

# **MINUTES OF THE LICENSING SUB-COMMITTEE HELD ON THURSDAY, 24 April 2025, 7:00PM – 9:10PM**

**PRESENT:** Councillors Kaushika Amin, Sheila Peacock (Chair) and Nick da Costa

**ALSO ATTENDING:** Councillor Anna Abela and Councillor Zena Brabazon

## **1. FILMING AT MEETINGS**

The Chair referred to the filming of meetings and this information was noted.

## **2. APOLOGIES FOR ABSENCE**

There were none.

## **3. URGENT BUSINESS**

There was no urgent business.

## **4. DECLARATIONS OF INTEREST**

There were no declarations of interest.

## **5. SUMMARY OF PROCEDURE**

The Chair provided a summary of the procedure for the meeting.

## **6. APPLICATION FOR A VARIATION OF AN ADULT GAMING CENTRE LICENCE FOR FUTURE LEISURE, 519 GREEN LANES LONDON, N4 1AN**

### **Presentation by the Licensing Officer**

Ms Daliah Barrett, Licensing Team Leader, informed the Sub-Committee that:

- The application was for an adult gaming centre.
- The application sought an increase in operating hours.
- The premises operated until 23:00 and the application sought to be able to operate 24 hours a day.
- The Local Area Gambling Risk Assessment could be found from page 17 of the agenda papers.
- The Green Lanes area was one of the areas of concern within the Council's Statement of Gambling Policy.
- The Police had requested additional conditions which had been agreed with the applicant.

- Representations had been made from Public Health, two ward councillors and the Licensing Authority.

### **Presentation by the applicant**

Mr Andrew Woods, Mr Gavin Tresidder, Mr Ben Tresidder and Ms Anna Zeitkiewicz, representing the applicant, informed the Sub-Committee that:

- The business owners had 15 similar premises (adult gaming centres) which they ran. A total of 14 out of 15 of these premises traded 24 hours a day, seven days a week.
- The premises was used during the night sometimes by shift workers and other patrons. There would be a maximum of five people at a time in these premises, maybe less. The business owners were very knowledgeable and experienced in operating licensed premises on a 24-hour basis. They knew their patrons, the types of patrons that used their services and they knew how to promote the licensing objectives.
- The premises had been open for three years having opened in February 2022.
- As an adult gaming centre, the premises offered a low stake in gambling. The highest stake in the premises would be a £2.00 and the average age of a patron was 35.
- The patrons were a mix of male and female and there was a condition not to try to beyond 23:00. The premises was also bound by a similar planning condition and therefore an application would still have to be made to the Planning Authority.
- Some of the representations referred to various planning policies.
- In relation to the Council's licensing policy, the business owners were aware of the area and it was notable that this application was not for a new application but an application to vary a licence.
- The premises had been trading for three years without any issues. None of the objectors had attended the premises to express any concerns.
- There were 24 Gambling Commissions general conditions that the premises had to comply with and it was not suggested that the premises did not comply with those conditions.
- There had been no suggestion that the premises did not comply with the licensing objectives.
- There was no suggestion that vulnerable adults in the community had not been protected or that crime was an issue at the premises.
- The Police had withdrawn their representation and had not expressed any concern with crime at the premises.
- The original local authority risk assessment had some points missing in terms of houses of multiple occupancy. The documents in the first set of additional papers was an updated and amended local authority risk assessment that ran for 47 pages. There was an addendum to the document which ran for 22 pages. These pages went through all of the risks where the business owners could see the potential risks to the premises and listed how these issues would be dealt with. None of the representations made stated that there was anything

lacking in these documentations. Residents had outlined their concerns regarding risks to vulnerable people in the community. All of these concerns and risks were dealt with in the documentation. The documentation set out how it would deal with these issues. The business owners dealt with the other licensed premises that operated 24 hours a day in the same manner. Similar documentation had been put forward to other relevant boroughs and none of the concerns expressed had come to light during the three years of trading where the business had operated until 23:00.

- The business owners were confident that all relevant measures were in place.
- In 2022, the business promised that it would promote the licensing objectives. There was no suggestion that this had not occurred.

