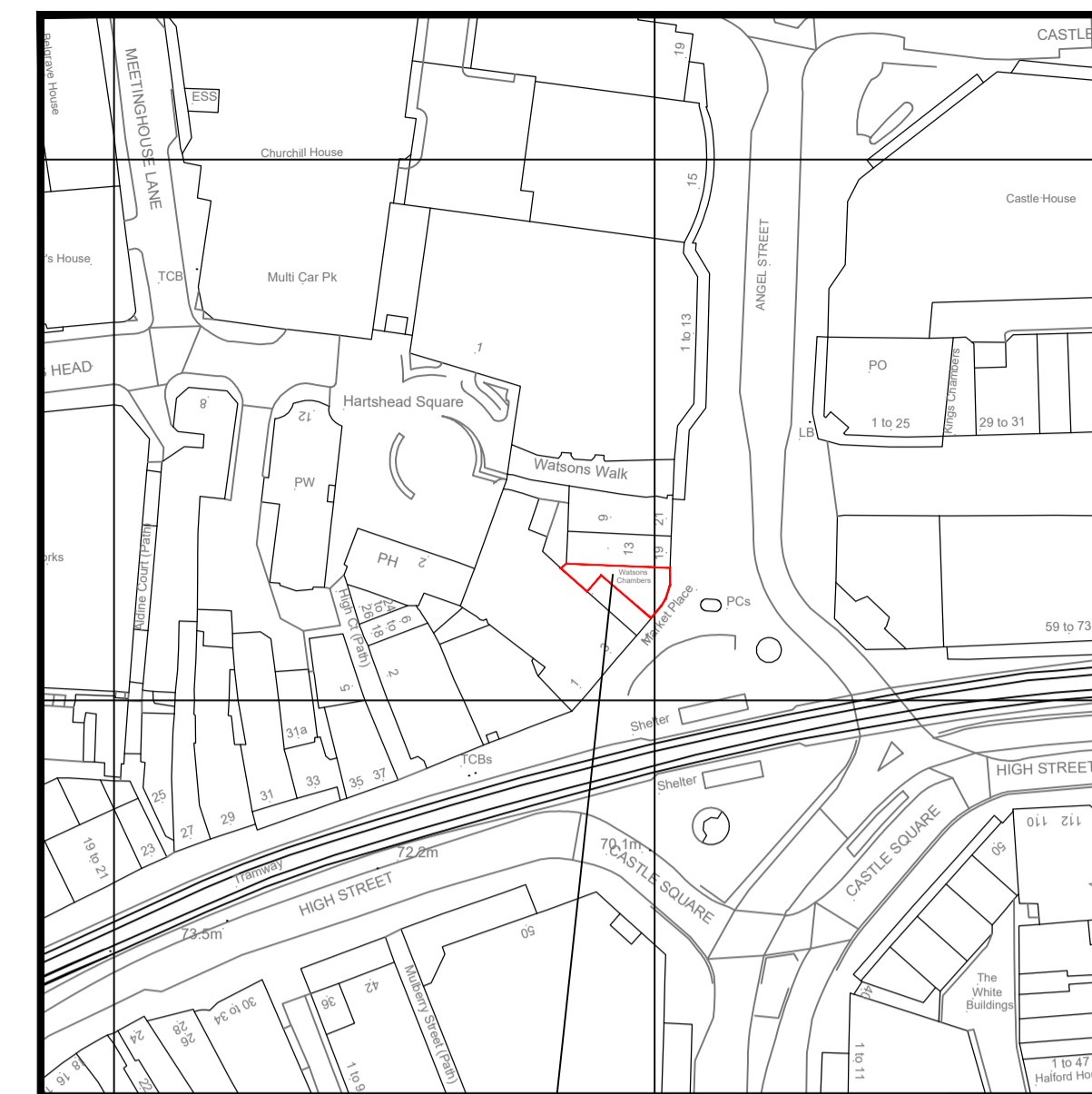


**Proposed Plan**



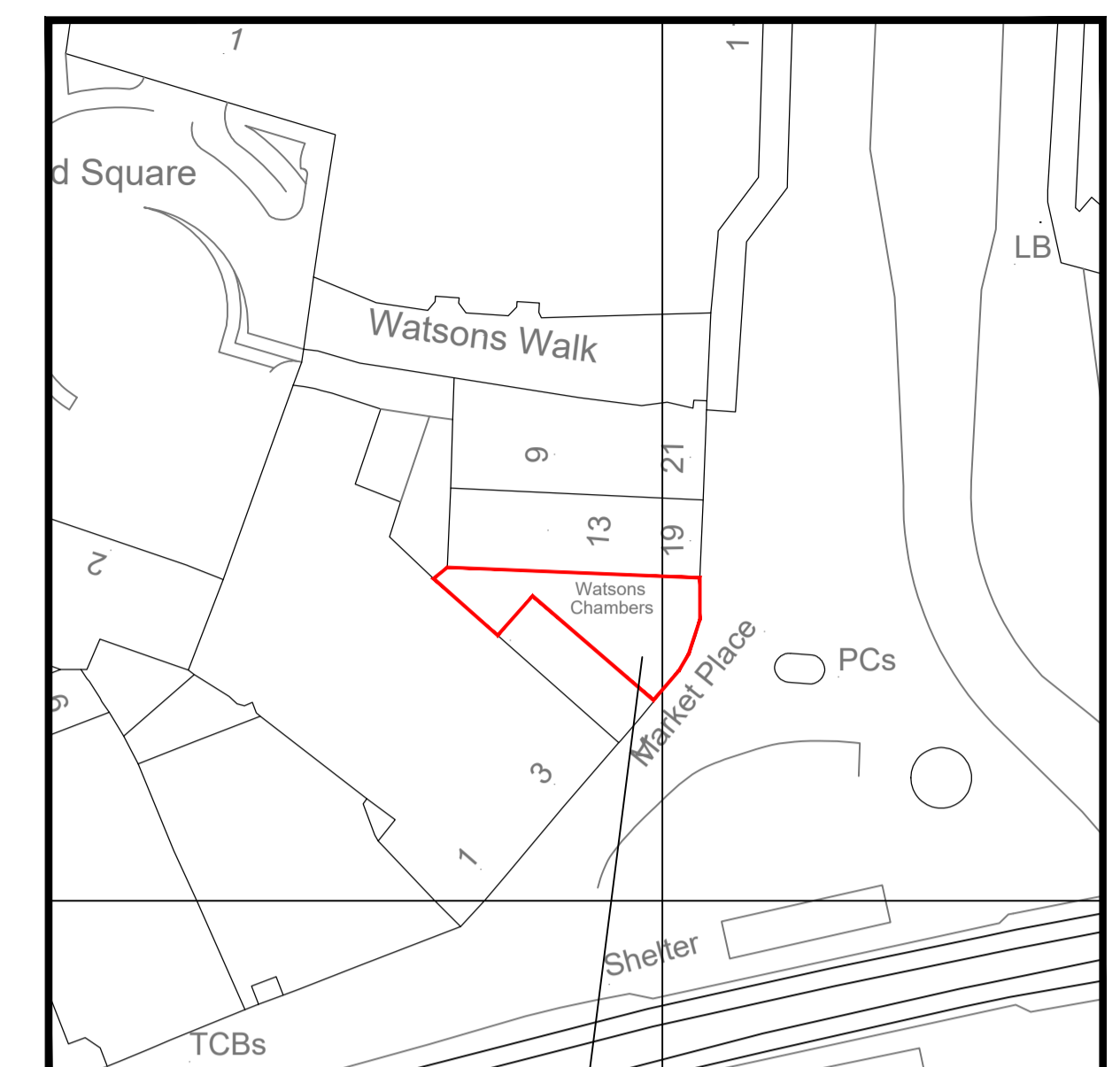
**Rear Elevation**

**Rear End Elevation /Section**



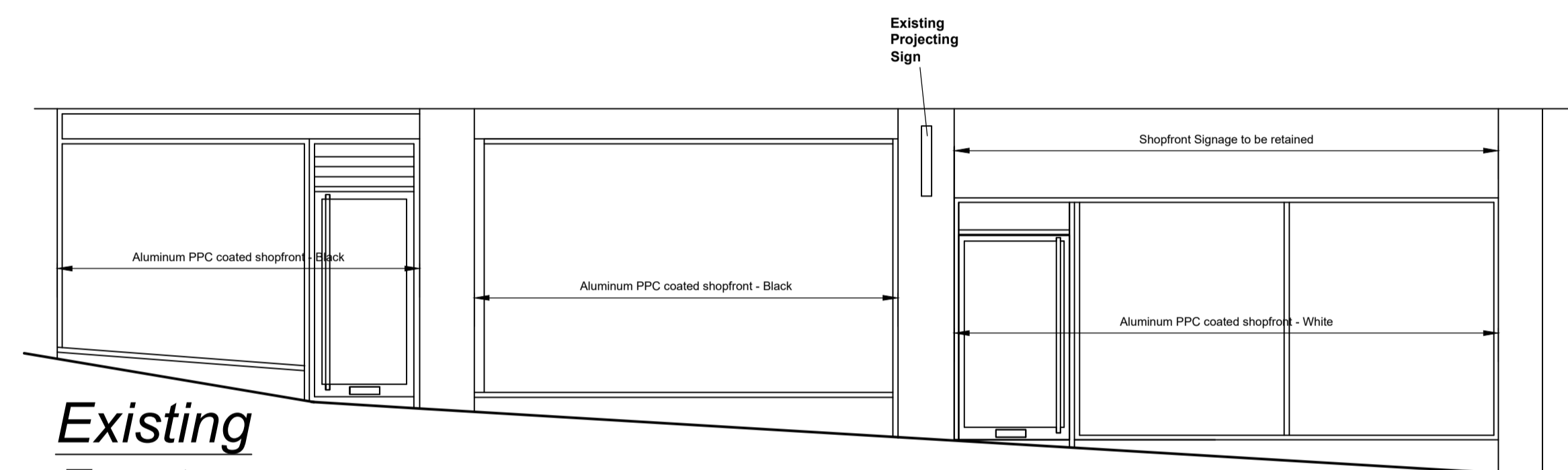
**Location Plan Scale 1:1250**

Application Site



**Site Plan Scale 1:500**

Application Site

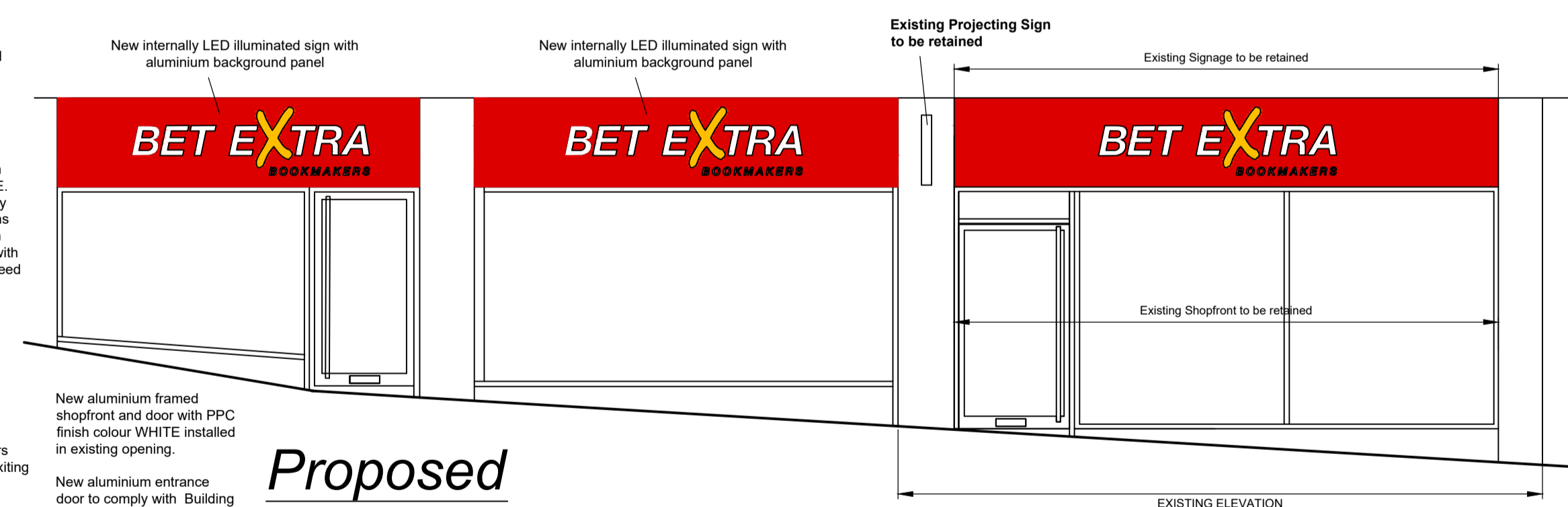


**Existing Front Elevation**

Aluminium sign tray from aluminium composite (dibond) wrapped in a full colour laminated print. Sign tray to have fret cut lettering, with perspex lettering.

New aluminium framed shopfront and doors with PPC finish colour WHITE. Entrance doors to comply with Building Regulations AD part M and DDA with 1000mm clear opening with opening force not to exceed 20N. Glazed with 9.7mm laminated glass. Stall riser to be sheet aluminium, black. Glazing to comply with Building Regulations AD Part K.

3mm grey composite sheet cladding panels to pilasters and stall risers to shopfronts to match existing 'Bet Extra' shopfront.



**Proposed Front Elevation**

New aluminium entrance door to comply with Building Regulations AD part M with 1000mm clear opening with opening force not to exceed 20N. Glazed with 9.7mm laminated glass. Stall riser to be sheet aluminium with PPC finish.

Rev	Date	Description

**Blaza**  
Building Surveying - Architecture

13 ROPERGATE END, PONTEFRAC T,  
WEST YORKSHIRE, WF8 1JU.  
TEL: (01977) 702036 FAX: (01977) 794214  
EMAIL: enquiries@blaza.co.uk

Address 17 Market Place  
Sheffield  
S1 2GH

Client Bet Extra

Title  
Proposed Extension of Existing LBO  
at 19 Market Place into  
17 Market Place

Drawn MC Date August 2023 Scale: 1:50 @ A1  
Drawing Number A/AJB/2835/23/05



# Local Authority Risk Assessment

## Premises

Premises Name:	Bet Extra
Premises Address:	17-19 Market Place
Premises Post Code:	S1 2GH
Premises Licence Number:	SY 174 GA presently at no.19- 17-19 License no. TBC
Category of Premises:	LBO

## Company

Operating Company:	Bet Extra
Operating Licence Number:	000-043440-N-322426-009

## Assessment Writer

Name of Person Writing this Assessment:	██████████
Position within Company or Name of Authorised Agent:	Director
Date that Original Assessment was Written	31 <sup>st</sup> October,2023.

## LOCAL GAMBLING RISK ASSESSMENT – BET EXTRA

### Local Area Profile

The shop is located in a busy secondary area within Sheffield town centre, close to a tram stop and bus stops. CCTV covers the area outside of the premises. Next door is an entrance to upper floors and on the other side a Gregg's bakery store. There are no schools or colleges within the vicinity.

The venue is a double-fronted unit, pentagonal in shape.

No auxiliary activities or facilities are offered other than gambling machines of category B3, C, CL and D.

There are no known local problems with crime or anti-social behaviour linked to gambling.

Our regulatory return data from trading at no.19 does not reflect any specific problems associated with consumer complaints, the need to call police for assistance or attempts by children and young persons to enter the premises.

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### Gambling Act 2005 – The Licensing Objectives

The Gambling Act 2005 sets out the three licensing objectives (LO), which are:

- A:** Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime; **B:** Ensuring that gambling is conducted in a fair and open way; and
- C:** Protecting children and other vulnerable people from being harmed or exploited by gambling.

Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
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## LOCAL GAMBLING RISK ASSESSMENT – BET EXTRA

Children entering site unnoticed or unchallenged.	(C)	Low	Severe to business Severe to child	Interior Design	*Effective monitoring of entrance by floor walkers/office staff, with well positioned cash desk having direct line of site of the entrance.	2023 October
				Exterior Design	*Frontage of venue designed so as not to be attractive to children.	2023 October
				Physical	*Electronic sensor sounding beeper across entrance door.	2023 October
				Systems	*Age restriction policies in place and implemented, Think 21 policy used. *Independent age verification tests carried out by Serve Legal. *Regular staff training both in-house.. *Adherence to Bet Extra Social Responsibility Policy. *Clear & prominent premises signage and machine labelling. *Age restriction material displayed prominently at entrance and behind the counter. *Policies & Procedures in place and regularly reviewed.	2023 October
Out of control gambling by other vulnerable persons.	(C)	Low	Moderate to business Severe to vulnerable	Systems	*Customer interaction policy & procedure/log adhered to.	2023 October
				Interior Design	*Conducive for effective monitoring of customers –six CCTV cameras.	2023 October
Failure to deal with Consumers making complaints about the outcome of Gambling.	(B)	Moderate	Moderate to business Severe to customer	Physical	*Machine maintenance carried out by qualified engineer. *Machine turned off immediately should fault be identified. *Machines only acquired from licensed suppliers.	2023 October

<b>Risk Assessment</b>	<b>LO</b>	<b>Level of Risk</b>	<b>Impact</b>	<b>Control System</b>	<b>Risk Management</b>	<b>Reviewed</b>
Failure to deal with consumers making complaints about the outcome of Gambling (continued).	(B)	Low	Moderate to business Severe to customer	Systems	*Complaints procedure & forms available on premises. * Staff trained on company policy. *Registered with ADR Entity – IBAS. *Compliant with Bet Extra Social Responsibility Policy.	2023 October

## LOCAL GAMBLING RISK ASSESSMENT – BET EXTRA

Failure to provide information to players on responsible gambling.	(C)	Low	Severe to business Severe to customer	Physical	*Stay in Control posters displayed prominently. *Sufficient quantity of posters. *Stay in Control leaflets available in racks, discretely located. *Machine labelling displaying national gambling helpline.	2023 October
				Systems	*Stock control system in place for leaflets. *Ensure adherence with Bet Extra Social Responsibility Policy. *Regular audit to ensure systems in place.	2023 October
Failure to recognise signs associated with problem gambling or substantial changes in gambling style.	(C)	Moderate	Severe to business Severe to customer	Interior design	*Player positions effectively monitored. *Player's behaviour closely monitored.	2023 October
				Systems	*Staffed trained in customer interaction. *Clear policy to record the procedure for interaction and level of staff that are authorised to intervene. Incident logs kept. *Alerts displayed on back office terminal when a certain time or spend level has been reached on a FOBT.	2023 October
Failure to properly administer the self-exclusion process and maintain its effectiveness thereafter, including breaches and reinstatements.	(C)	Low	Severe to business Severe to customer	Physical	*CCTV effectively positioned at entrance to benefit identification of known excluders.	2023 October
				Interior Design	*Consideration given to internal layout to ensure effective monitoring of customers entering the premises and those that might enter in order to gamble on behalf of a self-excluder.	2023 October
				Systems	*All data subject to annual review. *Ensure that self-exclusion forms are always available for supply. *File of excluders kept and maintained on premises. *Membership of Central Self Exclusion Scheme. Files of centrally self-excluded people kept digitally and printed copies kept. *Compliant with Bet Extra Social Responsibility Policy.	

## LOCAL GAMBLING RISK ASSESSMENT – BET EXTRA

Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Failure to identify attempts to launder money on the premises (e.g. dye stained notes) and to follow correct reporting procedure.	(A)	Low	Severe to business Low to Customers	Interior Design	*Effective monitoring of customers' behaviour by good lines of sight from static staff, and well positioned CCTV.	2023 October
				Physical	*Change giving machines and note acceptors regularly inspected.	2023 October
				Systems	*Reporting to NCA by way of SAR.	2023 October
Poor security increasing vulnerability to crime.	(A)	Low	Severe to business Severe to customers	Physical	*Static panic alarms. *Intruder alarm installed and regularly serviced with gsm signalling. *Effective CCTV coverage with data stored for 14 days. * Safe installed *Police CCTV in area outside of shop and surrounding streets.	2023 October
				Exterior Design	*Toughened glass windows and door to limit criminal damage. *Local authority/police CCTV in close proximity to premises.	2023 October
				Systems	*Regular liaison with local law enforcement agencies. *Log maintained should police be called to assist.. *Keep abreast of local crime trends.	2023 October
Awareness of heightened local crime in the local area.	(A)			Systems	In line with national urban levels. No heightened risk. <a href="https://www.police.uk">https://www.police.uk</a> <a href="https://ukcrimestats.com">https://ukcrimestats.com</a> <a href="https://www.gov.uk/government/collections/crime-statistics">https://www.gov.uk/government/collections/crime-statistics</a>	2023 October
Awareness of student learning facilities (schools & colleges) in the local area.	(C)			Systems	*No schools in immediate vicinity but aware of locations in area. Entrance monitoring given extra resources between 3pm and 4pm on school/college days.	2023 October

## LOCAL GAMBLING RISK ASSESSMENT – BET EXTRA

	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Awareness of residential facilities for the vulnerable in the local area.	(C)			Systems	*No care homes or other residential facilities for the vulnerable in the vicinity. <a href="http://www.carehome.co.uk">http://www.carehome.co.uk</a>	2023 October
Awareness of gambling care agencies in the local area.	(C)			Systems	*No facilities for problem gambling in the vicinity. <a href="http://www.gamcare.org.uk">www.gamcare.org.uk</a> <a href="http://www.gordonmoody.org.uk">www.gordonmoody.org.uk</a>	2023 October

# Appendix 'B'

## Representations / objections

Sheffield Children Safeguarding Partnership (Responsible Authority)  
The Licensing Authority (Responsible Authority)  
Green Party City Ward Councillors  
Mr C Ritchie – on behalf of 'Gambling with Lives' Charity and a local resident  
ChangingSheff





21<sup>ST</sup> November 2023 .

My name is [REDACTED] I am Licensing Manager at the Sheffield Children's Safeguarding Partnership.

I wish to object to the gambling application relating to: Bet Extra, 17-19 Market Place, Sheffield, S1 2GH. My objection is founded on the harms identified as part of the Licensing Objectives of the Gambling Act 2005 in particular concerns related to safeguarding, particularly the potential negative impact on vulnerable individuals, the community, health and wellbeing. This representation is accompanied with supporting evidence from Public Health, Sheffield City Council. This evidence can be found in Appendix 1, Annex 2 and Annex 3.

The original licence was granted approximating 10 years ago when there was limited understanding of gambling disorders and harms; in addition the industry is much more prevalent given the access to gambling 24 hours a day on line.

While I understand the importance of economic development and business growth for Sheffield city centre and it being an area of re-generation, it is equally crucial to prioritise the welfare of our residents, particularly those who may at risk of gambling harm.

Firstly, the location is currently subject to an active police orientation plan formerly known as a POP plan due to the high levels of antisocial behaviour and criminality associated with the area. Over recent months the Castle Square/Haymarket area has (and continues to) attracted large numbers of young people who are displaying antisocial behaviour which is escalating in its frequency and seriousness. While ever the behaviour is not directly linked to the premises it is occurring in this hotspot area and yet another (extended) land-based venue could encourage young people to congregate.

**Impact on Vulnerable individuals:** Gambling addiction and related problems can have a devastating impact on individuals and their families. The presence of a new gambling premises in close proximity to increasingly residential areas may expose vulnerable individuals, including those with addiction issues, minors, and those with limited self-control, to increased temptation and harm. The area is heavily frequented by vulnerable adults who are affected by/have substance misuse issues. The proposition of yet another gambling establishment encourages this cohort to gamble which could further impact on their financial situation. In addition to a number of student accommodation facilities and residential flats.

**Social Consequences:** Gambling-related problems can lead to financial instability, mental health issues, and a range of social consequences. The potential increase in problem gambling resulting from the extension to the premises may strain local support services, such as counselling and addiction treatment facilities. The link between gambling harms and negative effects on suicide and affected others is well evidenced and documented. Granting a new licence for a new land-based premises in the face of increased understanding on the impact of gambling related harms will serve to exacerbate these issues.

**Public Health:** Public Health in collaboration Sheffield Childrens Safeguarding Partnership and other interested parties including mental health practitioners and experts by lived experience and affected others have created a draft gambling harm strategy for the city (currently in public consultation) which aims to reduce the opportunities for gambling harm to occur with the evidence of affected others being well-documented including, poverty, mental health issues, domestic violence and debt. A newly licenced, extended gambling venue goes against the strategy and undermines the objectives.

Sheffield city centre already has land-based gambling venues including approximately 7 betting shops in the S 1 postcode. In addition to a large casino and the public houses of which they are around 100, the majority of which have at least one category C gambling machine which members of the public can access if they so wish. Sheffield is going through a period of regeneration and development and it would be beneficial if the city provided a mixed economy of different retail opportunities as opposed to replicating what is already available.

The location, as well as being near other gambling premises is within a short walk of the Sheffield clinic base of the recently opened NHS Northern Gambling Service on Pinfold Street which provides specialist treatment for people in the city who are already experiencing significant gambling-related harms.

The location of the betting shop is in the vicinity of secondary school children travelling to and from at least two schools each day; there is therefore a heightened risk of exposing young people to gambling activity, which can have a detrimental impact on their wellbeing and future prospects.

Thank you for your consideration.

[REDACTED]

[REDACTED]

**Safeguarding Manager**

**Sheffield Children Safeguarding Partnership &**

**Adult Safeguarding Partnership**

Floor 3 South

Howden House

Union Street

Sheffield

S1 2SH

[REDACTED]

## Appendix

### 1. Supporting Evidence



Bet Extra -  
supporting evidence \

### 2. Annex 1



Annex 1 - PH Bet  
Extra.pdf

### 3. Annex 2



Annex 2 - PH Bet  
Extra.pdf

# APPENDIX 1: PUBLIC HEALTH SUPPORTING EVIDENCE – Bet Extra

<b>PROPOSAL:</b> Gambling premises license for Bet Extra	
<b>LOCATION:</b> 17-19 Market Place, Sheffield City Centre, S1 2GH	
<b>COMMENTING OFFICERS:</b> ██████████, Director of Public Health and ██████████, Assistant Director of Public Health	<b>DATE:</b> 21st November 2023

## COMMENTS

Dear Licensing Authority

Thank you for the opportunity to comment on this licensing application. On behalf of Sheffield City Council Public Health Team, we have reviewed the application to grant a gambling premises licence for Bet Extra, 17-19 Market Place, Sheffield City Centre, S1 2GH and wish to provide supporting evidence for the representation made by ██████████, Independent Reviewing Officer/Safeguarding Licencing Manager, Sheffield City Council.

Public Health’s overarching aim is to work to protect and improve the public’s health and reduce health inequalities. As referenced in the council’s Statement of Gambling Policy 2022, a gambling harm reduction strategy for Sheffield is being produced. The co-produced strategy is currently in draft form awaiting public consultation. It sets out a comprehensive approach to minimising harm from gambling in the city, recognising the importance of preventing harm occurring in the first place.

It is our understanding that the application for a new gambling premises licence for Bet Extra, 17-19 Market Place, Sheffield City Centre, S1 2GH has been made to more than double the customer footprint of the existing Bet Extra premises at 19 Market Place, Sheffield City Centre, S1 2GH by extending into the adjoining commercial premises of 17 Market Place, S1 2GH.

It is the position of the Sheffield City Council Public Health Team that granting this gambling premises licence would be harmful to the licensing objective of: ‘protecting children and other vulnerable persons from being harmed or exploited by gambling.’ The supporting evidence for this objection can be found below.

### 1. SUMMARY OBJECTIONS

In summary our supporting evidence to this objection is as follows:

<b>1.1</b>	<p>The gambling premises licence for the existing Bet Extra shop at 19 Market Place, Sheffield City Centre, S1 2GH was granted by the council over a decade in April 2013. Since then, the evidence-base on gambling related harms has increased and strengthened; this includes evidence on:</p> <ul style="list-style-type: none"> <li>• the prevalence of gambling-related harms</li> <li>• the types of gambling-related harms and their impacts</li> <li>• the design and addictive properties of gambling products and services and those most associated with gambling-related harms.</li> </ul> <p>Importantly it also includes evidence on those persons most vulnerable to being harmed or exploited by gambling.</p>
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1.2	<p>Page 18 of the council's Statement of Gambling Policy 2022 lists a number of factors that the Licensing Authority will consider when deciding if an application is appropriate in a given location. These include:</p> <ul style="list-style-type: none"> <li>the possible impact a gambling premises may have on any premises that provide services to children, young people and vulnerable persons in the area;</li> <li>the size of the premises and the nature of the activities taking place.</li> </ul> <p>If Bet Extra Limited is granted a gambling premises license for 17-19 Market Place, S1 2GH it will more than double the size of the customer area of the existing Bet Extra premises at 19 Market Place, S1 2GH from 52m<sup>2</sup> to 115m<sup>2</sup>. This will increase accessibility and availability to gambling, including the provision of gambling products and services (activities) that are most associated with gambling harms including Fixed Odds Betting Terminals, resulting in an increased risk of harm to people who live, work, study, socialise and use services in the city centre in particular vulnerable persons.</p>
1.3	<p>There is already a high concentration of similar premises in the immediate and wider vicinity. It is of particular concern to Sheffield Public Health Team that granting this gambling premises licence will increase accessibility and availability to gambling, including the provision of gambling products and services (activities) that are most associated with gambling harms, in a location in the city that is close to multiple *sensitive locations (*as termed in the council's Statement of Gambling Policy 2022) and areas of risk.</p> <p>In terms of possible impact, these sensitive locations provide services and support to children, young people and other vulnerable persons, many of whom the evidence shows are most vulnerable to being harmed or exploited by gambling.</p> <p>These sensitive locations include:</p> <ul style="list-style-type: none"> <li>youth and children's services;</li> <li>college and university sites;</li> <li>parks and areas of greenspace;</li> <li>several student accommodation buildings;</li> <li>services for people with disabilities;</li> <li>mental health services;</li> <li>substance misuse treatment services (including for alcohol problems);</li> <li>services for vulnerable adults.</li> </ul> <p>These sensitive locations also now include the new Sheffield clinic base of the NHS Northern Gambling Service. It is the first NHS run gambling harms service in the city and provides specialist treatment and recovery for people already experiencing gambling-related harms and help to those close to them such as family, partners and carers. To note, before 2019 the only specialist NHS service of this type in England was located in London.</p> <p>Maps and a list of sensitive locations, and areas of risk, close to 17-19 Market Street, S1 2GH can be found in Annex 1 and Annex 2 submitted as part of this objection.</p>
1.4	<p>Bet Extra Limited's risk assessment for this licencing application has not recognised or detailed the full range of sensitive locations providing services and support to vulnerable persons close to 17-19 Market Street, S1 2GH. Omissions include youth and children's services, college and university sites, mental health services, support</p>

	for homeless people and the new Sheffield city centre clinic site of the Northern Gambling Service.
<b>1.5</b>	<p>Page 51 of the council's Statement of Licensing Policy 2022, states that the Licensing Authority will at all times have due regard to Equality Act 2010 and Sheffield City Council's Equality, Diversity and Inclusion Statement 2018 (latter updated 2022).</p> <p>In the context of Equality Impact Assessment (EIA), if Bet Extra Limited is granted a gambling premises license for 17-19 Market Place, S1 2GH in terms of protected characteristics it will increase the risk of gambling-related harms to men, those aged 16-44 years old and people with an indication of psychological health problems some of whom may report experiencing this as a disability.</p> <p>If taking into account the council's wider, agreed EIA considerations, granting this licence will have a negative effect on poverty and financial inclusion; this is of particular concern as around one in four people in Sheffield are living in poverty and poverty is getting worse in the city<sup>1</sup> with everyone affected by the current cost of living crisis.</p>

## 2. SUPPORTING EVIDENCE

### Gambling harms and those most at risk of being harmed or exploited

**2.1** Gambling can be a significant cause of harm to human health and wellbeing. An evidence review<sup>2</sup> by Public Health England (PHE) published in 2019 found that 1 in 12 people are either directly or indirectly affected by gambling-related harms. These include: mental health harms including that people with gambling problems are at least twice as likely to die from suicide compared to the general population; physical health harms; financial harms including debt; employment and education harms; housing problems including homelessness and relationship harms. These harms also include the economic burden of gambling to society.

**2.2** Gambling harms are not equally distributed throughout society and some people are more vulnerable to being harmed or exploited by gambling than others. Page 15 of the council's Statement of Gambling Policy 2022, notes that the Gambling Commission does not offer a definition for 'vulnerable persons' but for regulatory purposes assumes that this group of people includes those who gamble more than they want to; those who gamble beyond their means; and those who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs.

**2.3** To supplement the above with the evidence, the review<sup>2</sup> published by PHE in 2019 found that those most at risk of gambling-related harms and problem gambling are:

- Men
- Those aged 16-44 years old
- People living in an area of higher deprivation
- People who are unemployed<sup>i</sup>
- People drinking alcohol at higher risk levels
- People with poor health and wellbeing, in particular where there is an indication of psychological health problems.

<sup>1</sup> Sheffield City Council, Tackling Poverty Strategy, <[Tackling poverty | Sheffield City Council](#)>

<sup>2</sup> Public Health England, 2019, *Gambling-related harms evidence review*, accessed 13 November 2023, <[Gambling-related harms evidence review: quantitative analysis of gambling involvement and gambling-related harms among the general population in England \(publishing.service.gov.uk\)](#)>

2.4 PHE also looked at the economic burden of gambling and a summary of these findings, which includes an estimate of the economic burden of gambling for Sheffield, can be found under 'Further Information' on page 9 of this objection.

