

Public Health Objection to Game Nation, 450-454 High Road, Tottenham, N17 9JD

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Objection to licensing application to vary Adult Gaming Centre, Game Nation, 450-454 High Road, Tottenham, London, N17 9JD:

Remove condition 1 on the current Premises Licence which states: The opening hours of the premises to be limited to 0900 to 2400 on Monday – Saturday and 0900 to 2300 on Sundays.

Summary

This objection to the above licensing application is made on behalf of the Public Health Team. The grounds for objection is the location of the premises being in a deprived area, close to the facilities accessed by our vulnerable residents and the concentration of other gambling premises in an area where the risk of gambling related harm is already high. An extension of the licence will most likely affect vulnerable people.. The effects of the proposed gambling premises should be seen in the wider context of the well-being and overall health of the society, and as such, it is essential to take into account the legitimate objectives of licensing. Our preventative efforts to develop a public health campaign to address gambling-related harm, concerns of the parents and the community's wellbeing. It is, therefore, strongly recommended that the Licensing Committee refuse this application.

We are concerned the following licensing objectives will not be upheld:

- 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.

Gambling-related Harm in Haringey

According to the Gambling Commission (2018) briefing paper related to gambling-related harms on the community, it was pointed out the disastrous impacts of gambling on family relationships, and psychological and social development of children. Given the range of co-morbidities, it is highly likely that a percentage of those presenting with other conditions (e.g. mental ill health and addictions) are also either experiencing or are vulnerable to gambling-related harm. Evidence shows that certain people are more vulnerable to gambling-related harm, including those with substance misuse problems, poor mental health, and those living in deprived areas (Wardle et al., 2016). The location of the proposed gambling premise is situated within one of the most deprived areas, there is a commitment from the council to improve the lives and reduce health inequalities.

Research has proved that people living in areas with a higher number of bookies are more likely to be problem gamblers. 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).

We must recognise that gambling does not place the onus on individual responsibility, but instead it can be a health harming activity to anyone because of the addictive nature of products, their ease of access, and the way they are promoted.

There is strong research which gives a clearer picture of those who are likely to be more vulnerable to gambling harm. 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 income. This could include area-based vulnerability, such as demographics and areas of deprivation (London Council A 'whole council' approach to gambling, 2018).

Prevalence

It is estimated 115,452 Haringey residents and 10,218 young people (ages 16-24) take part in some form of gambling based on the reported national percentages.

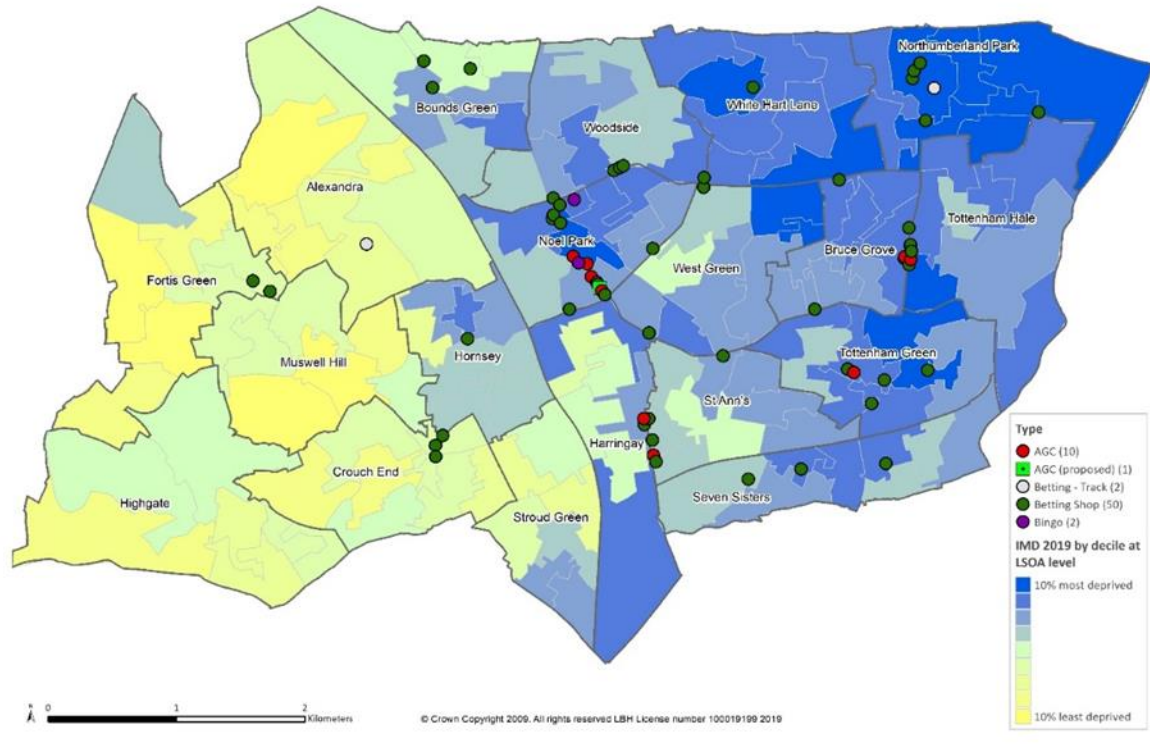
Approximately 145 patients in total are receiving NHS gambling addiction treatment in Haringey. Highlighting there is a gambling addiction problem in Haringey.

