



**Public Health objection to Future Leisure Limited, 519 Green Lanes. London, N4 1AN**

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19<sup>th</sup> December 2024

**Application to Vary Gambling Premises Licence - Future Leisure, Shop, 519 Green Lanes, Hornsey, London, N4 1AN. (WK/616711)**

**Introduction**

There are as many as 8,000 people experiencing gambling harms in Haringey, with another 25,000 people (including family and friends) affected more widely by these harms. In 2023, it was estimated that the borough lost over £8 million in fiscal costs due to the associated harmful gambling and this does not consider personal and family losses. In Haringey, we have a young population, which remains vulnerable to these harms. Our role in Public Health is to reduce health inequalities and our evidence demonstrates that gambling-related harms widens these inequalities in particular in areas where high levels of deprivation exist. Public health prioritises primary prevention to safeguard our residents throughout their lives, protecting them from health issues that could hinder their potential now and in the future.

**Summary of objection**

Public Health object to the removal of the condition Restrict the times of operation to 9 a.m. to 11 p.m. that would mean the premise is licensed to operate 24/7, for the below reasons:

1. The location and impact on local vulnerable population.
2. Antisocial behaviour & crime.
3. Does not align with local policy and fulfil the licencing objective to protect children and vulnerable adults.

**1. Location and impact on local population**

The over-concentration of gambling premises has a negative impact on the health and wellbeing of our residents. There are already 4 betting shops on Green Lanes within 500 meters of this premises. Wood Green is ranked high in all risks associated with gambling-related harm (e.g. poverty, unemployment and mental health), there is a need to safeguard the area from further exposure to gambling harms and encourage a healthier high street.

Harriet Harman (2011) references Haringey Residents and Traders Associations who highlight a vast divide in the borough of Haringey, where the 64-gambling premises are split 57 in the East and 7 in the

West, with the claim that gambling premises are in key geographic areas to deliberately target the more deprived parts of the borough.

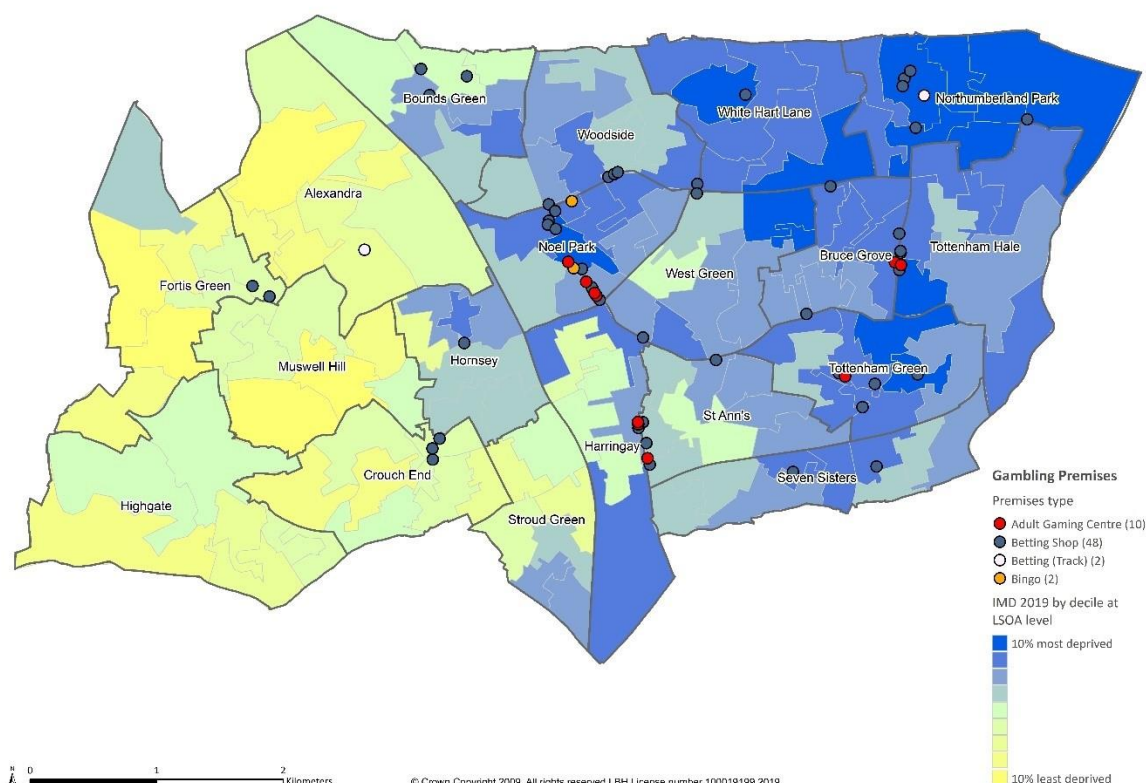


Figure 1. Map of the location of gambling premises in Haringey, 2023.

