

Licensing Team
Licensing Authority
Redditch Borough Council
Town Hall
Walter Stranz Square
Redditch
Worcestershire
B98 8AH

Date: 06 March 2018
Our ref: RXB/SAU/P41186-1108
Your ref: Doc Ref: 2146322323
E-mail:
Direct line:

By Special Delivery



WORCESTERSHIRE REGULATORY
SERVICES

09 MAR 2018

Dear Sirs,

Ladbrokes Betting & Gaming Limited, 8/10 Unicorn Hill, Redditch, Worcester, B97 4QR
Application for Adult Gaming Centre Premises Licence

We act for Power Leisure Bookmakers Limited, which operates a Betting Premises Licence located at 1-2 Market Place, Redditch.

Our client has a number of concerns regarding the new application for an Adult Gaming Centre Premises Licence submitted by Ladbrokes Betting & Gaming Limited and I enclose a copy of our client's representation for the Authority's consideration.

We would be grateful if you would acknowledge receipt of our client's representation and forward any correspondence to Poppleston Allen Solicitors on the details below.

Yours faithfully

Poppleston Allen

Enc

Application for Adult Gaming Centre: section 159 of the Gambling Act 2005
Applicant: Ladbroke's Betting & Gaming Limited
Premises: 8/10 Unicorn Hill, Redditch, Worcestershire, B97 4QR

Representation submitted on behalf of Power Leisure Bookmakers Limited

09 MAR 2018

WORCESTERSHIRE REGULATORY SERVICES

Protecting vulnerable persons from being harmed or exploited by gambling

Granting the application will undermine the third licensing objective. It will be detrimental to the protection of problem gamblers and the vulnerable within Redditch from being harmed or exploited by Gambling if the grant of an AGC application was to be approved.

- An Adult Gaming Centre would substantially increase the number of high-stake and prize gaming machines available to be played by customers. The number of such machines in the betting premises previously trading from this site (Coral) was limited to 4. The plan accompanying the application includes approximately 40 gaming machines within the premises.
- Stakes and prizes: when the premises operated under a betting premises licence the maximum number of gaming machines offering winnings of up to £500 was limited to 4. If granted, that number would double: the licence would allow the applicant to operate 8 high-stake B3 gaming machines permitting players to win £500.

Crime and disorder

Granting the application has the potential to increase levels of crime and disorder in the vicinity of the arcade.

- The Adult Gaming Centre application does not specify the proposed hours of operation unlike restrictions placed on the previous site
- Permitting the premises to operate without limit on hours would substantially increase the time that the high stakes gaming machines are available to be played by members of the public. The planning application submitted to Redditch Borough Council in respect of the premises to which this application relates seeks to provide operational hours of 24 hours per day. Betting Premises Licences may open from 07:00 until 22:00. An Adult Gaming Centre without conditions on the hours would be making provision for gambling for *an additional 49 hours per week* over and above the maximum hours previously traded by Corals.
- Beyond 22:00 this would be one of few premises in the locality open to the public.

Conclusions

Ladbrokes Coral Group PLC has closed their Coral betting shop, which was previously located at the address to which this Adult Gaming Centre application relates, but retained another Ladbrokes shop in Redditch. If allowed to turn the Coral betting shop into an Adult Gaming Centre, Ladbrokes would have circumnavigated the gaming machine restrictions proposed by the Government by opening an Adult Gaming Centre providing twice as many £500 jackpot gaming machines than were permitted in the closed betting shop, and providing gambling facilities for a longer daily duration than previously permitted. This increase in machine-gambling provision flies in the face of the Government's proposals.

The DCMS Consultation on Proposals for Changes to Gaming Machines and Social Responsibility Measures, published 31st October 2017 gives the Government's view that the current regulation of B2 gaming machines, (those permitted in betting shops) *is inappropriate to achieve the stated objective of ensuring the right balance between (1) a sector that can grow and contribute to the economy, and (2) one that is socially responsible and doing all it should do to protect customers and communities.* Suggested changes to the maximum stake on B2 gaming machines range from between £20 and £2. The new maximum stake would represent a substantial reduction from the current £100 for B2 gaming machines. The express purpose of the reduction in stakes is to minimise the potential for larger session-losses by problem gamblers, and the harmful impacts on vulnerable people in wider communities. Power Leisure Bookmakers Limited (trading as Paddy Power) is one of the few operators of betting offices that have publically supported the stance taken by the Government. The application by Ladbrokes is in direct conflict with what the Government is trying to achieve.