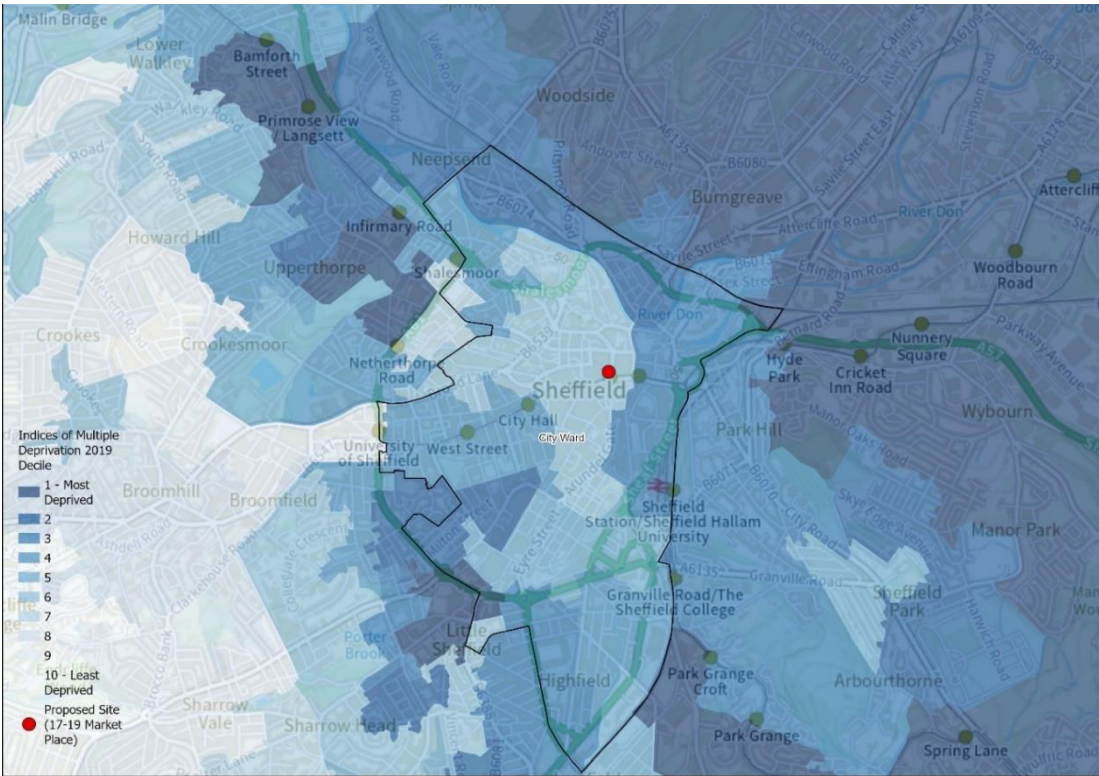
**Location of proposed Bet Extra premises and deprivation**

2.5 The location of the proposed Bet Extra premises at 17-19 Market Place, S1 2GH is within City Ward, an area of average deprivation (based on the Indices of Multiple Deprivation 2019). However, City Ward contains smaller areas of above average deprivation and is fringed by areas of Sheffield with higher than average levels of deprivation where health outcomes, along with levels of income deprivation, are worse than the England average (see Figure 1).<sup>3</sup>

2.6 Evidence shows that 5.3% of people in the most deprived neighbourhoods are gambling at levels of elevated risk compared to 3.0% in the least deprived and rates of harmful gambling are over seven times higher in the most deprived neighbourhoods compared to the least deprived neighbourhoods.<sup>4</sup>

2.7 These disparities are particularly clear when looking at land-based gambling venues, with 21% of venues located in the most deprived decile compared to 2% in the least deprived decile.<sup>5</sup> A PHE evidence review in 2021 suggests that accessibility of gambling opportunities is associated with increased gambling and gambling-related harm.<sup>5</sup>

**Figure 1: Indices of Multiple Deprivation scores for City Ward and surrounding areas**



2.8 In light of the levels of deprivation and associated poor health in and around City Ward we consider there is a clear local health and wellbeing need for measures that prevent already

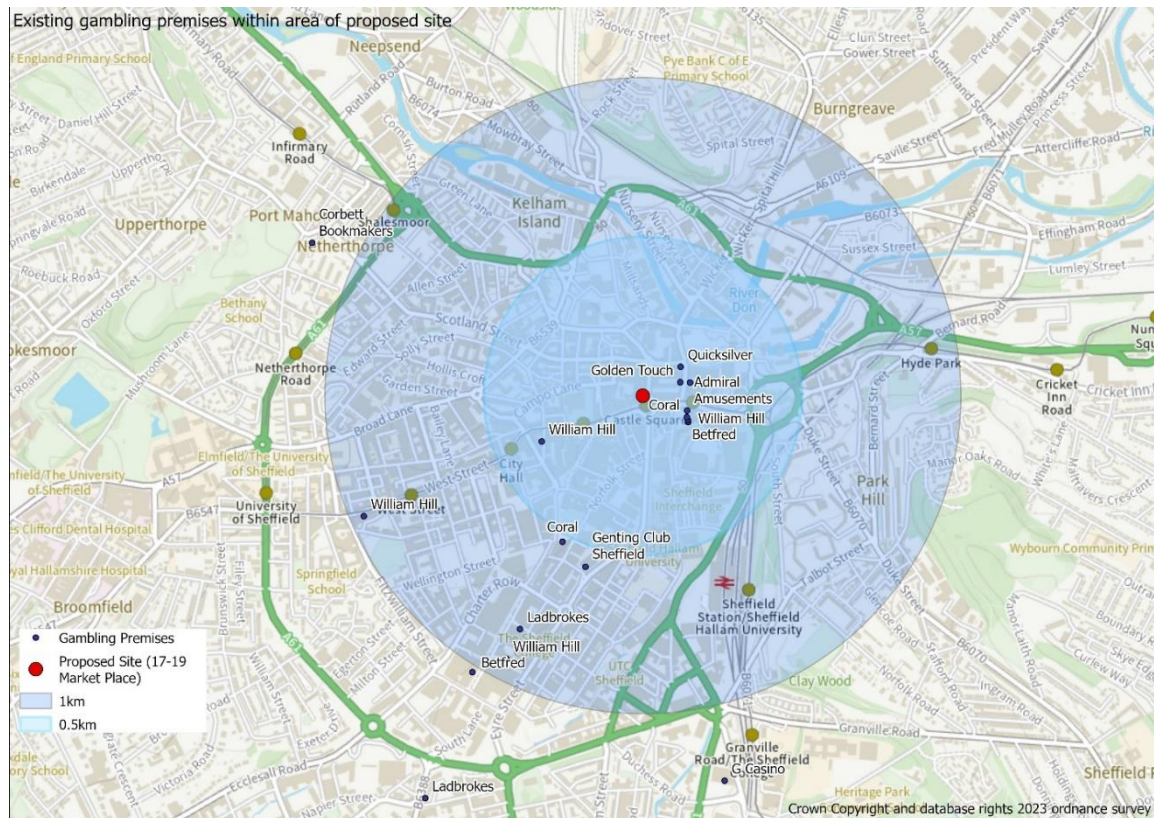
<sup>3</sup> Office for Health Improvement and Disparities (OHID), 2019, [Local Health - Office for Health Improvement and Disparities - Indicators: maps, data and charts](#); Index of multiple deprivation, 2019.  
<sup>4</sup> Gambling Research Glasgow [2021] Gambling and the Red Wall: traditional pastime or modern menace? Available online at: <https://www.grg.scot/resources/2021/10/Gambling-and-the-Red-Wall-briefing-paper.pdf>  
<sup>5</sup> Evans J. and Cross K. [2021] The geography of gambling premises in Britain. Available online at: <https://bristol.ac.uk/geography/research/pfrc/themes/vulnerability/gambling/the-geography-of-gambling-premises-in-britain/>

deprived areas from schemes and systems that reinforce disadvantage and negative impact on human health.

### Location of proposed Bet Extra premises, density of gambling premises and risk

**2.9** Sheffield City Centre already has many gambling premises such as betting offices, amusement centres and bingo halls. Figure 2 below shows that there are 8 physical locations to gamble within a 500m walking distance (a 5 minute walk) of the proposed Bet Extra premises at 17-19 Market Street and a total of 13 locations within 1km (a 12 minute walk). This does not include gambling opportunities within the surrounding pubs, hotels, and social clubs and similar premises, as well as newsagent-type off licenses who retail opportunities to buy and gamble on lottery tickets and scratch-cards.

**Figure 2: Density of Gambling Premises**



**2.10** If Bet Extra Limited were granted a gambling premises license for 17-19 Market Place, S1 2GH it will more than double the size of the customer area of the existing Bet Extra premises at 19 Market Place, S1 2GH from 52m<sup>2</sup> to 115m<sup>2</sup>. This will increase the accessibility and availability of gambling, including the provision of gambling products and services (activities) that are most associated with gambling harms including Fixed Odds Betting Terminals, resulting in an increased risk of harm to people who live, work, study, socialise and use services in the city centre in particular vulnerable persons.

### Location of proposed Bet Extra premises, proximity to sensitive locations and risk

**2.11** The council's Statement of Gambling Policy 2022 sets out its policy in relation to location on page 17 and in this lists a number of sensitive locations for consideration.

**2.12** The location of the proposed Bet Extra premises at 17-19 Market Street, S1 2GH is in close proximity to multiple sensitive locations and areas of risk. These premises provide services and support to children, young people and vulnerable persons, many of whom the



evidence shows are most at risk of being harmed or exploited by gambling. Maps and a list of sensitive locations, and areas of risk, close to 17-19 Market Street, S1 2GH can be found in Annex 1 and Annex 2 submitted as part of this objection.

**2.13** One of these sensitive locations, The Archer Project located at the Cathedral, provides a day centre for people that are homeless/rough sleeping so the footfall of vulnerable people is increased in the area. There is a known gambling issue with some people who are part of the street culture in the city centre, with staff from soup kitchens trying to access support for them from the Project's gambling harms service.

**2.14** These sensitive locations also now include the new Sheffield base of the NHS Northern Gambling Clinic; before 2019 the only specialist NHS clinic in England for people experiencing gambling-related harms was located in London.

**2.15** Recognising an increased need for specialist treatment, the NHS Long Term Plan 2019 announced plans for up to 14 new gambling harms clinics across England. Several of these new NHS clinics have now opened across the country and referrals to NHS gambling clinics have nearly doubled since 2020/21.<sup>6</sup>

**2.16** The Northern Gambling Clinic is provided by Leeds and York Partnership NHS Foundation Trust and opened in September 2019 with service provision based in Leeds. The Sheffield clinic base of the Northern Gambling Clinic for people in the city opened this year. It is the first NHS run gambling harms service in the city and provides specialist treatment and recovery for people already experiencing gambling-related harms and help to those close to them such as family, partners and carers.

**2.17** Evidence shows that increasing accessibility and availability of gambling increases the number of regular and problem gamblers in an area.<sup>7</sup>

### **Impact on children and young people**

**2.18** While the gambling industry and its regulations take measures to prevent children and young people from accessing licensed premises, granting this licence is likely to still impact on young people, not just those under the age of 18. The proposed, extended premises is within walking distance of several Sheffield Hallam University buildings, several student accommodation sites and as the city centre itself as a shopping location, is in an area well frequented by children and young people.

**2.19** Although children are not legally permitted to gamble, advertising and visibility of gambling companies and products in places where children and young people are present can normalise gambling and make it appear appealing. A recent study conducted on behalf of GambleAware looked into the exposure to and impact of advertising of gambling products on children and young people.<sup>8</sup> The study found that, despite regulations prohibiting targeting of gambling advertising to under 18s:

"Participants reported what they perceived to be high levels of exposure to gambling advertising and marketing and spoke of the ubiquitous nature of gambling advertising across multiple formats. The most common channels of exposure were identified as TV, social media

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<sup>6</sup> NHS England, 2023, NHS doubles gambling clinics as referrals soar, 2 July, accessed 13 November 2023, < [NHS England » NHS doubles gambling clinics as referrals soar](#)>

<sup>7</sup> RSPH. Health on the high street [Internet]. 2015 [cited 2019 Nov 18]. Available from: <https://www.rsph.org.uk/our-work/campaigns/health-on-the-high-street.html>

<sup>8</sup> Ipsos MORI on behalf of GambleAware [2019] Interim Synthesis Report: The effect of gambling marketing and advertising on children, young people and vulnerable adults. [https://www.ipsos.com/sites/default/files/ct/news/documents/2019-07/17-067097-01\\_gambleaware\\_interim\\_synthesis\\_report\\_090719\\_final.pdf](https://www.ipsos.com/sites/default/files/ct/news/documents/2019-07/17-067097-01_gambleaware_interim_synthesis_report_090719_final.pdf)

and the high street – including inside and outside shops, billboards and presence of gambling venues... Seeing betting shops or casino arcades was spontaneously mentioned across the research, with participants arguing that they were more prevalent in less affluent areas. The presence of the shop brand and logo was seen to build brand recognition, and participants noted the window advertising used to prominently display promotions and odds of upcoming events.”

**2.20** The reviewers found that “exposure to the sheer volume of gambling advertising and marketing led to some normalisation of gambling and, on occasion, legitimisation among participants.”

### **Public view**

**2.21** To add the public view, evidence from Bristol University showed that nearly three-quarters of consumers say that they would not want gambling premises on their ‘ideal’ high street, and there are concerns from those with lived experience of gambling harms that such venues “prey on those that can’t afford it and have taken over streets in rundown areas and towns”.<sup>9</sup>

## **3. Applicant’s risk assessment**

**3.1** Bet Extra Limited’s risk assessment for this licencing application includes reference to risks and mitigations relating to a number of sensitive locations. However, the applicant has not recognised or detailed the full range of sensitive locations providing services and support to vulnerable persons in the area as referred to in the council’s Statement of Gambling Policy 2022 and as given in this objection.

**3.2** Omissions include youth and children’s services, college and university sites, mental health services and the and the new Sheffield clinic site of the Northern Gambling Clinic for people in the city who are already experiencing significant gambling-related harms.

## **4. Gambling products and services most associated with gambling harms**

**4.1** Evidence shows that harmful gambling is associated with high participation in certain types of gambling. These include use of electronic gambling machines or Fixed Odds Betting Terminals in bookmakers (betting shops) and sports and others betting.<sup>2</sup> These types of gambling activities will be available at the extended Bet Extra premises with the planning application showing provision of four Fixed Odds Betting Terminals.

## **5. Equality Act 2010, Equality Impact Assessment and risk**

**5.1** Page 51 of the council’s Statement of Licensing Policy 2022, states that the Licensing Authority will at all times have due regard to Equality Act 2010 and Sheffield City Council’s Equality, Diversity and Inclusion Statement 2018 (latter updated 2022). The Statement of Licensing Policy 2022 states that in addition to the eight protected characteristics in the Equality Act 2010: age; disability; gender reassignment; pregnancy and maternity; race; religion/ belief and sex and sexual orientation, when undertaking Equality Impact Assessment (EIA) the council’s goes beyond its statutory duty and also assesses the impact of proposed policies or projects on the Voluntary, Community and Faith Sector, poverty and financial inclusion, carers, armed forces and cohesion.

**5.2** In the context of an EIA, with regard to protected characteristics granting this licence will increase the risk of gambling-related harms to men, those aged 16-44 years old and people with an indication of psychological health problems some of whom may report experiencing this

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<sup>9</sup> Evans J. and Cross K. [2021] The geography of gambling premises in Britain. Available online at: <https://bristol.ac.uk/geography/research/pfrc/themes/vulnerability/gambling/the-geography-of-gambling-premises-in-britain/>

as a disability. If taking into account the council's wider EIA considerations, granting this licence will have a negative effect on poverty and financial inclusion in the city; this is of particular concern as around one in four people in Sheffield are living in poverty and poverty is getting worse in the city<sup>1</sup> with everyone affected by the current cost of living crisis. As already noted, those most at risk of gambling-related harms and problem gambling include people living in an area of higher deprivation and gambling-related harms include financial harms such as debt<sup>2</sup>.