In response to questions, Mr Woods, Mr Gavin Tressider, Mr Ben Tressider and Ms Zeitkiewicz, informed the Sub-Committee that:

- Patrons wanted the premises to stay open past 23:00. The other licensed premises that stayed open usually had customers inside. During the night, a steady flow of one or two patrons in and one or two patrons out of the premises would be the common occurrence over the course of the night.
- The premises had two members of staff on duty at all times and it was not the biggest licensed premises in the country. The licence had 24 conditions. Adult gaming centres did not have staff settled behind a screen. The staff generally tended to be on the shop floor. Whenever a patron would walk into the premises, they would be evaluated by staff. Staff would assess every patron who came into the premises and would continue to assess them during the time they were present. This had worked very well in terms of being able to manage and protect vulnerable members of the community.
- All staff were fully trained on how to make an assessment. This was done in several ways. Assessments were made based on appearance, body language, assessment of age with a Challenge 25 policy in place, assessment of character, mental capacity to place bets including if they appeared to have been drinking or taking drugs. All of this led to an ultimate assessment as to whether or not a particular patron should be allowed to stay in the premises.
- In preparing the Local Area Risk Assessment (LARA), it was completed with the staff members and managers. There was no external consultation.
- The LARA included the potential risk of vulnerable people from HMO (houses in multiple occupation) premises and the business dealt with the potential risk of vulnerable people entering the premises in the same way as it would for any patron coming into the premises from outside. Staff were trained to identify specific signs of behaviour and appearance. No vulnerable people were allowed into the premises any time of day or night.
- The maglock would be available at all times. Staff could turn it on if they wished to. The condition agreed with the Police was that the maglock would be in use from 22:00 to 08:00. This meant that the premises door would be locked between 22:00 to 08:00 and staff would have open the lock to allow a patron into the premises.

The Licensing Officer stated that condition 1 on pages 91 to 93 of the agenda papers related to access control on the main entrance door. Any new customers had to be

granted access by staff. This condition was then mediated and the hours were put in place. Condition 2 stated that staff should have access to clear CCTV, facial recording images of anyone seeking to enter the premises by way of a monitor system. This would help manage the amount of people inside, prevent banned users from entering etc and condition three stated that any lone workers were to be issued with personal alarms and provisions for a secure office or pod that was alarmed which offered a level of protection to staff. Condition 4 stated that adequate lighting should be provided to support CCTV during hours of darkness.

In response to further questions, Mr Woods, Mr Gavin Tressider, Mr Ben Tressider and Ms Zeitkiewicz, informed the Sub-Committee that:

- They agreed to the above conditions.
- All premises that were run by the applicant were uniformly informed of suspicious individuals.
- One of the most important parts of the Gambling Commission's conditions was the need to have interactions with customers. If an assessment was made on behalf of a patron and the assessment was positive, then an interaction would not be written down and the patron would not be told that an assessment had been made. However, if a patron had been in the premises for 20 minutes and showed erratic behaviour, then staff would be required to interact with the patron and would inform the patron why they were interacting with them and that interaction would be written down. The record would be maintained by the business. This was a requirement for staff. No premises could perform a clinical assessment on a patron. Staff were not trained to PhD levels in order to make a clinical assessment. However, they would try to look out for a number of signs that may give concern with regard to how the patron was behaving. Staff would make an assessment on whether or not the patron could continue staying at the premises.
- Interactions were logged on a smart-tablet and information from each shift was passed over as each handover. Customer profiles were created so that any further interactions with customers would be followed up. There was a clear way set out to deal with customers.
- The business had to report quarterly how many interactions that the premises had to the Gambling Commission and also reported on the outcomes of the interactions. The number of interactions across the entire business was around 2,420 for the last quarter. There had been approximately 282 interactions with regards to the premises itself in the first quarter of 2025.
- The Gambling Commission would be pleased with the number of interactions having taken place at the premises.
- Interactions were done with patrons, not just because there was concern regarding harm. Interactions were done with customers as part of the Know Your Customer policy. This helped the business to keep record of the customer and if there were any changes in the behaviour of the patron to suggest vulnerability, this would then be assessed.
- For three years, the premises had traded without any concerns or any issues. This was why there had been limited consultation with the residents.
- The business owners would be happy to hold a meeting with local residents' associations and councillors to a meeting every six months. This could be made into a condition if required.