The Public Health team has estimated the annual gambling harm to be £1,345,055 - £1,649,311. This includes costs to primary health care, homelessness, unemployment, and the criminal justice system. Although, this is not a direct cost and it is not easily measurable, we are able to use the factors affecting a problem gambler as a co-morbidity to estimate the associated costs.

Public Health Campaign

Haringey Council is working on a public health campaign to tackle gambling-related harms in the borough to raise awareness. Extending the hours of a gambling premises in a deprived area where there are high concentrations of gambling premises, undermines the efforts we currently doing to prevent gambling-related harms in the population, particularly among our vulnerable residents.

Location



We currently have 50 betting shops, 10 Adult Gaming Centres, 2 Bingo premises and 2 track betting premises (2020). Gambling is a pressing health inequalities issue. More deprived wards have higher number of betting shops, adult gaming centres and bingo and this is linked to deprivation levels.

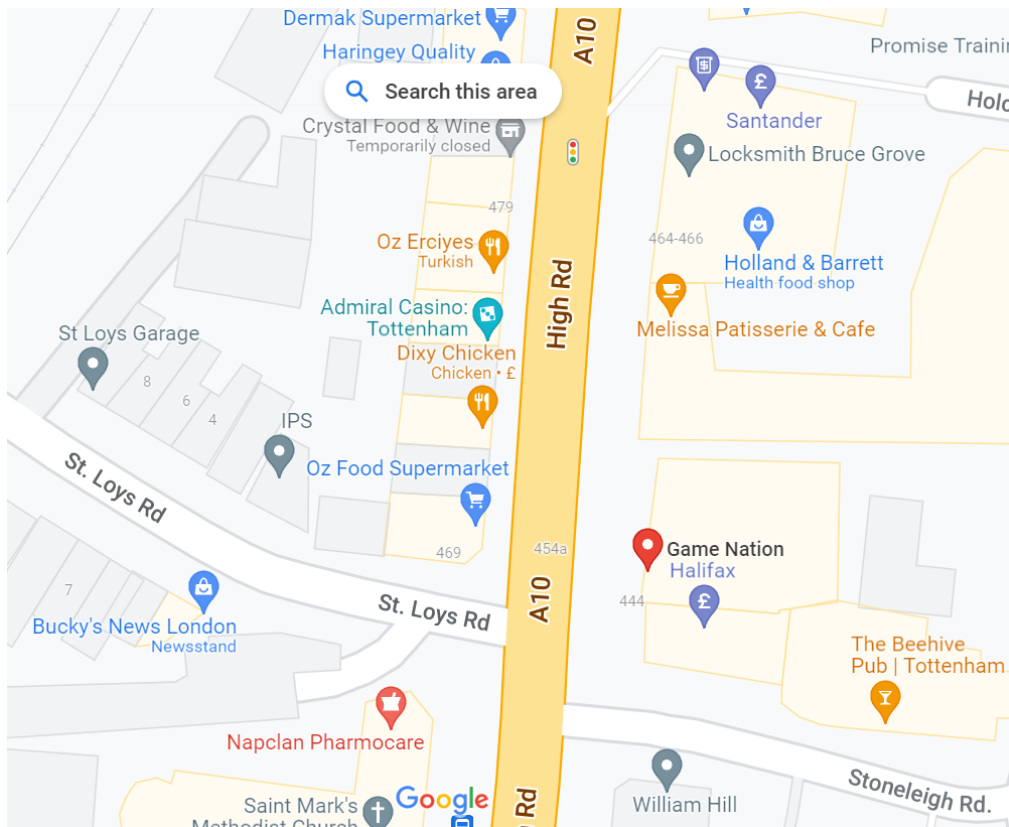
There are 7 gambling establishments in the West and 57 in the Central/East of the borough.

