

Gambling Act 2005

Representation from Environmental Health

Application Details

Premises: 71 Torbay Road, Paignton, TQ4 6AJ

Name of Applicant: Hollywood Slots UK Limited

Address: 77 – 79 Torbay Road, Paignton, TQ4 6AJ

Type of Application: Adult Gaming Centre

Representation

This department would like to make the following representation:

I consider the application to undermine the following licensing objectives:

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

The likely effect of granting the licence as applied will undermine the licensing objectives because:

From the plan provided with the application, it appears there are approximately 107 gaming machines on the ground floor, 8 gaming machines within the smoking area and 31 gaming machines on the mezzanine floor. This totals 146 gaming machines, but does not include any tablets which may include gaming machine content made available for use on the premises. If granted, this would be the largest Adult Gaming Centre (AGC) in Torbay.

Torbay Road, Paignton already has a high concentration of gambling premises. An additional Adult Gaming Centre is likely to have a net negative effect on the town and there are already many opportunities in the area for people to gamble if they choose to do so, including seven existing Adult Gaming Centres on the same road.

There are currently 12 gambling premises on Torbay Road, Paignton including the seven AGCs, two family entertainment centres, one alcohol premises with a gaming machine permit (more than 2 machines) and one premises with an alcohol premises notification (2 or less gaming machines). There is also a betting shop nearby on Victoria Street and two-family entertainment centres on Paignton Pier.

The proposed application would increase the current clustering of similar venues which is detrimental to the character, vitality and economic wellbeing of the town.

According to a [‘Torbay Today’](#) article published on 31 December 2025, BBC research based on Gambling Commission data found that Torbay has more adult gaming centres than any other area in Devon, all of them situated in areas of serious deprivation. Only five other Councils across the country have more slot and gaming machine outlets per head of population. The article states ‘GambleAware says those living in deprived areas are twice as likely to experience gambling harm’ and that ‘Torbay’s 14 AGCs serve a population of 140, 000, placing it equal sixth in a table of councils across the country’. The CEO of Gamble Aware stated ‘Our research has shown those in the most deprived areas are two times more likely to experience gambling harms, so we are concerned by the clustering of gambling venues in the most deprived areas of the country. While it is important to remember that all forms of gambling carry risks, our research has also shown the high level of harms associated with gaming machines

such as slot machines in gambling venues, with one in two people using gaming machines in the past year experiencing “problem gambling”.

The map in Figure 1 below shows the close proximity of the 35 gambling premises within Paignton.

Figure 1: Map of Paignton centre showing the current location of gambling premises



Paignton is a tourist destination and whilst the Gambling Act 2005 is commonly described as an ‘aim to permit’ regime, this application brings some concerns.

The addition of this very large gambling establishment is likely to increase the accessibility and normalisation of gambling and raises concerns that the licensing objective of protecting children and other vulnerable persons from being harmed or exploited by gambling may not be upheld.

There is also pawnshop (Cash Creators) on Torquay Road, Paignton which could also impact on vulnerable gamblers.

Our main concern is the potential increase in gambling related harm from adding a very large establishment to an already densely populated area of gambling premises. This could impact a wide range of people including families, employees, employers, and those within the wider community who may not have been involved in gambling themselves. Harms include financial hardship, relationship breakdown, domestic abuse, mental health problems and suicidal thoughts. It is important to note that anyone can be negatively affected by gambling. Gambling behaviours occur along a continuum, with possible harms dependent on the level of exposure. Research shows that there are features of some gambling products which make them more addictive, like continuous play.

Evidence suggests that certain groups are more vulnerable to problem gambling including children and young people, people with mental health issues, certain minority ethnic groups, the unemployed, homeless people, those with low intellectual functioning, people with financially constrained circumstances and those living in deprived areas ([Tackling gambling related harm a whole council approach](#)).

