

DRAFT

**LB Merton
Betting Shops Research Papers**

**November 2018 draft
(2018 maps to be inserted)**

Table of Contents

Executive Summary:	3
Introduction:	4
Factors that may increase the number of betting shops:	4
Ways that local authorities can restrict the proliferation of betting shops:	6
Other London boroughs':	8
Merton's Research:	11
Conclusions:	13

DRAFT

Executive Summary:

- 1 This report explores whether there is a high number of betting shops in Merton and whether betting shops should be restricted in Merton through planning mechanisms.
- 2 Flexibility introduced by the Gambling Act (2005) and, until 2015, ‘permitted development rights’, may have contribute to the increase in the number of betting shops in Merton between 2005 and 2015.
- 3 However there have been some significant changes since Merton’s 2014 research:
 - In planning terms, national government has removed permitted development rights from all betting shops in England. Since April 2015 all new betting shops have to seek planning permission from the council and are within their own unique classification (Use Class “sui generis”) instead of being considered as *financial and professional services*)
 - For licencing, in 2017 and 2018 government announced the intention to reduce the stake possible for Fixed Odds Betting Terminals from £100 currently to £2, although this will require secondary legislation, which has not been enacted yet.
 - Local area profile - providers have to demonstrate that they have considered the character of the local area in requesting their licence. E.g. if a local school is nearby (new applications or variations only) applicants would have to undertake a risk assessment, demonstrating how they would minimise negative effects on the local school.
<https://mertonintranet.moderngov.co.uk/documents/s24632/Appendix%20C%20-%20London%20Borough%20of%20Merton%20Local%20Area%20Profile%20Gambling%20Act%202005%20September%202018.pdf>
- 4 For a planning policy to restrict the development of any type of development in Merton including betting shops in Merton, the council has to prove through evidence the harm that is being caused from the particular type of development in general, and not, for example, from anti-social behaviour relating to specific premises.
- 5 Using both primary and secondary research, Merton’s officers examined both planning and licensing records to identify if there has been a significant increase in betting shops in Merton in the last few years, in particular changes since the 2013 research.
- 6 The research concluded that:
 - Betting shops are located throughout Merton and are not overly concentrated in any one town centre;
 - Betting shops represent only a small proportion (always less than 4%, usually close to 2%) of the total number of shops in each centre;
 - There were 33 premises with a gambling licence in 2013 and now (2018) there are 34 premises in Merton out of over 2,000 shops. Although there have been changes in the locations, hasn’t been a significant increase or decrease in any one area over the past 5 years. There is wider evidence that there has been a nationwide increase in internet gambling during this period;

- Although there have been instances flagged up of anti-social behaviour relating to individual establishments, neither the Met police nor Council officers have flagged up persistence or significant antisocial behaviour issues in relation to all or most betting shops in general in Merton.
- 7 Officers brief research of other London boroughs', found that Merton also has one of the lowest number of betting shops in comparison to neighbouring boroughs' and other London boroughs'.
 - 8 National changes restricting permitted development rights (in planning terms) for betting shops, the proposed changes to the Fixed Odds Betting Terminals and a much greater awareness of gambling problems have all occurred in the last five years.
 - 9 Officers concluded that planning mechanisms to further restrict the development of betting shops are not justified in Merton at this time.

DRAFT

Introduction:

- 10 The purpose of this research report is to identify the number, location and change over time of betting shops in Merton and to explore whether the number of betting shops could be restricted in Merton through planning mechanisms such as developing planning policy or issuing an Article 4 Direction.

Factors that may increase the number of betting shops:

- 11 This section briefly explains how these are key factors, outside of the typical planning application process, which influences the number of betting shops in an area.

