

**LADDER COMMUNITY SAFETY PARTNERSHIP**  
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**Premises Licence: Adult Gaming Centre 519 Green Lanes N4 1AN**  
**To open 24hrs/day, 7 days a week**

**Introduction**

I am writing to you on behalf of the local community in my capacity as elected Chair of both the Ladder Community Safety Partnership (LCSP) and the Harringay Ward Police Panel. The LCSP is an umbrella organisation containing hundreds of individual members but also representatives of Neighbourhood Watches and Residents' Associations throughout the Ward including Green Lanes. We are an independent group, although we work in partnership with many other key stakeholders to improve the quality of life for local people. The Police Panel obviously works closely with our local officers and sets priorities which aim to keep the area safe, and free from crime, antisocial behaviour and other nuisances.

Our members – and particularly those who live near the premises (in flats along Green Lanes and at the eastern end of adjacent Ladder roads) – are very concerned at the prospect of an AGC opening 24 hours a day, 7 days a week. We believe that, in the specific context of the local area, granting permission for a 24/7 gambling outlet in Green Lanes, Harringay, would be against 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

Evidence for our concerns is given in sections 2 and 3 below

However, before that we would like to note that the AGCs in Green Lanes have repeatedly tried, and failed, to secure planning permission for opening hours later than 23.00. Both LBH and the Planning Inspectorate have repeatedly refused permission, citing concerns about crime, ASB and nuisance likely to be caused. Indeed, the

Inspectorate refused a daily opening time until 2am for the adjacent AGC at 513 Green Lanes as recently as September 2024.

While we fully understand that Licensing is a separate and independent regime, it is worth stating that there is at present no realistic prospect of 24/7 opening being allowed by Planning, so this application could be seen as an attempt to put pressure on the planning process, were it to succeed.

In addition, the overall thrust of Haringey's Local Development Plan is to boost Wood Green as a night-time economy, while Green Lanes is supported as an evening economy. This means that there are currently no leisure/entertainment/restaurant/café etc facilities open 24/7 in the core area of Green Lanes. Granting such hours would therefore be a radical step and set an unfortunate precedent for many other premises especially all the other gambling outlets in Green Lanes, which would no doubt try to follow suit.

### 1. **The applicant's Local Area Gambling Risk Assessment**

We are concerned at the range and extent of the errors and omissions in this document; some of the most important include:

#### (a) **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 therefore fails to show 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

#### (b) **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 Haringay 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

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

- There are in fact three homeless 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)
- This is significant because it is widely accepted that the (recently) homeless are highly vulnerable to gambling harm

(d) **Omission of any references to Houses in Multiple Occupation (HMOs) in Harringay ward**

- 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

In conclusion, the extent and nature of all these errors and omissions leaves us very concerned about the overall reliability of the applicant's Risk Assessment document.

2. **Crime and Disorder issues (Licensing Objective)**

The Harringay Green Lanes area is located in a borough which is one of the most deprived. This is recognised by the applicants who note that the borough is the fourth most deprived in London and ranked 49/317 local authorities in England (p17). In addition, 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.

The large number of premises with gaming machines provides an obvious target for irate punters who have lost money (criminal damage cases) while professional criminals or opportunist crime target both the machines and the cash in transit. Staff and innocent bystanders are also vulnerable.

It should be remembered that many of the criminal damage cases are simply not reported. This is because betting outlets do not wish to be associated with too many such occurrences for fear that their licence may be called in for review.

It is worth noting that criminal damage to machines is very common. A typical offence is committed out of anger and frustration when a punter loses his money – offenders are almost invariably male. Shop frontages are also a target – we understand that the plate glass window at 513 Green Lanes AGC had to be replaced earlier this year. Links between crime and addiction are extremely well known and there is little doubt that some customers will be committing acquisitive crime in the local area to feed their addiction.

In this context of gambling-induced crime, it is worth noting that the Green Lanes area has for some time been the focus of a campaign to reduce burglary. There has also been a concerted – and ongoing – effort by the Harringay SNT police to improve security at vulnerable domestic properties throughout the Ladder roads in order to reduce the likelihood of burglary.

There has also been an increase this year in numbers of thefts from a motor vehicle – the sort of crime which provides funds for a drug or gambling addiction

The Harringay area is already a well-know 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 act as a magnet for criminal activity, especially as this is already the case in similar locations eg near Turnpike Lane.

Finally, it is worth remembering that Green Lanes used to have a 24/7 economy. It led (in 2002) to an explosion of crime and disorder, culminating in murder, a drug-related turf war and an associated proliferation of late night gambling outlets. As a result, 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. We are therefore really anxious that we should not turn the clock back by allowing a 24/7 economy to re-emerge. We have seen the consequences and do not want to experience them ever again.

### **3. 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 Licence 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.