Recommendations

I therefore recommend that this application is refused for the following reasons:

- As outlined above, there is already a high concentration of similar premises in the immediate and wider vicinity. The proposed application would further increase the current clustering of similar venues which is detrimental to the character, vitality and economic wellbeing of the town.
- An Adult Gaming Centre is likely to have a net negative effect on the town and would not bring any additional benefit as there are already many opportunities in the area for people to gamble if they choose to do so, including the existing seven Adult Gaming Centres on the same road.
- The likely negative health impact on children and young people, vulnerable people and the cumulative impact when co-located in a high-risk environment.

Public Health Objection - proposed Adult Gaming Centre (AGC) at 71 Torbay Road, Paignton, TQ4 6AJ

Thank you for the opportunity to comment on this grant application.

On behalf of **Torbay Council Public Health Team**, we have reviewed this application to grant a licence for an Adult Gaming Centre (AGC) and need to raise some fundamental concerns about the proposal. Public Health's overarching aim is to work to protect and improve the public's health and reduce health inequalities.

Objections

The grounds for this objection are based around the premise of the gambling objective **'protecting children and other vulnerable persons from being harmed or exploited by gambling'**. People likely to be the most negatively affected by this potential new Adult Gaming Centre include:

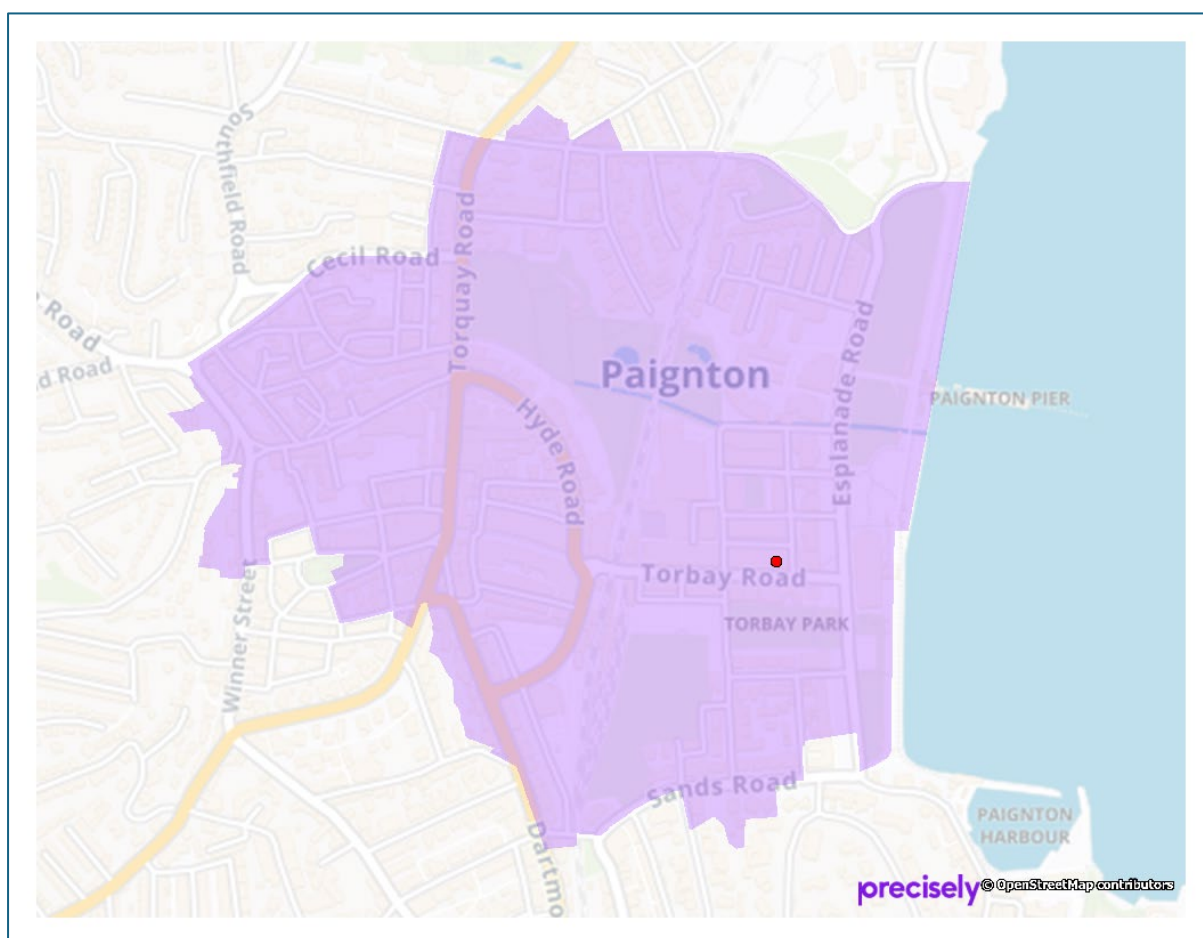
- Children, young adults and vulnerable people
- People in treatment for gambling related harms
- People in treatment for alcohol addiction
- People living in areas of high deprivation
- People living with financial hardship.

