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## **LICENSING SUB-COMMITTEE A**

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**THURSDAY 1 NOVEMBER 2007 at 19:00 HRS**  
**Civic Centre, High Road Wood Green N22**

**MEMBERS:** Councillors Demirci, Patel (Chair) and Vanier

### **AGENDA**

**1. APOLOGIES FOR ABSENCE**

**2. 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 at Item 5 below).

**3. DECLARATIONS OF INTEREST:**

A member with a personal interest in a matter who attends a meeting of the authority at which the matter is considered must disclose to that meeting the existence and nature of that interest at the commencement of that consideration, or when the interest becomes apparent.

A member with a personal interest in a matter also has a prejudicial interest in that matter if the interest is one which a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice the member's judgment of the public interest **and** if this interest affects their financial position or the financial position of a person or body as described in paragraph 8 of the Code of Conduct **and/or** if it relates to the determining of any approval, consent, license, permission or registration in relation to them or any person or body described in paragraph 8 of the Code of Conduct.

**4. SUMMARY OF PROCEDURE: (PAGES 1 - 2)**

The Chair will explain the procedure that the Sub-Committee will follow for each of the hearings considered. A copy of the procedure is attached.

**5. METROBET LTD, 507 GREEN LANES N4 (PAGES 3 - 88)**

To consider an application to provide the provision of facilities for betting, whether by making or accepting bets, by acting as a betting intermediary or by providing other facilities for the making or accepting of bets (a "Betting Premises Licence").

This application must be considered under these 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

**6. NEW ITEMS OF URGENT BUSINESS:**

To consider any new items of urgent business admitted at Item 2 above.

**YUNIEA SEMAMBO**  
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**19 October 2007**

## **LICENSING SUB-COMMITTEE PROCEDURE – GAMBLING ACT 2005 – HEARINGS REGULATIONS S.I. 2007 / 173**

Each application that comes before this sub-committee will be treated on its own merits, and this licensing authority will take its decision based upon the requirement to aim to permit the use of premises for gambling in so far as this licensing authority think it:

- In accordance with any relevant code of practice
- In accordance with Gambling Commission guidance
- Reasonably consistent with the licensing objectives of the Gambling Act 2005
- In accordance with this licensing authority's Statement of Principles

### **THE PROCEDURE OF THE SUB-COMMITTEE IS AS FOLLOWS:**

1. Chair opens the meeting, introduces members of the sub-committee and officers present and explains the procedure to be followed.
2. Chair asks sub-committee to deal with any preliminary issues e.g. non-attendance of parties, requests for adjournment, admissibility of documents or other evidence/representations.
3. The officer outlines the details of the application, any representations received and / or reasons why the licensing authority proposes to attach / exclude conditions, with relevance to the Gambling Commission's guidance, the licensing objectives, and / or the licensing authority's Statement of Principles, highlighting what the committee should have regard to / take into consideration and drawing attention to any other matters that may require clarification or discussion.
4. Members and the parties/representatives may ask any relevant questions of officer.
5. Chair invites applicant (or representative) to address the sub-committee (includes calling any 'witnesses').
6. Members ask relevant questions of applicant / 'witness'.
7. Parties that made representations to ask relevant questions of applicant / 'witness'.
8. Parties making relevant representations invited to address sub-committee.
9. Members ask relevant questions of party.
10. Applicant / other parties making representations / officer ask relevant questions of party.
11. Officer of the licensing authority to ask relevant questions of applicant / 'witness' (where the licensing authority proposes to attach / exclude conditions or there is some other issue requiring clarification/discussion).
12. Officer of the licensing authority invited to address the sub-committee (where the licensing authority proposes to attach / exclude conditions or there is some other issue requiring clarification/discussion).
13. Members ask relevant questions of officer.
14. Applicant / parties making representations ask relevant questions of officer.
15. All parties invited to summarise (if they so wish).
16. Chair asks all parties if they are satisfied that they have had the opportunity to say everything that they wish to.

17. Members of the sub-committee retire to reach a decision with the Committee Clerk and legal representative.

18. Decision and reasons will be outlined by the Committee Clerk.

**PLEASE NOTE**

- Changes of sub-committee membership (if any) will be given at the beginning of the meeting.
- Hearings may proceed even if one of the parties is absent. All notices and representations received from absent parties will be considered.
- Documentary evidence produced at the hearing will only be considered with agreement of all parties present.
- In cases where a decision cannot be given at the end of the hearing, the decision will normally be made within 5 working days after the day of the hearing and that the parties will be notified in writing.
- Parties have a right to appeal to the Magistrates Courts, within 21 days of notification of the decision.
- The sub-committee may on occasion find it necessary to exclude members of the press and public based upon the reasons set-out in SI 2007 / 173 article 8 which are if any unfairness to a party is likely to result from a public hearing, or there is a need to protect the commercial or other legitimate interests of a party.
- The hearing is intended to take the form of a discussion led by the sub-committee and cross-examination is not encouraged unless the sub-committee considers that it is required for the application to be properly considered.
- The sub-committee has the right to exclude any parties disrupting the hearing or require him / her to meet certain conditions for him / her to continue to take part in the hearing. Any person excluded in this manner is able to submit information in writing to the sub-committee before it finishes.
- Any part of the procedure may be waived or varied by the Chair if there is good reason to do so.
- This procedure is a summary of the more detailed Haringey Council Local Licensing Procedure Rules for Hearings which is available on request.



**Gambling Act 2005 Licensing Sub-Committee 1<sup>st</sup> November 2007**

**Report title: Application for a Premises Betting Licence for METROBET LTD, 507 GREEN LANES, HARINGEY, LONDON N4 1TB**

**Report of: The Lead Officer - Licensing**

**Ward(s) Noel Park**

**1. Purpose**

To consider an application by **METROBET LTD LIMITED** to provide the provision of facilities for betting, whether by making or accepting bets, by acting as a betting intermediary or by providing other facilities for the making or accepting of bets (a "betting premises licence").

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. Principles to be applied**

2.1 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. 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.

**Recommendations**

4. 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.

A licensing Authority shall not determine an application for a premises licence made in reliance on section 159(3)(b) until the relevant operating licence has been issued in a form which authorises the applicant to carry on the activity in respect of which the premises licence is sought.

|                                                                                                  |                                                                                                                               |
|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                  |                                                                                                                               |
| Report authorised by: Robin Payne.....                                                           | <br>Assistant Director Enforcement Services |
| Contact Officer: Ms Daliah Barrett                                                               | Telephone: 020 8489 8232                                                                                                      |
| <b>3. Executive summary</b>                                                                      |                                                                                                                               |
| For consideration by Sub Committee under the Gambling Act 2005 for a Betting Premises Licence.   |                                                                                                                               |
| <b>4. Access to information:</b>                                                                 |                                                                                                                               |
| Local Government (Access to Information) Act 1985                                                |                                                                                                                               |
| Background Papers                                                                                |                                                                                                                               |
| The following Background Papers are used in the preparation of this Report:                      |                                                                                                                               |
| <b>File: METROBET, 507 GREEN LANES, HARINGEY, LONDON N4 1TB</b>                                  |                                                                                                                               |
| The Background Papers are located at Enforcement Service, Civic Centre, High Road Wood Green N22 |                                                                                                                               |

## 5. REPORT

### Background

**5.1** Application by **METROBET LIMITED** for a Premises Licence in respect of **METROBET, 507 GREEN LANES, LONDON, N4 1TB** under the Gambling Act 2005.

The application has followed the prescribed format and all consultations have been undertaken. **App 1**. The applicant has an operating licence granted by the Gambling Commission and notified by their letter **App 1A**.

**5.2** Members are reminded of the three licensing objectives under the Gambling Act 2005 which are:

- (a) preventing gambling from becoming 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 persons from being harmed or exploited by gambling.

**5.3** When determining an application the Licensing Authority “shall aim to permit the use of premises for gambling in so far as Members think it”:

- In accordance with the relevant Codes of Practice (under s.24)
- In accordance with Guidance by the Gambling Commission (under s .25)
- Reasonably consistent with the three Gambling Licensing Objectives, and
- In accordance with the Haringey Council Statement of Gambling Policy.

**5.4** The Gambling Commission’s Guidance (paragraph 5.27) tells Local Licensing Authorities that moral objections to gambling are not a valid reason to reject applications for premises licences. This is because they do not relate to the Gambling Licensing Objectives. Except where a Council resolves not to allow casinos in its area, a decision on an application cannot be based on dislike of gambling or on a general notion that it is undesirable to allow gambling premises in an area. If an application is rejected, the Licensing Authority should rely on reasons that demonstrate that the Gambling Licensing Objectives are not being met, or are unlikely to be met.

**5.5** The Guidance on the first gambling licensing objective (preventing gambling being a source of crime or disorder) states that “The Commission will play a leading role in preventing gambling from being a source of crime. It will maintain rigorous licensing procedures that aim to prevent criminals from providing facilities for gambling....The Act provides the Commission with powers to investigate the suitability of applicants for operating and personal licences..... As applicants for premises licences...will have to hold an operating licence from the Commission before the premises licence can be issued, licensing authorities will not need to investigate the suitability of an applicant.....Licensing authorities will need to consider the location of the premises in the context of this licensing objective. If an application for a licence or permit is received in relation to

premises that are in an area noted for particular problems with organised crime, for example, licensing authorities should think about what (if any) controls might be appropriate to prevent those premises becoming a source of crime. These might include conditions being put on the licence, such as a requirement for door supervisors.”

**5.6** On disorder the Commission’s Guidance continues “In relation to preventing disorder, the licensing authority does have the ability under section 169 of the Act to impose licence conditions. These could include a requirement for door supervision as provided for in section 178....Local authorities should note that in the case of gambling premises licenses, disorder is intended to mean activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor. It should be noted that unlike the Licensing Act [2003] the Gambling Act [2005] does not include, as a specific licensing objective, the prevention of public nuisance. Any nuisance associated with gambling premises should be tackled under other relevant laws.”

**5.7** The Guidance on the second gambling licensing objective (ensuring that gambling is conducted in a fair and open way) states that “Generally, the Commission would not expect licensing authorities to become concerned with ensuring that gambling is conducted in a fair and open way as this will be a matter for either the management of the gambling business, and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence. For example, the Commission will require through operating licences that there is sufficient space around tables and machines to prevent the jostling of players.”

**5.8** The Guidance on the third gambling licensing objective (protecting children and vulnerable persons from harm) states that “With limited exceptions, the intention of the Gambling Act is that children and young persons should not be permitted to gamble and should be prevented from entering those gambling premises that are adult-only environments. The objective talks of protecting children from being “harmed or exploited by gambling”. That means preventing them from taking part in gambling and for there to be restrictions on advertising so that gambling products are not aimed at children or advertised in such a way that makes them particularly attractive to children. Licensing authorities will need to consider whether specific measures will be needed to protect children on particular categories of premises. This may include requirements such as supervision of entrances...”

**5.9** On vulnerable persons, the Guidance continues “The Act does not seek to prohibit particular groups of adults from gambling in the way that it prohibits children. The Commission will not seek to define “vulnerable persons”, but it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people

who may not be able to make informed or balanced decisions about gambling due to mental impairment, alcohol or drugs. Licensing authorities will need to consider in relation to particular premises whether any special considerations apply in relation to the protection of vulnerable persons. Any such considerations will need to be balanced against the authority's objective to permit the use of premises for gambling."

- 5.10** The Haringey Council Statement of Gambling Policy (SGP) on page 5 under "General Principles" provides that "when determining an application to grant a premises licence...regard will be had to the proximity of the premises to schools, vulnerable adult centres or residential centres where there may be a high concentration of families with children. The proximity of premises taken into consideration will vary depending on the size and scope of the gambling premises concerned. Each case will, however, be decided on its merits. Therefore, if an applicant can effectively demonstrate how they might overcome licensing objective concerns, this will be taken into account."
- 5.11** On page 12 under the heading "Location" the SGP states "This licensing authority 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. As per the Gambling Commission's 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. Should any specific policy be decided upon as regards areas where gambling premises should not be located, this statement will be updated. It should be noted that any such policy does not preclude any application being made and each application will be decided on its merits, with the onus upon the applicant showing how potential concerns can be overcome."
- 5.12** On page 13 the SPG continues "In considering licence applications the Council may take into account the following:-
- (1) The design and layout of the premises;
  - (2) The training given to staff in crime prevention measures appropriate to those premises;
  - (3) Physical security features installed in the premises. This may include matters such as the position of cash registers or the standard of CCTV that is installed;
  - (4) Where premises are subject to age restrictions, the procedures in place to conduct age verification checks;
  - (5) The likelihood of any violence, public order or policing problem if the licence is granted.
- 5.13** The Committee are asked to consider the application in light of the representation received from William Hill, Ladbrokes and Coral Estates Ltd as well as local residents attached at appendix 3. Members are guided to part 2 above 'Principles to be applied' and copies of the relevant codes of practice are attached with this report. (**App 2**- Codes of Practice)
- 5.14** There are also two statutory disregards. (i) It is expressly provided (s.153(2)) that in determining whether to grant a premises license, a licensing authority may not have regard to the expected demand for the facilities which it is proposed to

provide. (ii) The licensing authority shall not have regard to whether the proposal is likely to receive planning or building regulations approval (s.210).

