



The Gambling Business Group's submission to the Housing, Communities and Local Government Committee's "Revitalising High Streets Inquiry"

1. The [Gambling Business Group](#) is a trade body representing the cross-sector land-based gambling sector, with social responsibility at the heart of everything we do. We have a broad membership of Adult Gaming Centres Bingo, Betting, Pubs, Machines and Suppliers, alongside supporting businesses including legal, licensing, finance and consultancy organisations.
2. Recently there has been an increased focus on a highly regulated sector comprised of less than 8300 premises across Great Britain, the most recent being the announcement from the Prime Minister regarding the Aim to Permit principle being removed from the Gambling Act 2005, which was announced after this Inquiry had opened.
3. Our submission focuses on the Inquiry's questions which are most relevant to our land-based gambling Membership.

What impact does the clustering of similar retail and service outlets, such as betting shops, vape shops and barbers, have on our high streets and community pride ?

Numbers of gambling premises

4. Gambling is one of the most rigorously regulated sectors of the British economy and, for land-based gambling operators on the high street, that regulation is double as both the Gambling Commission (the Commission) and the Local Licensing Authority (LA) have a range of powers.
5. The numbers of land-based gambling premises are dwindling year on year. According to the Gambling Commission's [Industry Statistics annual report](#) there were a total of **8,234** AGC, Betting, Bingo, Casino and FECs in March 2025 (compared to 12,307 in 2011) with the largest declines in betting shop numbers.
6. The Betting and Gaming Council have recently confirmed that 540 betting shops have closed since the last budget (William Hill closed over a fifth of its premises) Betfred announced the closure of over 130 shops from September and Paddy Power @100 shops).
7. In 2024, 82,000 people were employed in the gambling sector (both online and land-based) according to the [latest DCMS publication](#), and that number is reducing with every premises that closes, with over 4500 jobs lost from the betting shops closures alone over the past year.
8. Contrary to some unevidenced political opinions, there is no material increase in the number of new licensed gambling premises and certainly no increase in the clustering of gambling premises.

Where are people gambling

9. The Inquiry's Terms of Reference categorises betting shops as "*unwanted businesses*" yet provides no detail on why they are deemed to be unwanted, nor

does the Inquiry reference the above-mentioned points about the dwindling numbers of land-based gambling premises.

10. However he High Stakes: gambling reform for the digital age, 2023,"The White Paper", stated that *"millions of us enjoy gambling every year and most suffer no ill effects"*.
11. So where and how are these millions of people enjoying gambling? The latest gambling participation statistics below from the Gambling Commission's Gambling Survey for Great Britain Annual Report 2025 (Year 3) highlights that **lottery ticket purchases are by far the most popular gambling activity**, not betting nor other forms of gambling in highly regulated gambling premises.
 - Overall participation in any gambling activity (in the past 4 weeks) was **47%**.
 - When those who only took part in a lottery draw in the past 4 weeks are excluded from the overall gambling participation rate, **gambling participation falls to 27%**.
 - The **in-person gambling** participation rate (in the past 4 weeks) was **28%**. This falls to **17%** when lottery draw only players are removed.
 - The online gambling participation rate (in the past 4 weeks) was **38%**. This falls to **16%** when lottery draw only players are removed.
 - The **most popular in-person gambling** activities in the past 4 weeks were buying tickets for a National Lottery draw (31%); buying tickets for other charity lotteries (16%) or buying a scratchcard (12%).
12. As the Committee is aware, physical lottery tickets are purchased in supermarkets and newsagents and other retail premises, not in licensed gambling premises.
13. If betting premises are "unwanted" because they offer gambling, then why aren't supermarkets and newsagents on the unwanted list?

Planning

14. The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 brought in changes so that Adult Gaming Centres, betting shops, bingo halls and casinos are all sui generis. Planning permission is required to change use to or from a sui generis use, which already gives local planning authorities control over changes of use.
15. We note that the Prime Minister's announcement about Aim to Permit stated that *"the government will also consult on formally defining Adult Gaming Centres (AGCs) as sui generis, to ensure planning permission is required for any new Adult Gaming Centres*.
16. More recently during the Parliamentary Under Secretary's (Housing, Communities & Local Government) statement on Restoring Pride in the High Street he said *"Adult gaming centres are also not clearly defined in the Use Classes Order. This can leave local communities feeling powerless when new premises open in inappropriate locations, including near schools, or where there is already a concentration of similar premises."* This statement is misleading.
17. As stated in para 14 AGCs are already 'sui generis' by virtue of the fact that they fall outside the defined limits of any other use class (*Article 3(6)(b) of the Town and Country Planning (Use Classes) Order 1987*). We are not aware of any planning applications for AGCs that have applied via any other use class because:

- There are no permitted development rights into a sui generis use. Any new AGC in a unit not already lawfully in that use requires express planning permission – there is no Class E fallback and no prior approval route.
- Every application is determined on its merits, with full public consultation and a discretion to refuse. Proximity to schools, cumulative concentration and impact on the character of the town/city centre are already material considerations, and local plan policies restricting gambling uses in primary frontages are already routinely applied and upheld at appeal. Knowsley Council has used existing powers under the National Planning Policy Framework to develop a Town Centre Uses Supplementary Planning Document setting out the Council's approach to the development of hot food takeaways; pay day loan shops; pawnbrokers; and gambling uses.
- That sits on top of the gambling licensing regime including conditions attached to the operating and premises licence, local area risk assessment, and the LA's statement of licensing policy.