**The above map highlights the location of gambling premises and deprivation in Haringey, the darker blue the higher the deprivation.**

In Harringay Ward 2023, there were 263.2 claimants (inc. universal credit and JSA) per 10,000 residents who claim benefit principally for the reason of being unemployed. This is substantially higher than the London rate (201.7 per 10,000 residents), and while it is slightly higher than the Haringey level (251.8 per 10,000 residents). The rate of claimants in Harringay is almost 25% higher than the London rate. Gambling addiction is fuelling unemployment in this ward, and we are striving to improve the resident's quality of life and not exacerbate their circumstances.

The location of the proposed premises targets the poorer communities, and it becomes harder for the health inequalities gap to close. If the application is to be granted it will not align and will directly conflict with our local policies and licensing objectives to protect children and vulnerable adults.

There are three schools, one nursery and a children's centre located within 500-meter radius of the premises including: Woodlands Park Nursery and Children's Centre, Browns Bears Nursery, South Harringay Junior School, South Harringay Infant School, Saint John Vianney Roman Catholic School.

There is a concern on the proposed gambling premises near schools and the negative impacts on young children and other vulnerable individuals. Increased number of gambling shops clustered 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 people gambling harmfully are high and the increased stress and often debt for the affected others.

Between late 2019 to February 2020 children and parents focus groups were conducted as part of the [Schools Superzone Project](#). The parents commented on the large volume of gambling premises in close proximity to each other and one parent expressed concern about the influence this would have on children and their development, with concerns raised about the possibility of enabling gambling addictions in the future.

In summary, this undermines our key objective in the current borough plan “*A Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential*”. The effects of extension of the licence to 24/7 gambling premises should be seen in the wider context of the wellbeing and overall health of the society, and as such, it is essential to consider the legitimate objectives of licensing, concerns of the parents and the community’s wellbeing.

## 2. Antisocial Behaviour & Crime

Table 1. Anti-social behaviour in the Haringay Ward for the most recent period available:

Type of Incident	Number of Incidents	Rate per 1,000 Population
Anti-Social Behaviour (ASB)	664	43.0
Total Recorded Crime	1,689	12% increase from previous year 1

<sup>1</sup>The most common types of anti-social behaviour in Haringey include rowdy or inconsiderate behaviour, nuisance neighbours, noise complaints, and vehicle nuisance

There has been a 12% increase from the previous year in crime in Haringay ward. We have seen the applicants risk assessment and believe considering the evidence we are presenting that they are unable to address the following issues adequately. New research carried out by Demireva & Lo lacuna (2024)<sup>2</sup>. Demonstrates the growing evidence on the impact of gambling within a local area. Here are three key points from the journal article "Gambling outlets as agents of local area disorganisation: Crime and local institutions, the case of the UK":

1. **Association with Crime:** Gambling outlets are significantly and positively associated with various types of crime, even when controlling for other businesses and socio-economic characteristics of the area.
2. **Impact on Deprived Areas:** The negative impact of gambling outlets is more pronounced in areas with high levels of deprivation, particularly for opportunistic crimes like theft and burglary.

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<sup>1</sup> [Performance Overview](#) Antisocial Behaviour Overview

<sup>2</sup> [Gambling outlets as agents of local area disorganization: Crime and local institutions, the case of the UK - Neli Demireva, Sergio Lo lacono, 2024](#)

3. **Residential Stability:** High residential stability, measured by the proportion of homeowners, does not shield communities from the negative effects of gambling outlets. In fact, crime rates increase with higher gambling outlet density in these areas.

### 3. Local policy

The extension of the operating hours into the early hours of the morning conflicts with the following policies:

Borough Plan 2019-23 and Corporate Delivery Plan (2022/23-2023/24)

*“A Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential”.*

The Borough Plan is replaced with the new Corporate Delivery Plan (2022/23-2023-24).

The Corporate Delivery Plan includes themes with set of outcomes we are working towards as an organisation and focuses on tackling inequalities and recognises economic inequality and the need to use levers available to reduce poverty in the borough and mitigate its worst impacts.

*Theme: Children and Young People*

Outcome: Happy Childhoods - All children across the borough will be happy and healthy as they grow up, feeling safe and secure in their family networks and communities.