Gambling Act (2005):

- 12 The Gambling Act (2005) introduced a unified regulator for gambling in Great Britain and a new licensing for gambling to be conducted by the Commission or by Licensing Authorities, depending upon the matter to be licensed.
- 13 The Commission are responsible for granting operating and personal licences for commercial gambling operators, personnel working in the industry and some larger scale gaming. The Gambling Commission assess prospective operators to ensure that it has appropriate governance procedures and is compliant with the overriding aims of the legislation. If compliant, the Gambling Commission then issue licenses to prospective gambling providers. Successful applicants may then apply for a premises license from the Licensing Authority where it wishes to conduct its gambling activities.
- 14 Licensing authorities have powers to license gambling premises within their area, as well as undertaking functions in relation to lower stake gaming and compliance with the Gambling Act. The Licensing Authority is required to approve premises licenses for all gambling activities in the locality including:
 - Bingo;
 - Betting shops;
 - Adult gaming centres (high stakes electronic gaming);
 - Family gaming centres (lower stakes electronic gaming);
 - Casinos; and,
 - Racecourses and dog tracks.
- 15 The Act sets out three licensing objectives, which underpin the functions that the Commission and Licensing authorities will perform. These objectives are central to the regulatory regime. They are:
 - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime;
 - Ensuring that gambling is conducted in a fair and open way; and,

Borough Plan Advisory Committee – 29 November 2018

- Protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 16 The current gambling license framework, in which the Licensing Authority must ‘aim to permit’ restricts the power of the authority to act to prevent the clustering of betting shops and does not provide solutions to other amenity issues associated with the clustering of betting shops. Another significant change is the removal of a demand test within the Gambling Act which ensured that the provision of betting shops was proportionate to need.
- 17 In considering an application for a premises license, there are a number of license conditions which the Local authority can consider, these are known as mandatory, default and discretionary conditions of the license. Mandatory and default conditions are prescribed by the Gambling Act. Mandatory conditions cannot be varied by the Licensing Authority but default conditions can be altered or removed by the Licensing Authority.
- 18 The Licensing Authority does have limited powers to vary the conditions of the premises license under the discretionary guidance. Such variations may include the opening hours or security arrangements for the proposed gambling establishment. Once again, the conditions that the Licensing Authority can set within individual licenses are tightly prescribed by the Gambling Commission and cannot contravene guidance issued through the regulator. In summary, the Licensing Authority can only set conditions for a premises license where:
- They are relevant to make the building safe;
 - Are directly related to the premises;
 - Are fair and reasonable and relate to the scale of the premises;
 - Reasonable in all other aspects.
- 19 When the Licensing Authority is considering a premises license from a gambling operator, the Gambling Act specifies that representations may be made from a variety of local stakeholders including responsible authorities (e.g. Local Authority, police, planning, fire authorities), a person/ resident close to the prospective gambling premises, local business interests or representatives of any of the preceding groups (such as lawyers, Councillors or other community representatives). However, representations from any of the above parties can only be made if they are relevant to the three overarching gambling objectives as detailed in paragraph 14 above.
- 20 To note, public nuisance and public safety are not included in these objectives and the Council cannot take these into account in any representations that may be received when licences are applied for.
- 21 In order to influence gambling license decisions, local representations must produce sufficient evidence to be able to demonstrate how the granting of a specific premises license will affect the overarching gambling principles. All appeals against decisions made by the Licensing Authorities in England and Wales are made to the Magistrates Court.
- 22 At the time of writing in November 2018, the Gambling Act 2005 also allowed for up to four machines known as Fixed Odds Betting Terminals (FOBT) to be sited within any licenced betting premises. All betting shops in Merton have the maximum of four FOBT machines

located within them. Government research based on Gambling Commission statistics states that as at November 2017 there were 33,611 FOBT machines in Great Britain. The gross gambling yield from FOBT for April 2016 to March 2017 was £1.8 billion.

- 23 Public health and addiction based research indicated that these machines, which allowed clients to undertake multiple and repeated bets and gamble with substantial sums without restriction, were highly addictive and aggravated problem gambling. The gambling industry disagrees, saying there is no evidence of a causal link between these machines and problem gambling.
- 24 In October 2017, the Department for Digital, Culture, Media and Sport (DCMS) announced a range of proposals to strengthen protections around gambling. These included lowering the maximum stake on FOBTs from £100 currently to between £50 and £2. A consultation on the proposals, including the level of the new stake, closed on 23 January 2018.
- 25 On 17 May 2018, the Government announced that the maximum stake on FOBTs will be reduced to £2. This will require secondary legislation. No further details on the exact timescales are available at this point.