**6. RELEVANT REPRESENTATIONS (CONSULTATION)**

**Responsible Authorities:**

**6.1 The Licensing Authority**

No comments received in relation to this application.

**6.2 The Gambling Commission**

A confirmation of receipt of the application has been given by the Commission

**6.3 London Fire and Civil Defence Authority**

No comments received in relation to this application

**6.4 Metropolitan Police**

No comments received in relation to this application

**6.5 The Planning Department**

No comments received in relation to this application

**6.6 Environmental Health - Health and Safety/Noise Team/Pollution**

No comments received in relation to this application

**6.7 Trading Standards**

Have no objections to this application

**6.8 Safeguarding children nominee**

No comments in relation to this matter.

**6.9 Her Majesty's Commissioners of Custom and Excise**

Have received notification of the application

**6.10 Interested Parties - App 3**

For the purposes of this part a person is an interested party in relation to a premises licence or in relation to an application for or in respect of a premises

licence if, in the opinion of the licensing authority which issues the license or to who the application is made, the person: -

- (a) lives sufficiently close to the premises to be likely to be affected by the authorised activities.
- (b) Has business interests that might be affected by the authorised activities, or
- (c) Represents persons who satisfy paragraph (a) or (b)

Representation has been made by William Hill, Ladbrokes and Coral Estates Ltd this falls into (b) business interests that might be affected by the authorised activities. These representations as set out at **Appendix 3**, relates to over-proliferation of betting offices in the vicinity as well as other issues. All the trade representatives have been asked to explain the relevance of this representation having regard to the statutory requirement that the licensing authority shall not have regard to the expected demand for the proposed facilities (s.153(2)).

Residents have also made representation are basing their concerns on what they see as likely over exposure to gambling by the young and the vulnerable. Many residents have written in or signed a petition against this application, as well as the Ward Members.

**Metrobet** have responded to the trade representations stating that they should be rejected as being vexatious, frivolous and irrelevant as they provide no evidence to support the claims being made. **App 4**. Officers advise that the issue as to whether the trade representations are inadmissible as vexatious, frivolous and irrelevant should be determined by Members of the Sub-Committee at the start of the hearing if Metrobet wish to pursue this issue.

**Ladbrokes** have now withdrawn the representation they had made. – **App 4A**

## 7.0 Financial Comments

The fee which would be applicable for this application is **£2700.00**

## 8.0 Head of Legal Service Comments

The principles to be applied by the Licensing Sub-Committee in reaching a decision on this application are set out in paragraph 5.3 which quotes section 153 of the Gambling Act 2005. Members must have regard to the Gambling Commission's Guidance and the Council's own Statement of Gambling Policy. Relevant extracts have been included in this report above. The decision must be based on the three gambling licensing objectives at paragraph 5.2. Other political or moral factors are not relevant. Members should also bear in mind, generally, that the imposition of conditions may be able to meet objections to the grant of a premises licence depending on the facts of the specific case.

## 9.0 Licensing Officer Comments on Conditions

There are three types of conditions which may be attached to a Premises Licence.

- Mandatory (S167)
- Default (S168)
- Discretionary, set by the Licensing Authority (S169)

Mandatory and default conditions are prescribed in the Gambling Act 2005 and the "Conditions Regulations" (S.I. 2007/1409) for all premises and each premises type.

### 9.1 Matters not to be dealt with or restricted by conditions

Conditions attached by the Licensing Authority may not;

Conflict with Gambling Commission requirements (S169)

Require membership of a club or other body (S170)

Limit stakes or prizes (S171)

Restrict gaming machines categories, numbers or method of operation (S172)

The holder of a betting premises licence is authorised to make facilities available for betting on the outcome of a virtual game, race, competition or other event or process (S173).

### 9.2 Mandatory Conditions for all premises licences under the Conditions Regulations

The Conditions Regulations stipulate the mandatory and default conditions. They state that every Premises Licence will have the following conditions:

- (1) The conditions specified in paragraphs (2), (3) and (4) shall be attached to every premises license.
- (2) The summary of the terms and conditions of the premises license issued under section 164(1)(c) of the 2005 Act shall be displayed in a prominent place within the premises.
- (3) The layout of the premises shall be maintained in accordance with the plan.
- (4) The premises shall not be used for—
  - (a) the sale of tickets in a private lottery or customer lottery, or
  - (b) the sale of tickets in any other lottery in respect of which the sale of tickets on the premises is otherwise prohibited.



### **9.3 Mandatory Conditions for all premises licences under the Act**

#### **Section 183 Christmas Day**

A premises licence shall, by virtue of this section, be subject to the condition that the premises shall not be used to provide facilities for gambling on Christmas Day.

#### **Section 184 Annual Fee**

- (1) The holder of a premises licence-
- a. Shall pay a first annual fee to the licensing authority within such period after the issue of the licence as may be prescribed, and
  - b. Shall pay an annual fee to the licensing authority before each anniversary of the issue of the licence.

#### **Section 185 Availability of licence**

- (1) The holder of a premises licence shall-
- a. Keep the licence on the premises, and
  - b. Arrange for the licence to be made available on request to-
    - i. A constable
    - ii. An enforcement officer, or
    - iii. An authorised local authority officer

### **9.4 Mandatory conditions attaching to betting premises licences under the Conditions Regulations**

1. A notice stating that no person under the age of 18 years is permitted to enter the premises shall be displayed in a prominent place at every entrance to the premises.

2.—(1) Access to the premises shall be from a street or from other premises with a betting premises license.

(2) Without prejudice to sub-paragraph (1), there shall be no means of direct access between the premises and other premises used for the retail sale of merchandise or services.

3. Subject to anything permitted by virtue of the 2005 Act, or done in accordance with paragraphs 4, 5, 6 and 7 below, the premises shall not be used for any purpose other than for providing facilities for betting.

4. Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to leave any gaming machine or betting machine in order to do so.

5. No apparatus for making information or other material available in the form of sounds or visual images may be used on the premises, except for apparatus used for the following purposes—

(a) communicating information about, or coverage of, sporting events, including—  
(i) information relating to betting on such an event; and  
(ii) any other matter or information, including an advertisement, which is incidental to such an event;

(b) communicating information relating to betting on any event (including the result of the event) in connection with which betting transactions may be or have been effected on the premises.

6. No publications, other than racing periodicals or specialist betting publications, may be sold or offered for sale on the premises.

7. No music, dancing or other entertainment shall be provided or permitted on the premises, save for entertainment provided in accordance with paragraph 5.

8.—(1) 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.

(2) A notice stating the condition in sub-paragraph (1) shall be displayed in a prominent place at every entrance to the premises.

9. A notice setting out the terms on which customers are invited to bet on the premises shall be displayed in a prominent place on the premises to which customers have unrestricted access.

## **9.5 Mandatory conditions attaching to betting premises licences under the Act**

### **Section 180 Pool Betting on Dog Races**

This applies to all betting premises except dog tracks. It provides that pool betting on dog racing away from a dog track, for example in a High Street betting shop, may only be offered in accordance with existing arrangements made with the occupier of the dog track at which the racing in question takes place. This means that the dog track operator controls whether or not pool betting on races at his/her track is available outside the track.

**Note** – Pool betting is generally any form of betting which is not at fixed odds. It may not be possible for the gambler to know at the time of the bet being placed what the eventual winnings may be. The stakes of each gambler in a pool bet are aggregated and a proportion of the pool is then allocated to one or more of the winners. The football pools and the greyhound totalisator operate as pool betting.

## **9.6 Default Conditions**

### **Section 169 of the Act gives licensing authorities:**

- The ability to exclude from premises licenses any default conditions that have been imposed under the Conditions Regulations; and

- The power to impose extra conditions on the premises licenses that they issue. These may deal with matters that could have been covered by an excluded default condition.

**There is one Default Condition under the Conditions Regulations that will attach to a betting premises licence (other than in respect of tracks) unless it is excluded by the Licensing Authority. This is:**

- No facilities for gambling shall be provided on the premises between the hours of 10pm on one day and 7am on the next day.

### **9.7 Discretionary Conditions**

**In addition there are discretionary powers under section 169 of the 2005 Act to impose extra conditions as described below.**

**These may be specific statutory conditions in relation to door supervision or betting machines. These are discretionary conditions and a requirement for door supervisors or conditions on betting machines should only be imposed where Members consider it relevant and in accordance with the Guidance**

**In addition the Licensing Authority can impose extra conditions about other matters. This can include matters that could have been covered by an excluded default condition.**

The Gambling Commission Guidance takes the view that the conditions necessary for the general good conduct of gambling premises will be those set as default and mandatory conditions by the Secretary of State. Therefore a pool of additional conditions published by the Commission is not necessary. Where there are specific risks or problems associated with a particular locality or specific premises or class of premises the local licensing authority will be able to attach individual conditions to address this. Conditions imposed by the local licensing authority must be proportionate to the circumstances. Conditions must be:

- Relevant to the need to make the proposed building suitable as a gambling facility
- Directly related to the premises and the type of licence applied for
- Fairly and reasonably related to the scale and type of premises, and
- Reasonable in all other respect

### **Section 178 Door Supervision – this is a discretionary condition**

- (1) Where a condition for door supervision is attached to a premises licence (whether by virtue of section 167, 168 or 169) subsection (3) shall apply in relation to the licence.
- (2) In subsection (1) “condition for door supervision” means a condition requiring that one or more persons be responsible for guarding the premises against

unauthorised access or occupation, against outbreaks or disorder or against damage.

- (3) If the person carrying out the guarding mentioned in subsection (2) is required by the Private Security Industry Act 2001 (c. 12) to hold a licence under that Act authorising the guarding, the requirements under that Act shall be treated for the purpose of this Act as if it were a condition of the premises licence attached by virtue of this section.

**Note** – The Licensing Authority will have a discretion to decide whether door supervisors must be licensed by the Security Industry Authority (SIA).

### **Section 181 Betting Machines – this is a discretionary condition**

- (1) A condition of a betting premises licence may relate to –
  - (a) the number of machines used on the premises for the purpose of making or accepting bets;
  - (b) the nature of those machines;
  - (c) the circumstances in which those machines are made available for use.

**Note** – This provision only applies to “betting machines” which are different from “gaming machines” or “fruit machines”. A betting machine has a restricted meaning confined to the type of electronic point of sale machines used in betting shops to accept customers’ bets on real events.

APP 1

APPLICATION FORM

**Application for a premises licence  
under the Gambling Act 2005 (standard form)**

**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.

Where the application is—

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

**Part 1 – Type of premises licence applied for**

Regional Casino                       Large Casino                       Small Casino   
 Bingo                                       Adult Gaming Centre                       Family Entertainment Centre   
 Betting (Track)                       Betting (Other)

Do you hold a provisional statement in respect of the premises? Yes  No

If the answer is "yes", please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

**Part 2 – 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): \_\_\_\_\_

*[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]*

3. Applicant's address (home or business – *[delete as appropriate]*):

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.

*[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]*

**Section B**

**Application on behalf of an organisation**

6. Name of applicant business or organisation: METRO BET LIMITED

*[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence.]*

7. The applicant's registered or principal address:

260 SEVEN SLITERS ROAD  
FINSBURY PARK  
LONDON

Postcode: N4 2JA

8(a) The number of the applicant's operating licence (as given in the operating licence):

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:

13 APRIL 2007

9. Tick the box if the application is being made by more than one organisation.

*[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]*

**Part 3 – Premises Details**

10. Proposed trading name to be used at the premises (if known):

METROBET LIMITED

11. Address of the premises (or, if none, give a description of the premises and their location):

507 GREEN LANES  
HARINGEY  
LONDON

Postcode: N4 1TB

12. Telephone number at premises (if known): NK.

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

THE PREMISES ARE ON THE GROUND FLOOR OF A MIXED USE BLOCK WITH OFFICES ON THE SECOND LEVEL AND FLATS THEREAFTER ON THREE FLOORS

14(a) Are the premises situated in more than one licensing authority area?

Yes/No [delete as appropriate]

14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, **other than the licensing authority to which this application is made:**

**Part 4 – Times of operation**

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? Yes/No [delete as appropriate] [Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be no.]

15(b). If the answer to question 15(a) 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   | hh:mm | hh:mm  |                                   |
| Tue   |       |        |                                   |
| Wed   |       |        |                                   |
| Thurs |       |        |                                   |
| Fri   |       |        |                                   |
| Sat   |       |        |                                   |
| Sun   |       |        |                                   |

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates:



**Part 5 – Miscellaneous**

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued): 01/09/2024 (dd/mm/yyyy)

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? ~~Yes~~/No [delete as appropriate]

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application.