#### **(a) Schools and Children**

The site of the proposed betting shop is between North and South Harringay schools (Falkland and Mattison Roads respectively). There are also many other facilities for children nearby, for example in Cavendish Road and Woodlands Park Road. Four more nurseries and primary schools are also listed by the applicants (p3). As they are local schools, most of the children will live in Harringay and St Ann's wards, in the residential streets of the Ladder and the Gardens. In addition, of course, there are many other children between the ages of 11 and 18 who live in the area.

Local parents have told the LCSP that they do not want their children to be over-exposed to ever-increasing numbers of gambling premises on their way to and from school, or to the shops in Green Lanes. Gambling premises, passed several times every day, mentally creates an impression that gambling is somehow only to be expected as a dominant presence in daily life. This is not the sort of environment in which parents should be forced to bring up their 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.

#### **(b) Vulnerable adults**

There is an unusually high number of vulnerable adults in the area. There are three main reasons for these high numbers:

- (i) The extensive mental health care facilities at St Ann's Hospital, which draws in vulnerable adults from a broad area of North London. Moreover, 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 (Gambling Local Area Profile January 2022 para 8.4)

- (ii) An exceptional number of vulnerable adults living in ‘care in the community’ in the two wards adjacent to Green Lanes. Harringay ward in particular has one of the highest numbers of hostels of all 21 wards in the borough
- (iii) There is also an unusually high number of vulnerable adults in the area because of the huge number of HMOs (Houses in Multiple Occupation). Harringay ward has the largest number of any ward in the Borough. For example, under the Council’s Selective Licensing Scheme this core area of Green Lanes is a hotspot as identified by the Lower Super Output Areas. This means that it has disproportionately high numbers of HMO/private sector dwellings and is problematic in terms of poor housing, environmental crime, ASB, and crime reported to the police.

Too often, family houses have fallen victim to excessive sub-division into large numbers of small units, which are frequently found to be homes of young single men – many of them vulnerable adults: recent migrants, asylum seekers, refugees, those who lack the means to live anywhere else. Such adults may be all too willing to take a gamble, believing that they have nothing to lose. Academic studies in several countries, including Australia, Sweden and the United States, have shown the rate of problem gambling to be several times higher among minority or immigrant groups than the rest of the population.

### **(c) Vulnerable Adults and Problem Gambling**

The lives of vulnerable adults are clearly harmed by addiction. Slot machines are recognised as highly addictive and this application, if successful, will simply increase the opportunity to feed that addiction by offering a gambling facility at very late hours when no such venue is currently open anywhere else in Green Lanes.

### **Evidence for Problem Gambling**

GamCare (funded by the gaming industry) is the leading agency offering help and support to problem gamblers. Their Annual Reports reveal the steadily increasing numbers of people seeking help each year. The Gambling Commission estimates that there are a quarter of a million problem gamblers in Britain, but Gamblers Anonymous thinks it is well over half a million. Either way it is certainly a significant and growing problem.

GamCare’s Annual Reports reveal that their callers seeking help were largely male, and that the key age-group was 18-35 years old – the very group which are above-average in numbers in the two wards either side of Green Lanes, often single, living in accommodation such as HMOs (see above). This is based on latest census returns which, it is recognised, are an underestimate in this case, because many such vulnerable adults simply do not fill in their returns.

### **Problems of increased availability for vulnerable adults**

We are seriously concerned that an outlet with longer hours in Green Lanes will simply provide more temptation, through increased availability, for the very large number of vulnerable local adults in the area. There is plenty of academic research which supports this stance, ie that increased availability leads to more gambling and more problem gambling for the vulnerable.

One study (supported by GamCare 'Gamblers and Debt Pathfinder Study 2009') noted how '*the more marginalised and deprived are often the most susceptible*' (to problem gambling and debt). We need to wonder who would wish to gamble in the early hours of the morning, at 3am or 4am. It is surely the case that a problem gambler or vulnerable adult would be the most likely customer.

### **Conclusion**

In the light of this evidence, the conclusion must be that a gambling outlet in Green Lanes offering access to slot machines 24/7 will have a seriously adverse impact on two of the key licensing objectives.

The increased risk of crime, whether violent or acquisitive, could obviously affect literally anyone; children will be at an increased risk of exposure to more gambling; while the large number of vulnerable adults are far more likely to gamble (or worse still, fall victim to addiction) given a hugely increased time frame of 24/7.

We therefore urge the Council, as the Licensing Authority, to limit the trading of the AGC to the existing hours of 9am – 11pm daily. This would be the same as the nearby AGCs at 513 Green Lanes and 48 Grand Parade, and in line with all of the existing betting shops.

Finally, we note that the Licensing Committee refused an identical application for 24/7 opening for the AGC at 513 Green Lanes in 2021. As the issues and problems around crime, gambling addiction and vulnerable adults and children have only increased since then, we can see no reason why 24/7 opening should be granted for the current application.

Ian Sygrave

Chair, on behalf of the LCSP

Chair, on behalf of the Harringay Police Panel