

Summary of responses and comments on Gambling Statement of Principles – 2025-2027

Respondent	Response	Comment
General		
A person who lives in Wiltshire	<p>Many of its provisions are permissive of increasing the sector size and this is detrimental to public health.</p> <p>Given the effects on public health, the policy should be stronger in its strictures for the possible increase in venues.</p>	Section 4.2 requires new premises licenses or variation to an existing application to submit a local area risk assessment
A person who lives in Wiltshire	<p>Just need to ensure that empty shops, don't become gambling shops.</p> <p>Gambling is a very dangerous, destructive habit. Everything is fine in moderation, but need to ensure that it is closely monitored</p>	It is not possible to restrict use of empty shops opening as gambling premises based on the current number of premises within any area of Wiltshire. All new applications for gambling premises are given full and careful consideration.
A person who lives in Wiltshire	<p>I saw nothing to protect children from gambling. Fair grounds allow children to attempt to get prizes with darts and duck lifting and of course tombola stands and raffles at schools.</p> <p>Access to gambling for prizes for children light.</p> <p>Protection for children.</p>	<p>Section 3.3 Protecting children and other vulnerable persons from being harmed or exploited by gambling. Details the controls to protect children.</p> <p>One of the three main licensing objective is "Protecting children and other vulnerable persons from being harmed or exploited by gambling"</p>
A person who lives in Wiltshire	<p>Although I agree that the draft statement contains sufficient detail/information, it maybe contains too much. It is very easy to read without too much jargon or technical wording which is very good, but it is a long document to read.</p> <p>3.3.1 and 3.4 Gambling and Public Health and Social Responsibility. I would like these sections explained in more detail and to be a bit more specific as to what action will actually be taken. It's a bit wooly at the moment. Gambling can destroy lives. My husband had a bad gambling problem in the past, as a result he lost his home, family, work, money, everything really. 20 years later he no longer lives in his home town and is no longer in touch with his family, but no longer has a gambling</p>	<p>3.3.1 Gambling and Public Health has been updated.</p> <p>The consultation statement outlines what is considered by the licensing authority when considering gambling act applications.</p>

	<p>problem. It cost our local authority at the time, a lot of money for rehabilitation residential help and during that time he was claiming benefits too, so it would be better to deal with issues earlier. Having more staff training, so they can look out for people who are obviously having problems and having posters/literature/phone numbers clearly visible so that people have easily accessible access to help, would be great. There also needs to be a lot more help available for those experiencing difficulties such as residential help. Gambling problems can also result in criminal activity to fund gambling habits whether in the local area or elsewhere so can lead to criminal convictions which then prevent the persons concerned from gaining employment (which happened to my husband), which then puts them at greater risk of poverty, homelessness, etc.</p>	
<p>A person who lives in Wiltshire</p>	<p>Premises that are provided solely to promote gambling should not be located on prominent sites and advertising needs to be restrained. Locations in predominantly residential locations should be actively discouraged</p> <p>If anything it is too lax. Licence holders should not be permitted to continually breach rules and guidelines and need to be held to account</p> <p>The quality of public spaces is important to all ages and sections of our community and can influence how places are used and enjoyed. It is common in all commercial activities that owners and occupiers seek to draw attention to their offer. The visual aspects of many gambling premises are of a low standard and this needs to be given more consideration, particularly where shopfronts are concerned. Excessive illumination (presumably controlled under the planning acts) should not be permitted.</p>	<p>New gambling locations and visual lighting are restricted by planning requirements. New license applicants must carry out a "Local Area Risk Assessment" Appendix C to assess the local impact as part of the application process. Visits are made to enforce license conditions.</p>
<p>A person who lives in Wiltshire</p>	<p>Sorry, I reached page 37 and had to stop as I have a busy work/life schedule. It's an area that I am very interested in but this document is too long to expect a member of the general public to read and comment. I tried to skip to the bullet points but needed to read everything to understand the points.</p>	<p>Comments noted, the Public Health section has been updated to reflect the adverse effects from gambling.</p>

