

From: Cllr Gordon Ruth <Ruth.Gordon@haringey.gov.uk>
Sent: 30 May 2022 15:35
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Game Nation 450 High Road, Tottenham N17 9JN

Dear licensing team,

I can see from the members' weekly notice that Game Nation has an application to vary the hours of operation. However, I cannot find the application in order to comment on it. Can you send me a link?

**Gambling Act 2005
Game Nation (AGC)
450 High Road
Tottenham
N17 9JN**

Application to vary the hours of operation to 24hrs - the last day of consultation is **23 June 2022**.

As a quick reminder the three licensing objectives which guide the consideration of applications under the Gambling Act 2005 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

Many thanks,

Ruth

**Cllr Ruth Gordon
Labour Member for Tottenham Hale Ward
Cabinet Member for house building, placemaking and development**

Mobile: [REDACTED]
Email Ruth.Gordon@haringey.gov.uk
Twitter: @HaleTottenham

From: [REDACTED] >
Sent: 30 May 2022 16:44
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Game Nation Objection

To whom it May Concern,

I understand there is an application to turn Game Nation into a 24-hour gambling centre. I write to register my opposition to these plans.

My concerns are three-fold:

- Gambling can be an incredibly damaging - members of my own family have suffered with gambling addictions. Extending opening hours would place vulnerable persons and potentially young people at risk of being harmed or exploited by gambling
- Gambling can be a source of crime and disorder in the area - extending opening hours would increase the already unacceptably high level of gambling-related crime.
- There are already far too many adult gaming centres in the area and they shouldn't be made easier to access.

Should you need my details, my name is [REDACTED] and I live at [REDACTED]
[REDACTED]

Many thanks,
[REDACTED]

From: [REDACTED] >

Sent: 30 May 2022 17:15

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

Subject: Re: FW: Application to Vary Gambling Premises Licence - Game Nation 450-454 High Road, Tottenham, London N17 9JD (WK/535773)

Dear Licensing team,

I am writing to express my concern at City Gaming Ltd's application to turn Game Nation into a 24 hour establishment. I strongly oppose this.

Under the Gambling Act, these two points are my main area of concern:

- **Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime.**
Local data shows that Tottenham already has high drug dealing, gangs and street drinking problems. In addition to this, over the last 2 years I have reported high levels of prostitution to the authorities - particularly along Tottenham High Road. Having a gambling centre open for 24 hours encourages vulnerable individuals to be out during anti-social hours, and I believe will contribute towards not just drug and alcohol related issues - but prostitution too. Opening day and night for 24 hours round the clock, Game Nation will exacerbate the crime and disorder in Tottenham.
- **Protecting children and other vulnerable persons from being harmed or exploited by gambling.**
Haringey Council's Local Area Profile produced in January 2019 highlights the area as being of high risk from gambling related harm. It further highlights that Haringey has high levels of severe and enduring mental illness. City Gaming acknowledges this is the case and their risk assessment attempts to address this issue through various means. Having read the risk assessment produced by City Gaming, in my opinion no points justify a change to their opening hours.

As a resident of N17, we are already experiencing enough trouble and disturbances at present and strongly disagree with any changes to opening hours.

Many thanks,

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: 30 May 2022 18:46

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

Subject: Game Nation license - oppose application to extend opening hours

TO

Daliah Barrett, Licensing Team Leader

And colleagues

licensing@haringey.gov.uk

Regarding the application for the variation of the adult gaming centre premises licence at Game Nation, 448-454 High Road, Tottenham

I believe Game Nation are seeking permission to open 24 hours. Currently, they must close by midnight Mon to Sat, and 11pm on Sundays.

The three licensing objectives which guide the consideration of applications under the Gambling Act 2005 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

I have concerns relating to this application which fall within the objectives listed above.

The Gambling Commission has introduced Social Responsibility code provisions that require operators of premises-based businesses to consider potential impact or harm from their gambling facility in an area.

Therefore, my major concerns are related to the **negative impact of longer opening hours** on local residents:

- We should work to prevent gambling from being a source of, *or encouragement for*, crime or disorder, or being used to support or facilitate crime
- We should work to prevent any chance of vulnerable persons being exploited by gambling

Unfortunately Tottenham is at a higher than normal risk of negative impact because of the higher than normal rates of alcohol and drug abuse, crime, mental illness, social deprivation, and resident vulnerable adults. In my opinion, Haringey already has too many adult gaming centres compared to other boroughs.

