

## Appendix 6 – Relevant Representations

**From:** Roye Chanel [<mailto:Chanel.Roye@haringey.gov.uk>] **On Behalf Of** Licensing

**Sent:** Friday, February 19, 2021 10:21

**To:** Paddy Whur <[paddy@woodswhur.co.uk](mailto:paddy@woodswhur.co.uk)>

**Subject:** LICENSING AUTHORITY REPRESENTATION- Application for a New Gambling Premises Licence - Little Vegas, 17 High Road, Wood Green, London, N22 6BH. (WK/487907)

**Importance:** High

Dear Sir,

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.

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. High Road Wood Green is a very busy town centre and 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 social issues arising from an increased presence of street begging rough sleepers and illegal street gambling. An adult gaming centre would certainly be a draw to these groups as place of shelter, it could potentially be a magnet to these individuals already finding it difficult to maintain any kind of day to day social interaction.

It is recognised that the location of the proposed premises is an important consideration. The unit is based along the High Road N22 which is a main thoroughfare for children and young people travelling to and from school or other activities, as well as for commuters using the nearby underground stations. Special consideration should be given to the close proximity of the vulnerable people in the immediate locality.

The area has existing AGCs which of themselves have 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 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.

Within the Council's 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, working and existing 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 takes 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 23pm Monday – Sunday including Bank Holidays.
- 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 hours 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.**

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## **POLICE REPRESENTATION**

**Type of Application:** New Premises Licence.

**I wish to make representation on the following:**

**Name and address of premises:**

**LITTLE VEGAS  
17 High Road, Wood Green ,N22 6BH**

### **Prevention of crime and disorder**

If this application were granted in full or part, I would recommend the following alterations be made to the licence conditions. I also suggest that additional conditions be attached to the licence, as set out below, to further promote the licensing objectives.

1. The premises shall install and maintain a comprehensive CCTV system. All entry and exit points must be covered enabling frontal identification of every person entering in a light condition including customer facing areas. The CCTV system shall continually record whilst the premises are open. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Subject to data protection legislation, recordings shall be made available upon the request of Police or authorised officer of the Licensing Authority.
2. A staff member from the premises who is conversant with the operation of the CCTV system shall be in the premises at all times when the premises is open.
3. Notices shall be prominently displayed within the premises stating that CCTV is in operation.
4. An incident log shall be kept at the premises and made available on request to an authorised officer of the Licensing Authority or the Police. Details to include:
  - a. all crimes reported to the venue
  - b. all ejections of patrons

- c. any complaints received concerning crime and disorder
  - d. any incidents of disorder
  - e. all seizures of drugs or offensive weapons
  - f. Any visit by a relevant authority or emergency service.
  - g. Any attempts by children and young persons to gain access to the premises to gamble
  - h. Any Challenge 25 Refusals.
5. A “think 25 proof of age scheme “ ,shall be operated at the premises where Any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry. Acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
6. Premises operating hours to ensure the premises operates between **0800 hours** and **2300 hours** Monday – Sunday including Bank Holidays due in part to residential properties situated above the premises.
7. Under the remit of prevention of crime and in the interest of deterrence that a suitably trained and qualified SIA security guard is posted to the premises each day from noon until 2300 hrs.

If these conditions were accepted in full I would withdraw my representation.

Officer: Derek Ewart  
Licensing Officer Haringey Police

[Matthew.Derek.H.Ewart@Met.Police.UK](mailto:Matthew.Derek.H.Ewart@Met.Police.UK)

Date: 19/02/2021



**Public Health Objection to Little Vegas, 109 High Road, Wood Green, London, N22 6BB**

Responsible Authority: Haringey Public Health, London Borough of Haringey

10<sup>th</sup> March 2021

I am writing as the Director of Public Health Responsible Authority in making this representation against the application for a new Adult Gaming Centre premises license: Little Vegas, 109 High Road, Wood Green, London, N22 6BB.

