

LADDER COMMUNITY SAFETY PARTNERSHIP

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Premises Licence: Betting: Adult Gaming Centre 519 Green Lanes N4 1AN

1. Introduction

I am writing to you on behalf of the local community in my capacity as elected Chair of both the Ladder Community Safety Partnership (LCSP) and the Harringay Ward Police Panel. The LCSP is an umbrella organization containing many individual members but also representatives of Neighbourhood Watches and Residents' Associations throughout the Ward including Green Lanes. We are an independent group, although we work in partnership with many other key stakeholders to improve the quality of life for local people. The Police Panel obviously works closely with our local officers and sets priorities which aim to keep the area safe, and free from crime, antisocial behaviour and other nuisances.

Our members – and particularly those who live near the premises (in flats along Green Lanes and at the eastern end of adjacent Ladder roads) – are very concerned at the prospect of an AGC opening 24 hours a day, 7 days a week. We believe that, in the specific context of the local area, granting permission for a 24/7 gambling outlet in Green Lanes, Harringay, would be against two of the three key Licensing Objectives of the Gambling Act 2005:

- \$** Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime
- \$** Protecting children and other vulnerable persons from being harmed, or exploited by gambling

Evidence for our concerns is given in sections 2 and 3 below

1. Green Lanes context

The proposed AGC is located in the heart of Green Lanes, and is very close to all of the four existing betting shops, and the existing Adult Gaming Centre at 48 Grand Parade. Indeed two of these are extremely close (at 507 Green Lanes and another opposite, at 12 Grand Parade).

The clustering of such premises in a small area is not in general a relevant representation. However, LBH has made it clear that it is concerned about the proliferation and overconcentration of betting outlets, which has emerged as an important local issue (eg Development Management DPD p.77). Town Centres, such as Harringay Green Lanes, are particularly at risk because of this overconcentration. Although we have cited a planning document, it is a relevant context in the licensing terms because of the late-night problems which this application will cause, eg more criminal activity, greater risk for vulnerable adults, increased problem gambling. All of these are, of course, relevant licensing issues.

2. Crime and Disorder Issues

The large number of premises with gaming machines provides an obvious target for irate punters who have lost money (criminal damage cases), while professional criminals or opportunist crime target both the machines and the cash in transit. Staff and innocent bystanders are also vulnerable.

It should be remembered that many of the criminal damage cases are simply not reported. This is because betting outlets do not wish to be associated with too many such occurrences for fear that their licence may be called in for review.

It is worth noting that criminal damage to machines is very common. A typical offence is committed out of anger and frustration when a punter loses his money: offenders are almost invariably male. Links between crime and addiction are extremely well known and there is little doubt that some customers will be committing acquisitive crime in the local area to feed their addiction.

In this context of gambling-induced crime, it is worth noting that the Green Lanes area has for some time been the focus of a campaign to reduce burglary. There has also been a concerted - and ongoing - effort by the Harringay SNT police to improve security at vulnerable domestic properties throughout the Ladder roads in order to reduce the likelihood of burglary.

The Harringay area is already a well-known hot-spot for drug dealing, including Class A. As a result, all three of the Met police Ward priorities are based around drug dealing in conjunction with other criminal behaviour. There is a very real concern that a 24/7 gambling outlet will act as a magnet for criminal activity, especially as this is already the case in similar locations eg near Turnpike Lane.

It is hard to avoid the conclusion that the local community in and around Green Lanes would be put at an increasing risk of crime if a new gambling outlet were to open in Green Lanes, offering the opportunity to gamble 24 hours a day, 7 days a week – something which is not currently available anywhere else in the vicinity.

3. Children and Vulnerable Persons Issues

Haringey's Statement of Gambling Policy 2019-22 (pp.18-21) makes it clear that when

determining an application to grant a Premises Licence the Council will have regard to the location of services for children and the need to protect vulnerable adults. All of these factors are relevant here, as shown below.

(a) Schools and Children

The site of the proposed betting shop is between North and South Harringay Schools (Mattison and Falkland Roads respectively). There are also many other facilities for children nearby, for example in Cavendish Rd and Woodlands Park Rd. As they are local schools, most of the children will live in Harringay and St Ann's wards, in the residential streets of the Ladder and the Gardens. In addition, of course, there are many other children between the ages of 11 and 18 who live in the area..