Use Class Order:

- 26 The Town and County Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'. The Use Class Order provides a schedule of class use for land and buildings under the Town and County Planning Order. The schedule of class use for land and buildings that is relevant to betting shops:
 - **A1:** Retail
 - **A2:** Financial & Professional Services
 - **A3:** Restaurant and Cafes
 - **A4:** Drinking Establishments
 - **A5:** Hot food Take-away
 - **Sui generis:** unique uses including betting shops and payday loans
- 27 Until April 2015 betting shops and payday loans were classed as "*A2 - financial and professional services*" under the Use Class Order. This meant that planning permission was not needed under 'permitted development rights' to change from another A2 Use (for example banks, estate agents) to a betting shop, nor from Class A3 (restaurant and Cafes), Use Class A4 (Drinking Establishments) or Use Class A5 (Hot Food Takeaways) to a betting shop.
- 28 In 2015, in response to council's and communities' pressure, government amended the Use Classes Order to remove this permitted development right. Betting shops and payday loan premises are now classed as "*sui generis*". Sui generis uses, including betting shops, payday loans, nightclubs, theatres, launderettes, car showrooms etc. always have to seek planning permission from the Local Planning Authority.

- 29 In circumstances where there are other local or site specific concerns 'Article 4' direction to remove permitted changes of use could be considered or planning policy could be imposed to restrict the number of betting shops in Merton.
- 30 For a planning policy or an Article 4 Direction to restrict development the Council has to prove through evidence the harm that is being caused from the particular development.

Ways that local authorities can restrict the proliferation of betting shops:

- 31 This section examines the methods by which the Council could restrict the proliferation of betting shops in Merton, should evidence support this.

Article 4 Direction:

- 32 An Article 4 Direction is applied to a specific geographic area and it removes the right to undertake the types of development specified in the Direction without seeking planning permission under the General Permitted Development Order 1995. For example, in Merton there is an Article 4 Direction for the John Innes and Wilton Crescent conservation areas that prevents people changing their windows or front doors without seeking planning permission.
- 33 Since 2015, all new betting shops and payday loan establishments have had permitted development rights removed nationally and have had to seek planning permission from the Local Planning Authority. Therefore an Article 4 Direction would not be relevant or applicable.

Planning policy

- 34 In 2014 at the time of preparing and adopting Merton's most recent borough-wide Development Plan (*Merton's Sites and Policies Plan*), research demonstrated that the number and concentration of betting shops in Merton would not justify introducing a planning policy or an Article 4 Direction to further restrict betting shops.
- 35 At this time, bars, restaurants, banks, estate agents, takeaways, cafes and many other uses on the high street could have changed to betting shops without the need for planning permission. However the council was not seeing an over-concentration of numbers or in any particular location, when compared with other high street establishments.
- 36 As referred to in the "Use Classes Order" section above, in 2015 government changed permitted development rights to require all betting shops and payday loans premises to seek planning permission; removing all permitted development rights.
- 37 Merton's emerging Local Plan takes the same approach as existing planning policy

Other London boroughs’:

38 There are other London local authorities who have similar concerns with the number of betting shops in their boroughs’ including Barking & Dagenham, Hackney, Haringey and Lewisham. In the following paragraphs, officers have summarised how these London boroughs’ have dealt with concerns relating to the proliferation of betting shop in their areas.

London Barking & Dagenham:

39 In 2012, the London of Barking & Dagenham has 50 betting shops located throughout the borough; representing the sixth highest concentration of betting shops in London. Some of these are concentrated in Barking Town Centre, Dagenham Heathway, Chadwell Heath and the shopping parades of the Becontree Estate.

40 The Council’s research which included successive high street surveys, local retail health checks and the borough’s retail study showed that the borough have an over representation of betting shops. It is considered that this overconcentration of betting shops is not desirable in terms of trying to sustain the viability and vitality of the borough’s centres therefore limiting the proliferation of betting shops is an important component of the borough’s strategic health and regeneration initiatives.