Perhaps if rates of alcohol and drug abuse, crime, mental illness **and** social deprivation all fall significantly in my area, then maybe Game Nation would like to reconsider their application.

But until such time, **I strongly oppose any extension to the opening hours of Game Nation.**

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED] >
Sent: 30 May 2022 19:26
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Objection to Game Nation

[REDACTED]

Hi there,

I am writing to you to share my objection to Game Nation being open 24 hours.

Tottenham High Street is already full of anti social behaviour, I have been followed, threatened and my partner and neighbours have been threatened.

There have been several studies linking gambling with anti social behaviour and I don't think we want to be encouraging more of this in this Borough, which already has a big problem with it anyway.

Many thanks

[REDACTED]

From: [REDACTED]
Sent: 30 May 2022 20:12
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Game Nation licence application

Dear Haringey Council licensing team,

My name is [REDACTED] and I live at [REDACTED].

I would like to object to Game Nation's request to become a 24 hours gambling centre.

My concerns have to relate to the following 3 areas:

- 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 2019 Haringey Council produced a Local Area Profile highlighting that Tottenham is at high risk from gambling related harm. By your own assessment, these kinds of establishments are detrimental to the area and making them 24 hours just extends the number of hours that people can be exploited by this company.

On the basis of this, I'd ask you to please reject their request.

Many thanks,

■

From: ■
Sent: 30 May 2022 20:56
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Objection to 24 hour licensing for Game Nation

Dear Sir or Madam

I am writing to object to the application for Game Nation to be allowed to be open 24 hours.

In 2019 Haringey council produced a Local Area Profile highlighting that Tottenham is at high risk from gambling related harm. There is no doubt Game Nation's presence on the high street will put people at risk from gambling harm. There is no reason for the establishment to be open for 24 hours, particularly given that is already open until midnight (far later than many other places on the High Street).

Granting permission would put residents at risk, encourage anti-social behaviour and at a time when people are suffering financially, put more people at more risk.

Please reject this application.

Kind regards

■

From: ■
Sent: 31 May 2022 11:18
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Objection to Game Nation opening 24 hours per day on Tottenham High Road

I'm writing to object to Game Nation opening 24 hours per day on Tottenham High Road

Having the Game National open all night will encourage more problem gambling and addictive behaviours. This means that it is not possible to ensuring that gambling is conducted in a fair way for customers.

A report says: "The results showed that of those identified by the survey as problem gamblers, one in five (19%) had thought about suicide in the past year, compared with 4% of non-problem gamblers/non-gamblers."

<https://www.gamblingcommission.gov.uk/news/article/new-analysis-shows-problem-gamblers-are-more-likely-than-others-to-have>

Problem gamblers are vulnerable, and will be exploited by extending opening hours.

Having a gambling establishment open 24 hours a day on the High Street may also need to disorder and noise for local residents

Regards,

[REDACTED]

From: [REDACTED]
Sent: 31 May 2022 11:44
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Objection for 24/7 game nation license request for high st n17

Hi there.

This a terrible idea for a deprived area with street ASB, gambling addiction, financial hardship and loitering outside betting shops an increased issue in the area.

We need to be closing these places down, not helping them to expand their revenue to the detriment of the local community

[REDACTED]

[REDACTED]

Sent from my iPhone

From: [REDACTED]
Sent: 31 May 2022 14:18
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Objection to the 24 hour opening times of Game Nation

Hello Haringey Licensing Team,

I live in the local area of Bruce Grove, Tottenham and it's come to my attention that the gambling shop 'Game Nation' situated on Tottenham High Road is proposing a 24 hour license/opening times. This is something is seriously object to for the following reasons:

- No gambling shop should be open 24 hours. Anyone gambling in the early hours of the morning (past midnight) obviously has a problem - gambling is not productive, healthy, or constructive to a nice area and 24-hour gambling at this venue would be harmful to the society and the area we live in. We need to protect the vulnerable in our society and extending the license here is exploiting them.

- Gambling is statistically proven to increase aggression and anti-social behavior. By extending the license for this shop you are only promoting anti-social behavior and aggression within the area. Extending the license at this shop will only increase crime and disorder in the area. If anything the license should be reduced in time so as to reduce disorder on Tottenham High Road.

