

Rep 1

From:

Sent: 07 April 2020 14:52

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

Subject: Objection

I would like to place on record my objection to the application for a new adult gaming centre premises licence at 450-454 Tottenham High Road.

My objections are based on concerns that such a premises will:

1. Increase the likelihood of crime and antisocial behaviour in an area already blighted by groups congregating around premises offering gambling opportunities and taking part in street drinking, smoking and exchanging drugs and using gambling premises as a place to meet to deal drugs.
2. The premises is on a part of the High Road frequented by children and families and will serve to normalise the behaviour of gambling, which could lead to further harms of vulnerable and young people being led into addictive habits.
3. The premises is on a route frequented by school children and close to Bruce Grove Youth Centre, sufficient that the addition of a gaming centre would most likely act as a pole of attraction for young adults who would be at risk of harm and exploitation through gambling.
4. The premises falls within the Council's Schools Super zone. The school super zone policy aims to create healthier and safer places for children and young people to live, learn and play. The zones cover areas within a 10 minute walk of a school (i.e. it would include the site for the premises under consideration) and are designed to protect children's health and encourage healthy behaviour in more deprived communities such as exists in the Tottenham Hale and Bruce Grove ward areas. Within each zone the Council is, among other aims, looking to reduce: Unhealthy food and drink sales, Advertisements and Alcohol, smoking and gambling. I believe the siting of the adult gaming centre would contravene the aims and objectives of the Council's School Superzone policy, designed to protect children from harm.
5. As the application seeks to gain 24-hour operation, this is likely to place further strain on already depleted resources of policing and enforcement to keep anti-social behaviour, noise nuisance and criminal activity already prevalent in the area under control.
6. We already have too many gambling establishments on the highroad and we do not need any more to blight the local area.

I would be grateful if my objections could be placed before the licensing committee.

Rep 2

From:

Sent: 08 April 2020 12:34

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

Subject: Objection - Application a New Adult Gaming Centre Premises Licence - Game Nation, 450-454 High Road, Tottenham, N17 9JD

VERY STRONG OBJECTION

Application for a New Adult Gaming Centre Premises Licence - Game Nation, 450-454 High Road, Tottenham, London, N17 9JD Ward - Tottenham Hale Seeking 24 hours operation

I live in Bruce Grove and I shop on our High Road as much as possible I have seen the negative impacts that gaming and gambling shops have on the neighbourhood.

I object on the grounds that, if granted, such a licence will lead to an increase in crime and disorder, late-night noise and nuisance and affect public safety and cause harm to children in our community.

You can go just a bit further north of 450/454 and see the people hanging around the existing gaming establishments. Ask the nearby shop owners about the effect that the existing gambling/gaming shops have on the neighbourhood i.e a very negative one.

Gaming places are contributing to the destruction of the community life by drawing a clientèle that congregates around the entrances of these places and causes many problems with their anti-social behaviour.

It is intimidating for young people, children and lone females. We have had the local police and council working for years now to reduce the problems with the existing "adult gaming places" just next to the Holcombe market. These have a serious negative impact on the "attractiveness" of the High Road as a place to come and shop - a destination. Adding another one of these will counter all the efforts being made by the council to improve our High Road - with the ongoing scarcity resources and soon to get worse reduced availability of money.

How will the Council convince an investor to build a new Bruce Grove station? And other investors, be they corporate or independent small start ups, why would they want to come to place with a High road lined with gambling houses? ASK THE POLICE about residents complaints re the antisocial behaviour that they bring. If you do a proper poll on the Bruce Grove High Road you will find very few residents who want another gambling shop on the High Rd.

Gaming shops also have very negative impact on the shop frontages. They block up of their shop windows reducing the number of active frontages. They also promote gambling in a neighbourhood which already sits a very high up in the "deprivation charts".
NO MORE GAMING HOUSES IN BRUCE GROVE HIGH ROAD - ENOUGH IS ENOUGH!

Rep 3

From:

Sent: 08 April 2020 16:59

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

Subject: Objection to Game Nation licence application

Game Nation has applied for a Premises Licence under the Gambling Act 2005 to open an outlet at 450-454 High Road, Tottenham seeking 24-hours operation. I

Our objections are based on concerns that such a premises will:

- 1. Increase the likelihood of crime and antisocial behaviour in an area already blighted by groups congregating around premises offering gambling opportunities and taking part in street drinking, smoking and exchanging drugs and using gambling premises as a place to meet to deal drugs.*
- 2. The premises is on a part of the High Road frequented by children and families and will serve to normalise the behaviour of gambling, which could lead to further harms of vulnerable and young people being led into addictive habits.*
- 3. The premises is on a route frequented by school children and close to Bruce Grove Youth Centre, sufficient that the addition of a gaming centre would most likely act as a pole of attraction for young adults who would be at risk of harm and exploitation through gambling.*
- 4. The premises falls within the Council's Schools Super zone. The school super zone policy aims to create healthier and safer places for children and young people to live, learn and play. The zones cover areas within a 10 minute walk of a school (i.e. it would include the site for the premises under consideration) and are designed to protect children's health and encourage healthy behaviour in more deprived communities such as exists in the Tottenham Hale and Bruce Grove ward areas. Within each zone the Council is, among other aims, looking to reduce: Unhealthy food and drink sales, Advertisements and Alcohol, smoking and gambling. I believe the siting of the adult gaming centre would contravene the aims and objectives of the Council's School Superzone policy, designed to protect children from harm.*
- 5. As the application seeks to gain 24-hour operation, this is likely to place further strain on already depleted resources of policing and enforcement to keep anti-social behaviour, noise nuisance and criminal activity already prevalent in the area under control.*

