

WITNESS STATEMENT

(CJ Act 1967, s. 9, MC Act 1980, s.s.5A (3a) and 5B MC Rules 1981, r70)

Statement of: Darrell John
Butterworth

Occupation: Licensing and Security
Compliance Manager

Age if under 18: Over 18

(if over 18 insert "over 18")

This statement (consisting of 22 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Dated the 8th April 2025

Signature: D J Butterworth

1. My name is Darrell John Butterworth and I currently operate as a self-employed Licensing and Security Authority Compliance Consultant. I have conducted this business since creating a company, Edmund Locard Licensing and Security Solutions, on the 1st January 2011. I make this statement in relation to my previous and current experiences as they relate to an application to increase the operating hours at Little Vegas Wood Green High Road.

Experience

2. Prior to taking up this role with Edmund Locard Ltd I completed 30 years service with the Greater Manchester Police in a variety of uniform and non-uniformed roles. The longest period of attachment to a department was between 1998 and 2006 when I performed the role of Force Licensing Inspector. This role involved the supervision of 12 divisional licensing officers, tasking and management of a covert licensing unit comprising a sergeant and six constables, developing force policy and enforcement in relation to all licensed units and employment and briefing of a licensing solicitor to act on behalf of the force in more complex licensing hearings.
3. During the period as the Force Licensing Inspector I was responsible for the good conduct and compliance of premises operating under a variety of licences, including outlets involved in selling alcohol, but also those that provided gambling, betting and bingo facilities. I have represented Greater

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Manchester Police at Magistrates Court hearings, Crown Court Appeals, The High Court, The Court of Appeal and Council Licensing Committee hearings, to oppose unsuitable applications and to take enforcement action against those premises whose standards had fallen below an acceptable level.

4. Throughout my period in the central licensing role Assistant Chief Constable Robert Taylor, also from the Greater Manchester Police, was the Association of Chief Police officers (ACPO) lead spokesman on Alcohol and Licensing matters. As a result of this connection I became secretariat to the ACPO National Licensing officers' group and National Licensing Forum (NLF).
5. During my time in charge of the Licensing Unit I worked very closely with David Thornton, the local Gambling Commission Inspector, conducting joint operations on both legal and illegal gaming establishments.
6. In 2006 on leaving the Central Licensing Unit I received a Chief Officers Commendation, recognising the contribution I had made to licensing enforcement across Greater Manchester, particularly in relation to my leadership and commitment shown in developing force policy and training in response to the Licensing Act 2003 and Gambling Act 2005.
7. Between 2006 and my retirement from the Greater Manchester Police in December 2010 I took up the role of Neighbourhood Inspector for the town of Heywood on the Rochdale division. This involved the supervision of over 50 police officers, community support officers and civilian support staff. Within my role as a Neighbourhood Policing Team Inspector I was required to conduct analysis of crime and incident trends to ensure that resources and tactics were deployed appropriately. The outcome of this analysis ensured that resources were deployed in the right numbers, in the right areas at the right time. On a monthly basis I also presented these statistics to the town's multi agency tasking group to ensure all agencies had the relevant information on crime trends.
8. I have continued my professional development regarding licensing knowledge by taking and passing the National Licensees Certificate and National Door Supervisors course. This enabled me to successfully apply for a Personal Licence and become approved by the Security Industry Authority (SIA) as a front line operative. In September 2011 I successfully applied to become a nominated tutor with the BII enabling me to carry out training in the award for responsible alcohol retailing and award for personal licence holders. In October 2018 I attended a training course on Licensing Hearings and Appeals and in November 2019 I attended a seminar for Licensing Consultants.

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9. Between 2013 and the present date I have conducted investigations nationally on behalf of operators. I estimate that I have visited in excess of 1000 venues licensed under the Gambling Act 2005. A complete list of the dates and areas visited is attached to this report (Exhibit reference letter DJB 1 refers). I have also conducted observations nationally in relation to premises licensed under the Alcohol Licensing Act 2003, outlets often in areas close to gambling establishments and often the source of alcohol related crime and disorder. These visits often concluded in the early hours of the morning, a period when Betting Offices are closed, but 24-hour Adult Gaming Centres continue to operate.
10. In addition to acting on behalf of operators I have also conducted observations on behalf of residents, and in September 2017 I conducted 2 days of investigations on behalf of the London Borough of Camden. In August 2021 I conducted independent observations on behalf of the Home Office in relation to asylum seekers and their impact on Crime and Disorder in the West Midland area.
11. I have previously visited the Wood Green area in relation to Gambling Applications and provided a written statement in the original application for the Little Vegas venue.
12. I have conducted investigations in many City centre locations where Gambling premises are located as well as in town centre and suburban high street locations. In all of these different types of locations, I did not observe anything that altered my previously held views, formed during my police service as outlined below, nor did I witness any of the current gambling premises contributing to social, criminal or disorderly issues.
13. It is important to stress that when conducting my observations, I act totally independently of those instructing me and record accurately what I observe. To ensure that my visits accurately reflect the true situation I always insist that local operators are not made aware of my visits taking place. I am informed by those instructing me that this was the case for the current investigation.

