

# Linland Ltd (Amusements)

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Draft Gambling Bill Consultation  
Gambling and National Lottery Licensing Division  
DCMS  
2-4 Cockspur Street  
London  
SW1Y 5DH

8 March 2004

Dear Sirs,

Reference the forthcoming scrutiny of the Budd Report, as an arcade operator I wish to raise my concern with some of the recommendations.

Our industry is part of the character of Portsmouth and Southsea in that it is a seaside resort and many families enjoy going to arcades as part of their holiday. Many local people also enjoy using the arcades.

A particular concern is Category "D" machines that children can play. While I obviously share the concern that there is a little problem gambling among children as possible, as do all responsible operators across the country, I still believe that there is not a major problem as regards children gambling. Indeed the Budd Report itself said that there was 'woeful absence' of research and that the 'vast majority of children playing come to no long-term harm. For many children playing small stake machines is part of the seaside experience.'

The Government is proposing for Category "D" machines that the maximum stake should be reduced to 10p (from 30p) and that the maximum prize should be reduced from £8 to £5. There is also an indefinite freeze proposed on the stake and maximum payout for these machines. Furthermore the Bill allows the minister to introduce an age restriction on these machines by means of secondary legislation rather than primary legislation and a full vote and discussion in Parliament. In addition Category "D" machines not paying out money are also reduced to a 10p stake and a prize worth £5, with the exception of cranes which remain with a 30p stake. BACTA is concerned that this will erode customer value in the case of cranes with the same stake of 30p but a £5 prize instead of an £8 prize, and there is concern for other machines that a 10p stake/£5 prize will not be economic for operators. I think that all Category "D" machines operating non-money prizes should operate on a 30p stake/£8 prize principle. There is a further problem in that "trading up", the practice of saving individual prizes won for a larger prize seems to be proposed to be prohibited for crane machines with a 30p stake. This is in spite of the DCMS and the Gaming Board consistently saying that this issue will not be revisited.

There does not seem to be a problem with children gambling at the moment. If the Government had come up with some research that it was a problem, I would understand why they would want to introduce restrictions. However, I remain concerned that they do so and put people's businesses and the character of seaside resorts in danger without any evidence of a problem is not justified and illogical.

A further concern is the issue of "Grandfather rights". I know this remains a concern for operators and the trade association that local authorities may decide not to grant permits to businesses that may have been operating for generations. This is a concern that needs to be addressed by the Government.

There continues to remain a concern that amusement arcades open to adults only should be able to compete with other adult only sectors of the industry on a level playing field. The draft Gambling Bill retains the proposal that only casinos should be allowed unlimited stake/prize machines.

The Budd Report assumes that young children play the machines on their own. Our experience is that most children come in with their families.

I personally think that we at the seashores are being sacrificed.

Yours sincerely,



GEORGE PEAK