Krupesh Hirani AM Chair of the London Assembly Health Committee C/o <u>Tim.Gallagher@london.gov.uk</u> Our ref: MGLA150324-8881

Date: 9 April 2025

Dear Krupesh,

I would like to thank the Health Committee for its investigation into gambling-related harms. I am sorry for the delay in responding.

As you know, the Greater London Authority (GLA) does not hold the responsibility for commissioning or providing services for people experiencing gambling-related harm. However, I share the Committee's concerns about the negative impacts that gambling can have on the lives of Londoners, as well as their friends and families. Harmful gambling is a health inequalities issue that disproportionately affects individuals from minoritised ethnic backgrounds, those who are unemployed and people living in more deprived areas. There is also a higher prevalence of gambling-related harms among people with poor health, low life satisfaction and wellbeing.

I welcome our new Government's commitment to reforming gambling regulations and strengthening protections to reduce gambling-related harm. It has already taken action, such as introducing a cap on online slot betting and outlining plans for the new mandatory gambling levy to be spent on treatment and prevention. The Government has made clear its ambition to develop a truly national approach, and its leadership will have the biggest impact on supporting those at risk of gambling harm. I stand ready for London to play its part as we see more details of the Government's plans, and we will share all that we have learnt from our research in London.

In the response below, I have set out how we and partners will approach your specific recommendations.

Yours sincerely,

Sir Sadiq Khan Mayor of London

Annex

Mayor of London's response to the recommendations of the London Assembly Health Committee's report on Gambling-Related harms in London

Recommendation 1 The next iteration of the Mayor's Health Inequalities Strategy Implementation Plan should give greater prominence to the issue of gambling harm, given the disproportionate impact that gambling harms have on certain demographic groups.

Gambling can harm health – with particular implications for mental health – and it is one of many areas reflected in the current Health Inequalities Strategy. The Mayor welcomes the recognition from the new Government that gambling harms must urgently be addressed, including the risks of harm it presents to young people.

To have the greatest impact on gambling harms in London, we must work closely with the Government. The GLA will await further details of how the Government will deliver its national approach to prevention and treatment and how the funding raised from the new mandatory levy will be used to ensure the GLA is aligned in its approach and making the best use of resources and delegated powers.

As the Mayor's Implementation Plan is due for publication in the spring, it is not possible to reflect the work he may be asked to undertake at a London level in support of the Government's plans. In the meantime, the Mayor will continue to look at how he can support action on gambling harms through his health in all policies approach, particularly in relation to mental health.

Recommendation 2

The Government should reconsider the 'aim to permit' duty, which would give councils greater powers to refuse applications for new betting shops, where there are already high numbers in a particular area.

Whilst the Mayor has no licensing powers, he would support a reconsideration of the 'aim to permit' duty in the Gambling legislation. As highlighted, this could give councils greater powers to refuse licensing applications for new betting shops, especially where there are already high numbers in a particular area.

This would be consistent with the approach in his London Plan, which contains policy (E9 part C7) that Local Planning Authorities should manage clusters of retail and associated uses having regard to their positive and negative impacts on town centre vitality, viability and diversity; sustainability and accessibility; place-making or local identity; community safety or security; and the mental and physical health and wellbeing of Londoners. Paragraph 6.9.5 of the London Plan specifically recognises that over-concentrations of betting shops can give rise to particular concerns and impacts on the mental and physical health and wellbeing of Londoners and the amenity, vitality, and diversity of town centres and high streets. Furthermore, the proliferation and concentration of these uses should be managed carefully through development plans and planning decisions. Betting shops fall within the *sui generis* (in a class of their own) Use Class, which means that new developments and changes of use for betting shops are subject to a full planning application to the Local Planning Authority.

Recommendation 3

The Mayor should work with local authorities to share best practice and information about how they can prevent the proliferation of betting shops in London, including by implementing guidance set out in the London Plan. This work should also explore how councils can utilise the anticipated cumulative impact assessments (CIAs) for gambling premises applications, which the Government has committed to introducing.

CIAs help licensing authorities to manage the number and type of licensed premises within an area where there is evidence to show that the number or density of licensed premises may be contributing to crime and disorder and public nuisance. The Mayor has no licensing powers but would welcome boroughs coming together to share best practice. However, this work should be led by boroughs where the power and expertise sit. As noted earlier in this response, should the Government bring forward further interventions around CIA, the Mayor would look at how he could provide any support needed at a London-wide level.

In relation to planning, the Mayor's London Plan Policy E9 has full statutory weight under the planning legislation, and part C7 provides clear strategic policy criteria to help Local Planning Authorities manage the impacts of concentrations of uses such as betting shops on town centre vitality, viability and diversity; sustainability and accessibility; place-making and local identity; community safety; security; and the mental and physical health and wellbeing of Londoners.