Overview

14. I have been requested by Chongie Entertainments Ltd. to formalise an overview of my experience in relation to how Gambling Act applications have developed under the Gambling Act 1968 and Gambling Act 2005 legislation.
15. Although the Gambling Act and Planning applications are two entirely different processes, in my experience, many of the crime, disorder, noise and anti-social behaviour concerns raised in representations are applicable to both processes. As a result, the purpose of this report is to outline my

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experiences and how they reflect the true position on the high street in respect of AGC/Bingo venues, which is relevant to both Gaming and planning applications.

16. As noise and public nuisance is not a licensing objective under the Gambling Act, it is however, often raised at planning hearings as a reason why such an application should be refused. This often-expressed fear of disturbance does not, in my experience materialise, following the grant of a licence or following a variation to a planning application once approved.
17. In my experience of conducting Gambling Act investigations and attending Gambling Sub-Committee hearings, no statistical or video evidence has ever been produced to show that the current betting shops and AGC premises in an area create any of the crime and disorder problems alluded to in the representations. When conducting observations at Alcohol licensed premises, often in the early hours of the morning and in areas where Gambling premises are also located I have had the opportunity to note any conduct by customers of both types of premises.
18. My conclusion from these visits and observations is that the majority of crime, disorder and anti-social behaviour occurring in City Centres and Towns across the country is generated from late night alcohol licensed premises, to a lesser extent from betting shop premises and an even lower contribution from AGC type premises. My conclusions have remained unchanged since my service with Greater Manchester Police, despite the increase of the AGC/Bingo premises on the high street, as well as in motorway service stations and airport lounges.
19. There are several reasons for the differences alluded to above, including the fact that people tend to go to high street bingo and AGC venues on their own or in small numbers. An adult gaming centre regardless of floor space attracting more than 10 customers at one time would be highly unusual.
20. The actual number of customers is even lower between the hours of midnight and 0800 hours. Other than playing the machines there is no event taking place for customers to engage with each other, nor use the venues as a social meeting place. The demographic profile of the customers attending Betting shops and AGC/Bingo venues tends to be older and more mature than those visiting alcohol led premises.
21. During my overnight observations on high streets across the country I have not observed AGC/Bingo venues causing noise or disturbance issues in the early hours of the morning due to the age profile of the customer and the small number of clientele who use this type of premises during these hours.

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This is the opposite of what I have found in large bar/ nightclub venues on the high street where large numbers of young customers attend events involving the playing of loud entertainment and alcohol.

22. A group of young people attempting to enter and remain inside gaming venues would immediately be identified by staff. I have never encountered a situation during any of my extensive observations at these types of venues where young people sought to enter or remain inside any AGC or bingo licensed venues. On entering this type of premises staff immediately engage with you and often offer soft drinks, refreshment or other forms of courtesy. Another subtle but pleasing aspect of AGC's and Bingo type premises is the standard of their toilet facilities. These are always clean, unlike toilets in betting offices and alcohol venues which are often out of order or if open are uncleaned, disrespected by clientele and unhygienic. I believe this reflects the standards of behaviour and expectations of customers visiting an AGC.
23. The staff employed at a high street bingo or AGC premises are not engaged or distracted by taking or paying out on bets so they can spend more time on the "shop floor" observing customer behaviour and resolving any low level issues before they can escalate. This customer interaction allows the staff at these premises to be proactive in identifying vulnerable customers and intervene if necessary. The environment of a high street machine type premises is also generally cleaner and tidier than ordinary bookmakers as there are no need for betting slips, newspapers and pens which often get discarded on the floor.
24. As a result of this less intimidating environment many of the managers of high street machine premises are female and this was certainly the case in the high street premises I have visited. A further difference between high street machine premises and traditional betting offices are people tend to spend less time at a venue on each visit. They do not wait around the venue for an event to start or to finish. As a result of this, customers of high street machine premises do not tend to loiter at a premise other than when playing the machines and do not smoke at the front of the venue between events taking place. I have not observed any issues regarding customers congregating outside the high street machine premises observed during these periods of observations
25. In my capacity as a police officer, and more recently as a licensing consultant I have visited the Rochdale town centre area where a 24-hour machine type premises currently operates. The premises has operated at this location continuously for over 30 years, without creating concerns to the local police or licensing authority. The Rochdale town centre is consistently in the top 50 most deprived areas in the country.

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Gambling Act 1968

26. Under the Gambling Act 1968 application for a new premises licence would be submitted to the Magistrates Court for the area in which the premises would operate. Any person wishing to object to an application could present evidence and the Gambling Committee, guided by the local Gaming Board Inspector would consider the application and grant or refuse the application. Due to the restrictions on the published number of gambling premises in a location, the majority of objections to the new applications came from local operators who sought to prevent new businesses operating in their area. Any party who was not content with the Committees decision could appeal the matter to the Crown Court, decisions of which were used to formulate the licensing framework and afforded a consistency of approach which applicants and objectors could follow.