19(a). Do you hold any other premises licences that have been issued by this licensing authority? ~~Yes~~/ No [delete as appropriate]

19(b). If the answer to question 19(a) is yes, please provide full details:

20. Please set out any other matters which you consider to be relevant to your application:

PLEASE REFER TO METROBETS POLICY STATEMENTS ON THE 3 OBJECTIVES OF THE GAMBLING ACT 2005

**Part 6 – Declarations and Checklist (Please tick)**

I/ We confirm that, to the best of my/ our knowledge, the information contained in this application is true. I/ 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.

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

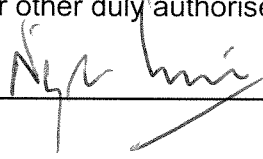
Checklist:

- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- 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 7 – Signatures**

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

Signature:



Print Name:

NIGEL SMITH

Date:

15/07/2007 (dd/mm/yyyy)

Capacity:

MANAGING DIRECTOR

22. 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:

*[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 21 and 22.]*

*[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]*

**Part 8 – Contact Details**

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

NIGEL SMITH

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted:

0870 876 9051 (W) 07710 588156

24. Postal address for correspondence associated with this application:

METROBET LIMITED  
260 SEVEN SISTERS ROAD  
FINCHBURY PARK  
LONDON

Postcode:

N4 2JA

25. 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:

N.SMITH@METROBET.CO.UK

**NOTICE OF APPLICATION FOR A PREMISES LICENCE (Form B)**

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

Notice is hereby given that the persons or organisations whose details are given in the Schedule to this notice have made an application for a **Betting (Other)** premises licence.

*[Insert here the kind of premises licence being applied for]*

The application relates to the following premises:

**Metrobet Limited, 507 Green Lanes, Haringey, London N4 1TB**

*[Give the trading name to be used at the premises, and the address of the premises (or, if none, give a description of the premises and their location).]*

The application for a premises licence has been made to the following licensing authority:

**Haringey Council, Civic Centre, High Road, Wood Green, London**

Postcode: **N22 8LE**

Website: **www.haringey.gov.uk**

*[Insert name of the licensing authority and the address of its principal office, followed by the address of its website]*

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:

**Nigel Smith 0870 850 9051**

*[This entry is optional and is to be included if the applicant wishes to provide the name, telephone number and (if available) e-mail address of a person connected with the applicant who is able to answer questions and provide further information about the application.]*

**Any representations under section 161 of the Gambling Act 2005 must be made no later than the following date: 14/8/2008**

*[Please insert last day on which representations may be made in relation to the application. The period for making representations is 28 days (inclusive) starting with the day on which the application for the premises licence was made to the licensing authority.]*

## Schedule of Applicants

The persons or organisations making the application are as follows:

Name of 1<sup>st</sup> Applicant: **Metrobet Limited**

*[Give the full name of the applicant as set out in Part 2 of the application for a premises licence is more than one applicant]*

Address of 1<sup>st</sup> Applicant:

**260 Seven Sisters Road, Finsbury Park, London**

Postcode: **N4 2JA**

*[Give the full address of the applicant as set out in Part 2 of the application for a premises licence]*

The number of the operating licence held by 1<sup>st</sup> Applicant is:

The 1<sup>st</sup> Applicant applied for an operating licence on **13 April 2007**

*[Delete as appropriate. Insert the reference number of the applicant's operating licence (as set out in the operating licence). Where an application for an operating licence is in the process of being made, indicate the date on which the application was made.]*

Name of 2<sup>nd</sup> Applicant:

*[Give the full name of the applicant as set out in Part 2 of the application for a premises licence is more than one applicant]*

Address of 2<sup>nd</sup> Applicant:

Postcode:

*[Give the full address of the applicant as set out in Part 2 of the application for a premises licence]*

The number of the operating licence held by 2<sup>nd</sup> Applicant is:

The 2<sup>nd</sup> Applicant applied for an operating licence on

*[Delete as appropriate. Insert the reference number of the applicant's operating licence (as set out in the operating licence). Where an application for an operating licence is in the process of being made, indicate the date on which the application was made.]*

***[Where there are more than two applicants, also give the same information for the other applicants.]***

**Metrobet Limited**

**Gambling Act 2005**

**Policy Statements**

The Gambling Act 2005 has three key objectives

1. Keeping gambling crime and disorder free
2. Making sure that gambling is fair and open
3. Protecting children and vulnerable adults

**1. Keeping Gambling Crime and Disorder Free**

- The Company will not employ any director, senior manager or employee with a criminal record.
- The Company will not accept any shareholder, any director or shareholder of which, has been convicted of a criminal offence.
- The Company will not accept loans or similar from any organisation which is not a recognised bank or lending institution, regulated by the Financial Services Authority.
- All staff employed will be employed on the basis of CVs and at least two referees, including one reference from a business employer if the employee has previously been employed in a gambling business.
- The Company will not tolerate disorderly behaviour, including consumption of alcohol or drugs, on its premises. This policy must be rigorously enforced by managers. Staff must not, however, take personal risks in enforcing this policy but ask for the assistance of the police where necessary.

**2. Conducting Gambling in a Fair and Open Way**

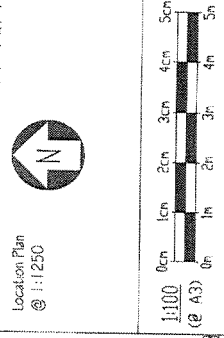
- The Company has adopted extensive rules to ensure that betting in shops is conducted in a fair and open way. These rules must be on open display in the shop.
- Where a dispute arises, the customer must be politely and courteously informed of our rules. If this does not settle the dispute, full details of the dispute must be relayed to the Head Office for its consideration. In the event that a customer is still not satisfied, he must be informed that he may take the complaint to the Chief Executive Officer of the Company for his consideration. Any customer may ultimately take any dispute to the Independent Betting Arbitration Service whose decision, the Company will observe.

**3. Protection of Children and Vulnerable Adults**

- The Company has a social and legal responsibility to ensure that children and vulnerable adults are protected from gambling.
- No under 18's are allowed to bet in shops. Any customers who appear to be under the age of 21 should be asked for photographic proof of identity. Signs to this effect must be placed on entrance doors, adjacent to fixed odds betting terminals and on counters.
- Managers must take care not to allow vulnerable persons, namely persons who may appear to be incapable of responsible gaming, to bet in shops. This is a matter of great

sensitivity and judgment and must be approached carefully so as not to appear to be discriminatory.

- Managers who identify potential problem gamblers should inform them about Gamcare where they may get the help they require. Managers may also implement requests from customers for self exclusion so that customers who experience problems can exclude themselves at their request. Any such request should be logged at the shop concerned and head office informed.
- Gamcare contact details and leaflets must be prominently displayed in shops, including areas adjacent to fixed odds betting terminals.



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| No. | Date | Description | Drawn |
|-----|------|-------------|-------|
|     |      |             |       |
|     |      |             |       |
|     |      |             |       |

**Kingsley Symes & Scott**  
Chartered Building Surveyors  
& Architectural Consultants

10 The Parade, Brighton Road,  
Burgess Heath, Surrey, KT20 6AT

Tel: 01737 373200 Fax: 01737 373660  
E-mail: mail@kingsleysymesandscott.co.uk  
Website: www.kingsleysymesandscott.co.uk

**RICS**

Project: 307 GREEN LANES  
LONDON  
N4 1TB

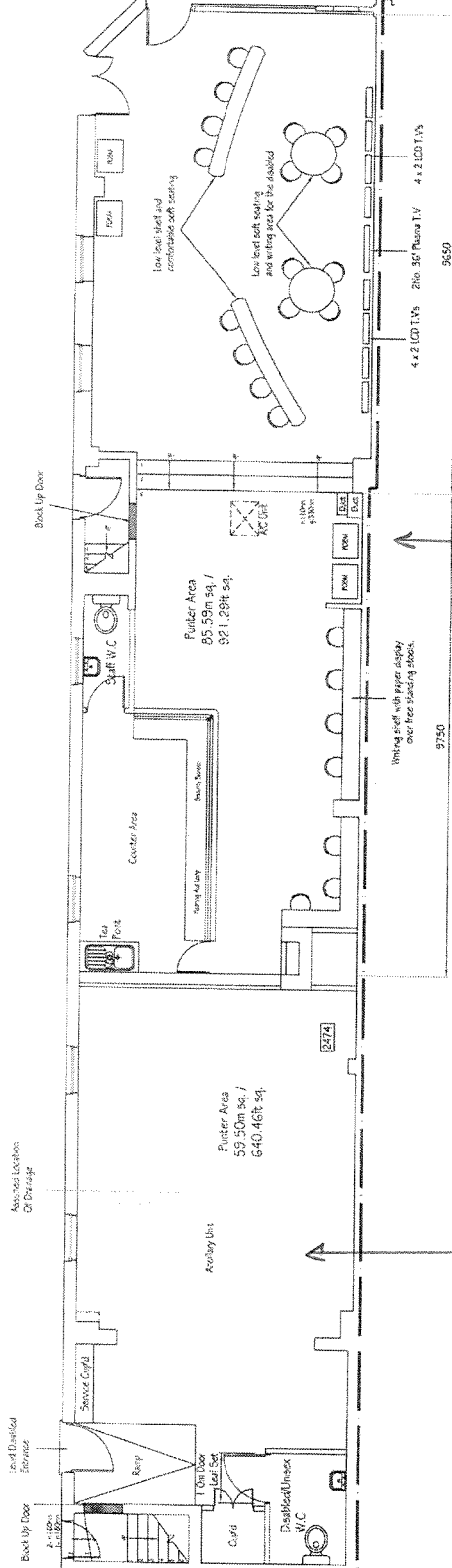
Client: METROBET

File: PROPOSED GROUND & FIRST FLOOR

Scale: 1:100 @ A3  
Drawn: EN  
Date: 24.04.07

Drawn by: G.S.M/S.P.

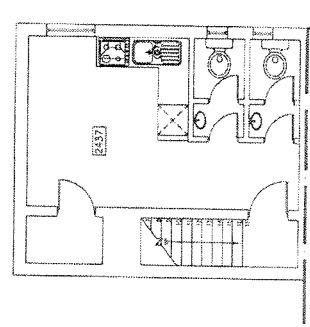
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GROUND FLOOR

THIS AREA CLOSED TO CUSTOMERS

FORM = FIVE 60S BETTING MACHINES



FIRST FLOOR

# GAMBLING COMMISSION

Mr P. Smith  
260 Seven Sisters Road  
London  
N4 2JA

31<sup>st</sup> August 2007

Dear Mr Smith,

**Re: Your application for a General Betting Standard Category C Licence, OL00797.**

Further to my recent letter advising you that the Gambling Commission had granted your application, the General Betting Standard Category C licence is now enclosed.

Please check the licence to ensure that all the details shown are correct. In the event of any inaccuracies please return the licence immediately indicating where the error(s) lies.

Please ensure that you read and fully understand the functions and/or activities authorised under the licence together with the conditions and codes and that you make the necessary arrangements to comply with these.

If you have any queries relating to the licence or the Annual Fee then please contact the Gambling Commission on the phone number below

Please note that your Annual fee of £12,645.00 is due for payment on 30 September 2007.

Yours sincerely



Director of Licensing and Compliance

Victoria Square House  
Victoria Square  
Birmingham B2 4BP

T 0121 230 6500  
[www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)





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**Town and Country Planning Act 1990 (As amended)**  
**Plan relating to the Enforcement Notice dated**  
**507 Green Lanes N4**

*OTHER BETTING PREMISES FIVE IN GREEN LANE*

**\* HARINGEY COUNCIL \***  
**Directorate of Environmental Services**

Robin Payne  
 Assistant Director  
 Enforcement Service  
 639 High Road  
 London N17 8BD  
 Tel 020 8489 0000  
 Fax 020 8489 5525

|  |          |                  |
|--|----------|------------------|
|  | Drawn by | Haringey Council |
|  | Scale    | 1:1250           |
|  | Date     | 08/08/2007       |
|  | Drawing  | N/A              |

## APP 2

# CODES OF PRACTICE FOR NON REMOTE GAMBLING

# GAMBLING COMMISSION

Typical Licence Conditions and Codes of Practice for:  
**Non-Remote General Betting Operators**  
(on and off course bookmakers)  
August 2007

## Contents

|                                                                                                  |    |
|--------------------------------------------------------------------------------------------------|----|
| Introduction                                                                                     | 3  |
| Part I: Gambling Commission General Licence Conditions                                           | 4  |
| <b>Licence Conditions applicable to providing facilities for betting other than pool betting</b> |    |
| 1 Personal licences and qualified persons                                                        | 4  |
| 3 Financial robustness                                                                           | 5  |
| 4 Protection of customer funds                                                                   | 5  |
| 5 Cash handling                                                                                  | 5  |
| 7 General fair and open provisions                                                               | 5  |
| 14 Access to premises                                                                            | 6  |
| 15 Information requirements                                                                      | 6  |
| Part II: Gambling Commission Codes of Practice                                                   | 7  |
| <b>Codes of Practice applicable to providing facilities for betting other than pool betting</b>  |    |
| 1 Financial requirements                                                                         | 7  |
| 2 Protection of children and other vulnerable persons                                            | 7  |
| 3 Fair and open provisions                                                                       | 12 |
| 4 Marketing                                                                                      | 14 |
| 5 Complaints and disputes                                                                        | 14 |
| 6 Gambling licensees' staff                                                                      | 15 |

## Introduction

The Gambling Act 2005 (the Act) creates new arrangements that govern the way organisations and individuals involved in gambling can operate. From September 2007, most operators who wish to run a gambling business in Britain, and certain key individuals, need to be licensed by the Commission. There are some exemptions. The Commission has developed general licence conditions and codes of practice that govern how gambling facilities are provided and managed and gambling conducted.