	From what I read, there seems to be very little regard to the damage done by addiction to gambling itself. People are killing themselves daily because of the despair they feel linked to gambling debt.	
A person who lives in Wiltshire	Why advertising gambling is still going on at all times of the day & night & young & vulnerable people are exposed to this.	This consultation covers gambling policy within Wiltshire and not advertising nationally.
Town Council	Chippenham Town Council's Planning, Environment & Transport Committee considered the consultation at their meeting on the 1st of August and agreed to not object to it. Would it be possible to accept this as the consultation response from the Council rather than filling in the consultation itself?	Accepted and noted.
A person who lives in Wiltshire	Thank you for this opportunity to comment on the Statement of Gambling Principles Policy. In this case specifically the Small Society Lottery. Could I please ask for clarification whether the Small Society Lottery annual renewal is being raised from £20 to £40 or is the £40 for the first-time application? A jump of 100% seems to be a rather extraordinary increase!	We can confirm the £40 is for the first time application and then it reverts to £20 so there is no large increase.
Bingo Association	Do you have tracked changes for this document please, or could you be specific in which numbered points / paragraphs have had alterations? Also, please could you confirm we on your list of consultees per the Gambling Commission's Guidance to Local Authorities (sections 6.18 and 8.16), as we never received this consultation. Thank you, that document was very helpful.	Thank you for your email. We do not have a tracked changes document, but I have attached our working copy of the changes made. We have consulted with our applicants where we have e-mail addresses, the gambling commission, local elected members and all local working partners in accordance with the guidance. It has also been in local media and the BBC website. I have now added you to our list of consultees.

	<p>Just for information, the Gambling Commission’s Guidance to Local Authorities (section 8.16) does include Trade Associations so we (and other relevant trade associations) should have been consulted:</p> <p style="text-align: center;">People representing those in the above categories</p> <p>8.16. Interested parties can be people who are democratically elected such as councillors, MSPs, MSs and MPs, as persons representing individuals in the other categories. This would include county, parish and town councillors. Other representatives might include bodies such as trade associations and trade unions, and residents’ and tenants’ associations. A school head or governor might act in representing the interests of pupils or parents and a community group might represent vulnerable people living near to the proposed premises.</p> <p style="text-align: center;">https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities/part-8-interested-parties</p>	
Public Health Team	<p>We have made some comments (attached edited version of the paragraph you sent over below.)</p> <p>And also a few comments on the full statement (shown below)</p> <p><u>Gambling Statement of Principles</u> Please can this paragraph on page 9: An individual is responsible for their own gambling; however, this Licensing Authority wishes to stress that although it acknowledges this, it also recognises that the Applicant/Operator has a “duty of care” to patrons.</p> <p>Be amended to: An individual is responsible for their own gambling; however this Licensing Authority wishes to stress that although it acknowledges this, there are many factors that could impact on the individual’s decision to gamble, such as substance use, poor mental health and financial difficulties therefore, it also recognises that the Applicant/Operator has a “duty of care” to patrons.</p> <p>Page 11 – Amend substance misuse to substance use as misuse has negative implications towards the individual</p>	Amendments made to final Draft report v3

Rewritten 3.3.1

Gambling is now widely recognised as a public health concern due to its potential to cause significant individual and societal harms.

Problem or harmful gambling is defined by the Gambling Commission as “gambling to a degree that compromises, disrupts or damages family, personal or recreational pursuits.” There is a growing evidence base for the risk factors of harmful gambling (Public Health England Evidence Review on Gambling Related Harms, 2023). While causality is difficult to establish, harmful gambling has been found to be associated with:

- Proximity to and accessibility of gambling opportunities;
- Density of gambling opportunities;
- Advertising and marketing;
- Peer influence.

Certain individual characteristics also increase the risk of harmful gambling such as mental ill health, substance use, and some neurological conditions (e.g. ADHD).

Gambling harms are adverse effects from gambling that most commonly include negative impacts on peoples’ finances, relationships, and health. The negative impact can be temporary and short-term but Public Health England’s evidence review highlights the risk of substantive and long-term – even intergenerational – harms associated with gambling.

Gambling harms often extend beyond the person who gambles and impacts their family, their social network, the community, and society.

Gambling harms are often complex, and one type of harm can lead to or exacerbate other harms. There is evidence to suggest that gambling behaviours of adults creates financial and other harms for children and young people.

Although Public Health are not currently a Responsible Authority for the Gambling Act 2005, this Licensing Authority will consult with the Public Health Team within Wiltshire Council when considering risks associated with gambling within the local communities. There is an expectation that all gambling premises within Wiltshire do all they can to manage their social responsibility commitments in protecting patrons from harm.