

Derek Seekings
Senior Licensing Offer Community Services
Surrey Heath Borough Council
Surrey Heath House
Knoll Road
Camberley
Surrey
GU15 3HD

11<sup>th</sup> May 2016

Dear Mr Seekings,

## Consultation on Surrey Heath Borough Council's - Gambling Act 2005 Statement of Policy

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 c. 1800 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 & variations (requirement is from 6<sup>th</sup> April 2016) and note that there is no reference to this within your draft policy. Due to it being a key requirement in the future, we are of the opinion that information about this topic should be part of the policy. We have been progressing the new risk assessment requirements for over 9 months and have been discussing our proposals for applying the correct assessments with a number of councils (through consultation exercises) as well as in more detail with Westminster City Council. We are aware that in certain authority documents, they make a summary referral to it whereas in others (broadly speaking inner-city authorities), they list in detail what is required.

As we are sure you appreciate, with an estate as wide as ours, it is not sensible to have a bespoke template for each of the c.350 local authorities and we have agreed a comprehensive form for completion in conjunction with Westminster City Council which we are using for all our shops. I am pleased to report that our template and format for recording information, meets the requirements for all authorities who have provided guidance so far.

If you require any further information with regard to our risk assessment process, please do not hesitate to get in touch.

Yours faithfully,

















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