

Public Health Objection to Licensing Application

17 High Road, Wood Green, London, N22 6BH

Health in All Policies Team, Public Health

7th April 2025

Summary

This objection to the above licensing application is made on behalf of the Public Health Team for a variation of an Adult Gaming Centre at 17 High Road, Wood Green.

The grounds for objection are its location close to vulnerable areas and concentration of use in an area where the risk of gambling related harm is high.

Vulnerability has increased since the COVID 19 Pandemic and the cost-of-living crisis, which has had a negative impact on employment, residents' income, increasing poverty and debt; this is further compounded by mental health, unemployment, and families under pressure. This has had a direct impact on the residents of Noel Park Ward.

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

1. The prevention of crime and disorder
2. Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The applicant has not provided a sufficient local area risk assessment and mitigation plans. 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 consider the legitimate objectives of licensing. This undermines our preventative efforts to reduce gambling-related harms in the community. It is, therefore, strongly recommended that the Licensing Committee refuse this application.

Comments on the Local Area Risk Assessment (LARA)

The local area risk assessment submitted by the applicant does not provide an accurate assessment of Wood Green. The applicant has not assessed the area within a 400-meter radius, instead limiting the assessment to 300 meters, which does not give a full picture of the surrounding area. We have addressed the same concern in their licensing application on 31st August 2023.

Furthermore, the mitigation plans to support their local area risk assessment is not adequate and the applicant has missed opportunity to demonstrate mitigations of potential risks to the public.

We have noted the purpose of the document places undue focus on staff responsibilities rather than the operator's obligation to conduct a comprehensive local risk assessment. While staff awareness is important, the primary focus of LARA should be on how the organisation identifies and mitigates risks in the surrounding area. The applicant needs to consider the points below. This should be submitted to the licensing committee as some of the points below have been repeated in our response on 31st August 2023.

1. The operator needs to provide the distances between LBO and Little Vegas (Page 5).
2. There is no mention of Rising Green Youth hub or Youth Justice Service in Wood Green (Page 10).
3. Mitigation Plan within their local area risk assessment.
 - a. Poor security increases vulnerability to crime. This should be noted down as a moderate risk. (Severe to business, Moderate severe to community and Moderate severe to individuals). Mitigations are in place only to prevent the organisation harm, but there is no mention about customers and those living/working in the area. (Page 14).
 - b. There is no mention of alerts on machines, breaks and maximum amount of money per session. Staff training should be more specific – is it gambling harm training? Actions when identifying a vulnerable person should also be specified? How is the company mitigating to prevent gambling related harms– is there a policy in place? (Page 17-18).
 - c. Failure to recognise signs associated with gambling related harms – similar to point above. Need to specify on type of training, potentially add a maximum amount you can withdraw from ATM, maximum amount an individual can spend in a session, mandatory breaks, gambling harm training (Page 18).
4. The assessment does not specify the schools that are located with 400meter radius.
5. It should also be noted there are a number of supported living housing/temporary accommodations located near the proposed premises that has not been listed.
6. We noted on page 10, the application mentioned "It is not unusual to see college and school children in High Road and the Mall shopping centre after school hours and using the nearby bus/train links". Because of this reason we need to protect children and vulnerable adults under the licensing objectives.
7. We would like to know from the applicant the number of toilets and whether this is separate from the staff toilet.

8. We would like the applicant to include mental health and first aid training for staff, in their local area risk assessment.

Location

The Public Health team has evaluated the area of which the premises is located. This proposal is at a vulnerable location with three 24-hour adult gaming centres (AGCs) all within a 1-minute walk. There are a further nine gambling premises including another 24-hour AGC on the High Road. The over-concentration of gambling premises has a negative impact on the health and wellbeing of our residents. Furthermore, Noel Park ward is ranked high in all risks associated with gambling-related harm (e.g. poverty, unemployment, mental health) and the vulnerable groups highlighted in this report suggests a strong need to safeguard the area from over-concentration of gambling premises and to help promote a healthy high street and retain a vibrant mix of uses in the town centre.

Three AGCs clustered on Wood Green High Road:

- **Admiral Casino: Wood Green**, 117 High Road, Wood Green, London, N22 6BB (1 min walk) – open 24 hours
- **Admiral Casino: Turnpike Lane**, 9 High Road, Wood Green, London, N22 6BH (1 min walk) – open 24 hours
- **Game Nation**, 49 High Road, Wood Green, London, N22 6BH (1 min walk) – open 24 hours

There are nine other gambling premises between Wood Green Underground station and Turnpike Lane Underground station:

- **Ladbrokes**, 742 Lordship Lane N22 5JP
- **Paddy Power**, 3a Hollywood Green, High Road N22 6EJ
- **Ladbrokes**, 12 The Broadway, High Road, N22 6DS
- **William Hill**, 9 The Broadway, High Road N22 6DS
- **Merkur Cashino**, 91 High Road, Wood Green, London, N22 6BB – AGC open 24 hours
- **Betfred**, 64 High Road, Wood Green, London, N22 6DH
- **Paddy Power**, 33 High Road N22 6BH
- **Ladbrokes**, 13 High Road N22 6BH

- **Betfred**, 679a Green Lanes, N22 0QY

Figure 1 highlights a high number of gambling premises from Wood Green High Road to West Green Road. The extension of the operating hours would detract from the diversity of uses on the high road. This does not benefit the licensing objectives, protecting children and other vulnerable persons from being harmed or exploited by gambling.