Thanks,

Rep 4

From:

Sent: 12 April 2020 08:58

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

Subject: Opposition to licensing application by City Gaming Limited - for the adult gambling centre "Game Nation" N17 9JD

Dear Sir, Madam.

My name is residing on. (Tottenham Hale ward). Interested party.

I am writing to register my objection to the application for a premises licence by City Gaming Limited for the adult gambling centre "Game Nation" on 450-454 High Road, Tottenham, London N17 9JD
Ward:Tottenham Hale

The basis for this opposition is that granting a licence for these premises will not promote the licensing objectives, particularly the prevention of crime, disorder and antisocial behaviour, and will pose a risk to vulnerable people and minors in the area.

450-454 High Road, Tottenham lies within the Council's identified Area, and enabling the premises to provide gaming facilities would be totally detrimental to the Council's aims and objectives and its STATEMENT OF GAMBLING POLICY 2019-2022
https://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_statement_of_gambling_policy_2019_web.pdf.

Furthermore the "GAMBLING ACT 2005 GAMBLING LOCAL AREA PROFILE established in JANUARY 2019
https://www.haringey.gov.uk/sites/haringeygovuk/files/local_area_profile_-_gambling_web.pdf has already established that the location of the premises is suffering from a high level of crime, disorder and public nuisance related to gambling premises and which have already reached problem levels for the local police.

The area is significantly impacted upon due to Higher levels of crime • Drug dealing and misuse • Gang activity in the area • Issues with street drinking and anti-social behaviour • Issues with street begging • Homelessness • The vulnerable persons incident count where gambling premises are located is high.

There are Mental health support accommodations in the vicinity, people with mental health issues are more likely to suffer from gambling addiction.

The local authority is supposed to offer "protection of children and other vulnerable persons from being harmed or exploited by gambling. There are primary schools in less than 400 meters (eg: Mulberry Primary school) as well as Parks, open spaces, play areas/adventure playgrounds, Places of worship Churches and faith based premises, in the vicinity of the proposed application location.

In view of the above, I would urge the Licensing Authority to refuse the application.

Yours faithfully,

Rep 5

From:

Sent: 12 April 2020 15:58

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

Subject: Objection to gambling shop - Game Nation

To whom it may concern,

I am writing to add my voice to local concerns at the prospect of another gambling shop on the Tottenham Highstreet.

Gambling shops contribute nothing to the community, only take away. And they create far more problems than solutions for an already impoverished area.

In addition it would be far better to use that space for a local start up or small business rather than large one.

There is already a huge issue of people hanging around betting shops, drinking and using drugs and adding another space for people to do this is a shocking idea.

I understand that this building was applied for previously for a gambling outlet - I am shocked that the council are considering this again when the original application was rejected amongst so much local campaigning.

Yours sincerely

Rep 6

From:

Sent: 21 April 2020 12:53

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

Subject: Objection to Game Nation application for a new adult gaming centre premises licence at 450-454 Tottenham High Road.

Hi,

I would like to place on record my objection to the application for a new adult gaming centre premises licence at 450-454 Tottenham High Road.

My objections are based on concerns that such a premises will:

- 1. Increase the likelihood of crime and antisocial behaviour in an area already blighted by groups congregating around premises offering gambling opportunities and taking part in street drinking, smoking and exchanging drugs and using gambling premises as a place to meet to deal drugs.*
- 2. The premises is on a part of the High Road frequented by children and families and will serve to normalise the behaviour of gambling, which could lead to further harms of vulnerable and young people being led into addictive habits.*
- 3. The premises is on a route frequented by school children and close to Bruce Grove Youth Centre, sufficient that the addition of a gaming centre would most likely act as a pole of attraction for young adults who would be at risk of harm and exploitation through gambling.*
- 4. The premises falls within the Council's Schools Super zone. The school super zone policy aims to create healthier and safer places for children and young people to live, learn and play. The zones cover areas within a 10 minute walk of a school (i.e. it would include the site for the premises under consideration) and are designed to protect children's health and encourage healthy behaviour in more deprived communities such as exists in the Tottenham Hale and Bruce Grove ward areas. Within each zone the Council is, among other aims, looking to reduce: Unhealthy food and drink sales, Advertisements and Alcohol, smoking and gambling. I believe the siting of the adult gaming centre would contravene the aims and objectives of the Council's School Superzone policy, designed to protect children from harm.*
- 5. As the application seeks to gain 24-hour operation, this is likely to place further strain on already depleted resources of policing and enforcement to keep anti-social behaviour, noise nuisance and criminal activity already prevalent in the area under control.*

I would be grateful if my objections could be placed before the licensing committee.