This document sets out an example of the relevant conditions and code provisions for holders of a *Non-Remote General Betting* operating licence. It does not include statutory conditions, any licence conditions imposed by the Secretary of State or any conditions the Commission might attach solely to an individual licence.

This document is intended to be a general example only and does not replace the conditions and codes which will be attached to the operating and personal licences when these are issued. It should not be considered a definitive guide. However, this licensee-specific example will, we hope, aid operators' and stakeholders' understanding about the requirements on licensees.

Individual licence holders will receive copies of the conditions and codes which apply to their particular licence when their licence is issued to them. In some cases, the licence will set out individual conditions that are specific to that operator, based on the assessment of their licence application.

The Commission has powers to prosecute operators and can impose fines on operators who breach their licence conditions or social responsibility code of practice provisions, and can take breaches of the ordinary codes of practice into account as part of a prosecution. Licence conditions and social responsibility codes of practice detail the legal obligations attached to holding an operating licence. Ordinary codes of practice detail the manner in which facilities for gambling should be provided.

Part I of this documents sets out the Licence Conditions.

Part II of this document sets out the relevant provisions of the code of practice. The text in shaded boxes comprises the 'social responsibility provisions' and covers issues including the promotion of responsible gambling and marketing. The text that is not shaded which is titled 'ordinary code provisions' covers issues including the employment of children and young people and age verification.

Where a Condition or Code provision appears in the full [Licence Conditions and Codes of Practice](#) but does not apply for this type of licence, it has not been reproduced here. Where this is the case, there may gaps in the sequential numbering of the individual conditions.

You can obtain copies of this document and the other documents mentioned above from the Commission's website, [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk) or by writing to:

Gambling Commission  
Victoria Square House  
Victoria Square  
Birmingham B2 4BP

T 0121 230 6666

F 0121 230 6720

E [info@gamblingcommission.gov.uk](mailto:info@gamblingcommission.gov.uk)

## Part I: Gambling Commission General Licence Conditions

### Licence Conditions applicable to providing facilities for betting other than pool betting

#### 1 Personal licences and qualified persons

##### Operating licences issued to small-scale operators

In this condition the terms 'small-scale operator', 'qualifying position' and 'qualified person' have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.

Schedule X<sup>1</sup> lists those individuals notified to the Commission as qualified persons.

If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under s104(1)(b) for amendment of the details of the licence set out in Schedule X<sup>1</sup>.

An application for amendment under s104(1)(b) may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.

Schedule Y<sup>1</sup> to this licence lists those of the licensee's employees whose details have been provided to the Commission as authorised by the licensee to accept bets on the licensee's behalf on a track otherwise than under the supervision of a qualified person present on the same track.

Should the licensee wish to add an individual to the list or remove the name of an individual from the list the licensee must make application to the Commission under s104(1)(b) for amendment of that detail of the licence. Any employee the licensee wishes to add to the list may act unsupervised pending amendment of the licence provided a valid amendment application has been lodged with the Commission.

In this condition 'qualified person' has the same meaning as in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.

#### 1.2 Personal licences

(a) Subject to (e) and (f) below licensees must ensure:

(i) that each individual who occupies one of the management offices specified in (b) below in or in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter 'a personal management licence'); and

(ii) that at least one person occupies at least one of those offices.

(b) The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:

- the overall management and direction of the licensee's business or affairs;
- the licensee's finance function as head of that function;
- the licensee's gambling regulatory compliance function as head of that function;
- the licensee's marketing function as head of that function;
- the licensee's information technology function as head of that function in so far as it relates to gambling-related information technology and software; or
- oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area.

---

<sup>1</sup> The schedules mentioned here will be attached to individual licences.

(c) Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder's personal management licence.

(d) Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual's work and any requirements of the Commission in respect of such matters applicable during the period of the review.

(e) Paragraphs (a) to (d) above shall not apply to a licensee for so long as the licensee is a 'small-scale operator' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 ('the Regulations').

(f) During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs (a) to (e) above shall apply subject to the proviso that the phrase 'each individual' in paragraph (a)(i) shall not include any individual who was a 'qualified person' (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

### 3 Financial robustness

All company licensees must notify the Commission of the name and address of any person who becomes a shareholder in the company or its holding company holding 3% or more of the issued share capital of the company or its holding company; or any existing shareholder who acquires a holding of 3% or more of the issued share capital of the company or its holding company.

In this condition 'holding company' has the meaning ascribed to that term by section 736 of the Companies Act 1985 (as amended).

### 4 Protection of customer funds

Licensees who hold customer funds for use in future gambling must set out clearly, in information made available to customers in writing, whether they protect customers funds in the event of insolvency and the method by which this is achieved.

### 5 Cash handling

Licensees, as part of their internal controls and financial accounting systems, must have in place and follow written policies and procedures concerning the handling of cash, and cash equivalents (ie bankers drafts, cheques and debit cards), designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit and to provide assurance that gambling activities are being conducted fairly.

### 7 General fair and open provisions

Licensees must satisfy themselves that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977.

An accurate summary of the contractual terms on which gambling is offered must be made available to customers and set out in plain and intelligible language.

Customers must be notified of changes to terms before they come into effect.

## 14 Access to premises

Licensees must have in place and implement written policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act.

## 15 Information requirements

### 15.1 Reporting suspicion of offences etc

Licensees must provide the Commission with any information that they suspect may:

- relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition; or
- lead the Commission to consider making an order to void a bet.

Licensees who accept bets, or facilitate the making or acceptance of bets between others, on the outcome of horse races or other sporting events governed by one of the sport governing bodies for the time being included in Part 3 of Schedule 6 to the Act must also provide the relevant sport governing body with any information the licensee suspects may:

- lead the Commission to consider making an order to void a bet; or
- relate to a breach of a rule applied by that sport governing body.

### 15.2 Reporting 'Key Events'

Licensees must notify the Commission of the occurrence of any of the following key events as soon as reasonably practicable and in any event within 5 working days of its occurrence:

- in the case of licensees which are companies, their (or any group company of theirs) being placed in liquidation, administration or receivership: in this condition a 'group company' is any subsidiary or holding company of the licensee – as those terms are defined in s736 Companies Act 1985 or any statutory modification or re-enactment thereof – and any subsidiary of such holding company;
- in the case of a licensee who is an individual (or a partner in a partnership licensee) their becoming bankrupt within the meaning of section 381 of the Insolvency Act 1986 or sequestration of their estate under section 12(1) of the Bankruptcy (Scotland) Act 1985;
- where the licensee is required to have its accounts independently audited, any unplanned change of auditor including a change prompted by a dispute or resulting from auditors being unable or unwilling to sign an audit certificate;
- the departure from the licensee's business of any holder of a personal management licence, other than those with oversight of the day to day management of licensed premises of a licensee operating more than 4 licensed premises;
- any reduction in the licensee's employed staff by more than 10% provided that represents at least 3 individuals;
- the acquisition or disposal of gambling premises or pitches;
- in the case of corporate licensees, the disposal or acquisition of any group company;
- the disposal of assets to the value of 10% or more of the licensee's total net assets;
- any breach of a covenant given to a bank or other lender;
- any default in making repayment of the whole or any part of a loan on its due date;
- any court judgments remaining unpaid 14 days after the date of judgment;
- the commencement of any material litigation against the licensee;
- any instance of internal or external fraud or theft involving a sum in excess of £10,000; and
- the commencement of disciplinary action against the holder of a personal licence where the licence holder is suspended or serious misconduct is alleged.



## 15.3 General and Regulatory Returns

On request, licensees must provide the Commission with such information as the Commission may require about the use made of facilities provided in accordance with this licence, and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on, including in particular information about:

- the numbers of people making use of the facilities and the frequency of such use;
- the range of gambling activities provided by the licensee and the numbers of staff employed in connection with them; and
- the licensee's policies in relation to, and experiences of, problem gambling.

In particular, within 28 days of the end of each quarterly or annual period as the case may be, licensees must submit a Regulatory Return to the Commission containing such information as the Commission may from time to time require<sup>2</sup>.

## Part II: Gambling Commission Codes of Practice

### Codes of Practice applicable to providing facilities for betting other than pool betting

#### 1 Financial requirements

##### Ordinary code provision

As part of their procedures for compliance with the requirements in respect of the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should:

- unless there is a specific reason not to do so, appoint one or more nominated officers whose duty it is to take overall responsibility for the anti-money laundering procedures within the operation, in particular with respect to Suspicious Activity Reporting;
- ensure, through appropriate training and guidance, that all staff who handle money or accounts or accept bets are aware of their duties under anti-money laundering legislation to report all suspicious activity to the nominated officer in a timely manner or, where there is no such nominated officer, directly and promptly to the police. It is the nominated officer's duty to consider such reports and to forward them where appropriate to the Serious Organised Crime Agency; or
- adopt (or reflect in their procedures) the Association of British Bookmakers' guidelines.

#### 2 Protection of children and other vulnerable persons

##### 2.1 Combating problem gambling

###### Social responsibility code provision

Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling.

Licensees' policies and procedures for socially responsible gambling must include but need not be confined to:

- the specific policies and procedures required by the following provisions of section 2 of this code;
- a commitment to and how they will contribute to research into the prevention and treatment of problem gambling;

<sup>2</sup> The current forms of the sector specific returns and guidance notes for their completion are available on the Commission's website [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk) and can also be obtained by writing to the Commission at Victoria Square House, Victoria Square, Birmingham B2 4BP.

- a commitment to and how they will contribute to public education on the risks of gambling and how to gamble safely; and
- a commitment to and how they will contribute to the identification of and treatment of problem gamblers.

## 2.2 Access to gambling by children and young persons

### Social responsibility code provision

Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.

This must include procedures for:

- checking the age of apparently underage customers;
- removing from adult only licensed premises anyone who appears to be underage who tries to access the gambling facilities and cannot produce an acceptable form of identification;
- taking action when there are attempts by under-18s to enter adult only premises;
- refusing entry to any adult-only area of a track to anyone unable to produce an acceptable form of identification; and
- taking action when there are unlawful attempts to enter the adult-only areas.

Licensees must not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.

In premises restricted to adults, service should be refused in any circumstances where any adult is accompanied by a child or young person.

Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This should include appropriate training which must cover the legal requirements on returning stakes and not paying prizes to underage customers.

Licensees must only accept identification which:

- contains a photograph from which the individual can be identified;
- states the individual's date of birth;
- is valid; and
- is legible and has no visible signs of tampering or reproduction.

### Ordinary code provision

The Commission considers acceptable forms of identification to include any identification carrying the PASS logo (eg Citizencard, Validate and the Government's own Connexions card); a driving licence (including a provisional licence) with photocard; and a passport.

Licensees should implement procedures that require their staff to check the age of any customer who appears to them to be under 21.

Licensees should consider permanent exclusion from premises for any adult accompanied by a child or young person on more than one occasion to premises restricted to adults, or if there is reason to believe the offence was committed knowingly or recklessly.

Procedures should be in place for dealing with cases where a child or young person repeatedly attempts to gamble on premises restricted to adults, including oral warnings, reporting the offence to the Gambling Commission and the police, and making available information on problem gambling.

## 2.3 Information on how to gamble responsibly and help for problem gamblers

### Social responsibility code provision

Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about and help in respect of problem gambling.

Licensees must take all reasonable steps to ensure that this information is readily accessible including in locations which enable the customer to obtain it discreetly.

For gambling premises this should include:

- information in the gambling area, near gaming machines and near to where ATMs are located; and
- posters, or leaflets that may be collected discreetly and taken away, in other areas (eg toilets and near to exit doors).

The information must be prominent, and appropriate to the size and layout of the premises.

The information must cover where relevant:

- the availability of measures that are accessible to help an individual monitor or control their gambling, such as to restrict the duration of a gambling session or the amount of money they can spend;
- the availability of timers or any other forms of reminders or 'reality checks' that may be available;
- self-exclusion options; and
- information about the availability of further help or advice.

The information must be directed to all customers who wish to enjoy gambling as entertainment and not be targeted only at those the operator perceives to be 'problem gamblers'.