Figure 1. Map of gambling premises from the High Road to Green Lanes.

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. This does not account for others receiving treatment in gambling support services and the voluntary sector, however, highlights there is a gambling addiction issue in Haringey.

Estimated fiscal cost of gambling harm to Haring

In April 2023, the National Institute of Economic and Social Research (NIESR) estimated that the annual fiscal cost of 'problem gambling' (PGSI 8+) is roughly £1.4 billion (in 2023 prices)

In Haringey the annual fiscal costs of gambling harm is £7.9m 2023-24 (Based on research by GambleAware/YouGov and the National Institute of Economic and Social Research.). This includes costs to social care, NHS, homelessness, unemployment, and the criminal justice system and does not account for losses to the individual or family.

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The table below shows the excess cost of harm associated with gambling across Hornsey and Wood Green and GB. and GB. NIESR's national figures have been apportioned to Hornsey and Wood Green based on the Parliamentary Constituency's estimated share of the total number of people in Great Britain who are PGSI 8+.

Using this methodology, the total fiscal cost of harm associated with 'problem gambling' in Hornsey and Wood Green is estimated to be £2,232,954.

Table 1. The cost of harm associated with gambling in Hornsey and Wood Green (2023), where Little Vegas is located.

Cost of harm associated with gambling	Hornsey and Wood Green	Great Britain
Health: General Medical Service Consultation (mental health)	£36,371	£21,600,000
Health: Hospital Inpatient	£752,176	£446,700,000
Crime: Crime Committed (police call out)	£53,883	£32,000,000
Crime: Court Appearance	£15,155	£9,000,000
Housing: Homelessness Support	£27,784	£16,500,000
Welfare: Universal Credit	£1,347,585	£800,300,000
Fiscal cost (£ millions)	£2,232,954	£1,400,000,000

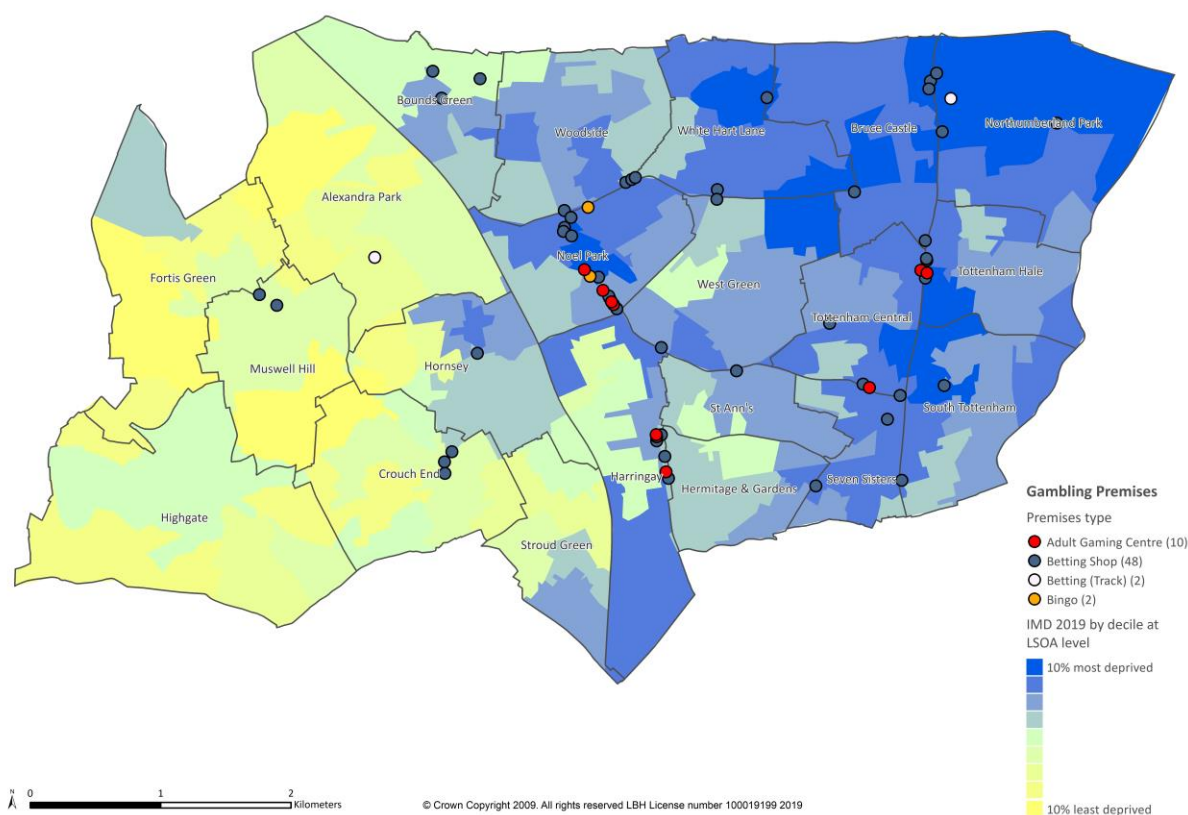


Figure 2. Map of the location of gambling premises in Haringey, 2023.