Thanks,

Rep 7

From:

Sent: 23 April 2020 21:04

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

Subject: 450-454 High Rd, N17 9JN representation

Dear Haringey Licensing,

I am writing to object to the application to open an 'adult gaming centre' at 450-454 High Rd, N17 9JN. I have listed the reasons for my objection below.

1. There are already several betting shops/gambling establishments in the immediate vicinity. Between 486 & 440 High Rd there are 5 betting shops/adult gaming centres. That's 5 in 160 yards! Not to mention all the others within a mile radius.
2. Gambling establishments exploit vulnerable people. Research shows that areas with highest unemployment have the highest density of gambling establishments. Therefore it's people who already do not have enough money who use these businesses and lose money they don't have.
3. Such establishments employ very few people. It will not provide sufficient jobs for local people to justify the social & financial cost to the area.
4. I think the organisation who is making this application has cynically chosen this vacant unit because as a former bank it won't need planning permission for a change of use.
5. It will bring an increase in crime & anti-social behaviour.
6. The building in which this particular unit sits is very attractive. Both the units at the bottom of this building are currently vacant. From an aesthetic point of view, it would be desirable for one shop or restaurant to fill the entire space and enhance the building & area as a whole.
7. Haringey council want to develop & encourage a 'night time economy' in the area. Another bookie/arcade will not help fulfil that aim.
8. A lot of work has been done to this stretch of High Rd to improve it (widening pavements, moving crossings, Holcombe market refurb etc). It seems counterproductive to do this work & spend money improving the High Rd if every other shop is a betting shop.

I look forward to your response.

Yours sincerely,

Rep 8

From:

Sent: 27 April 2020 16:53

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

Cc: >; Barrett Daliah <Daliah.Barrett@haringey.gov.uk>

Subject: The Gambling Act 2005: AGC Application 450-454 High Road Tottenham N17 9JN.

Importance: High

Dear Sirs

I am a solicitor and represent Talarius Limited, which operates a business at 475 Tottenham High Road, London, i.e. across the road from the applicant site. As such, it has business interests that might be affected by the above mentioned application and the company is an "interested party" pursuant to section 158 of the Gambling Act 2005. The fact that we operate the same nature of business as the applicant, does not alter this fact.

In its capacity of interested party it wishes to make the following representations.

1. Have notices been given to the Responsible Authorities by the applicant (as it is expressly required to do regardless of whether the Authority itself provides copies to the Responsible Authorities)?
2. I note that the applicant has confirmed that it has the right to occupy the building – i.e. a legal right. While that may be the case, it is often the case that applications are made prior to the acquisition of the site – i.e. before a right to occupy has been acquired. In such circumstances, the appropriate application could be for a provisional statement as is confirmed in the Licensing Authority's Statement of Policy (3.18). Without a right to occupy, an application for a premises licence cannot be made.
3. Has the applicant provided the Local Risk Assessment (LRA) to the Responsible authorities as required by the LCCP?
4. The LRA contains a great deal of information in the Local Area Profile that serves to highlight substantial categories of perceived risk. However, it does not specifically identify them as risks in the "Risk Identification" column in the table at the bottom of the document and therefore does not offer any measures to mitigate them. Some general mitigating measures are described within the Local Area Profile itself (which additionally makes it confusing to read) such as CCTV coverage, door supervision and controlled entry through use of a Mag. Lock, but these are general considerations and not necessarily specific to the location or the perceived risks set out in the Local Area Profile.
5. Also on Page 1, there is no record of who completed the LRA, their position within the company or date when it was completed.
6. In the accompanying LCCP Policy and procedure document, there is a gap to fill in on page 4 to identify who completes the company's Test Purchasing. Indeed this seems to indicate that the document, a common template in the AGC sector, has not been tailored specifically for the applicant's business and therefore has received little true consideration.
7. The plan accompanying the application is a very important part of the application and there are real issues with it. Firstly, it appears defective as, in relation to the exits at the rear and side of the premises as shown on the plan, it does not describe the place/s from which entry and exit leads.
8. Is there a yard at the rear and if so, is it part of the proposed premises and where do the stairs in it lead? The application form suggests that the yard is indeed included within the premises boundary but it is not possible to tell from the plan. This is a key issue as the LRA must deal with the premises which forms the basis of the application.

9. The address written on the plan at the front entrance to the site refers to "Unit 1" 450-454 High Road, but "Unit 1" is not mentioned in the application or in the plan key. It did seem to be included in a previous but unsuccessful application. What is the correct address?

10. Finally in relation to the plan, it is not clear where the boundary of the actual premises lies. The key refers only to the area in which gaming machines will be made available.

Please accept the above serious issues as representations in relation to the application.

If you have any questions, please let us know, but in the meantime, we should be grateful if you would please confirm receipt.

Yours faithfully,

Rep 9

From: Cllr Gordon Ruth

Sent: 06 April 2020 14:00

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

Subject: Objection to application for a new adult gaming centre premises licence, 450-454 Tottenham High Road.