Recommendation 4

London should seek to learn from Bristol City Council's policy of banning gambling advertisements. The Mayor's Health Adviser and the GLA Group Director of Public Health should meet with senior councillors and officers at Bristol City Council in order to gain a greater understanding of the rationale and evidence base that was used to implement restrictions on gambling advertising in Bristol. The GLA should also analyse the evaluations that are taking place on the impact of Bristol's advertising restrictions, in order to inform its own approach in this area.

The GLA Group Public Health Unit (PHU) initiated contact with officers at Bristol City Council in 2023, and they look forward to seeing any associated evaluations of its advertising policy when they are available. The Mayor and PHU will be interested in seeing how evidence from Bristol's approach influences the Government's plans and whether any learning would apply to other cities, including London.

Recommendation 5

The Mayor should bring forward proposals in 2024-25 to ban gambling advertisements on the TfL network. He should consult with key stakeholders, including charity and health partners and representatives of the gambling industry, before implementing such a ban.

Transport for London (TfL) has worked closely with the PHU to develop its understanding of this subject further. This has included commissioning the University of Sheffield and University of Glasgow to produce an independent evidence review (published in January 2023) of existing research.

The Mayor's 2021 manifesto commitment to explore this intervention predates the previous Government's gambling White Paper, published in 2023, and came at a time when work to address gambling harms was being led at a local and regional level. With the change in Government there is a renewed commitment to look at the best way to address gambling harms nationally. As part of this, the Mayor is pleased to see that one of the specific objectives of the research strand looks at

filling gaps in the evidence base, specifically further understanding of the impact of advertising. The Mayor hopes that the new Government's leadership will provide a national framework to address this issue, including providing a national definition of harmful gambling advertising. The Mayor will await the conclusion of this work before looking further at the implications for Londoners. When the GLA hears more details about the Government's plans in this area, including additional evidence and evaluation, the Mayor will consider how he can best support at a regional level. More information on how the Government will approach the statutory levy can be found here.

Recommendation 6

The Mayor should work with NHS England (London) to advocate for training on gambling harms to be adopted across all GP practices in London.

<u>Demand for gambling addiction help has more than doubled since 2023</u>, and GPs are seeing more issues relating to problem gambling.

Therefore, the Mayor is pleased that the new mandatory levy will see 50% of the \pounds 100 million raised directed to the NHS to support treatment for gambling-related harms. The Government's ambition is to develop a comprehensive treatment system, including recovery and aftercare. Additionally, funding will go towards training for frontline workers.

GPs are a key point of contact for many seeking help, and often it may be a family member affected by the gambling who presents to their practice. However, primary care is under significant pressure, so the Mayor would welcome any additional resources that could support GPs. The Mayor will wait to see further details of how the Government's plans develop and how action to tackle gambling harms is referenced in the new NHS 10 Year Plan, before looking at how he can best support regionally.

Recommendation 7

The Mayor should use his convening role to help ensure that, while the new commissioning arrangements under the statutory levy are being rolled out, there is effective collaboration and integration between NHS services and the third sector in London in delivering support and treatment for gambling harms, and there is no disruption to existing service provision.

As noted in the responses above, the Mayor is pleased to see the <u>recent plans laid out by the new</u> <u>Government</u> on how it will implement the new mandatory levy and how revenue raised will be used.

As further details of the Government's plans are brought forward, the PHU and the Health and Wellbeing Team will continue to work alongside the NHS, Thrive LDN and voluntary and community sector partners to look at how the GLA can support regional and local arrangements as the new levy is rolled out.

Recommendation 8

The Mayor should work with the NHS in London to pilot public health awareness messaging relating to gambling harms. This should include providing advertising space on the TfL network.

The Mayor welcomes the new Government's commitment to taking a public health approach to addressing the harms associated with gambling, including a focus on prevention. Its plans to use funds raised by the new mandatory levy include public health campaigns.

A portion will also support a bespoke research programme to inform future policy and regulation and will specifically include looking to fill gaps in the evidence base relating to the impacts of advertising. The Mayor hopes that it will also look at the impact of public health messaging, as the independent evidence review by the University of Sheffield and University of Glasgow highlighted a lack of evidence that "safer gambling" messages can reduce risk. Until we get further information about a national approach to gambling advertising, the Mayor will continue to ensure advertising on TfL's estate features the Gamble Aware website/logo, which signposts those at risk of gambling harm to support.

City Hall has a very limited allocation of space on the TfL network and is not currently able to offer advertising space for free within this allocation. More widely, TfL's commercial arrangements prevent the provision of free advertising space in London to third parties.