

For Consideration By	Licensing Sub-Committee
Meeting Date	03 March 2026
Type of Application	Betting (other than track) premises licence
Address of Premises	Jenningsbet, 157 Stoke Newington High Street, London, N16 0NY
Classification	Decision
Ward(s) Affected	Stoke Newington
Group Director	Rickardo Hyatt

1. **Summary**

- 1.1. This is an application for a betting (other than track) premises licence.

2. **Application**

- 2.1. Betting Shop Operations Limited has made the application under the Gambling Act 2005.
- 2.2. The application is attached as Appendix A.

3. **Licensable Activity**

- 3.1. Providing facilities for betting

4. **Opening hours of the premises**

- 4.1. Default hours under the Gambling Act 2005

5. **Current Status/History**

- 5.1 The premises are not currently licensed for any activity, however, according to records held by the Licensing Service, site was previously a betting shop.

6. Representations: Responsible Authorities

From	Details
Environmental Health Authority	No representation received
Gambling Commission	No representation received
HM Revenue & Customs	No representation received
Planning Authority	No representation received
Area Child Protection Officer	No representation received
Fire Authority	Have confirmed no representation on this application
Police	Have confirmed no representation on this application
Licensing Authority (Appendix B)	Observation received

7. Representations: Interested Party

From	Details
4 Representations received from and on behalf of local residents. (Appendices C1-C4)	Representation received

8. Statutory Considerations

8.1 The Licensing Authority is required to have regard to the Act, Gambling Codes of Practice and the guidance issued by the Gambling Commission under the Gambling Act 2005.

8.2 Under the s153(1) of the Gambling Act 2005, licensing authorities must "aim to permit" gambling so long as it is:

- in accordance with any relevant codes of practice
- in accordance with the guidance issued by the Gambling Commission
- consistent with the Council's Statement of Principles, and
- consistent with the licensing objectives

9. Local Considerations

- 9.1 Licensing Sub-Committee is required to have regard to the London Borough of Hackney's Statement of Principles ("the Statement") adopted by the Licensing Authority.
- 9.2 The Statement applies to applications where relevant representations have been made. With regard to this application, policies, **GLP1** (Assessing local risk), **GLP2** (Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.), **GLP3** (Ensuring that gambling is carried out in a fair and open way), **GLP4** (The protection of children and other vulnerable persons from being harmed or exploited by gambling.), **GLP5** (Location of gambling premises and gaming machines), **GLP6** (Hours of operation), **GLP7** (Premises licences) and **GLP10** (Betting premises).

10. Officer Observations

- 10.1 If the Sub-Committee is minded to approve the application, the following conditions should be applied the licence:

Conditions attached to every premises licence

1. The premises shall not be used to provide facilities for gambling on Christmas Day.
(Section 183 of The Gambling Act 2005)
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 -
 - the sale of tickets in a private lottery or customer lottery, or
 - the sale of tickets in any other lottery in respect of which the sale of tickets on
 - the premises is otherwise prohibited.
5. Pool bets may not be accepted in reliance on the licence in respect of dog racing other than in accordance with arrangements made with the occupier of the dog track on which the racing takes place.
(Section 180 of the Gambling Act 2005)

Mandatory conditions attaching to every premises licences

6. 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.

7. (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.
8. Subject to anything permitted by virtue of the 2005 Act, or done in accordance with conditions 4, 5, 6 and 7 below, the premises shall not be used for any purpose other than for providing facilities for betting
9. 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.
10. 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.
11. No publications, other than racing periodicals or specialist betting publications, may be sold or offered for sale on the premises.
12. No music, dancing or other entertainment shall be provided or permitted on the premises, save for entertainment provided in accordance with condition 5.
13. (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.
14. 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)

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

11. Reasons for Officer Observations

11.1 Conditions (1) to (15) above are derived from the relevant sections of the Act.

12. Legal Comments

12.1 The Council has a duty as a Licensing Authority under the Gambling Act 2005 to carry out its functions with a view to promoting the following 3 licensing objectives;

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- ensuring that gambling is carried out in a fair and open way and
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

12.2 It should be noted that each of the licensing objectives have equal importance and are the only grounds upon which a relevant representation can be made.

13. Human Rights Act 1998 Implications

13.1 There are implications to;

- **Article 6** – Right to a fair hearing
- **Article 14** – Not to discriminate
- Balancing: **Article 1-** Peaceful enjoyment of their possession (i.e. a licence is defined as being a possession) with
- **Article 8** – Right of Privacy (i.e. respect private & family life) to achieve a proportionate decision having regard to the protection of an individuals rights against the interests of the community at large.

14. Members Decision Making

- A. **Option 1**
That the application be refused
- B. **Option 2**
That the application be approved, together with any conditions or restrictions which Members consider necessary for the promotion of the licensing objectives.

