

Appendix 6 – Relevant Representations

From: Zena Brabazon <>
Sent: 11 May 2021 13:57
To: Licensing <Licensing@haringey.gov.uk>
Cc: Cllr Brabazon Zena <Zena.Brabazon@haringey.gov.uk>
Subject: AGC licensing application 513 Green Lanes

Dear Daliah and Licensing

Please see below my representation regarding the premises license application for an Adult Gaming Centre 513 Green Lanes N4 1AN - 24hrs/day, 7 days a week

Please confirm receipt.

-
Thanks

Zena

Zena Brabazon
Cllr, Harringay ward

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Introduction

I am writing to you in my capacity as a Harringay ward councillor to object to the premises license application for an Adult Gaming Centre at 513 Green Lanes N4 1AN, to open 24hrs/day, 7 days a week.

I am concerned that this application would go 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

I set out my reasons below.

Crime and Disorder Issues

Premises with gaming machines provide 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. They also target vulnerable people. Green Lanes is an area with a significant number of vulnerable residents and the opening of yet another adult gaming centre in the

heart of Green Lanes, 24/7 is an issue of serious concern.

It is my understanding that many of the criminal damage cases are simply not reported. This may be due to gaming centres not wishing to record such occurrences for fear that their licence may be called in for review. There are links between crime and addiction and there is little doubt that some customers will be committing acquisitive crime in the local area to feed their addiction. Harringay ward is already a well-known hot-spot for drug dealing, including Class A drugs and residents have recently been reporting increased drug use and dealing in the area. This is being done openly along Ladder Roads which all feed into Green Lanes. Begging is on the increase as I have personally observed, and have reported to the police. As a result, all three of our Harringay Met Police Ward priorities are based around drug dealing in conjunction with other criminal behaviour. I agree with the Ladder Community Safety Partnership that a 24/7 gambling outlet in the centre of Green Lanes will act as a magnet for criminal activity.

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 and in my view, this is unacceptable and avoidable.

Children and Vulnerable Persons Issues

Haringey's Statement of Gambling Policy 2021-26 makes 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.

Vulnerable people

There are approximately 4,000 adults with severe mental illnesses living in Haringey – three times more than would be expected, even given Haringey's level of deprivation. There are three main reasons for these high numbers:

The proximity to the extensive mental health care facilities at St Ann's Hospital, which draws in vulnerable adults from a broad area of North London is a significant factor.

A high number of vulnerable adults living in community homes/supported living 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. A new facility/supported housing scheme for homeless women is due to be developed on the Ladder this financial year.

The prevalence of HMOs (Houses in Multiple Occupation) in Harringay ward is another reason for the high number of vulnerable people living around Green Lanes. Under the Council's Selective Licensing Scheme (currently under review but planned for introduction) 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 HMOs.

Begging is commonplace on Green Lanes, and as personally observed, on the increase. Those begging are highly vulnerable. Where substance abuse is a factor, 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.

An adult gaming centre in the centre of Green Lanes open 24/7 is there to encourage gambling, and will simply provide more temptation, through increased availability, for the very large number of vulnerable local adults in the area. Academic research confirms this, and one study (supported by Gamcare) noted how *the more marginalised and deprived are often the most susceptible to problem gambling and debt.*

Schools and Children

The site of the proposed betting shop is between North and South Harringay Primary Schools (Mattison and Falkland Roads respectively). There are also many other facilities for children nearby, for example in Cavendish Road, Woodlands Park Road and Blackboy Lane. As they are local schools and nurseries, 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 young people between 11 and 18 living in the area.

I am told that local parents have told the Ladder Community Safety Partnership that they do not want their children to be over-exposed to ever-increasing numbers of gambling premises including gaming centres on their way to and from school, or to the shops in Green Lanes, and they should not be presented as the norm.

Background concerns regarding this application and Green Lanes context

It is unclear to me why this application for a licence to facilitate 24/7 opening is being made. The applicants have already tried to secure planning approval for the same hours, but were refused permission (HGY/2020/1925). In their refusal, the Council stated that there would be an *'increase in general activity and associated noise and disturbance ... during anti-social hours, with potential for anti-social behaviour'* if 24/7 opening were to be allowed.

The applicants tried again with reduced hours of 09.00-23.00 daily, which was granted earlier this year (HGY/2021/0066). Were the Licensing Committee minded to allow 24/7, the premises could not lawfully open beyond the planning hours (which have, incidentally, been upheld on Appeal at another nearby AGC, at 48 Grand Parade). There appears to be no realistic prospect of 24/7 opening being allowed by Planning.

The proposed AGC is located in the heart of Green Lanes, close to all of the four existing betting shops, the almost adjacent and soon-to-be-opened AGC at 519 Green Lanes, and the existing AGC at 48 Grand Parade. Indeed three of these gambling outlets are extremely close (at 507 Green Lanes and another opposite, at 12 Grand Parade and the new AGC at 519 Green Lanes, noted above).