41 For this reason , Barking and Dagenham council took forward a holistic approach (the planning team working with various departments such as the property, licensing and NHS team) to stop the proliferation of betting shops in the borough. As part of this the Council has brought forward an SPD as well as a corresponding Article 4 Direction (as this was prior to 2015 national changes) with the aim of restricting the proliferation of betting shops on the high streets.

42 Barking and Dagenham’s SPD titled “Evening the odds: curbing the proliferation of betting shops” (2012) provides further guidance on the location and concentration of betting shops complementing policies set out in the Local Plan. The aim of the SPD is to preserve the diversity of the high street by reducing the proliferation of betting shops across the borough.

43 The SPD sets up:

- An exclusion zone – planning permission will not be granted for new betting shops within 400m of an existing permitted betting shop.
- Specific areas that betting shops can locate – the town and neighbourhood centres and the proposal will lead to no more than 5% of units within a centre or frontage being betting shops.

44 The Article 4 was used to remove existing Permitted Development Rights that allows the A3, A4 and A5 uses to revert to A2 without requiring planning permission. (this has since been

superseded nationally by the amendments to the Use Class Order in April 2015, removing all permitted development rights for betting shops)

London Borough of Hackney:

- 45 In the **LB Hackney**, the Community Safety & Social Inclusion Scrutiny Commission conducted a review of betting shops. The results showed that there were 64 betting shops in the borough; many of which cluster in areas of high social deprivation. Although the total number of betting shops has not increased since the Gambling Act 2007, there is still continued concern about their saturation.
- 46 This review recognised that the Council had limited powers to restrict the clustering of betting shops through licensing or planning, therefore they decided to continue to gather local information and complete further research as evidence to support potential future policies and to continue to lobby central government to create a separate use class for betting shops (*sui generis*). This was successful as government changed the Use Class Order in April 2015.

London Borough of Haringey:

- 47 Due to considerable community concern in 2009 and 2010 with regards to the number of betting shops in LB Haringey, the Overview and Scrutiny Committee completed a Scrutiny Review of the Clustering of Betting Shops in Haringey (April 2011). The focus of the review was to examine the propensity of betting shops to cluster together and to record what impact that this has had on local communities. As part of this review, the Council looked at whether the liberalisation of the Gambling Act (2005) precipitated a rise in gambling premises licensed in Haringey.
- 48 In 2013 (updated in 2016) there were 66 betting shops located throughout Haringey; 85% were located in the east of the borough and 42% of the shops were located in super output areas which are among most socially deprived (top 10% in England).
- 49 Haringey's report concluded the following:
- the total number of betting shops has remained largely the same since the Gambling Act (2005) came into force.
 - some betting shops had moved from local shopping parades to more prominent positions within local shopping centres, clustering in a number of areas throughout Haringey Green Lanes, Wood Green, and Tottenham compared to other parts of the borough.
 - It was the view of local police that betting shops were not significant contributors to local crime figures though did conclude that betting shops had become a focal point for crime and ASB in areas where there was already known to be a problem.
 - no evidence that the clustering of betting shops generated any significant footfall or trade for local retailers, nor added to the diversity or vibrancy of the host areas;

however the panel acknowledge that as may as 500 local jobs could be created from the betting shop industry.

- noted submissions from the Gambling Commission and GamCare which suggested that there was no evidence to support an association between the clustering of betting shops and problem gambling. Also any moves to restrict clustering would have little impact on problem gambling, given the availability of other betting mediums.

50 The review recommended the following measures:

- the use of an Article 4 Direction continues to be recommended approach suggested by Ministers to control the clustering of betting shops; this was negated by the national government amendments to the Use Class Order in April 2015 to remove permitted development rights from all betting shops.
- existing and future planning documents could be strengthened to include a clustering policy which sought to control the clustering of any retail, business or service use; to sit within Haringey's Local Plan
- continued efforts to lobby for change to gambling license legislation or to planning control regulations to enable local Councils and local residents to have greater influence on decisions which affect local communities.