If granted a license, this premises would likely lead to increased gambling activity with a high risk of harm to people who live, work, and socialise in the area of central Paignton and specifically, Roundham with Hyde ward.

Local area relevance and impact

The shaded area below shows areas of central Paignton that are deemed to be among the **10% most deprived in England** according to the English indices of Deprivation 2025, with an associated reduction in support networks, and higher numbers of people seeking help from local services for debt, housing, and other financial problems. The red dot indicates the proposed location of the new premises. The presence of an additional Adult Gaming Centre in this area is likely to impact disproportionately on the health of those most at risk.

Figure 1: Areas of central Paignton deemed to be among the 10% most deprived in England (English Indices of Deprivation, 2025)



The grounds for the Public Health objection ‘protecting children and other vulnerable persons from being harmed or exploited by gambling’ are supported by:

1. **Central Paignton Local Area Profile (Figure 1):**

The area (LSOA) within which the proposed premises would be located is among the **10% most deprived in England** in relation to:

- Crime
- Education, Skills & Training (particularly in relation to Children & Young People)

- Health Deprivation and Disability

This area is also within the **20% most deprived in England** in relation to:

- Employment
- Living Environment (particularly in relation to Housing)

55% of children under 16 in the area (LSOA) in which the proposed location would be located, live in income deprived families according to the English Indices of Deprivation.

2. **Specific Ward Profile – Roundham with Hyde.**

The proposed location sits within the electoral ward of Roundham with Hyde in central Paignton. When looking at Roundham with Hyde compared to the 15 electoral wards of Torbay, Roundham with Hyde has the **highest** level of:

- Areas classified as being within the 20% most deprived in England.
- Population under the age of 65 who have a disability
- Proportion of 16- to 64-year-olds claiming Personal independence Payments
- Percentage of pupils who are overweight or obese
- Percentage of residents aged 18 to 65 claiming Universal Credit
- Unplanned hospital admissions (Age-standardised)
- Admissions for alcohol-specific conditions (Age-standardised)
- Emergency hospital admissions for coronary heart disease (Age-standardised)
- Hospital admissions due to strokes (Age-standardised)

Out of the 16 electoral wards within Torbay, Roundham with Hyde has the **lowest** level of:

- Life expectancy at birth
- Children achieving a good level of development at Early Years Foundation Stage
- 25 to 64 years olds in receipt of a degree level qualification

Roundham with Hyde also has notably higher levels of pupils with recognised special education needs than the Torbay average, also higher unemployment levels (5.3% for 2022 to 2026, England 4.0%, Torbay 3.6%) and emergency admissions to hospital for self-harm.

Roundham with Hyde also has significantly higher reported crime levels than Torbay as a whole.

