



# NAMCO STATION™

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[www.namcoexperience.com](http://www.namcoexperience.com)

Rt Hon. Keith Bradley MP  
House of Commons  
London  
SW1A 0AA

## **Re: Proposed Gambling Bill**

Dear Rt Hon. Keith Bradley,

I am the General Manager of Namco Station, the Tenpin Bowling centre located in the Trafford Centre; we currently employ 4 of your constituents. I have decided to write to you to express concerns that I have with the proposed Bill in its current format.

I understand that a number of Trade Associations, including Tenpin Bowling Proprietor's Association (TBPA), Business in Sport & Leisure (BISL) and British Amusement Catering Trade Association (BACTA); have made various submissions to the Scrutiny Committee and the DCMS about a range of issues, which I support and are relevant to my business.

However I remain concerned that the unique characteristics of the Tenpin Bowling Industry have yet to be fully considered in the draft legislation. I have listed below my specific points, on which I hope you will feel able to make representations, to either John Greenway MP (Chairman of the Scrutiny committee) or any of the other Members of the Committee.

I understand the scrutiny Committee is about to write a report on the draft legislation and so I would appreciate a speedy response on this matter.

My specific points are:

1. The majority of tenpin bowling centres in the UK have alcohol licences in place, meaning that under the draft legislation, they will be treated as pubs. Clearly the design, style of operation, target market and product offering of the UK's 200+ tenpin bowling centres are radically different from a pub.
2. Tenpin bowling centres operate on average more than 17 type C & D gaming machines, whose contribution to the economic viability of the business is critical.



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It is not certain that existing tenpin bowling centres will be provided with Grandfather Rights because only the Policy Memorandum (note 7) covers this issue and not the main Draft Act. Local Authorities are not obliged to consider the Policy Memorandum in their deliberation.

4. Clauses 21 & 34 of the draft legislation would require tenpin bowling centres to seek permission from the Local authority for extra machines (over the 2 machines which will be automatically granted under a liquor licence) Clause 236 then applies conditions for the granting of permission for these extra machines.
5. The 8<sup>th</sup> condition of clause 236 is that children and young persons are excluded from participation. This would mean that tenpin bowling centres would not be able to provide pushers, cranes and other category D machines for use by under 18's, unlike family entertainment centres which remain completely unrestricted.
6. I understand that the guidance to Local Authorities is likely to identify that tenpin bowling centres are expected to have more than 2 gaming machines, however, this leaves tenpin bowling operators exposed to Local Authorities setting their own policies, irrespective of guidance, which is not an uncommon occurrence. I do not believe that any of the other categories of gaming are exposed in the same way as pubs and bowling centres are to a Local Authority policy decision.

I understand that demand for your time is high but I would urge that you find time to look at the serious implications of the draft Bill for tenpin bowling operators, such as myself.

I look forward to hearing from you

Yours Sincerely

Frank Johnson  
General Manager