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Ask for: Cllr Clyde Loakes  
Our Ref: CL/  
Email:   
Direct line:   
Date:

Dear Sir or Madam,

**Consultation on proposals for changes to Gaming Machines and Social Responsibility Measures**

The London Borough of Waltham Forest is located in north east London and is home to over 271,000 residents and 104,000 households. Our population is growing rapidly, with nearly 17,000 additional residents expected by 2021 and the population exceeding 300,000 by 2024.

The borough has four main town centres and a number of smaller high streets. At present there are 61 bookmakers in Waltham Forest, broken down as follows:

Operator	Number of shops
Betfred	10
Coral	6
Jenningsbet	5
Ladbrokes	10
PaddyPower	9
William Hill	21

With each betting premises containing four FOBT's, there are 244 FOBTs in the borough.

The Campaign for Fairer Gambling has estimated that based on the number of Terminals in the borough, that £68,526,731 was gambled in FOBTs in Waltham Forest last year, with residents losing £17,131,683<sup>1</sup>.

Given this we welcome the action that the government is proposing, but it is regrettable that it has taken so long to launch the consultation after the call for evidence that was issued in 2016 and the repeated calls from local government for action to be taken in the years before that.

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<sup>1</sup> <http://www.stopthefobts.org/>

**Q1. Do you agree that the maximum stake of £100 on B2 machines (FOBTs) should be reduced? If yes, what alternative maximum stake for B2 machines (FOBTs) do you support?**  
We believe that the Government should limit the maximum stake for FOBTs from £100 to £2. Furthermore we would like to see a reduction from the current permitted 4 FOBT's to 2 in Betting Shops.

**Q2. Do you agree with the government's proposals to maintain the status quo on category B1?** N/A

**Q3. Do you agree with the government's proposals to maintain the status quo on category B3?** N/A

**Q4. Do you agree with the government's proposals to maintain the status quo on category B3A?** N/A

**Q5. Do you agree with the government's proposals to maintain the status quo on category B4?** N/A

**Q6. Do you agree with the government's proposals to maintain the status quo on category C?**  
N/A

**Q7. Do you agree with the government's proposals to maintain the status quo on category D?**  
N/A

**Q8. Do you agree with the government's proposals to increase the stake and prize for prize gaming, in line with industry proposals?** N/A

**Q9. Do you agree with the government's proposals to maintain the status quo on allocations for casinos, arcades and pubs?**

We believe that the current allocation remains appropriate and as such we support the retention of the existing allocation for pubs.

**Q10. Do you agree with the government's proposals to bar contactless payments as a direct form of payment to gaming machines?**

Yes. We agree that requiring people using gaming machines to insert cash helps maintain some level of control over their activity.

**Q.11 Do you support this package of measures to improve player protection measures on gaming machines?**

We have long believed that the gambling industry needs to do more to create robust player protection measures and that the industry has long failed to live up to its responsibilities, perhaps best shown by the clustering of betting shops, especially in lower income areas, that have a younger population profile and higher rates of Job Seekers Allowance claimants.

This is despite Gambling Commission research demonstrating that problem gamblers were more likely to be young and unemployed males. These groups have long been in need of greater protection from exploitation and as such we welcome these measures, though it is again regrettable that the government has not sought to implement them sooner.

**Q.12 Do you support this package of measures to improve player protection measures for the online sector?** N/A

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**Q.13 Do you support this package of measures to address concerns about gambling advertising? N/A**

**Q.14 Do you agree the Government should consider alternative options including a mandatory levy if industry does not provide adequate funding for RET?**

Whilst everyone will of course hope that industry will voluntarily provide inadequate funding for RET, we believe that this work is so vital that the government should press ahead with a mandatory levy to ensure that this work is properly funded as soon as possible.

**Q.15 Do you agree with our assessment of the current powers available to local authorities**

We do not agree that it is possible for local authorities to properly prevent and tackle clustering.

As we made clear in our response to the Call for Evidence, betting shops in Waltham Forest are not evenly spread throughout the borough, but are tightly clustered, with the same operator often having more than one shop within a cluster.

Since 2007 there has been modest net increase of 2 additional betting shops in the borough. However, this total masks a change in the location of those betting shops. There has been a 19% (loss of six) betting shops outside of town centres, but significant increases in the number of betting shops in four of our designated town centres: Leytonstone (+100%), Bakers Arms (+50%), South Chingford (+33%) and Walthamstow Town Centre (+22%) where over a third of the boroughs betting shops are located.

The clusters of betting shops coincide with flashpoints for robbery, violence with injury, anti-social behaviour and criminal damage which is obviously a matter of great concern for residents and the Council.

Responding to these incidents requires Council and Metropolitan Police resources. It also makes the high streets more dangerous places for residents, when they should be safe places for people to go about their everyday business.

Under existing legislation the Council has no powers over the existing betting shops and the way that they are now clustered on our high streets. In order to address the problems that we have identified above, we remain of the view that regulation should be put in place that would limit the number of betting shops that an individual operator can have in a specific area, as this would further assist local authorities in preventing clustering, and shaping the high streets according to their residents' priorities.

**Q16. Are there any other relevant issues, supported by evidence, that you would like to raise as part of this consultation but that has not been covered by questions 1-15?**

Yours sincerely



**Councillor Clyde Loakes**  
**Deputy Leader and Cabinet Member for Environment**