3. **Concentration of gambling premises in Torbay and central Paignton.**

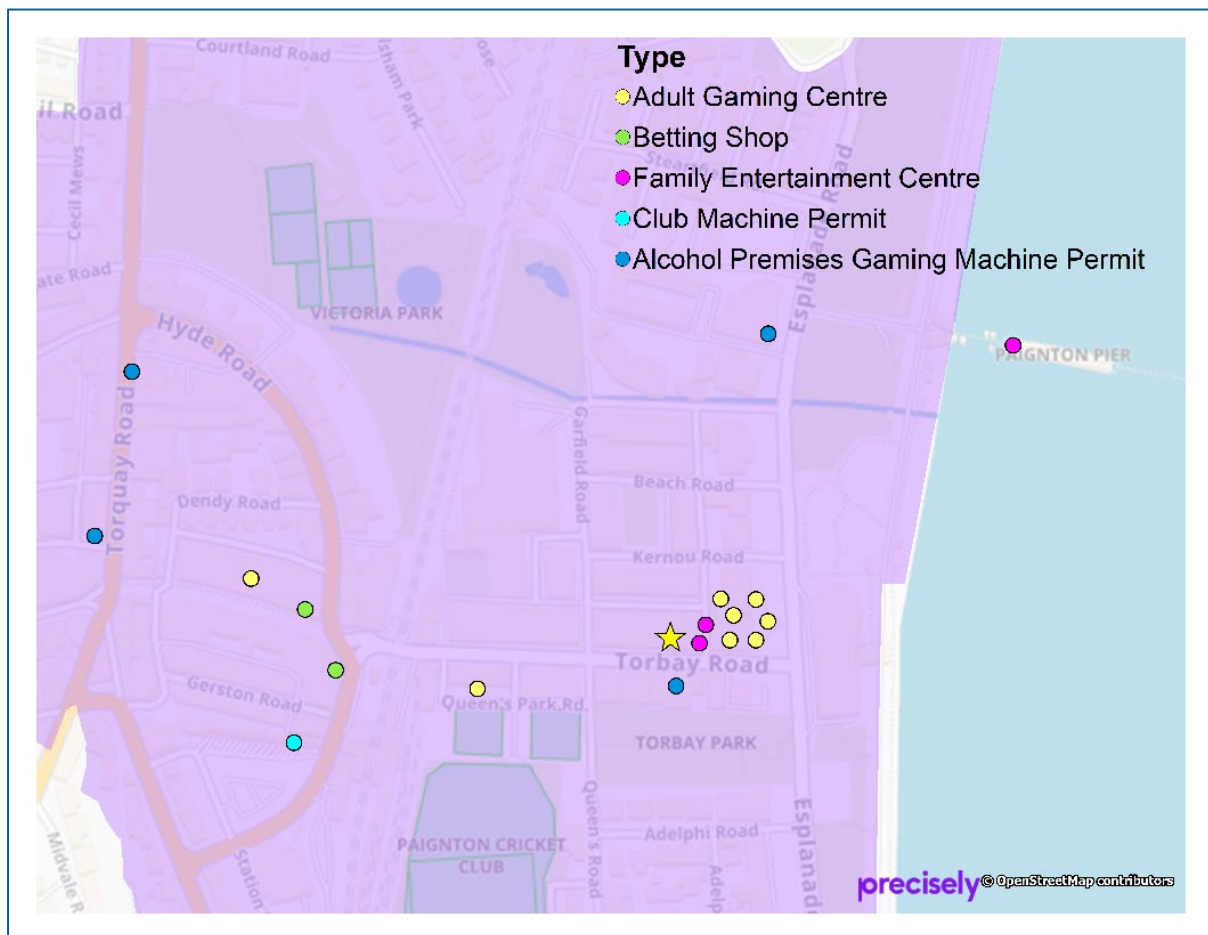
Torbay has **44 premises** licensed for gambling - approximately 27.2 gambling premises per 100,000 population. This figure is significantly higher than the England average of 12.9, Torbay and is **one of the highest proliferations of gambling premises in England** (63) (54).

Below is a map of central Paignton around the proposed premises location which is shown with the yellow star. It shows all the gambling premises within a 500-metre radius of the proposed location. All of these premises are within areas deemed to be among the 10% most deprived in England.