- The premises did not operate like a betting shop. Staff would be patrolling the premises and not positioned behind a glass counter. One member of staff would be positioned near the front of the premises to assess patrons coming in. When patrons would come into the premises, the regular procedures would be followed in relation to age verification checks, identifying signs of possible vulnerability or other issues such as whether or not they would be allowed into the premises. Once the patron came into the premises, staff would then interact with the patron and interactions would be logged into the computer systems. If the patron was considered an unacceptable customer, staff would continue to interact with them. If the patron was to leave and come back another day, interactions would continue and this too would be logged into the computer systems. The business had a robust Safer Gambling Policy. The business had safer gambling messages with posters and leaflets that were clearly visible throughout the premises. Training was conducted with staff and with managers including testing of compliance.
- The Safer Gambling training would train staff on the Challenge 25 policy, identify vulnerable people, how to support the patron, placing limits on machines or providing a self-exclusion option. They would also be an assessment on the effectiveness of the evaluation, such as the customer response and what else would have to be done to support the patron.
- After all the assessments had been made on patrons, they would be checked by the venue manager and reviewed again at head office level. Any responses to the interactions would then be emailed back to staff.
- The business would agree to an SIA staff member being present at the premises as a condition between 23:00 and 07:00.
- The premises was open during times children were leaving school. The premises was open between 15:00 and a slightly later time when children were leaving school. No children ever tried to get into the premises and would not be able to in any case. The application sought licensable activities for the night-time hours, but already dealt with timings relating to when children would be walking past the premises. There had been no issues. Children did not find gambling premises attractive in any case.
- Patrons were allowed to self-exclude themselves from the premises and staff were allowed to suggest to patrons to self-exclude themselves. A self-exclusion scheme was used and any patron that wished to self-exclude would be excluded from another licensed premises within 1 kilometre of where they were first self-excluded.
- Across all of the licensed premises owned by the business within the quarter of 2025, there had been a total of 78 self-exclusions. A total of two of these were based in Haringey.
- In the previous week there had been no issues relating to Challenge 25, no patrons were asked to leave, there were no issues in relation to customer interaction and there was one self-exclusion.
- The business liaised with the Police regarding the application who were the lead responsible authority on crime disorder and the Police did not have any issues with the application. There was no crime disorder on the premises. The business had a 24-hour licence on all its premises with the exception of one. The business would look to liaise with wider members of the public in future.

- An interaction was when a member of staff would speak to a patron and make an assessment or speak to them to ensure that they were happy with their interactions at the premises before making an assessment. This was a conversation between a member of staff and a patron which was known as an interaction. This could mean looking out for vulnerability or a simple interaction. The Gambling Commission held the view but more interactions were better in the long-term. Not every interaction was an interaction based on vulnerability as they could be related to other things such as intoxication, the amount of time the patron had been on the premises or another issue. An interaction did not necessarily indicate a concern.

## **Presentation by interested parties**

Councillor Anna Abela informed the Sub-Committee that:

- She objected to the application on behalf of several residents who had contacted her.
- Many of the residents were also members of the Haringey Ladder Community Safety Partnership group and the Chair of the partnership had also submitted his objection. He was not present at this meeting as the partnership was meeting this evening and it was the only evening the Police could attend.
- She wished to oppose the application on two grounds. Firstly, the protection of children and vulnerable persons from harm and secondly, preventing gambling from becoming a source of crime and disorder.
- Green Lanes was an area of vulnerability in the Council's Statement of Gambling Policy.
- Hundreds of people from all over North London sought care for mental health conditions at the headquarters of the Barnet, Enfield and Haringey Mental Health Trust. This was a 10-minute walk from the premises.
- The Haringay ward was home to several people who received care in the community. It was also home to a women's shelter and was home to a high number of people who were particularly vulnerable. Several of these people were already fighting serious addictions and some of these people were more susceptible to problem gambling than the average population.
- There was significant evidence in academic literature that gambling in the early hours of the morning was correlated to problem gambling.
- A study by GambleAware, a charity that was funded by the industry, found that problem gamblers were more likely to place a bet between midnight and 04:00.
- The Royal Society for Public Health had also published research that showed that gambling at night was linked to an increased risk of harm because family members and friends were less likely to be aware of what was happening in those hours.
- These individuals were less likely to get an intervention from a friend or a family member.
- She had concerns that the premises would be open at a time when children would be on their way to school and the impact that the application could have on crime and disorder in the ward.