*Theme: Adults, Health and Welfare*

Outcome: Healthy and Fulfilling Lives - All adults can live healthy and fulfilling lives, with dignity, staying active, safe, independent and connected in their communities

Within this section we have targets for gambling harms campaign for residents and suicide prevention strategy.

Haringey Health & Wellbeing Strategy 2024-2929

*Theme: Healthy Place Shaping*

Focusing on Healthier High Streets (including tackling proliferation of gambling, hot food takeaways) and our intention to publish a Joint Strategic Needs Assessment (JSNA) on Gambling Harms in the borough. A JSNA means that there is a serious health issue that needs addressing collectively by all partner agencies – recognising that gambling harms has become a non-communicable epidemic in our borough. Our recommendation in this document includes prevention of further proliferation of gambling in areas of high deprivation and overconcentration due to the high level of vulnerability.

Local Plan SP14 Health and Well-being:

*Work with NHS Haringey in its goal to reduce health inequalities in the areas with poorest health*

Gambling related harms are adverse effects that gambling has on a person's health and wellbeing, as well as affected others (friends/families), and more widely, on communities and society. Harm affects

areas including health, relationships, employment, crime, debt and deterioration of physical and mental health. It can have a devastating impact on their quality of life, with long lasting effects.<sup>3</sup> Residents experience gambling harms by visiting these gambling premises.

The location of the proposed premises targets the poorer communities, and it becomes harder for the health inequalities gap to close. If the planning application is to be granted it will not align with our Corporate Plan to reduce health inequalities, create healthy spaces and neighbourhoods for children and give children the best start in life. It will not demonstrate our preventative efforts to support families and enhance mental wellbeing.

The “Health on the High Street” report published by The Royal Society for Public Health in 2015 provides a range of sources of evidence about the negative health impact of betting shops, payday loan shops, pawnbrokers, games arcades and fast-food takeaways. There has been a growing concern in recent years about the proliferation and over-concentration of gambling premises, pay-day loan shops, pawn brokers and amusement arcades and their impacts on mental health and the vibrancy and vitality of town centres. Extending the hours add to the activity and increases the direct and indirect financial, physical and emotional costs to the borough.

According to the Gambling Commission’s (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 extension of the licence of the gambling premises is situated within one of the most deprived areas, therefore, will not be in line with the council’s commitment to improve resident’s lives and reduce health inequalities.

### **Late-night Gambling**

Gambling late at night is recognised as being associated with harmful gambling (Gambling Commission, 2021)<sup>4</sup>

The extension of opening hours to 24 hours means those who are at greater risk of gambling harm are likely to stay up late and subsequently becoming sleep deprived leading to the individual to gamble even more. Sleep deprivation makes individuals pursue bigger risks and give less consideration to negative consequences<sup>5</sup>

The health impacts of disrupted sleep and sleep deprivation are well researched<sup>6</sup> - consideration must be given to residents as it can impact their mental health and sleep.

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<sup>3</sup> Office for Health Improvement and Disparities and Public Health England. Gambling-related harms: evidence review. <https://www.gov.uk/government/publications/gambling-related-harms-evidence-review>

<sup>4</sup> <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/advisory-board-for-safer-gambling-advice-to-the-gambling-commission-on#22>

<sup>5</sup> <https://www.rsph.org.uk/about-us/news/would-night-time-restrictions-on-online-gambling-reduce-harms.html>

<sup>6</sup>How does sleep relate to mental health? Mind (2020). Last accessed [online](#) March 2023.

### **Gambling and Vulnerable Groups**

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, effects on the brain, 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<sup>7</sup>. 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<sup>8</sup>.

### **Conclusion**

Due to the above reasons we object to the extension of hours as gambling harms is a growing problem in Haringey as children and young people, vulnerable residents, residents who are on the edge of vulnerability and residents who waver from stability to vulnerability due to the ongoing cost of living crisis, unstable employment and homes. Our high streets must be healthy and safe. The evidence demonstrates that collectively in an area of high deprivation that gambling outlets are likely to be agents of local area disorganisation which can impacts our residents directly and therefore, fails to meet the licensing objective to protect our children and vulnerable people. In any event, we would like to see the following conditions applied. We would like to see the applicant's management and staff contact our local gambling harms service, so they know how to refer vulnerable customers or encourage self-referral into support services. A staff member on duty always that has undertaken Mental Health first aid training and first aid training.

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<sup>7</sup> Guidance to licensing authorities. Gambling Commission (2021). Last accessed [online](#) March 2023.

<sup>8</sup> A 'Whole Council' Approach to Gambling. London Councils. London Councils, 2018. Last accessed [online](#) March 2023.