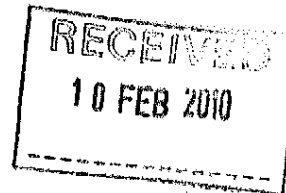




Greenside House, 50 Station Road, Wood Green, London N22 7TP
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The Right Honourable David Lammy MP
House of Commons
London SW1A 0AA

8 February 2009



Dear Mr Lammy

Betting Shop Licensing

This letter is, we hope, the precursor to a constructive dialogue on the issue of betting shop licensing in your constituency and more widely in the London Borough of Haringey.

As you know William Hill is the largest betting operator in the UK with around 2300 shops, but it is also a listed company which takes its corporate social responsibilities very seriously.

We note the views articulated on your website and the fact that you are calling for people to sign an E- petition calling for changes in the law; one assumes to make it easier for local people to object to the licensing of gambling premises.

Betting Shop Numbers

There is a generally held view that since the inception of the Gambling Act 2005 that there has been a proliferation of betting shop premises on the high street. The facts do not support this perception with the number of betting shops at a national level remaining constant at around 8500.

When Haringey Council assumed responsibility for licensing betting shops in 2007, there were 71 betting premises in the Borough and this figure has now reduced to 69 premises. Plainly, as with the national picture, some operators close shops and others open or re-site them, but the facts clearly demonstrate that the numbers of betting shops are not increasing.

In Haringey, 11 betting shops have closed and 9 have opened (some of these re-sites of existing shops). It is right that the Licensing Authority in Haringey have engaged in a number of unsuccessful challenges to the opening of new shops (because objections did not fall clearly within the three Licensing Objectives), but overall the legislation, which allows for some degree of market competition between operators has been broadly successful in regulating betting shop numbers both in your constituency and more widely.

Betting Shops and Sustainable Communities

You are clear that this is not a “moralist crusade”, but you do touch on the issue of sustainable communities and the fact that your constituents want a vibrant and diverse range of establishments on the high street; we share your view.

Far from undermining sustainable communities there is clear evidence that betting shops add to the vibrancy of an area and increase footfall for other retailers.

During the planning process, many authorities have taken the over-simplistic view that a new betting shop would have a detrimental effect on a community when in fact independent evidence has shown that the presence of a betting shop has economic benefit for other retailers and the wider community.

Betting shops also provide flexible local employment and career development for local people and the idea that the availability of betting shops drains the incomes of poor families, is scotched by data from the ONS Food and Expenditure Survey which shows that in London, only 0.4% of income is spent on gambling (per cent of total spend) of any kind.

Protecting Children and the Vulnerable

Betting shops are over 18 only establishments and it is generally at the insistence of the police and licensing officers that shop frontages are being opened up public view. William Hill and other major operators have made great strides in ensuring that betting shop staff operate a “think 21” policy. Therefore we do not believe that betting premises present a major risk to children or young persons. Merely having to walk past a betting shop does not mean that a child is in close proximity to gambling.

As you will be aware, levels of problem gambling in the UK are low by international standards (0.6%) and there are processes in place such as self exclusion and customer interaction to protect the vulnerable. William Hill has just in fact received an award from the relevant charitable body (GREaT Foundation) for its significant financial contribution to the research, education and treatment of problem gambling.

Betting shops and Crime/Disorder

We were disappointed to see that you had described betting shops as a "haven" for anti social behaviour.

Betting shops operate in a highly regulated environment. One cannot drink alcohol or smoke in a betting shop and our staff enforce these regulations rigorously; neither do they tolerate anti-social behaviour directed either at themselves or other customers. For these reasons we rely on the police or community safety teams to help our staff uphold the law, but we are very disappointed that this has been represented to you in a negative way; it should be a partnership with the shared objective of keeping crime and disorder out of betting shops.

We recognise your concern about groups smoking and drinking outside betting premises (a consequence of our compliance with the law). These "groups" also put off customers from entering the shop, but we do see this as a matter for local police who are empowered to move on those who are causing a public nuisance. This problem should not be laid at the door (literally) of betting shop staff who have no standing to act. This really is the law of unintended consequences.

We are aware of the existence of illegal gambling premises (particularly illegal gaming machines) in your constituency. Licensed and regulated premises are also much more preferable to the proliferation of illegal gambling and in seeking to limit betting shop coverage one should not make the mistake of throwing the baby out with the bathwater. Reducing betting shop coverage increases the risk of illegal gambling in pubs, clubs and other establishments. Limiting licensed gambling premises will not diminish demand for gambling on a localised basis.

Finally we would very much welcome further discussion with you on this issue and if you have any further questions please do not hesitate to contact me. We know that you share our view that we should be regulated on the basis of fact; not erroneous perception.

Yours sincerely



Andrew Lyman
Head of Public Affairs
William Hill