- Historically, Harringay ward used to be a 24/7 economy and, in the past, it had become a hot spot for Class A drugs, turf wars and very serious crime.
- There was a concerted effort by both the Council and the Police to turn Harringay ward into an evening economy and that included refusing 24/7 licences to gambling premises. Since then, there had been a significant improvement in the level of crime and disorder in the community.
- Councillors had been working with the Police on an action plan to address antisocial behaviour in the ward with Key Performance Indicators, so a lot of effort was going into this. She did not wish to see this progress be reversed.
- Another concern was that, often, patrons to these types of premises who became disappointed about the money that they had lost as a result of gambling tried to break the shop frontages of the premises. This was quite distressing for residents but also quite dangerous, because it left glass on the street.
- Residents were concerned that the extended opening hours would lead to an increase in crimes which were already quite common in the area. Burglaries, thefts from motor vehicles and other such crimes as a result of problem gamblers who sought to use stolen money to fund gambling were more likely to do so under the cover of darkness.

Mr Amit Kamal, representing the Garden Residents Association, informed the Sub-Committee that:

- The borough was already being impacted by crime and disorder and antisocial behaviour associated with late night gambling venues.
- The extended operating hours would worsen any issues.
- Green Lanes had already seen significant antisocial behaviour, theft and drug related incidents in the late-night hours. The application would add to these pressures.
- The streets immediately surrounding the premises were residential streets. People lived on them. Residents would face increased noise and disturbance from late night activity, affecting their quality of life. This was a real concern for all residents.
- The local area had seen a rise in street homelessness and substance abuse. Allowing extended access to gambling facilities would likely attract more vulnerable individuals worsening existing problems.
- The issues were in direct conflict with the Gambling Act to prevent gambling from being a source of crime and disorder.
- The application disregarded key local and national policies.
- The Haringey Local Plan policy emphasised the importance of a High Street that reflected community needs and values.
- Allowing gambling premises to operate late at night and become a kind of hot spot for gambling detracted from the inclusive family-friendly character of the Green Lanes.
- The Haringey Statement of Gambling Policy for 2022 to 2025 stated that Haringey was an area requiring additional protection from gambling related harm due to high levels of deprivation. Removing these time restrictions would go against that strategy. The planning application and subsequent appeals to extend the opening hours at another gambling premises about six doors down

at 513 Green Lanes had been refused. Many of the same objections and valid concerns about residential noise and antisocial behaviour were raised in that that application.

- The proposals were in direct conflict with the Council's Public Health 'super zone' approach which aimed to tackle gambling and other factors that could have a detrimental impact on health.
- The Haringey Statement of Gambling Policy which stated that "whether it was gambling ads all over your social media or gambling shops up and down the High Street, the gambling industry was firmly embedded in our day-to-day lives and it was vulnerable people who were paying the price. More than 8,000 people in Haringey had a serious gambling habit with disastrous consequences for them and their loved ones. Here in Haringey, we are determined to lead the way in battling this outdated industry".

Councillor Zena Brabazon informed the Sub-Committee that:

- Councillors had worked incredibly hard in the ward to make Green Lanes a safe and liveable high street.
- There had been a general consensus with all the businesses that business hours ended at 02:00 at the latest.
- A 24-hour licence in the ward would break a genuine consensus amongst all the businesses and particularly for gambling in an area of such vulnerability.
- There were more HMOs in Haringay ward than anywhere in the borough - about 800. It was a problem for local residents which caused destabilisation in the area. There were many complaints about antisocial behaviour and the problems that emanated from very destabilised type of housing.
- Many residents were extremely vulnerable and many had been placed by other authorities or had mental health problems.
- Mental health was a very serious problem in the ward.
- There was a 24-hour supervised premises for people who were homeless in the area. There was a hostel for women who were homeless. There was a charitable premises.
- There was a hospital which was a huge inpatient facility - people with severe mental ill health. Residents there would be extremely vulnerable to any inducements to possibly gamble.
- If the premises was open at night and residents had nowhere else to go or were encouraged in some way, then residents could participate in something which could become addictive.
- She would ask the Sub-Committee to refuse the application.
- The premises should maintain the existing operating hours. There were lots of gambling premises in the area, due to the high levels of vulnerability in the community.
- Gambling premises of this kind would not be found in wealthier areas of London such as Kensington or in Knightsbridge or in Mayfair.
- Aim to permit did not mean to permit for 24-hours.