15. Conclusion

15.1 That Members decide on the application under the Gambling Act 2005.

Appendices:

Appendix A: Application for a betting premises licence and supporting

documents

Appendix B: Representation from responsible authority

Appendix C: Representations from interested parties

Appendix D: Location map

Background documents

Gambling Act 2005

Relevant Codes of Practice

Guidance issued by the Gambling Commission for Local Authorities

LBH Gambling Statement of Principles

Report Author	Name: Suba Sriramana Title: Licensing Officer Email: Suba.Sriramana@hackney.gov.uk Tel: 020 8356 4915
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**Application for a premises licence
under the Gambling Act 2005 (standard form)**

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

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

Where the application is -

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

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

Part 1 - Type of premises licence applied for

Regional Casino Large Casino Small Casino

Bingo Adult Gaming Centre Family Entertainment Centre

Betting (Track) Betting (Other)

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

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

Part 2 – Applicant Details

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

Section A

Individual Applicant

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

2 Surname: [*****] Other name(s): [*****]

3 Applicant's address (home/business -):

[*****]

[*****]

[*****]

[*****]

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.

Section B

Application on Behalf of an organisation

6 Name of applicant business or organisation: Betting Shop Operations Limited

7. The applicant's registered or principal address:

4 Simon Champion Court, 232-234 High Street, Epping, Essex

Postcode: CM16 4AU

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

003224-N-332321-004

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.

Part 3 – Premises Details

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

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

157 High Street, Stoke Newington, London

Postcode: N16 0NY

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 application relates to the former Ladbrokes betting office at 157 High Street which was vacated in April. To one side of the premises is an independent book shop and to the other is an independent all purpose hardware shop.

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

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

[*****]

Part 4 – Times of Operation

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

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			[*****]
Tues			[*****]
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): ASAP

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

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

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

Yes

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

226 Stamford Hill, London, N16 6TT

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

The applicant has held an Operating Licence since the Gambling Act 2005 came into force and has in place a whole range of policies and procedures which include (1) Jenningsbet Operating Strategy for the branch which will reference the following associated documents; (2) AML/CTF Risk Assessment (3) AML/CTF Policy (4) AML/CTF Procedures and Controls (Shops) (5) AML/CTF Procedures and Controls (Head Office) (6) Social Responsibility Gambling Policy (7) Customer Interaction Policy. If any responsible authority would like to see or discuss these policies then please contact

Part 6 – Declarations and Checklist (Please tick)

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.

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

Part 7 – Signatures

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

Woods Whur

Signature:

Print Name: Woods Whur

Date: 30 December 2025 Capacity: Solicitors for the Applicant

22 For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised

agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: [*****]

Date: (dd/mm/yyyy)

Capacity: [*****]

Part 8 – Contact Details

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

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

24 Postal address for correspondence associated with this application:

Woods Whur

[REDACTED]

[REDACTED]

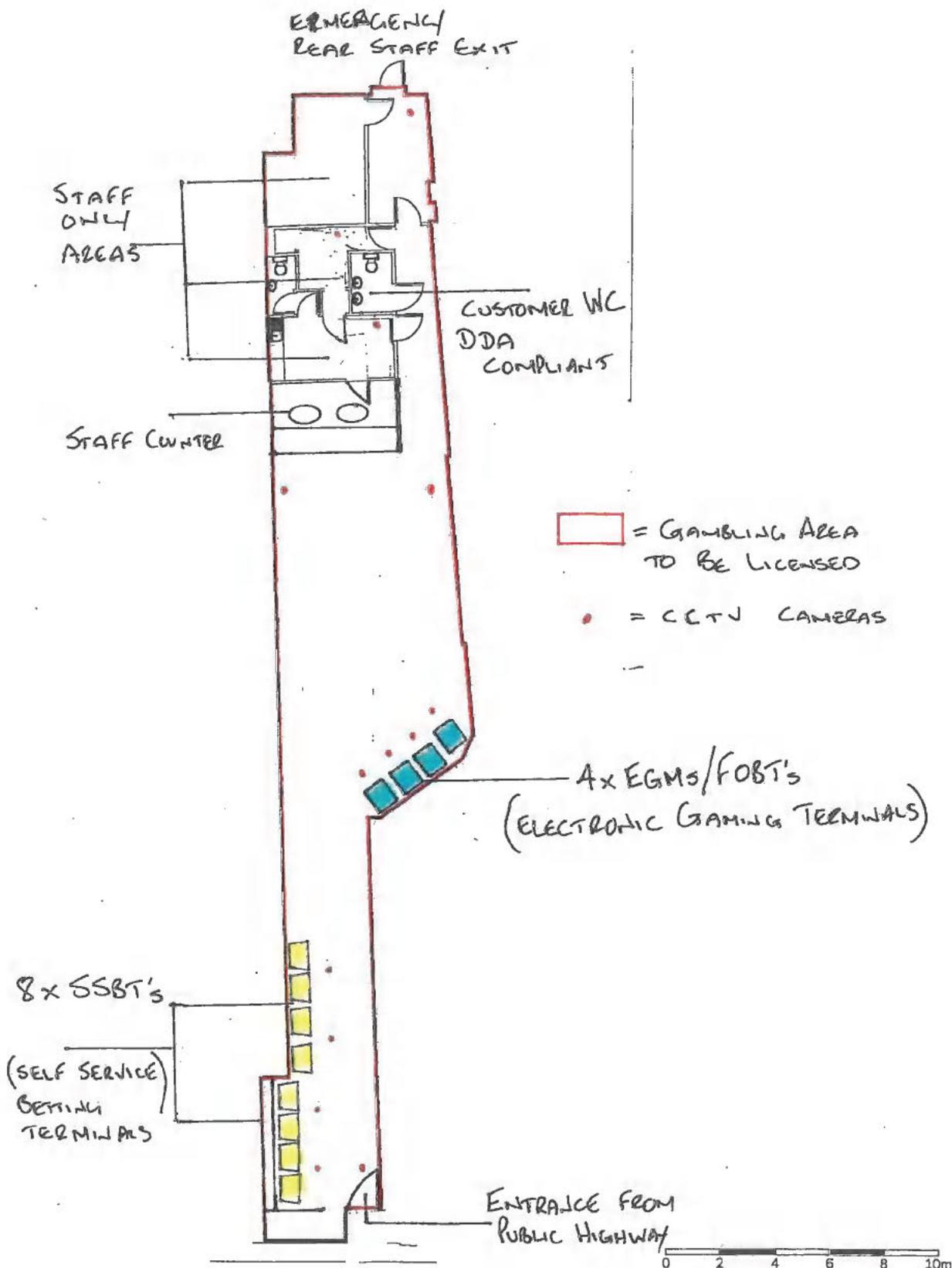
[REDACTED]