Dear Licensing team,

I would like to place on record my objection to the application for a new adult gaming centre premises licence at 450-454 Tottenham High Road.

My objections are based on concerns that such a premises will:

1. Increase the likelihood of crime and antisocial behaviour in an area already blighted by groups congregating around premises offering gambling opportunities and taking part in street drinking, smoking and exchanging drugs and using gambling premises as a place to meet to deal drugs.
2. The premises is on a part of the High Road frequented by children and families and will serve to normalise the behaviour of gambling, which could lead to further harms of vulnerable and young people being led into addictive habits.
3. The premises is on a route frequented by school children and close to Bruce Grove Youth Centre, sufficient that the addition of a gaming centre would most likely act as a pole of attraction for young adults who would be at risk of harm and exploitation through gambling.
4. The premises falls within the Council's Schools Super zone. The school super zone policy aims to create healthier and safer places for children and young people to live, learn and play. The zones cover areas within a 10 minute walk of a school (i.e. it would include the site for the premises under consideration) and are designed to protect children's health and encourage healthy behaviour in more deprived communities such as exists in the Tottenham Hale and Bruce Grove ward areas. Within each zone the Council is, among other aims, looking to reduce: Unhealthy food and drink sales, Advertisements and Alcohol, smoking and gambling. I believe the siting of the adult gaming centre would contravene the aims and objectives of the Council's School Superzone policy, designed to protect children from harm.
5. As the application seeks to gain 24-hour operation, this is likely to place further strain on already depleted resources of policing and enforcement to keep anti-social behaviour, noise nuisance and criminal activity already prevalent in the area under control.

I would be grateful if my objections could be placed before the licensing committee.

Cllr Ruth Gordon

Labour Member for Tottenham Hale Ward

Rep 10

From: Cllr Opoku Felicia

Sent: 28 April 2020 08:30

To: Licensing <Licensing.Licensing@haringey.gov.uk>; Barrett Daliah <Daliah.Barrett@haringey.gov.uk>

Cc:

Subject: Objection to granting of licence for Adult Gaming Centre at Unit 1, 450-454 High Road, Tottenham

Dear All,

RE: Objection to granting of licence for Adult Gaming Centre at Unit 1, 450-454 High Road, Tottenham

Myself and fellow Bruce Grove Ward councillors (Cllr Joe Ejiofor and Cllr Matt White) would like to raise a joint objection to the licensing application for an 'adult gaming centre' at Unit 1, 450-454 High Road London N17 7JN. We will be objecting to the proposal based on matters related to the prevention of crime and disorder, public safety and the prevention of public nuisance and public health, particularly the protection of children from harm.

There is a proliferation of betting shops along the High Road; there are at least 5 gambling premises on the short stretch of the High Road between the Police Station and Bruce Grove Station. Crime in the area is high particularly around the area of the existing betting shops. In fact as part of the TfL Bruce Grove public realm scheme bicycle stands had to be removed and placed in strategic areas to reduce the incidence of crime. Upon hearing about this application we contacted the Bruce Grove Safer Neighbourhood Team and they have informed us that they regularly receive calls to various betting shops along the High Road due to anti-social behaviour and drinkers causing issues and in their professional opinion another one will create further problems. Given the number of vulnerable young people and adults there are in the area we believe that insufficient safeguards can be put in place to prevent a surge in gambling addiction as a result of the opening of this establishment.

On this basis we are objecting on the following grounds under the Gambling Act 2005:

- Under the Guidance to Local Authority from Gambling Commission
- Objective 1 : Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime sections 5.3, 5.5, 5.7, 5.8, 6.38 and 6.42
 - Under the Council's policy
- Sections 3.4 and 3.7

Signed: Cllr Joseph Ejiofor, Cllr Felicia Opoku & Cllr Matt White – Bruce Grove Ward

Kind regards, - Felicia - Cllr Felicia Opoku Chair of Standards Committee Labour Councillor for Bruce Grove ward

Rep 11

From: Cllr Brabazon Zena

Sent: 13 April 2020 19:35

To: Licensing <Licensing.Licensing@haringey.gov.uk> **Cc:** Barrett Daliah <Daliah.Barrett@haringey.gov.uk>

Subject: Objection to granting of license for Adult Gaming Centre 450-454 High Road, Tottenham

Dear Licensing

I am writing to you regarding the application for an Adult Gaming Centre by Game Nation at 450-454 High Road Tottenham. I am Deputy Leader of the Council and Cabinet Member for Children and Families. I am also a local resident living some five minutes from Tottenham High Road. I also chair our local Residents' Association – Dowsett Estate RA.

Gaming Nation have applied for a premises license under the Licensing Act 2003 and also for an **Adult Gaming Centre Premises Licence under the Gambling Act 2005.**

I would assume from this that their application must be tested against the four licensing objectives in the 2003 legislation, and the additional three objectives as set out in the Gambling Act 2005.

I have very serious concerns about this application and wish to register my objection to both the granting of a premises license and also the Adult Gaming Centre license.

