

Licensing Office
Newcastle under Lyme Borough Council
Civic Offices
Merrial Street
Newcastle
ST5 2AG

23rd October 2015

Dear Sir,

Consultation on Newcastle under Lyme Borough Council's Statement of Principles – Gambling Act 2005

Coral Racing Limited is most grateful to be given the opportunity to respond to this consultation exercise. Coral was one of the first national bookmakers to be licensed under the Betting and Gaming Act of 1960, and so has been operating the length and breadth of the UK for over 50 years. Its premises comprise locations in the inner city, on the high street, in suburbs and in rural areas, and in areas of both high and low deprivation. It now operates 1850 betting offices across Great Britain, which comprise about 20% of all licensed betting offices. It is, therefore, a highly experienced operator.

Coral Racing Limited are broadly supportive of the document. It again notes that the Board when considering applications are still required to 'aim to permit gambling' where this is 'reasonably consistent with the licensing objectives'. We politely note that the majority of other councils include a paragraph stating that moral objections to gambling are not a consideration when judging applications.

Whilst each application will be judged on its merits as mentioned at several points within your statement, we would like to highlight that Coral knows of no evidence that the location of a licensed betting office within the proximity of schools or residential areas (contained within your draft statement on Page 13 – Section 16.8), causes harm to the licensing objectives.

Coral knows of no evidence that children coming from schools are gaining access to betting offices. Coral's general experience, in common with other bookmakers, is that children are not interested in betting, and in any case the Think 21 policy operated by Coral is adequate to ensure that under-age gambling does not occur in their premises. There are very many examples of betting offices sited immediately next to schools and colleges and no evidence whatsoever that they cause problems. Additionally, we have multiple shops placed alongside other high street businesses within communities in residential areas across the country, again with no indication that such premises are causing harm to the licensing objectives.

Coral Racing Limited recognise the requirement to supply risk assessments with future applications & variations following the consultation completion (requirement is from 6th April 2016) and are pleased to see this information included within your Statement.

Coral's experience is that through all it does, it achieves an exemplary degree of compliance already, and attracts negligible evidence of regulatory harm. Through the additional local risk assessment to be introduced, Coral believe that these should be a) to assess specific risks to the licensing objectives in the local area, and b) to assess whether control measures going beyond standard control measures are needed.



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a  company



A number of Council's have created long lists of locations which by inclusion are required to be risk assessed & often with strict templates to be completed. Coral are of the opinion that as there is no evidence that the proximity of such locations causes harm to the licensing objectives, it is best left to the operators to provide their own risk assessments. Your draft statement includes an example template which is helpful, thank you and we would like to particularly thank you for the sensible approach you have shown to this new area overall. The guidance you have issued at Section 4 within the draft statement is one of the 'cleanest' (guidance wise as well as ensuring both your and our responsibilities are covered) we have read of almost 150 such Council documents. We have spoken to several Councils on this topic and if any of them ask for ideas as to how it could be improved, we trust that you will not be offended if we point them in the direction of your statement.

If we can provide any further information, we would be pleased to do so.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'John Liddle', written in a cursive style.

John Liddle
Director of Development – Coral Retail