

NOTICE OF MEETING

LICENSING SUB COMMITTEE

Thursday, 22nd May, 2025, 7.00 pm - Microsoft Teams (watch the live meeting [here](#) and watch the recording [here](#))

Councillors: Anna Abela, Sheila Peacock and one other councillor to be named

Quorum: 3

1. FILMING AT MEETINGS

Please note this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. Members of the public participating in the meeting (e.g. making deputations, asking questions, making oral protests) should be aware that they are likely to be filmed, recorded or reported on. By entering the 'meeting room', you are consenting to being filmed and to the possible use of those images and sound recordings.

The Chair of the meeting has the discretion to terminate or suspend filming or recording, if in his or her opinion continuation of the filming, recording or reporting would disrupt or prejudice the proceedings, infringe the rights of any individual, or may lead to the breach of a legal obligation by the Council.

2. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

3. URGENT BUSINESS

The Chair will consider the admission of any late items of Urgent Business. (Late items will be considered under the agenda item where they appear. New items will be dealt with under item 7 below).

4. DECLARATIONS OF INTEREST

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

- (i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
- (ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct

5. SUMMARY OF PROCEDURE

The Sub-Committee will first hear from the Licensing Officer. After that, the applicant will present their application and the Sub-Committee and objectors will have the opportunity to ask questions. Then, the objectors will present their case and the Sub-Committee and objectors will have the opportunity to ask questions.

All parties will then have the opportunity to sum up, and then the meeting will conclude to allow the Sub-Committee to deliberate and reach a decision. This decision will then be provided in writing within five working days of this meeting.

6. APPLICATION FOR THE VARIATION OF AN ADULT GAMING CENTRE LICENCE AT LITTLE VEGAS, 17 HIGH ROAD, LONDON, N22 6BN (NOEL PARK) (PAGES 1 - 74)

To consider an application for a variation of an adult gaming centre licence.

7. NEW ITEMS OF URGENT BUSINESS

To consider any items of urgent business as identified at item 3.

Nazyer Choudhury, Principal Committee Co-ordinator
Tel – 020 8489 3321
Fax – 020 8881 5218
Email: nazyer.choudhury@haringey.gov.uk

Fiona Alderman
Assistant Director of Legal & Governance (Monitoring Officer)
George Meehan House, 294 High Road, Wood Green, N22 8JZ

Wednesday, 14 May 2025

Report for: Licensing Sub Committee 22nd May 2025

Item number: 6

Title: Determination of Application for the Variation of an Adult Gaming Centre Licence for Little Vegas, 17 High Road London N22 6BN

Report authorised by : Director of Environment & Residents Experience.

Lead Officer: Daliah Barrett – Licensing Team Leader

Ward(s) affected: **Noel Park**

Report for Key/

Non Key Decision: **Non key**

1. Describe the issue under consideration

This report asks the Licensing Sub-Committee to consider an application for a Variation of a premises licence for an existing Adult Gaming Centre, under section 159 of the Gambling Act 2005. The application has drawn representations from a responsible authority and interested parties, therefore a hearing is required.

2 Principles to be applied:

This application must be considered under the three licensing objectives:

- 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
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

2.1 Recommendations

The Sub-Committee is asked to determine whether to grant the variation application seeking a 24 hour operation for an existing Adult Gaming Centre Premises Licence at 17 High Road London N22 6BN

A copy of the application for the variation of the premises licence and Accompanying documentation that the applicant submitted with their application is at **App1**.

- 2.2** On considering an application for a premises licence (whether at a hearing or not) a licensing authority shall
- (A) Grant it or
 - (B) Reject it.

- 2.3** The Licensing Sub-Committee is required to give appropriate weight to the representations (including supporting information) presented by all the parties, the Guidance issued pursuant to section 164 of the Act, the Council's Statement of Gambling Policy and the steps that are appropriate to promote the three Gambling objectives. Having considered those relevant matters, the Licensing Sub-Committee is required to take the following steps as it considers appropriate for the promotion of the licensing objectives.

- 2.4** Pursuant to section 169 of the Act, where the Sub-Committee issues a premises

licence, it may attach a condition to the licence or exclude a default condition that would otherwise be attached to the licence under section 168 of the Act. A condition may not be attached to the premises licence that prevents compliance with a condition of the operating licence which authorises the applicant from carrying out the activities for which the premises licence is granted.

3 Reasons for decision

In exercising their functions under this part a licensing authority shall aim to permit the use of premises for gambling in so far as the authority think it-

- (a) In accordance with the 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 licensing 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))

- 3.1 In determining whether to grant a premises licence a licensing authority may not have regard to the expected demand for the facilities which it is proposed to provide.

4 Alternative options considered

- 4.1 Where a valid representation has been received in response to an application for a premises licence under the Act, the licensing authority must hold a hearing to determine the application, unless a hearing is not required. Therefore, no alternative options are considered or recommended.

5 Background information

- 5.1 This report concerns an application made under section 159 of the Gambling Act 2005 (the Act).
- 5.2 An application for a premises licence may only be made by a person who:
- Holds an operating licence which authorises him to carry on the activity in respect of which the premises licence is sought and
 - Who has a right to occupy the premises to which the application relates.
- 5.3 An Adult gaming centres are entitled to make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines which are available for use on the premises and any number of category C or D machines. Where a premises licence was granted before 13 July 2011, they are entitled to make available four category B gaming machines, or 20 percent of the total number of gaming machines, whichever is the greater. Category B machines at adult gaming centres are restricted to sub-category B3 and B4 machines, but not B3A machines.
- 5.4 Attached at **Appendix 3** is the Summary of Machine Provisions by premises.
- 5.5 Attached at **Appendix 3** is Part 9 from the Gambling Commission Guidance to Local Authorities which concerns Premises Licence conditions.
- 5.6 Attached at Appendix 4 is Part 21 from the Gambling Commission Guidance to Local Authorities which concerns Adult Gaming Centres and this also

includes the Mandatory conditions that would automatically be attached to an Adult Gaming Centre Premises Licence, if granted. Some types of gambling premises licence also have default conditions attached to them but there are currently no default conditions specific to Adult Gaming Centres.

- 5.7 Attached at **Appendix 4** is a copy of the Council's Statement of Gambling Policy and the Local Area Profile which is made reference to by the applicant in their risk assessment.

6. Relevant representations

- 6.1 A responsible authority (the Licensing Authority) & interested parties have made representations on this application and copies are attached at **Appendix 2**.
- 6.2 An interested party is defined in the Gambling Act 2005 as someone who –
- lives sufficiently close to the premises to be likely to be affected by the authorised activities
 - has business interests that might be affected by the authorised activities
 - represents persons in either of these two groups.
- 6.3 The applicant has been provided with a copy of the representations made and both the applicant and those making representations have been made aware of the date, time and details of joining the Sub Committee hearing.

7 Legal implications

- 7.1 The Section 153 of the Gambling Act 2005, provides that in determining applications the licensing authority shall aim to permit the use of the premises for gambling in so far as it thinks 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 licensing 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)).
- 7.2 A copy of the Gambling Commission's sector specific Conditions and Codes of Practice applicable to Adult Gaming Centres can be seen at **Appendix 3**.
- 7.3 The latest version of the Gambling Commission's Guidance to Licensing Authorities is available on line at :- [Guidance to licensing authorities - Part 21: Adult gaming centres](#)
- Parts 1 (General), 9 (Premises licence conditions) and 21 (Adult Gaming Centres) are relevant to this application.
- 7.4 A copy of the Council's Statement of Gambling Policy, published in accordance with section 349 of the Gambling Act 2005 can be seen at **Appendix 4**

8 Determination

8.1 The decision will take effect once the period for any appeal has elapsed, unless the Sub-Committee determines its decision is to have immediate effect.

9 Equalities Impact

9.1 The arrangements for the Licensing Hearings seek to ensure that all applicants and other interested parties receive a fair hearing and that the process is accessible to all groups within the community.

10 Human Rights

10.1 The Human Rights 1998 (HRA) requires public bodies to ensure everything they do is compatible with Convention Rights and makes it unlawful for a public authority to act incompatibly with those Rights. **Article 6 (A6)** of the European Convention on Human Rights (ECHR) is the right to a fair trial.

CONTACT OFFICER: Daliah Barrett , Licensing Team Leader .

Appendices:

App 1 Application Forms & risk assesment

App 2 Relevant representations

Background Documents

App 3 Guidance from the Gambling Commission - AGC [Guidance to licensing authorities - Part 21: Adult gaming centres](https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities/gla-part-21-adult-gaming-centres)

<https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities/gla-part-16-gaming-machines>

<https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities/gla-part-7-premises-licences>

<https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities/gla-part-9-premises-licence-conditions>

App 4 Council's Statement of Gambling Policy & Local risk assessment

[Statement of gambling policy | Haringey Council](#)

Appendix 1

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Application to vary a premises licence under the Gambling Act 2005

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Part 1 - Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A

Individual applicant

1 Title: Mr ☐ Mrs ☐ Miss ☐ Ms ☐ Dr ☐ Other (please specify) [*****]

2 Surname: [*****] Other name(s): [*****]

3 Applicant's address (home or business -):

[*****]

[*****]

[*****]

Postcode: [*****]

4(a) The number of the applicant's operating licence (as set out in the operating licence): [*****]

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: [*****]

5 Tick the box if the application is being made by more than one person. ☐

Section B

Application on behalf of an organisation

6 Name of applicant business or organisation: Chongie Entertainment UK Limited

- 7 The applicant's registered or principal address:
- 3-5 Wardour St, London
- Postcode: W1D 6PB
- 8(a) The number of the applicant's operating licence (as given in the operating licence): 062728-N-337784-002
- 8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: [*****]
- 9 Tick the box if the application is being made by more than one organisation. ☐

Part 2 - Premises Details

- 10 Trading name used at licensed premises: Little Vegas
- 11 Give the address of the premises or, if none, give a description of the premises and its location. Where the premises are a vessel, give the place indicated in the premises licence as the place in the licensing authority's area where the vessel is wholly or partly situated. Where possible this should include an address with a postcode:
- 17 High Road
- Wood Green
- Postcode: N22 6BH
- 12 Telephone number at premises (if known): [*****]
- 13 Type of premises licence to be varied:
- | | | |
|---|--|---|
| Regional Casino <input type="checkbox"/> | Large Casino <input type="checkbox"/> | Small Casino <input type="checkbox"/> |
| Converted Casino <input type="checkbox"/> | Bingo <input type="checkbox"/> | Adult Gaming Centre <input checked="" type="checkbox"/> |
| Betting (track) <input type="checkbox"/> | Betting (other) <input type="checkbox"/> | Family Entertainment Centre <input type="checkbox"/> |
- 14 Premises licence number (if known): LN/000024354
- 15 If you are making this application alongside an application for transfer or reinstatement of the premises licence into your name, please give the name of the current licence holder as it appears

on the premises licence (if known):

Surname: [*****] Other name(s): [*****]

Part 3 - Details of variations applied for

16(a) Please give details of any variation which is being applied for. Where the application includes an application to exclude or vary a condition of the premises licence, identify the relevant condition here (unless it relates to hours of operation which are dealt with in questions 16(b) and 16(c)):

To extend the hours of operation to 24 hours with the removal of the restriction on the Premises Licence.

16(b) Do you want the licensing authority to exclude or vary a condition of the licence so that the premises may be used for longer periods than would otherwise be the case?

Yes

16(c) If the answer to question 16(b) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

	Start	Finish	Details of any seasonal variation
Mon	00:00	00:00	[*****]
Tues	00:00	00:00	[*****]
Wed	00:00	00:00	[*****]
Thurs	00:00	00:00	[*****]
Fri	00:00	00:00	[*****]
Sat	00:00	00:00	[*****]
Sun	00:00	00:00	[*****]

17 Please indicate any particular date on which you want the variation to take effect if approved:
ASAP

18 Please set out any other matters which you consider to be relevant to your application:
With the removal of Condition 1 - "Reduced operating hours to ensure the premises operates between 8am and 2am Monday – Sunday including Bank Holidays".

Part 4 - Declarations and Checklist (Please tick as appropriate)

1/ We confirm that, to the best of my/ our knowledge, the information contained in this application is true. 1/ We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.



1/ We confirm that the applicant(s) have the right to occupy the premises.