From Figure 2 you can see Haringey has a number of gambling establishment in the borough (2023). Gambling is a pressing health inequalities issue. More deprived wards have higher number of gambling premises and this is linked to deprivation levels.

The Noel Park ward area is one of the most deprived areas in London, data from the Census 2021 shows that 60.7% of households are experiencing at least one dimension of deprivation in Noel Park². The Public Health team believe the proposal of another 24-hour

adult gaming centre will make matters worse for the residents in terms of health and wellbeing. The most disadvantaged groups have the lowest gambling participation rates, but the highest levels of harmful gambling and they are also the most susceptible to harm, which is likely to make existing health inequalities worse (PHE, Gambling-Related Harms Review 2021).

The Noel Park Ward ranks high in all risk factors associated with gambling-related harm in individuals, as listed below:

- High deprivation indices
- Increased number of residents on Universal Credit
- High numbers of people who are rough sleeping
- High percentage of residents from a minority ethnic background
- Families from very low median household income
- High unemployment rates
- High level of long-term health conditions and disability (which may include mental health issues).

An analysis of the number of gambling premises in Haringey illustrates there are 2.8 gambling premises per 10,000 of the population (Table 1) which is much higher than the national average of 1.6 per 10,000³. At a ward level, it shows Noel Park Ward has the highest number of gambling premises than the rest of the wards, with nearly 14 premises per 10,000 of the population.

Table 2. Gambling premises per 10,000 of population in Haringey (2023).

Ward	Ward population	Number of gambling premises	Premises per 10,000
Alexandra Park	9,632	1	1.04
Bounds Green	8,605	3	3.49
Bruce Castle	12,653	4	3.16
Crouch End	11,333	3	2.65
Fortis Green	12,342	0	0.00
Harringay	14,299	7	4.90
Hermitage & Gardens	12,214	0	0.00
Highgate	7,130	0	0.00
Hornsey	15,527	1	0.64
Muswell Hill	8,257	2	2.42
Noel Park	14,906	15	10.06
Northumberland Park	16,843	4	2.37

St Ann's	12,256	1	0.82
Seven Sisters	8,185	2	2.44
South Tottenham	18,690	2	1.07
Stroud Green	10,935	0	0.00
Tottenham Central	15,934	5	3.14
Tottenham Hale	11,962	4	3.34
West Green	13,242	2	1.51
White Hart Lane	13,160	2	1.52
Woodside	18,253	4	2.19

Figure 3 demonstrates the negative impact gambling can have on high streets in Haringey.