## **FURTHER INFORMATION – ECONOMIC BURDEN OF GAMBLING ON SOCIETY**

- i. The Public Health England review also included the most comprehensive estimate of the economic burden of gambling on society to date by looking at the following categories of harms: financial; relationship disruption, conflict or breakdown; mental and physical health; cultural; employment and education; and criminal activity. The review found that harms associated with gambling cost at least £1.27 billion in 2019 to 2020 in England alone. This analysis includes the first estimate of the economic cost of suicide (£619.2 million) and provides an updated cost of homelessness associated with harmful gambling (£62.8 million).
- ii. Sheffield accounts for approximately 1% of the population of England, and demographically reflects the English average. This means the societal harms associated with gambling in Sheffield are likely to be in the region of £12.7 million each year including £6.1m through suicide and £628k through homelessness.
- iii. To add, gambling premises have a negative impact on the health of Sheffield's high streets. The Marmot Review: Ten Years On report identified a higher concentration of gambling premises on high streets as the sign of an "unhealthy high street", widening inequalities for the most vulnerable, and leading to poor mental and physical health.<sup>10</sup>

### **Endnotes**

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<sup>1</sup> While 3.8% of people in the general population gamble at levels of elevated risk, this increases to 6.1% in those who are unemployed.<sup>2</sup>

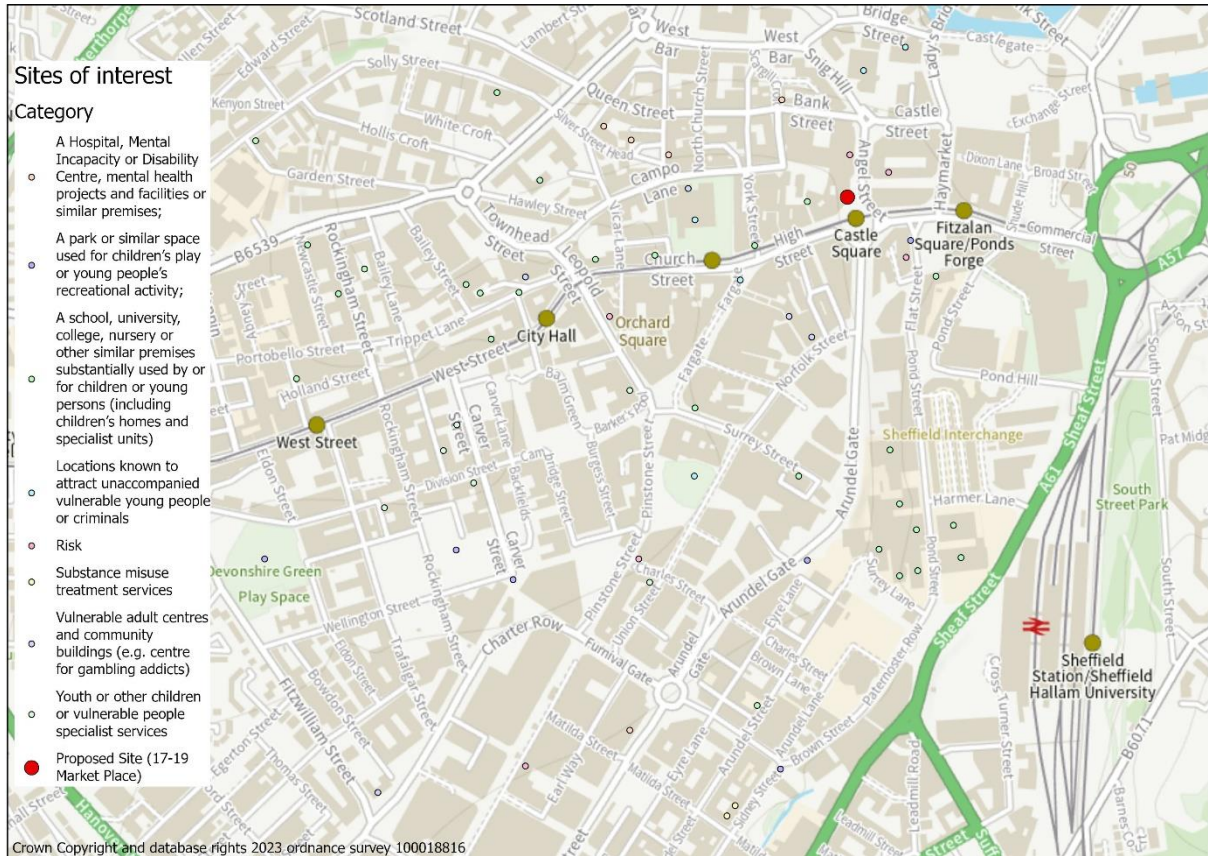
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<sup>10</sup> Institute of Health Equity, [Health Equity in England: The Marmot Review 10 Years On - The Health Foundation](#), Healthy Equity in England: The Marmot Review 10 Years On, February 2020.

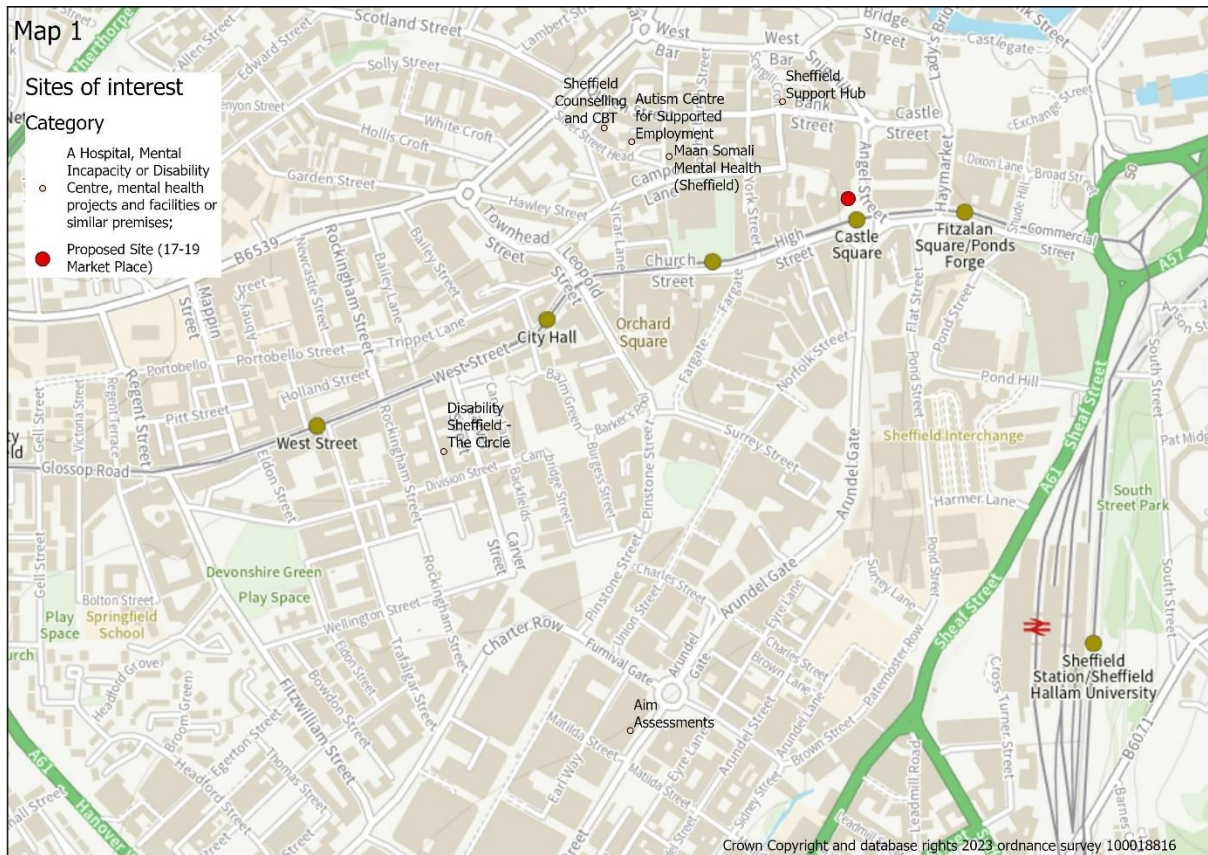
# ANNEX 1

## SENSITIVE LOCATIONS AND AREAS OF RISK CLOSE TO PROPOSED BET EXTRA SITE

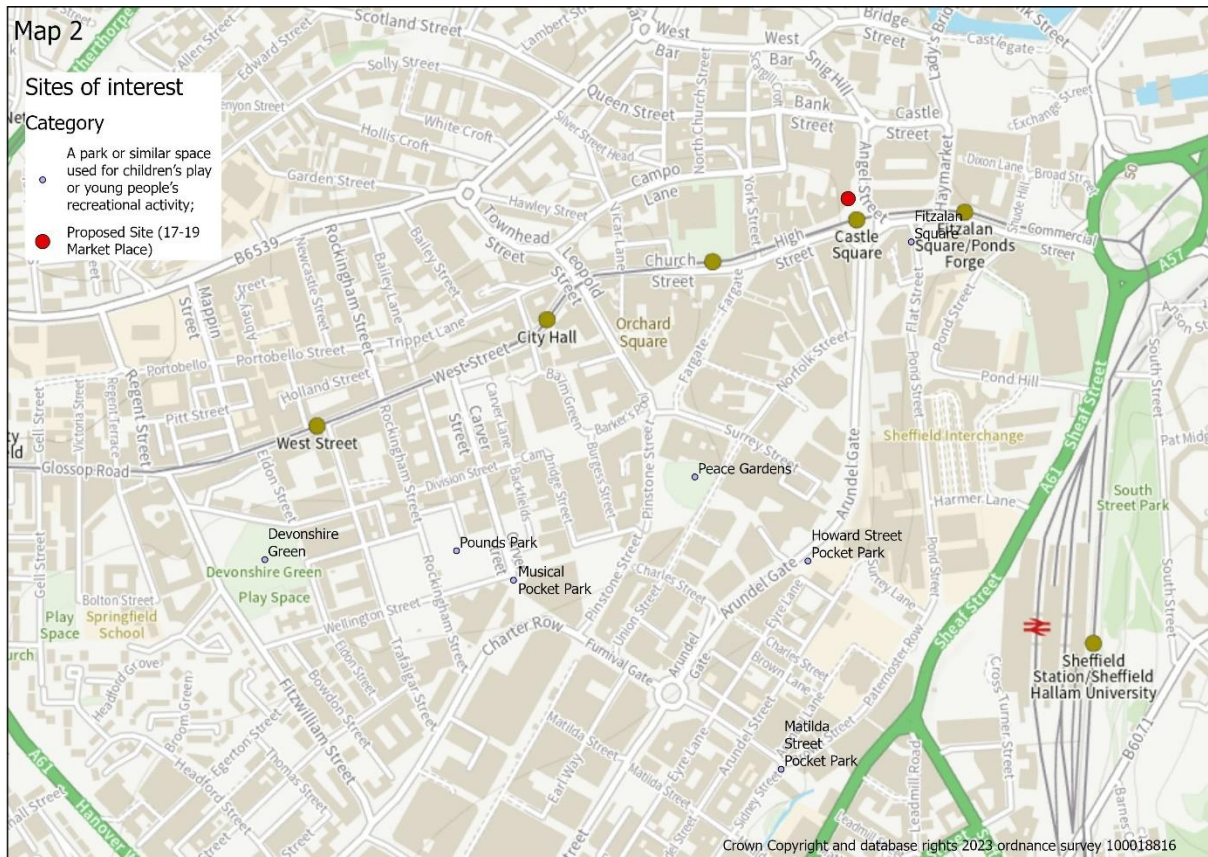
### Overarching map – all sensitive locations and risk



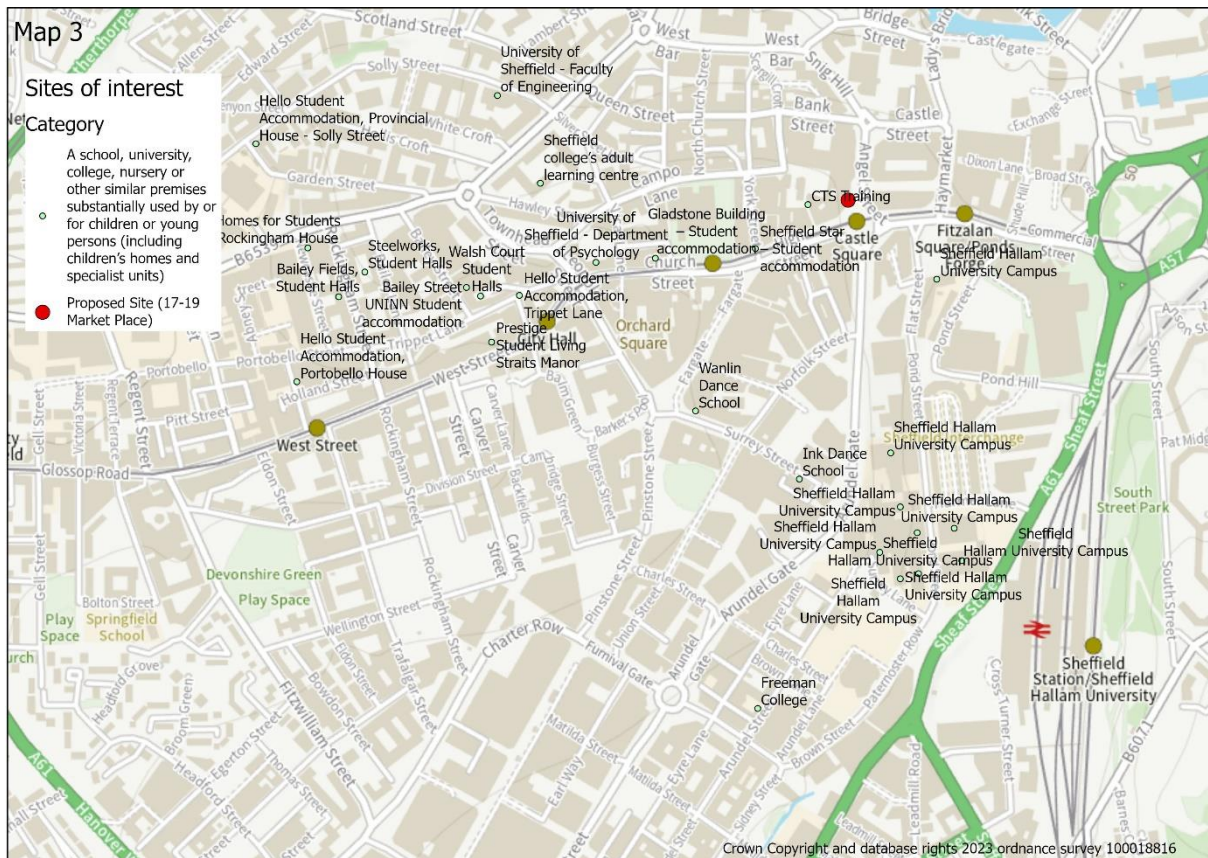
# Map 1 - a Hospital, Mental Incapacity or Disability Centre, mental health projects and facilities or similar premises



**Map 2 - a park or similar space used for children's play or young people's recreational activity**

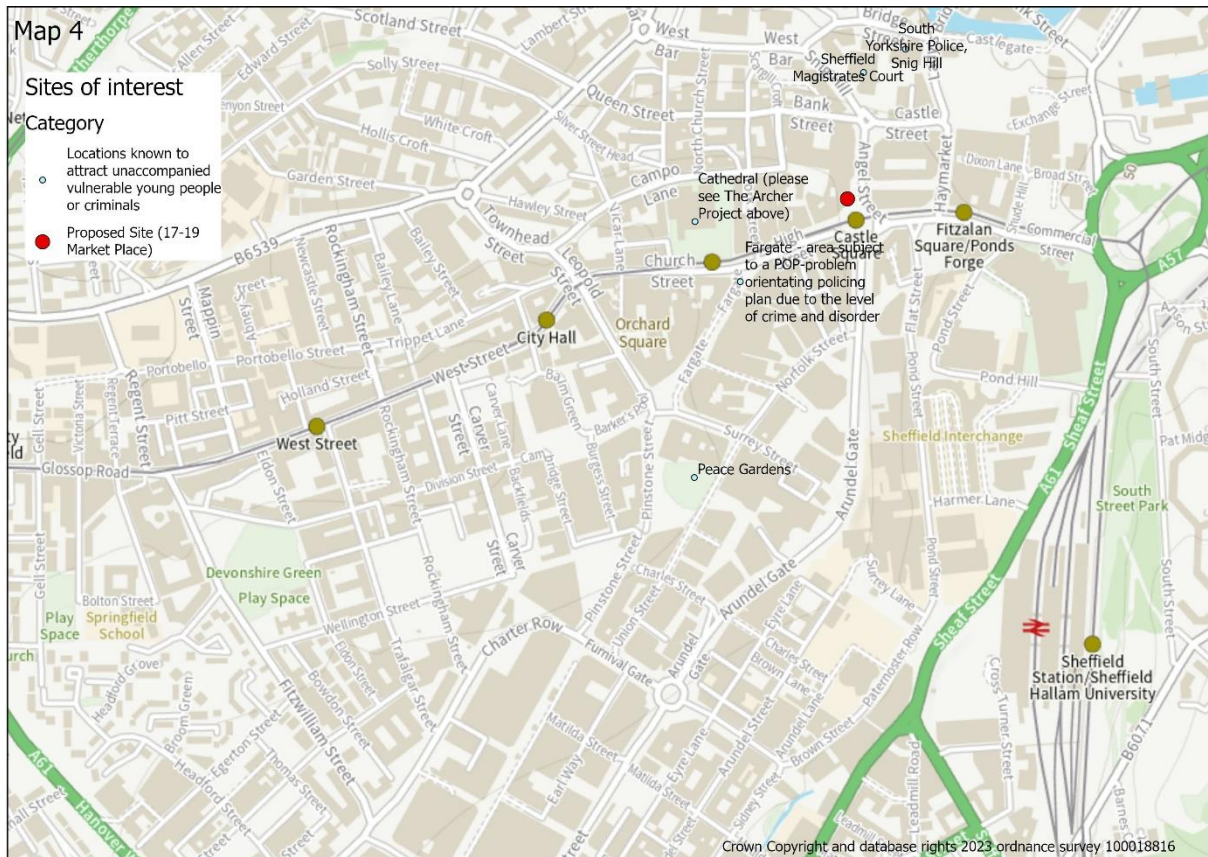


**Map 3 – a school, university, college, nursery or other similar premises substantially used by or for children or young persons (including children’s homes and specialist units)**