A study carried out in Brent suggests that the growth of gambling establishments, such as Adult Gaming Centres (AGCs) and betting shops, is particularly prominent in areas with high levels of social and economic deprivation¹. 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'².

¹ 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>

² 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



There are already clusters of 5 gambling premises on Tottenham High Road within 0.5 miles. An analysis of the number of gambling premises in Tottenham Hale illustrates there is a high number of gambling premises in the ward, with nearly 5 premises per 10,000 of the population.

Betting office

Ladbrokes, Betting Office, 480 High Road, Tottenham, London, N17 9JF. (338 ft, less than 1 min walk)

Betting shops

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)

Adult Gaming Centre

Admiral, 475A High Road, Tottenham, London, N17 6QA. (161 ft, less than 1 min walk)

Other facilities

H&T Pawnbrokers (0.2 miles, 1 min walk)

Banks - Halifax located one door down from Game Nation, Santander

ATMs – Santander, Post Office

Bruce Grove Post Office

Public Houses x 3– Beehive, The Ship and Elbow Room

There are 6 on-licenses and 4 off-licenses within the LSOA of the premises and there have been 25 alcohol related ambulance callouts within close proximity of the premises, which is significantly higher than the Haringey averages. This highlights the significant amount of alcohol related harm in the area.

Schools and Youth Centre

There are six schools and a children’s centre located within 500-meter radius of the premises including Bruce Grove Primary, Holy Trinity Primary, Mulberry Primary, Welbourne Primary and Children’s Centre, Assunnah Islamic School and Hyland House School.

The area has good extensive transport links such as bus stops located close to the premises and Bruce Grove overground station, which is used by children and young people travelling to and from school or other activities. 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. A report written by Ipsos on behalf of GambleAware, highlighted 70% of children and young people (aged 11-24) self-reported exposure to gambling advertising through shops on the high street.³ Extending the licensing hours especially during school opening hours, when children are travelling to and from school, will increase children’s exposure to the shop front and draw their attention to Game Nation’s digital front screens.

Secondary Schools, Sixth Form and Colleges

North London College, Ambitious College (specialist college), The College of Haringey, Enfield and N E London, National College of Digital skills and the London College of Law, Harris Academy and Park View Sixth Form.

Substance Misuse Treatment services

The premises is within close proximity to a drug treatment service (The Grove), which provides treatment services for 978 people approx. (2020-21). There is evidence to show links 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 proposed use of the premise is likely to attract a high level of residents who are highly dependent on alcohol and drugs.

³ <https://www.ipsos.com/sites/default/files/ct/publication/documents/2020-03/gambling-marketing-advertising-effect-young-people-exec-summary.pdf>

Dr Pardeep Grewal, Psychiatrist, working at The Grove has previously highlighted concern of a gambling premise located near the treatment services and raised objection due to the potential negative impact on the vulnerable individuals suffering substance and alcohol addiction.

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 average (22.5 per 1,000) and England (27.3 per 1,000) (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.

Unemployment

The median household income in Tottenham Hale's is £27,340 a year. This is below the Haringey (£37,696) and London (£39,264) averages. Furthermore, 11.8% of Tottenham Hale are unemployed. This is slightly higher than both the Haringey (8.6%) and London (7.3%) averages.

During COVID, Haringey experienced the largest increase in unemployment claimant for benefits among the 11 Central London Boroughs and has now become the 6th highest in the UK. Of those who were in work in February, 6% (660 households) had lost their job by May 2019.