Postcode: [REDACTED]

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]

PREMISES LICENSE PLAN



BETTING SHOP OPERATIONS LIMITED
 (TRADING AS JENNINGSBET)

157 High Street
 Stoke Newington
 London
 N16 0NY

Scale 1:200 @A4
 Drawing no.: 61593-1
 Date drawn: 25-09-25
 Revision: 00



Trueplan (UK) Ltd
 Bank Chambers, 36 Mount Pleasant Road
 Tunbridge Wells, TN1 1RB
 01892 614 881
 plans@trueplan.co.uk www.trueplan.co.uk



Operating strategy, shop management and site-specific measures. December 2025

157 Stoke Newington High Street N16 0NY

Company background:

Jennings is one of the oldest independent bookmakers in the UK having been operating since the introduction of the Betting Gaming and Lotteries Act 1963 and is based in Epping, Essex. During this period the company has continuously held a Betting Office Permit (under the Betting Gaming and Lotteries Act 1963) and since September 2007 a UK Gambling Commission Operating Licence. Jenningsbet currently hold 183 individual Betting Office Licences throughout England, the closest to this site being at 226 Stamford Hill, London, N16 6TT, a mile to the North.

Jenningsbet prides itself on being a well-run modern professional organisation with an unblemished regulatory record. It has been visited by the Gambling Commission for corporate visits following the initial grant of the Operating Licence. During these visits all aspects of the business including promotion of the Licensing Objectives and Operating Policies were examined and all documentation approved by the Gambling Commission.

In addition, a further review was undertaken by the Gambling Commission (GC) into our suitability to take over an existing Operating Licence that controlled 40 betting shops. In considering our suitability all our Operational policies and procedures in connection with regulation and LCCP codes were reviewed. These were deemed suitable without any amendments requested with formal Change of Corporate Control granted in July 2024.

These policies have subsequently been updated (July 2025) considering operational and LCCP changes.

Having operated in 226 Stamford Hill, London N16 6TT since 2009 Jennings have established a loyal and considerable customer base in the wider area and if granted this unit will complement the Stamford Hill branch.

This unit (previously occupied by Ladbrokes) offers the ability for Jennings to bring a unit that has been vacant for almost two years back into use, create 5 full time & 1-part time jobs and contribute to the local economy.

Jenningsbet represents the independent betting shop sector at the Betting and Gaming Council (BGC) and is proactive on the Safer Gambling committee within the BGC and has partnered with SG Global to enhance our Safer Gambling programmes across our betting shop estate.

Operational Strategy and Shop Management:

Responsible Gambling:

Jenningsbet operate in a socially responsible manner, have created specific policies for Socially Responsible Gambling and Customer Interactions within our branches and operate in accordance with the Gambling Commissions LCCP and the 3 Licensing Objectives from the Gambling Act (2005);

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

All Jenningsbet shop leaflets and responsible gambling marketing materials reference GamCare's website (www.begambleaware.org), all shops display posters and "please gamble responsibly" leaflets providing information and contact details for GamCare. This information is positioned next to gaming machines, at the counter, each entrance/exit and in at least one other discreet area. Further reference should be made to our Social Responsibility Policy.

Customer Interaction

Social Responsibility is at the forefront of Jenningsbet culture. Senior Management are encouraged to use a customer-outcomes based approach with a focus on minimising gambling related harm (GRH). It's important to us that customers are assisted in staying in control of their gambling and we provide tools and information which helps them to stay in control and keep their gambling fun in a safe environment. We are committed to working to detect, prevent, and minimise the risk of gambling related harm to our customers. Our staff are trained to carry out impactful customer interactions that form part of our controls in preventing harm. Our controls for GRH prevention are framed by the three key components:

1. Identify

Customer behaviours and physical triggers that may/will warrant a customer interaction.

2. Interact

Customer Interactions, Observations and Reviews

3. Evaluate

Reviewing a customer's profile and additional actions concerning a customer

Our training around this area includes:

All new staff complete Social Responsibility training again covering Safer Gambling, Age Verification and vulnerability. This takes place in a face-to-face training workshop in induction week.

