

## **Objection to Application to Vary a Premises Licence under the Gambling Act 2005: Adult Gaming Centre**

Game Nation, Unit 1, 450-454 High Road is within Bruce Grove District Centre, where significant investment is being made to improve the District Centre as part of Haringey Council's Strategy for Tottenham High Road (2019-2029). The Regeneration Team objects to the Application to vary a premises licence in respect of: crime and disorder, protection of children from harm, and the overall vitality and safety of Bruce Grove District Centre. The premises is located in an area of high deprivation (10% most deprived area in the country) and crime, and the proposed variation to the licence would undermine the improvements that the council and others are seeking to make to the area.

### **The prevention of gambling being a source of crime and disorder, being associated with crime or disorder, or being used to support crime**

There is already a cluster of five gambling premises in close proximity to the application site at 450—454 High Road, namely:

- Ladbrokes, Betting Office, 480 High Road, Tottenham, London, N17 9JF (338 ft, less than 1 min walk)
- Ladbrokes, 529-535 High Road, Tottenham, London, N17 6SB (0.1 miles, 3 min walk)
- William Hill, 440, 440-442 High Road, Tottenham, London, N17 9JB (171 ft, less than 1 min walk)
- Paddy Power, 486 High Road, Tottenham, London, N17 9JF (308ft, less than 1 min walk)
- Admiral Adult Gaming Centre, 475A High Road, Tottenham, London, N17 6QA (161 ft, less than 1 min walk).

The gambling premises present an inactive frontage on the High Road, reducing passive surveillance and making the townscape more hostile and less welcoming.

In relation to the dominance of gambling premises in the local area and the Gambling Act 2005, we are liaising with the police via the Haringey Partnership Problem Solving Group over concerns about anti-social behaviour in the Bruce Grove local centre, where noisy groups frequently congregate outside betting shops.

Drug dealing and drug use, gangs and street drinking are a particular problem in the area, with a noted issue of gang members fleeing into betting shops and adult gaming centres as places of sanctuary.

A recent [report](#) has identified that Bruce Grove and Tottenham Hale Wards have a high prevalence of crime relating to betting shops and are acutely vulnerable to gambling-related harms.

The variation to the premises licence would extend the hours of operation of the adult gaming centre and therefore extend the associated crime and disorder, with a detrimental effect on public safety.

### **The protection of children from harm**

The Application is in direct conflict with Public Health's School Superzones around the Holy Trinity School, Welbourne primary school and Children's centre and Earlsmead primary school aimed at

tackling gambling and other environmental factors that could have a detrimental impact on the health of children and young people.

There are a further six primary schools, two pre-schools and five secondary schools within a short distance of 450-454 High Road.

### **District Centre vitality and safety**

The retail survey at Bruce Grove summarised in the Strategy for Tottenham High Road (2019) states that the offer is 'dominated by hairdressers/hair supplies and betting shops'. The Soundings consultation report from 2014 headline findings include: 'people wanted fewer betting shops'. The Development Management DPD 2017 Policy DM46 B is specifically referenced in the Strategy as seeking: 'to address the proliferation of betting shops', which are already dominant in the area.

In addition, 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: '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 the proposed variation to the gambling premises licence would adversely affect the local area in terms of promoting crime and disorder, harm to children, and threatening the District Centre's vitality, community safety, health and wellbeing.

Yours sincerely

Regeneration Team, Haringey Council