Local parents have told the LCSP that they do not want their children to be over-exposed to ever-increasing numbers of gambling premises on their way to and from school, or to the shops in Green Lanes. Gambling premises, passed several times every day, mentally creates an impression that gambling is somehow only to be expected as a dominant presence in daily life. This is not the sort of environment in which parents should be forced to bring up their children.

(b) Vulnerable adults

There is an unusually high number of vulnerable adults in the area. There are three main reasons for these high numbers:

- (i) the extensive mental health care facilities at St Ann's Hospital, which draws in vulnerable adults from a broad area of North London.

- (ii) an exceptional number of vulnerable adults living in *>care in the community=* in the two wards adjacent to Green Lanes. Harringay ward in particular has one of the highest numbers of hostels of all 19 wards in the borough.

- (iii) There is also an unusually high number of vulnerable adults in the area because of the huge number of HMOs (Houses in Multiple Occupation). Harringay ward has the largest number of *any* ward in the Borough, with St Ann's not too far behind. For example, under the Council's Selective Licensing Scheme (currently under review and planned for introduction later this year) this core area of Green Lanes, is a hotspot as identified by the Lower Super Output Areas. This means that it has disproportionately high numbers of HMO/private sector dwellings and is problematic in terms of: poor housing, environmental crime, ASB, and crime reported to the police.

Too often, family houses have fallen victim to excessive sub-division into large numbers of small units, which are frequently found to be homes of young single men - many of them vulnerable adults: recent migrants, asylum seekers, refugees, those who lack the means to live anywhere else. Such adults may be all too willing to take a gamble, believing that they have nothing to lose. Academic studies in a number of countries, including Australia, Sweden and the United States, have shown the rate of problem gambling to be several times higher among minority or immigrant groups than the rest of the population.

(c) Vulnerable Adults and Problem Gambling

The lives of vulnerable adults are clearly harmed by addiction. Slot machines are recognised as highly addictive and this application, if successful, will simply increase the opportunity to feed that addiction by offering a gambling facility at very late hours when no such venue is currently open anywhere else in Green Lanes.

Evidence for Problem Gambling

GamCare (funded by the gaming industry) is the leading agency offering help and support to problem gamblers. Their Annual Reports reveal the steadily increasing numbers of people seeking help each year. The Gambling Commission estimates that there are a quarter of a million problem gamblers in Britain, but Gamblers Anonymous thinks it is well over half a million. Either way it is certainly a significant and growing problem.

GamCare's Annual Reports reveal that their callers seeking help were largely male, and that the key age-group was 18-35 years old - the very group which are above-average in numbers in the two wards either side of Green Lanes, often single, living in accommodation such as HMOs (see above). This is based on latest census returns which, it is recognised, are an underestimate in this case, because many such vulnerable adults simply do not fill in their returns.

Problems of increased availability for vulnerable adults

We are seriously concerned that an outlet with longer hours in Green Lanes will simply provide more temptation, through increased availability, for the very large number of vulnerable local adults in the area. There is plenty of academic research which supports this stance, ie that increased availability leads to more gambling and more problem gambling for the vulnerable.

One study (supported by Gamcare - Ref 1) noted how *>the more marginalised and deprived are often the most susceptible* (to problem gambling and debt).

Conclusion

In the light of this evidence, the conclusion must be that a new gambling outlet in Green Lanes offering access to slot machines 24/7 will have a seriously adverse impact on two of the key licensing objectives.

The increased risk of crime, whether violent or acquisitive, could obviously affect literally anyone; children will be at an increased risk of exposure to more gambling; while the large number of vulnerable adults are far more likely to gamble (or worse still, fall victim to addiction) given a hugely increased time frame of 24/7.

We therefore urge the Council, as the Licensing Authority, to limit the trading hours of the AGC to 9am - 11pm daily. This would be the same as the nearby AGC at 48 Grand Parade, and in line with all of the existing betting shops. It would limit, or even prevent, many of the problems outlined in this representation, and ensure that problem gamblers, vulnerable adults, and criminal elements do not suddenly enjoy 24/7 access to gambling in the heart of our local community.

Yours sincerely

Ian Sygrave

Chair, on behalf of the LCSP

Chair, on behalf of the Harringay Police Panel

Ref 1: *Gambling and Debt Pathfinder Study 2009*, produced jointly by Manchester Metropolitan University, Gamcare, the Money Advice Trust and the Salvation Army