All staff complete the Jenningsbet refresher online course on Social Responsibility, this covers Safer Gambling, Age Verification and vulnerability. This refresher training starts every October.

Duty Managers from each branch complete a module (with City & Guilds certifications) provided by the **BetKnowMore/YGAM training partnership** 'Safer Gambling Training'. Last year this module was 'enhanced skills for customer interactions'. This year is 'Understanding customer vulnerability in a gambling context'.

In person full day workshops provided by the **BetKnowMore/YGAM training partnership** 'Safer Gambling Training' with a lived experience speaker.

Our work with BetKnowMore's New Beginnings' programme also provided a real opportunity for engagement for our Duty Managers with the BKM female lived experience speakers. A day was spent hearing their stories and feedback on what may have helped them as a female experiencing gambling related harm

Further reference should be made to our Customer Interaction Policy.

2023 Course content

- Live Lived Experience session with interactive Q&A session (LE will be betting shop specific)
- A look at customer vulnerability and different vulnerable groups
- Awareness of Gambling Harms (resources, relationships, health, affected others and legacy harms)
- Barriers to interacting with customers
- A look at some of the skills that can support customer interactions

2024 Course content

- Enhanced skills for customer interactions

2025 Course content

Face to face courses with **SG Global** (Betknowmore) <https://www.safergamblingtraining.com/> to include New Advanced Safer Gambling Training Workshops.

In addition, E-Learning Programmes:

- Understanding customer vulnerability in a gambling environment
- Understanding gambling harms
- Understanding safeguarding and managing welfare
- Enhanced skills for customer interactions
- Awareness of Gambling Support Services
- Health and Wellbeing

Money Laundering and Terrorist Funding

Jenningsbet are committed to ensuring that criminals cannot launder the proceeds of crime through Jenningsbet products or services. We continue to scrutinise abnormal customer betting activities to assess risk and spot gambling-related crime. Whilst some relationships with customers will be transient or temporary in nature, consideration to this issue in relation to all customers is given.

Preventing Money Laundering (ML) and Terrorist Funding (TF) requires clear communication of the policies, procedures and controls to all employees, along with robust mechanisms to ensure that they are carried out effectively, weaknesses are identified and improvements are made wherever necessary.

We have in place an AML/CTF Procedures and Control document, an ML Risk Assessment and ML Policy for all our employees to adhere to. Our employee training forms as a primary control against the majority of the ML/TF risks. Every member of the shop team is trained on the regulatory framework Jennings operates in with emphasis on individual responsibilities and accountability. The training programme covers what money laundering is and what incidents they may detect that could constitute money laundering, our controls and to reporting/escalation procedures.

Training takes the form of face-to-face workshops upon induction and yearly online refresher courses. Updated ML Policy and ML Procedures and Controls documents are read as part of staff's required training. Should new risks be identified and felt to warrant more face-to-face training these are delivered on an ad-hoc basis. Further reference should be made to the supporting ML/TF documents.

Crime and anti-social behaviour (ASB)

Historically labelled a 'low level crime', ASB can have a deep impact on victims, genuine customers and communities. Jenningsbet provide conflict management training at induction and refresher training when required. This training along with physical systems such as 'Staff Guard' an external central operational control team and Security department with monitored two-way audio & visual support mitigate potential risk of ASB and conflict. Staff Guard are able to provide immediate response to any assistance required by employees. Jenningsbet recognises that public nuisance can escalate in certain circumstances and that it has a responsibility to work in partnership with residents and authorities to reduce environmental impact. Jenningsbet operates a reporting system that flags up any branches identified as having anti-social behaviour issues to the security department and compliance team. This is escalated to Head of Compliance and if any customer is deemed to be creating ASB they are provided with banning notices. Further reference should be made to the supporting ML/TF documents.

Monitoring And Reporting System (MARS)

MARS is a new reporting/case management tool created by the independent Betting Technology Consortium which remains under ongoing review and development. Jenningsbet have adopted this tool for particular use cases and are involved in the ongoing development of the system.

Jenningsbet have an Electronic Point of Sale (EPOS) system in each shop which allows employees to take and record Over the Counter (OTC) bets, manage transactions and reconciliations. Part of the EPOS system allows staff to create monitored customer records and “tag” OTC bets to those records to facilitate the ongoing tracking of customer activity when certain criteria are met.

The MARS tool supplements the EPOS system as a reporting tool – pulling monitored customer data from the EPOS system, and improving the way that data is presented to those reviewing monitored customer activity from an AML/Safer Gambling perspective.

MARS presents customer monitored OTC figures (i.e. their recorded stakes, returns and wins/losses) in an efficient manner over different time periods (i.e. Daily, Weekly, Quarterly and Yearly). This data is used by Jenningsbet daily to determine if customers require further review or intervention based on policy threshold criterion.

Where action is required based on the review of the above monitored customer figures, MARS allows the creation of a more comprehensive customer profile, to which the customer figures can be “tagged”. This also includes the ability to manually link customer shop records across shops where a customer is known to be monitored in multiple outlets, or across multiple records – effectively allowing a holistic/consolidated view of overall OTC activity.