18. Given this information we trust that the Inquiry will note our objection to AGC's being portrayed as not complying with the strict planning use class controls.

Well regulated businesses

19. We know from our engagement with the Institute of Licensing, that LAs take a risk rated approach to inspections and that there are very few complaints or issues arising from gambling premises. The police in London have never reviewed a gambling premises licence according to the Chief Licensing Officer at the Met Police.
20. There is a raft of requirements that gambling premises must have to meet the licensing objectives. For example substantial investment is made on the necessary security including having high-definition CCTV inside and outside premises and the police have been known to access external CCTV footage as part of evidence of crimes taking place on the high street – crimes which were unrelated to the gambling premises. That footage would not have been available to them if not for the gambling premises investment.
21. Gambling premises work with Designing out Crime Officers (DOCOs) for advice on physical security measures, layout strategies, and access control to protect staff and customers and prevent robberies.
22. Many gambling premises operate customer safety initiatives such as Ask for Angela and Walk Safe (with some accredited as safe havens), whilst others are involved in BIDs and Purple Flag, and they raise money for local and national charities. These schemes do not regard betting shops (or other gambling premises) as unwanted.

Illegal gambling

23. Last year the Government allocated £26million for an Illegal Gambling Taskforce to tackle illegal gambling, (as opposed to focusing on lawful regulated gambling businesses).
24. In addition to this funding licence fees also cover the costs of dealing with illegal gambling at both a local and national level:
- DCMS' Guidance to Licensing Authorities in England and Wales on setting premises licence fees, which is cited in Part 36 of the Gambling Commission's statutory Guidance to Licensing Authorities, makes it clear that: "*the annual*

fee is to cover the reasonable cost of compliance and enforcement work including dealing with illegal gambling.”

- From October 2026 the Gambling Commission’s Operating Licence fee structure will also see all legitimate licensed operators paying again to fund the Commission’s activities to tackle illegal gambling.

What factors and approaches have led to successful high street regeneration in different parts of England.

No response

What impacts can improvements to a high street have on community pride and people’s sense of belonging

No response

What impact have recent changes to business rates had on high street businesses?

25. Legitimate licensed gambling premises already pay the following costs:

- Machine Games Duty
- Business Rates
- Licences – both from the Gambling Commission and Local Licensing Authorities. From October the Gambling Commission’s Operating Licence fees are increasing 25% and the fee bands are changing so for some operators the actual fee increased range from 60% to over 100%.
- National Insurance & wages
- Tax
- Energy Bills
- Statutory Levy
- Heavy investment in measures to protect consumers

26. The threat of increased business rates, along with the proposals to remove “Aim to Permit” will hit the high street, both economically and socially. Britain has already lost thousands of general businesses from the high streets with news every week of another national retailer closing down, and last year we lost one pub every single day.

27. This weakens the high street economy, stalls footfall, creates unemployment and reduces various tax income streams for the government.

28. If more premises are forced to close for economic reasons (or are refused to be allowed to open in the first place), then more consumers will turn to online gambling, if they haven’t already, and that brings them one step closer to the growing online illegal gambling market.

29. On the black market:

- There are no protections for local constituents.
- They don’t contribute to the new statutory Gambling Levy.
- According to the previous Chief Executive of the Gambling Commission “a significant proportion of illegal gambling is connected to wider organised crime“. He also described the illegal online market as “unsafe, unfair and criminal”
- He went on to say that “in other countries in Europe and elsewhere that had materially increased their tax rates and then seen a significant growth in illegal gambling”

30. By stigmatising highly regulated gambling premises as unwanted, increasing taxes and regulatory requirements it will reach a point where it’s impossible for

legitimate gambling businesses to operate on our high streets. Those that we are all trying to protect from risks of gambling harm may migrate to unregulated online offerings and illegal gambling dens, where all current protections are not in place nor enforceable.

31. There they will be out of reach of the third sector, currently being funded by gambling business payments to the Gambling Levy. The fewer regulated gambling businesses we have on our high streets, the smaller the Levy pot and the more unprotected players will become.

Are allocation methods for Pride in Place funding suitable to ensure funding reaches communities where it is most needed?

No response

How effective are the government's plans to address current challenges on high streets across England

32. The GBG is of the view that the solution isn't to take land-based gambling retailers off the high street either through taxation or more regulation, but for local authorities and industry to work together to ensure that they each play their crucial role in protecting local people, the local economy and community. The answer has to be to reverse the decline on our high streets, not to force the closure of even more businesses.
33. This will ensure continued financial support to the local authorities via the current level of business rates, to the Exchequer through duties (@£4 billion in tax) and the Gambling Levy which has been established to implement protections for vulnerable players to the tune of £100 million per year.