The first section of my representation is in response to three licensing objectives (as below) in the Licensing Act 2003. It is my view that granting a license to this centre would be in breach of those objectives.

- • The prevention of crime and disorder
- • Prevention of Public Nuisance
- • Public Safety

As a local resident I have a detailed knowledge of the immediate area where this premises is located. Almost directly opposite this premises is an already functioning 24hr gaming centre/slot machine centre. A few metres away on the same side of the road are four betting shops. Further along there are at least three further betting shops on Tottenham High Road – one near Bruce Grove Station and a further two near Northumberland Park. These establishments, and in particular the number of betting shops form a cluster of gambling venues which already cause anti-social behaviour in the area, including street drinking, drug dealing and drug taking. The adult gaming centre already operating on the High Road has also had anti-social behaviour and, with the betting shops acts as a magnet for vulnerable people, including those with mental ill health. I do not believe an additional gambling centre on the High Road would contribute to the health, well-being or regeneration of Tottenham High Road. Indeed, it is reasonable to assume that changes to gaming machines in betting shops – with the £2 limit imposed – could lead to people going to the gaming centre instead.

Turning to the application being made under the Gambling Act 2005, the three licensing objectives are:

- • preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime
- • ensuring that gambling is conducted in a fair and open way
- • protecting children and other vulnerable persons from being harmed or exploited by gambling

In addition, the Licensing Act 2003 has a fourth objective:

- • Protection of children from harm

My comments below relate to those objectives and I refer to the Council's Statement of Gambling Policy which discusses the issues related to gambling premises. I also refer to the Gambling Act Local Area Profile 2019.

The risks we are concerned about include those covered by the licensing objectives of the Gambling Act 2005 - crime and disorder; and the harm/exploitation of children and other vulnerable persons.

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

The policy further states :

Where an area is known to have high levels of crime this authority will consider carefully whether gambling premises are suitable to be located there, taking into account such factors as:

- • *levels of recorded crime,*
- • *the type of that crime,*
- • *levels of ASB related complaints.*

Linked to the policy is the Gambling Act Local Area Profile 2019.

This makes clear that Bruce Grove and Tottenham Hale wards score highly on the Index of Multiple Deprivation in relation to crime, anti-social behaviour with very high levels of people living in the vicinity who would be considered vulnerable. This includes people who suffer from mental ill-health, have drug problems, are homeless, in debt etc., These circumstances place people at great risk and there is a significant concentration of people with such problems in the area where this gaming centre is proposed. It would seem to be against Council policy to encourage additional gambling facilities in the area because of the high risk profile. Many people live in houses in multiple occupation; incomes are low; there is the main food bank at Tottenham Town Hall , and the centre for the homeless (Mulberry Junction) is a short walk along Tottenham High Road, a local church which offers help to the homeless an street drinkers is very nearby, with a church opposite offering advice and also a soup kitchen. These are facilities which are there *because* people locally are at risk and many are poor. This makes people vulnerable. Turning to children and young people, as Cabinet Member for Children and Families this is a particular area of worry in relation to having yet another gambling facility on Tottenham High Road. We are always concerned about children and young people being exploited. There are three under-fives facilities in the immediate vicinity; at minimum six primary schools; and the borough's principal youth centre is a short walk away. This centre works with some of the most vulnerable young people in Haringey, including those already known to the criminal justice system. In the light of this, I would draw your attention to the licensing objective to 'protect children and other vulnerable persons from being harmed or exploited by gambling' and the objective 'to protect children from harm'.

For these reasons I am opposing this application and would ask that this is brought before the Licensing Committee to consider.

Thank you

Rep 12

From: Barrett Daliah <Daliah.Barrett@haringey.gov.uk>

Sent: 27 April 2020 14:15

To: 'Nick Arron'

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

Subject: FW: UNIT1 450 HIGH ROAD TOTTENHAM LONDON N17

Dear Mr Aaron,

I am writing as the Licensing Authority Responsible Authority in making this representation against the above named application. It is recognised that local licensing decision making is an administrative and evaluative process requiring a proportionate balancing exercise, that allows all parties to consider the specific locality alongside the details of the application. An officer of the Licensing Authority, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Gambling Act 2005

The Licensing Authority representations are primarily concerned with the three licensing objectives;

- Preventing gambling from being a source of crime and disorder, being associated with

crime or disorder or being used to support crime

- Ensuring that gambling is conducted in a fair and open way

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

As a result of the premises licence application being received by Haringey Council for an **Adult Gaming Centre (AGC)**, the licensing authority have examined the area of where the AGC will be sited. Tottenham High Road in particular this section has its own unique mix of problems such as street drinkers, high levels of anti social behaviour, crime and disorder for many years. This area is a busy town centre consisting of numerous problematic social issues, pubs, betting

offices and late night refreshment premises, drug outreach centre and drug dealers throughout the day and night.

It is recognised that the location of the proposed premises is an important consideration. The unit is based along a busy section of the High Road and is a main thoroughfare for children and young people travelling to and from school or other activities, as well as for vulnerable persons seeking the addiction centre in Bruce Grove and the local soup kitchen as well as the local post office and market area at Holcombe Road.