### Ordinary code provision

Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:

- the information on how to gamble responsibly and access to help referred to above;
- the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code; and
- the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

## 2.4 Customer interaction

### Social responsibility code provision

Licensees must implement policies and procedures for customer interaction where they have concerns that a customer's behaviour may indicate problem gambling. The policies must include:

- identification of the appropriate level of management who may initiate customer interaction and the procedures for doing so;
- the types of behaviour that will be logged/reported to the appropriate level of staff and which may trigger customer interaction at an appropriate moment;
- the circumstances in which consideration should be given to refusing service to customers and/or barring them from the operator's gambling premises; and
- training for all staff on their respective responsibilities, in particular so that they know who is designated to deal with problem gambling issues.

But such policies and procedures should be consistent with, and implemented with due regard to, licensees' duties in respect of the health and safety of their staff.



## 2.5 Self-exclusion

### Social responsibility code provision

Licensees must put in place procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.

Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.

Licensees must take all reasonable steps to prevent any marketing material being sent to a self-excluded customer as soon as practicable. This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.

Licensees must close any customer accounts of an individual who has entered a self exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.

Licensees must implement procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling; and which include:

- a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
- photo identification (where available and in particular where enforcement of the system may depend on photographic ID), and a signature;
- staff training to ensure that staff are able to enforce the systems; and
- the removal of those persons found in the gambling area or attempting to gamble from the premises.

### Ordinary code provision

Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.

Wherever practicable, individuals should be able to self-exclude without having to enter gambling premises.

Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.

Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.

Licensees should encourage the customer to consider extending their self exclusion to other licensees' gambling premises in the customer's local area.

Customers should be given the opportunity to discuss self-exclusion in private, where possible.

Licensees should take all reasonable steps to ensure that:

- the self-exclusion period is a minimum of six months and give customers the option of extending this to a total of at least five years;
- a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups) the customer may return at a later date to enter into self-exclusion;
- at the end of the period chosen by the customer (and at least six months later), maintain the self-exclusion in place, unless the customer takes positive action in order to gamble again. No marketing material may be sent to the individual unless the individual has taken positive action in order to gamble again, and has agreed to accept such material; and
- where a customer chooses not to renew, and makes a positive request to begin gambling again, give the customer one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person.

(Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.)

## **2.6 Employment of children and young persons**

### **Ordinary code provision**

Licensees who employ children (under-16s) and young persons (those aged 16 and 17) should be aware that it is an offence:

- a) to employ children to provide facilities for gambling in connection with football pools;
- b) otherwise to employ children and young persons to provide facilities for gambling
- c) if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time; and
- d) to employ them to carry out any other function on betting licensed premises while any gambling activity is being carried on in reliance on the premises licence.

As to (c) it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.

Accordingly, licensees should have policies and procedures designed to ensure that:

- children and young persons are never asked to perform tasks within (a) or (b) above;
- all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons;

and should consider adopting a policy that:

- children and young persons are not employed to work on betting licensed premises at any time when the premises are open for business; and
- gaming machines are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

## 2.7 Provision of credit by licensees and the use of credit cards

### Social responsibility code provision

Licensees who choose to accept credit cards must:

- accept payment by credit card for gambling only where that payment is made to a customer account; and
- make available for gambling, funds deposited via credit card only after the card issuer has approved the transaction.

### Ordinary code provision

Licensees who choose to offer credit to members of the public who are not themselves gambling operators should also:

- have procedures for checking and scoring applications for credit from such customers, for setting, and for the increase of, credit limits;
- explain these procedures to customers;
- set a maximum credit limit for each customer and not permit customers to exceed that limit without further application;
- apply a 24-hour delay between receiving a request for an increase in a credit limit and granting it in those cases where the limit exceeds that which the operator had previously set;
- not require a minimum spend within a set time period;
- take reasonable steps to ensure that offers of credit are not sent to vulnerable persons, including those who have self-excluded from gambling; and
- ensure that information about an offer of credit includes a risk warning of what may happen in the event of default.

## 2.8 Money lending between customers

### Ordinary code provision

Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

## 3 Fair and open provisions

### Social responsibility code provision

Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

### Social responsibility code provision

Licensees must set out within the full rules that they make available, the core elements for the acceptance and settlement of bets. These rules must cover:

- the circumstances under which the operator will void a bet;
- treatment of errors, late bets and related contingencies;
- availability of odds for any ante-post, early show or starting price betting, and treatment of place, forecast bets etc;

- treatment of withdrawals, non-runners, and reformed markets;
- maximum payout limiting liability for a specific betting product or generally;
- any charges made to customers for the use of betting services or products, and how these are calculated (including deductions from winnings for commission, or in respect of withdrawn horses etc);
- means or medium by which the outcome of an event will be determined;
- the rules for the event itself to be specified (eg horserace bets only to be accepted where the racing is subject to Horseracing Regulatory Authority rules);
- where bets are accepted on 'pari-mutuel' terms; and
- any special arrangements for settling bets on 'coupled' horses.

Where special rules have been agreed in relation to a particular bet these must not be overridden by any conflicting rules or subsequent rule changes.

Licensees must issue betting slips or an electronic acknowledgement (other than in the case of telephone betting) for each transaction which include information as to the operator's name and contact details, and words equivalent to 'Bets are accepted in accordance with the operator's rules'.

### **Social responsibility code provision**

In their terms on which bets may be placed (required to be displayed in accordance with mandatory conditions attaching to their premises licences) licensees must give prominence to their rules concerning voiding, late bets and maximum payouts.

When providing facilities for betting on-course, licensees must display on their 'joints' in an intelligible format:

- any rules that differ from Tattersalls' 'Rules on Betting' or the British Greyhound Racing Board's 'Regulations for the conduct of on-course bookmaking' as applicable<sup>3</sup>;
- any types of unorthodox bets accepted (such as forecast betting, betting without the favourite, distance betting etc);
- whether win-only or each way bets are accepted;
- any concessions or bonuses offered;
- all of the runners and the odds available to the public;
- the operator's trading name and contact address;
- the minimum bet accepted; and
- the maximum guaranteed liability.

Licensees operating within the ring at horserace tracks must issue customers with a betting slip or ticket for each transaction accepted. Betting slips or tickets must include the following information:

- operator's name and contact details;
- race day name or code, date and race number;
- name and/or number of the selection;
- the stake and potential return;
- the odds, or whether the bet will be settled according to the Starting Price;
- the type of bet.

Any special rules which have been agreed in relation to a particular bet must not be overridden by any conflicting rules or subsequent rule changes.

<sup>3</sup> The references to Tattersalls' 'Rules on Betting' and the British Greyhound Racing Board's 'Regulations for the conduct of on-course bookmaking' reflect the current position and may need to be amended in future.



### Ordinary code provision

Where licensees offer to accept bets, or facilitate the making or acceptance of bets between others, on the outcome of a sport regulated by a sport governing body for the time being included in Part 3 of Schedule 6 of the Act they should take all reasonable steps to familiarise themselves with the rules applied by that body.

## 4 Marketing

### Social responsibility code provision

If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:

- a) the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to customers;
- b) neither the receipt nor the value or amount of the benefit is:
  - (i) dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
  - (ii) dependent on the amount the customer spends on gambling within a predetermined length of time which is shorter than the whole of the period during which the particular benefit is made available;
- c) if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
- d) if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.

### Ordinary code provision

Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

### Ordinary code provision

Licensees should comply with the advertising codes of practice which apply to the form and media in which they advertise their gambling facilities or services.

## 5 Complaints and disputes

### Social responsibility code provision

Licensees must put in place a written procedure for handling customer complaints and disputes.

In this code a 'complaint' means a complaint about any aspect of the licensee's conduct of the licensed activities, and a 'dispute' is any complaint which:

- a) is not resolved at the first stage of the complaints procedure; and
- b) relates to the outcome of the complainant's gambling transaction.



Licensees must ensure that:

- customers are told the name and status of the person to contact about their complaint;
- customers are given a copy of the complaints procedure on request or on making a complaint; and
- all complaints are handled in accordance with the procedure.

Licensees must also ensure that customers whose disputes are not resolved to their satisfaction by use of the complaints procedure may refer them to an independent third party. The arrangements under which such complaints are referred may, but need not, provide for the third party's decision be binding on the licensee and the customer.

Licensees must keep a record of all complaints that are not resolved at the first stage of the complaints procedure.

Licensees must arrange for a copy of the decision on, or a note of the outcome of, each dispute referred to the independent party to be provided to the Commission quarterly, either by the independent party or by the licensee.

## 6 Gambling licensees' staff

### **Social responsibility code provision**

Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

Gambling Commission August 2007

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The Gambling Commission regulates gambling in the public interest. It does so by keeping crime out of gambling, by ensuring that gambling is conducted fairly and openly, and by protecting children and vulnerable people from being harmed or exploited by gambling. The Commission also provides independent advice to government on gambling in Britain.

For further information or to register your interest in the Commission please visit our website at: [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

Gambling Commission  
Victoria Square House  
Victoria Square  
Birmingham B2 4BP

T 0121 230 6500  
F 0121 230 6720  
E [info@gamblingcommission.gov.uk](mailto:info@gamblingcommission.gov.uk)

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APP 3

LETTERS OF REPRESENTATION  
FROM INTERESTED PARTIES  
INCLUDING TRADE  
REPRESENTATIONS

13-8-07  
Money  
Thanks

FAO - Dalila Barnett

Licensing Team

1 x slip

7 x pages petition - 51 signatures

hand-copy of  
letter in post

M Petrov  
P.O. Box 265129

MS 30F

tel/fax 83521020

51  
+ 122 previous  
173 total

+ petition signatures sent in by others = Grand Total = ?

## PROTECT OUR COMMUNITY'S CHILDREN AND VULNERABLE PEOPLE FROM EXPOSURE TO BETTING PREMISES

I/we the following undersigned, residents and traders, very strongly oppose the granting of a "betting (other) premises licence" at 507 Green Lanes N4 1TB to Metrobet Ltd.

The location of 507 Green Lanes, directly opposite Harringay's main post office by the junction with Warham Road, is just around the corner from South Harringay Primary school and nearby Woodlands Park Nursery. Many of our vulnerable people use the crown post office directly opposite 507 Green Lanes, as do families.

It is unacceptable and outrageous that our community's young children and most vulnerable citizens could be overly exposed to an activity only adults can lawfully indulge. It is also unfair, underhanded and despicable that the single public notice advertising this application was not displayed until 23<sup>rd</sup> July (after the schools close) and the period to comment finishes on 14<sup>th</sup> August (before they reopen). It would be wholly inappropriate, and a crime (which we have an unenviable record and serious problem) against our community, were this damaging application, which threatens social cohesion, to be granted approval.

| NAME               | ADDRESS                               |
|--------------------|---------------------------------------|
| Ms BRESAN TUNA Bin | 495 Green lanes N4 1AN                |
| Mrs. Zilker Has    | 191 Nightingale Road H18              |
| M Mikail HAZAR     | Green lanes road                      |
| Mrs Elif Kaya      | 12 Coleman Mansions Crouchhill N8 9EJ |
| Mr. M. Mehmet      | 2 BRADWICK ROAD                       |
| Mr. I Zekioglu     | 29 Federation Road SE2 0JT            |
| Mr. E. Zekioglu    | 29 Federation Road SE2 0JE            |
| M. Tezel           | 41 Borwick Avenue                     |
| H. Eskuram         | 326 St Ann's Road                     |
| K. Halik           | DYNEVOR ROAD                          |

Please send this petition to:

Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

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| NAME                 | ADDRESS                       |
|----------------------|-------------------------------|
| <i>Mrs. S. Akbar</i> | KYNASTON R.D N16              |
| Mr. A. S. AKBAR      | 348, St. Ann's Rd. N15 3TA    |
| Mr. Hasem            | 1.000 REGENT'S.               |
| G COSTA              | 29 WILLOWBY RD N8 5TE         |
| S. Syed              | 87 Thetford close N13 6AU.    |
| DAPHNE TIBBS         | 20 BERTRAM STREET N19 5DQ     |
| LOUISA TIBBS         | 20 BERTRAM ST. N19 5DQ        |
| J. Husayin           | 45 McCall Hse N7 0PT.         |
| S. DAVIES            | FABET St. - C8'               |
| R. Peacock           | FIAT 201 MERLIN HSE, EN3 4QW- |

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| NAME           | ADDRESS                     |
|----------------|-----------------------------|
| N. Peeroo      | FLAT 201 MORUN HSG.         |
| I. Paulos      | 64 Lealand Rd. N.15 6J7.    |
| Rabiye         | 26 B Park Avenue N22 7EX    |
| Oshokoye       | 30 Holland Rd N17 6HE       |
| Huseyin ULUSOY | 18 - Reynardson Rd. N17 7DX |
| LEFTERIS GEORG | 88 ROYAL COLLEGE ST         |
| C TECCHIO      | 8 MASSIE ROAD E8            |
| H Saleh        | 124 Wightman R N4 1RL       |
| F. Shukru      | 9 Brick Lane Enfield.       |
| S Solis        | 107 Perth Rd N22 5QG.       |