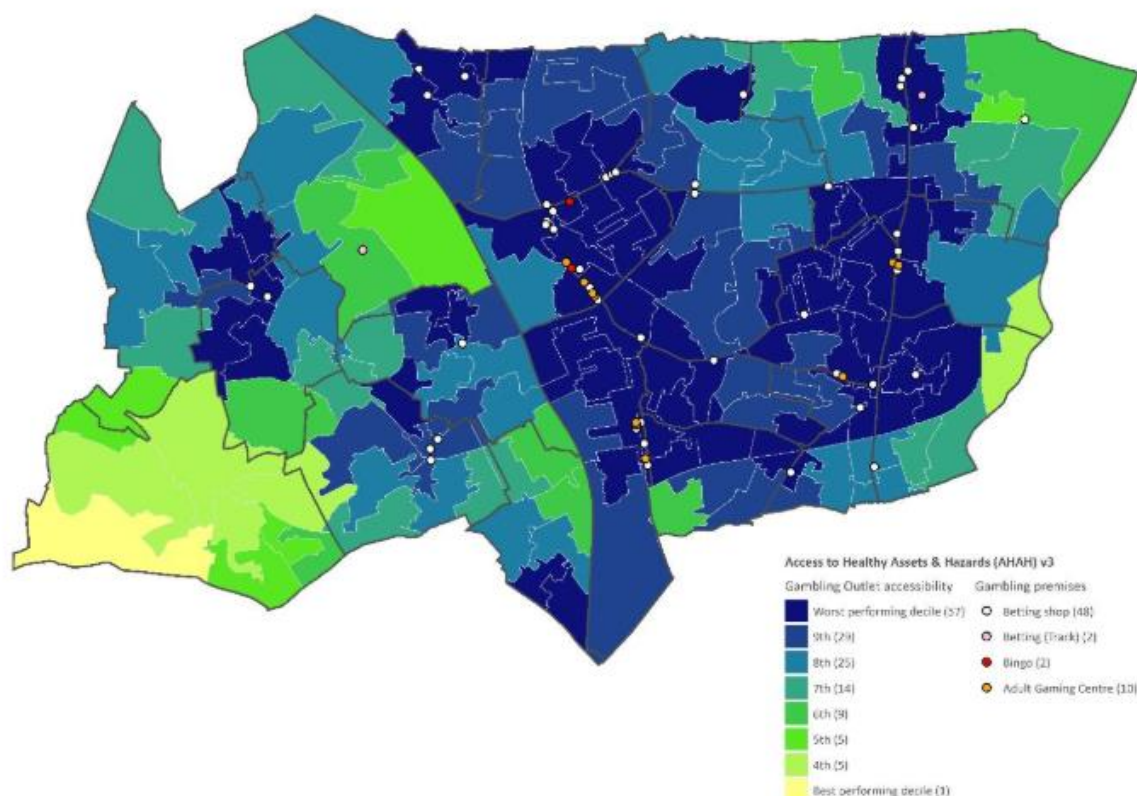


Figure 3. Map of Access to Health Assets and Hazards focus on gambling outlet accessibility in Haringey, 2022.

This map is sourced from the Consumer Data Research Centre. They have developed the AHAH (the index of 'Access to Health Assets and Hazards'). It's a multi-dimensional index for Great Britain measuring how 'healthy' neighbourhoods are. One of the metrics used in the index is the 'Distance to nearest Gambling Outlet (minutes)' which is what has been mapped here.

It shows that 83.9% (52 of the 62) of gambling premises in Haringey are located within the worst performing decile in Great Britain i.e., are among the 10% of LSOAs with the shortest distance to a gambling outlet. Furthermore, comparatively, the worst performing decile for gambling outlets only make-up 39.3% (57 LSOAs) of Haringey's LSOAs. Therefore, increasing the number or extending the hours of any of gambling premises in the worst performing areas of our borough undermines Haringey Council's efforts in creating a vibrant and healthy high street.

Problem 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, 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 harm⁴. 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 deprivation⁵.

The table below shows the proportion of people in key demographic groups with relatively high levels of 'Problem gambling' (i.e. a PGSI Score of 8+). The table compares the breakdown of these groups across Hornsey and Wood Green compared with England as a whole.

- Younger people have a higher prevalence of 'problem gambling' (PGSI 8+): with a rate of 6.8% among those aged 18-34, compared with 3.0% across all age groups. Hornsey and Wood Green has a higher proportion of people aged 18-34 (23.1%) compared with the England average (21.8%).
- People from Black, Asian and other minority ethnic groups are more likely to be PGSI 8+ (8.4%, compared with 2.2% for those of White ethnicity). Hornsey and Wood

Green have a higher proportion of people from Black, Asian and other minority ethnic groups (32.6%) compared with the England average (19.0%).

- People who are unemployed or economically inactive are more likely to be PGSI 8+ (4.1% - compared with an overall average of 3.0% across England). Hornsey and Wood Green have a higher proportion of people unemployed or economically inactive (22.3%) compared with the England average (20.5%).
- Full-time students also show a relatively high prevalence of 'problem gambling' (this is likely to be linked to the higher prevalence among young adults observed above). 6.8% of full-time students are PGSI 8+, compared with an average of 3.0% of all adults across England. Hornsey and Wood Green have a similar proportion of full-time students (2.2%) compared with the England average (2.3%).
- People not in a relationship are more likely to be PGSI 8+ (3.9%, compared with 2.2% for those in a relationship). Hornsey and Wood Green has a higher proportion of people who are not in a relationship (63.5%) compared with the England average (55.3%).

Table 3. Demographic groups with relatively high levels of 'problem gambling' and the proportion of those living in Hornsey and Wood Green constituency.

Demographic groups with relatively high levels of 'problem gambling' (PGSI score 8+)	PGSI 8+ (%)	England (%)	Hornsey and Wood Green (%)
Aged 18-34	6.8%	21.8%	23.1%
Black, Asian and other minority ethnic	8.4%	19.0%	32.6%
Unemployed/ Inactive	4.1%	20.5%	22.3%
Full time student	6.8%	2.3%	2.2%
Not in a relationship	3.9%	55.3%	63.5%
England average	3.0%		

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

People Rough Sleeping

Haringey has also seen an increase in the number of people who are rough sleeping with a range of overlapping and multiple disadvantages, such as addiction, poor physical and mental health, contact with institutions as children or adults and offending histories and experiences of trauma.

Gambling problems are more prevalent in the population facing homelessness than the general population, 11.4% of the homeless population is found to have problem gambling. 61.5% of participants with some level of gambling risk had problems before homelessness, 15.4% reported experiencing problems after homelessness⁶.

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 2012⁷).