Public Health is 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.

Public Health has evaluated the area of which the premises is located. This proposal is at a vulnerable location with already 4 Adult Gaming Centres (AGCs) within 4 mins walk between and 6 betting shops on the high road. The over-concentration of gambling premises has a negative impact on the health and wellbeing of our residents. Furthermore, Noel Park Ward is ranked high in all risks associated with gambling-related harm and the vulnerable groups highlighted in this report suggests a strong need to safeguard the area from over-concentration of gambling premises, help to promote a healthy high street and retain a vibrant mix of uses in the town centre.



## Location



There are already 4 Adult Gaming Centres clustered on Wood Green High Road.

**Admiral Casino, Shop, 117 High Road, Wood Green, London, N22 6BB (1 min walk)**

**Admiral, 9 High Road, Wood Green, London, N22 6BH (0.2 mile, 4 min walk)**

**Betfred Shoppers Pride Amusement, 64 High Road, Wood Green, London, N22 6DH (1 min walk)**

**Palace Amusements, Shop, 49 High Road, Wood Green, London, N22 6BH (0.1 mile, 2 min walk)**

And 6 other gambling premises on Wood Green High Road

**Jenningsbet, 144 High Road, Wood Green, London, N22 6EB**

**Ladbrokes Betting Shops, 13 High Road, Wood Green, London, N22 6BH**

**Paddy Power, 33 High Road, Wood Green, London, N22 6BH**

**William Hill, 17 High Road, Wood Green, London, N22 6BH**

**Merkur Cashino, Shop, 91 High Road, Wood Green, London, N22 6BB**

The Noel Park Ward area is one of the most deprived areas in London and the proposal of another Adult Gaming Centre will make matters worse for the residents in terms of health and wellbeing.

Noel Park ranks high in all risk factors associated with gambling-related harm in individuals such as a Ward with high deprivation indices, increased number of residents on Universal Credit, high numbers of people who are rough sleeping, high percentage of residents from minority ethnic background, families from very low median household income, high unemployment rates, high level of long-term health condition and disability (which may include mental health issues).

An analysis of the number of gambling premises in Haringey illustrates there are 2.8 betting shops, adult gaming centres and bingo per 10,000 of the population (Table 1) which is much higher than the national average of 1.6 per 10,000<sup>1</sup>. At a Ward level, it shows Noel Park Ward has the highest number of gambling premises than the rest of the Wards, with nearly 14 premises per 10,000 of the population.

Table 1. Gambling premises (betting shops, adult gaming centres, bingo only) per 10,000 of population in Haringey.

Ward	Ward Population	Number of Betting shops, Gaming and Bingo	Adult centres	Premises per 10,000
Alexandra	11,758	1		0.9
Bounds Green	14,998	3		2
Bruce Grove	14,820	5		3.3
Crouch End	12,315	2		1.6
Fortis Green	6,341	2		3.1
Harringay	14,243	3		2.1
Highgate	10,713	0		0
Hornsey	13,003	2		1.5
Muswell Hill	10,636	0		0
<b>Noel Park</b>	<b>12,787</b>	<b>14</b>		<b>10.9</b>
Northumberland Park	9,224	6		6.5
Seven Sisters	17,744	3		1.6
St. Ann's	14,434	5		3.5
Stroud Green	11,568	0		0
Tottenham Green	16,516	4		2.4
Tottenham Hale	10,250	5		4.9
West Green	9,652	3		3.1
White Hart Lane	7,882	1		1.3
Woodside	10,724	5		4.7
	229,608	64		2.8

### Problem Gambling and Vulnerable Groups

There is strong research which gives a clearer picture of those who are likely to be more vulnerable to gambling harm<sup>2</sup>. Amongst the groups where the evidence base for vulnerability is strongest include those with a history of mental ill-health, substance abuse or gambling addiction; people with learning disabilities/difficulties; immigrants; homeless people; the unemployed or those on low

