

**Gambling Act**  
**Responses to 2012 Consultation**

<b>Name of Responder</b>	<b>Details</b>	<b>Officer Comment</b>	<b>Action</b>
Racecourse Association Ltd	<p style="text-align: center;"><b><u>Revision of Statement of Gambling Licensing Policy - Consultation</u></b></p> <p>I am writing on behalf of the Racecourse Association, the trade association for horse racecourses in Great Britain. We have reviewed the revision of statement of gambling licensing policy for Bath and North East Somerset Council, to which we would like the opportunity to respond on behalf of our members.</p> <p><b>Location (Paragraph 12.4)</b> – The proposed location of gambling premises may be taken into account when assessing the application. The Councils are asked to consider that the location of racecourses will not have altered since its foundation, and cannot be transferred to another location.</p>	<p>Agreed, but if a new application is received the Licensing Authority will follow the criteria listed.</p>	<p>No change to policy.</p>

	<p><b>Conditions (paragraph 13.2)</b> - In certain circumstances the Council may impose additional conditions on racecourses to ensure the licensing objectives are met. The Council is asked to ensure that these conditions do not exceed those premises license conditions outlined in the Premises License Mandatory and Default Conditions.</p> <p><b>Door Supervisors (paragraph 16.1)</b> - The Councils are asked to be aware that under the Licensing Act 2003 and the Private Security Industry Act 2001, racecourses are already required to provide licensed door supervisors in some roles.</p> <p><b>Betting machines (paragraph 23.6)</b> - The Councils are asked to note that racecourses do not hold Operating Licenses and consequently any betting machines on racecourses will be provided by other operators. The racecourses will contractually require these operators to fulfil any conditions with regard to</p>	<p>Section 169 of the Gambling Act allows Licensing Authorities to attach conditions. They must however be reasonable and proportionate. The Licensing Authority will continue to judge each application on its own merits.</p> <p>All noted.</p> <p>Noted.</p>	<p>No change to policy.</p> <p>No change to policy.</p> <p>No change to policy.</p>
--	--	---	---

	<p>the provision and supervision of these machines.</p> <p><b>Separate Licenses for Certain Facilities (paragraph 23.9)</b> – The RCA is supportive of the Council’s view that arrangements regarding separate premises licenses for off-course operators will be at the discretion of the racecourse and the betting operator.</p> <p><b>Condition on Rules Being Displayed (Paragraph 23.10)</b> – The Councils should be aware that it may not be practical for racecourses to print examples of the Standard Rules of betting (Tattersalls Rules) in their racecard or in a leaflet form. However, these will be displayed, in line with the Premises License Mandatory and Default Conditions.</p> <p>Should you wish to discuss the comments raised any further, please feel free to contact either myself or my colleague Holly Cook on 01344 873536 or <a href="mailto:holly.cook@racecourseassociation.co.uk">holly.cook@racecourseassociation.co.uk</a></p> <p>Kind Regards, Paul Swain</p>	<p>Noted.</p> <p>The licensing Authority have no problem with this as the policy is only making suggestions in this regard.</p>	<p>No change to policy.</p> <p>No change to policy.</p>
--	---	---	---

<p>National Casino Industry Forum</p>	<p>30<sup>th</sup> August 2012</p> <p>Dr Jo Farrar The Chief Executive Bath and North East Somerset Council <a href="mailto:enquiries@bathnes.gov.uk">enquiries@bathnes.gov.uk</a></p> <p>Dear Dr Farrar,</p> <p>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.</p> <p>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. You will also be aware that the next Policy Statement is due to come into force on 31<sup>st</sup> January 2013.</p> <p>As the representative body for the casino industry we would welcome the opportunity to contribute to your consultation process.</p> <p>As you also know, your Authority is one of the 16 in Great Britain that is able to host a 2005 Act casino.</p> <p>Casinos play an important part in the provision of entertainment and hospitality, bringing mature and responsible patrons to our town and city centres.</p>	<p>Letter sent informing them that a provisional statement for a casino premises licence has been granted.</p>	<p>No change to policy</p>
---------------------------------------	---	--	----------------------------

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

Licensing Committee	<p>not a barrier to employment.</p> <p>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.</p> <p>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.</p> <p>Yours sincerely</p> <p><b>Malcolm Moss</b></p> <p>Councillor Tim Warren moved the officer recommendations at 2.1 and 2.2, Councillor Dine Romero seconded the proposal.</p> <p>In relation to paragraph 16.2 of the draft Statement of Principles, Councillor Warren asked that ‘...working at bingo and casino premises...’ be deleted, this was agreed. Councillor Gerry Curran suggested that this be replaced with ‘...working at licensed premises...’. This was accepted by the mover and seconder.</p>		
---------------------	---	--	--

	<p><b>RESOLVED</b> (unanimously) that</p> <p>(1) The responses to the consultation exercise be noted and it be agreed that the officer recommendations be incorporated into the revised Statement of Principles; and</p> <p>(2) The draft Statement of Principles, provided in Annex B and amended in paragraph 16.2, be presented to Council for adoption.</p>		<p>Paragraph 16.2 amended as requested and revised policy put before Council for adoption.</p> <p>.</p>
--	---	--	---