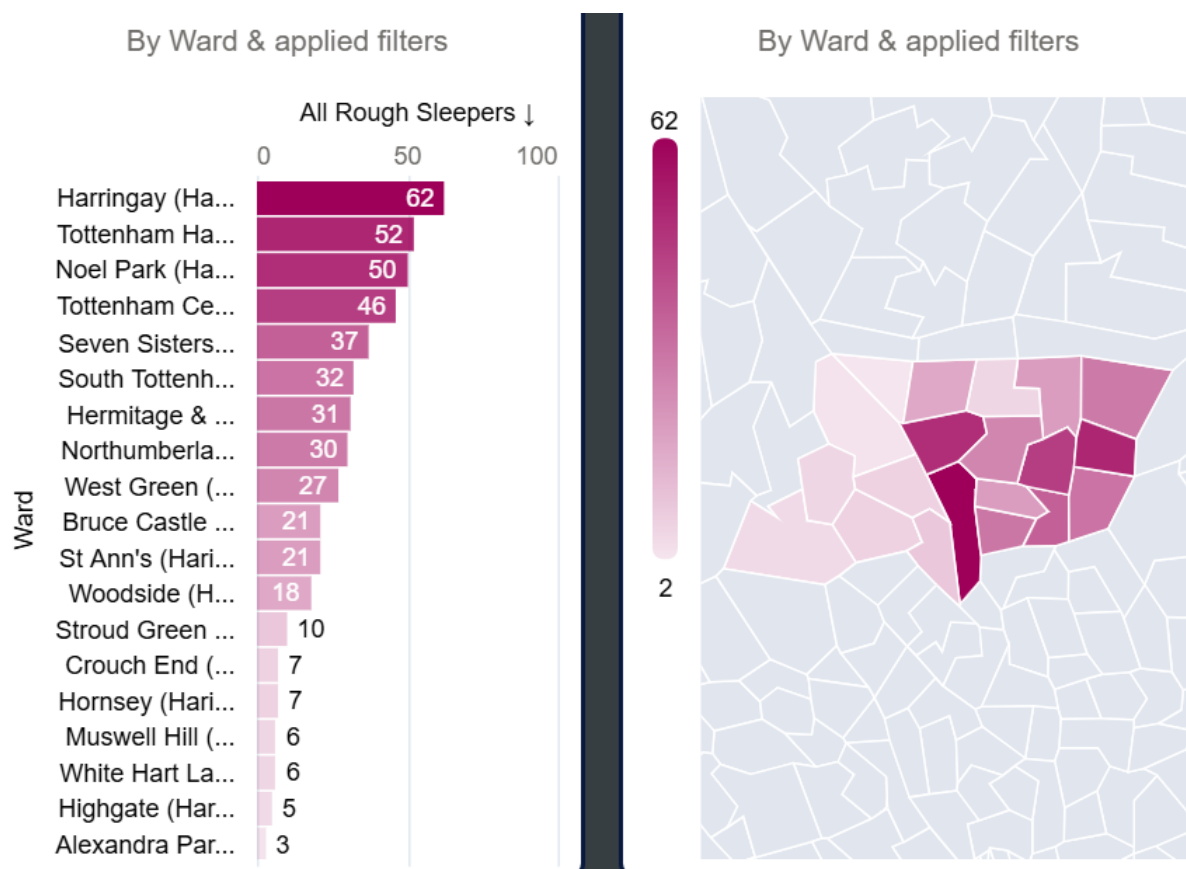


Figure 4. The number of people seen rough sleeping by outreach teams in Haringey since June 2022, (CHAIN, 2025).

Figure 4 shows the number of people seen rough sleeping by outreach teams. The map highlights Noel Park to be one of the wards with the greater concentration of those rough sleeping. However, this is only the number of people outreach teams have been able to contact, it is likely the figure is much higher.

Substance misuse

There is frequently a link with alcohol or drugs as a way of coping with anxiety or depression caused by gambling problems.⁸ Availability of opportunities to gamble and the incidence of harmful gambling within a community are known to be linked. As a result, the proposed use of the premise will attract a high level of residents who are highly dependent on alcohol and drugs.

Unemployment or Low-Income Groups

During the COVID 19 pandemic, 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. Tottenham Hale and Noel Park wards were particularly badly hit, relative

to the working age population of those wards. This had become worse during COVID 19 pandemic.