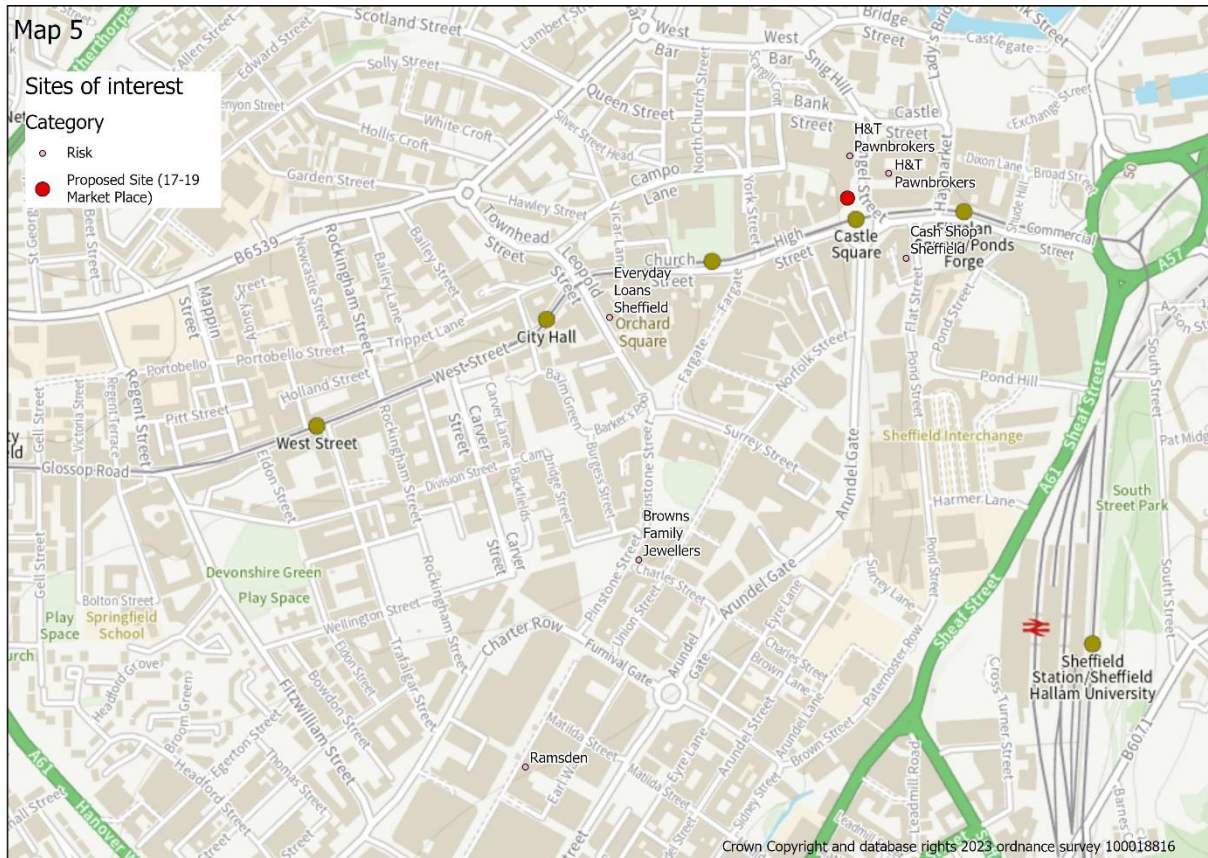




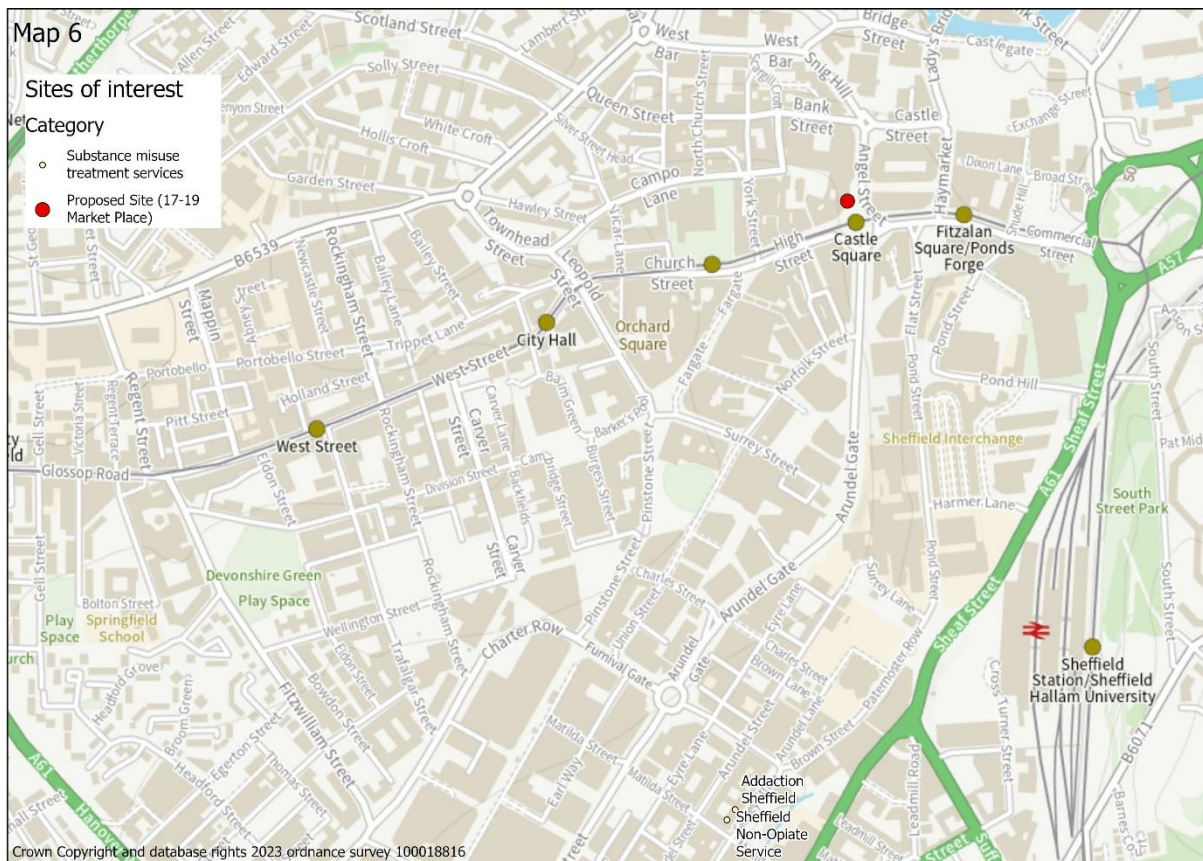
**Map 4 - locations known to attract unaccompanied vulnerable young people or criminals**



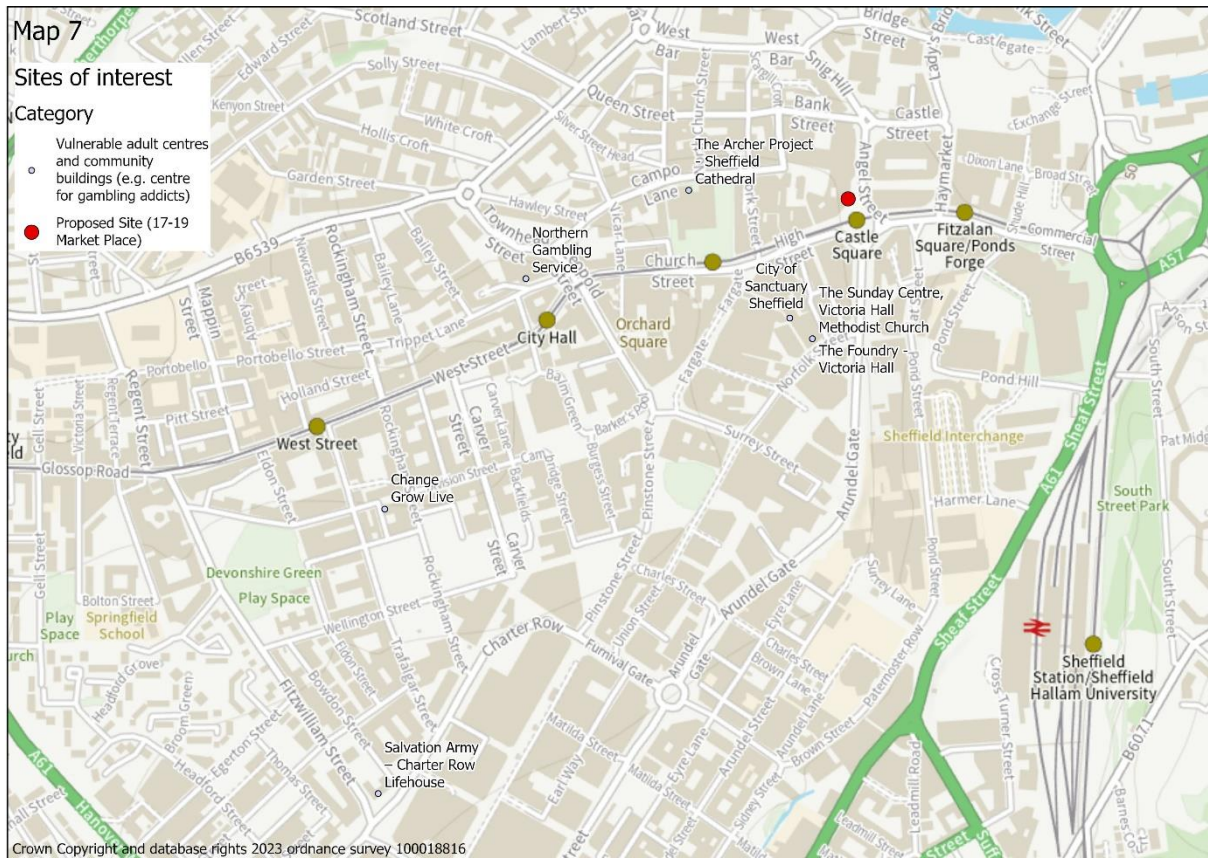
## Map 5 – risk



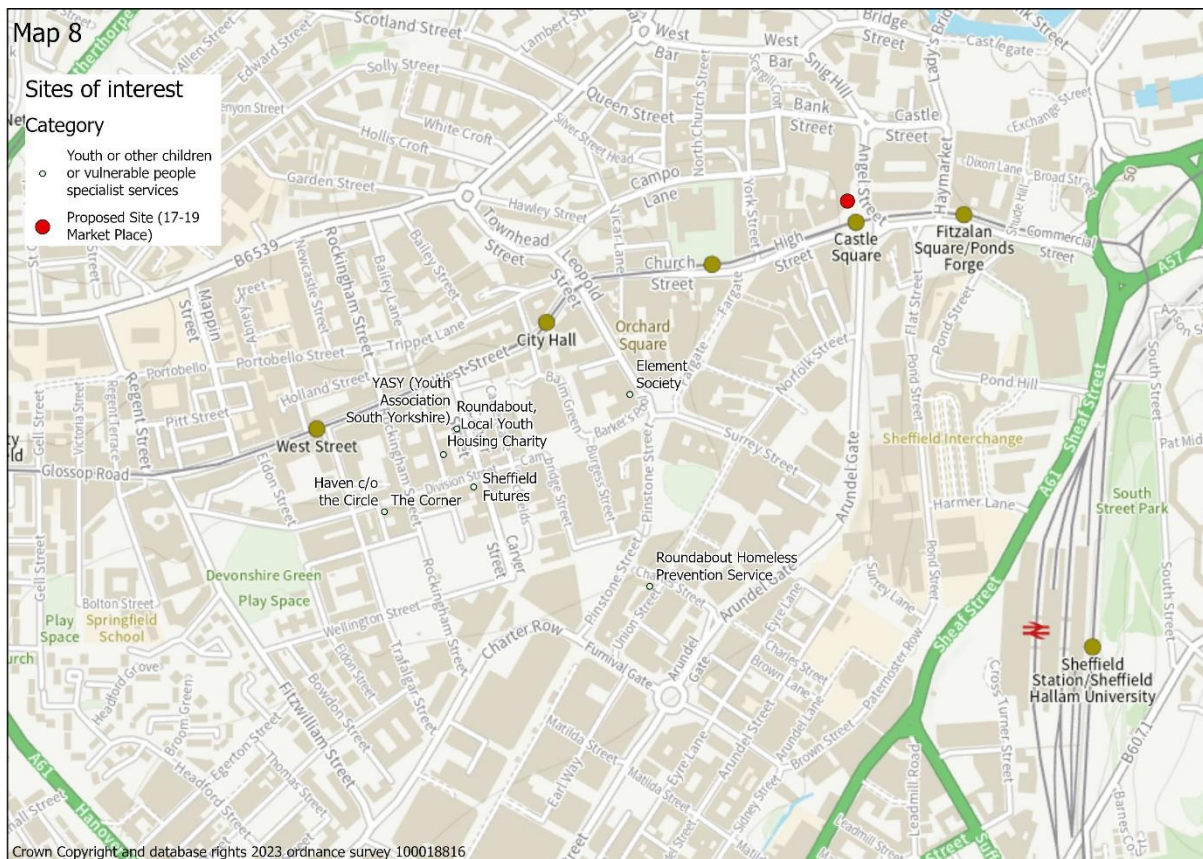
## Map 6 - substance misuse treatment services



## Map 7 – vulnerable adult centres and community buildings (e.g. centre for gambling addicts)



## Map 8 - youth or other children or vulnerable people specialist services



## Annex 1 – List of sensitive locations and areas of risk close to proposed Bet Extra site

Date: November 2023

### Sheffield City Council’s Statement of Licensing Policy 2022

Policy paragraph 5.2 – Location

Policy paragraph 5.4 – Risk

#### Sensitive Building, Location, Risk and Area Policy Mapping around 17-19 Market Street, Sheffield, S1 2GH

Search Engine used	Google
Key word searches used	<p>“Sheffield City Centre” and then:  “school” “university” “young person” “childrens homes” “student accommodation” “student halls” “park” “disability”  “mental health” “hospital” “vulnerable adults” “substance misuse” “children services” “money lending” “pawn broker”</p>
<p><b>Policy 5.2 Location:</b>  a school, university, college, nursery or other similar premises substantially used by or for children or young persons (including children’s homes and specialist units)</p>	
	<ul style="list-style-type: none"> <li>• <a href="#">Sheffield Hallam University – City Campus</a> - 38-40 Howard St, Sheffield City Centre, Sheffield S1 1WB</li> <li>• <a href="#">Sheffield Hallam University – City Campus - Sheffield Business School</a> - 38-40 Howard St, Sheffield City Centre, Sheffield S1 1WB</li> <li>• <a href="#">Sheffield Hallam University – City Campus - Sheffield Institute of Education</a> - Charles St, Sheffield City Centre, Sheffield S1 2LX</li> <li>• <a href="#">Sheffield Hallam University – City Campus - Sheffield Institute of Arts</a> – Fitzalan Square, S1 2AY</li> <li>• <a href="#">Sheffield Hallam University – Students Union</a> - 6 Paternoster Row, Sheffield, S1 2QQ</li> <li>• <a href="#">Wanlin Dance School</a> - Surrey St, Sheffield City Centre, Sheffield S1 2LG (all ages)</li> <li>• <a href="#">Freeman College</a> - Sterling Works, 88 Arundel St, Sheffield City Centre, Sheffield S1 2NG</li> <li>• <a href="#">Ink Dance School</a> – TFC building, 94 Surrey Street, Sheffield, S1 2LG (all ages)</li> <li>• <a href="#">University of Sheffield - Department of Psychology</a> – Cathedral Court, 1 Vicar lane, Sheffield City Centre, S1 2LT</li> <li>• <a href="#">University of Sheffield - Faculty of Engineering</a> – 3 Solly Street, Sheffield City Centre, S1 4DE</li> <li>• <a href="#">Sheffield college’s adult learning centre</a> – 18 Hawley Street, S1 2EE</li> <li>• <a href="#">CTS Training.</a> - 24-26 High Court, Sheffield City Centre, S1 2EP</li> </ul> <p><b>Student Accommodation/Halls</b></p> <ul style="list-style-type: none"> <li>• <a href="#">Gladstone Building</a> – Student accommodation – 1 St James Row, Sheffield City Centre, S1 2EU</li> <li>• <a href="#">Sheffield Star</a> – Student accommodation, Star Resident, York Street, Sheffield City Centre, S1 2ER</li> <li>• <a href="#">Prestige Student Living Straits Manor</a> - 52 West street, Sheffield City Centre, S1 4FD</li> </ul>

- [Hello Student Accommodation, Trippet Lane](#) - 1 Penton Street, Sheffield City Centre, S1 4EL
- [Hello Student Accommodation, Provincial House](#) - Solly Street, Sheffield City Centre, S1 4FE
- [Hello Student Accommodation, Portobello House](#) - 3 Portabello Street, Sheffield, S1 4EL
- [Walsh Court Student Halls](#) - 23-27 Trippet Lane, Sheffield City Centre, S1 4EL
- [Bailey Street UNINN Student accommodation](#) - 39 Bailey Street, Sheffield, S1 1TY
- [Steelworks, Student Halls](#) - 29 Rockingham Street, Sheffield City Centre, S1 4WB
- [Bailey Fields, Student Halls](#) - 4 Rockingham Street, Sheffield City Centre, S1 4TT
- [Homes for Students Rockingham House](#) - 1 Newcastle Street, Sheffield City Centre, S1 3PD

**Policy 5.2 Location:**

- a park or similar space used for children's play or young people's recreational activity;

**Parks**

- Peace Gardens, Sheffield City Centre, 50 Pinstone Street, Sheffield City Centre, S1 2HH
- Pounds Park, Sheffield City Centre, S1 4GE
- Devonshire Green, 158 Devonshire Street, Sheffield City Centre, S1 4GT
- Fitzalan Square (park and garden), Sheffield City Centre, S1 2GD
- Pocket parks
  - Musical Pocket Park, Charter Square, Sheffield City Centre, S1 4HS
  - Matilda Street Pocket Park, 1 Sidney Street, Sheffield City Centre, S1 4RG
  - Howard Street Pocket Park, 48 Howard Street, Sheffield City Centre, S1 1WB

**Policy 5.2 Location:**

- a Hospital, Mental Incapacity or Disability Centre, mental health projects and facilities or similar premises;

**Disability Services and Support Organisations**

- [Disability Sheffield](#) - The Circle, 33 Rockingham Lane, Sheffield City Centre, S1 4FW
- [Autism Centre for Supported Employment](#) - 22 Paradise Square, Sheffield City Centre, S1 2DE
- [Aim Assessments](#) - 32 Eyre Street, Sheffield City Centre, S1 4QZ