**Checklist:**

- **Payment of the appropriate fee has been made/is enclosed** ☒
- **A plan of the premises is enclosed** ☒
- **The existing premises licence is enclosed** ☒
- **The existing premises licence is not enclosed, but the application is accompanied by -**
 - **A statement explaining why it is not reasonably practicable to produce the licence and,** ☐
 - **An application under the Section 190 of the Gambling Act 2005 for the issue of a copy of the licence** ☐
- **I/we understand that if the above requirements are not complied with the application may be rejected** ☒
- **I/ we understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities**

**Part 5 - Signatures**

19 Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Woods Whur

Signature:

Print Name: Woods Whur

Date: 11 March 2025 Capacity: Solicitors for the Applicant

20 For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised

agent. If signing on behalf of the applicant, please state in what capacity:

Signature: [*****]

Print Name: [*****]

Date: [*****] (dd/mm/yyyy) Capacity: [*****]

Part 6 - Contact Details

21(a) Please give the name of a person who can be contacted about the application: Amanda Usher

21(b) Please give one or more telephone numbers at which the person identified in question 21 (a) can be contacted: 0113 234 3055

22 Postal address for correspondence associated with this application:

Woods Whur, St James House, 28 Park Place, Leeds

Postcode: LS1 2SP

23 If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:
amanda@woodswhur.co.uk

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Form A

NOTICE OF APPLICATION TO VARY A PREMISES LICENCE

This notice is issued in accordance with regulations made under section 160 of the Gambling Act 2005

Notice is hereby given that Chongie Entertainment UK Limited

of the following address:

3-5 Wardour St, London W1D 6PB

the number of whose operating licence is 000-062728-N-337784-002 has made an application for the variation of a premises licence for the following type: Adult Gaming Centre Premises Licence.

The application relates to the following premises: 17 High Road, Wood Green, N22 6BH.

The proposed variation is pursuant to section 187 of the Gambling Act 2005 to vary the adult gaming centre premises licence to extend the hours of operation to 24 hours with the removal of the restriction on the Premises Licence..

The application has been made to the following licensing authority: London Borough of Haringey, Licensing Team, Level 1 North - River Park House, 225 High Road, London

Postcode N22 8HQ

Website <https://www.haringey.gov.uk/>

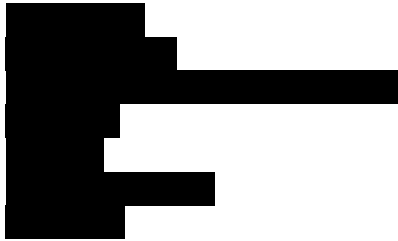
Information about the application is available from the licensing authority, including the arrangements for viewing the details of the application.

The following person connected with the applicant is able to give further information about the application: Amanda Usher, Woods Whur, St James House, 28 Park Place, Leeds LS1 2SP (amanda@woodswhur.co.uk)

Any representations under section 161 of the Gambling Act 2005 must be made no later than the following date: 7 April 2025

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26 October 2023



**TOWN AND COUNTRY PLANNING ACT 1990
TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(ENGLAND) ORDER 2015
NOTICE OF PLANNING PERMISSION**

Case Reference HGY/2023/1953
Location 17 High Road, Wood Green, London, N22 6BH
Proposal Variation of condition 3 (opening hours) of planning permission
ref. HGY/2020/2996 for Change of use from betting shop (Sui
Generis) to adult gaming centre (Sui Generis), namely to amend
the opening hours from 8:00-23:00 to 8:00-2:00 Monday to
Sunday and Bank Holidays
Received 19 July 2023

In pursuance of their powers under the above Act, the London Borough of Haringey as Local
Planning Authority hereby PERMIT the above development received on the above date.

Title	Description	Date
1.1250 Location Plan at 17 High Road Wood Green.pdf	The location plan	19 July 2023
20453.NIA-RPT.01 Rev A.pdf	Noise impact assessment	19 July 2023


Robbie McNaugher
Head of Development Management and Planning Enforcement
Planning Service

Conditions: (6)

- 1 The development hereby permitted shall be begun not later than the expiration of 22 January 2024.

Reason: To ensure the commencement timescale for the development is not extended beyond that of the original planning permission granted on 22 January 2021 Haringey ref: HGY/2020/2996.

- 2 The development hereby permitted shall be carried out in complete accordance with the plans and drawings approved under application ref. HGY/2020/2996, other than where those details are altered pursuant to the conditions of this planning permission.

Reason: For the avoidance of doubt and in the interests of proper planning.

- 3 This permission shall be for a limited period of 3 years from the date of this decision expiring on 26th October, 2026 when the hours of operation hereby approved shall be discontinued and the former hours reinstated.

Reason: In order to enable the Local Planning Authority to review and assess impact on neighbouring amenity of the use following reasonable period of time.

- 4 The use hereby permitted shall not be operated before 08:00 hours or after 02:00 hours Monday to Sunday and Bank Holidays.

Reason: This permission is given to facilitate the beneficial use of the premises whilst ensuring that the amenities of adjacent residential properties are not diminished consistent with Policy DM1 of The Development Management DPD 2017.

- 5 At no time shall any amplified speech or music generated from the site be audible within the adjoining residential premises.

Reason: To prevent loss of amenity to neighbouring residential premises due to noise generated from the premises in accordance with Policy DM1 of The Development Management DPD 2017.

- 6 The development shall be carried out in accordance with the details of Secured by Design measures and window display approved under application reference: HGY/2021/3006, and shall be maintained thereafter.

Reason: To ensure safe and secure development and reduce crime and to avoid a 'dead' frontage within the Primary Shopping Frontage in line with Policy DM42.

- 1 You can find advice in regard to your rights of appeal at:
www.planningportal.gov.uk/planning/appeals/guidance/guidancecontent
- 2 This notice relates solely to a planning decision and does not purport to convey any approval or consent which may be required under the Building Regulations or any other statutory purpose.
If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning Inspectorate (inquiryappeals@planninginspectorate.gov.uk) at least 10 days before submitting the appeal.
- 3 For more information about making a Building Regulations application, please contact Haringey Council Building Control Team by email building.control@haringey.gov.uk, telephone 020 8489 5504, or see our website at www.haringey.gov.uk/buildingcontrol.

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Premises

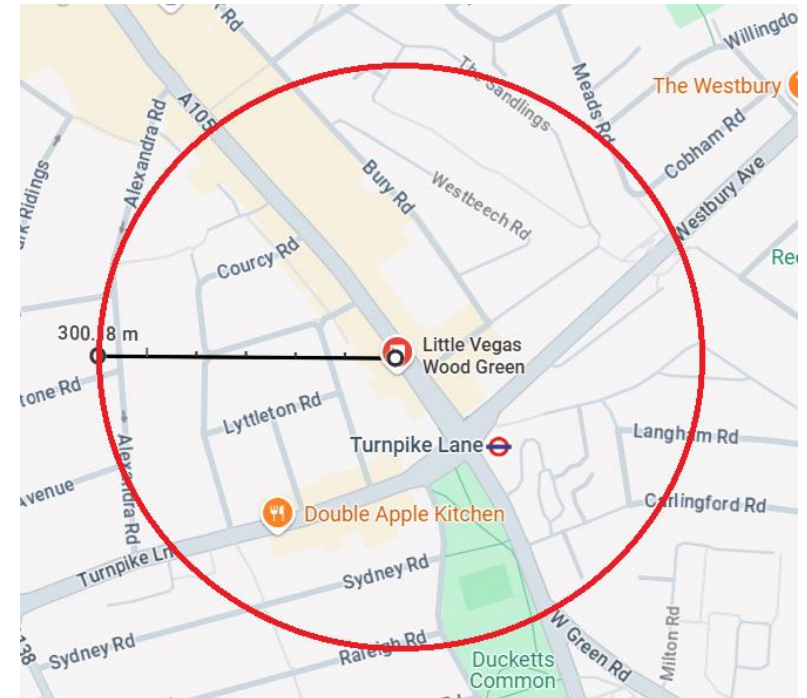
Premises Name (TA)	Little Vegas
Premises Address	17 High Road, Wood Green
Premises Post Code	N22 6BH
Premises License Number	LN/000024354
Category of Premises	Adult Gaming Centre (AGC)

Company

Operating Company	Chongie Entertainment UK Ltd
Company Address	3-5 Wardour St, London, W1D 6PB
Operating License Number	062728-N-337784-003

Assessment Writer

Creator of Assessment	Darren Hughes
Position Held in Company	Director or People Strategy (PML holder for Regulatory Compliance)
Date LARA Version Created	5 th March 2025
Dates Lara Reviewed	



Requirement to Comply

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences

Social responsibility code provision 10.1.1

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at **each of their premises**, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.
2. Licensees must review (and update as necessary) their local risk assessments.
 - a. To take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b. When there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c. When applying for a variation of a premises licence; and
 - d. In any case, undertake a local risk assessment when applying for a new premises licence. **Ordinary code provision**

10.1.2

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

Purpose

The purpose of this document is to assist staff in understanding and carrying out their responsibilities in running the premises including alerting them to any special problems of which they need to be aware in carrying out their duties, for example awareness of potentially vulnerable individuals in the vicinity.

The Operator

Chongie Entertainment UK Limited is licensed by the Gambling Commission. It is familiar with the guidance and information contained in the Borough of Haringey's Statement of Gambling Policy (2025-2028)

The venue has a Smart Tablet which it uses to record Customer interactions, Incidents and age verification challenges. This data is analysed at Head Office and used in the review of the Local Area Risk Assessment, to highlight any emerging trends or increased risks. For example, in the previous 12 months there have been 459 Age verification challenges within the industry standard Think 25 scheme – 348 of these were able to provide valid ID, whilst 101 could not provide valid ID with proof of age and were asked to leave; 10 under 18s accompanied by an adult were also refused entry.

Wood Green

Wood Green is a vibrant area in the London Borough of Haringey, located in north London. It is a key commercial and residential hub, well-connected by transport links, including the Piccadilly Line, providing easy access to central London and Heathrow Airport.

The area is known for its bustling high street and The Mall shopping centre, a major shopping destination with a variety of retail, dining, and entertainment options.

According to the 2021 Census, Haringey has a population of approximately 263,000, with Wood Green being one of its most diverse and dynamic neighbourhoods. The area continues to evolve, with regeneration projects enhancing its appeal as a cultural and commercial destination in north London.

The Local Area

Little Vegas is located on the southern side of High Road near Turnpike lane station. High Road is a major commercial street running through the heart of Wood Green, extending in a north-south direction with a span of roughly 1 km.

The surrounding area features a variety of businesses, including restaurants, cafes, convenience stores, and retail shops. There are also several entertainment and hospitality venues, as well as professional service providers, contributing to the diverse character of the location.

Wood Green benefits from excellent public transport links. With Turnpike Lane Underground Station, a short walk from the site, provides access to the Piccadilly Line, connecting to central London and beyond. Numerous bus routes operate along High Road, offering frequent services to surrounding areas.

The premises themselves are rectangular in shape with an enclosed lobby area and will operate gaming machines on the ground floor along with a disabled toilet and office.

No auxiliary activities will be offered other than Category B3, B4, Category C and Category D gaming machines.

Wood Green Specific LARA consideration

After conducting thorough research and considering advice from relevant source materials, we have decided to maintain the standard 300-meter radius surrounding the venue. However, given the substantial size and diverse range of businesses along High Road, we have also included locations further away that remain situated on High Road itself. This approach ensures a comprehensive representation of the surrounding community and allows this Local Area Risk Assessment to provide all pertinent and relevant information.

Gambling Premises:**LBO's**

- Ladbrokes - 13 High Road
- Paddy Power - 33 High Road
- Betfred - 64 High Road
- Betfred – 679 Green Lanes,
- William Hill – The Broadway, High Road
- Ladbrokes – 12 The Broadway, High Road
- Paddy Power – Unit 4, Hollywood Green, 180 High Road
- Ladbrokes – 742, 744 Lordship Ln

Adult Gaming Centres & “High Street Bingo”

- Admiral – 9 High Road
- Palace Amusements - 49 High Road
- Merkur slots – 91 High Road
- Admiral – 117 High Street
- Little Vegas – 144 High Road

Bingo

There are no Bingo Halls located within the search parameters, it has been noted Mecca Bingo closed its premises at 707 -725 Lordship lane in June 2024.

Casinos

There are no Casinos located within the locality and it is also noted of the details of the “policy not to permit casinos” in Haringey Statement of Gambling Policy 2025-2028

Pawnbrokers

- H&T Pawnbrokers - 12 Cheapside High Road
- Pickwick Jewellers and Pawnbrokers - 123 High Road

A number of additional locations identified have been listed due to clear advertisement for the immediate purchase of technological hardware (phones, laptops etc)

- CEX – 5 Cheapside High Road
- MCX – 37 High Road
- Zee Mobile Exchange – 95 High Road
- AR Phones - 83 High Road
- Hot Spot Mobile – 70 High Rd

Public Houses & Licensed Premises for the Primary sale of Alcohol.

There are a number of pubs and licensed premises within the local area:

- The Toll Gate - 26-30 Turnpike Lane
- Jani – 31 Westbury Avenue
- Spouters Corner – 180 High Road

- The Nag's Head – 203 High Road
- PJ O'connors Irish Sport Bar, 239 High Road
- Ludo's – Blue House Yard, 5 River Park Road
- Rattle n Hum – 232 High Road

There are also a number of off licenses and restaurants licenced for the sale of alcohol in the vicinity.

It is illegal to consume alcohol on Adult Gaming Centre premises and Chongie Entertainment UK will not allow access to anyone appearing to be under the influence of alcohol.