- I have also seen numerous times, drugs being sold to punters coming out of and going back into Game Nation. When I asked the guy what he was selling the punters he told me stimulants - a common drug of choice for gamblers - I believe giving a 24-hour license to Game Nation will increase the crime on Tottenham High Road which I believe Game Nation is directly contributing to.

Best,

█

From: █
Sent: 31 May 2022 19:30
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Objection to Game Nation's permission to run 24 hours gambling centre

Name █
Address: █

I wish to oppose the licensing of Game Nation to run a 24 hours gambling centre.

My concerns relate to each of the following statements

1. preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime

In 2019 Haringey Council produced a Local Area Profile highlighting that Tottenham is at high risk from gambling-related harm

The risk posed from gambling-related harm in this area is higher than normal because of the higher than normal rates of alcohol and drug abuse, crime, mental illness and social deprivation.

Game Nation can not guarantee any "adequate staff training through E-Learning courses to mitigate increased physical violence, harassment, alcohol-related violence and drug abuse, as these require specialist training and skills such as psychological support, psychosocial support, armed response, medical and nursing response, and educational skills, safeguarding knowledge, which Game Nation are unlikely to offer their staff, especially not through e learning and not at the level that the harm will require. They should prove they do not support crime nor addiction in their clients.

3. protecting children and other vulnerable persons from being harmed or exploited by gambling

Gambling and gambling-like experiences are so widespread that **children see gambling as a normal part of everyday life**, including sport. And gambling advertisements send messages that gambling is fun, exciting and a way to join in with others and get rich easily.

Teenagers might think of gambling as a good social activity. This is because online gambling activities use chat and messaging to encourage people to bet with friends and share gambling stories. 55,000+ children addicted to gambling in the UK.

By having these Game Nation (and other gaming shops) open 24 hours a day (and opened at all!) you extend the exposure to and the opportunity to increase gambling addiction, and have devastating effect as soon as the children reach the age of 18 .and are legally authorised to enter the premises

By having game nation open at all times of the day and night gives even more exposure to carers and parents who could instead be at home with their children if they have any. The violence and economic issues related to gambling would then be passed on to children. Haringey has a duty of safeguarding.

600 lives are lost each year by suicide caused by gambling debt
Since 2020 gambling awareness should be included as part of PSHE. How can you justify authorising licensing these premises on one hand whilst you have the duty to educate against it on the other hand?

Many thanks

[REDACTED]

From: Cllr Brabazon Zena <Zena.Brabazon@haringey.gov.uk>
Sent: 04 June 2022 19:22
To: Barrett Daliah <Daliah.Barrett@haringey.gov.uk>; Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: FW: Application to Vary Gambling Premises Licence - Game Nation 450-454 High Road, Tottenham, London N17 9JD (WK/535773)

Dear Daliah

I am writing to formally object to the application by Game Nation to vary its adult gaming license for its premise at 450-454 High Road, Tottenham, N17 9JD. I am a local resident and also Cabinet Member for Children, Schools and Families.

This centre is very prominently located on Tottenham High Rad, and under its current license is open from 9am-midnight Monday to Saturday and until 11pm on Sundays. These very long hours seem to me to be sufficient.

In drafting my objection I have taken account of the Council's Statement of Gambling Policy and in particular the local area profile (January 2022) which is linked to the policy. I fully appreciate the need for balance in determining applications and welcome the policy which recognises the impact that gambling can have on vulnerable people, especially those living in poorer areas where gambling premises tend to be established.

Tottenham High Road is no exception in that regard, with several betting shops nearby to Game Nation and another adult gaming centre almost opposite. It seems to me that the issue here is whether this extension of hours to create a seven day a week, 24 hour gaming centre on Tottenham High Road is acceptable, given the area profile which lists both Tottenham Hale and Bruce Grove wards (now Tottenham Central) **as most vulnerable to gambling related harm**. As the Local Area Profile states **'These areas have been chosen 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***
- ***Mental health support accommodation***

Game Nation's updated local area risk assessment sets out the mitigations of risk to the most vulnerable. However these are largely technical and administrative in nature., relating to the management of the centre and processes to be followed. Yet the key issue, it seems to me is whether vulnerable people will be protected from harm or exploited by gambling, (which is a statutory licensing objective), if this variation is granted to enable people to gamble effectively 24 hours a day, seven days a week.