Please send this petition to:

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| NAME                  | ADDRESS                                            |
|-----------------------|----------------------------------------------------|
| GEORGE EDWARD ROBERTS | 66 FADE RD<br>HARINGAY<br>LONDON N4 1DH            |
| Susanna Fortune       | The Garden Ladder<br>501 Green Lanes London N4 1AL |
| Simon Walters         | 501A GREEN LANES, LONDON, N4 1AL                   |
| Ronald Ford           | 5 UNPRELUCE LONDON N4 1RY                          |
| Bernie Gray           | 5 UNPRELUCE ROAD, N4 1RY                           |
| T.P. JOLLEY           | 50, WOODLANDS PK RD, N15 3RX                       |
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| NAME          | ADDRESS               |
|---------------|-----------------------|
| J. Wainwright | 106 PEMBERTON RD NH   |
| M. Petrov     | PO BOX 45129, N15 3XF |
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| NAME                 | ADDRESS                  |
|----------------------|--------------------------|
| Ruthie Campbell Hill | 35 Warham Rd N4 1AR      |
| Maggie Elmore        | 595 Green Lanes N8 OR8   |
| Renee Thomas         | 35 Warham Rd, N4 1AR     |
| J.R. G. Smith        | 599. Green Lane N8 - OR8 |
| J. Whyte             | 1 Warham Rd N15 5AR      |
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| NAME        | ADDRESS                 |
|-------------|-------------------------|
| G Winston   | 69 Baresford Rd N8      |
| R. S. Patel | 491 GREEN LANES N4      |
| R. Walker   | 27 Warham Rd N4         |
| T. LECLAIR  | 70 KIMBERLEY GARDENS N4 |
| McGUINN     | 161, WIGHTMAN Road N4   |
| CICININ     | 120 Pemberton Rd N4     |
| P. Patel    | 491, Green Lanes N4 1AL |
| PETER Q.    | 8. SALISBURY ROAD N4    |
|             |                         |
|             |                         |

Please send this petition to:  
Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

FAO - Palina Barnett  
Licensing Team  
1 X Slip  
1 X Page

To supersede  
previous  
representation

From: Mario Petrov  
8352 1020

Ms D. Barrett  
 Licensing Team  
 Civic Centre  
 Wood Green N22  
 11-8-07

Mario Petrov  
 Po Box 45129  
 London N15 3XF  
 tel/fax 8352 1020

Re: Betting (other) Premises License - 507 Queen Lanes N4

Dear Sir

I very strongly object to the granting of a 'betting (other) premises license' for 507 Queen Lanes N4 to M Petrov Ltd, on the grounds that it will overly expose our community's children & vulnerable people to an activity only adults can lawfully indulge, & one that is of dubious & highly contentious value as a positive contributor towards a cohesive community. Gambling is an activity that is highly offensive to the many locally established faith groups, & to non-gamblers, & is another reason to take into account.

Many families, vulnerable people & members of faith groups use the crown post office located directly opposite on the corner of the Queen Lanes/Wanham Road junction, & the proposal is just around the corner from South Harringay Primary School & nearby Woodlands Park Nursery, making an in-your-face impact on these significant & important sections of our community unavoidable.

The area has an existing number of gambling premises making monitoring difficult & which are a cause of concern, given the number, in terms of potential crime & disorder. As a consequence of the high number of these gambling establishments clustering together there is a danger of the locality proving to be an attraction to vulnerable people & to teenagers causing them to congregate & leading to anti-social behaviour, & crime & disorder.

Since 2002, when the area's serious problems were extensively reported in the national media, many residents, residents' groups & businesses, in partnership with the council, have worked tirelessly & significant resources have been invested to turn the area around to create a sense of cohesive community. I am now extremely concerned, & even frightened, that all this good work shall be undone.

Please do not grant a license for this proposal which seriously threatens our well-being & our chance for a normal life.

Thank you for your time & attention.

yours sincerely

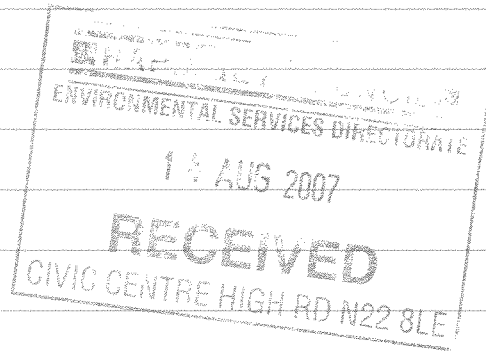
M Petrov

In addition, there was no consultation with the community & there seems to be some confusion about the timing of the display of the notice.

Two of the three Harringay ward councillors were uncertain whether they had been notified, the third was unable to be contacted. May I suggest that in response to the Gambling Act 2005 the council produces a weekly licensing list along the lines of the weekly planning list - for all, residential & other interested parties.

50A Salisbury Road  
Haringay  
London N4 1JZ  
12/08/07

Ms D. Barrett  
Licensing Team  
Civic Centre  
High Rd  
Wood Green  
London N22 8LE



Dear Ms Barrett,

I am really concerned that another betting shop may be granted a premises licence at 507 Green Lanes N4 1TE. There is already a Ladbrooke's premises diagonally opposite. Many children attend local schools in the area and walk along Green Lanes on their way. Do we really want our children to grow up thinking this is what we do with our money or rather what their fathers do with their wages. Where are the male role models, always is the betting shop?

There are many vulnerable people frequenting Green Lanes. At present there are several long time beggars regularly asking for money for the phone, a taxi, a meal, a drink etc and when we do believe the source of their request and hand over money, they go straight into the nearest betting shop. I have foolishly handed over money on a few occasions and witnessed the result. Why does the Council wish to put more temptation in the way of people who probably do not have enough money to cope with their family expenses or look after themselves.

Green Lanes is becoming a pleasant community shopping area. It used to be rather a run down dump. Why

## PROTECT OUR COMMUNITY'S CHILDREN AND VULNERABLE PEOPLE FROM EXPOSURE TO BETTING PREMISES

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| NAME           | ADDRESS              |
|----------------|----------------------|
| Rishma Shame   | No 55, Basement flat |
| Sally James    | No 73 PEMBERTON RD   |
| LESLIE KINNEAR | 29 PEMBERTON RD.     |
| RUTH MUNDY     | 89a PEMBERTON RD     |
| R TAYLOR       | 103a PEMBERTON RD    |
| J. Shah        | 115 Pemberton Rd     |
| John M. Pertin | 55 Pemberton Rd      |
| ANNE HANSON    | 16 SALISBURY RD N4   |
| Camela Emmeron | 50 Salisbury Rd      |
| Andrew Green   | 52 Salisbury Rd.     |

Please send this petition to:

Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

Rachel Cullen  
16e Grand Parade  
London  
N4

Licensing Team  
Environmental Services  
Civic Centre  
High Road  
Wood Green  
N22 8LE



8<sup>th</sup> August 2007

Dear Sir / Madam,

**License application for a Betting Shop, 507 Green Lanes**

I write to object to the current application by Metrobet to allow the above premises to be used as a betting shop.

There are already too many betting shops in the immediate area, including Ladbrokes on the corner of Green Lanes and Salisbury Road, almost immediately opposite. More will further detract from the area and there will be an increase in people loitering, litter and noise. I would prefer to see more shops or café's in the area.

I would, therefore, ask you to take my comments into account and request that the application is refused.

Yours sincerely

Rachel Cullen



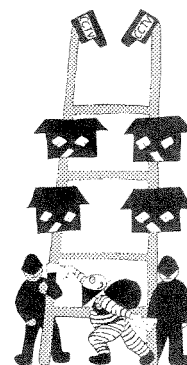
## LADDER COMMUNITY SAFETY PARTNERSHIP

*...keeping crime off*

Incorporating the Are You Sure? campaign.

P.O. Box 32109 London N4 1GN

Telephone: 07931 761 558



the "Ladder"



Daliah Barrett  
Environmental Control Service  
Civic Centre  
Wood Green  
London N22 8LE

9 August 2007

Dear Ms Barrett

### **Premises licence: Betting: 507 Green Lanes, N4 1TB**

The Ladder Community Safety Partnership (LCSP) contains representatives of Neighbourhood Watches and Residents' Associations from the 'Ladder' roads, adjacent to Green Lanes, Harringay, and from Wightman Road and Green Lanes itself. We are an independent group, although working in partnership with Haringey Council and the Metropolitan Police where appropriate.

We are writing to you as members of the LCSP to oppose this application.

We believe that in the context of the well known problems in the area, coupled with high-density residential accommodation and local schools, granting permission for yet another Betting Shop in Green Lanes, Harringay, would be against two of the three key Licensing Objectives of the Gambling Act 2005:

- Preventing gambling from being associated with crime or disorder
- Protecting children and other vulnerable persons from being harmed, or exploited by gambling

In particular, we note the relevance of the following statement in the Council's Licensing Policy Statement:

*'General Principles: when determining an application to grant a Premises Licence or review a Premises Licence, regard will be had to the proximity of the premises to schools, vulnerable adult centres or residential areas where there may be high concentrations of families with children'.*

The premises is located in the heart of Green Lanes, Harringay, an area which already has four betting shops nearby. Indeed, there is one directly opposite the proposed site and another just a few doors away. In making this point, we are not basing our argument on over-supply or likely demand, but rather on the likely over-exposure of children and vulnerable persons to gambling premises.

There is an important issue of cumulative impact for children who are especially likely to be aware of the proposed betting premises as it is located at the corner of Warham Road, and Green Lanes, directly opposite Harringays's main Post Office, which, of course, is used by large numbers of children and young people (with or without their parents) and vulnerable adults.

There are particularly large numbers of children both living in the area, and walking to and from school, because of the proximity of South Harringay Infants and Juniors School and Woodlands Park Nursery. Furthermore, because of the nearby mental health facilities in St Ann's Hospital, there is known to be a much higher than normal number of vulnerable adults both living and passing through this part of the Borough. There are also above average numbers of vulnerable adults on very low or fixed incomes, who can ill afford to lose any of their money in a betting shop which will no doubt aim to project an attractive and welcoming environment to draw in potential customers.

The LCSP is very concerned at the likely impact on all of these people if a licence is granted for the proposed premises, which occupies a very large and high profile site, at the corner of a busy junction, with residential accommodation not only behind (in Warham Road) but also adjacent and opposite (both in Green Lanes and along Salisbury Road).

Residents, traders, the police and Haringey Council have all been working hard to try to improve Green Lanes since the outbreak of violence and major crime in the area in November 2002. This has led to the creation of the Green Lanes Strategy Group which, by bringing everyone together, has achieved a lot of positive outcomes for our area. We are therefore very anxious to ensure that a surfeit of gambling activity in Green Lanes does not become a source of renewed crime and disorder.

For all these reasons, very large numbers of local residents, backed by all of our Ward Councillors, have signed a petition opposing the new betting licence, and support the

LCSP in writing this letter of objection. We are sure that the Licensing Sub Committee will give careful attention to all of these arguments before reaching its decision.

Yours sincerely



on behalf of the LCSP

[Approved by the representatives of Neighbourhood Watches and Residents' Associations in the following Roads:]

Representation from Green Lanes and the following Roads:

|                 |                 |
|-----------------|-----------------|
| Umfreville Road | Woollaston Road |
| Burgoyne Road   | Cavendish Road  |
| Pemberton Road  | Warham Road     |
| Seymour Road    | Hewitt Road     |
| Allison Road    | Beresford Road  |
| Effingham Road  | Fairfax Road    |
| Falkland Road   | Lausanne Road   |
| Hampden Road    | Sydney Road     |

S-8-07

FAO - Dahlia Barvett

Licensing Team

1 X Slip

12 X Pages with 122 petition signatures

From: Mario Petrov

8352 1020

More to come:

P.O. Box 48129, London, W15 3XF

## PROTECT OUR COMMUNITY'S CHILDREN AND VULNERABLE PEOPLE FROM EXPOSURE TO BETTING PREMISES

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| NAME                | ADDRESS                        |
|---------------------|--------------------------------|
| CLL - BRIAN HALEJ   | LBH                            |
| CLL Karen ALEXANDER | LBH                            |
| CLL Nilgun Canner   | n                              |
| CLL Carolyn Baker   | .                              |
| Luke ODwyer         | N8 ONP                         |
| Eileen ODwyer       | 122 Falkland Rd N8             |
| FATOS BEGIRI        | 18 <sup>B</sup> DUCKETT RD. N4 |
| KAROL GROUNSKI      | 106 WARHAM ROAD N4             |
| KONRAD KONOPKA      | 106 WARHAM ROAD N4 1AU         |
| Alan Millard.       | 108 WARHAM RD N4 1AU.          |

Please send this petition to:

Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

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| NAME                          | ADDRESS                   |
|-------------------------------|---------------------------|
| <i>A. Shie</i>                | 54 Pemberton Road, London |
| <i>U. Stone</i>               | 59 Pemberton Rd London    |
| <i>J. P.</i>                  | 54 Beresford Road         |
| <i>U. Stone</i>               | 54 Beresford Road         |
| <i>F. R. Scaer</i>            | 97 Pemberton Rd           |
| <i>La Vance</i>               | 100 Pemberton Rd          |
| <i>K. A. W.</i>               | 16 TEWKESBURY CLOSE       |
| <i>H. Harris</i>              | 102 Pemberton Rd          |
| <i>K. Harris</i>              | "                         |
| <i>Mrs &amp; Mr. Matthews</i> | 102 Pemberton Rd.         |

Please send this petition to:

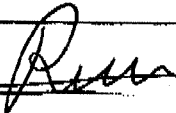

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| NAME                                                                                | ADDRESS                  |
|-------------------------------------------------------------------------------------|--------------------------|
| Nurto Mohammad                                                                      | 10b Warham Road N4 1AT   |
| JAMES BARRY                                                                         | 104 WIGHTMAN ROAD N4 8DC |
| Adam Skventon                                                                       | 61 Wightman Road N4 1A5  |
| N MARLONI                                                                           | 4 Pemberton Rd N4 1AZ    |
| C. GORDON                                                                           | 22 PEMBERTON RD. N4 1AZ  |
| KIM HENRIKSEN                                                                       | 30 PEMBERTON RD N4 1AZ   |
| LINDA STEPULIENAGE                                                                  | 32 PEMBERTON RD N4 1AZ   |
| J. MULOMBO                                                                          | 40 PEMBERTON RD N4 1A7   |
|  | 42 Pemberton Rd N4 1AZ   |
|  | 46 Pemberton Rd. N4 1AZ  |

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| NAME                | ADDRESS                                      |
|---------------------|----------------------------------------------|
| MITAL JETHWA        | 110 WAKETHAM RD, HARRINGAY, LONDON<br>N4 1AU |
| KULDEEP JETHWA      | 110 WAKETHAM RD, HARRINGAY, LONDON<br>N4 1AU |
| NISHA JETHWA        | " "                                          |
| VISHAL JETHWA       | " "                                          |
| JAYSHREE JETHWA     | " "                                          |
| SURENDEARINH JETHWA | " "                                          |
| RAJUBA JETHWA       | " "                                          |
| PRAFUL JETHWA       | " "                                          |
| DEAN DUNTON         | 108 " "                                      |
| MAGGIE SULLY        | 100 Warham Road, N4 1AU.                     |

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| NAME            | ADDRESS                  |
|-----------------|--------------------------|
| Sam Hall        | 100 WARHAM RD<br>N4 1AU  |
| TERRY VANHORNE  | 80 WARHAM RD N4 1AU      |
| RUTH VANHORNE   | " "                      |
| VIOLET VANHORNE | " "                      |
| REUBEN VANHORNE | " "                      |
| JOHN DOHERTY    | 24 "                     |
| GILL DOHERTY    |                          |
| GRAHAM TUCK     | 18 WARHAM ROAD, N4 1AT   |
| HELEN BOWELL    | 18 WARHAM ROAD, N.4 1AT. |
| BEN STEVENSON   | 61 WIGHTMAN RD, N4 1RJ   |

Please send this petition to:

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| NAME           | ADDRESS                           |
|----------------|-----------------------------------|
| HASAN          | 108 WARHAM RD N4 1AU              |
| SUZANA         | 104 WARHAM RD                     |
| CHANEL DAVIS   | 234 Woodship Lane N16 6GJ         |
| M. CHISHOLM    | 41 WARHAM RD N4 1AR               |
| L. Hettice.    | 94, Warham Rd.                    |
| O. BOZNOVA     | 20 Seymour Rd                     |
| H - AZD        | 78 WARHAM                         |
| ZENI. XHINDI   | 111. SEVEN - SISTERS              |
| Fahma          | 44 Warham Road N4 1AT             |
| COSTAS<br>KROU | 32 WARHAM R.D<br>LONDON<br>N4 1AT |

Please send this petition to:

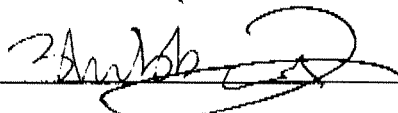
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| NAME                                                                               | ADDRESS                |
|------------------------------------------------------------------------------------|------------------------|
| MANZI                                                                              | 84 WARHAM ROAD         |
| B Hochmett                                                                         | 86 WARHAM ROAD         |
| B SWIFT                                                                            | 89 WARHAM RD LONDON N4 |
| A. SWANSTON                                                                        | 89 WARHAM RD LONDON    |
|  | 56 Warham Rd.          |
| P. Bamehu                                                                          | 42, Warham Road.       |
| J Gargella                                                                         | 28 Warham Road         |
| Anna Nofoa                                                                         | 26 WARHAM ROAD         |
| C. Mordwelli                                                                       | 16 WARHAM ROAD         |
| M Anderson                                                                         | 8 Warham Road.         |
| David Jones                                                                        | 8 Warham Road.         |

Please send this petition to:

Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

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| NAME                 | ADDRESS                   |
|----------------------|---------------------------|
| Sahra Aden           | 115 Waightman Road        |
| Sundas Jibril        | 115 Waightman Road        |
| Ahmed Gaboric        | 132 Waightman Road N4 1RL |
| Tony Dondani         | 1 Wankam Rd.              |
| Jesirehberiforset    | 13 Pemberton Road         |
| Grace M. J. J.       | 63 Rutland Gardens        |
| Kirstian Krabulec    | 13 Pemberton Road         |
| THASSA VEMHON DILYCI | 17 PEMBERTON              |
| Ju Gre               | 23 Pemberton Rd.          |
| SIMON PASQUILL       | 25 PEMBERTON              |
| EMMA CORBET          | 25 PEMBERTON RD           |

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Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

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It is unacceptable and outrageous that our community's young children and most vulnerable citizens could be overly exposed to an activity only adults can lawfully indulge. It is also unfair, underhanded and despicable that the single public notice advertising this application was not displayed until 23<sup>rd</sup> July (after the schools close) and the period to comment finishes on 14<sup>th</sup> August (before they reopen). It would be wholly inappropriate, and a crime (which we have an unenviable record and serious problem) against our community, were this damaging application, which threatens social cohesion, to be granted approval.

| NAME          | ADDRESS                     |
|---------------|-----------------------------|
| U. Reason     | 33 Pemberton Rd. N.4. L.A.X |
| P Ward        | 37 Pemberton Rd N4 1AX      |
| P. WILLYS     | 45, PEMBERTON ROAD N4 1AX   |
| R Cusack.     | 45 Pemberton N4 1AX         |
| B King        | 47 Pemberton Rd N4 1AX      |
| J. Wolberg    | 49 Pemberton Road N4 1AX    |
| S Smyth       | 51 Pemberton Rd N4 1AX      |
| D. FITZGERALD | 51 Pemberton Rd N4 1AX      |
| O SMITH       | 51 Pemberton Road N4 1AX    |
| C CHAMBERS    | 53C Pemberton Rd.           |

Please send this petition to:

Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

## PROTECT OUR COMMUNITY'S CHILDREN AND VULNERABLE PEOPLE FROM EXPOSURE TO BETTING PREMISES

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| NAME                  | ADDRESS             |
|-----------------------|---------------------|
| Booze Beata           | 33 Pemberton Rd     |
| Glenn Green           | 104 Pemberton Rd.   |
| J. Smith              | Green.              |
| <del>John Kelly</del> | 112 Pemberton.      |
| John Kelly            | 114 Pemberton Road. |
| M. McKee              | 118 Pemberton Rd    |
| Dominic Hedderley     | 118 Pemberton Rd    |
| Shela Cronin          | 120 Pemberton Rd    |
| Don Cronin            | 120 Pemberton Rd.   |
| <del>John Kelly</del> | " " "               |

Please send this petition to:  
Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

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| NAME               | ADDRESS            |
|--------------------|--------------------|
| Daryl Jones        | 97 Warham, N4      |
| O. Odysseos        | 105 Warham R.d N4. |
| R Rhodes           | 144 WARRHAM ROAD   |
| Liz + Mark Edwards | 81 Warham Road, N4 |
| Sho young-park     | 77 warham Road     |
| S. Lemoviy         | 53 Warham Road     |
| H-CHOUHDHURY       | 39 WARRHAM ROAD    |
| C HEADS            | 51, WARRHAM ROAD   |
| M Tomlin           | 33, WARRHAM RO     |
| Selma              | 12 Pemberton       |

Please send this petition to:

Ms D Barrett, Licensing Team, Civic Centre, High Rd. Wood Green, London, N22 8LE

## PROTECT OUR COMMUNITY'S CHILDREN AND VULNERABLE PEOPLE FROM EXPOSURE TO BETTING PREMISES

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| NAME                   | ADDRESS                   |
|------------------------|---------------------------|
| Fanni Fazelas          | 71, Uxbridge Road, N4 1SA |
| Shefik Mehmet          | 455 Green Lanes N4 1HE    |
| Stuart Cudge           | 117 Warham Rd N4 1AS      |
| C Barnett              | 83 Warham Road N4         |
| K. Suleymanli          | 59 Warham Rd.             |
| I. Habis               | 57 Warham Rd.             |
| M. Habis               | 57 Warham Rd.             |
| David Habis            | " " "                     |
| Asha Habis             | " " "                     |
| LINCOLN THOMPSON TAITT | 76 Warham Road.           |

Please send this petition to:

Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE



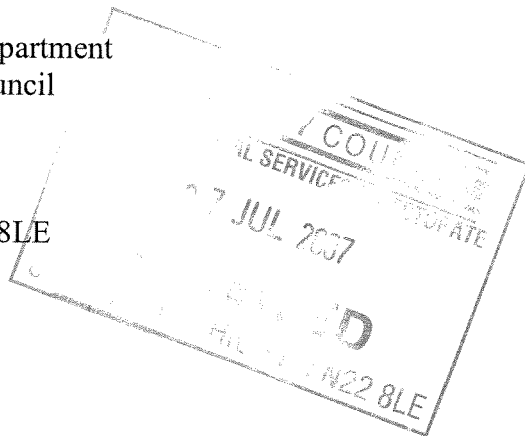
REPRESENTATIONS FROM  
THE TRADE.



GOSSCHALKS  
SOLICITORS



Licensing Department  
Haringey Council  
Civic Centre  
High Road  
Wood Green  
London N22 8LE



**Our ref:** RJT.BS.97000-593-6

**Your ref:**

**Date:** 26 July 2007

**E-Mail:** rjt@gosschalks.co.uk

Dear Sir

re: **Gambling Act 2005**  
**Application for a Betting Premises Licence by Metrobet Limited**  
**Premises: Metrobet Limited, 507 Green Lanes, Haringey, London N4 1TB**  
**Our client: William Hill Organization Limited**

We act for William Hill Organization Limited who trade from premises at 519 Green Lane, N4 and 435 Green Lanes, N4. Our client has business interests, which may be affected, if this application were to be granted. As such, our client is entitled, in accordance with S.158 of the 2005 Act, to make representations in relation to this application.

The application premises are situated along a stretch of Green Lanes, which is already adequately served by five existing betting offices. In addition there is a further betting office application, refused by the Local Magistrates, pending an Appeal to be heard 20<sup>th</sup> August 2007. The addition of a further betting office would amount to an over proliferation of betting offices and gambling establishments within this vicinity.

An additional gambling facility in this already well-served area creates a risk to the licensing objectives. There is nothing in the 2005 Act, which requires that the level of risk be objectively quantified. The Licensing Authority is entitled to consider whether it is proper to draw an inference that such a risk would arise and to take a precautionary approach on the matter given the importance of the licensing objectives themselves and the relevant provision of the Gambling Commission guidance and Code of Practice issued to Licensing Authorities.

There is ample opportunity to gamble in this area and it is neither in the public interest nor in accordance with the licensing objectives for further high staking gambling opportunities to be offered.

Queens Gardens, Hull, HU1 3DZ    T 01482 324252    F 01482 590290    E info@gosschalks.co.uk    W www.gosschalks.co.uk    DX 11902 - Hull

Partners- Simon Lunt, Bruce Raper, Bruce Wilkie, Ian Lanch, Richard Llewellyn, Anthony Clark, Neil Johnson, Clare Johnson, Richard Gooch, Christopher Burton, Roy Taylor, Robert Thomson, Jonathan Beharrell, Nigel Beckwith, Zoë Carmichael, Nicholas Dean, Mark Teal, Stephen Walker, Andrew Mallory, Ian Brown, Robert Hastie, Richard Taylor, Andrew Johnson, Mark Day, Jonathan Peet, James Phinn, Justin Graves, Matthew Fletcher, John Coulson, Andrew Tarbutt, Ted Flanagan, Kate Groves, Craig Beetham

Associates - Ashlie Prescott, Steve Dillon, Chris Groves, Paul Plaxton, Victoria Quinn, Jonathan Hyldon, Nicola Barrass

Partnership Secretary – Martin Haldenby

Gosschalks are regulated by the Solicitors Regulation Authority.

