

Ms Sharon Davies
Principle Solicitor (Licensing)
Municipal Buildings
PO Box 4
Blackpool FY1 1NA

06 SEP 2012

5 September 2012

Dear Ms Davies,

Thank you for your recent letter regarding Blackpool Council's review of its Statement and Policy of (Gambling) Principles.

The Association of British Bookmakers (ABB) is the leading trade association for high street bookmakers and represents the operators of around 7,000 betting shops in the UK, including Gala Coral, Ladbrokes, William Hill and about 130 independent bookmakers.

Betting is an everyday leisure activity which is more popular than ever, with 8 million people visiting betting shops every year. Betting shops are modern leisure retail businesses offering customers state-of-the-art video and audio systems, comfortable furniture, alcohol-free refreshments and friendly staff. They are an important part of the retail mix on high streets generating more footfall than other similar sized outlets apart from post offices and pharmacies.

We also play our part in supporting the UK economy, despite challenging conditions for the industry, contributing nearly £1 billion in tax every year - about £400 million more than we make in profit - and support 100,000 jobs. The industry takes on a relatively high proportion of staff with few qualifications, and provides them with structured training and long term career opportunities.

Betting shops are highly regulated, licensed, responsible businesses who work pro-actively to tackle any issues in communities alongside the police, regulator and local authority.

We believe the Council's current Statement and Policy of (Gambling) Principles has been effective in promoting the licensing objectives as set out in Section 1 of the Gambling Act 2005 and we are satisfied with the proposed Statement and Policy of Principles.

If the Council considers any further changes I should be grateful if you would let me know.

Please do let me know if you would require further background information on the LBO sector and/or our responsible gambling procedures.

Yours sincerely,



Dirk Vennix
Chief Executive

E: dirkvennix@abb.uk.com

30th August 2012

Neil Jack
Chief Executive
Blackpool Council
chief.executive@blackpool.gov.uk

Dear Mr Jack,

I am writing to you as Chairman on behalf of the National Casino Industry Forum (NCiF) the body that represents over 90% of UK land based casino operators.

As we know you're aware there is a requirement, under Section 349 of the Gambling Act 2005, for your Authority to publish a Gambling Policy Statement every three years, the next Policy Statement being due to come into force on 31st January 2013, following consultation. As you also know, under the Gaming Act 1968 your Authority is one of the 53 'Permitted Areas' in Great Britain where casinos may operate.

As the representative body for the casino industry we would welcome the opportunity to contribute to your consultation process.

Casinos play an important part in the provision of entertainment and hospitality, bringing mature and responsible patrons to our town and city centres. Casinos are an attractive and positive addition to the overall offer of our evening economies, without any of the negative experiences of anti-social behaviour sometimes sadly attributable to late night venues. Last year casinos in the UK hosted almost 19 million visits, and provided an important source of local revenue, which could translate to:

- New £15 million **construction investment** in local authority areas to help to restore confidence locally
- Possibility of Section 106 Agreements to **boost local services**
- Local Authority **business rates boosted** by £250,000 pa
- Areas benefit from **£4-5 million of added value** in the local economy

It is also worth noting that as a, quite properly, highly regulated industry it is also a labour intensive business, providing disproportionately high employment opportunities with typically 100 to 200 staff on a premises. Some current casino venues provide up to 450 jobs (depending on the size of the casino). Employment is met at a local level, often to the young; also the lack of academic qualifications is not a barrier to employment.

Where based, casinos are an important and positive contribution to the night-time economy of an area. They do not contribute to, but instead help to mitigate problems by offering different types of entertainment in the late night economy not centred around social drinking. Casinos add attraction, vigour and variety to our town and city centres and encourage tourism.

We would welcome and encourage dialogue with your authority to ensure that any casino premises in your area is viewed positively as contributing to the variety of offer in the night-time economy.

Yours sincerely



Malcolm Moss
Chairman



North of England

North East & Yorkshire Chairman:
Tim Dryland

North West Chairman:
Lynne D'Arcy LLB (Hons)

Regional Secretary:
Lee Le Clercq MA

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19 August 2009

Dear Sir/Madam,

Blackpool Council Statement of Licensing Principles (Gambling)

The British Beer & Pub Association (BBPA) represents brewing companies and their pub interests, and pub owning companies, accounting for 98% of beer production and around two thirds of the 60,000 pubs in the UK. Many of our members own and run pubs in Blackpool. The Association promotes the responsible sale of alcohol and management of licensed premises. It has a range of good practice information and guidance for member companies. Further information is available on our website at www.beerandpub.com.

Overall, we welcome the approach taken by the Council in basing its draft Statement of Principles on the revised LACORS template, and are pleased to comment as follows. This response is also supported by BII, the professional body for the licensed retail sector, the Association of Licensed Multiple Retailers (ALMR), which represents the interests of smaller independent companies within licensed retailing and the Federation of Licensed Victuallers Association (FLVA) which represents self-employed licensees in England.

The protection of children and vulnerable persons

We would like to take this opportunity to emphasise that pubs have had amusement with prize machines on their premises for many years. The BBPA has been pressing for legislation prohibiting under 18s from playing all cash machines (ACMs) since before the

introduction of our Code of Practice on Minimum Age of Players, and we therefore very much welcome the restriction now contained in the new Gambling Act.

The Association first introduced its Code of Practice in 1998, and has kept it under regular review since then. As a result of the Code, which is supported by other trade bodies including the ALMR, BII, FLVA and BACTA, ACMs coming on to the market include the "No Under 18s to Play" prohibition notice in the front of the machine. The inclusion of this notice has been achieved at the instigation of the Association in co-operation with machine suppliers.

BBPA member company training schemes also reinforce the management of the machines to ensure the minimum age requirement is complied with, for example by requesting recognised ID such as a PASS accredited proof of age card, driving licence or passport where there is doubt that the player is 18 years of age or over.

Grant of additional permits

While there is no actual requirement under the Gambling Act 2005 for machines to be sited in the bar, we believe that supervision of machines is very important and this is again reinforced by our Code of Practice and staff training. Under the new regime, when operators apply for additional machine permits and they are complying with the Gambling Commission Code of Practice (which will of course replace the BBPA Code), there is no reason why these should not be granted. It would be helpful if the Statement of Principles could reflect this.

Application procedures for more than two machines

The Association would welcome the inclusion in the policy of an outline of the application procedures for permits for more than two machines. We understand that some councils are taking the view that they will grant up to four machine permits without the need for a hearing. We support such an approach in the interests of reduced administration and bureaucracy for both Councils and applicants and would encourage you to consider this possibility.

Last time around, both the BBPA and LACORS were concerned about the lack of a generic application form for permits but we are pleased that a standard form is now available.

We trust that these comments are helpful and that they will be taken into account in the final version of the policy. The BBPA is committed to ensuring a smooth transition to the operation of the new gambling regime and looks forward to working with you to achieve that objective.

Yours faithfully

Lee Le Clercq