The customer record on MARS can then be used as a case management tool to reflect actions taken in respect of that customer at that point and beyond as part of ongoing monitoring from an AML/SG perspective. This includes the ability to capture notes summarising analyses undertaken. Jenningsbet use these customer records as part of monitored customer reviews.

Once created, a monitored customer record on MARS also includes further insights, including visuals summarising daily shop betting visits, customer data, betting patterns, and activity graphs, showing the progression of customer spend over time to assist decision making. Further features due to be tested at Jenningsbet include the ability to “tag” those customers for future review based on spend or time alerts.

Whilst the current focus is on embedding and utilising the tool for head office analyses of monitored OTC customers

further developments currently being explored include of how customer monitoring can be extended to other products (including betting and gaming terminals).

Site Specific Control Measures:

- The alarm system is to be installed by **Link Integrated**; they are a leading specialist in electronic integrated security. This will include the installation of their **StaffGuard** system which provides a 24/7/365 security system, ensuring rapid response times and continuous staff safety.
- Full CCTV will be installed to cover all areas including all entry and exit points to and from the premises enabling frontal **identification size image** of every person exiting the premises under any light conditions, Gaming machines and the counter area. The CCTV will record activities 24 hours a day whilst persons are on the premises and retain the footage for at least 28 days. Live footage can also be viewed by the Operational control team and Security department. The footage captured is available upon request (within hours) and provided by our Security teams. Signage will be displayed in the customer area and upon the entrance door advising that CCTV is in operation.
- **StaffGuard** also provide a live link to an operator and can call for Police assistance if deemed necessary. If the StaffGuard facility is triggered due to criminal activity the video and audio is recorded to be used as evidence. Adherence to procedures is monitored via both the security department and compliance team.
- A concealed safe will be installed with appropriate time delays and be located behind the main service area out of public view.
- Staff Guard lanyards in shop which the shop team wear upon themselves with full visibility to the customers. These lanyards provide employees the opportunity to activate and contact the operational control team by a press of a button.
- Full height reinforced security screen to the counter
- EGMs located in full view of the staff counter
- The entrance doors with electronic bolt lock enabling the shop team to control access remotely from behind the counter (this is stronger than Mag Locks).
- The entrances will have a 'bleep' announcement upon entry and exit, enabling the shop team to be aware of any persons entering/leaving the premises
- Customer toilet, controlled and monitored by the shop team via buzzer entry system operated from behind the counter
- Think/Challenge 25 will be in operation with a 'refusals' register kept upon the premises and made available for inspection as required.
- Prominent signage promoting our Think/Challenge 25 policy will be displayed.
- Independent third party testing on our Think/Challenge 25 procedures will take place at least twice a year with results available to the Licensing Authority upon request.
- Having risk assessed the location, staffing levels will reflect the operational needs alongside the security and responsible gambling obligations.

Operating Hours:

Despite the mandatory hours allowed by the Gambling act being 07:00 – 22:00 we do not envisage opening before 08:30 (09:00 on a Sunday)

To support this application the following documents have been made available:

- Social Responsibility Gambling Policy – July 2025
- Customer Interaction Guide – November 2025
- Customer Self Exclusion Policy – October 2025
- Customer Complaints Policy October 2025
- Everything OK Questionnaire – February 2025
- Employee Questionnaire Briefer – February 2025
- Training Extracts – July 2025
- ML – TF Risk Assessment – March 2025
- ML – TF Policy March 2025
- ML – TF Procedure and Controls (in branch) July 2025
- Reporting Suspicious Activity Policy – March 2025

Case Summary

HACKNEY COUNCIL LICENSING SUB-COMMITTEE

3RD MARCH 2026 - 2PM - GOOGLE MEET

APPLICATION FOR NEW BETTING OFFICE PREMISES LICENCE

JENNINGSBET, 157 HIGH STREET, STOKE NEWINGTON, N16 0NY

CASE SUMMARY ON BEHALF OF APPLIANT

Introduction

1. This is an application for a new Betting premises licence (“BPL”) for premises at 157 High Street, Stoke Newington, London, N16 0NY. The application is made by JenningsBet.
2. These premises have previously held a BPL, and operated as a Betting Office for many years. Ladbrokes operated a Betting Office at this site since June 2008, although Ladbrokes ceased to operate the premises in 2024.
3. This is not a site that has not held a licence before. It is a site that has held a BPL and traded as Betting Office for many years.
4. The BPL will be subject to all conditions imposed under the Gambling Act 2005;
 - Gambling Commissions Licence Conditions and Codes of Practice
 - Mandatory and default conditions attaching to Betting Premises Licences
5. Jenningsbet are one of the oldest independent firms of Betting Office operators in England. It remains owned by the same family and the family have been involved in Betting Shops, particularly in London and the surrounding counties since the 1960s. Jenningsbet has a very

experienced management team, and currently operates over 180 Betting Premises in England, and are always extremely aware of local issues.