Special consideration should be given to the close proximity of the drug service and the vulnerable people in the immediate locality.

The area has an existing AGC which has itself seen crime in terms of criminal damage to the machines from frustrated customers and also staff being attacked by customers who have lost money. The premises operates with security guards in place in order to offer some protection for its staff members.

The location of the betting establishments in this regard provides for an environment in which gambling activity may be closely and prominently observed. Whilst we do not suggest that the applicant proposes to advertise in such a way as to make betting attractive to children, the LSC is asked to consider whether the location of this particular premises acts to normalise and thereby inadvertently promote gambling to children and young persons. And other vulnerable persons.

The close proximity of the drug outreach centre means that persons with substance misuse issues will be put to the test in making balanced and informed decisions and could potentially be drawn to gamble more in the hope of obtaining money to fund their addiction.

Within the Councils own Local area profile the location is deemed as being at high overall risk of gambling related harm, and generally considered inappropriate for further gambling establishments, which could potentially raise the risk of gambling related harm to vulnerable people living in this area. Operators are asked to consider very carefully whether seeking to locate new premises within this area would be consistent with the licensing objectives and the local risks identified.

Taking into account these matters the licensing authority take the view that there are insufficient conditions that could be offered to meet these concerns. Given these concerns in the locality the LSC is urged to not grant the licence.

If the LSC does not agree with this representation then we suggest that consideration be given to:

- • Reduced operating hours to ensure the premises operates between 8am and 10pm Monday – Saturday and 8am- 5pm –Sundays.

- • That an SIA security guard is stationed at the premises each day from noon until closing time.

- • That no lone working is done from noon until closing time each day.

1. A comprehensive CCTV system shall be installed and maintained on the premises as required by the Metropolitan Police Licensing Team. CCTV should cover the following:

- a) All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions
- b) The areas of the premises to which the public have access (excluding toilets)
- c) Gaming machines and the counter area

2. The CCTV shall continue to record activities 24 hour a day for 31 days.

3. CCTV shall be made available for the police viewing at any time with minimum delays when requested.

4. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.

5. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering exiting the premises.

Children and Young People

6. The Licensee shall maintain a bound and paginated 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.

7. Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.

8. Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.

9. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.

Entrances and Doors

10. A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable from the ground floor cashier counter by staff.

Staffing levels

11. There shall be no pre-planned single staffing at any time.

12. There will be a minimum of **2** staff present at all times when the premises is open.

Identification of Offenders or Problem Persons

13. The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.

14. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.

Seating

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

Alarms

16. The licensee shall install and maintain an intruder alarm on the premises.

17. The premises shall install and maintain a panic button behind the cashiers counter.

Toilets

18. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documented stating the time and member of staff who made the checks.

Signage, Promotional Material and Notices

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

Staff Training

20. The licensee shall: provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme. periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives. Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.

21. The Licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in this training shall be formally recorded and the records produced to the police or licensing authority upon request.

22. New and seasonal staff must attend induction training and receive refresher training every six months.

Homeless and Street Drinking

23. The Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.

24. The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.

Recording of Incidents and Visits

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

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

ATMs

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

Yours sincerely,

Daliah Barrett (Licensing Team Leader)

Haringey Council - Licensing Authority

Responsible retailing is actively encouraged in Haringey London.

Commercial and Operations

River Park House, level 1

High Road

Wood Green

London N22 7TR

T 0208 489 8232

E daliah.barrett@haringey.gov.uk [/licensing@haringey.gov.uk](mailto://licensing@haringey.gov.uk)

Rep 13

Public Health objection to Game Nation, 450-454 High Road, Tottenham, N17 9JN

Marlene D'Aguilar and Maria Ahmad
Health in All Policies Officer, Public Health
28th April 2020

Crime and Disorder, Public Nuisance and Public Safety

There are six schools and a children's centre located within 500-meter radius of the premises including Bruce Grove Primary, Holy Trinity Primary, Mulberry Primary, Welbourne Primary and Children's Centre, Assunnah Islamic School and Hyland House School,

There are already clusters of 5 betting shops on Tottenham High road within 500 meters.

Harriet Harman (2011) references Haringey Residents and Traders associations who highlight a vast divide in the borough of Haringey, where the 66 betting shops are split 85%/ 5% in an East / West divide, with the claim that betting shops are located in key geographic areas so as to deliberately target the poor.

The location of the proposed premises targets the poorer communities and it becomes harder for the health inequalities gap to close. If the application is to be granted it will not align with the Borough Plan to reduce health inequalities, create healthy spaces and neighbourhoods for children and give children the best start in life and will not demonstrate our preventative efforts to support families and enhance mental wellbeing.

Anti-social behaviour is particularly high in this ward. On the high road, near to the premises there were 549 crimes in the past year (March to April 2020), of which 280 (51%) were anti-social behaviour.