**Mental Health Services / Projects / Facilities**

- [Sheffield Support Hub](#) – 44 Bank Street, Sheffield, S1 2DS
- [Maan Somali Mental Health \(Sheffield\)](#) – 8 Paradise Street, Sheffield, S1 2DF
- [Sheffield Counselling and CBT](#) - Courtwood House, Silver Street, S1 2DU

**Policy 5.2 Location:**

<ul style="list-style-type: none"> <li><b>vulnerable adult centres and community buildings (e.g. centre for gambling addicts)</b></li> </ul>	
	<ul style="list-style-type: none"> <li><a href="#">Change Grow Live</a> – 91 Division Street, Sheffield S1 4GE</li> <li><a href="#">The Sunday Centre, Victoria Hall Methodist Church</a> - Norfolk Street, Sheffield City Centre, S1 2JB</li> <li><a href="#">Salvation Army – Charter Row Lifehouse</a> - 126 Charter Row, Sheffield, S1 4HR</li> <li><a href="#">The Archer Project</a> - Sheffield Cathedral, Church Street, Sheffield S1 2EF</li> <li><a href="#">The Foundry</a> - Victoria Hall, Norfolk Street, Sheffield S1 2JB</li> <li><a href="#">City of Sanctuary Sheffield</a> - The Sanctuary, 37-39 Chapel Walk, Sheffield City Centre, S1 2PD</li> </ul>
<b>Policy 5.2 Location:</b> <ul style="list-style-type: none"> <li><b>substance misuse treatment services</b></li> </ul>	
	<ul style="list-style-type: none"> <li><a href="#">Addaction Sheffield</a>, 42 Sidney Street, Sheffield City Centre, S1 4RH</li> <li><a href="#">Sheffield Non-Opiate Service</a>, 44 Sidney Street, Sheffield City Centre, S1 4RH</li> </ul>
<b>Policy 5.2 Location:</b> <ul style="list-style-type: none"> <li><b>youth or other children or vulnerable people specialist services</b></li> </ul>	
	<ul style="list-style-type: none"> <li><a href="#">Sheffield Futures</a>, Star House, 43 Division Street, Sheffield City Centre, S1 4GE</li> <li><a href="#">The Corner</a>, 91 Division Street, S1 4GE</li> <li><a href="#">Element Society</a>, Yorkshire House, 66 Leopold Street, Sheffield City Centre, S1 2GZ</li> <li><a href="#">Roundabout</a>, Local Youth Housing Charity – The Circle, 33 Rockingham Lane, Sheffield City Centre, S1 4FW</li> <li><a href="#">Roundabout Homeless Prevention Service</a>, 22 Union Street, Sheffield City Centre, S1 2JP</li> <li><a href="#">YASY (Youth Association South Yorkshire)</a>, 10 Carver Street, Sheffield City Centre, S 1 4FS</li> <li><a href="#">Haven</a> c/o the Circle, 33 Rockingham Lane, Sheffield, S1 4FW</li> </ul>
<b>Policy 5.2 Location:</b> <ul style="list-style-type: none"> <li><b>locations known to attract unaccompanied vulnerable young people or criminals</b></li> </ul>	
	<ul style="list-style-type: none"> <li>Cathedral (please see <a href="#">The Archer Project</a> above)</li> <li>Fargate - area subject to a POP-problem orientating policing plan due to the level of crime and disorder</li> <li>Peace Gardens</li> <li><a href="#">South Yorkshire Police</a>, Snig Hill, Sheffield, S3 8LY</li> <li><a href="#">Sheffield Magistrates Court</a>, Castle Street, Sheffield City Centre, S3 8LU</li> </ul>
<b>Policy paragraph 5.4 – Risk</b>	



- Whether the premises is in an area subject to high levels of crime and/or disorder
- Location of areas/buildings that attract or involve the presence of children and vulnerable people (e.g. schools, colleges, universities, leisure centres, certain shops, children's homes, substance misuse treatment services or other specialist services for children and vulnerable people; money lending organisations etc) (- see location lists above)
- Demographics of the area and in particular to vulnerable groups (eg the location of the premises in deprived areas, level of social housing, or location in relation to money lending businesses)
- Location of services for vulnerable groups in the area (- see location list above)
- Deprivation of local area (at the very least the Ward area)
- Local policies and strategies to assist in the promotion of the licensing objectives (see Policy paragraph 5.5 – Area below)

- Levels of Crime and Disorder in proposed area: [Sheffield Central and North West | Police.uk \(www.polic.uk\)](http://www.polic.uk) (search based on premises post code)
- City Ward Profile: [City.pdf \(sheffield.gov.uk\)](http://www.sheffield.gov.uk)
- Local Insight profile (Sheffield Wards) for 'City' area – includes demographics and deprivation
- Usage of central area: [udp-map-10-central-area.pdf \(sheffield.gov.uk\)](http://www.sheffield.gov.uk)

**Money lending organisations:**

- [Everyday Loans Sheffield](#), First Floor Abbey House, 1 Leopold Street, Sheffield City Centre, S1 2GY
- [Cash Shop Sheffield](#), 2-4 Fitzalan Square, Sheffield, S1 2AZ
- [H&T Pawnbrokers](#), The Kiosk, 1-13 Angel Street, Sheffield City Centre, S3 8LN
- [H&T Pawnbrokers](#), 27 King Street, Sheffield City Centre, S3 8LF
- [Ramsden](#), The Moor, Sheffield City Centre, S1 4PF
- [Browns Family Jewellers](#), 107 Pinstone Street, Sheffield City Centre, S1 2HJ

## The Licensing Authority (Responsible Authority)

**From:** [REDACTED]  
**Sent:** Wednesday, November 22, 2023 9:29 PM  
**To:** licensingservice <licensingservice@sheffield.gov.uk>  
**Subject:** Bet Extra, 17-19 Market Place, Castlegate

Good evening Licensing Service,

Please accept this email as my formal representation made against the above premises in my capacity as an Authorised Officer for the Licensing Authority as a Responsible Authority under the Gambling Act 2005.

I wish to formally object to the application on the grounds that the applicants local authority risk assessment fails to address the local area profiling as per section 7.12.2 of Sheffield City Councils Statement of Principles for the Gambling Act 2005. It fails to acknowledge nearby sensitive building location, in particular the young and vulnerable persons.

Market Place is located within Sheffield City Centre that is used as a main transport link for school children to get to and from school. College students utilising the same transport links. The premises is located less than 500 yards from a Mcdonalds situated on High Street, 100 yards to Quasar(laser games) on Bank Street, 300 yards to the Show Cinema and located directly across from the National Videogame Museum on Angel Street. These businesses are frequented by a wide demographic including teenagers who often 'hang out' and cluster in and around these premises. In addition the City Centre is densely populated by student accommodation.

There are a number of different organisations located very close to, or which would be accessed by passing the proposed premises; to name a few: The Archer Project, The Foundry and Victoria Hall, who offer support for people on a range of different matters, as well as those with a gambling addiction. Given that the city centre is one of the most directly accessible areas as a result of the transport infrastructure (bus, train, tram, etc.), there are a number of agencies and organisations that work in and from the homeless, and those seeking treatment for drug or alcohol addiction, as well as other addictions.

Contrary to the above, the applicant states within the Risk Assessment that there are no facilities for problem gambling in the vicinity.

South Yorkshire Police consider the area to be a '*main hotspot area for violence*'. The Applicant has failed to highlight this within their Risk Assessment nor provide steps on how this will be monitored / managed.

Kind Regards,

[REDACTED]  
✉: **Licensing Enforcement & Technical Officer**

Licensing | Streetscene and Regulation  
Block C | Staniforth Road Depot |  
Staniforth Road | Sheffield | S9 3HD

## Green Party City Ward Councillors

**From:** Ruth Mersereau (CLLR) [REDACTED]  
**Sent:** Friday, November 10, 2023 2:03 PM  
**To:** licensingservice <licensingservice@sheffield.gov.uk>  
**Cc:** [REDACTED] Douglas Johnson (CLLR) [REDACTED] Douglas Johnson (GN CLLR) [REDACTED]; Martin Phipps (CLLR) [REDACTED]; Ruth Mersereau (CLLR) [REDACTED]  
**Subject:** Objection to application for BetExtra License - 17-19 Market Place

Dear Colleague

The three City Ward councillors would like to strongly object to the application to grant a license for a gambling establishment at 17-19 Market Place.

There is evidence to show that gambling can be a significant cause of harm to human health and wellbeing. And, as has been noted in previous objections by Public Health to nearby proposal for gambling shops in Haymarket and Fargate, there are a number of land-based gambling premises already existing in the area.

Gambling shops in the city centre have attracted anti-social behaviour which has deteriorated the area, and taken significant resource to address. This is in direct conflict with the council's aims to regenerate the area through the Future High Street Scheme.

It also will likely disturb residents living in the vicinity, and runs counter to the council's aim to encourage more people to live in the city centre. Anti-social behaviour makes the city centre a worse place to live as well as visit, as well as incurring additional costs and resource to address.

Officers noted about nearby Fitzalan Square: 'Fitzalan square has had significant reinvestment to improve amenities and the former Post Office is a Sheffield Hallam University site. However, despite some reductions in gambling establishments since the redevelopment it remains an area which has proliferation of gambling and high cost credit in close proximity to sensitive receptors and sensitive locations.'

People likely to be the most negatively affected by this potential premises include people at risk, including children, young adults and people with addictions and gambling related harms. Harmful gambling is related to health inequalities. The most socio-economically deprived and disadvantaged groups in England have the lowest gambling participation rates, but the highest levels of harmful gambling and they are also the most susceptible to harm.

The proposed location is close to areas of high deprivation, as noted in the public health objection to the nearby gambling shop applications.

In addition Public Health officers identified 4 sensitive receptors and locations near the Haymarket location, which applies also to this application:

'The site visit identified types of sensitive locations in close proximity to the proposed site:

- South Yorkshire Police Snig Hill
- Sheffield Magistrates Court
- Sheffield Hallam University
- Pawnbrokers and cheque cashing/cash converter premises

The sensitive receptors at this site who are potentially more vulnerable to exposure to gambling premises and products are offenders (perhaps 13% prevalence of problem gambling) and young people.

Sheffield Street Outreach Network Meeting (05/10/22) noted concerns around the tendency for street

communities to gravitate towards (nearby Castlegate, Dixon Lane and Exchange Street) as a meeting point (therefore being vulnerable to criminal behaviour in the area such as drug dealing). Many people involved in the street community have substance misuse and other mental health difficulties.'

Many universities students live nearby the proposed location, as well as nearby Sheffield Hallam University facilities, such as on Fitzalan Square. From the same government gambling publication: 'The highest rates of gambling participation are among people who have higher academic qualifications, people who are employed, and among relatively less deprived groups. People who are classified as at-risk and problem gamblers are more typically male and in younger age groups.'

As well as detriment to the area through attracting anti-social behaviour, we believe a gambling shop in this location would also pose a material risk to the health and wellbeing of vulnerable people, from students to people who may suffer from drug addiction, be rough sleeping and/or homeless, who may use the service.

Adding another gambling shop to this location, an area of known anti-social behaviour, will likely make this worse, as we have seen in Haymarket and Fitzalan Square previously, and also currently in High Street and Cathedral area.

We're also concerned that it would expose vulnerable people to gambling debt, such as students and people who may be suffering from drug addiction, rough sleeping and/or homelessness.

Ruth  
Ruth Mersereau  
Green Party Councillor for City Ward, Sheffield

**Mr C Ritchie – on behalf of ‘Gambling with Lives’ Charity and a local resident**

## Planning/Licensing Objection: Bet Extra, 17-19 Market Place, Castlegate

**Respondent:** O [REDACTED] Ritchie, [REDACTED]

Tel: [REDACTED]

Capacity: Interested party – local resident and frequent visitor to the city centre.

Representing: Self and Gambling with Lives (a Sheffield based charity)

**Licensing objective:** To protect children and other vulnerable people from being harmed or exploited by gambling.

We believe that the application for a licence should be rejected for 3 main reasons:

- the significant and widespread harms that it will bring to a substantial number of people in the city, both directly and indirectly;
- the direct harm that it will have on the immediate and long-term perception and prospects for the city, and the users of the establishment;
- the negative economic impact and harm that it will have for the whole population in Sheffield, as well as the users of the establishment.

### Gambling with Lives

Gambling with Lives (GwL) is a charity set up by families bereaved by gambling-related suicide that supports bereaved families, raises awareness of the devastating effects of gambling disorder, and campaigns for change. We also have an education programme which has been delivered in schools and other youth settings to thousands of young people. We are also delivering information and training to adults and professionals through our Chapter One website and programme.

### **Background and summary**

GwL was formed in Sheffield following the death of our son [REDACTED], who took his own life aged 24 in 2017, and another young Sheffield man, [REDACTED], who took his life just 6 months earlier. Both were bright, happy and popular young men with great futures ahead of them, whose only problem was their gambling disorder which they felt that they would never escape. Both were drawn into gambling while still at school/college in licensed betting venues.

Since that time we have been contacted by dozens of families who have lost loved ones to gambling related suicides. GwL has been a powerful voice in calling for and proposing effective gambling reform, providing unique insights on the dangers of gambling, what are the key issues to be addressed and what appropriate workable solutions should be.

GwL has shown that gambling disorder is not about weak or flawed individuals, but is caused by the widespread and easy availability of highly addictive products which are pushed as being “safe” or a “bit of fun”. While we accept that there are some people who are more at risk than others, either through social/economic or mental health reasons, harm from gambling is inevitable: “anyone can be addicted”.

**We strongly oppose the expansion of the gambling facilities at BetExtra, which will inevitably lead to increased levels of harm, particularly in poorer and vulnerable communities, and will be an unpopular and unwelcome presence in such a prime city centre site. The development will not produce net economic benefits to the city, instead it**

**will take more money out of poorer communities and concentrate wealth in the hands of a small number of owners.**

We address our concerns under 3 main headings:

1. Harms caused by availability of dangerous addictive products
2. The site of the proposed development
3. Economic costs and wider harms

#### 1. Harms caused by availability of highly dangerous addictive products

The current shop offers 'traditional' counter-based sports betting, casino/slots through Fixed Odds Betting Terminals (FOBTs), and betting through Self Service Betting Terminals (SSBTs). While all gambling carries a risk, it is now widely accepted that some products are much more dangerous than others: FOBTs and SSBTs are amongst the most dangerous products, with addiction/at-risk rates higher than heroin. We do not believe that it is responsible for the Council to allow more highly dangerous products to be easily available on the high street and promoted as 'a bit of fun'.

FOBTs – once dubbed the 'crack cocaine' of gambling, FOBTs were the first gambling product that the government decided was too dangerous to be on the high street. [Addiction/at risk rates were over 50%](#). [Numerous studies](#) have shown that these products were particularly associated with addiction and harms, and that addiction occurred much [more rapidly than for other products](#). In 2019 the government reduced the maximum stake size from £100 to £2, but left the speed of play unchanged so that the product remained highly addictive, but with money lost at a slower rate. However, even now they are associated with gambling harms of [over 30%](#) by people who gamble in bookmakers and are seeking treatment for gambling problems.

SSBTs – while SSBTs have been available in bookmakers for a number of years, recently there has been [an increase in their number, presence and capability](#), as 'bricks and mortar' venues introduce more and more addictive products to match the online offer. The increase in number of SSBTs appears to be a major objective of this application. SSBTs are not classified as 'gaming machines' so that there is no restriction on the number in a bookmakers (unlike FOBTs which are limited to 4 in recognition of the danger of the products).

This light touch to regulation has meant that SSBTs have become known as the "[money launderers favourite](#)". They are now also able to offer 'in-play betting', which has transformed a relatively benign form of gambling (betting on a final result) into a non-stop betting opportunity where [addiction/at risk rates as high as 78%](#) have been recorded. Researchers have concluded that "[in-play betting should warrant specific regulatory attention and interventions](#)".

Numerous studies have highlighted that it is not only the addictiveness of individual products but their [accessibility and easy availability](#) which is one of the key factors in causing gambling addiction. This corresponds with the experience and wider contacts of GwL families where the vast majority of loved ones lost had started gambling on a highly dangerous gambling product in a setting or venue which was not flagged as being dangerous and the products themselves were portrayed as 'a bit of fun'. The NHS Northern Gambling Service estimates that at least a third of their clients seeking treatment have no other co-morbid conditions and whose gambling problems had begun with a 'random encounter' with a highly toxic gambling product.

The proposed expansion of BetExtra would put more of these highly dangerous products into the easy reach of a much larger number of people in a prominent high street venue with inevitable consequences of increased gambling harms. Recent research has found a close association between the ['total consumption' of gambling and the increase in gambling harms](#). Therefore, an increase in gambling generated by the premises (which is the obvious aim of the applicant) will

lead to an increase in the number of people harmed and the scale of that harm. This must not be allowed to happen, so that the licence application should be rejected on these grounds alone.

**We believe that the application should be rejected on the significant and widespread harms that it will bring to a substantial number of people in the city, both directly and indirectly.**

## 2. Site of the proposed development

### Procedures in the shop

I have visited the existing facility on a number of occasions in order to understand its current operations and assess the impact that an expansion would have on the area. I would not have recognised it from the 'risk assessment' document supplied by one of the Directors of the applicant.