Ms Marlene D'Aguilar, Public Health, informed the Sub-Committee that:

- It was important to ensure that inequalities in health were not being increased.
- The vulnerable needed to be protected.
- Consultation was not carried out by the applicant and there seemed to be a complacency in thinking that the application had covered all bases.
- Since last year, crime had gone up in the area by 12%.
- There was new research last year that talked about gambling outlets as agents of local area disorganisation. It had an association with crime and impact in deprived areas.
- In the west of the borough, there was only six or seven gambling premises and 58 on the other side of the borough.
- Vulnerability levels in the area was extremely high.
- There was concern about the children going to school in the morning.
- Children had reported their fear of going down the high street, particularly going past gambling outlets.
- Parents had reported that when people suffered losses from gambling, the crime was not always committed in the premises, but was taken out on the community on the high street directly outside.
- There was a disconnect in recording crimes that were related to gambling which happened outside and sometimes inside homes.
- There was a high level of domestic violence, including those which were gambling related.
- This not only had an impact on the local community, it had an impact on the resources of the Council, the NHS and other statutory agencies that had to respond to the impacts of gambling harms.
- Gambling harms were taken very seriously by the Council and the borough was one of the leading councils on gambling harms in London.
- The Health and Wellbeing strategy stated that the high street must be a healthy high street and gambling must be tackled.
- Aim to permit did not mean 24 hours.
- The hours should stay as they were.
- The Sub-Committee should refuse the application.

Ms Gabriella Martino, resident, informed the Sub-Committee that:

- Areas with three or more betting shops had experienced nearly three times more crime than areas without them.
- Residents experienced the impact of the crime, noticed it increasing over time and spent a lot of spare time dealing with the Police and talking to the Council about how to mitigate the issue.
- Refusing the application would support efforts to improve the local environment from a crime perspective.
- There were many vulnerable people in the area and the area had multiple schools and nurseries, addiction recovery centres and a women's refuge.
- Residents were concerned that extending the hours would directly expose individuals to greater harm.
- The application would make the area less safe and less welcoming for those coming out in the evening and visiting the local high street which was full of really well-loved local food and beverage businesses and other shops which

appealed to families and a diverse range of people. The application could potentially impact on their success and the success of the high street more generally.

- There were many other gambling premises nearby.
- The area was saturated for gambling premises.
- The application would set a dangerous precedent for other premises to seek similar extensions, including one which recently sought to extend its hours, but was refused by the Planning Authority.
- Green Lanes was a centre for international food. The area brought together a great mix of cultures. The area also sat adjacent to a big residential population.
- Businesses and residents were not consulted in any form.
- She felt that the application would affect the vibrancy and the success of the high street.
- The application should be refused for the sake of community safety, well-being and the success of the local high street.

In response to questions, Ms Martino, Mr Kamal, Councillor Brabazon, Councillor Abela informed the Sub-Committee that:

- Class A drugs had been dealt on the High Street outside the premises.
- Litter had been found outside including glass bottles.
- There were issues with fly-tipping and disorderly and noisy behaviour.
- There were groups of men who hung around the premises which residents could find distressing.
- There had been instances of smashed windows nearby.
- There was a cycle of litter, drugs and crime that was subject to the outside area that was distressing to residents.
- It was noticeable that the noise reduced after 01:00 and there was a concern that it would increase on the basis that the operating hours were increased. There was also concern that it would lead to prolonged periods of crime and disorder.
- The area over the years had been subject to a tacit agreement that the latest time for any licensed premises would be 02:00. There used to be a lot of antisocial behaviour in the area. However, the businesses, the Council and the Police had worked together to produce a high street that was very profitable and had progressed well.
- There was a very large hostel in Green Lanes with many vulnerable people. It was a privately run hostel with residents placed by other authorities. Many of the people that lived there had serious drug problems.
- The Council had led the way in making sure that gambling did not have a negative impact on the community. There was a serious public health issue as the area that was home to a significant number of vulnerable people and the numbers were much higher in comparison to other wards. There was also a health inequality risk.
- Green Lanes used to be a location of very serious crimes and gang related activity. A concerted effort was made to change this and a key component of that was to not allow licensed premises to operate on a 24-hour basis. If the application was granted then it would be the only licensed premises in the area that could operate 24 hours a day, seven days a week. Since the area had

moved to an evening economy, there was still antisocial behaviour area, but it was noticeably much calmer and granting the application could reverse the work that had been done in the area.