According to Gambling Commission (2018) briefing paper related to gambling-related harms on the community, it was pointed out the disastrous impacts of gambling on family relationships, and psychological and social development of children. Given the range of co-morbidities, it is highly likely that a percentage of those presenting with other conditions (e.g. mental ill health and addictions) are also either experiencing or are vulnerable to gambling-related harm. Evidence shows that certain people are more vulnerable to gambling-related harm, including those with substance misuse problems, poor mental health, and those living in deprived areas (Wardle et al., 2016). The location of the proposed gambling premise is situated within one of the most deprived area there is a commitment from the council to improve the lives and reduce health inequalities. The median household income in Tottenham Hale's is £27,340 a year. This is below the Haringey (£37,696) and London (£39,264) averages. Furthermore, 11.8% of St Ann's residents are unemployed. This is slightly higher than both the Haringey (8.6%) and London (7.3%) averages.

The premises are within close proximity to a drug treatment service (The Grove) which provided treatment services for 2,400 people approx., which has doubled in the previous year. Those individuals were at an increased risk of problem gambling and gambling related harm. Dr Pardeep Grewal, psychiatrist working at The Grove has previously highlighted concern of a gambling premise located near the treatment services and raised objection due to the potential negative impact on the vulnerable individuals suffering substance and alcohol addiction.

Research has proved that people living in areas with a higher number of bookies are more likely to be problem gamblers. London is seeing a 68% rise in violent crime associated with betting shops since 2010, according to the Metropolitan police. Another research reinforces the assertion that problem gambling is a significant issue within the homeless population, and is more commonly a cause than a consequence of homelessness (Sharman, Dreyer & Clark 2012).

Protecting Children from Harm

The premises fall within two of the school Superzone areas (Holy Trinity CofE and Earlsmead Primary School). This is a health and wellbeing zone around a school tackling issues such as gambling and its negative impact on children. Furthermore, The Bruce Grove Youth Centre located near the premises has previously raised concern on a proposed gambling premises at the same location and the negative impacts on young children and other vulnerable individuals accessing their centre.

Increased number of gambling shops in the concerned area not only severely undermines the objectives of the licensing, but it also normalises the harmful culture of gambling amongst children. Almost half a million children in England and Wales are gambling regularly, with about 55,000 estimated to have a serious problem. Suicide rates for gambling addicts are high, and gambling-related problems cause stress for individuals and families.

Between late 2019 to February 2020 focus groups of the three Superzone schools and one children's centre (<https://www.haringey.gov.uk/social-care-and-health/health/public-health/schools-superzones>) was conducted with children and parents about the local area. Parents and the children from year 1 to year 6 from Holy Trinity, Earlsmead and Welbourne primary schools and Children's Centre expressed concerns on an abundance of gambling shops on Tottenham High Street, which already attracts increasing anti-social behaviour, street drinking, drug dealing and loitering outside of these shops. They all want to see fewer gambling shops on the high street and felt that the gambling shops were exacerbating the problem of antisocial behaviour in the area. This concern finds sufficient backing in the researches which suggest that there is a link between gambling and alcohol/ drug abuse. (Griffiths, Parke & Wood, 2002); there were concerns regarding the number of gambling shops in Tottenham High Road and Broad Lane (Located off Tottenham High Rd) by primary school children from Year 1 – Year 6 parents.

The parents commented on the large volume of gambling shops in close proximity to each other and one parent expressed concern about the influence this would have on children and their development, with concerns raised about the possibility of enabling gambling addictions in the future.

"On Tottenham High Road, which we pass a lot there's like 10 betting shops, and there's 5 shops in between, so there is about 5 shops you get to a betting shop, another 5 you get to a betting shop" – Parent, Earlsmead Primary School

"I'm not going to lie I've seen a lot of young children outside these betting shops with these young guys that are selling drugs and constantly drinking" – Parent, Earlsmead Primary School
"And kids get desensitised, if they're 5 or 6 seeing that, so when they get older they just put a bet on, but if its away from your eye sight or vision, you can think about it. maybe go speak to mum and dad about it, but if you see it daily you're like you know what... Let me just put £10 on and see what happens, then the next day is £20, then you invite your friends' round and you've got a whole group of young kids doing it" -Parent, Earlsmead Primary School

The parents thought there are too many gambling shops in Tottenham, think more should be done regarding licensing and planning applications.

"The betting shops need to go" - Parent, Earlsmead Primary School

"Too many bookies, too many off-licenses, too many chicken shops in Haringey...you need to reduce the bookies, the off licenses and also the chicken shops because our children are growing up in this cycle, like a merry go round, not getting off it" – Parent, Holy Trinity

In summary, this undermines our key objective in the current borough plan *"A Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential"*. The effects of proposed gambling premises should be seen in the wider context of the well-being and overall health of the society, and as such, it is essential to take into account the legitimate objectives of licensing, concerns of the parents and the community's wellbeing. It is, therefore, strongly recommended that the Planning Committee refuse this application.

Rep 14

20.04.20

Regeneration Objection to licensing application for 24-hour adult gaming centre at 450-454 Tottenham High Road.