Banks & ATM machines

- Nationwide Building Society - 25 High Road
- Santander - 28 High Road
- Barclays Bank - 62 High Road
- Halifax – 7 Cheapside High Road
- Metro Bank – 136A High Road
- Lloyds Bank – 149-153 High Road
- NatWest – 14 The Broadway
- TSB Bank POD Location, The Mall
- The Co-operative Bank – 195 High Road

- Tesco Bank (ATM) - Tesco Express, 1-3 High Road
- Sainsbury's Bank (ATM) - 26 High Road

- Sainsbury's Bank (ATM) – Unit 4, Hollywood Green, 180 High Road
- Post Office (ATM) - 105 Turnpike Lane

It is also noted in this risk assessment there is an unbranded largely advertised ATM location next to Sports Direct at Unit 44, Wood Green Shopping City. In addition, it was also noted that a number of the AGC premises have ATM functions available inside.

Schools/Educational Establishments:

There are a number of schools, nurseries and other educational facilities around the area of the AGC site. This list notes a number of them, but is not exhaustive. The list factors locations outside of the 300m radius to factor reasonable commutable distances.

- Belmont Junior School – 30 Rusper Road N22 6RA
- Lordship Lane Primary School – Ellenborough Road, N22 5PS
- Park View School – Wood Green Road, N15 3QR
- Alexandra Primary School – School Caretaker, Western Road, N22 6UH
- Greig City Academy – High St, N8 7NU
- North Harringay Primary School – Falkland Road, N8 0NU
- Rokesly School – Rokesly Ave, N8 8NH
- Chestnuts Primary School – La Rose Ln, N15 3AS
- St Paul's Catholic Primary School – Bradley Road N22 7SZ
- Wood Green Central Library, N22 6XD (First Class Learning)
- The Grove School – Downhills Road, N17 6AR
- Noel Park Primary School – Gladstone Ave, Noel Park, N22 6L
- St Jonh Vianney Primary School – Stanley Road, N15 3HB
- Belmont Junior School – 30 Rusper Road N22 6RA

It is not unusual to see college and school children in High Road and the Mall shopping centre after school hours and using the nearby bus / train links. The risk of these children entering the licensed premises or gambling is mitigated by the processes outlined in our Risk Matrix.

Churches/meeting places for vulnerable people.

At the time of this Assessment the following premises were noted as being in close proximity to the AGC site. The list is not exhaustive:

- UCKG Help Centre - 51A High Road
- St Michael's Church – Bounds Green Road
- Cathedral of the Dormition of the Moher of God – 22 Trinity Road
- St Paul the Apostle RC Church – 22 Bradley Road (CARIS, Homeless support)
- Jubilee Church – The Mall, Cineworld Cinema
- Wood Green Faith Mosque – 1D Caxton Road
- Taiba Community Centre – 30 Willoughby Road
- Grace Baptist Church Support – 48-50 Park Riding
- The Community Hub – 8 Caxton Road
- Church Hall 60-62 Alexandra Road (Alcoholics Anonymous)
- Salvation army, 24 Lymington Avenue

It is noted by this report that Gamblers Anonymous do not meet within the Wood Green area, the nearest in person session can be found in North Finchley.

Risks to the Vulnerable

All the above establishments (banks & ATM's, pubs and bars, betting shops, pawnbrokers, AGC & Bingo premises, churches, advice centres, centres for the homeless) might potentially have links to people who are vulnerable from gambling related harm such as establishments which provide gambling services, to source of funds to gamble such as ATM's. Pubs and bars create a risk of customers becoming inebriated and therefore potentially not in control of their gambling. Pubs may also offer the ability to play gaming machines.

Churches and advice centres might offer meetings or advice to those who may have potential issues with their gambling. Centres for the homeless will likely attract those that are potentially vulnerable and at risk.

Chongie Entertainment UK Ltd are aware that there are risks posed from gambling related harm and to the vulnerable. However, these risks will be mitigated and reduced by the company's excellent levels of staff training and the procedures identified in the Risk Matrix.

CCTV Systems

A CCTV system of a standard required by the police and/or the premises license will be installed on the site with cameras covering all public areas (excluding toilets). The required customer signage will be in place. The CCTV system will also have the capacity to be viewed remotely by Senior Management.

An external CCTV camera will also be installed, subject to Data Protection requirements, to monitor activity directly outside the premises.

Door Control

Chongie Entertainment UK realise that management of door control is an important consideration. Decisions relating to the levels of staff and any potential night security required are detailed below:

- Possible external CCTV coverage
- Potential night time Mag lock controls
- SIA registered Night Security will be considered if required via ongoing Risk Assessment

Toilet Facilities

The toilet facilities will be designed to deter individuals from attempting to inject drugs on the premises. Controls in place will be:

- Access controlled by staff.
- Toilets inspected after every use where any suspicion arises, to identify individuals potentially involved in drug use.
- Zero tolerance to drug or alcohol abuse with appropriate signage.

We believe this Local Area Risk Assessment (and future updates) identifies all necessary steps required in both complying with the Borough of Haringey's Statement of Gambling Policy (2025-2028), upholding the Licence Conditions and Codes of Practice and promoting the 3 Licensing Objectives. The Risk Matrix details how we as the operator, deal with key points identified.




Gambling Act 2005 – The Licensing Objectives



The Gambling Act 2005 sets out the three licensing objectives (LO), which are:



- (A) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- (B) Ensuring that gambling is conducted in a fair and open way; and
- (C) Protecting children and other vulnerable people from being harmed or exploited by gambling.

Risk Assessment Matrix

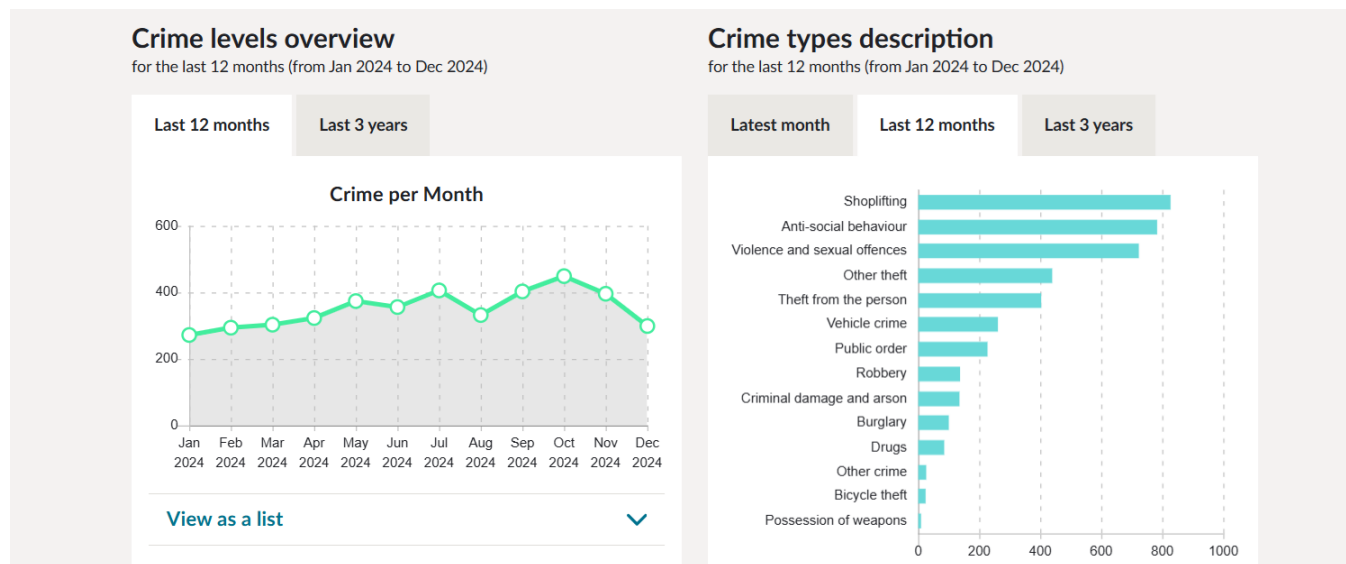
A) Preventing Gambling from Being a Source of Crime or Disorder

	Risk Reduced by measures in place
	Risk remained at same level
	Risk increased by measures in place

Risk Assessed	Level of Risk	Impact	Risk Management Measures	New Level of Risk	Change
Failure to identify attempts to launder money on the premises (e.g. dye stained notes) and to follow correct reporting procedure.	Moderate	Severe to business	<ul style="list-style-type: none"> Pay station and note acceptors regularly inspected and updated to the latest security and detection software available. All machines have a maximum collection limit with the highest amount possible being £1500 on B3 machines, which then require staff intervention and authorisation to process. Weekly collection process in place with cash (notes & coins) identified to each machine present. Staff regularly trained on AML importance, reporting process and potential signs of abuse. Fully compliant with LCCP requirements. Particular the reporting procedure to NCA by way of SARs. AML warnings built into Tito systems. TITO tickets cannot be transferred or used in other premises. Any AML suspicious activity to be immediately reported to the MLRO, then also logged on the SmartHub tablet. 	Low	
Poor security increasing vulnerability to crime.	Low	Severe to business	<ul style="list-style-type: none"> Staff provided with personal alarms. 3rd Party monitoring in place, where they have the ability once notified from the personal alarm, to contact the police without further staff engagement. All senior team have remote CCTV access Intruder alarm installed and regularly serviced Effective CCTV coverage with data stored for 31 days. Mag-lock entrance to be used between 23:00 – 2am as required on the premises licence. Regular liaison with local law enforcement agencies. Subscribe to BACTA's crime bulletins. 	Low	




Awareness of heightened local crime in the area	Low	Severe to business	<ul style="list-style-type: none"> 4k High Resolution CCTV cameras present at the front and back of the building (as appropriate) to monitor external factors. Regular reviews of Police Crime Stats for local area along with proactive engagement to local schemes that may be on offer. Proactive engagement with local town officials and police for known issues or individuals of concern. 	Low	
Issues arising from Proceeds of Crime failings	Moderate	Severe to business	<ul style="list-style-type: none"> Staff trained at induction and regular intervals to understand all relevant aspects of POCA (Proceeds of Crime Act) along with examples of incidents they could be witness too, that would arouse suspicion and in turn inform senior management about. The business has a zero tolerance approach to any type of criminality with even reasonable suspicion resulting in a ban from all relevant premises. These individuals photos are stored in the Banned Customer Log at the service desk and reviewed at the start of each shift to ensure compliance. 	Low	




Local Crime Data (Police.UK Statistical Data)



Risk Assessment Matrix




B) Ensuring Gambling is Fair and Open



	Risk Reduced by measures in place
	Risk remained at same level
	Risk increased by measures in place

Risk Assessed	Level of Risk	Impact	Risk Management Measures	New Level of Risk	Change
. Failure to provide or manage the complaints procedure correctly (Gambling related complaints)	Moderate	Severe to business Severe to Individual	<ul style="list-style-type: none"> Clear and present complaints form and procedure available both on the shop floor, for all customers to read but also kept in the compliance folder which staff read and sign as part of their training. On the entrance notice board a clear sign is displayed with our complaints number should this be required for any customer or member of the public. The procedure ensures clear and direct communication with all rights regarding ADR and reasonable support for gambling prevention highlighted to the individual on first written correspondence as well as in person if complaint taken verbally. Our complaints policy is regularly reviewed and updated where required by the senior team and 3rd party gambling solicitors. 	Low	
Failure to provide clear or correct terms and conditions	Low	Severe to business Moderate to Individual	<ul style="list-style-type: none"> General terms and conditions, as well as specific terms and conditions for individual promotional activity, are available for all customers on the shop floor. These are checked on a regular basis by venue management and members of the senior team. Our terms and conditions are regularly reviewed by the senior teams and relevant PML holders but also externally verified by 3rd party gambling solicitors. 	Low	
Opportunity for incorrect or misleading marketing materials	Moderate	Severe to business Moderate to Individual	<ul style="list-style-type: none"> Marketing for the business is strictly controlled and only authorised by a PML holder, Venue teams including venue management are not permitted to create, change or amend any promotional material. 	Low	


Risk Assessment Matrix

C) Protecting Children and the Vulnerable

	Risk Reduced by measures in place
	Risk remained at same level
	Risk increased by measures in place

Risk Assessed	Level of Risk	Impact	Risk Management Measures	New Level of Risk	Change
Children entering site unnoticed or unchallenged.	Moderate	Severe to business Severe to child	<ul style="list-style-type: none"> Venue designed to ensure no aspects of shop front or exterior appeal to children or youth culture Exterior signage present from the street displaying think 25 and no under 18's notices Constant & effective monitoring of entrance by venue staff CCTV in place throughout venue with clear camera angles of exterior and internal entrance points. An additional CCTV monitor is located at the entrance, displaying the extensive CCTV coverage of the venue system. Staff are trained to ensure entrance is constantly monitored at all times with clear sight lines from service station to entrance/lobby Staff are trained via E-learning, in person training session and 6 monthly refreshers for all venue staff on all compliance matters. Venues are also regularly visited by Area Managers and Members of the HQ/Senior Team for training assessment and performance reviews. 	Low	
Potentially vulnerable people being able to gamble.	High	Severe to business Severe to Individual	<ul style="list-style-type: none"> Staff constantly circulating on the shop floor and always 1 person monitoring the entrance in order to interact with all customers at the point of entry. Customer interaction policy and procedures are in place to identify signs of potential vulnerability which is completed during induction and at regular intervals. 	Moderate	