<sup>1</sup> According to the gambling commission there were 10,590 betting shops and bingo halls in the UK in March 2018, and according to population estimates by ONS the UK population in 2017 was 66.05 million; this gives a betting shop/bingo hall per 10,000 people of 1.6 <sup>(15)</sup>

<sup>2</sup> Gambling Commission (2016) Guidance to licensing authorities: 5th edition (September 2015, Parts 17, 18 & 19 updated September 2016). Retrieved 28 March 2019 from <https://www.gamblingcommission.gov.uk/PDF/GLA5.pdf>

income. This could include area-based vulnerability, such as demographics and areas of deprivation (London Council A 'whole council' approach to gambling, 2018)<sup>3</sup>.

### *Mental Health*

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

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

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

### *People Rough Sleeping*

Haringey has also seen an increase in the number of people who are rough sleeping with a range of overlapping and multiple disadvantages, such as addiction, poor physical and mental health, contact with institutions as children or adults and offending histories and experiences of trauma. In 2020, 280 Streetlink referrals (alerts raised by members of the public) were made about people sleeping rough in the N22 postcode and it was a key area of activity for the outreach team. This is up from 166 referrals about the same postcode area in 2019.

Gambling problems are more prevalent in the population facing homelessness than the general population, 11.4% of the homeless population is found to have problem gambling. 61.5% of participants with some level of gambling risk had problems before homelessness, 15.4% reported experiencing problems after homelessness (Sharman, et al. 2016)<sup>4</sup>.

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).

### *Substance Abuse*

There is frequently a link with alcohol or drugs as a way of coping with anxiety or depression caused by gambling problems (Griffiths, Parke & Wood, 2002). Availability of opportunities to gamble and the incidence of problem gambling within a community are known to be linked (Griffiths, 2003a; Abbott & Volberg, in press). As a result, the proposal use of the premise will attract a high level of residents who are highly dependent on alcohol and drugs.

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<sup>3</sup> [Gambling and Public Health.pdf \(londoncouncils.gov.uk\)](https://londoncouncils.gov.uk/gambling-and-public-health.pdf)

<sup>4</sup> Sharman, S., Dreyer, J., Clark, L., and Bowden-Jones, H. (2016) *Homeless and gambling: a complex relationship*. Available at: [http://eprints.lincoln.ac.uk/24974/1/CRS\\_Poster.pdf](http://eprints.lincoln.ac.uk/24974/1/CRS_Poster.pdf)

Wood Green is a key location known to have an open drug market for a number of years. The hotspots for arrests for drug offences in Haringey are Wood Green High Road, extending from Green Lanes / Bowes Road, southwards to Turnpike Lane (Metropolitan Police recorded crime data, 2018).