6. In submitting the application, a Local Area Risk Assessment was prepared by Jenningsbet. The Local Area Risk Assessment assess potential risks in the area, and then sets out the operating measures that Jenningsbet have in place to deal with those risks. All operating measures are set out in the Local Area Risk Assessment, and an additional document “Jenningsbet Operating Strategy, Stoke Newington” is submitted with this Case Summary as a separate document.
7. Jenningsbet have held an operating licence since the Gambling Act 2005 came into force on 1st September 2007, and has in place a whole range of policies and procedures, which are approved by the Gambling Commission. When the application was submitted, it confirmed the following “*The Applicant has held an operating licence since the Gambling Act 2005 came into force, and has in place a whole range of policies and procedures which include (1) Jenningsbet Operating Strategy for the branch, (2) AML/CTF Risk Assessment, (3) AML/CTF Policy, (4) AML/CTF Procedures and Controls, (5) AML/CTF Policies and Controls (head office), (6) Social Responsibility Gambling Policy, (7) Customer Interaction Policy.*” It went on to say, “*If any Responsible Authority would like to see or discuss these policies, then please contact the Applicant*”.
8. Jenningsbet have not received any representations to this application from the Gambling Commission, Public Health or the Metropolitan Police. An observation has been submitted by David Tuitt on behalf of Hackney Council, which does not make any representations against the application, confirms that the site previously operated as Ladbrokes, and also confirms that the Local Authority Risk Assessment assesses potential risks and provides details on staff training and in store security arrangements. It makes no objection to the application submitted. No request has been made to assess any of these documents, which are of course all fully approved by the Gambling Commission.
9. There are 4 representations made against the application by local residents.
 - Objection 1 objects on the basis of the number of gambling/betting locations in the area and notes that the High Street has been struggling.
 - Objection 2 objects on the basis of the number of betting shops in the area.
 - Objection 3 objects also notes the number of betting shops in the area, and suggests the council should be encouraging companies to move in with more positive benefits and refers to gambling being an addiction.

- Objection 4 notes that the high street has declined and that the area has issues of poverty, substance abuse and anti-social behaviour.
10. None of the representations refer to any evidence that this particular site has been a cause of crime or disorder and has not protected the vulnerable, and none of the evidence argues that the Jenningsbet application does not promote the Licensing Objectives which is the test under The Gambling Act 2005 - see later.
 11. A brief summary of the law is set out in this case summary, but as the licensing committee will be aware, a dislike of gambling, a general notion that it is undesirable to allow gambling premises in an area, moral or ethical objections to gambling and the demand for gambling premises/number of gambling premises, are not grounds that are legally relevant to the determination of an application for a premises licence, and cannot be a ground for refusal.
 12. Having made that point, it must be stressed on behalf of the Applicant that Jenningsbet are a very conscientious operator of Betting Offices, with an extremely experienced senior management team. Jenningsbet take their responsibilities under the Gambling Act extremely seriously and have in place all necessary staff training and policies and procedures to ensure that the Licensing Objectives are promoted at all times.

The Law

13. As the Sub-Committee will be aware, each piece of licensing legislation sets out a different approach to the question of grant. The approach relevant to gambling is in section 153 of the Gambling Act 2005:
“In exercising their functions under this Part, a licensing authority shall aim to permit the use of premises for gambling in so far as the authority thinks it:
 - (a) in accordance with any relevant code of practice [issued by the Gambling Commission]*
 - (b) in accordance with any relevant guidance issued by the Commission*
 - (c) reasonably consistent with the licensing objectives (subject to (a) and (b))*
14. The following points should be noted:

- a. The test is mandatory: *“a licensing authority shall”*
- b. The obligation to *“aim to permit”* where (a) – (d) are satisfied is described by the Gambling Commission in its Guidance as *“the licensing authority’s primary obligation”* (para 7.56).
- c. The *“aim to permit”* is explained in the leading textbook Patersons:

“... it creates a presumption in favour of granting the premises licence since it is only if the licence is granted that the premises may lawfully be used for gambling. But the duty seems to go further than that. The verb ‘to aim’ is defined by the OED as meaning ‘To calculate one’s course with a view to arrive (at a point); to direct one’s course, to make it one’s object to attain. Hence to have it as an object, to endeavour earnestly....’ A person who ‘aims’ to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling.”
- d. As the Guidance states: *“Any refusal should be for reasons which demonstrate that the licensing objectives will not or are unlikely to be met”* (para 5.34). That means demonstrate by evidence.
- e. Conversely, the following considerations are legally irrelevant to the determination of an application for a premises licence:
 - i. A dislike of gambling (para 5.34).
 - ii. A general notion that it is undesirable to allow gambling premises in an area (para 5.34).
 - iii. Moral or ethical objections to gambling (para 5.34).
 - iv. The demand for gambling premises (see s 153 Gambling Act 2005). As such, objections which state that there are enough gambling establishments in a locality may be relevant to planning, but they are irrelevant to licensing.
 - v. Planning considerations (see section 210 Gambling Act 2005), such as the tone or character of the area.
 - vi. Nuisance (see Gambling Commission Guidance para 5.5).

Conclusion

- 15. In this case there is no objection from the Metropolitan Police who are the main source of advice on crime and disorder.

16. This is perhaps understandable as Jenningsbet are an extremely experienced operator of Betting Offices and a Betting Office operated at this site for 16 years without issue. The Local Area Risk Assessment submitted with the application provides all necessary measures required by an operator to promote the Licensing Objectives in this area.