Whilst clustering of such premises in a small area is not in general a relevant representation the Council has made clear its concern about the proliferation and overconcentration of betting outlets. This has emerged as a relevant local issue (e.g. Development Management DPD p.77). Town Centres, such as Harringay Green Lanes, are particularly at risk because of this overconcentration. Although a planning document, this is a relevant context in licensing terms because of the late-night problems which this application will cause, e.g. more criminal activity, greater risk for vulnerable adults, increased problem gambling which are highly relevant licensing issues.

It is my view that a new gambling outlet in Green Lanes offering access to slot machines 24/7 will contravene two of the key licensing objectives and have a seriously deleterious

impact on the local area and community. Any 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; and there are real risks that vulnerable adults will be affected.

I ask you to reject this application for a 24/7 licence and draw your attention to the decision of 8 September 2020 in respect of the license for the new AGC at 519 Green Lanes.

Zena Brabazon
Cllr, Harringay ward



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From: [Barrett Daliah](#)
To: [Barrett Daliah](#)
Subject: FW: 513 Green Lanes, N4 1AN APP RESI REP
Date: 03 July 2021 19:18:42

Sent: 11 May 2021 12:55
To: Licensing <Licensing@haringey.gov.uk>
Subject: 513 Green Lanes, N4 1AN

Dear Haringey Council Licensing team

I live opposite 513 Green Lanes, N4 1AN.

I strongly object to the potential grant of an Adult Gaming Centre premises licence for the property at 513 Green Lanes, for the following reasons:

1. There are two other betting/gambling shops on this intersection alone (Ladbrokes and Paddy Power). There is also an adult casino further down Green Lanes, in addition to further betting shops. There are already far too many gambling and betting businesses on Green Lanes, and this will tip the character and atmosphere of this high street further towards gambling and betting - ruining Green Lanes' character as a family friendly food and shopping destination.
2. The concentration of gambling and betting shops in this area is wholly inappropriate, and frankly offensive. You do not see this kind of concentration in areas such as Angel, Chelsea, or even Crouch End and Highgate. The placement of these businesses in low-income areas is predatory and dangerous.
3. The opening hours proposed for this site are long. With the other gambling/betting shops in the area, I am very concerned about anti-social behaviour during the day and late at night.
4. There are a number of schools in the area, exposing a large number of children and young people to gambling, betting and anti-social behaviour.
5. There are a large number of vulnerable adults in the area. Their interests are not served by granting an application for another gambling/betting premises in this area. I do not believe that there are any measures that can be put in place by AGC that would mitigate this risk, especially when you take into consideration the concentration of betting and gambling businesses in the area.

For the reasons explained above, the only reasonable position is to refuse this licence application.

Please also note, that as a Haringey resident of over 5 years, I am incredibly disappointed that the related planning application for this site was approved, and that this licence application is even being considered. Yes, this site has been vacant for some time - this is not, however, a reasonable reason to allow the further encroachment of gambling and betting businesses on our high streets. At a time when these businesses are under intense scrutiny for the effect they have on vulnerable adults and indeed young people, and are being strongly criticised in the press for their business practices and predatory behaviour, it beggars belief that Haringey Council would be receptive to yet **another** business such as this on Green Lanes (especially as we have already been called out by name in articles

such as this: <https://www.bbc.com/news/magazine-22934305>).

Best
Nurul Shamir

LADDER COMMUNITY SAFETY PARTNERSHIP

c/o

Haringey Council Licensing Team
River Park House,
Level 1 North,
225 High Road,
Wood Green
London, N22 8HQ

6 May 2021

**Premises Licence: Betting: Adult Gaming Centre 513 Green Lanes N4 1AN
To open 24hrs/day, 7 days a week**

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 Haringay 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, Haringay, 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

However, before that we would like to note that we do not understand why this application for a licence to facilitate 24/7 opening is being made. This is because the applicants have

already tried to secure planning approval for the same hours, but were refused permission (HGY/2020/1925). In their refusal, the Council stated that there would be an *'increase in general activity and associated noise and disturbance ... during anti-social hours, with potential for anti-social behaviour'* if 24/7 opening were to be allowed.

The applicants tried again with reduced hours of 09.00-23.00 daily, which was granted earlier this year (HGY/2021/0066). So even if the Licensing Committee were minded to allow 24/7, the premises could not lawfully open beyond the planning hours (which have, incidentally, been upheld on Appeal at another nearby AGC, at 48 Grand Parade). There is therefore no realistic prospect of 24/7 opening being allowed by Planning.

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, the almost adjacent and soon-to-be-opened AGC at 519 Green Lanes, and the existing AGC at 48 Grand Parade. Indeed three of these gambling outlets are extremely close (at 507 Green Lanes and another opposite, at 12 Grand Parade and the new AGC at 519 Green Lanes, noted above).

