

CORAL

Licensing Team
 Public Protection
 Gloucester City Council
 Herbert Warehouse
 The Docks
 Gloucester
 GL1 2EQ

24th August 2015

Dear Sir,

Consultation on Gloucester City 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 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', additionally noting that it should not take into account of moral objections to gambling.

Coral Racing Limited furthermore recognise the requirement to supply risk assessments with future applications or variations as from April 2016 as detailed within the consultation document.

It is particularly pleasing to note that the Council have not included within their document a list of locations which are suggested by their inclusion as not being suitable for a licensed betting office, albeit each application would be judged on its merits. The presence of such a list would have been based on assumption not fact and it is refreshing to note that Gloucester City Council have not tried to categorise specific locations.

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 with future premises licence applications from April 2016, 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. In other words, there should be no requirement to list specific locations however notwithstanding this, such locations would automatically be included with the operators risk assessment submitted when the application is considered.

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

Yours sincerely,



John Liddle
 Director of Development – Coral Retail



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