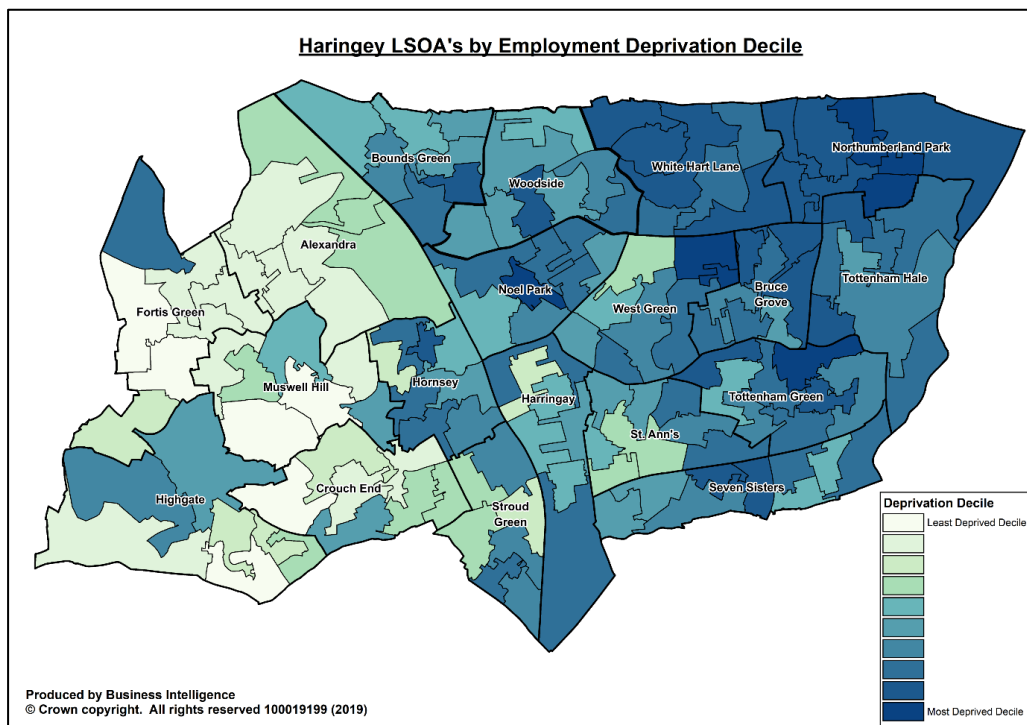
### *Unemployment or Low Income Groups*

Increase gambling outlets densely populated in the ward may cause gambling addiction which is likely to fuel lack of money for families in this Ward.

Noel Park Ward has the highest levels of employment deprivation in the borough (Figure 2). 10% of Noel Park residents are unemployed. This is above both the Haringey (8.6%) and London (7.3%) averages. In Noel Park, there are 288.7 claimants per 10,000 residents who claim benefit principally for the reason of being unemployed. This is above both the Haringey and London levels (251.8 per 10,000 residents and 201.7 per 10,000 residents respectively). The rate of claimants in Haringey is almost 25% higher than the London rate.

During COVID, Haringey experienced the largest increase in unemployment claimant for benefits among the 11 Central London Boroughs and has now become the 6<sup>th</sup> highest in the UK. Of those who were in work in February 6% (660 households) had lost their job by May 2019. Tottenham Hale and Noel Park were particularly badly hit relative to the working age population of those Wards. This has become during worse during COVID.

Figure 2. Pre-COVID employment deprivation



## Problem Gambling and Arcades

A study carried out in Brent suggests that the growth of gambling establishments, such as AGCs (Adult Gaming Centres) and betting shops, is particularly prominent in areas with high levels of social and economic deprivation<sup>5</sup>. A paper published in the Journal of Gambling Studies by social research institute NatCen in December 2012 showed that the greatest concentration of gambling machines could be found in Britain's most deprived areas, 'with the highest density of machines mirroring the profile of those most at risk of experiencing harm from gambling'<sup>6</sup>.

## Gambling Treatment services

In 2019/20, 29 clients in Haringey (postcodes in proximity to the premises - N22, N15, N8) contacted the Gambling treatment services of which 15 clients were under 35. 2 of the clients were frequent users of Fruit/slot machines (stakes up to £5) at an Arcade premise.

Table 1 shows the problems faced by the clients seeking gambling treatment services, of which few were frequent users of fruit/slot machines (stakes up to £5). The number of calls has increased by 23 in the last year.

2019-2020 Haringey	Description	Number of clients
	(Caller disconnected)	2
	(Not asked)	2
	Anxiety/Stress	23
	Criminal Activity	3
	Drug Misuse	2
	Family/Relationship Difficulties	16
	Feeling Isolated	10
	Financial Difficulties	16
	General Health	4
	Housing Problems	1
	Mental Health	9
	Suicidal	2
	Work Difficulties	1
Total		91

<sup>5</sup> A Fair Deal: Betting Shops, Adult Gaming Centres and Pawnbrokers in Brent.