The overall feel of the shop was 'run down' and 'shabby'. There appeared to be no particular respect for customers or concern for their comfort. On one occasion the toilet was 'out of order'.

I saw none of the interactions that were noted in the risk assessment:

- no customer interaction in respect of 'out of control gambling', despite clear signs of agitation and immersion affecting a number of customers;
- no recognition of signs of problem gambling, despite on more than one occasion a customer playing a FOBT non-stop for 30 minutes;
- similarly, this did not appear to alert the 'back office terminal' relating to time or spend: it is not clear what trigger levels are set;
- no 'clear lines of sight' – customer on FOBTs and SSBTs had their backs to the counter;
- no clear 'extra resources to entrance monitoring' between 3pm or 4pm on school/college days or anything at weekends.

I was not approached by a member of staff on any occasion, despite spending significant time in the shop while not engaging in any gambling activity.

### Prime location

Although the area around the shop is currently fairly run-down, it is an area which continues to be scheduled for significant redevelopment. It is a major gateway to the city for vehicles exiting the road system at Parkway roundabout and will greatly benefit the initial impressions of the city once it is completed.

Currently there are a large number of establishments which offer gambling facilities, with 3 bookmakers, 2 Slots Arcades/Adult Gaming Centres and Bingo Hall all within 150 yards of the proposed site. There is no shortage of opportunities to gamble for those who want to. There are also several pawnbrokers and cash/money shops. This gives the impression of a [poor run-down area](#) unlikely to inspire the first time or occasional visitor to stop and look around. It is a confirmation of the [concentration of bookmakers](#) in more deprived areas.

We understand that the Council will take a long-term view on the redevelopment of this part of the city and we believe that allowing one of the prime locations, equivalent to 3 shop fronts on the iconic Castle Square, to be taken over by a bookmakers would send out all the wrong signals about the current status and future aspiration of the city as a whole.

It would also go against the likely strong wishes of the people of Sheffield. The arrival or expansion of bookmakers in any area almost always generates significant public protest. This is because people know through their own experience what harm is caused directly by gambling itself: it is



estimated that [20% of the population](#) are directly or indirectly harmed by gambling. But they are also aware of all of the [social problems](#) which occur in the vicinity of gambling establishments. It is for good reason that bookmakers are [the establishment that people least want](#) on their High Street by a huge margin.

**Therefore, we believe that the application should be rejected because of the direct harm that it will have on the immediate and long term perception and prospects for the city, and the users of the establishment.**

### 3. Economic costs and wider harms

While the application does not appear to make an economic case for the expansion of the existing site, I believe that it is important to note the 'hidden' economic costs of gambling and wider harms caused. It is clear that the shop itself would supply very little increase in the number of jobs. Indeed, given that it is an expansion of existing premises, it is not clear that it would lead to any increase in jobs at all. In either case, cashier/sales jobs in bookmakers tend to pay barely around the NLW and are [unpopular](#). And it is clear that gambling generally transfers wealth from the [poor to the rich and increases inequalities](#)

Over recent years there have been a number of UK and international studies which have attempted to estimate the wider public and social cost of gambling. All have found that there are substantial costs to the public purse in terms of health, welfare and employment, housing, crime and criminal justice

- [Gambling Harms Evidence Review](#) (OHID – 2023) – estimated public costs up to £1.77 bn a year
- [The Fiscal Costs and Benefits of Gambling](#) (NIESR – 2023) – estimated public costs up to £1.4 bn a year
- [The societal costs of gambling in Sweden](#) (2020) – found that societal costs were twice as high as tax revenues
- [Cards on the Table](#) (IPPR – 2016) – estimated up public costs to £1.16 bn a year

All of the above studies noted that the costs would be substantial underestimates because of the difficulty in measuring the scale of most harms and the further difficulty in putting a financial cost on many harms which did not have a direct identifiable impact on the public purse. These costs are borne by families, employers and the wider public, such as impact on families and relationships, productivity at work, and others.

Furthermore, many UK and international studies have shown that £1 spent in almost any sphere of economic activity has a much greater 'multiplier effect' than gambling, because of the relatively short 'supply chain' for gambling. For instance, the vast majority of money lost in a local bookmakers is spent on electronic products (such as FOBTs and SSBTs) which are supplied and operated remotely with profits being reaped far from Sheffield. Example studies include:

- [Reducing problem gambling would mean more jobs and tax revenue](#) (SMF – 2021)
- [Economic assessment of selected House of Lords gambling reforms](#) (NERA – 2021)
- [The South Australian Gambling Industry](#) (Univ of Adelaide – 2006) – found that every \$1m spent on gaming machines generated just 3 jobs, compared to twice that in retail and four times that in hospitality.

**Therefore, we believe that the application should be rejected on the negative economic impact that it will have for the whole population in Sheffield, as well as the users of the establishment.**

**ChangingSheff – ‘The residents’ association for 27,000 people living within a radius of 750 metres of City Hall’**

**Objection to Bet Extra Expansion Licence at 17-19 Market Place, S1 2GH.  
Submitted by ChangingSheff – the residents’ association for Sheffield City  
Centre**

1. This objection is made on behalf of the city centre residents’ association, ChangingSheff. Our aim is to introduce changes that make the city centre a great place to live, as our population grows to 35,000 residents over the next 6 years through £500 million of investment in retail and residential development.
2. Our objection relates to one of the three conditions in licensing regulations **“preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime”**
3. Our residents association was the inspiration in 2015 of what became the Help us Help amalgamation of organisations aiming to support the street community and assist their rehabilitation. At the time the problem focused on the emergence of spice and its dreadful consequences.
4. Eight years later brings us to today and the remarkable amalgamation of 24 agencies that jointly provide support for those whose lives have caused them to choose a preference for being on the city centre streets. The agencies range from a volunteer soup kitchen to church-based groups to health and addiction professionals, the Archer Project, Ben's Centre and the City Council.
5. From the point of view of residents who live in the city centre this excellent coordination of resources has prevented the problem from growing out of control.
6. **But there remains a hard-core of people who will not avail themselves of the support that's offered.** Staying on the street in a city with a thriving night time economy and 60,000 students can be a useful source of income to fund an unhealthy lifestyle.
7. Which leads to some egregious forms of ASB. Regrettably, despite the best efforts of the Help us Help agencies, these problems are concentrated in the area of this application. The lower end of Fargate, High Street and the area around Castle Square and Angel Street. The Banker’s Draft is a particular hotspot where the street community congregates.
8. **Which is why we strongly oppose this location for an expansion of the current outlet.**
  - a. **The area is already “a source of crime and disorder” – despite the best efforts of all the agencies involved – see the photo at page 3 of a parked police vehicle.**
  - b. **Experience shows that a betting outlet encourages the street community to congregate.**
  - c. **Making it into a much larger facility right next to The Banker’s Draft is inviting more people to congregate in that location.**
  - d. **This will inevitably produce an expansion in anti-social behaviour right next to one of the busiest SuperTram stops in the city centre.**
9. On page 4 we show just a few of the public reports that have reached ChangingSheff about ASB in the area. It’s the proposed location of these much large premises that causes us great concern.
10. So moving from the **importance of the location** to the **influence of a much larger facility** on the people who congregate in this area, we have to consider the addiction issues.

11. In January 2021 a robbery at knifepoint took place at a Bet Extra outlet in Rotherham where the company is based. South Yorkshire Police released CCTV video footage after the armed robbery
12. An online comment on Google reviews from two years ago relating to the current outlet states *'Smells like a brewery. Loads of drunk people smelling the place out'*
13. Which doesn't suggest this facility is going to improve the location at a time when the Council is investing heavily to improve the area.
14. Our experience from the gambling outlets nearby in Fitzalan Square shows how these opportunities draw in a hard-core street community that doesn't respond to the availability of support. Which leads to an increase in anti-social behaviour.
15. Police resources are already stretched by the current situation around Fargate, High Street and the Cathedral and experience suggests that expanding the Bet Extra premises by such a large extent would make the problems worse. Fitzalan Square needed a complete make-over at considerable expense to remove concealed locations and lower the incidences of ASB.
16. Comments so far are based on our experience as a residents' association for people who live in the city centre. **However there has been substantial research on these issues, as explained in recent official reports. The Government's "Gambling-related Harms Evidence review"** – states *"The socio-demographic profile of gamblers appears to change as gambling risk increases, with harmful gambling associated with people who are unemployed and among people living in more deprived areas. This suggests harmful gambling is related to health inequalities\*"*.
17. **The people we are concerned about have SUBSTANTIAL health inequalities.**
18. This is an addictive product that is asking for permission to expand in our £500 million pound redevelopment of Sheffield City Centre.
  - a. The area is already the focus for addicted people with severe health inequalities.
  - b. The gambling industry is not a benevolent actor that aims to provide fun - it is designed to extract money by using products with highly addictive properties.
  - c. The interests of the industry are in conflict with those of public health, which means it is in conflict with the challenges we already face in Sheffield city centre.
19. Sheffield City Council was successful in the bid for Government Levelling-Up Funding in late 2021. This bid brought together three projects that respond directly to the Levelling-Up Fund's call to **'prioritise investment that not only brings economic benefits, but also helps bind communities together'**. It welcomes visitors, residents and investors into a previously neglected part of Sheffield's heritage, using public realm interventions to create a new sense of place. Furthermore, it links historic sites with revitalised cultural institutions that will nurture the city's talent for generations to come.
20. The three projects included in the Castlegate £20 million regeneration are:
  - a. The Castle site (previously the Castle Market area of the city)
  - b. Park Hill Art Space
  - c. Harmony Works
21. Expanding this betting facility so close to the Castle site and Harmony Works, when our experience shows how anti-social behaviour is drawn into such locations, would be a mistake.
22. In conclusion, the Licensing objective refers to **preventing gambling from being a source of crime or disorder, and prevent it from being associated with crime or disorder**. This area is a crime and disorder hotspot. Our resident complaints below

show how serious they are and our involvement with South Yorkshire Police confirms Castle Square as part of the problem.

23. We do not have an issue with the current outlet. Our objection is to the expansion of that outlet in an area with serious ASB problems at a time when the redevelopment will add tourism into what has long been a run-down area.
24. We know that research confirms that harmful gambling is related to health inequalities. The people who are causing problems in this area have SUBSTANTIAL health inequalities. We should not dangle this greater attraction in front of them.
25. **It's completely the wrong place for this expansion at this time and we, as ChangingSheff representing the residents, hope the Committee will agree with our views.**

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Licence conditions are one method by which it is possible to mitigate risks associated with a particular premises. The imposition of licence conditions might be prompted by locality specific concerns, in this case the level of ASB already existing in the locality.

\* Source: <https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary--2>



Police vehicle parked in King Street, across from Bet Extra, on 20<sup>th</sup> November 2023, highlighting the need to deter anti-social behaviour in this location



The much larger size of the proposed outlet

**Four recent independent expressions of concern from members of the public to ChangingSheff over the fears being generated in an area of Fargate, Cathedral, High Street.**

- a. "A friend of the wife of one of our committee members was walking up East Parade at the side of the Cathedral one recent lunchtime when she was approached by one of the 'street' community who started demanding money and behaving extremely aggressively and being intimidating right in her face. She ran away and he started to chase after her so she went into the reception of a solicitors. The receptionist asked if she could help and when she told her she said "Oh yes it's a massive problem, it happens all the time. We are always having to get the police out." This was at lunchtime - in the middle of the day - in broad daylight.
- b. "Apparently George Street (by the Curzon) is a favourite sleeping place for Street dwellers and some need stepping over to get by. I've also had a report of hordes of teenagers by McDonald's.
- c. "I'm getting more people with mental health issues at the Cathedral, sometimes tipping over to aggression, often with significant personal hygiene issues.
- d. "We've all seen an escalation of ASB recently - it might be worth asking if SCC, police and Help Us Help partners are aware of this and can they act?"

\*The Government's "Gambling-related Harms Evidence review – online at <https://www.gov.uk/government/publications/gambling-related-harms-evidence-review>

**Objection submitted by P J Sephton on behalf of ChangingSheff, the residents' association for 27,000 city centre occupants – [www.ChangingSheff.org](http://www.ChangingSheff.org)**

23-11-22-Objection to Bet Extra Expansion Licence

# Appendix 'C'

**Agreed Conditions - South Yorkshire Police**

## Agreed Conditions - South Yorkshire Police 30.10.23

- 1 A digital CCTV system installed to Home Office Guidance standards and maintained in a good working condition to ensure continuous quality of image capture and retention where:
  - (a) Cameras to be sited to observe the entrance doors from the inside.
  - (b) Cameras on the entrances must capture full frame shots of the heads and shoulders of all people entering the premises i.e. capable of identification.
  - (c) Cameras must be sited to cover all areas to which the public have access including any outside smoking area.
  - (d) Cameras must record whilst members of the public are frequenting the premises.
  - (e) CCTV system to be able to provide a linked recording of the date, time of any image
  - (f) CCTV system to have a monitor to review images and recordings
  - (g) a member of staff trained in operating CCTV to be at the venue during times open to the public
  - (h) CCTV footage must be kept for 31 days.
  - (i) CCTV equipment must have a suitable export method, e.g. CD/DVD writer / USB
  - (j) CCTV footage must be available within a reasonable time to Police on request.
  - (k) The CCTV footage will be controlled and kept in a secure environment to prevent tampering or unauthorised viewing. A record will be kept of who has access the system, the reason why and when.
  
- 2 An incident log shall be kept at the premises, it will be in a hardback durable format handwritten at the time of the incident or as near to as is reasonable and made available on request to the Police, which will record the following:
  - (a) all crimes reported to the venue
  - (b) all ejections of patrons
  - (c) any complaints received
  - (d) any incidents of disorder
  - (e) any faults in the CCTV system
  
- 3 To acquire a suitable number of radio sets for the premises and to take the CCRAC Radio Scheme (City Centre Retails Against Crime) into use at all times when trading, and continue to be a user whilst this system is in use within Sheffield.



# Appendix 'D'

**Notices of hearing, regulations and hearing procedure**

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**Notice of hearing of representations in respect of the following application:  
GA05 Premises Licence Application – Betting Premises**

To: [REDACTED] on behalf of Sheffield Children Safeguarding Partnership

Sent via email: [REDACTED]

The Sheffield City Council being the licensing authority, on the 25<sup>th</sup> October 2025 received an application for a premises licence in respect of the premises known as;

**Bet Extra, 17-19 Market Place, Sheffield, S1 2GH**

During the consultation period, the Council received representations from the following interested parties:

- **South Yorkshire Police (resolved with agreed conditions)**
- **Sheffield Children Safeguarding Partnership (Responsible Authority)**
- **The Licensing Authority (Responsible Authority)**
- **Green Party City Ward Councillors**
- **Charles Ritchie - Local Resident and Sheffield based Chairity ‘Gambling with Lives’**
- **ChangingSheff – Residents Association**

The Council now **GIVES YOU NOTICE** that the representations will be considered at a hearing to be held at **Sheffield Town Hall on Tuesday 27<sup>th</sup> February 2024 at 10.00am**; following which the Council will issue a notice of determination of the application.

The documents which accompany this notice are the relevant representations which have been made.

The particular points on which the Council considers that it will want clarification at the hearing from a party are as follows:

- 1) The representation you have made with reference to these particular premises and the licensing objectives / SCC’s Statement of Principles (Gambling Policy)/ Gambling Commission Guidance or the relevant codes of practice.
- 2) You may also be asked questions by the parties to the hearing, relating to your representation.

Please complete the attached ‘Notice of Attendance Form’ and return it to: **Licensing Service, Sheffield City Council, Block C Staniforth Road Depot, Staniforth Road, Sheffield, S9 3HD** within five (5) working days before the day or the first day on which the hearing is to be held.

Dated: 17<sup>th</sup> January 2024

Signed: Shimla Finch

The officer appointed for this purpose  
Licensing Strategy and Policy Officer

Please address any communications to: Licensing Service, Sheffield City Council, Block C Staniforth Road Depot Staniforth Road Sheffield S9 3HD. [licensing@sheffield.gov.uk](mailto:licensing@sheffield.gov.uk)

**Notice of hearing of representations in respect of the following application:  
GA05 Premises Licence Application – Betting Premises**

To: [REDACTED] on behalf of the Licensing Authority

Sent via email: [REDACTED]

The Sheffield City Council being the licensing authority, on the 25<sup>th</sup> October 2025 received an application for a premises licence in respect of the premises known as;

**Bet Extra, 17-19 Market Place, Sheffield, S1 2GH**

During the consultation period, the Council received representations from the following interested parties:

- **South Yorkshire Police (resolved with agreed conditions)**
- **Sheffield Children Safeguarding Partnership (Responsible Authority)**
- **The Licensing Authority (Responsible Authority)**
- **Green Party City Ward Councillors**
- **Charles Ritchie - Local Resident and Sheffield based Chairity ‘Gambling with Lives’**
- **ChangingSheff – Residents Association**

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- 1) The representation you have made with reference to these particular premises and the licensing objectives / SCC’s Statement of Principles (Gambling Policy)/ Gambling Commission Guidance or the relevant codes of practice.
- 2) You may also be asked questions by the parties to the hearing, relating to your representation.

Please complete the attached ‘Notice of Attendance Form’ and return it to: **Licensing Service, Sheffield City Council, Block C Staniforth Road Depot, Staniforth Road, Sheffield, S9 3HD** within five (5) working days before the day or the first day on which the hearing is to be held.