			<ul style="list-style-type: none"> All customer interactions recorded in the Interactions log within the SmartHub, which details the action(s) taken. This also assists in attempting to identify repeat attempts. SmartHub, Staff training and staff development reviewed on a regular basis by the Venue Manager, the Compliance Dept and Operations Management. Staff constantly circulating on the shop floor and always 1 person monitoring the entrance in order to interact with all customers at the point of entry. 		
Failure to recognise signs associated with problem gambling or substantial changes in gambling style.	High	Severe to business Severe to Individual	<ul style="list-style-type: none"> Player positions effectively monitored by the staff along with a Players behaviour for any signs of distress. Physical financial transactions are also monitored by staff members i.e. consistent trips to the ATM or erratic financial behaviour. Staff are trained upon induction and at regular intervals throughout their employment following the interact, identify, evaluate framework. Customer interaction logs are reviewed by the venue manager and a member of the senior team, this forms a full feedback and accountability chain through the business to enhance training and feedback to venue staff. High resolution CCTV cameras allow for remote viewing or historical review for training purposes. Internal audits of adherence to policy and procedures are conducted by the PML holder for regulatory compliance along with 3rd party checks by a gambling solicitor. 	Moderate	↓
Failure to provide information to players on responsible gambling.	Moderate	Severe to business Severe to Individual	<ul style="list-style-type: none"> Stay in Control posters displayed prominently Sufficient quantity of Stay in Control leaflets available in racks and discretely located in the toilet area for people to view or take privately. Machine labelling displaying National Gambling Helpline Staff regularly trained and assessed to ensure full Compliance to GC guidelines and Licence Conditions & Codes of Practice (LCCP) Staff also trained on using material as part of the customer interaction process where required. 	Low	↓

Failure to properly administer the self-exclusion process and maintain its effectiveness thereafter, including breaches and reinstatements.	High		<ul style="list-style-type: none"> • Staff trained upon induction and at regular intervals to be aware of the right of immediate self exclusion and the processes involved. • Clear self exclusions policies and are consistently reviewed and trained out to the business accordingly. • Once an exclusion has been generated either by us or a qualifying business as part of the Multi Operator Self Exclusion Scheme M.O.S.E.S) these people are then reviewed at the beginning of every shift by every staff member in the Venue. • Internal audit process to ensure full adherence to Gambling Commission policy, process and understanding. • All data subject to regular review and as part of the quarterly review returns process. • Staff trained to understand and to have the ability to inform the individual regarding re-instatement requirements and 24 hour cooling off period. 	Moderate	
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GAMBLING PREMISES LICENCE

This licence is issued under section 164 of the Gambling Act 2005 by

ADULT GAMING CENTRE PREMISES LICENCE**Haringey Council Licensing Authority**

Premises Licence Number:

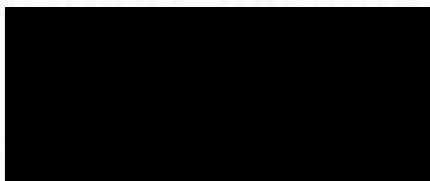
LN/000024354

Commencement Date:

4th June 2021

Transfer: 1st April 2024

Signature:..

**Part 1 – Details of person to whom licence is issued**

This premises licence is issued to:

Chongie Entertainment UK Limited

of the following address:

**3-5 Wardour Street
London
W1D 6PB**

Part 2 – Details of the premises in respect of which the licence is issued

Facilities for gambling may be provided in accordance with this licence on the following premises:

**Little Vegas
17 High Road
Wood Green
London N22 6BH**

Part 3 – Premises Licence Details

This licence commenced on:

4th June 2021


This licence is of unlimited duration:

N/A

General

1. Reduced operating hours to ensure the premises operates between 8am and 2am Monday – Sunday including Bank Holidays.
2. Staff must have access to a clear CCTV facial recording images of anyone seeking to enter the venue by way of a monitor system. This will help to manage the amount of people inside and prevent banned users from entering.

CCTV

3. A comprehensive CCTV system shall be installed and maintained on the premises as required by the Metropolitan Police Licensing Team. CCTV should cover the following:
 - All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions
 - The areas of the premises to which the public have access (excluding toilets)
 -  counter area
4. The CCTV system shall be operational 24 hours a day for 31 days.
5. CCTV shall be available for the police viewing at any time with minimum delay.
6. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.
7. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering exiting the premises.

Children and Young People

8. The Licensee shall maintain a bound and paginated 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.
9. Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.
10. Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.
11. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.

Entrances and Doors

12. A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable from the ground floor cashier counter by staff.
13. Access control on the main entrance door set must be operational between 23:00 - 02:00 Monday to Sunday, so that all customers have to be granted access by staff.

Staffing levels

14. There shall be 2 members on duty between the hours of 12:00 and 02:00 with no pre-planned single staffing at any other time

Identification of Offenders or Problem Persons

15. The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.
16. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.

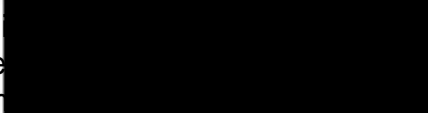
Seating

17. The licensee shall ensure that all seating within the premises are either secured to the floor or are weighted to prevent lifting.

Alarms

18. The licensee shall install and maintain an intruder alarm on the premises.
19. The premises shall install and maintain a panic button behind the cashiers counter.

Toilets

20. The licensee shall ensure that all public toilets are checked every hour for evidence of drug use. Checks are to be documented stating the time and name of the licensee. 

Signage, Promotional Material and Notices

21. Prominent GamCare documentation will be displayed at the premises.

Staff Training

22. The licensee shall: provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme. periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives. Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.
23. The Licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in this training shall be formally recorded and the records produced to the police or licensing authority upon request.
24. New and seasonal staff must attend induction training and receive refresher training every six months.

Homeless and Street Drinking

25. The Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.
26. The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.
27. No alcohol shall be consumed on the premises at any time.


Recording of Incidents and Visits

28. An incident log shall be kept for the premises and made available on request to an authorised officer of the City Council or the Police which will record the following;

- a) All crimes reported to the venue;
- b) Any complaints received regarding crime and disorder;
- c) Any incidents of disorder;
- d) Any faults in the CCTV system; and
- e) Any visit by a relevant authority or emergency service.

ATMs

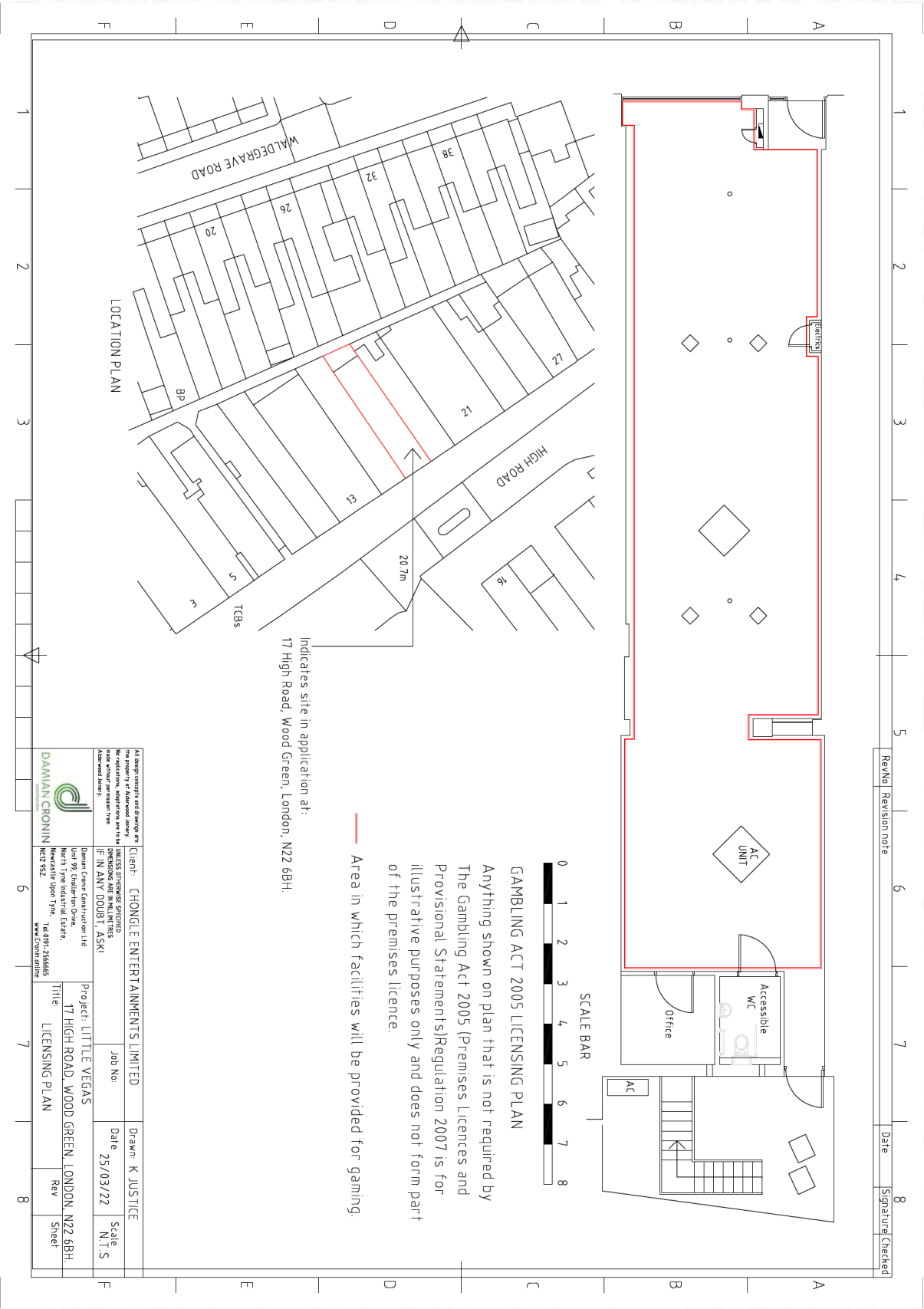
29. There shall be no cash point or ATM facilities on the premises

30. There will be advertising of our local gambling harms service on leaflet and as part of staff training and all new staff need to be made aware of local and national services and actively support the referral of those at risk or showing signs of gambling harms. A log will be kept of referrals for inspection by the local 

The following conditions, which would otherwise attach to the licence by virtue of regulations made under section 168 of the Gambling Act 2005, have been excluded by the issuing authority under section 169(1)(b) of that Act:

N/A

A scale plan is attached as an annex to this licence



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Appendix 2

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Appeal Decision

Site visit made on 19 January 2023

by Chris Baxter BA (Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 10th March 2023

Appeal Ref: APP/Y5420/W/22/3304481

17 High Road, Wood Green, London N22 6BH

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission under section 73 of the Town and Country Planning Act 1990 for the development of land without complying with conditions subject to which a previous planning permission was granted.
 - The appeal is made by Chongie Entertainment Ltd against the decision of London Borough of Haringey.
 - The application Ref HGY/2022/0520, dated 21 January 2022, was refused by notice dated 22 March 2022.
 - The application sought planning permission for change of use from betting shop (Sui Generis) to adult gaming centre (Sui Generis) without complying with a condition attached to planning permission Ref HGY/2020/2996, dated 22 January 2021.
 - The condition in dispute is No 3 which states that:
"The use hereby permitted shall not be operated before 08:00 hours or after 23:00 hours Monday to Sunday and Bank Holidays".
 - The reason given for the condition is:
"This permission is given to facilitate the beneficial use of the premises whilst ensuring that the amenities of adjacent residential properties are not diminished consistent with Policy DM1 of The Development Management DPD 2017".
-

Decision

1. The appeal is dismissed.

Background and Main Issues

2. Following the approval of application HGY/2020/2996 the appeal site can currently operate between 08.00 hours and 23.00 hours Monday to Sunday and on Bank Holidays. The appeal seeks permission to remove condition 3 of permission HGY/2020/2996 allowing for 24 hour opening.
3. The main issues are the effect of the proposal on (i) the living conditions of occupiers of neighbouring properties with respect of noise; and (ii) the character and function of the area.