17. The Sub-Committee is invited to take the view that based on the evidence and written representations before it;

- The Applicant's experience and competence is not questioned.
- The Applicant's policies and procedures and measures in place to promote the Licensing Objectives is not challenged.
- There is no evidence before it that Jenningsbet fail to promote the Licensing Objectives at any of its 180 trading sites.
- The Sub-Committee can be satisfied that the Applicant will promote the Licensing Objectives and that the Aim to Permit obligation set out in the Gambling Act 2005 is satisfied.

18. Accordingly, it is submitted that the Application can properly be granted in accordance with Section 153 Gambling Act 2005, and the Sub-Committee is respectfully invited to grant the application.

Andrew Woods

Woods Whur

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Re: Gambling Act 2005: Application for a betting premises licence - Jenningsbet, 157 Stoke Newington High Street, London, N16 0NY

1 message

David Tuitt <david.tuitt@hackney.gov.uk>
To: "Licensing (Shared Mailbox)" <licensing@hackney.gov.uk>

26 January 2026 at 18:51

Dear colleagues,

I write to provide observations in response to the new application for a betting (other than track) premises licence received in respect of [157 Stoke Newington High Street, London N16 0NY](#).

The Licensing Authority notes the application site previously operated as Ladbrokes. Records show that the licence was surrendered on 18/03/2024. The applicant has assessed local risk as required and attached findings to the application in the form of a local area risk assessment (LARA). This has highlighted risk factors such as, for example, the locations of the nearest schools, gambling addiction support facilities and alcohol or drug support facilities. The applicant has also used this document to provide details on staff training and in-store security arrangements. I understand that the applicant has also demonstrated that they have a 'right to occupy' the site by enclosing a copy of the lease agreement with the landlord.

Licensing records show that there are 3 other betting establishments within an 800m radius of 157 Stoke Newington High Street as follows:

Betting Shop

- Ladbrokes, [115b Stoke Newington Road, N16 8BX](#) (700m)*
- William Hill, [44 Stamford Hill, N16 6XT](#) (498m)*
- Paddy Power, [117-119 Stoke Newington High Street, N16 0PA](#) (113m)*

Records also show there are a further two gambling premises within the same radius as follows:

Adult Gaming Centre

- Admiral, [165 Stoke Newington High Street, N16 0NY](#) (125m)*

Bingo

- Palace Amusements, [181 Stoke Newington High Street, N16 0LH](#) (106m)*

It is noted that the application does not seek hours beyond the default hours set out in legislation. It is understood that other betting shops in the area also do not exceed default hours.

Let me know if there are any queries.

Kind regards,

--
David Tuitt
Business Regulation Team Leader
Licensing | Technical Support
Direct Tel: 020 8356 4942
Tel: 020 8356 2431

[Redacted]

[Redacted]

[Redacted]

[Redacted]



Representation re: Jenningsbet application, N16 0NY

1 message

5 January 2026 at 16:58

To: "Licensing (Shared Mailbox)" <licensing@hackney.gov.uk>

Hello,

We are local residents who live ~250m away from the proposed location (N16 0DD).

We would like to strongly object to this application given the number of gambling/betting locations already in very close proximity to the proposed site, with two casinos and a betting shop already within 100m. Jenningsbet already has another location one mile further up the road.

This section of high street has been struggling since the building frontage collapse in 2023 with a large number of shops lost while the street was dominated by the scaffolding and repair work. Some local businesses in this area are now seriously struggling to keep running due to the change in shoppers, and adding yet another gambling location makes the area even less attractive and will prolong recovery of the area.

Could you please also let me know why this application does not appear on <https://hackney.gov.uk/licensing-applications> ?

████████████████████
████████████████████ Dynevor Road, N16 ██████████



Application from Jenningsbet for betting shop on Stoke Newington High Street

1 message

5 January 2026 at 17:28

To: "licensing@hackney.gov.uk" <licensing@hackney.gov.uk>

Dear Sir/Madam

I am a local resident and would like to register my opposition to Jenningsbet applying to open a betting shop next to Stoke Newington book shop. We already have far too many betting shops along this stretch of road and opening another one can't be any good for local people (particularly those who are addicted to gambling). Surely, there must be more deserving businesses for this location.

Regards





Jenningsbet licence N16

1 message

6 January 2026 at 12:32

To: licensing@hackney.gov.uk

Hello

I can't find this licence application on the Hackney website but I would like to oppose the premises licence for gambling for Jenningsbet 157 High St, Stoke Newington N16 0NY.

I live in Dynevor Rd behind the High St and feel that a betting shop would be detrimental for the following reasons:

- There are already 4 betting shops between just north of Abney Cemetery to Shacklewell Lane - 2 x Paddy Power and 2 x Ladbrokes plus an Admiral Casino gaming shop near Church St lights.

That is 5 gaming/gambling shops - there is no need for another one.

- The council should be trying to encourage companies to move in with more positive benefits to the local society.

Gambling is an addiction for some people - there are already 5 nearby premises for them to provide a location and the people of N16 should not have yet another outlet for losing (most likely) their money.

- Although gambling is done by all ages I would rather the young people of N16 did not have the temptation added, by way of another betting shop - which would be in close proximity to local pubs (Wetherspools, Coach and Horses) .

Please take this as an opposition to the licence request.

