

William Hill's Submission to the Haringey Scrutiny Committee

Introduction

William Hill (a FTSE 250 Company) is the UK's largest high street bookmaker with more than 2300 betting shops.

With its head office in Wood Green (employing over 150 staff) it operates 19 licensed betting shops within Haringey with a trading history dating back to 1961. Whilst the oldest current licence dates back to 1981, there were legacy licences and the two most recent licences were re-sites from premises very close by; aimed at improving the customer facilities. William Hill has not expanded its estate in Haringey post the implementation of the Gambling Act; in fact, it now operates one less licence than it did in 2009.

William Hill's betting shops are part of the fabric and culture of the community in Haringey and a proportion of Haringey residents, normally drawn from a very localised area in the vicinity of our shops, continues to engage in what, for most, is a social pastime costing a very small proportion of their total income. The average bet is typically about £8 but, the most frequently placed bet is about £3-4.

William Hill is a local company with its corporate headquarters based in Station Road Wood Green. In total, William Hill provides some 250 local jobs in the Borough and makes a significant contribution to the local economy with staff utilising local services and supporting local businesses. William Hill offers career opportunities for many employees and is a substantial national employer offering significant part time employment which caters for the varied needs of our workforce.

The table at Appendix A provides details of our betting shops including the dates that the current licences were granted.

William Hill's Position

General industry background has been provided by the Association of British Bookmakers whose submission we endorse.

As the largest betting shop operator in the Borough, it is arguable that William Hill would benefit most from a more restrictive regime that prevented commercial rivals appearing on the high street. However the changes made under the Gambling Act were designed to facilitate a market approach in return for greater levels of regulation over the industry and overall, we believe the industry and customers are better served by the current regime.

William Hill monitors the performance of its estate closely and as well as operating many profitable shops, it also has in it a tail of less profitable shops and also shops whose commercial performance could be improved by expanding or re-siting those premises. Like many industries, operating successfully in the current climate is difficult and despite what many people might speculate, a number of shops are likely to

close if local or national restrictions are placed on the industry. Resites typically occur where low profit shops are identified as likely to be more profitable following a resite; if this is precluded then the risk of closure with consequent job losses must increase.

With 26% of the betting shop market nationally, William Hill is prevented by current competition rules from making significant high street acquisitions, so in order to maximise the commercial potential of the organisation, the company has to retain the capability to relocate premises within an area without there being unfair restrictions on the grant of the necessary consents.

Betting shops have co-existed in the A2 Use Class Order from the outset some 20 years ago and this is not, as some have suggested, a new phenomenon. Betting Shops therefore almost by definition, exist in those areas which have been designated by the Local Planning Authority as being suitable for A2 use. New betting shop operators are not in any way exploiting the planning legislation they are simply operating (as they have for the last 20 years) within a Use Class specifically designed for their use as designated by the Local Planning Authority.

As far as property rentals are concerned we generally operate in the third tier of the retail rental market and the idea that we are paying high rents to prevent other businesses entering the high street is simply wrong. In reality, betting shops are filling what would otherwise, particularly in the current property market, be a vacant shop – they provide rental income for landlords (many of which are local) and flexible employment opportunities for local people. It should also be borne in mind that the High Street of today is not the same as it was 20 years ago; it is a fast moving and dynamic environment which will be the result of consumer demand and will no doubt, in another 20 years, be very different to what we see today. The simple reality is that a commercial over supply of betting shops in a particular location, will result in one thing and one thing alone – closures.

Whilst we respect the right of local people to influence their community, we also believe that the current regime does allow for legitimate challenge on the basis of evidence; as opposed to the industry or individual operators being the target of a political or moral campaign. Problem gambling (as evidenced by the Prevalence Study) has not increased in the UK between 1999 and 2007 and we are unaware of any evidence to suggest that a small increase in the number of betting shops (in a very limited number of areas) in any influences the incidence of problem gambling.

William Hill takes its regulatory and corporate social responsibilities very seriously. We make voluntary contributions towards research, education and treatment of problem gambling at three times the recommended contribution (£750K pa) and make other charitable donations.

It would be open to Haringey to commission research into the effect of betting shops in the Borough and apply for funding from the Responsible Gambling Fund which is wholly funded by gambling industry contributions.

Whilst we understand that the nature our business can by some be considered to be controversial, we believe in positive engagement with the community or their representatives, on the basis of an examination of objective evidence. We want to be regulated on the basis of evidence not false perception or misrepresentation.

Conclusions

- William Hill is a significant local employer providing local employment opportunities.
- There is no evidence to suggest that betting shops in Haringey have a detrimental effect on the local community; just the reverse.
- We regret that this issue appears to have been highly politicised, rather than there being constructive debate between those who are lobbying for change and the industry.
- There is no betting shop saturation in Haringey and a proper evaluation of the use of retail premises in the Borough e.g. relative number of premises in A2 use compared to other use classes will, we believe, prove this out.
- As a significant part of the community, William Hill welcomes a proper objective review of the evidence and, in light of existing levels of regulation, believes that there should be a full regulatory impact assessment of the effect of any proposed changes on the betting industry.
- Suggestions that there should be isolated changes to planning legislation is ill conceived and would damage William Hill's business and that of the wider high street betting industry.
- Policy should be made on the basis of objective evidence and research; not on the basis of unevicenced moral or social perceptions promoted by opponents of the betting industry.

Appendix A

Shop Name	Branch Address	Opening Date
LAWRENCE RD	120a/122 West Green Road, London	05 January 1993
HEWITT	519 Green Lanes, London	06 January 1995
ROYAL	438/440/442 High Road, Tottenham, London	01 August 1987
GRAND PARADE	435 Green Lanes, Harringay, London	30 May 1984
DOWNHILLS	297/299/301 West Green Rd, London	01 August 1981
SUFFIELD	703 Seven Sisters Road, London,	01 August 1987
ENTERPRISE	94/96 High Road, Tottenham, London	24 November 1995
TALBOT RD	85 Broad Lane, Tottenham, London	10 February 1986
ACACIA	618/620 Lordship Lane, Wood Green, London	01 September 1988
MUSWELL HILL	303 Muswell Hill Broadway, London	01 October 1993
WOOD GREEN	8 The Broadway, High Road, Wood Green, London	15 October 1993
LORDSHIP LANE	427 Lordship Lane, London,	01 October 1995
SPURS	728/730 High Road, Tottenham, London	29 January 1997
TURNPIKE	17 High Road, Wood Green, London	11 January 1984
BRUCE GROVE	110/111/112 Bruce Grove, Tottenham, London	01 August 2003

CLYDE RD	375/377 High Road, Tottenham, London	20 November 1986
PHILIP LANE	276 Philip Lane, Tottenham, London	25 December 1985
WHITE HART LANE	793/795 High Road, Tottenham, London	11 October 2007
WALDECK	Part Ground Floor, 472/480 West Green Road, London	02 July 2008