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 Haringay 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 Haringay SNT police to improve security at vulnerable domestic properties throughout the Ladder roads in order to reduce the likelihood of burglary.

The Haringay 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 2021-26 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. Moreover there are approximately 4,000 adults with severe mental illnesses living in Harringay – three times more than would be expected, even given Harringay's level of deprivation (Ref 1)
- (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 but planned for

introduction) 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 2) noted how *>the more marginalised and deprived are often the most susceptible=* (to problem gambling and debt). We also need to wonder who would wish to gamble in the early hours of the morning, at 3am or 4am. It is surely the case that a problem gambler or vulnerable adult would be the most likely customer.

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.

All of these outcomes would be contrary to the fundamental aim of the borough Licensing Policy which is quite simply '*to ensure that licensed premises have a positive impact on their locality*' (Ref 3).

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. In addition, it would also be the same as the hours recently decided for the new AGC at 519 Green Lanes, by the Licensing Committee at the meeting on 8 September 2020.

Yours sincerely

Ian Sygrave

Chair, on behalf of the LCSP
Chair, on behalf of the Harringay Police Panel

Ref 1: Haringey Statement of Licensing Policy 2021-26, p.7. para 3.2

Ref 2: *Gambling and Debt Pathfinder Study 2009*, produced jointly by Manchester Metropolitan University, Gamcare, the Money Advice Trust and the Salvation Army

Ref 3: Haringey Statement of Licensing Policy 2021-26, p.8. para 3.6

On 11 May 2021, at 13:41, Max Clowes <> wrote:

To whom it may concern,

I am writing concerning the application by Admiral regarding 513 Green Lanes, N4 1AN. As per the council's report on 'The Gambling Profile of Haringey'[3], 'although gambling is a legal entertainment activity it can, in some locations have a negative impact on individuals and the wider community', and this licence should be rejected on public safety grounds.

As I understand it, this licensing application relates to planning application HGY/2021/0066. This proposed development, accompanied by this licence change, would add to the large number of gambling sites already situated on Green Lanes, as well as be the 3rd at that specific junction. This would result in Ladbrokes, Paddy Power, and now Admiral gambling centres all within 20 metres of one another. Given the aforementioned high concentration of gambling centres, the decision to add another seems clearly linked to the vulnerability of the community.

Green Lanes is a friendly and affordable high street, with a vibrant community with a particularly large amount of low-income participants. As an example, this site would be adjacent to a successful £1 store. The areas around Green Lanes are some of the 'most deprived' as per Haringey's recent State of the Borough report[2]. There are several nearby food banks in the area, and it is surrounded by a high number of Employment Support Allowance claimants. Low-income is a significant risk factor in gambling impact, and Haringey's own report of on the gambling profile of Haringey states that special consideration should be given to it in relation to the proximity of the gambling centre due to these reasons[3].

One other particular point the Haringey report raises is the risk based on proximity of businesses providing instant access to cash such as payday loans, pawn shops[3], of which Green Lanes has many. Additionally, the Gambling Commission report on gambling related harm[2] states that ethnic groups are particularly vulnerable to gambling harm, and Green Lanes is a hub for various ethnic groups.

Haringey's gambling report documents the concentration of crime around betting shops[3], with the nearby Turnpike Lane being one of the largest concentrations in the borough. This site's proximity to Turnpike Lane risks extending this crime hot-bed further down along Green Lanes.

Haringey's gambling report documents density of vulnerable persons[3], and this site falls in a highly ranked area. Haringey has higher rates of serious mental illness than many other London boroughs[1] - three times more than would be expected for the level of deprivation[3] - and the prevalence of these issues is growing year-on-year. It is important to note that this particular site is near several health care facilities, one being St. Ann's Hospital, which provides psychiatric care, and these patients also fall within those most vulnerable. This site is also near several school and recreational establishments.

Green Lanes is a high footfall area, but the gambling sites on this corner already see observably low footfall themselves. This development had previously been rejected under a previous application, HGY/2020/1925, with the only change with this latest application being the change of hours from 24/7 to 9-11pm. Clearly, the 24/7 hours would have been an important aspect in the business feasibility plan for the site. This modified plan, combined with the low numbers of gamblers, indicates that the profitability of this site will be wholly dependant on the custom of repeat, problem-gamblers.

Finally, the UK Gambling Commission states 'Local public health teams recognise gambling-related harm as a public health issue and its relevance in assessing risk to the wellbeing of their communities'[2]. It is key that Haringey Council recognise that granting a licence for a betting site at this location would be inappropriate by it's own priorities and analysis, and will cause significant public harm.

[1] https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf

[2] <https://www.gamblingcommission.gov.uk/PDF/Gambling-related-harm-as-a-public-health-issue.pdf>

[3]

<https://www.minutes.haringey.gov.uk/documents/s104896/The%20Gambling%20Profile%20of%20Haringey%20appendix%20%20nov%202018.pdf>

Yours faithfully,

Max Clowes