- In relation to staff training, despite the 286 interactions, there had been very few people who had been banned or removed from the premises. There was also very little data on how many people have been refused to entry into the premises.
- The lack of consultation with residents belied a casual approach to community engagement.
- The amended LARA did not appear to reflect the real risk in the area. The real issues in the area could not be something that the applicant was responsible for as gambling premises would always be located in deprived areas. Therefore, various things had to be done to mitigate the issues as much as possible.
- Public Health did not see people on a day-to-day basis. The department had a Gambling service set up in the borough. These were two clinics in the borough that was unique to London. Adult gaming centers would have been allowed to increase the number of machines they could have in the premises. The Government had put a pause on this as they had realised there were more vulnerable people who could not be protected. This implied that the machines could not protect vulnerable people.
- The applicant had not meaningfully engaged with the concerns raised by the local area profile and issues raised by residents. The applicant had not undertaken an area specific response. There were many vulnerabilities and risks in the area.

To summarise, Councillor Abela stated that the application would not protect children and vulnerable persons from harm. The Council's own Statement of Gambling Policy stated that Green Lanes was an area of vulnerability and there were many examples of vulnerable individuals who called the area around Green Lanes their home or who frequented the area regularly. There was research that showed a link between gambling between the hours of 00:00 and 04:00 and problem gambling. Research also showed that individuals who gambled in the late hours were less likely to receive interventions and support from family and friends. Decades of work had gone into improving the safety of Green Lanes, reducing the crime in the area and this was largely down to the fact that Green Lanes had moved from being a 24/7 economy to an evening economy. By making a precedent of allowing a 24/7 licensed premises, the Council could be reversing decades of hard work by the Council, the Police and community groups to turn the area into a safer area. She urged the Sub-Committee not to set such a dangerous precedent.

To summarise, Mr Kamal stated that he would echo the comments of Councillor Abela.

To summarise, Ms Martino stated that the application was worse than she had originally thought due to the locked door and blank frontage. It went against everything that residents worked really hard for which was a vibrant, safe family-friendly high street. She opposed the application.

To summarise, Mr Woods stated that in relation to crime and antisocial behaviour, the Police made no objection to the application or had provided any evidence of any crime connected to the premises. There was no crime connected to the premises. He understood that some people did not like gambling and gambling premises, there had been some great generalisations when discussing crime with reference to windows being broken by unhappy customers, burglary, thefts with people who had gambling problems. There was no evidence that connected any of this to the premises. Those submissions were simply unfounded. There was criticism of the applicant for failing to meet the necessary standards in the documentation provided. However, there was no criticism on any specific thing that the applicant had not done. There was only a very general criticism of 70 pages of detailed risk assessment, five of which set out in detail the local area profile. There was a certain lack of understanding. There was a CCTV camera on the outside of the premises which covered Green Lanes. Children did not come into the premises. They were not allowed into the premises in any case. They did not go into any of the other 14 premises operated by applicant. Whilst he was aware and understood the feeling about gambling premises, he would ask the Sub-Committee on points such as those to take into account that some of the general statements were unfair on the applicant. The applicant had not simply completed the risk assessments and other procedures as a matter of course. The applicant was a family run responsible business who employed senior and experienced people to ensure that vulnerable people were protected. The business had carried out 282 interactions. Ten years ago, if an applicant had said they had not had any interactions, a Sub-Committee may comment that it should be doing many more interactions. There was now an implied criticism of having done too many suggesting that there may be problems in the area. What it really suggested was that this applicant protected, looked after and cared for members of the community. The applicant did not want vulnerable people in the premises. In relation to the local plan, much of this involved planning. If the application was granted, the premises could not open immediately and a planning application would still have to be made. A lot of the points made by the objectors about a local plan would likely be made if a planning application was made, but he would ask the Sub-Committee to assess the relevance of some of the points to this application. Although some of the points were well made in relation to a planning application, they were not necessarily relevant to this application. The applicant had done a noise impact assessment. There were no noise issues connected to the premises. There was no evidence that issues relating to loitering and litter was connected to the premises. Having read all of the representations, none of the representations stated that the premises did not behave responsibly or actively caused problems. Not liking gambling was not a reason under the Gambling Act to refuse an application. Some objectors did not wish the premises to have longer hours. This was not necessarily a reason to refuse the application either. The question was if whether the applicant promoted the licensing objectives, protected vulnerable people and had a premises unconnected to crime. The applicant had been operating in the area and had evidence to say that for three years until 23:00, there had been no issues. There had been no individual who had been vulnerable and was allowed to gamble. There was no smashing of any machines or smashing of a window. All of the concerns had not actually happened as premises staff took issues extremely seriously. The application had taken some time to put together. The lack of liaison was not complacency, but hard work to ensure that the premises was run correctly. He apologised as a team for lack of liaison with residents and would be inviting people to a meeting at the premises whether the application was