The map shows **eight (8) Adult Gaming Centres on Torbay Road, six (6) of which are in the immediate vicinity of the proposed premises.**

This does not include additional gaming opportunities within the surrounding pubs, hotels, and social clubs and similar premises with a licence for a maximum of two gaming machines, as well as newsagent-type off licenses who retail opportunities to buy and gamble on lottery tickets and scratchcards.

Figure 2: Map of gambling premises in central Paignton within a 500m radius, including the proposed premises



An additional Adult Gaming Centre is likely to have a net negative effect on the town centre and would not bring any benefit as there are already many opportunities in the area for people to gamble.

The proposed application would create clustering of similar venues which would be detrimental to the character, vitality and economic wellbeing of the town.

Torbay Gambling Harm Profile

Table 1: Local costs of harm associated with gambling

Cost of harm associated with gambling	Torbay	Great Britain
Health: General Medical Service Consultation (mental health)	£37,451	£22,870,771
Health: Hospital Inpatient	£774,497	£472,980,254
Crime: Crime Committed (police call out)	£55,482	£33,882,624
Crime: Court Appearance	£15,604	£9,529,488
Housing: Homelessness Support	£28,608	£17,470,728
Welfare: Universal Credit	£1,387,576	£847,383,250
Fiscal cost (£ millions)	£2,299,218	£1,480,000,000

Headline statistics

- Torbay is currently ranked as the most deprived upper-tier local authority in the Southwest, with approximately 27% of the population classified as living in areas that are amongst the most deprived in England (62).
- Torbay has **44 premises** licensed for gambling - approximately 27.2 gambling premises per 100,000 population. This figure is significantly higher than the England average of 12.9, Torbay and is **one of the highest proliferations of gambling premises in England** (63) (54).
- In Torbay, **52.94%** of adults are estimated to have spent money on gambling in the past 4 weeks (statistically significant when compared to the England value), falling to 28.68% when the National Lottery is excluded, though **participation in gambling activity is higher in Torbay, both with and without the National Lottery, than both the Southwest and England values** (see Figure 10) (25).

- There are a number of validated tools used to measure gambling-related harms including the **Problem Gambling Severity Index (PGSI)**. The PGSI measures how harmful an individual's gambling behaviour is, the frequency of gambling and behaviours such as chasing losses and experiencing a loss of control. It covers nine items with a rating scale of answers. A PGSI score of:
 - **1 to 2:** indicates 'low risk gambling' by which a person is unlikely to have experienced adverse consequences.
 - **3 to 7:** indicates 'moderate risk gambling' by which a person may or may not have experienced any adverse consequences from gambling.
 - **8 and over:** indicates 'disordered gambling' by which a person will have experienced adverse consequences from gambling and may have lost control of their behaviour.
- Using the OHID estimates, **85.82%** of Torbay's adult population have a **PGSI** score of 0, meaning the majority of the population experiences no gambling risk. However, **3.24%** are estimated to **score 8+**, meaning that they are likely to experience adverse consequences. This equates to approximately **3700** at any given time. It is also important to remember that for each of these individuals it is estimated there are **6-10 affected others** also experiencing severe gambling-related harms. The PGSI scores for Torbay are largely similar to the England average, but **Torbay has higher estimated numbers of those scoring 8+** than England and the Southwest at 3.78% and 2.66% respectively.

In summary, in Torbay there is a **high density of gambling premises and higher than average participation in gambling than the Southwest region and England**. Torbay is generally in line with PGSI scores in England but has a **higher proportion of people scoring 8+**. People in Torbay access support for gambling disorder and related harms less than the GB average.

Gambling related harms – generic information

Some groups of people are at more risk of gambling-related harm than general population. Key at-risk groups or behaviours include, but are not limited to 1:

- Men
- Those aged 16-44
- Young people.
- Unemployed and those under constrained economic circumstances.
- Those residing in areas of deprivation.

- Those experiencing homelessness.
- Those experiencing mental ill health.
- Those experiencing substance abuse/misuse.