Dated: 17<sup>th</sup> January 2024

Signed: Shimla Finch  
The officer appointed for this purpose  
Licensing Strategy and Policy Officer

Please address any communications to: Licensing Service, Sheffield City Council, Block C Staniforth Road Depot Staniforth Road Sheffield S9 3HD. [licensing@sheffield.gov.uk](mailto:licensing@sheffield.gov.uk)

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**Notice of hearing of representations in respect of the following application:  
GA05 Premises Licence Application – Betting Premises**

To: **The Green Party City Ward Cllrs - Cllr Mersereau, Cllr Phipps and Cllr Johnson**

Sent via email:



The Sheffield City Council being the licensing authority, on the 25<sup>th</sup> October 2025 received an application for a premises licence in respect of the premises known as;

**Bet Extra, 17-19 Market Place, Sheffield, S1 2GH**

During the consultation period, the Council received representations from the following interested parties:

- **South Yorkshire Police (resolved with agreed conditions)**
- **Sheffield Children Safeguarding Partnership (Responsible Authority)**
- **The Licensing Authority (Responsible Authority)**
- **Green Party City Ward Councillors**
- **Charles Ritchie - Local Resident and Sheffield based Chairity ‘Gambling with Lives’**
- **ChangingSheff – Residents Association**

The Council now **GIVES YOU NOTICE** that the representations will be considered at a hearing to be held at **Sheffield Town Hall on Tuesday 27<sup>th</sup> February 2024 at 10.00am**; following which the Council will issue a notice of determination of the application.

The documents which accompany this notice are the relevant representations which have been made.

The particular points on which the Council considers that it will want clarification at the hearing from a party are as follows:

- 1) The representation you have made with reference to these particular premises and the licensing objectives / SCC’s Statement of Principles (Gambling Policy)/ Gambling Commission Guidance or the relevant codes of practice.
- 2) You may also be asked questions by the parties to the hearing, relating to your representation.

Please complete the attached ‘Notice of Attendance Form’ and return it to: **Licensing Service, Sheffield City Council, Block C Staniforth Road Depot, Staniforth Road, Sheffield, S9 3HD** within five (5) working days before the day or the first day on which the hearing is to be held.

Dated: 17<sup>th</sup> January 2024

Signed: Shimla Finch  
The officer appointed for this purpose  
Licensing Strategy and Policy Officer

**Notice of hearing of representations in respect of the following application:  
GA05 Premises Licence Application – Betting Premises**

To: Mr C [REDACTED] Ritchie – Local Resident and on behalf of Gambling With Lives Charity

Sent via email: [REDACTED]

The Sheffield City Council being the licensing authority, on the 25<sup>th</sup> October 2025 received an application for a premises licence in respect of the premises known as;

**Bet Extra, 17-19 Market Place, Sheffield, S1 2GH**

During the consultation period, the Council received representations from the following interested parties:

- **South Yorkshire Police (resolved with agreed conditions)**
- **Sheffield Children Safeguarding Partnership (Responsible Authority)**
- **The Licensing Authority (Responsible Authority)**
- **Green Party City Ward Councillors**
- **Charles Ritchie - Local Resident and Sheffield based Chairity ‘Gambling with Lives’**
- **ChangingSheff – Residents Association**

The Council now **GIVES YOU NOTICE** that the representations will be considered at a hearing to be held at **Sheffield Town Hall on Tuesday 27<sup>th</sup> February 2024 at 10.00am**; following which the Council will issue a notice of determination of the application.

The documents which accompany this notice are the relevant representations which have been made.

The particular points on which the Council considers that it will want clarification at the hearing from a party are as follows:

- 1) The representation you have made with reference to these particular premises and the licensing objectives / SCC’s Statement of Principles (Gambling Policy)/ Gambling Commission Guidance or the relevant codes of practice.
- 2) You may also be asked questions by the parties to the hearing, relating to your representation.

Please complete the attached ‘Notice of Attendance Form’ and return it to: **Licensing Service, Sheffield City Council, Block C Staniforth Road Depot, Staniforth Road, Sheffield, S9 3HD** within five (5) working days before the day or the first day on which the hearing is to be held.

Dated: 17<sup>th</sup> January 2024

Signed: Shimla Finch

The officer appointed for this purpose  
Licensing Strategy and Policy Officer

Please address any communications to: Licensing Service, Sheffield City Council, Block C Staniforth Road Depot Staniforth Road Sheffield S9 3HD. [licensing@sheffield.gov.uk](mailto:licensing@sheffield.gov.uk)

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**Notice of hearing of representations in respect of the following application:  
GA05 Premises Licence Application – Betting Premises**

To: Mr P [REDACTED] Sephton on behalf of ChangingSheff Residents Association

Sent via email: [REDACTED]

The Sheffield City Council being the licensing authority, on the 25<sup>th</sup> October 2025 received an application for a premises licence in respect of the premises known as;

**Bet Extra, 17-19 Market Place, Sheffield, S1 2GH**

During the consultation period, the Council received representations from the following interested parties:

- **South Yorkshire Police (resolved with agreed conditions)**
- **Sheffield Children Safeguarding Partnership (Responsible Authority)**
- **The Licensing Authority (Responsible Authority)**
- **Green Party City Ward Councillors**
- **Charles Ritchie - Local Resident and Sheffield based Chairity ‘Gambling with Lives’**
- **ChangingSheff – Residents Association**

The Council now **GIVES YOU NOTICE** that the representations will be considered at a hearing to be held at **Sheffield Town Hall on Tuesday 27<sup>th</sup> February 2024 at 10.00am**; following which the Council will issue a notice of determination of the application.

The documents which accompany this notice are the relevant representations which have been made.

The particular points on which the Council considers that it will want clarification at the hearing from a party are as follows:

- 1) The representation you have made with reference to these particular premises and the licensing objectives / SCC’s Statement of Principles (Gambling Policy)/ Gambling Commission Guidance or the relevant codes of practice.
- 2) You may also be asked questions by the parties to the hearing, relating to your representation.

Please complete the attached ‘Notice of Attendance Form’ and return it to: **Licensing Service, Sheffield City Council, Block C Staniforth Road Depot, Staniforth Road, Sheffield, S9 3HD** within five (5) working days before the day or the first day on which the hearing is to be held.

Dated: 17<sup>th</sup> January 2024

Signed: Shimla Finch  
The officer appointed for this purpose  
Licensing Strategy and Policy Officer

Please address any communications to: Licensing Service, Sheffield City Council, Block C Staniforth Road Depot Staniforth Road Sheffield S9 3HD. [licensing@sheffield.gov.uk](mailto:licensing@sheffield.gov.uk)

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**Notice of hearing of representations in respect of the following application:  
GA05 Premises Licence Application – Betting Premises**

To: **Mr Paddy Whur on behalf of Bet Extra Limited**

Sent via email: 

The Sheffield City Council being the licensing authority, on the 25<sup>th</sup> October 2023 received an application for a premises licence in respect of the premises known as;

**Bet Extra, 17-19 Market Place, Sheffield, S1 2GH**

During the consultation period, the Council received representations from the following interested parties:

- **South Yorkshire Police (resolved with agreed conditions)**
- **Sheffield Children Safeguarding Partnership (Responsible Authority)**
- **The Licensing Authority (Responsible Authority)**
- **Green Party City Ward Councillors**
- **C Ritchie - Local Resident and Sheffield based Charity 'Gambling with Lives'**
- **ChangingSheff – Residents Association**

The Council now **GIVES YOU NOTICE** that the representations will be considered at a hearing to be held at **Sheffield Town Hall on Tuesday 27<sup>th</sup> February 2024 at 10.00am**; following which the Council will issue a notice of determination of the application.

The documents which accompany this notice are the relevant representations which have been made.

The particular points on which the Council considers that it will want clarification at the hearing from a party are as follows:

- 1) Your response to the representations made, upon which you may ask and be asked questions by the parties to the hearing.
- 2) You may also be asked questions by the parties to the hearing, relating to your application for a licence.

Please complete the attached form LAR1 and return it to: **Licensing Service, Sheffield City Council, Block C Staniforth Road Depot, Staniforth Road, Sheffield, S9 3HD** within five (5) working days before the day or the first day on which the hearing is to be held.

Dated: 17<sup>th</sup> January 2024

Signed: Shimla Finch

The officer appointed for this purpose  
Licensing Strategy and Policy Officer

Please address any communications to: Licensing Service, Sheffield City Council, Block C Staniforth Road Depot Staniforth Road Sheffield S9 3HD. [licensing@sheffield.gov.uk](mailto:licensing@sheffield.gov.uk)

## **NOTES**

### **Right of attendance, assistance and representation**

A party may attend the hearing and may be assisted or represented by any person, whether or not that person is legally qualified.

The hearing will generally take place in public. However, the Sub-Committee may exclude the public from all or part of a hearing where it considers that the public interest in so doing outweighs the public interest in the hearing, or that part of the hearing, taking part in public. In such circumstances, a party and any person assisting or representing a party may be treated as a member of the public. The Sub-Committee will exclude the public (and the parties and their representatives) during the decision making process.

The Sub-Committee may require any person attending the hearing who in its opinion is behaving in a disruptive manner to leave the hearing, and may refuse to permit that person to return, or permit him to return only on such conditions as the Sub-Committee may specify. However, such a person may, before the end of the hearing, submit to the Sub-Committee in writing any information which he would have been entitled to give orally had he not been required to leave.

### **Representations and supporting information**

At the hearing a party shall be entitled to:

(a) Give further information as applicable in response to a point upon which notice has been given to that party that clarification is required. (Note – if such clarification is required from a party this will have been indicated in the Notice of Hearing).

(b) Question any other party, but only if given permission by the Sub-Committee; and

(c) Address the Sub-Committee

### **Failure of parties to attend the hearing**

If a party has given notice that he does not intend to attend or be represented at a hearing, the hearing may proceed in his absence.

If a party who has not so indicated fails to attend or be represented at a hearing, the Sub-Committee may, where it considers it to be necessary in the public interest, adjourn the hearing to a specified date, or hold the hearing in the party's absence. If the hearing proceeds in a party's absence, the Sub-Committee will consider and give appropriate weight to the application, representation or notice given by that party in their absence.

### **Representations and Evidence**

A party who wishes to rely on information or documentary evidence that has not been submitted in advance of the issue of the Notice of Hearing should ensure that such information or evidence, together with sufficient copies for all the parties, is submitted to the Licensing Authority as soon as possible before the day of the hearing.

Parties are reminded that documentary or other information submitted on the day of the hearing may only be taken into account with the consent of all the other parties.

A party who wishes to produce audio/visual evidence should make such evidence available as soon as practical, and should give a minimum of two clear working days notice to the Licensing Authority to facilitate arrangements for the appropriate equipment to be available at the hearing.

### **Procedure at hearing**

A summary of the procedure that will normally be followed at the hearing is enclosed.



It should be noted that this is a general procedure intended to cover matters that will normally be applicable at all hearings.

However, depending on the circumstances of each individual case, it is recognised that other issues may need to be considered as preliminary points at the hearing. These may include (but are not limited to):

- Whether to proceed in the absence of a party
- Whether to admit new documents/information submitted at the hearing
- Whether it is in the public interest to exclude members of the public from the hearing or any part of the hearing (other than the decision making process)
- Whether any party wished to withdraw representations previously submitted

### **Special Needs**

Any person who intends to attend a hearing and who has special needs, for example in connection with access, language, hearing or vision, should inform the Licensing Authority as soon as practical prior to the day of the hearing, so that appropriate provision or arrangements may be made.

**GAMBLING ACT 2005**

Premises: **Bet Extra, 17-19 Market Place, Sheffield, S1 2GH**  
Hearing Date: **Tuesday, 27<sup>th</sup> February 2024 at 10am**  
Application Type: **Grant of Premises Licence – Betting Premises**

**NOTICE OF ATTENDANCE FORM**

**Notice of actions following receipt of notice of hearing**

To **Licensing Service,  
Sheffield City Council  
Block C Staniforth Road Depot  
Staniforth Road  
Sheffield  
S9 3HD**

I/We **[REDACTED]** on behalf of **Bet Extra Limited**

hereby confirm that we have received the Notice of Hearing dated 17<sup>th</sup> January 2024 and notify you as follows **(please complete)**:

I intend to attend the hearing on **Tuesday 27<sup>th</sup> February 2024 at 10.00am** at **Sheffield Town Hall.**

I/We do not intend to attend the hearing.

I/We intend to be represented at the hearing by: .....

I/We consider the hearing to be unnecessary because: .....  
.....

I/We request that .....should appear at the hearing and set out below the point or points on which this person may be able to assist the authority in relation to this application, representations or notice of the party making the request.

Dated: ..... Signed.....

**Please see Regulations overleaf**

Please complete this form and return it to:  
Licensing Service, Sheffield City Council, Block C Staniforth Road Depot, Staniforth Road, Sheffield, S9 3HD.

[licensing@sheffield.gov.uk](mailto:licensing@sheffield.gov.uk)

## Regulations

### Failure of parties to attend the hearing

10. (1) A relevant committee may proceed with a hearing in the absence of a party or a party's representative if the party has—
- (a) informed the committee that he does not intend to attend or be represented at the hearing (and has not subsequently advised the committee otherwise);
  - (b) failed to inform the committee whether he intends to attend or be represented at the hearing; or
  - (c) left the hearing in circumstances enabling the committee reasonably to conclude that he does not intend to participate further.
- (2) If a party has indicated that he does intend to attend or be represented at the hearing, but fails to so attend or be so represented, the relevant committee may—
- (a) adjourn the hearing to a specified date if it considers it to be in the public interest, or
  - (b) proceed with the hearing in the party's absence.
- (3) Where the hearing proceeds in the absence of a party, the relevant committee must consider at the hearing the application or representations made by that party.
- (4) Where, under this Regulation, the relevant committee adjourns the hearing to a specified date it must, as soon as reasonably practicable, notify the parties of the date, time and place to which the hearing has been adjourned.

### Hearings to be public

8. (1) Subject to paragraph (2), the hearing must take place in public.
- (2) A relevant committee may direct that all or part of a hearing must be in private if it is satisfied that it is necessary in all the circumstances of the case, having regard to—
- (a) any unfairness to a party that is likely to result from a hearing in public; and
  - (b) the need to protect as far as possible, the commercial or other legitimate interests of a party.

### Proceedings of a relevant committee in conducting a hearing

9. (1) Subject to regulations 8 and 11, a relevant committee must permit a party to attend a hearing and be assisted or represented by any person whether or not that person is legally qualified.
- (2) At the beginning of the hearing the relevant committee must explain the procedure that it proposes to follow in conducting the hearing.
- (3) In conducting a hearing the relevant committee must ensure that each party is given the opportunity to—
- (a) address the relevant committee on any matter that is relevant to the application or review, or any representations made on the application or review;
  - (b) call witnesses to give evidence on any matter that is relevant to the application or review, or any representations made on the application or review;
  - (c) provide further information on, or explanation of, any matter on which the relevant committee has indicated that it will want further clarification under regulation 6(1)(j).
- (4) In conducting a hearing the relevant committee must also—
- (a) permit any party to question any other party or person representing a party on any matter that is relevant to the application or review, or any representations made on the application or review, where the relevant committee considers that in all the circumstances it is appropriate to do so; and
  - (b) take into consideration documentary or other information in support of the application or representations produced by a party—
    - (i) before the hearing; or
    - (ii) at the hearing, with the consent of all the other parties attending the hearing.
- (5) Without prejudice to paragraphs (3) and (4), a hearing must be conducted so that it takes the form of a discussion led by the relevant committee, and the committee must not permit any cross-examination unless it considers that cross-examination is required for it properly to consider the application or representations made by any party.

## **Gambling Act 2005 – Hearing Procedure – Regulation 9**

**This procedure has been drawn up in accordance with the Gambling Act 2005 to assist those parties attending Licensing Committee hearings.**

1. The hearing before the Council is Quasi Judicial.
  2. The Chair of the Licensing Committee will introduce the Committee and ask officers to introduce themselves.
  3. The Chair will ask the applicants to formally introduce themselves.
  4. The Solicitor to the Committee will outline the procedure to be followed at the hearing.
  5. Hearing Procedure:-
    - (a) The Licensing Officer will introduce the report.
    - (b) Questions concerning the report can be asked both by Members and the applicant.
    - (c) The Licensing Officer will introduce in turn representatives for the Responsible Authority and Interested Parties who will be asked to detail their relevant representations.
    - (d) Members may ask questions of those parties
    - (e) With the leave of the Chair the applicant or his representative may cross examine the representatives of the Responsible Authorities and Interested Parties.
    - (f) The applicant/licensee (or his/her nominated representative) will then be asked to:-
      - (i) detail the application;
      - (ii) provide clarification on the application and respond to the representations made.
    - (g) The applicant/licensee (or his/her nominated representative) may then be asked questions by members and with the leave of the Chair from the other parties present.
    - (h) The applicant will then be given the opportunity to sum up the application.
    - (i) The Licensing Officer will then detail the options.
    - (j) There will then be a private session for members to take legal advice and consider the application.
  6. The decision of the Licensing Committee will be given in accordance with the requirements of the Gambling Act 2005 and regulations made there under.
- NB:
- 1) At any time in the Licensing Process Members of the Committee may request legal advice from the Solicitor to the Committee. This advice may be given in open session or in private.
  - 2) The Committee Hearing will be held in public unless and in accordance with the Regulations the Committee determine that the public should be excluded.