Academics at the University of Oxford tracked the links between gambling spend and problems experienced by 6.5 million Lloyds Banking Group customers over seven years (not exclusive to remote gambling). The top 1% of gamblers spent 58% of their income and one in ten spent 8% on gambling. People who bet even relatively small sums were more likely to suffer financial hardship and unemployment, while heavier gamblers died earlier. Once a person spent 3.6% of monthly outgoings on gambling, they were one third more likely to miss a mortgage payment, 22% more likely to use an unplanned overdraft, and 19% more likely to take a payday loan. The researchers also traced gambling spend over a seven-year period, identifying increased rates of unemployment, disability and "substantially increased mortality" at the highest levels of gambling.

Further to this research, the gambling premises is located closely to few banks and ATMs on the high road, which provides problem gamblers an easy access to obtain cash to be used at the Adult Gaming Centre.

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

Anti-social behaviour is particularly high in this ward. On part of the high road, near to the premises (approx. 250 meters radius around the premises) there were 304 crimes in the past year (March 2021 to April 2022), of which 39 (12.8%) were anti-social behaviour. The rate of crime in Haringey is more than 18% above the London rate. The high level of crime impacts upon the quality of life of local residents and those using the area.

Much of the focus on gambling-related crime tends to be upon problem gamblers. Criminal behaviour is most commonly associated with problem gamblers as they 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 problems⁴. Gambling related offending may include fraud, theft, domestic and financial abuse, and links into wider criminal circles too. Research studies internationally have also found that prison populations are more vulnerable than the general population to disordered gambling and other gambling-related harms (GamCare,2020).

Commission on Crime and Gambling Related Harms in 2019, GamCare's criminal justice related service user data (GamCare, 2019:11) showed that⁵:

- In the 18 months to December 2019 there were 262 referrals from criminal justice sources (probation, prisons, police) to GamCare for treatment screening
- The majority (77 per cent, n = 201) of criminal justice-based referrals were from prisons
- 1,034 service users who accessed GamCare treatment in the 18 months to December 2019 reported criminal activity as an impact of their gambling
- In 2018/19, 484 callers to the National Gambling Helpline disclosed criminal activity as an impact of gambling, with 30 of these being an affected other. 98 Helpline callers disclosed domestic abuse as an impact of gambling, with 53 of these (over half) being affected others.

Protecting Children from Harm

The premises fall within two of the school Superzone areas (Holy Trinity CofE and Earlsmead Primary School). This is a health and wellbeing zone around a school tackling issues such as gambling and its negative impact on children. Furthermore, The Bruce Grove Youth Centre located near the premises has previously raised concern on a proposed gambling premises at the same location and the negative impacts on young children and other vulnerable individuals accessing their centre.

Increased number of gambling shops in the concerned area not only severely undermines the objectives of the licensing, but it also normalises the harmful culture of gambling amongst children. Almost half a million children in England and Wales are gambling regularly, with about 55,000 estimated to have a serious problem. Suicide rates for gambling addicts are high, and gambling-related problems cause stress for individuals and families.

Between late 2019 to February 2020, we carried out focus groups of the three Superzone schools and one children's centre (<https://www.haringey.gov.uk/social-care-and-health/health/public-health/schools-superzones>) was conducted with children and parents about the local area. Parents and the children from year 1 to year 6 from Holy Trinity, Earlsmead and Welbourne primary schools and Children's Centre expressed concerns on an abundance of gambling shops on Tottenham High Street, which already attracts increasing anti-social behaviour, street drinking, drug dealing and loitering outside of these shops. They all want to see fewer gambling shops on the high street and felt that the gambling shops were exacerbating the problem of antisocial behaviour in the area. This concern finds sufficient backing in the research which suggest that there is a link between gambling

⁴ http://irep.ntu.ac.uk/id/eprint/3692/1/205959_8217%20Griffiths%20Publisher.pdf

⁵ <https://howardleague.org/wp-content/uploads/2022/06/Police-awareness-and-practice-report-FINAL.pdf>

and alcohol/ drug abuse (Griffiths, Parke & Wood, 2002). There were concerns regarding the number of gambling shops in Tottenham High Road and Broad Lane (located off Tottenham High Rd) by both Year 1 – Year 6 primary school children and parents whose children attended these schools and children’s centre.

If this licensing application is not rejected, we suggest that consideration be given to:

- No digital gambling advertising and sponsorship especially on the shop frontage (if any) to protect young people from exposure to gambling. We would like to see safer gambling messages being promoted.
- No illumination of the signage
- The applicant shall take reasonable steps to prevent nuisance directly outside the premises.