

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 has looked at the area of where the AGC is situated. Tottenham High Road is a very busy thoroughfare that runs between Hackney at one end to Enfield at the other end. It 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 consists of numerous social issues arising from an increased presence of street begging rough sleepers and illegal street gambling. An extension of hours to this premises will provide an additional 'harbour' late into the night for activity the Council and Police are working towards stamping out in this location. A later operation would certainly be a draw for these groups as a 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. Special consideration should be given to the close proximity of the vulnerable people in the immediate locality.

The venue is in Tottenham Hale Ward in the High Road with a similar venue opposite and nearby Betting Shops. This immediate area has been a crime generator for many years despite patrols and initiatives by the Safer Neighbourhood Team supported by specialist units and Community / Business Groups. Drug dealing is a serious concern and it is known they will loiter in the vicinity and attempt to frequent gambling venues to avoid enforcement and or inclement weather and to target potential clients despite the efforts of the venues to deter them. Drug dealing and street drinking add to the serious anti-social behaviour taking place in this immediate area.

Crime profiles for Betting Shops and similar venues show gaming machines and dealing with clients refused use of facilities generate crime which then leads to a requirement for Police attendance.

The Local Gambling Risk Assessment mentions crime statistics. It does not however include calls to Police not resulting in a crime report are not in the Assessment. Drug dealing, gangs and street drinking are not mentioned.

The concerns in this location have been the reason for a specific crime reduction strategy. The Safer Neighbourhood Teams working with local businesses and the Regeneration Team to combat the crime / anti-social behaviour concerns in this area. Extending the hours of operation will only exacerbate an already concerning situation despite the efforts of the venues owners and its staff to negate them. This concern relates to the venues location. If located away from this area concerns would potentially be lessened.

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.

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 to increase the operation to 24 hours

Licensing Authority