Reasons

Living conditions

4. The appeal site sits within a shopping area with commercial uses at ground floor level. There is residential accommodation, primarily at first floor level, within close proximity to the appeal site.
5. The proposal would result in an increase of comings and goings to the appeal premises into the evening and early morning. This could result in disturbance

- to neighbouring occupiers from customers talking whilst outside the appeal premises and also noise from customer vehicles including opening and shutting of doors and vehicle engines. Customer movements during hours when noise levels are usually low would be prominent and much more noticeable which would result in occupiers of surrounding properties being unduly disturbed.
6. Sound power levels for human speech have been provided as well as results from a survey undertaken providing data on representative background noise levels and average ambient noise levels for daytime and night-time. Whilst this data infers that two persons speaking would not be above the night-time background or average ambient noise levels, this data does not include noise levels of multiple people talking outside of the premises nor does it include other associated noises such as customer vehicles. There is insufficient evidence to confirm that customers would not arrive or leave the premises in groups of more than two people.
 7. Whilst residents living within a commercial area may not expect a level of noise and activity in the evening to be similar to that of a residential area. Residents nevertheless should still not expect to have their living conditions unduly compromised. Due to additional customer movements in the evening and early morning, and the proximity to residential accommodation, the proposal would create noise levels that would disturb and have an adverse effect on the living conditions of neighbouring occupiers.
 8. The premises is different to a bar, public house or a club, there would be signage requesting customers be respectful when leaving the premises and staff would be trained to ensure customers are quiet when leaving the premises and not to congregate, including the use of an Operational Management Plan and Operations Manual as well as compliance with Responsible Gaming Code. These matters, however, do not outweigh the harm identified above, particularly as it would be difficult for staff to enforce behaviour of customers once they have left the premises.
 9. The appellant explains that there are other evening uses within Wood Green including 24 hour uses and other Adult Gaming Centres (AGCs) as well as reference to other AGCs that the appellant operates. Insufficient evidence has been provided on these other uses and establishments and I do not consider them to be directly comparable to the appeal scheme particularly with regards to proximity to residential uses, operating hours and noise levels.
 10. The existing occupants of the residential unit directly above have indicated that they have not experienced any negative effects in terms of noise. This does not mean that these occupants would not be disturbed by the proposal or that neighbouring occupants would not be disturbed. Noise data has been provided indicating that internal noise levels within the appeal premises would be within an acceptable range and that no sound insulation would be required. I have also had regard to evidence submitted relating to the acceptability of plant use, the installation of a lobby area and specialist witness statement. These matters, however, do not alter my findings above with regards to external noise levels.
 11. I have had regard to the appellants statement of case and submitted evidence including reference to planning appeals¹. These appeals are not directly

¹ Planning Inspectorate Reference Numbers: APP/N5090/A/13/2201162 & APP/B6855/A/10/2135314

comparable to the proposal subject of this appeal including in respect of location and use of the premises. In any case, I have determined this appeal on its own merits.

12. The proposal would have a harmful effect on the living conditions of occupiers of neighbouring properties with respect of noise. The proposal would be contrary to Policy SD7 of the London Plan 2021, Policy SP10 of the Haringey's Local Plan Strategic Policies 2017 and Policy DM1 of the Haringey Development Management DPD 2017 which seeks proposals to ensure a high standard of amenity for neighbours and address potential impacts of noise and disturbance.

Character and function

13. The Council's decision notice states that the proposal would have a detrimental impact on the character and function of the area. The use of the premises would not change as a result of the proposal. Therefore, the opening of the premises for 24 hours would not directly adversely affect the character of the area in terms of its primary use at ground floor level of being a commercial shopping function.
14. Concerns are raised that the proposal may result in added pressure for other premises in the area to extend their opening hours. My attention has not been drawn to any other proposals in the area and I have determined this appeal on its own merits.

Other Matters

15. The proposal would create job opportunities that would be an economic benefit. Given the number of jobs proposed to be created I attribute minimal weight to this benefit.
16. The appellant details that the licensing of the premises is separate to planning matters. It is noted that the appellant is required to meet responsibilities and guidance outlined by the Gambling Act 2005 and the Social Responsibility Code provisions of the Gambling Commissions license conditions and code of practice. The appellant also implements an age verification policy to prevent children and young people from entering the premises and operates a Challenge 21/Challenge 25 on its sites.

Conclusion

17. I have found that the proposal would not have an adverse effect on the character and function of the area. However, this and the other matters detailed above would not outweigh the harm I have identified with regards to the living conditions of neighbouring occupiers with regards to noise.
18. The proposal would conflict with the development plan as a whole and there are no other considerations, including the provisions of the National Planning Policy Framework, which outweigh this finding.
19. For the reasons given above, I conclude that the appeal should be dismissed.

Chris Baxter

INSPECTOR

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From: Daliah Barrett <Daliah.Barrett@haringey.gov.uk>
Sent: 26 March 2025 19:18
To: Licensing <Licensing@haringey.gov.uk>
Subject: FW: Licensing Authority Representation - Little Vegas 17 High Road N22

Dear Sirs/Madam,

Licensing Authority Representation

Application for a Premises Licence (Adult Gaming Centre) by Little Vegas, Shop, 17 High Road, Wood Green, London, N22 6BH.

The Council is aware that demand issues cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives can be. As per the Guidance for local authorities, this authority will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder. Haringey is a very diverse borough, both culturally and socio economically and also has areas where levels of crime and disorder and anti social behaviour are more prevalent than in others.

Noel Park ranks 1st amongst all Haringey wards for crime. There were 308 crimes reported here in January 2025 alone

Crime type	Instances
Shoplifting	77
Violence and sexual offences	62
Anti-social behaviour	55
All other crime	114

With an estimated population of 13712, crime rate (crime per 1000 residents) is 264.29, a decrease of 6.82 % compared to previous year. We welcome the decrease but it is coming from a high starting position. The decrease is testimony to the ward priorities listed below being part of targeted and focused working by the police and local authority.

After careful consideration of the application, Haringey Council as Licensing Authority under the Gambling Act 2005 is making a representation against your application for the following reasons:

The Licensing Authority has recognised in its Local Area profile that the Noel Park ward is an area of ongoing concerns with regards to potential harm from gambling related activities.

Preventing gambling from being a source of crime and associated anti-social behaviour. Reported crime in other betting facilities show that there is a likelihood of violence from customers who become aggrieved when losing at the machines. Crime reports show that on some occasions there is a link between violent activity in one premises leading to further crime or anti-social behaviour in the immediate vicinity. There is already a high level of crime in this area being the main town centre in the borough.

Protecting vulnerable persons from being harmed by gambling. Haringey expects high standards of management and protection for those most vulnerable to the effects of a gambling premises in an area with high deprivation levels. Noel Park ward ranks 4th for deprived areas in Haringey.

The applicant must be able to demonstrate who they consider to be vulnerable persons and what detailed protection measures they have in place. Staff and shop customers are vulnerable to the effects of problem gambling. There are reports of instances of violence and verbal abuse reported at gambling premises in the area, which is often directed at staff and other customers. This is particularly concerning given that the applicant is now seeking a 24hour operation.

We are aware of residents being impacted by noise from the premises periodically. Machine and people noise as caused nuisance. Allowing later operating hours will only serve to exacerbate this further.

The granted Planning permission is clear that at no time shall any amplified speech or music generated from the site be audible within the adjoining residential premises.

It should be noted that the ward priorities are:

- Violence - Public space safety in Wood Green High Road
- Robbery - Items of personal property/ phones, wallets
- Drug related ASB - Possession & Dealing

Conclusion

In conclusion, the Licensing Authority recommends that the Licensing Sub Committee when making their decision, have regard to the concerns that a 24hr operation would bring, the likelihood of the premises attracting a clientele of local residents that already experience deprivation, alcohol and drug dependency, high levels of crime and anti-social behaviour. The High Road has its own issues with socially vulnerable people and we do not consider that an increase in hours is particularly beneficial for this location.

The business has also acted on breach of Haringeys Policy in having staff out in the High Road actively handing out promotional leaflets to get people into the premises. Haringey does not allow for promotional activity that can negatively impact on people's lives, this includes, tobacco products, gambling, pay day loans, bad debt risk credit card offers, unhealthy food choices etc.

The potential for noise nuisance to impact on the residential properties later into the night is to be avoided. The business has also made an application for 24hour operation to Planning, this was refused. The subsequent appeal to the Planning Inspectorate was also dismissed due to the potential for late night noise from the operation of the premises impacting the residential properties. A copy of the Planning Inspectors findings is attached.

LB Haringey

Licensing Authority.

From: Jake Wells <

Sent: 15 March 2025 12:12

To: Licensing <Licensing@haringey.gov.uk>

Subject: Objection to Little Vegas' Application for 24-Hour Operation at 17 High Road, Wood Green, N22 6BH

Dear Haringey Council Licensing Committee,

I am writing to formally object to the application by Little Vegas, located at 17 High Road, Wood Green, N22 6BH, to vary its licence for 24-hour operation as an Adult Gaming Centre.

Fixed Odds Betting Terminals (FOBTs), commonly found in such establishments, have been associated with significant social harm. Despite the reduction of the maximum stake to £2 in April 2019, concerns about their addictive nature persist.

The proposed extension to 24-hour operation raises further concerns. Extended hours may exacerbate gambling-related issues, leading to increased financial hardship and social problems within the community. It is important to consider the potential negative impact on vulnerable individuals during late-night hours.

Notably, areas such as Muswell Hill and Highgate do not have such establishments operating around the clock. This absence suggests a community preference for limiting the availability of gambling services, thereby reducing potential harm.

Moreover, the proliferation of gambling establishments in certain areas can lead to clustering, which has been a concern in Haringey. This clustering effect can negatively impact the character of local communities and contribute to social issues.

In light of these concerns, I urge the Licensing Committee to reject Little Vegas' application for 24-hour operation. Prioritising the well-being of our community and mitigating potential gambling-related harm should be our foremost considerations.

Thank you for considering my objection.

Yours sincerely,

Jake Wells

Public Health Objection to Licensing Application

17 High Road, Wood Green, London, N22 6BH

Health in All Policies Team, Public Health

7th April 2025

Summary

This objection to the above licensing application is made on behalf of the Public Health Team for a variation of an Adult Gaming Centre at 17 High Road, Wood Green.

The grounds for objection are its location close to vulnerable areas and concentration of use in an area where the risk of gambling related harm is high.

Vulnerability has increased since the COVID 19 Pandemic and the cost-of-living crisis, which has had a negative impact on employment, residents' income, increasing poverty and debt; this is further compounded by mental health, unemployment, and families under pressure. This has had a direct impact on the residents of Noel Park Ward.

We are concerned the following licensing objectives will not be upheld:

1. The prevention of crime and disorder
2. Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The applicant has not provided a sufficient local area risk assessment and mitigation plans. The effects of the proposed gambling premises should be seen in the wider context of the well-being and overall health of the society, and as such, it is essential to consider the legitimate objectives of licensing. This undermines our preventative efforts to reduce gambling-related harms in the community. It is, therefore, strongly recommended that the Licensing Committee refuse this application.

Comments on the Local Area Risk Assessment (LARA)

The local area risk assessment submitted by the applicant does not provide an accurate assessment of Wood Green. The applicant has not assessed the area within a 400-meter radius, instead limiting the assessment to 300 meters, which does not give a full picture of the surrounding area. We have addressed the same concern in their licensing application on 31st August 2023.

Furthermore, the mitigation plans to support their local area risk assessment is not adequate and the applicant has missed opportunity to demonstrate mitigations of potential risks to the public.

We have noted the purpose of the document places undue focus on staff responsibilities rather than the operator's obligation to conduct a comprehensive local risk assessment. While staff awareness is important, the primary focus of LARA should be on how the organisation identifies and mitigates risks in the surrounding area. The applicant needs to consider the points below. This should be submitted to the licensing committee as some of the points below have been repeated in our response on 31st August 2023.

1. The operator needs to provide the distances between LBO and Little Vegas (Page 5).
2. There is no mention of Rising Green Youth hub or Youth Justice Service in Wood Green (Page 10).
3. Mitigation Plan within their local area risk assessment.
 - a. Poor security increases vulnerability to crime. This should be noted down as a moderate risk. (Severe to business, Moderate severe to community and Moderate severe to individuals). Mitigations are in place only to prevent the organisation harm, but there is no mention about customers and those living/working in the area. (Page 14).
 - b. There is no mention of alerts on machines, breaks and maximum amount of money per session. Staff training should be more specific – is it gambling harm training? Actions when identifying a vulnerable person should also be specified? How is the company mitigating to prevent gambling related harms – is there a policy in place? (Page 17-18).
 - c. Failure to recognise signs associated with gambling related harms – similar to point above. Need to specify on type of training, potentially add a maximum amount you can withdraw from ATM, maximum amount an individual can spend in a session, mandatory breaks, gambling harm training (Page 18).
4. The assessment does not specify the schools that are located with 400meter radius.
5. It should also be noted there are a number of supported living housing/temporary accommodations located near the proposed premises that has not been listed.
6. We noted on page 10, the application mentioned "It is not unusual to see college and school children in High Road and the Mall shopping centre after school hours and using the nearby bus/train links". Because of this reason we need to protect children and vulnerable adults under the licensing objectives.
7. We would like to know from the applicant the number of toilets and whether this is separate from the staff toilet.

8. We would like the applicant to include mental health and first aid training for staff, in their local area risk assessment.

Location

The Public Health team has evaluated the area of which the premises is located. This proposal is at a vulnerable location with three 24-hour adult gaming centres (AGCs) all within a 1-minute walk. There are a further nine gambling premises including another 24-hour AGC on the High Road. The over-concentration of gambling premises has a negative impact on the health and wellbeing of our residents. Furthermore, Noel Park ward is ranked high in all risks associated with gambling-related harm (e.g. poverty, unemployment, mental health) and the vulnerable groups highlighted in this report suggests a strong need to safeguard the area from over-concentration of gambling premises and to help promote a healthy high street and retain a vibrant mix of uses in the town centre.