51 As part of the Haringey's Development Management Policy DM46 (2017) sets out a policy which restricts the proliferation of uses including betting shops.

Haringey Policy DM46: Betting Shops

- A) *Proposals for betting shops will only be permitted where they are appropriately located within the Metropolitan Town Centre, a District Town Centre or Local Centre, having regard to Policy DM42 (Primary and Secondary Frontages) and DM43 (Local Shopping Centres).*
- B) *Proposals for new betting shops will be assessed against their impact on town centre vitality and viability, having regard to:*
- a The number of existing betting shops in the centre; and*
 - b The need to avoid overconcentration and saturation of this particular type of use.*

London Borough of Lewisham:

52 There are 71 betting shops located throughout Lewisham; with concentrations in Catford (6 units) and Lewisham town centres (9 units) and Deptford High Street. In Deptford High Street there are 8 betting shops along a stretch of 600 metres. Although Lewisham's internal research has shown that the number of betting shops has not increased throughout the years; they note that betting shops have moved from the tertiary shopping frontages to more primary shopping frontages. Therefore betting shops are in more prominent locations thus being more visible which may be contributing towards local concern about the retail

mix in some areas as well as the occurrence of crime and anti-social behaviour associated with betting shops.

- 53 Due to the local concerns with the over proliferation of betting shops on Lewisham's high streets, officers have considered how to restrict the development of betting shops through planning policy and Article 4 Direction. With using an Article 4 Direction, they were concerned with the changes associated with the creation of Article 4 Direction which allows for compensation claims and that the Article 4 Direction would not be implemented immediately. For these reasons they decided to not move forward with issuing an Article 4 Direction.
- 54 Lewisham Council adopted their Development Management Policies in late 2014. Although no specific policy was introduced regarding betting shops, the justification for the council's planning policies in town centres and shopping parades states that Lewisham will resist planning applications that would result in an unacceptable concentration of hot food takeaways and betting shops in any one area. This is similar to London-wide and Merton's retail planning policies.
- 55 Lewisham Council also responded to CLG's recommending that betting shops should be removed from the A2 Use Class and re-classified as sui generis, with no permitted change. Government took this forward in April 2015.

Merton's research:

- 56 Using both primary and secondary research and qualitative and quantitative information, officers examined both planning and licensing records, to identify how many betting shops currently operate in Merton and whether there has been a significant increase in betting shops in Merton in the last few years.

Primary Research

- 57 Merton completes an Annual Shopping Survey, where a member of the Future Merton Team record changes in the location and number of shops, restaurants, cafes, pubs and bars, hot food takeaways, financial and business services (including betting shops) throughout Merton. This survey has been carried out every year since 2004 and gives a strong record of change in Merton.