granted or not. If it was granted, he would be more than happy to have the meeting as a condition. The premises did protect vulnerable adults and did not lead to crime and disorder, but aim to permit did relate to the application in general. The premises promoted the licensing objectives. In this case, the evidence was present due to the three years of un-blemished trading. In 2021, when the application was granted, there were quite a few objections to the application. Some by residents' associations who were objecting to the variation. There were concerns expressed about granting the application. The Sub-Committee at the time was informed that the issues were being taken seriously, measures were in place and that vulnerable people would be protected. Three years later, it was possible to observe this had been done and the same commitment would be made to the Sub-Committee now if it granted the application to allow the applicant to trade into the later hours. Premises staff would make the commitment to promote the licensing objectives and ensure that vulnerable people were protected and to liaise on a regular basis with the residents' groups who would be invited to meet with staff.

## **Adjournment and Decision**

At 9:10pm, the Sub-Committee withdrew from the meeting together with the Legal adviser and clerk to deliberate in private. The Sub-Committee had heard and considered representations from all those who spoke. Legal advice was given to the Sub-Committee on the options open to them and the need for any decision to be proportionate. The Sub-Committee decided to grant the application and revoke the licence.

## **RESOLVED**

The Licensing Sub Committee carefully considered the application for a variation of a Betting Premises Licence to allow 24 hour opening for an Adult Gaming Centre at Future Leisure, 519 Green Lanes London, N4 1AN

In considering the application, the Committee took account of the London Borough of Haringey's Statement of Gambling Policy, the Council's Gambling Local Area Profile, evidence from Public Health, the Gambling Act 2005, the Gambling Commission Guidance, the report pack and the written and oral representations of the Parties.

### **The Committee resolved to:**

#### **i. Refuse the application.**

##### **Reasons:**

The Committee had regard to the promotion of the Licensing Objectives as set out in the Gambling Act 2005, particularly:

- The prevention of gambling from being a source of crime and disorder, being associated with crime and disorder, or being used to support crime; and
- The protection of children and other vulnerable persons from being harmed or exploited by gambling.

*Section 153 of the Gambling Act 2005* provides that a licensing authority shall aim to permit the use of premises for gambling if it is:

- a) In accordance with any relevant code of practice under section 24,

- b) In accordance with any relevant guidance issued by the Commission under section 25,
- c) Reasonably consistent with the licencing objectives (subject to paragraphs (a) and (b), and
- d) In accordance with the statement published by the authority under section 349 (subject to paragraphs (a) to (c)).

All four limbs must be satisfied. The “aim to permit” is not a trump card. If the application fails on even one of these grounds, it may be refused.

The Committee had careful regard to the Local Area Profile (“LAP”) and noted that the subject premises is:-

- located in Green Lanes which is a designated high risk area in Haringeys Statement of Gambling policy (2022-2025)
- located in close proximity to educational establishments (school super zones);
- close to a centre dealing with addictions (more than 8,000 people in Haringey have a gambling addiction)
- close to women’s shelters
- close to hostels
- situated in an area of high gambling associated crime;
- situated in an area of deprivation (more HMO’s than anywhere else in Haringey) ;
- close to locations that are frequently visited by those who are unemployed; and
- close to the location of businesses providing instant access to cash, such as pawn shops.

The Applicants Submitted that:

- The LARA and addendum prepared in advance of the application acknowledge Haringey’s Statement of Gambling Policy and the Local Area Profile.
- The premises has traded without issue since 2022 (for 36+ months).
- The safeguards it has put in place (double-staffing, CCTV, Maglock, Think25) are compliant with the Statement of Gambling Policy (“SoGP”) expectations.
- No responsible authorities objected — including the police.