Three AGCs clustered on Wood Green High Road:

- **Admiral Casino: Wood Green**, 117 High Road, Wood Green, London, N22 6BB (1 min walk) – open 24 hours
- **Admiral Casino: Turnpike Lane**, 9 High Road, Wood Green, London, N22 6BH (1 min walk) – open 24 hours
- **Game Nation**, 49 High Road, Wood Green, London, N22 6BH (1 min walk) – open 24 hours

There are nine other gambling premises between Wood Green Underground station and Turnpike Lane Underground station:

- **Ladbrokes**, 742 Lordship Lane N22 5JP
- **Paddy Power**, 3a Hollywood Green, High Road N22 6EJ
- **Ladbrokes**, 12 The Broadway, High Road, N22 6DS
- **William Hill**, 9 The Broadway, High Road N22 6DS
- **Merkur Cashino**, 91 High Road, Wood Green, London, N22 6BB – AGC open 24 hours
- **Betfred**, 64 High Road, Wood Green, London, N22 6DH
- **Paddy Power**, 33 High Road N22 6BH
- **Ladbrokes**, 13 High Road N22 6BH

- **Betfred**, 679a Green Lanes, N22 0QY

Figure 1 highlights a high number of gambling premises from Wood Green High Road to West Green Road. The extension of the operating hours would detract from the diversity of uses on the high road. This does not benefit the licensing objectives, protecting children and other vulnerable persons from being harmed or exploited by gambling.



Figure 1. Map of gambling premises from the High Road to Green Lanes.

Prevalence

It is estimated 115,452 Haringey residents and 10,218 young people (ages 16-24) take part in some form of gambling based on the reported national percentages.

Approximately, 145 patients in total are receiving NHS gambling addiction treatment in Haringey. This does not account for others receiving treatment in gambling support services and the voluntary sector, however, highlights there is a gambling addiction issue in Haringey.

Estimated fiscal cost of gambling harm to Haring

In April 2023, the National Institute of Economic and Social Research (NIESR) estimated that the annual fiscal cost of 'problem gambling' (PGSI 8+) is roughly £1.4 billion (in 2023 prices)

In Haringey the annual fiscal costs of gambling harm is £7.9m 2023-24 (Based on research by GambleAware/YouGov and the National Institute of Economic and Social Research.). This includes costs to social care, NHS, homelessness, unemployment, and the criminal justice system and does not account for losses to the individual or family.

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The table below shows the excess cost of harm associated with gambling across Hornsey and Wood Green and GB. and GB. NIESR's national figures have been apportioned to Hornsey and Wood Green based on the Parliamentary Constituency's estimated share of the total number of people in Great Britain who are PGSI 8+.

Using this methodology, the total fiscal cost of harm associated with 'problem gambling' in Hornsey and Wood Green is estimated to be £2,232,954.

Table 1. The cost of harm associated with gambling in Hornsey and Wood Green (2023), where Little Vegas is located.

Cost of harm associated with gambling	Hornsey and Wood Green	Great Britain
Health: General Medical Service Consultation (mental health)	£36,371	£21,600,000
Health: Hospital Inpatient	£752,176	£446,700,000
Crime: Crime Committed (police call out)	£53,883	£32,000,000
Crime: Court Appearance	£15,155	£9,000,000
Housing: Homelessness Support	£27,784	£16,500,000
Welfare: Universal Credit	£1,347,585	£800,300,000
Fiscal cost (£ millions)	£2,232,954	£1,400,000,000

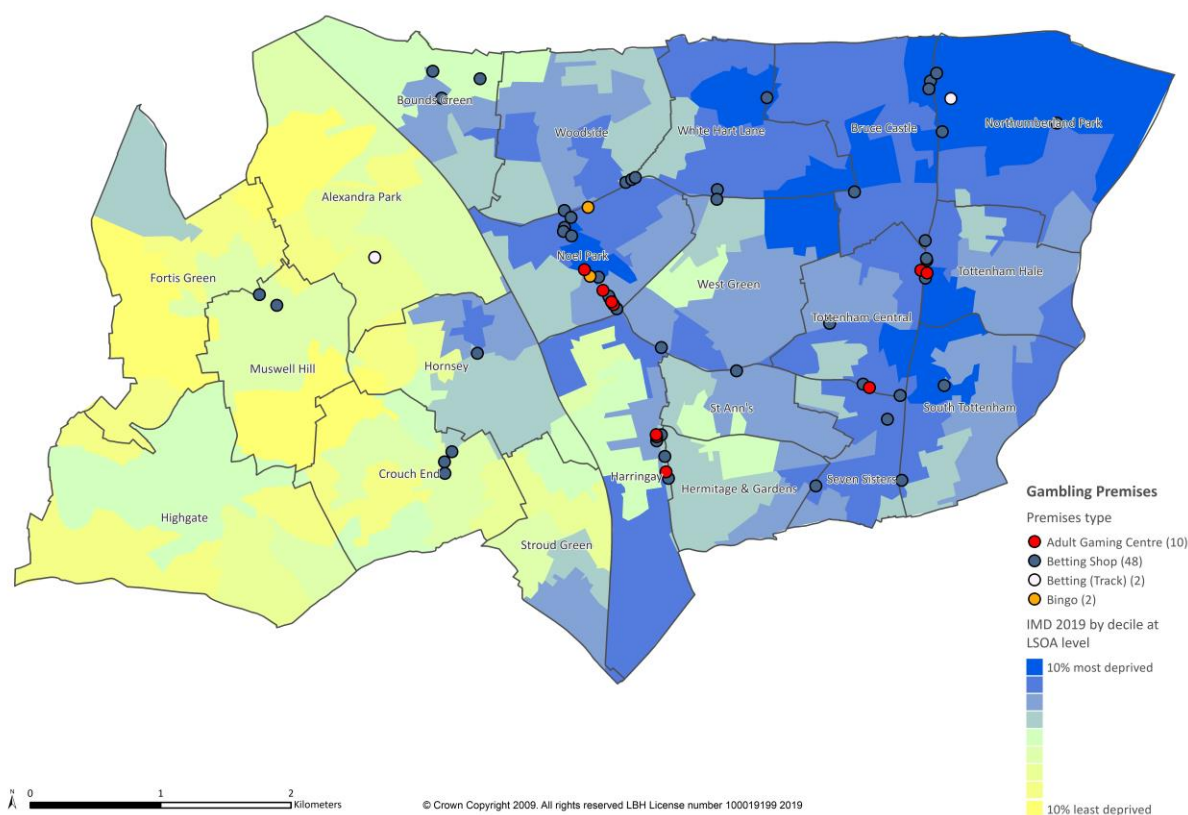


Figure 2. Map of the location of gambling premises in Haringey, 2023.

From Figure 2 you can see Haringey has a number of gambling establishment in the borough (2023). Gambling is a pressing health inequalities issue. More deprived wards have higher number of gambling premises and this is linked to deprivation levels.

The Noel Park ward area is one of the most deprived areas in London, data from the Census 2021 shows that 60.7% of households are experiencing at least one dimension of deprivation in Noel Park². The Public Health team believe the proposal of another 24-hour

adult gaming centre will make matters worse for the residents in terms of health and wellbeing. The most disadvantaged groups have the lowest gambling participation rates, but the highest levels of harmful gambling and they are also the most susceptible to harm, which is likely to make existing health inequalities worse (PHE, Gambling-Related Harms Review 2021).

The Noel Park Ward ranks high in all risk factors associated with gambling-related harm in individuals, as listed below:

- High deprivation indices
- Increased number of residents on Universal Credit
- High numbers of people who are rough sleeping
- High percentage of residents from a minority ethnic background
- Families from very low median household income
- High unemployment rates
- High level of long-term health conditions and disability (which may include mental health issues).

An analysis of the number of gambling premises in Haringey illustrates there are 2.8 gambling premises per 10,000 of the population (Table 1) which is much higher than the national average of 1.6 per 10,000³. At a ward level, it shows Noel Park Ward has the highest number of gambling premises than the rest of the wards, with nearly 14 premises per 10,000 of the population.

Table 2. Gambling premises per 10,000 of population in Haringey (2023).

Ward	Ward population	Number of gambling premises	Premises per 10,000
Alexandra Park	9,632	1	1.04
Bounds Green	8,605	3	3.49
Bruce Castle	12,653	4	3.16
Crouch End	11,333	3	2.65
Fortis Green	12,342	0	0.00
Harringay	14,299	7	4.90
Hermitage & Gardens	12,214	0	0.00
Highgate	7,130	0	0.00
Hornsey	15,527	1	0.64
Muswell Hill	8,257	2	2.42
Noel Park	14,906	15	10.06
Northumberland Park	16,843	4	2.37

St Ann's	12,256	1	0.82
Seven Sisters	8,185	2	2.44
South Tottenham	18,690	2	1.07
Stroud Green	10,935	0	0.00
Tottenham Central	15,934	5	3.14
Tottenham Hale	11,962	4	3.34
West Green	13,242	2	1.51
White Hart Lane	13,160	2	1.52
Woodside	18,253	4	2.19

Figure 3 demonstrates the negative impact gambling can have on high streets in Haringey.

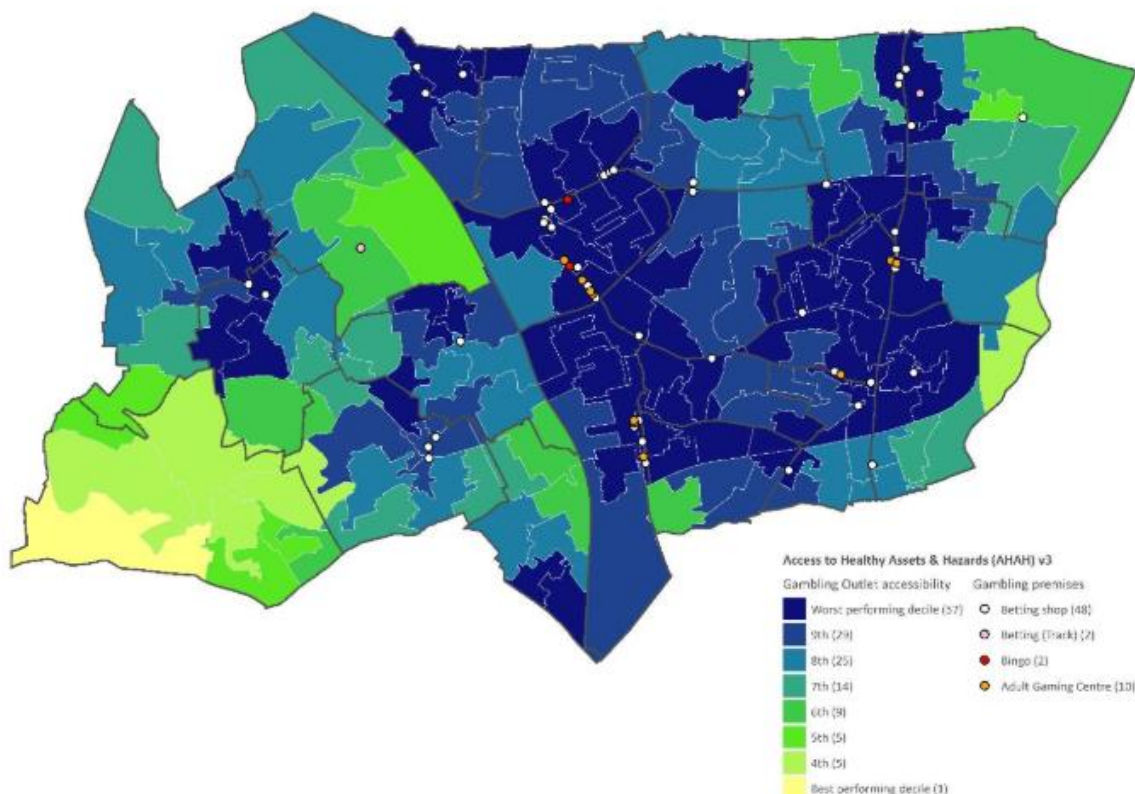


Figure 3. Map of Access to Health Assets and Hazards focus on gambling outlet accessibility in Haringey, 2022.

This map is sourced from the Consumer Data Research Centre. They have developed the AHAH (the index of 'Access to Health Assets and Hazards'). It's a multi-dimensional index for Great Britain measuring how 'healthy' neighbourhoods are. One of the metrics used in the index is the 'Distance to nearest Gambling Outlet (minutes)' which is what has been mapped here.

It shows that 83.9% (52 of the 62) of gambling premises in Haringey are located within the worst performing decile in Great Britain i.e., are among the 10% of LSOAs with the shortest distance to a gambling outlet. Furthermore, comparatively, the worst performing decile for gambling outlets only make-up 39.3% (57 LSOAs) of Haringey's LSOAs. Therefore, increasing the number or extending the hours of any of gambling premises in the worst performing areas of our borough undermines Haringey Council's efforts in creating a vibrant and healthy high street.

Problem Gambling and Vulnerable Groups

We must recognise that gambling does not place the onus on individual responsibility, but instead it can be a health harming activity to anyone because of the addictive nature of products, their ease of access, and the way they are promoted.