Secondary Research

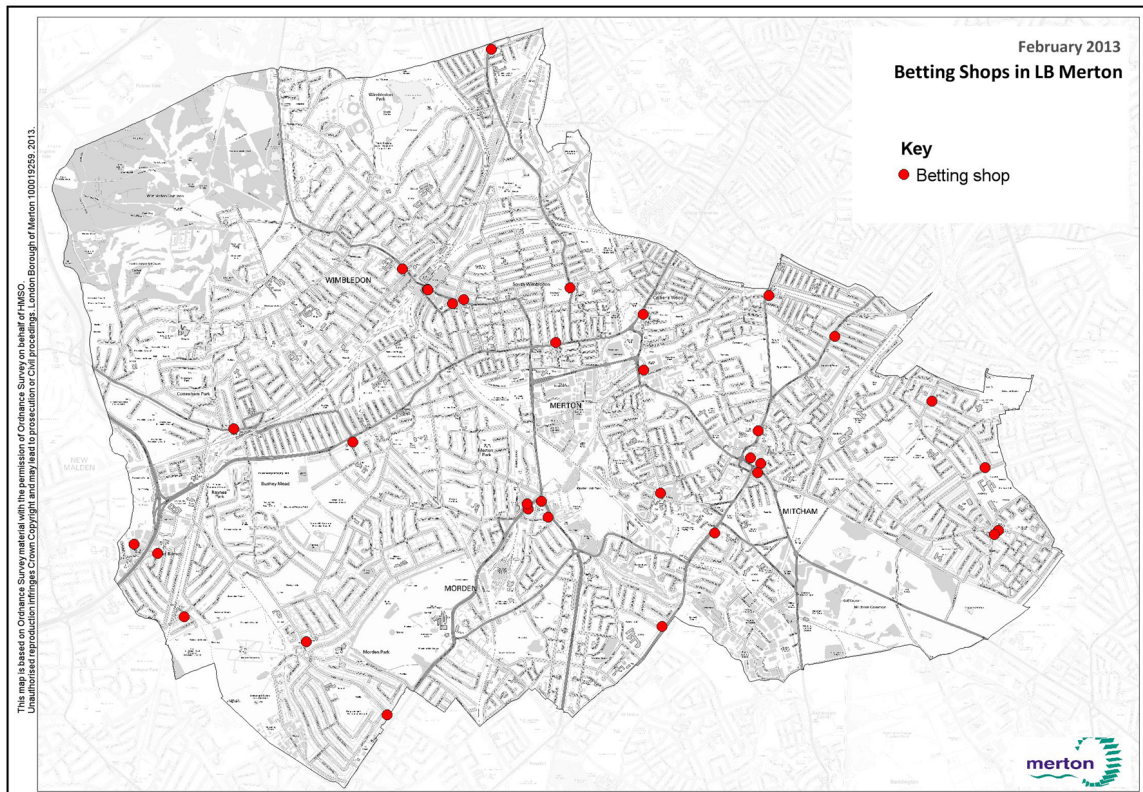
- 58 Some uses, as well as requiring planning permission in scheme where change of use permission is required, require licenses to operate. Licences are often required for the following uses to operate: cafes, restaurants, public houses, hot-food take-away, leisure and entertainment. Officers used Licensing records and compare these against Merton's Annual Shopping Survey to make certain that the results in this report are accurate. Please see *Appendix B: London Borough of Merton's Register of Gambling Premises* for a full list of gambling premises operating in Merton as of 2013. Using desktop research, we also looked

at the total number of betting shops in neighbouring boroughs' and other boroughs' located in London.

Research Findings

- 59 In 2011, 2013 and 2018, officers carried out extensive research on betting shops in Merton as this issue was highlighted by Councillors as a concern.
- 60 Officers analysed the number of betting shops from 2007 and 2012 though the gambling facilities at the Greyhound Stadium are excluded from this analysis.
- 61 In addition, we also spoke to the Safer Merton Team/ the police to see if there was evidence of harm caused by betting shops in Merton; either due to their overall number, cumulative impact in certain centres or demonstrable harm caused by their activities. Please see Figure 1 below which shows the locations of all Betting Shops in Merton as at 2013. Please also see graphs and maps set out in *Appendix C: Betting Shops Research*.

Figure 1: Map of Betting Shops in Merton as at 2013. To include in December 2018 – map of betting shops as at 2018



62 The research conclusions are:

- Betting shops are located throughout Merton and are not overly concentrated in any one town centre.

- Betting shops represent only a small proportion (always less than 4%, usually close to 2%) of the total number of shops in each centre.
- Although there are a large number of units in each town centre, which under the Use Class Order could open up as betting shops without the need for planning permission, there hasn't been a significant increase or decrease over the past 5 years. There is wider evidence that there has been a nationwide increase in internet gambling during this period.
- Neither the Met police nor Council officers have flagged up persistence or significant antisocial behaviour issues in relation to betting shops in Merton.

63 Officers brief research of other London boroughs' found that both LB Islington and LB Newham had some of the highest number of betting shops in London; both of these boroughs' had 80 betting shops. As illustrated in Figure 2: Merton also has one of the lowest number of betting shops in comparison to neighbouring boroughs' and other London boroughs'.



Conclusions:

64 Having considered the research findings, planning mechanisms to restrict the development of betting shops would not be effective or viable to pursue at this time in Merton.