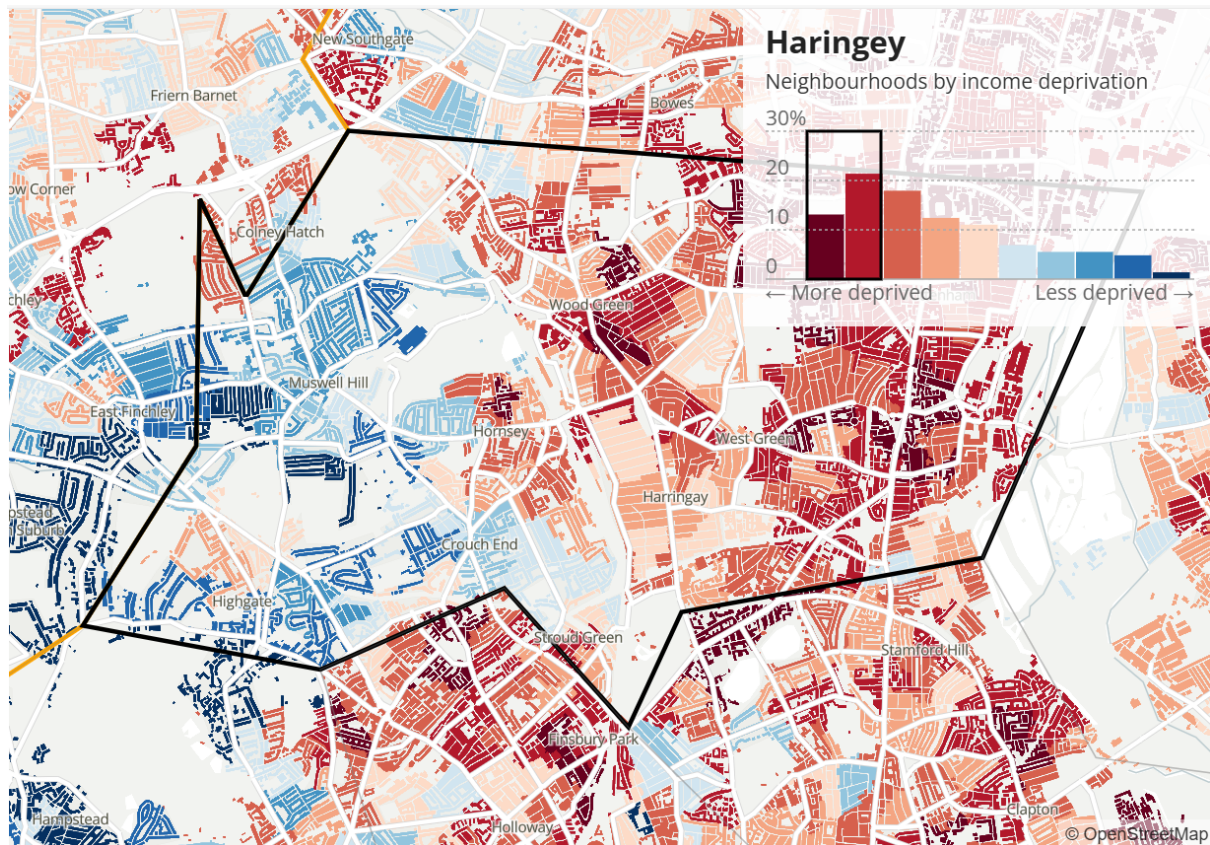


Figure 6. Income deprivation in Haringey (ONS, 2021).

Noel Park ward is among the 20% most-income deprived in England. This is shown in the first two bars in the chart and Noel Park has been highlighted as the most deprived on the map.

Problem Gambling and Location of Gambling Premises

A study carried out in Brent suggests that the growth of gambling establishments, such as AGCs and betting shops, is particularly prominent in areas with high levels of social and economic deprivation.

Protecting children and other vulnerable persons from being harmed or exploited by gambling

There are one infant school and four primary schools located within half a mile of the premises (ten-minute walk).

Primary Schools

- Noel Park Primary School (0.305 miles)
- North Haringay Primary School (0.347 miles)
- Belmont Infant School (0.435 miles)
- Belmont Junior School (0.435 miles)
- St John Vianney Catholic Primary School (0.486 miles)

Wood Green has good extensive transport links such as bus stops (Coleraine Road and Turnpike Lane) and tube stations (Wood Green and Turnpike Lane), which is used by young people and other vulnerable people. We are seeing an increase in gambling premises 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.

As part of the [School Superzone project](#) the Public Health team conducted focus groups with children and parents between late 2019 and February 2020. During the focus groups parents commented on the large volume of gambling shops 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.

For every person that experiences gambling harms, between six to ten people are negatively affected. This includes children, parents, wider family members, friends, neighbours and

work colleagues ¹ . These gambling related harms include child poverty, homelessness, domestic violence, suicide, mental health and debt².

In late 2022, the Public Health team conducted a series of focus groups to help shape our Gambling Harms Reduction Programme. The team heard accounts on the effects of gambling from residents who cited Wood Green and Tottenham High Road as the specific areas of concern. As a result, we have developed support and treatment pathways and clinics. One of the clinics is situated in Wood Green has been seeing residents face-to-face. The extension of hours will be undermining the programme of work we have developed to combat harmful gambling. The participating residents engaged in the focus groups did not believe the gambling premises improved the high street and expressed very strongly how disappointed they were to see the number of gambling premises on the high street increasing.

Safety - Residents Survey and focus groups

Neighbourhood safety after dark has declined significantly, particularly in Wood Green.

44% of Residents of Noel Park are most likely to say they feel unsafe after dark (Haringey Resident Survey, 2021).

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Low Income Family Tracker (LIFT) data

The LIFT data tracks families on low income in the borough claiming housing benefit and/or council tax reduction. The data is based on 32,000 households across the Borough.

The table below shows the number of vulnerable residents of Noel Park ward.

Table 4.

	Number of residents within Noel Park Ward
In cash short fall	357
Unemployed	1522
Unemployed (Low barriers to work)	488
Unemployed under 25	22
Food Poverty	366

¹ Citizen Advice, 2018)

² Public Health England, 2021

Fuel Poverty	911
Relative Poverty	719
NEET	161
children in relative poverty	757 (higher than the Haringey and London average).
% claiming universal credits	19.7%

Homeless households in Temporary Accommodation

Figure 5 shows a cluster of homeless households in temporary accommodation. There are a cluster of temporary accommodation in Noel Park, where the premises is located. This highlights the financial vulnerability within the area.

