

## **Representation in respect of Premises License variation**

### **Adult Gaming Centre 519 Green Lanes N4 1AN - To open 24hrs/day, 7 days a week**

I am making this representation regarding the application to vary the premises license for the **Adult Gaming Centre 519 Green Lanes N4 1AN**. I am doing this in my capacity as ward councillor and wish to oppose this application. I share the concerns of both the Gardens Residents' Association and the Ladder Community Safety Partnership who have also made submissions. I am concerned that the proposed variation to the current license would have an adverse impact on those living near the premises – people in the flats above the shops along this section of Green Lanes and those living at the eastern end of adjacent Ladder roads – which if granted would mean the gaming centre would be open 24 hours a day, 7 days a week.

Such a variation could set a precedent for other gambling premises on Green Lanes to follow suit and extend their hours which, given the profile of the area, granting permission for a 24/7 gambling outlet in Green Lanes, Harringay, would be against, at minimum, two of the three key Licensing Objectives of the Gambling Act 2005:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime
- Protecting children and other vulnerable persons from being harmed, or exploited by gambling

The applicant has submitted, as required, a **Local Area Gambling Risk Assessment**, and relies on this evidence of local research, with actions to tackle gambling harms. However, this document has many errors and omissions in this document which are of key relevance.

The LCSP has detailed these and I have reproduced them here:

The profile has an **Incorrect list of gambling outlets** (pp 11-12)

- There is no William Hill in Green Lanes, the reference to 472-480 Green Lanes is a location in Palmers Green and should read West Green Road
- By contrast, two other betting shops have been omitted from the list: Jennings, 32-33 Grand Parade and Ladbrokes 10-12 Grand Parade – the latter omission is the more surprising as it is almost directly opposite the applicant!
- The list fails to record the very close proximity of four gambling outlets (507, 513, 519 Green Lanes, 10-12 Grand Parade) which has obvious implications for problem gamblers and crime (see Section 2 below)
- Golden Slots AGC is at 48 Grand Parade, not 49.

### **Incorrect list of gambling premises in tabular form (p 46)**

- This table is based on the situation before the boundary changes of May 2022, **and is therefore 2.5 years out of date.**
- In particular, changes affecting Green Lanes mean that **Harringay ward has seven gambling outlets, not three**, a significant difference which also contributes to it being an Area of Vulnerability in the Council's Gambling Policy 2022-25

**Incorrect statement that there are no homelessness centres within half a mile (p 8)**

- There are in fact three homelessness centres, one each in Burgoyne Road (wrongly identified as Mental Health Clinic p7), Duckett Road (not mentioned at all) and Mattison Road (wrongly identified as a church p5). There is also a large HMO for vulnerable people placed by other boroughs on Green Lanes – Beresford House.

It is widely accepted that homeless people are highly vulnerable to gambling harm, and it is regrettable that the applicant is unaware of the location of homelessness services in the ward,

**There are no references to Houses in Multiple Occupation (HMOs) in Harringay ward.**

This is a glaring omission. Harringay ward has almost 800 houses in multiple occupation which suggests there are many vulnerable people accommodated who could be prone to gambling harms.

- A recent study by Haringey Council reveals that Harringay ward has by far the highest number of HMOs within the borough – 785 (in August 2023) with over 2,300 occupants
- This is significant because, once again, it is widely accepted that individuals living in such accommodation are more likely to be vulnerable adults. For more detail about this see Section 3b, below

The fact that the applicant has presented a factually incorrect risk profile is of serious concern. The mitigations they propose do little to deal with the key issue of encouraging and promoting gambling in an area where there is such a high incidence of vulnerable people.

Turning to the licensing objective of **Crime and Disorder issues (Licensing Objective)**, the Local Area Profile in the Council's Gambling Policy has identified Harringay ward as an Area of Vulnerability. Within this overall context, the extension of opening hours to 24/7 is particularly unwelcome. It is well-documented that gaming centres are most frequently located in poor areas where the poorest people are most likely to gamble on the slot machines. It is worth noting that criminal damage in these venues is quite common if not always reported. I understand, as a local example, that the plate glass window at 513 Green Lanes AGC had to be replaced earlier this year. Links between acquisitive crime and addiction are extremely well known, another cause for concern since Harringay ward has an ongoing and longstanding problem with drug dealing and substance abuse.

The local SNT has made huge efforts to deal with acquisitive crime, including a campaign to reduce burglary which has been on the increase. So too, have thefts from motor vehicles – the sort of crime which provides funds for a drug or gambling addiction. As

As mentioned above, Harringay area is a well-known hot spot for drug dealing, including Class A. As a result, two of the three Met. Police Ward priorities are based around drug dealing in conjunction with other criminal activity. There is a very real concern that a 24/7 gambling outlet will exacerbate this, as has happened in similar locations e.g. near Turnpike Lane.

The LCSP has made reference to the problems experienced in Green Lanes over twenty years ago when the 24/7 economy contributed to 'an explosion of crime and disorder, culminating in murder, a drug-related turf war and an associated proliferation of late-night gambling outlets.' The Council, the police, local residents and traders all came together via the Green Lanes Strategy Group to try to make Green Lanes a better place which has been

hugely successful. It is not surprising that residents living on both sides of Green Lanes do not want any return to the 24/7 economy, underpinned by gaming and gambling.

### **Children and Vulnerable Persons Issues (Licensing Objective)**

Haringey's 'Statement of Gambling Policy 2022-25' makes it clear that when determining an application to grant a Premises License the Council will have regard to the location of services for children and the need to protect vulnerable adults. All of these factors are relevant here, as shown below.

#### **Schools and Children**

The area risk profile lists schools and nurseries near the premises, and as Green Lanes is the main shopping district in the area children will be seeing this, and other gambling facilities quite regularly. The prevalence of gambling premises in the area, where gambling is promoted and encouraged, is not a positive message to children. Late night and 24/7 opening also poses a particular risk for older teenagers (16-18 year olds) who may be tempted to enter and who will need to be very closely monitored by staff as a result.

#### **Vulnerable adults**

I have already commented on the unusually high number of vulnerable adults in the area. As well as the high incidence of HMOs, there are also extensive inpatient mental health care facilities at St Ann's Hospital, which draws in vulnerable adults from a broad area of North London.

In addition, the Gambling Local Area Profile January 2022 para 8.4 states there are approximately 4,000 adults with severe mental illnesses living in Haringey – three times more than would be expected, even given Haringey's level of deprivation. The wards adjacent to Green Lanes, for which Green Lanes is their high street, are home to a significant number of vulnerable adults living in various types of supported housing. Haringay ward alone has the highest number of hostels of all 21 wards in the borough. Given the profile of problem gamblers described in GamCare's Annual Reports - largely male, between 18-35 years old – having a 24/7 centre on Green Lanes would seem irresponsible since it is this group likely to be living in accommodation such as HMOs (see above) and identified in the latest census returns.

It is well known that poor and marginalised people are the most susceptible to problem gambling, which can explain why these centres are clustered in poorer areas. The longer the hours, the greater the inducement to gamble- whatever mitigations are proposed. Agreeing to this variation would simply legitimate this, and I would urge the committee to reject this application. I would finally remind members that the Licensing Committee refused an identical application for 24/7 opening for the AGC at 513 Green Lanes in 2021.

Thank you

Zena Brabazon

Cabinet Member for Children , Schools, and families

Councillor, Haringay ward