We should be grateful if you would acknowledge receipt of this letter and contact us in order that we may advise you of our client's availability to attend the hearing.

Yours faithfully  
GOSSCHALKS



Licensing Unit  
Commercial and Environmental Protection Group  
Civic Centre  
High Road  
Wood Green  
London, N22 8LE

Fax: 023 8033 7902  
E-Mail: michael.messent@trethowans.com  
Our Ref: MJM01/PM01/142002  
Your Ref: Daliah Barrett



27 July 2007

Dear Sir

**Metrobet - 507 Green Lanes, Haringey**

We represent Ladbrokes Betting & Gaming Limited, who operate businesses in the vicinity of the application site at 10-12 Grand Parade, Green Lanes and 56 Grand Parade, Green Lanes.

Please accept this letter as representations made on behalf of our client in respect of the Application made by Metrobet in respect of the above address.

Ladbrokes are interested parties as defined by the Gambling Act Section 158 and your own Gambling Policy in that they have business interests which may be affected if the Application made by the Applicant is granted.

Representations are made in relation to the following licensing objectives:-

- (i) **Preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime.**

Ladbrokes and other major Bookmakers have security policies and procedures which seek to ensure that betting office premises are kept crime-free. Ladbrokes say that the addition of another Betting Office within the vicinity of their existing trading offices will significantly add to the problems of themselves and the other major Bookmaker Operators who are seeking to keep betting offices in the vicinity free of crime and disorder.

- (ii) **Ensuring that gambling is conducted in a fair and open way**

Currently and in the recent past, Metrobet have not always dealt with all their customers in a fair and equal way. Preferential betting terms have been made available to established and favoured customers, including the giving of "back shows". The availability of these shows is not always published and are not on offer to all customers.




- (iii) **Protecting children and other vulnerable persons from being harmed or exploited by gambling.**
- (a) Ladbrokes submit that an additional Betting Office in close proximity to the Ladbrokes Betting Offices at 10-12 Grand Parade and 56 Grand Parade, Green Lanes, together with the William Hill Betting Offices at 519 Green Lane and 435 Green Lanes and the Corals Betting Office at 559 Green Lanes, will give rise to such a concentration of Betting Offices in a comparatively small area that there will be a very much greater risk that the locality will become attractive to vulnerable persons. In addition, an application by Betting Shop Services Limited for an additional Betting Office Licence at 32-33 Grand Parade, Green Lanes, was refused by the local Betting Licensing Committee upon that basis that it would give rise to an unnecessary level of supply of Betting Offices and an unnecessary concentration of Betting Offices. Further, betting is a competitive business and in a highly competitive local market, Bookmakers are likely to feel it necessary to offer special concessions, bonuses and offers in an effort to attract a market share of a static or declining local betting market. Such offers might encourage vulnerable people to bet more than they should.
- (b) The number of gaming machines in individual Betting Offices is limited by law. The provision of a Metrobet Betting Office in Haringey will increase the number of gaming machines in the area and thereby add to the risk that vulnerable people will have additional opportunities to bet on such machines and to bet more than they should.
- (c) Young persons do congregate in this shopping area. The introduction of an additional Betting Office will give rise to still further concentration of gaming opportunities in a comparatively small geographical area, with the consequence that there will be a greater risk that it will become more attractive to young persons who may wish to attempt to gamble.

Representations are also made with regard to a procedural and jurisdictional issue, namely that a Licensing Authority shall not determine an Application for a Premises Licence until the relevant Operating Licence has been issued (Gambling Act 2005, Section 163(2)). It is believed that while the Applicant's Operating Licence Application has been lodged with the Gambling Commission, it has not yet been determined and accordingly this Application cannot be determined until the Operating Licence has been granted.

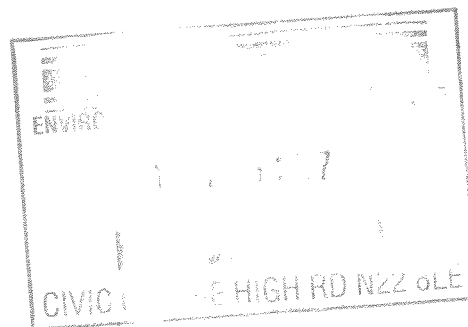
We should be glad if you will acknowledge receipt of this letter and inform us as soon as possible of the intended date, time and place at which your Authority proposes to consider and determine the application.

Yours faithfully



**By Special Delivery**

Licensing Department  
London Borough of Haringey  
Civic Centre  
High Road  
Wood Green  
London N22 8LE



09 August 2007

Our ref: ES/ C0002/91

Dear Sir or Madam

**Gambling Act 2005**

**Application for a Betting Premises Licence by Metrobet Limited**

**Premises: 507 Green Lanes, Harringay, London N4 1TB**

**Our Client: Coral Estates Limited**

We act for Coral Estates Limited.

Our client operates licensed betting offices at 559 Green Lanes, Harringay and 297 St Anns Road, Harringay. Our client is, therefore, an interested party to the above application for a Betting Premises Licence under s.158 of the Gambling Act 2005 by reason of having business interests which may be affected by the grant of this application.

Our client opposes the grant of this application and makes the following representations:

1. The application site is situated in an area which is already adequately served by six betting offices, namely:
  - Coral, 559 Green Lanes (approximately 200 yards from the application site);
  - Ladbrokes, 10-12 Grand Parade, Green Lanes (approximately 25 yards from the application site);
  - Ladbrokes, 56/57 Green Lanes (approximately 325 yards from the application site);
  - William Hill, 519 Green Lanes (approximately 30 yards from the application site);

**Harris Hagan**

Solicitors

Tel: +44 (0)20 7651 4040 Fax: +44 (0)20 7651 4049 email: info@harrishagan.com website: www.harrishagan.com

Partners: Julian Harris, John Hagan, Elizabeth Southorn

Consultant: David Stevens

Regulated by The Law Society

- William Hill, 435 Green Lanes (approximately 275 yards from the application site);
  - Coral, 297 St Anns Road (approximately 400 yards from the application site).
2. In addition, an application for a further betting office licence in Grand Parade, Green Lanes under the Betting Gaming and Lotteries Act 1963 was refused after careful consideration of detailed evidence at a hearing on 08 August 2006 before the Betting Licensing Committee of Haringey Magistrates' Court. This refusal is subject to an Appeal commencing on 20 August 2007.
  3. Granting an additional betting premises licence in this location would result in an overprovision of betting offices leading to a concentration of gambling premises in this locality. This would be inconsistent with the third licensing objection in s.1 of the Gambling Act 2005 which concerns itself with protecting children and other vulnerable persons from being harmed or exploited by gambling.
  4. Any other ground which may arise from the applicant's case at the hearing.

We should be grateful if you would acknowledge receipt of this letter and confirm when this matter will be listed for hearing.

Yours faithfully



**Harris Hagan**

**REPRESENTATIONS FROM  
WARD COUNCILLORS.**



Attn: Licensing team  
Enforcement  
Urban Environment  
Civic Centre  
High Road  
Wood Green  
N22 8LE

13<sup>th</sup> August, 2007

To whom it may concern,

Re: Application under Gambling Act 2005 for 507 Green Lanes

I am writing on behalf of myself and Councillor Karen Alexander, Liberal Democrat representatives for Harringay ward to oppose the above application. It is our view that that there is the potential for a betting shop in this location to adversely affect vulnerable young people and for it to lead to increased crime and disorder. A betting shop is likely to attract young, unemployed people of which there are very many in the location as well as other clients. I consider this group of people to be vulnerable as they are looking to improve their lives financially while at the same time being ill able to afford to waste money on gambling. The potential loss of income could be extremely detrimental to this group of people.

There is also the potential that an individual with little disposable income who becomes addicted to gambling could get involved in criminal activity in order to fund a habit. This could potentially have a detrimental affect on surrounding businesses. I would argue therefore that this isn't really a suitable location for this type of establishment.

Yours sincerely,  
Cllr Carolyn Baker  
Liberal Democrat Representative, Harringay Ward

Members Room  
River Park House  
225 High Road, Wood Green  
London, N22 8HQ

6 August 2007

Dear Sir / Madam

**Metrobet - 507 Green Lanes, Haringey**

I am writing to you as Chair of the Green Lanes Strategy Group to formally object to the application submitted for 507 Green Lanes N4 - Metrobet Ltd as a gambling establishment.

The Green Lanes Strategy Group is a formal constituted consultative body of the Council whose membership consists of ward Councillors, local community representatives, the Haringay Traders Association, the Metropolitan Police and Council Officers. At its meeting on 26 July the Group expressed their concern regarding the recent application for the above premises.

The Green Lanes Strategy Group felt that the location of these premises is directly opposite Haringay's main post office which is one of the main focuses for the local community and is around the corner from the South Haringay Primary School and is in close proximity to a number of other schools, key community buildings, faith establishments and is in a residential area.

In view of this, The Green Lanes Strategy Group would like to make the following representations in relation to the following licensing objectives:-

**(i) Preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime.**

The increase in the number of such establishments of which there are already an excessive number along this stretch of Green Lanes would increase the risk of them being associated with crime and disorder making it much more difficult to control.

**(ii) Ensuring that gambling is conducted in a fair and open way**

There are no safeguards identified to ensure that this is adhered to and again the increase in the number of such establishments will make it more difficult to monitor.

**(iii) Protecting children and other vulnerable persons from being harmed or exploited by gambling.**

The close proximity of these premises to three schools, a number of community centres and faith establishments in an area that is predominately residential which encourages and brings in a number of young and vulnerable people into this very highly concentrated shopping area would further increase the risk to these groups.

Yours faithfully

Cllr Nilgun Canver  
Chair, Green Lanes Strategy Group

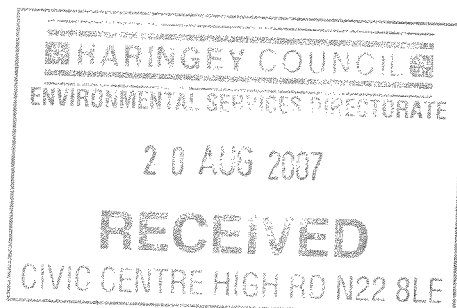
APP 4

RESPONSE TO TRADE  
REPRESENTATIONS FROM  
APPLICANT

# metrobet

Daliah Barrett-Williams  
Lead Licensing Officer  
Licensing Team  
2<sup>nd</sup> Floor  
High Road  
Wood Green  
London  
N222 8LE

Metrobet Limited  
260 Seven Sisters Road  
Finsbury Park  
London  
N4 2JA  
August 17, 2007



Dear Ms Williams

Objections - 507 Green Lanes, Haringey

I write to update you on our proposed course of action with regard to the objections you have received in relation to the above premises.

We have prepared a comprehensive response in relation to the trade objectors, William Hill, Ladbroke and Coral. This is currently with our lawyers for review.


In essence, we will argue that none of these companies have business interests, other than by way of competition, which could be affected by the new site. As the Act and subsequent guidance makes it clear that mere competition is not a ground for objection, we argue that the Authority is entitled to reject their representations as inadmissible.

We further argue that if the representations are admissible, each of their representations should be rejected as vexatious, frivolous and irrelevant as no evidence is produced to support them, they are not supported by objections by any of the relevant authorities to whom notice was served, and it is clear that the objectors believe that their existing 5 shops are run without threat to the licensing objectives. To argue that a sixth shop, without evidence or support from competent authorities such as the police, run using the same standards of care, would add significantly to risk, is simply not credible.

We are reviewing the latest objections, which again are presented without evidence. We will produce an aggregated response to these for review by our lawyers.

I expect that the review should be complete over the course of the next two weeks so that we can submit to you our comprehensive response to the objections.

Yours sincerely

  
Nigel Smith  
CEO

APP 4A

WITHDRAWAL LETTER FROM  
LADBROKES

The Director General's House  
Rockstone Place  
Southampton  
SO15 2EP  
DX: 154120 SOUTHAMPTON 48  
Tel: 023 8032 1000  
www.trethowans.com

Licensing Unit  
Commercial and Environmental Protection Group  
Civic Centre  
High Road  
Wood Green  
London, N22 8LE

Fax: 023 8033 7902  
E-Mail: michael.messent@trethowans.com  
Our Ref: MJM01/MJD01/142002  
Your Ref: Daliah Barrett

14 September 2007

Dear Sir

**Metrobet - 507 Green Lanes, Haringey**

As you know we act for Ladbrokes.

Please accept this letter as sufficient notice that we have been instructed to withdraw our client's representations.

We regret any time which may have been spent by you and your other Officers as a consequence of these representations having been lodged, but at least your Committee will be spared the task of considering them, and we trust that this will save time.

No doubt you will advise the applicant in due course.

Yours faithfully



**Lexcel**  
PRACTICE MANAGEMENT STANDARD  
THE LAW SOCIETY

Trethowans - solicitors regulated by The Law Society  
A list of partners is available for inspection at the Salisbury office