The Committee is entitled to consider local risk evidence, representations from residents and councillors, and the broader impact on the licensing objectives.

The Committee found that:

**1. The SoGP requires enhanced safeguards in high-risk wards like Harringay.**

The LAP specifically flags Harringay as high-risk for gambling harm.

- Paragraph 1.18 of the correct SoGP expects *bespoke, locally responsive* mitigation, not boilerplate national practice.

**2. The LARA is largely generic, not site-specific and did not take into account the high risk profile of Harringay .**

- The format, language, and listed controls appear identical to those used at other sites by the same operator.
- The addendum introduced no new safeguards, partnerships, or operational changes in response to the LAP.

**3. There was no community engagement prior to the application.**

- The SoGP expects operators to proactively assess local context *before* applying — and to consult where there is significant community impact.
- In paragraph 38 of their Case Summary, the applicant offers **future engagement** *after* grant. Given the large number of objections raised by the local community to their initial licencing application the Committee would have expected the Applicant to demonstrate effective engagement with the community prior to submitting the current application. The Committee would like to encourage the Applicant to take a more active role in engaging with the local community to mitigate against the risk of harm to the licensing objective to protect children and other vulnerable persons from being harmed or exploited by gambling.

#### **4. Evidence from Public Health re detrimental impact on communities where gambling outlets are in operation**

- 12% increase in criminal disorganisation
- Increased risk to children and vulnerable persons
- The impact of losses that occur in gambling outlets is felt in the wider community and homes.
- The risk posed to children and particularly vulnerable persons from being harmed or exploited by gambling by the proposed increase in operating hours could not be mitigated.

#### **5. Absence of police objection is not determinative.**

- Gambling Commission Guidance (6th ed.) – para. 6.30: “The absence of objections from responsible authorities does not mean that an application must be granted.”

The Committee considered that it needed to be satisfied that the Applicant had robust measures in place to uphold the licensing objectives and to mitigate against the specific risks from gambling harm in the area.

The Committee had in mind that the Guidance issued to Local Authorities by the Gambling Commission is that they should aim to permit where the requirements were met. The Committee, however, was not satisfied that the Applicant had demonstrated effective engagement with the local community (in particular the local Residents Associations) nor had they a bespoke mitigation plan in place that addresses the cumulative risks in the area and the increased potential risks caused by the late night hours proposed.

The Committee was concerned that if the application was allowed the exposure to gambling in the area would be increased and in the absence of meaningful engagement with the local community this would likely result in harm being caused to the licensing objective to protect children and, more particularly, other vulnerable persons from being harmed or exploited by gambling.

The Committee were unconvinced that there were sufficient measures in place to identify vulnerable persons who are able to conceal the extent of their gambling or any related underlying issues. In addition research shows that gambling between midnight and 4am leads to problem gambling due to lack of awareness of family /friends and thus fewer interventions.

The Committee considered that given the sensitive location of the premises and the evidence and representations before it, it was not confident that the measures in place to identify and support vulnerable persons were robust or bespoke enough and that an

extension in the premises' operating hours was therefore likely to lead to harm to the gambling objectives.

Whilst the Committee noted that there was no objection from the Met Police and no representative was in attendance the Committee also noted that the five objectors remained dissatisfied with the Applicant's explanation of how it would mitigate against the risk of increased Anti-Social Behaviour and that risk posed to vulnerable persons from being harmed or exploited by gambling by the proposed increase in operating hours.

The Committee carefully considered the Applicant's argument that their other 14 similar premises operate for 24 hours a day and that there have been no incidents/reports of criminal behaviour linked to this property in the 3 years it has been in operation (since 2022). However the Committee also noted that it is not obliged to wait for harm to occur and it may act on a reasonable risk-based assessment supported by:

- Local Area Profile,
- Public health evidence,
- Ward councillor and resident testimony.

**Appeal Rights** This decision is open to appeal to the Magistrates Court within the period of 21 days beginning on the day upon which the appellant is notified of the decision. This decision does not take effect until the end of the appeal period or, if an appeal is lodged, until the appeal is dispensed with. The address of the Highbury Magistrates Court is: Highbury Magistrates' Court, 51 Holloway Road, London N7 8JA.

## **7. NEW ITEMS OF URGENT BUSINESS**

There were none

CHAIR: Councillor Sheila Peacock

Signed by Chair .....

Date .....24 April 2025.....