Adult Gaming Centres (AGCs), such as the one subject to this objection, are associated with a **cluster of gambling-related harms** that affect individuals, families, and the wider community. These harms are well-documented in national evidence reviews and surveys, and coastal towns, such as Paignton, show **distinct vulnerability patterns**.

- **Financial harm:** Losses, debt, rent arrears, and reduced ability to meet basic needs. Coastal areas show concentrated harm “hotspots,” with AGCs contributing to localised financial stress. ²
- **Crime and safety harm:** Theft, fraud, and acquisitive crime linked to financial desperation. Coastal towns with dense gambling venues show elevated harm clusters. ³
- **Community-level harm:** Concentration of Adult Gaming Centres can create “harm hotspots,” reduce high-street resilience, and increase visible deprivation. Coastal areas are specifically identified as higher-risk environments. ⁴
- **Mental-health harm:** Anxiety, depression, suicidality, and stress linked to continuous-play machines and frequent visits. National evidence reviews identify mental-health deterioration as a core harm category. ⁵
- **Inequality-driven harm:** Adult Gaming Centres often cluster in more deprived coastal neighbourhoods, amplifying existing socioeconomic vulnerabilities. National evidence reviews highlight deprivation as a major risk factor. ⁶
- **Work and productivity harm:** Reduced concentration, absenteeism, and job instability due to time spent gambling or stress from losses. Identified in national harms frameworks. ⁷
- **Physical-health harm:** Sleep disruption, stress-related symptoms, and neglect of health needs. These are recognised in the Gambling Harms Severity Index framework. ⁸
- **Relationship harm:** Conflict, breakdown, loss of trust, and domestic strain. The Gambling Survey for Great Britain highlights relationship discord as a common adverse consequence. ⁹
- **Youth exposure harm:** Although Adult Gaming Centres are 18+, clustering on high streets increases visibility and normalisation of gambling for young people in tourist towns. Youth exposure to gambling **refers to the ways children and young people see, learn about, or become familiar with gambling long before they legally participate**, which increases the likelihood of future harm. It’s one of the most important early-risk factors identified in UK evidence reviews. ¹⁰ This can happen through:
 - **Visibility of gambling venues:** High-street Adult Gaming Centres, betting shops, and arcades in places young people regularly pass.
 - **Advertising and marketing:** TV, social media, sports sponsorship, influencer content, and online adverts.

- **Family and peer behaviour:** Seeing parents, siblings, or friends gamble, talk about wins, or treat gambling as normal.
- **Digital exposure:** Loot boxes, social-casino games, and gambling-like mechanics in video games.
- **Tourist-area clustering:** In coastal towns like Paignton, gambling venues are often concentrated in areas young people walk through daily.

There is evidence to show that gambling can be a significant cause of harm to public health – especially in areas of high deprivation. Examples:

- **Public Health England’s Gambling Related Harm Evidence Review (2021)** found that people at risk of gambling harms are concentrated in areas of higher deprivation and that the accessibility of gambling opportunities is associated with increased gambling activity and related harm. ¹¹

This review highlights the link between gambling and mental health issues, including the conclusion that people with gambling problems are at least twice as likely to die from suicide compared to the general population. The review also included the most comprehensive estimate of the economic burden of gambling on society to date by looking at the following categories of harm: 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)**.

- **The Marmot Review ‘Ten Years On’** identified a higher concentration of gambling premises on high streets as a sign of an “unhealthy high street” - widening inequalities for the most vulnerable and leading to poor mental and physical health. ¹²

Conclusion

If a premises licence was granted, this betting shop would lead to likely increased gambling activity with a high risk of harm to vulnerable people who live, work, and socialise in this mixed-use area. Therefore, we recommend that the application is refused based on the following grounds:

1. High numbers of vulnerable and children/young people in the area and the likely negative health impact on residents and visitors

2. There is already a high concentration of similar premises in the immediate and wider vicinity. The proposed application would create clustering of similar venues which is detrimental to the character, vitality and economic wellbeing of the area.

3. The likely negative health impact on vulnerable and children/young people and the cumulative impact when co-located in a high-risk environment.

References

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