To put this in context, the whole country is now facing a cost of living crisis. Tottenham is no exception to this and it is likely our residents will face even more hardship with the exponential rise in energy and other costs. As a council, we have budgeted to provide over 500 primary school children with free school meals where their families do not meet the government's eligibility requirements, but where the families cannot make ends meet.

Indeed, Tottenham saw one of the largest increases in people applying for universal credit during the pandemic. On every indicator – economic, social and health - set out in the local area profile, things got worse during Covid. We have seen inequalities increase during the last two years. Mental ill health has risen, indebtedness is endemic with many people on housing benefit in severe debt.

The Local area profile provides the data to confirm this. It is against this backdrop that any variation to the current license should be considered, and whether it is acceptable to make gambling even more accessible for people in Tottenham.

I appreciate that Game Nation have listed many facilities which support vulnerable people in their risk assessment but regrettably there are even more. The Probation Service which sees vulnerable offenders is located on Lordship Lane and this should be of concern. There are hugely busy food banks at Tottenham Town Hall, at the 7th Day Adventist Church on Philip Lane and in Northumberland Park. The Tottenham Law Centre is also just a short walk away on Holcombe Road, and Mulberry Junction Homelessness Centre is underneath the St Mungo's provision already mention. In addition, there are rough sleepers on Tottenham High Road, some in the immediate vicinity of this gaming centre .

Combined with the list in the risk assessment, and indeed the evidence of increasing social and economic deprivation, would extending the already long hours have no impact on vulnerable people, including children, from being exploited or harmed?

Regards

Zena

Cllr Zena Brabazon
Cabinet Member, Children, Schools and Families

From: [REDACTED]

Sent: 21 June 2022 15:23

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

Subject: Game nation 450-454 high road tottenhamlondon n17 9 JD

WK/535773

Thank you for e-mail with regards to the above,I was very

dissappointed when permission was given for game nation to operate in Tottenham reported to be one of the poorest borough's,I therefore I object to permission for 24 hours opening adding more problems to the vulnerable

your sincerely

[REDACTED]

From: [REDACTED]
Sent: 21 June 2022 15:40
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Game Nation 24 Hour License

I am writing as a concerned Tottenham resident about the application from Game Nation to turn the venue at Bruce Grove into a 24 hour gambling centre.

I strongly object to this on the grounds of increased anti-social behaviour. Tottenham High Road is blighted by Gaming and Betting shops and the last thing we need is another 24 hour venue. Gambling in areas of high poverty and deprivation like Tottenham just create more problems for the area.

We also need to protect children and other vulnerable persons from being harmed or exploited by gambling.

Ensure that gambling is conducted in a fair and open way.

Prevent gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime.

I will be extremely disappointed if Haringey Council give the go ahead for this license.

[REDACTED]

From: [REDACTED]
Sent: 22 June 2022 14:31
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Game Nation 24hr licence objection

Dear sir/madam,

I found out that Game Nation wish to operate for 24hrs a day and I have grave concerns about this.

I work with homeless and marginalised people and am well aware of the harm that problem gambling can cause to individuals, their families and to a community as a whole. Although gambling can be done online 24hrs a day, this is not open to everyone. For example, if they don't have the right ID or a bank account. In a place like Tottenham, this is the case for many people whom I know, and many more others whom I don't, who are problem gamblers. Having a point at which they can no long gamble every day is essential and

perhaps even act as an opportunity to reassess behaviour. having an place that is always open would be extremely detrimental, even if this is not the kind of gambling that these people would normally do.

Furthermore, gaming machines are designed to be very addictive and for winning to be impossible. Having this place open if someone is desperate is a recipe for disaster.

I'm sure others have written to you about the ubiquity of betting shops, gaming shops etc in Tottenham, and how concentrated they are in an area of deprivation and that this is a deliberate strategy by companies seeking to benefit financially from people's vulnerability and financial insecurity. Quite frankly it's disgusting.

Game Nation, if operating 24hrs, would become one of the only 'always open' places on the High Road, attracting potential predators and others who might prey on those who are in a vulnerable situation. It would be out of keeping with other licencing hours.

I hope Haringey Council will see that it is only the owners of Game Nation who will benefit from this. Not the staff, nor the local economy, nor the community. Therefore, I hope you will refuse the licence.

Kind regards,