Thanks

[Redacted]
[Redacted] Dynevor Road N16 [Redacted]



Jenningsbet Against

1 message

[REDACTED]
To: licensing@hackney.gov.uk

5 January 2026 at 17:36

Hi there,

I'm a resident at [REDACTED] Dynevor Road, N16 [REDACTED] and I heard about plans to potentially grant a license to Jenningsbet.

As a council, you should be ashamed. Poverty, substance abuse, antisocial behaviour and general decay of this area are on the rise. Your constituents are poorer than they've ever been, more vulnerable than they've ever been and there is an enormous social divide.

What message does it send to endorse yet another betting shop being opened? There are so many on SN high street, we don't need to encourage more people to be taken advantage of by giving a green light to more of this. You should be opening a rehabilitation centre, getting people off the streets, helping them find work and fulfilment. Not allowing the poorest and most mentally unwell people in hackney to spend more money that they already don't have, to worsen their lives, put even further strain on our resources and line the pockets of the rich.

They say you can tell whether a high street has declined based on how many betting shops are on there. Absolute disgrace that SN high street is already in a state, and you're going to open up yet another one.

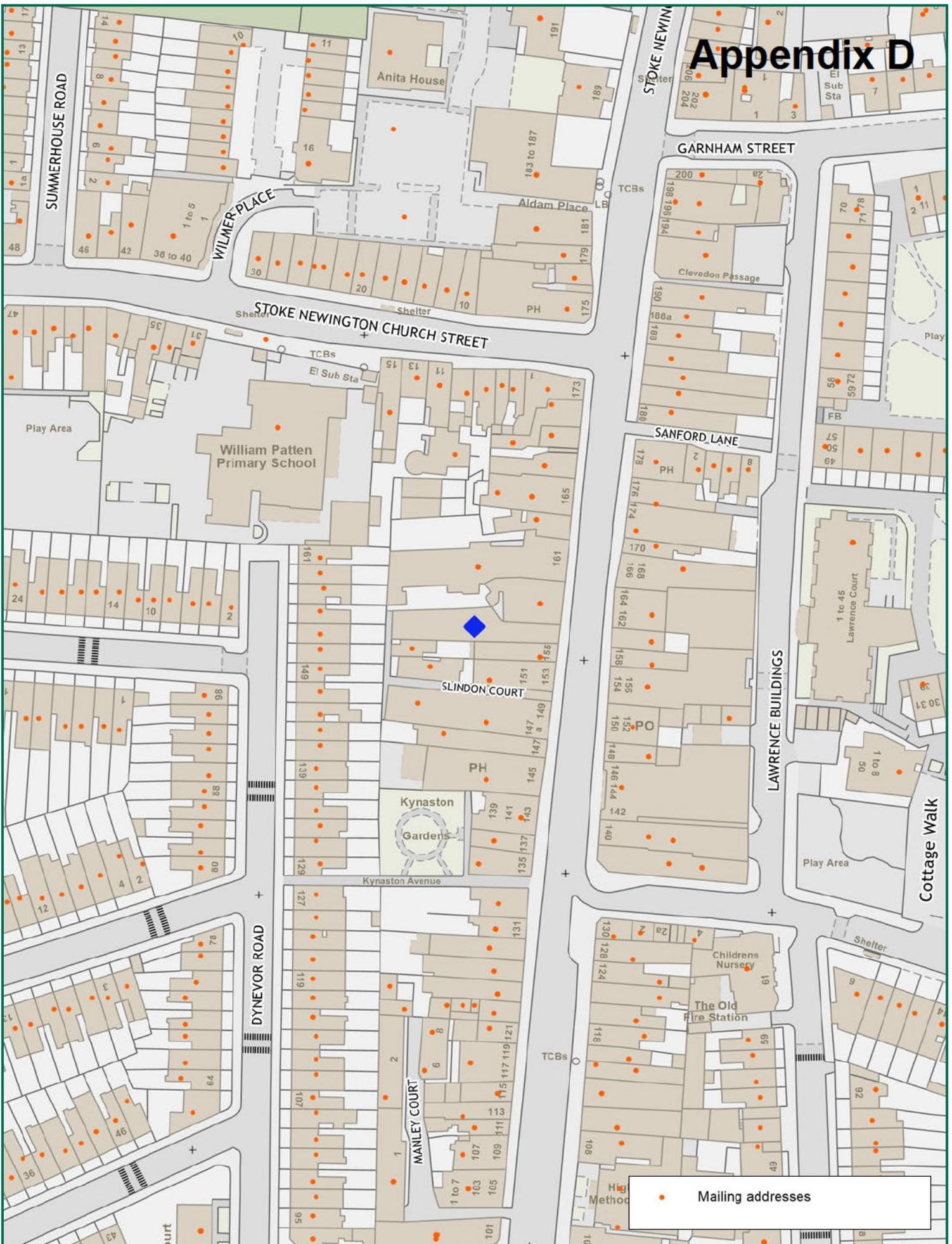
A fairer hackney for all means taking a stand against this trend and fighting back.

Please think about this properly, not just about the short-term tax revenue you'll make from the shop. We need to do better than this.

Thank you

[REDACTED]

Appendix D



Scale: 1:1250 at A4

Jenningsbet, 157 Stoke Newington High Street, N16 0NY



Ref:
Wednesday, February 18,
2026

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