

CORAL

Mr O Rawlings
Licensing
East Herts Council
Wallfields
Pegs Lane
Hertford
SG13 SEQ

5th October 2015

Dear Mr Rawlings,

Consultation on East Herts 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 any moral objections to gambling.

Coral Racing Limited recognise the requirement to supply risk assessments with future applications and variations (requirement is from 5th April 2016) following the consultation completion and are pleased to see the requirements detailed within your statement.

Coral's experience is that, through all it does, it achieves an exemplary degree of compliance, 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 our opinion, your policy statement is correct in not listing multiple locations whose proximity to a betting office must be risk assessed, leaving it to the operator to judge which venues are included.

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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