DRAFT

Appendices

DRAFT

Comparison between 2013 and 2018 betting shops in Merton

The original list (in black) dates from 2013. Betting shops marked in red have been opened or closed between 2013 and 2018

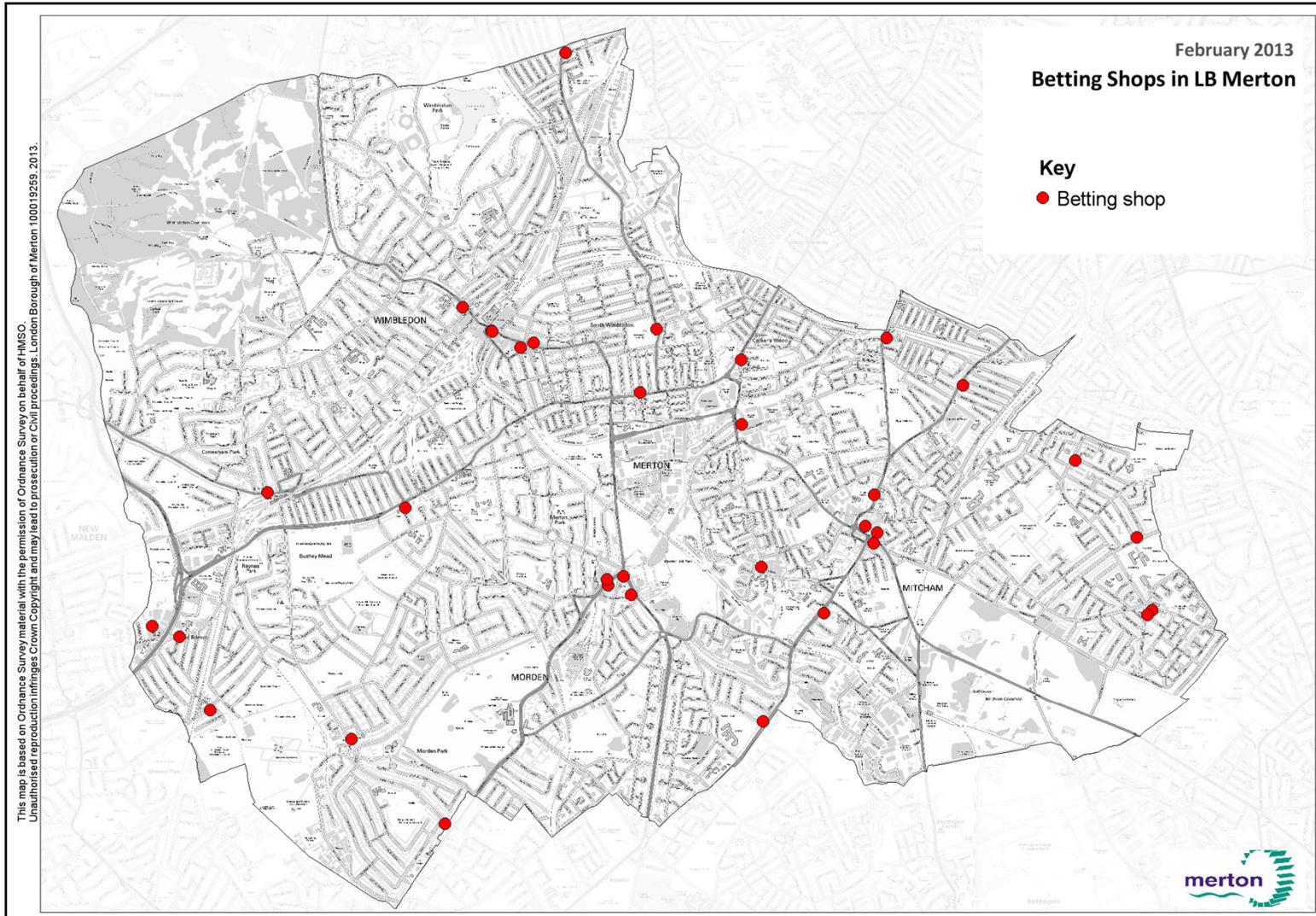
2018	Premises Type	Name	Address	Town	Postcode
1.	Adult Amusement Arcade	Agora	57 London Road	Morden	SM4 5HT
2.	Betting Shop	Betfred	1-3 Upper Green West	Mitcham	CR4 3AA
3.	Betting Shop	Betfred	9 Wimbledon Bridge	Wimbledon	SW19 7NH
4.	Betting Shop	Coral	55 Church Road	Mitcham	CR4 3BF
5.	Betting Shop	Coral	94 The Broadway	Wimbledon	SW19 1RH
6.	Betting Shop	Coral	7-9 The Broadway	Wimbledon	SW19 1PS
7.	Betting Shop	Coral	251 Northborough Road	Norbury	SW16 4TR
8.	Betting Shop	Coral	98 Bishopsford Road	Morden	SM4 6BB
9.	Betting Shop	Coral	Unit 1, 175 Burlington Road	New Malden	KT3 4LU
	Betting shop	Coral	Unit 15 Tandem Centre	Colliers Wood	SW19 2PE
10.	Betting Shop	Jenningsbet	11 The Broadway	Wimbledon	SW19 1PS
	Betting shop	John Warren	326 West Barnes Lane	New Malden	KT3 6NB