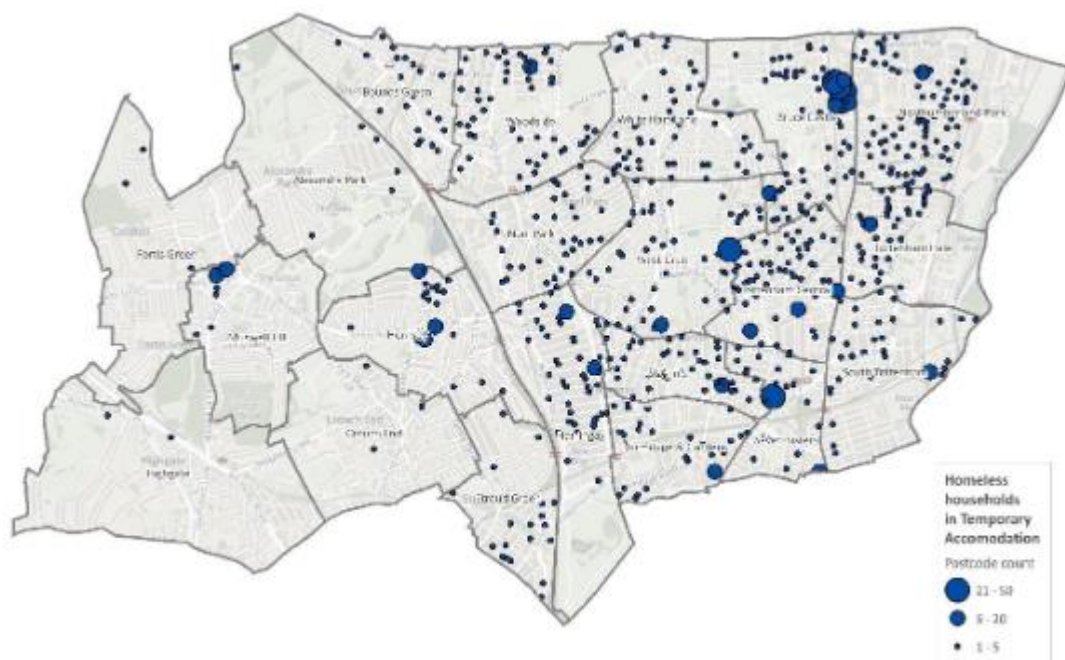


Figure 8. Map of Homeless Households in Temporary accommodation

Crime

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

Much of the focus on gambling-related crime tends to be upon people experiencing gambling harms. Criminal behaviour is most associated with harmful gambling as person gambling harmfully will 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 problems⁸.

Haringey's crime rate is 122.7 per 1,000 population, compared to 109.2 for London. This is 12% above the London average. Noel Park is the 19th highest volume crime ward in London, of the 669 total wards⁹.

The premises is located within the Noel Park ward which is ranked the highest in crime rate. The most common form of crime is theft, as shown in figure 6.

The most common offences committed by problem gamblers are income-producing crimes such as theft, fraud or drug dealing to pay off their gambling debt or gather funds to continue to gamble (GamCare, 2019).

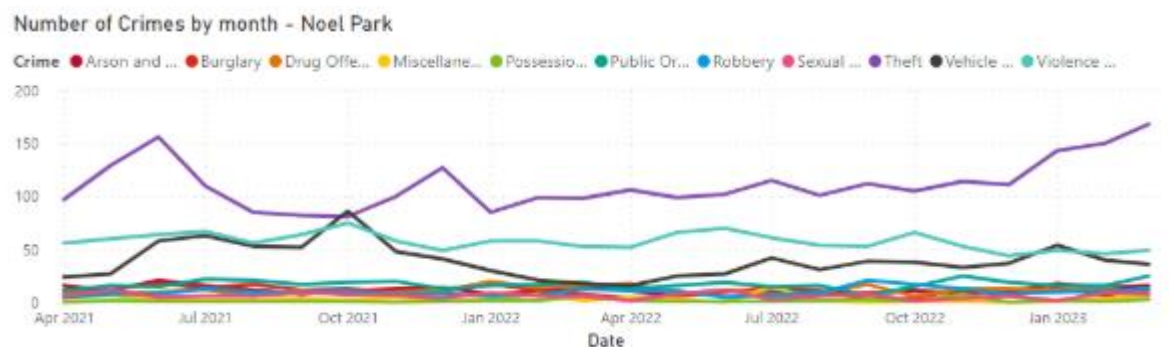


Figure 6. Number of Crimes by month (Haringey Ward Profiles, 2023)