There is strong research which gives a clearer picture of those who are likely to be more vulnerable to gambling harm⁴. Amongst the groups, where the evidence base for vulnerability is strongest, include those with a history of mental ill-health, substance abuse or gambling addiction; people with learning disabilities/difficulties; immigrants; homeless people; the unemployed or those on low income. This could include area-based vulnerability, such as demographics and areas of deprivation⁵.

The table below shows the proportion of people in key demographic groups with relatively high levels of 'Problem gambling' (i.e. a PGSI Score of 8+). The table compares the breakdown of these groups across Hornsey and Wood Green compared with England as a whole.

- Younger people have a higher prevalence of 'problem gambling' (PGSI 8+): with a rate of 6.8% among those aged 18-34, compared with 3.0% across all age groups. Hornsey and Wood Green has a higher proportion of people aged 18-34 (23.1%) compared with the England average (21.8%).
- People from Black, Asian and other minority ethnic groups are more likely to be PGSI 8+ (8.4%, compared with 2.2% for those of White ethnicity). Hornsey and Wood

Green have a higher proportion of people from Black, Asian and other minority ethnic groups (32.6%) compared with the England average (19.0%).

- People who are unemployed or economically inactive are more likely to be PGSI 8+ (4.1% - compared with an overall average of 3.0% across England). Hornsey and Wood Green have a higher proportion of people unemployed or economically inactive (22.3%) compared with the England average (20.5%).
- Full-time students also show a relatively high prevalence of 'problem gambling' (this is likely to be linked to the higher prevalence among young adults observed above). 6.8% of full-time students are PGSI 8+, compared with an average of 3.0% of all adults across England. Hornsey and Wood Green have a similar proportion of full-time students (2.2%) compared with the England average (2.3%).
- People not in a relationship are more likely to be PGSI 8+ (3.9%, compared with 2.2% for those in a relationship). Hornsey and Wood Green has a higher proportion of people who are not in a relationship (63.5%) compared with the England average (55.3%).

Table 3. Demographic groups with relatively high levels of 'problem gambling' and the proportion of those living in Hornsey and Wood Green constituency.

Demographic groups with relatively high levels of 'problem gambling' (PGSI score 8+)	PGSI 8+ (%)	England (%)	Hornsey and Wood Green (%)
Aged 18-34	6.8%	21.8%	23.1%
Black, Asian and other minority ethnic	8.4%	19.0%	32.6%
Unemployed/ Inactive	4.1%	20.5%	22.3%
Full time student	6.8%	2.3%	2.2%
Not in a relationship	3.9%	55.3%	63.5%
England average	3.0%		

Mental Health

Haringey has one of the highest levels of mental health illnesses in London. 29 per 1,000 living in Haringey are on Employment and Support Allowance (ESA) claimants for mental and behavioural disorders. This is higher than the London (22.5 per 1,000) and England (27.3 per 1,000) averages (PHE, 2019).

The estimated prevalence of common mental disorders in Haringey for ages 16 and over is 22.3%, which is higher than London (19.3%) and England (16.9%) (PHE, 2017).

Access to gambling venues increases gambling activity and problem gambling. Problem and pathological gambling is linked to poor health, low level and severe mental health problems and a co-dependence on alcohol.

People Rough Sleeping

Haringey has also seen an increase in the number of people who are rough sleeping with a range of overlapping and multiple disadvantages, such as addiction, poor physical and mental health, contact with institutions as children or adults and offending histories and experiences of trauma.

Gambling problems are more prevalent in the population facing homelessness than the general population, 11.4% of the homeless population is found to have problem gambling. 61.5% of participants with some level of gambling risk had problems before homelessness, 15.4% reported experiencing problems after homelessness⁶.

Another research reinforces the assertion that problem gambling is a significant issue within the homeless population and is more commonly a cause than a consequence of homelessness (Sharman, Dreyer & Clark 2012⁷).

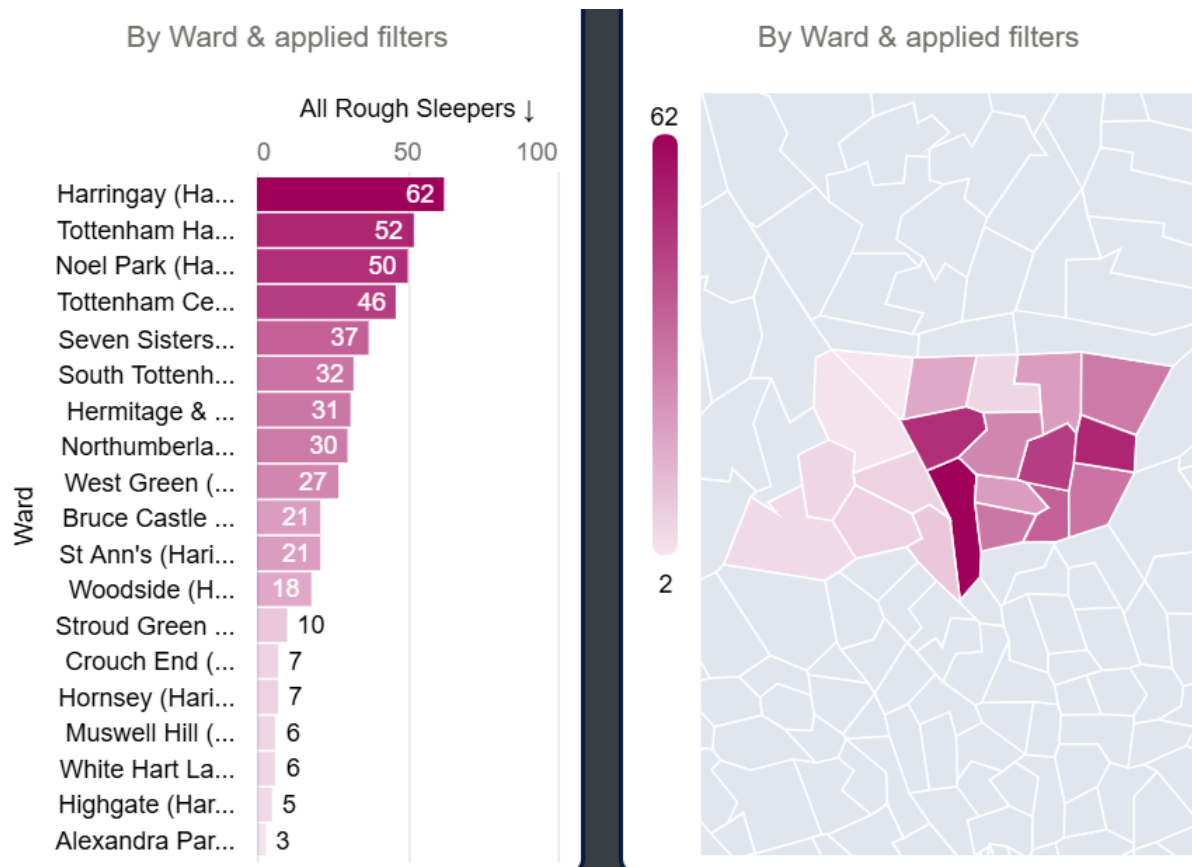


Figure 4. The number of people seen rough sleeping by outreach teams in Haringey since June 2022, (CHAIN, 2025).

Figure 4 shows the number of people seen rough sleeping by outreach teams. The map highlights Noel Park to be one of the wards with the greater concentration of those rough sleeping. However, this is only the number of people outreach teams have been able to contact, it is likely the figure is much higher.

Substance misuse

There is frequently a link with alcohol or drugs as a way of coping with anxiety or depression caused by gambling problems.⁸ Availability of opportunities to gamble and the incidence of harmful gambling within a community are known to be linked. As a result, the proposed use of the premise will attract a high level of residents who are highly dependent on alcohol and drugs.

Unemployment or Low-Income Groups

An increase in gambling outlets densely populated in the ward may cause gambling addiction which can fuel lack of money for families in this ward.

Noel Park ward has the highest levels of employment deprivation in the borough shown in Figure 5. 10% of Noel Park residents are unemployed. This is above both the Haringey (8.6%) and London (7.3%) averages. In Noel Park, there are 288.7 per 10,000 residents who claim benefit principally for the reason of being unemployed. This is above both the Haringey and London levels (251.8 per 10,000 residents and 201.7 per 10,000 residents respectively). The rate of claimants in Haringey is almost 25% higher than the London rate.

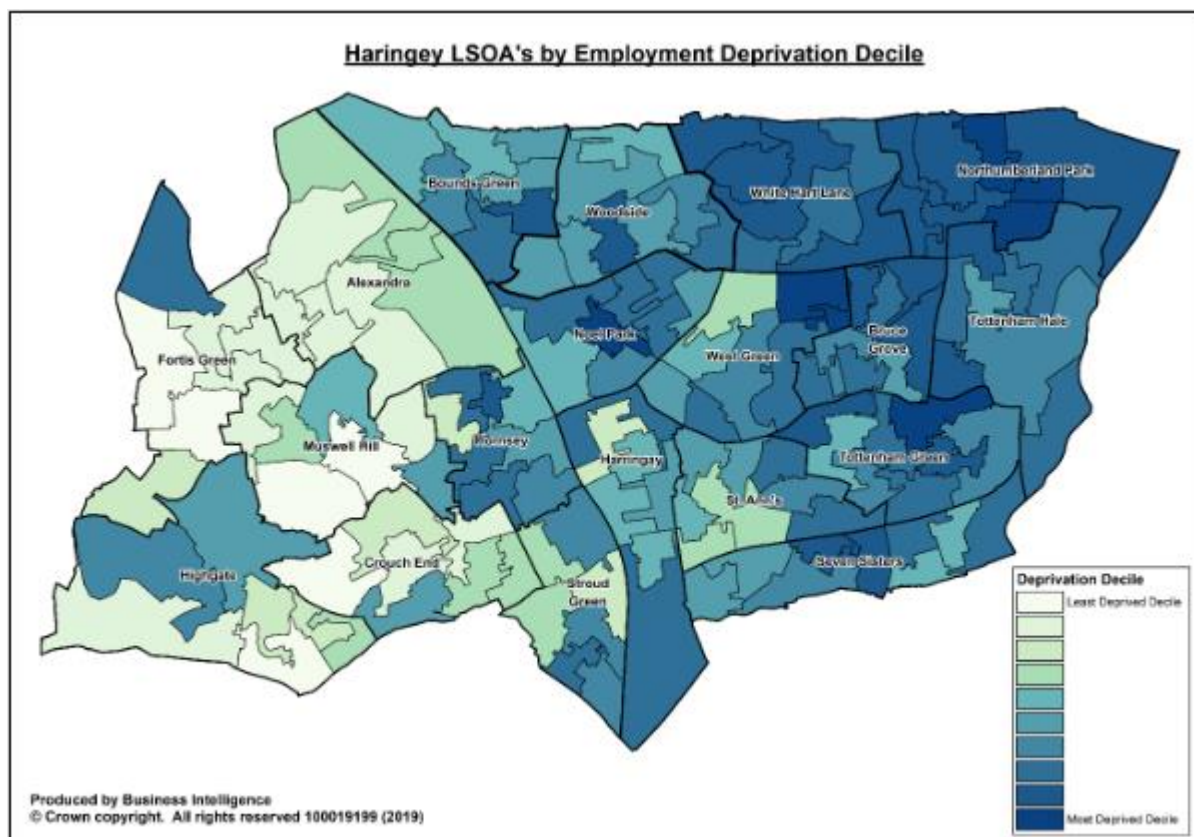


Figure 5. Pre-COVID employment deprivation in Haringey, 2019.

During the COVID 19 pandemic, Haringey experienced the largest increase in unemployment claimant for benefits among the 11 Central London Boroughs and has now become the 6th highest in the UK. Of those who were in work in February 6% (660 households) had lost their job by May 2019. Tottenham Hale and Noel Park wards were particularly badly hit, relative

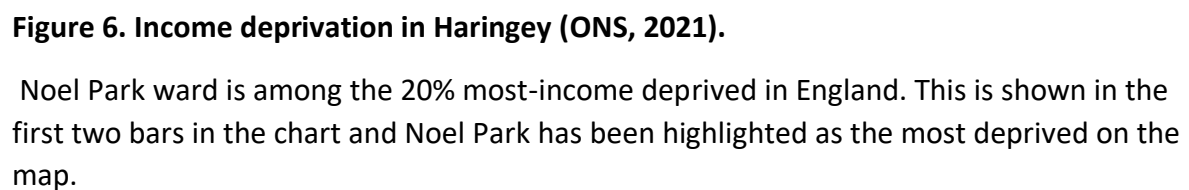


Figure 6. Income deprivation in Haringey (ONS, 2021).

Noel Park ward is among the 20% most-income deprived in England. This is shown in the first two bars in the chart and Noel Park has been highlighted as the most deprived on the map.

Problem Gambling and Location of Gambling Premises

A study carried out in Brent suggests that the growth of gambling establishments, such as AGCs and betting shops, is particularly prominent in areas with high levels of social and economic deprivation.

Protecting children and other vulnerable persons from being harmed or exploited by gambling

There are one infant school and four primary schools located within half a mile of the premises (ten-minute walk).