<https://www.brent.gov.uk/media/9511196/A%20Fair%20Deal%20Betting%20Shops,%20Pay%20Day%20Loan%20Shops%20and%20Pawnbrokers%20in%20Brent.pdf>

<sup>6</sup> Heather Wardle, Research Director, Health and Wellbeing, NatCen, Betting shops blighting the high street? How, why and where and why?, <http://map.geofutures.com/dispatches/cutting/28/NatCenGamblingHarmCommentary.pdf>, August 2012

Table 1. Haringey clients living in N22, N15, N8 experiencing problems (GameCare, 2019/20).

	Gambling debt	Client count
	(Not disclosed)	2
	£10,000 to £14,999	2
	£15,000 to 19,999	1
	£20,000 to £99,999	2
	£5000 to £9,999	4
	Less than £5000	4
	None	6
	Some	5
	0	3
Total		29

Table 2. Haringey clients living in N22, N15, N8 experiencing different amounts of gambling debt.

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

Much of the focus on gambling-related crime tends to be upon problem gamblers. Criminal behaviour is most commonly associated with problem gamblers as problem gamblers spend more than their disposable income and often have to resort to criminal activity as a way of getting money to carry on gambling and repay associated debt problems<sup>7</sup>.

Noel Park Ward is in the 5% most crime deprived wards in England – ranked 6<sup>th</sup> in London respectively. The high level of crime impacts upon the quality of life of local residents and those using the area.

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

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

Between late 2019 to February 2020 children and parents focus groups were conducted as part of the Schools Superzone Project, <https://www.haringey.gov.uk/social-care-and-health/health/public-health/schools-superzones>). 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.

<sup>7</sup> [http://irep.ntu.ac.uk/id/eprint/3692/1/205959\\_8217%20Griffiths%20Publisher.pdf](http://irep.ntu.ac.uk/id/eprint/3692/1/205959_8217%20Griffiths%20Publisher.pdf)

### **Linking with the Borough Plan Priorities**

*“A Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential”.*

The location of the proposed premises targets the poorer communities and it becomes harder for the health inequalities gap to close. If the planning application is to be granted it will not align with the Borough Plan ([https://www.haringey.gov.uk/sites/haringeygovuk/files/borough\\_plan\\_2019-23.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/borough_plan_2019-23.pdf)) 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.

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 9am and 23pm Monday – Sunday including Bank Holidays.
- 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.



**From:** [Cllr James Sarah](#)  
**To:** [Licensing](#)  
**Subject:** New Gambling application - Little Vegas, 17 High Road, Wood Green, London, N22 6BH.  
**Date:** 10 March 2021 10:31:03

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As the Lead Member for Adults and Health, I am very concerned to see that there is a planning application for another new Adult Gaming Centre (AGC) on Wood Green High Road.

This will have an adverse effect on the health and wellbeing of our residents living in the area.

There are already a large number of gambling premises on the High Road with four other AGCs within a minute's walk and six betting shops.

Further to this we have also received a new planning application on another AGC on the Wood Green High Road last month and having another AGC will make Wood Green High Road even more of a centre for gambling.

There are good transport links on the High Road that many of our young and vulnerable people use frequently and more visible gambling premises increases their exposure. In addition, there are a high number of street drinkers and street beggars in the area and they often tend to congregate outside or near to gambling premises.

Wood Green High Road will face many challenges in regenerating itself in the wake of the pandemic, but it has a good basis on which to build as a local centre frequented by families and local residents.

This will be significantly damaged if more premises are converted to gambling establishments. With the density of such frontages along the High Road it will no longer feel like – or in reality be – a place for family shopping and entertainment and that can only have a negative impact on the long-term economic recovery of the area.

The proposal in this location is unsuitable and will not help the existing mental health challenges and financial difficulties our residents are experiencing especially when COVID has hit our most vulnerable residents so hard.

For these reasons I strongly oppose the opening of another AGC in the area.

Regards,  
Sarah

Sarah James  
Cabinet Member for Adults and Health  
Haringey Council  
Tel. 07976973859