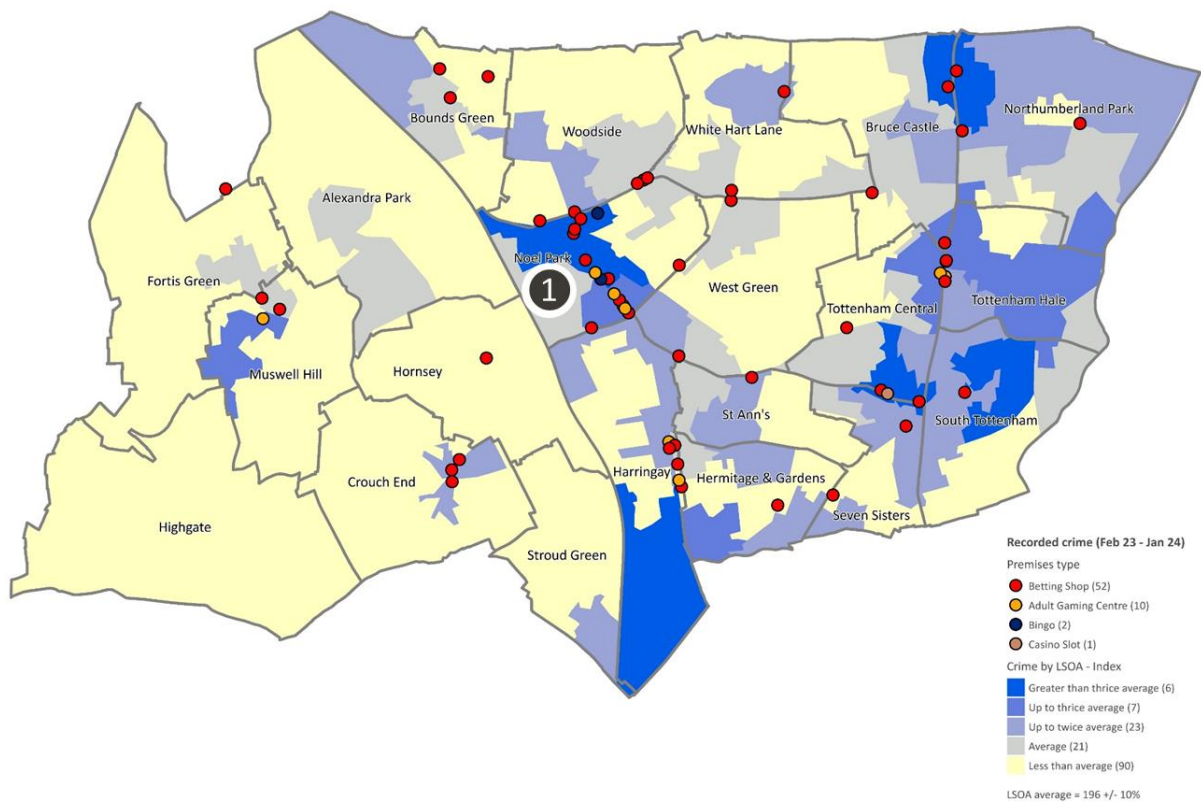


Figure 9 shows Haringey split into lower layer super output areas (LSOAs)* and by recorded crimes in the borough. The blue colours represent higher crime levels (see key). Gambling premises are shown as well.

Figure 9 highlights the high concentration of recorded crime in Noel Park Ward, particularly the wood green high street, where the premises is located.

Linking with the Corporate Plan Priorities

The council is taking action to improve public health and deliver better outcomes for residents to address the gap in life expectancy between the East and West of the borough”.

The location of the proposed premises targets the poorer communities, and it becomes harder for the health inequalities gap to close. If the licensing application is to be granted it will not align with the The Corporate Delivery Plan (<https://www.haringey.gov.uk/council-elections/council-policies-plans/corporate-delivery-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.

Conclusion

Given the evidence presented by the Public Health team, we do not believe the applicant can sufficiently mitigate the associated harms, due to the nature of their business and the already oversaturated number of gambling premises in the Wood Green area. The Local Area Risk Assessment does not adequately address the potential risks. Extending the operating hours of the AGC is likely to have a detrimental impact on the health and wellbeing of Haringey residents.

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

1. The applicant must not exceed the approved planning operating hours made on 19/07/2023 - The use hereby permitted shall not be operated before 08:00 hours or after 02:00 hours Monday to Sunday and Bank Holidays. This permission is given to facilitate the beneficial use of the premises whilst ensuring that the amenities of adjacent residential properties are not diminished consistent with Policy DM1 of The Development Management DPD 2017. Planning report can be found here: (https://publicregister.haringey.gov.uk/pr/s/planning-application/a0i8d000005TxBIAA0/hgy20231953?c_r=Arcus_BE_Public_Register&tabset-3892f=3)
2. 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.
3. There should be no illumination of the signage on the shop frontage. The applicant must consider public health comments and update their Local Area Risk Assessment
4. The applicant shall take reasonable steps to prevent nuisance directly outside the premises.
5. No alcohol shall be permitted to be consumed on the premises at any time during which facilities for gambling are being provided on the premises.
6. There must be advertising of our local Gambling Harms services on leaflet and as part of staff gambling harms training and all new staff need to be aware of local and national services and actively support the referral of those at risk or showing signs of gambling harms and include it in their risk assessment. They should keep a log of referrals for inspection by the local authority inspectors or the police.