Primary Schools

- Noel Park Primary School (0.305 miles)
- North Haringay Primary School (0.347 miles)
- Belmont Infant School (0.435 miles)
- Belmont Junior School (0.435 miles)
- St John Vianney Catholic Primary School (0.486 miles)

Wood Green has good extensive transport links such as bus stops (Coleraine Road and Turnpike Lane) and tube stations (Wood Green and Turnpike Lane), which is used by young people and other vulnerable people. We are seeing an increase in gambling premises located close to transport hubs. Children and young people passing the concentration of gambling businesses normalises the harmful culture of gambling amongst children and vulnerable groups.

As part of the [School Superzone project](#) the Public Health team conducted focus groups with children and parents between late 2019 and February 2020. During the focus groups parents commented on the large volume of gambling shops in close proximity to each other and one parent expressed concern about the influence this would have on children and their development, with concerns raised about the possibility of enabling gambling addictions in the future.

For every person that experiences gambling harms, between six to ten people are negatively affected. This includes children, parents, wider family members, friends, neighbours and

work colleagues ¹. These gambling related harms include child poverty, homelessness, domestic violence, suicide, mental health and debt².

In late 2022, the Public Health team conducted a series of focus groups to help shape our Gambling Harms Reduction Programme. The team heard accounts on the effects of gambling from residents who cited Wood Green and Tottenham High Road as the specific areas of concern. As a result, we have developed support and treatment pathways and clinics. One of the clinics is situated in Wood Green has been seeing residents face-to-face. The extension of hours will be undermining the programme of work we have developed to combat harmful gambling. The participating residents engaged in the focus groups did not believe the gambling premises improved the high street and expressed very strongly how disappointed they were to see the number of gambling premises on the high street increasing.

Safety - Residents Survey and focus groups

Neighbourhood safety after dark has declined significantly, particularly in Wood Green.

44% of Residents of Noel Park are most likely to say they feel unsafe after dark (Haringey Resident Survey, 2021).

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Low Income Family Tracker (LIFT) data

The LIFT data tracks families on low income in the borough claiming housing benefit and/or council tax reduction. The data is based on 32,000 households across the Borough.

The table below shows the number of vulnerable residents of Noel Park ward.

Table 4.

	Number of residents within Noel Park Ward
In cash short fall	357
Unemployed	1522
Unemployed (Low barriers to work)	488
Unemployed under 25	22
Food Poverty	366

¹ Citizen Advice, 2018)

² Public Health England, 2021

Fuel Poverty	911
Relative Poverty	719
NEET	161
children in relative poverty	757 (higher than the Haringey and London average).
% claiming universal credits	19.7%

Homeless households in Temporary Accommodation

Figure 5 shows a cluster of homeless households in temporary accommodation. There are a cluster of temporary accommodation in Noel Park, where the premises is located. This highlights the financial vulnerability within the area.

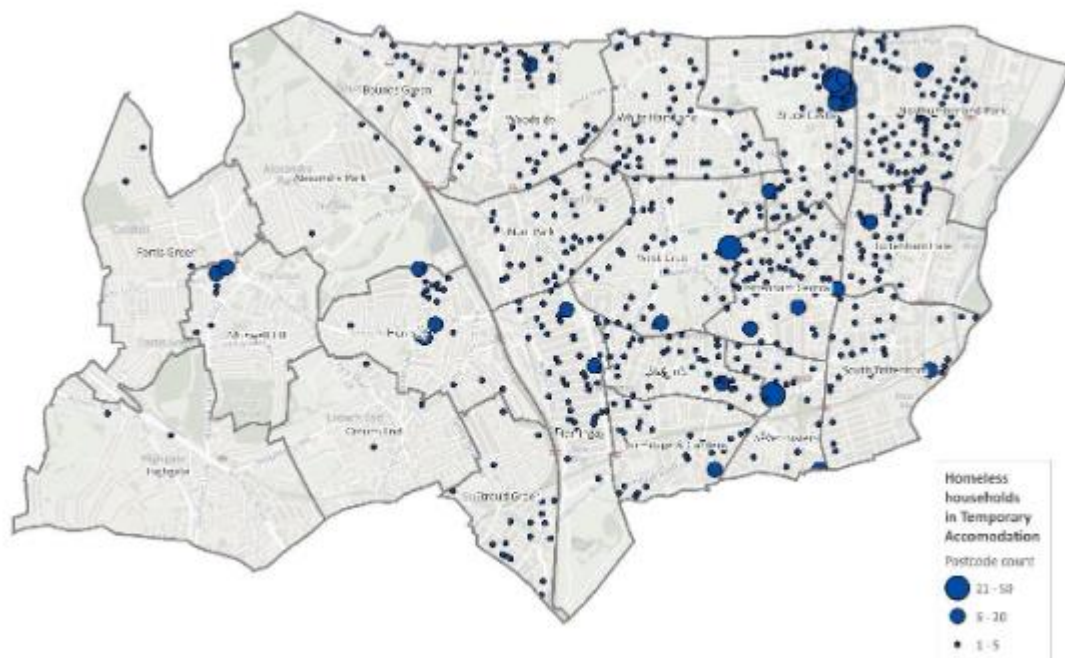


Figure 8. Map of Homeless Households in Temporary accommodation

Crime

Gambling as a source of crime or disorder, being associated with crime or disorder, or being used to support crime

Much of the focus on gambling-related crime tends to be upon people experiencing gambling harms. Criminal behaviour is most associated with harmful gambling as person gambling harmfully will spend more than their disposable income and often have to resort to criminal activity as a way of getting money to carry on gambling and repay associated debt problems⁸.

Haringey's crime rate is 122.7 per 1,000 population, compared to 109.2 for London. This is 12% above the London average. Noel Park is the 19th highest volume crime ward in London, of the 669 total wards⁹.

The premises is located within the Noel Park ward which is ranked the highest in crime rate. The most common form of crime is theft, as shown in figure 6.

The most common offences committed by problem gamblers are income-producing crimes such as theft, fraud or drug dealing to pay off their gambling debt or gather funds to continue to gamble (GamCare, 2019).

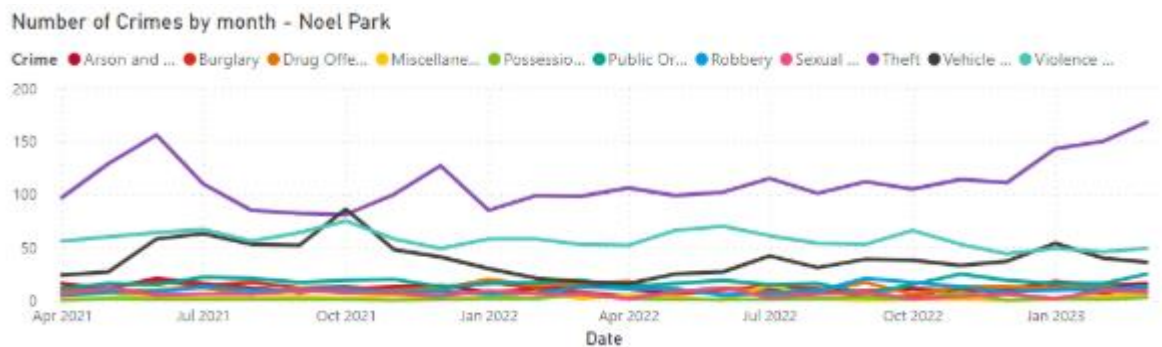


Figure 6. Number of Crimes by month (Haringey Ward Profiles, 2023)

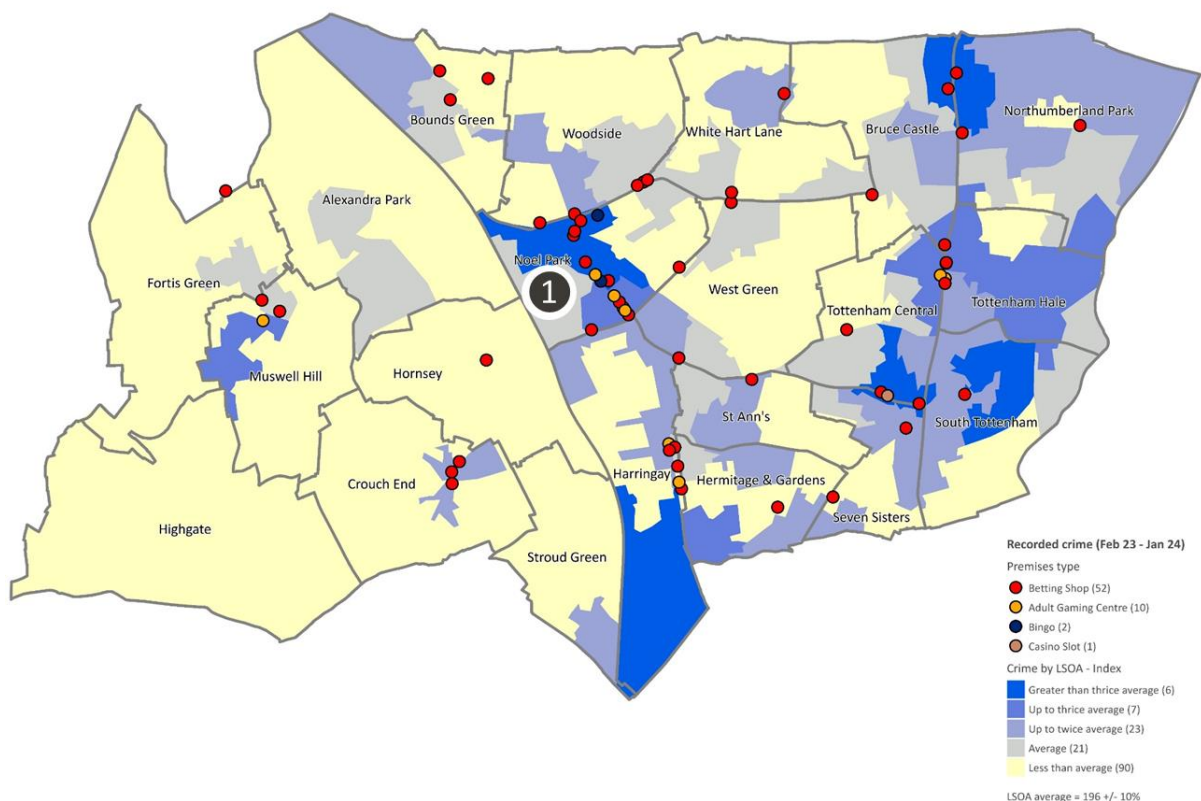


Figure 9 shows Haringey split into lower layer super output areas (LSOAs)* and by recorded crimes in the borough. The blue colours represent higher crime levels (see key). Gambling premises are shown as well.

Figure 9 highlights the high concentration of recorded crime in Noel Park Ward, particularly the wood green high street, where the premises is located.

Linking with the Corporate Plan Priorities

The council is taking action to improve public health and deliver better outcomes for residents to address the gap in life expectancy between the East and West of the borough”.

The location of the proposed premises targets the poorer communities, and it becomes harder for the health inequalities gap to close. If the licensing application is to be granted it will not align with the The Corporate Delivery Plan (<https://www.haringey.gov.uk/council-elections/council-policies-plans/corporate-delivery-plan>) to reduce health inequalities, create healthy spaces and neighbourhoods for children and give children the best start in life. It will not demonstrate our preventative efforts to support families and enhance mental wellbeing.

Conclusion

Given the evidence presented by the Public Health team, we do not believe the applicant can sufficiently mitigate the associated harms, due to the nature of their business and the already oversaturated number of gambling premises in the Wood Green area. The Local Area Risk Assessment does not adequately address the potential risks. Extending the operating hours of the AGC is likely to have a detrimental impact on the health and wellbeing of Haringey residents.

If this licensing application is not rejected, we suggest that consideration be given to:

1. The applicant must not exceed the approved planning operating hours made on 19/07/2023 - The use hereby permitted shall not be operated before 08:00 hours or after 02:00 hours Monday to Sunday and Bank Holidays. This permission is given to facilitate the beneficial use of the premises whilst ensuring that the amenities of adjacent residential properties are not diminished consistent with Policy DM1 of The Development Management DPD 2017. Planning report can be found here: (https://publicregister.haringey.gov.uk/pr/s/planning-application/a0i8d000005TxBIAA0/hgy20231953?c_r=Arcus_BE_Public_Register&tabset-3892f=3)
2. No digital gambling advertising and sponsorship especially on the shop frontage (if any) to protect young people from exposure to gambling. We would like to see safer gambling messages being promoted.
3. There should be no illumination of the signage on the shop frontage. The applicant must consider public health comments and update their Local Area Risk Assessment
4. The applicant shall take reasonable steps to prevent nuisance directly outside the premises.
5. No alcohol shall be permitted to be consumed on the premises at any time during which facilities for gambling are being provided on the premises.
6. There must be advertising of our local Gambling Harms services on leaflet and as part of staff gambling harms training and all new staff need to be aware of local and national services and actively support the referral of those at risk or showing signs of gambling harms and include it in their risk assessment. They should keep a log of referrals for inspection by the local authority inspectors or the police.