11.	Betting Shop	Ladbrokes	58/62 Coombe Lane	Raynes Park	SW20 0LA
12.	Betting Shop	Ladbrokes	19/21 Tudor Drive	Morden	SM4 4DP
13.	Betting Shop	Ladbrokes	2/4 Christchurch Road	Colliers Wood	SW19 2NX
14.	Betting Shop	Ladbrokes	31 London Road	Tooting	SW17 9JR
15.	Betting Shop	Ladbrokes	44 Wimbledon Hill Road	Wimbledon	SW19 7PA
16.	Betting Shop	Ladbrokes	174 Merton High Street	Wimbledon	SW19 1AY
17.	Betting Shop	Ladbrokes	415 Durnsford Road	Wimbledon	SW19 8EE
18.	Betting Shop	Ladbrokes	175a Streatham Road	Mitcham	CR4 2AG
	Betting Shop	Ladbrokes	Unit 2a Aberconway Road	Morden	SM4 5LN
19.	Betting Shop	Ladbrokes	17/19 Upper Green East	Mitcham	CR4 2PE
20.	Betting Shop	Ladbrokes	4 The Broadway	Wimbledon	SW19 1RF
	Betting Shop	Ladbrokes	18 South Lodge Avenue	Mitcham	CR4 1LU
21.	Betting Shop	Paddy Power	41 London Road	Morden	SM4 5HT
22.	Betting Shop	Paddy Power	2/4 Gladstone Road	Wimbledon	SW19 1QT

23.	Betting Shop	Paddy Power	3 Upper Green East	Mitcham	CR4 2PE
24.	Betting Shop	Stan James	48 London Road	Morden	SM4 5BE
25.	Betting Shop	William Hill	158/160 Chestnut Grove, Pollards Hill	Mitcham	CR4 1RB
26.	Betting Shop	William Hill	176/178 Rowan Road, London	Streatham	SW16 5HX
27.	Betting Shop	William Hill	356 Grand Drive	Raynes Park	SW20 9NQ
28.	Betting Shop	William Hill	1/2 Fair Green Parade, Upper Green West	Mitcham	CR4 3NA
29.	Betting Shop	William Hill	335/335a London Road	Mitcham	CR4 4BE
30.	Betting Shop	William Hill	66/67 Monarch Parade, London Road	Mitcham	CR4 3HB
31.	Betting Shop	William Hill	114 Haydons Road	Wimbledon	SW19 1AW
32.	Betting Shop	William Hill	5 London Road	Morden	SM4 5HX
33.	Betting Shop	William Hill	216/218 Burlington Road	New Malden	KT3 4NW
34.	Betting Shop	William Hill	344 Kingston Road	Wimbledon	SW20 8LR
	Track	Wimbledon Stadium	Plough Lane	Wimbledon	SW17 0BL

DRAFT

Figure 1: Map of betting shops in Merton as at 2013. *Map to be provided as at 2018*



DRAFT