The Regeneration Service object to licensing application. The reasons for our objection is detailed underneath:

The Gambling Act 2005 sets out the objective to protect children from harm and other vulnerable persons from being harmed or exploited by gambling. Within the Haringey Statement of Gambling Policy, it states that the East of the borough carries higher deprivation and social economic imbalances and therefore should have special consideration given to it in relation to the proximity of gambling premises. Those special considerations listed in the Haringey statement are set out underneath along with our assessment for each as to why this licensing application fails to protect children and other venerable people from being harmed or exploited from gambling:

Close to an educational establishment, including colleges and universities, youth clubs, recreational establishments;

The applicant site is located in close proximity to a number of educational establishments that are all within 400 metres, these include Bruce Grove Primary School, Holy Trinity Church of England Primary School, Bruce Grove Youth centre. The proposals for 450-454 High Road are in direct conflict with the Public Health's new 'Super zone' around the Holy Trinity School, aimed at tackling gambling and other factors that could have a detrimental impact on health. The Super zone setup by Public Health is in recognition of the vulnerability of young people in the locality of the applicant site being susceptible to undue influences that would include gambling and especially gambling that is represented in format of games that is attractive young persons.

Close to a centre dealing with vulnerable people, including housing, clinics, recovery centre, food banks;

The applicant site is located within 400m of the Mulberry Junction. The launch of this new centre in Tottenham aims to reduce the number of people sleeping rough and is being delivered in partnership between Homes for Haringey and St Mungo's Housing Association. This centre is specifically targeted at single adults who experience homelessness or rough sleeping and offers a resource centre which provides holistic housing, health and skills support, as well as access to supported housing to help start their recovery and eventual move to suitable accommodation in the borough. The proximity of the applicant site to Mulberry Junction will pose a threat to the recovery of young person's staying at the Mulberry Junction by being directly exposed to the harms of gambling.

Situated in an area of high crime;

The local area profile for the Bruce Grove ward and specifically within the confines of the High Road from where the applicant site resides is identified as an area of high crime. Crime within betting shops is highest within the Borough for this location with 8 crimes recorded per betting shop in 2017. Due to Covid-19, the Metropolitan Police currently are unable to provide geographical mapping datasets for crime within the immediate locale of the applicant site. We are aware as a Regeneration Service through our regular liaisons with the Police, businesses and residents for Bruce Grove that there is a high volume of crime that happens within close proximity of the gambling premises. An example of where such issues already exist is Brook Street which is located within 200 metres of the applicant site and immediately adjacent to a cluster of betting shops along Bruce Grove High Road. Currently, Brook Street experiences frequent complaints from the Public as a

location for drug dealing and ASB. There is a correlation between those crime/ASB issues experienced on Brook Road and the proximity of betting shops, whereby often people will meet within the betting shops to negotiate and then move outside the premises to conduct crime that is out of sight from CCTV surveillance and from direct oversight by the Police. There is a greater risk from this application proceeding, in that, there is a narrow alleyway known as Albert Place that is more hidden and discrete than Brook Street and has no CCTV surveillance of the alleyway that is located directly outside the applicant site and providing a means of escape away from the High Road. Albert Place would provide an ideal haven for crime and ASB issues to take place away from any CCTV coverage on the High Road or within the applicants premises and would present a hostile environment for the Police and Enforcement Officers to manage and patrol.

Situated in an area of deprivation;

The Bruce Grove ward is listed in the highest ranks of deprivation indices when compared to other wards in the Borough and nationally. Bruce Grove has one of the highest number of Employment Support Allowance (ESA) claimants for Mental Health, it ranks highest in the borough for residents attending Citizens Advice in relation to debt matters and given this, the ward is in the highest quartile for deprivation indices when compared across the Borough.

In proximity to places of worship, community facilities or public buildings

The applicant site is located in close proximity to two large church congregations, these being: Christ Apostolic Church Outreach DDC HQ and St Marks Methodist church.

Areas where there is considered to be an over concentration of similar existing licensed operations.

There is already an oversaturation of gambling premises in close proximity to the application site at 450—454 High Road, namely: William Hill 438-444 High Road, Admiral Casino 475 High Road; BetFred 474 High Road, Ladbrokes 480 High Road and Paddy Power 486 High Road.

Close to the location of businesses providing instant access to cash such as payday loans, pawn shops.

There is cluster of pawn shops and payday loan centres within close proximity, one such example is the H&T pawnshop at No. 518 High Road.

In addition to the above, the Mayor London's Town Centres SPG Policy 4.8 states: 'Over-concentrations of betting shops ... can give rise to particular concerns.' And seeks to: 'prevent the loss of retail and related facilities that provide essential convenience, ... manage clusters of uses having regard to their positive and negative impacts' in particular to encourage: 'broader vitality and viability; diversity of offer; sense of place and local identity; community safety and security; promoting health and well-being'

The Regeneration Team therefore considers that granting a gambling premises licence would adversely affect the vitality and viability of the District Centre, as well as community safety, health and wellbeing. The proposed gambling premises is located in an area of high deprivation and would undermine the several improvement policies that the council and others are seeking to make to the area.'