Gambling Act 2005

27. With the introduction of the Gambling Act 2005 jurisdiction on the grant or refusal of a new application for a premises licence came under the scope of the local authority with any appeal made to the Magistrates Court whose decisions were not binding. In my experience, one of the detriments of the new act was the removal of this evidence-tested approach to the decision-making process. A further consequence of the new legislation was a reduction in the role of the local gaming inspector.
28. Section 153 of the Act requires the Gambling Commission and Licensing Authorities to aim to permit the granting of a licence so far as is in keeping with the legislation and gambling commission guidance. Had Licensing Authorities adopted this section the onus on proving that a licence should not be granted would rest on those making representations against an application. In my experience, the majority of Licensing Authorities adopt the opposite position as that outlined in the legislation and aim to refuse an application unless the applicant is able to satisfy the committee that they will not undermine the licensing objectives.
29. Between 2010 and 2025 I attended licensing applications at local authority gambling act licensing sub committees and on rare occasions on appeals to Magistrates Court. During this period the grounds of the representations were predominantly made under the Crime and Disorder licensing objective, and to a lesser extent the protection of vulnerable people and protection of Children from harm objectives. The main evidence in support of such objections was the crime and disorder currently occurring in an area generally, and not the crime and disorder that is currently occurring at betting shops and AGC/Bingo premises; Nor what crime and disorder is likely to occur should a new application be granted in these areas.

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30. As stated above during my 30 years police experience and 15 years as an independent licensing consultant I have never seen any evidence that AGC's/ Bingo type premises undermine the Crime and Disorder licensing objective. It is therefore unsurprising that when challenged to provide evidence to support their position, those making representations, have been unable to do so.

31. This lack of evidence that AGC/Bingo venues create Crime and Disorder was illustrated in a 2022 case in Newcastle. Newcastle City Centre has a cumulative impact zone (CIZ) under the alcohol Licensing Act due to the high levels of alcohol related crime and disorder. A freedom of information request identified that the three AGC/ Bingo type premises in Clayton Street (within this CIZ) had only been the creator of 4 incidents in the previous 12 month period despite one of the units having a 24-hour licence to operate.

Jan-Dec 2021

Venue 1 (24-hour licence)	2 crimes recorded. 2 incidents
Venue 2 (Not 24-hour licence)	No crimes. 2 incidents
Venue 3 (Not 24-hour licence)	No crimes or incidents

32. It is unsurprising that requests for Freedom of Information relating to the number of incidents and crimes occurring at gambling premises are now being refused by police forces stating that it is a breach of data protection legislation. As a result, the only public access records that are available to operators and consultants is the police crime websites. A review of these websites can show the number and nature of crimes and incidents occurring in a location but are not venue identifiable, nor can the information be extracted to obtain causal factors.

33. In recent years, perhaps as a result of the number of cases being approved by Licensing Committees or overturned on appeal, those local authorities who seek to refuse applications and those who wish to make representations against new AGC/ Bingo licences have sought to prevent the application via the planning application stage. However, often the grounds of the representation against the application still relies on the misheld belief that these types of premises create crime, disorder and public nuisance in an area. Also, that beggars, street drinkers and other vulnerable members of society will be attracted to them and that children will try to gain entry to a premises.

34. As outlined above I have never observed any of these occurring in the numerous areas I have taken observations and given evidence to committees on what I have witnessed. Also, restrictions have been placed via the planning regime on the opening hours that venues can operate based on the same evidence that the premises will undermine the crime and disorder

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licensing objectives. In my experience of visiting 24-hour AGC/Bingo venues the premises become even quieter in the early hours of the morning and do not have a negative impact on the high street at peak times, as an alcohol licensed venue may do, between 2300 and 0400 hours on a Friday and Saturday night.

35. In a number of cases, where an application has been granted and representations feared the impact of the opening of an AGC/ Bingo premises, I have offered to return to the area on behalf of residents, local businesses and the local licensing department to conduct an investigation free of charge, should an area not continue in the same manner following the opening of a venue. At no time has any individual or group contacted me following the granting of an application requesting me to revisit an area.
36. I am also unaware of any licence that was granted despite representations being made that the Crime and Disorder, vulnerability or the children's Licensing Objectives would be breached, having their licence reviewed having failed to operate in the manner which I expected or consider to be the norm.
37. A further issue often raised in representations is the harm that is caused by irresponsible gambling in general. As this usually manifests itself away from the premises, I am not able to quantify this in regard to individual premises or the different operators that engage my services.
38. I have visited the Wood Green area in relation to both gambling and alcohol licence applications on numerous occasions and I am aware of the crime and social challenges in the area. I am familiar with the Licensing Authorities gambling policy. The purpose of this latest investigation was to assess the likely impact of extending the operating hours at Little Vegas, The High Road, Wood Green. The methodology used was to compare the current operation of the 24-hour Little Vegas venues in Ilford and Walthamstow with the current 24-hour operations on Wood Green. I therefore conducted each period of observations between 0100 hours and 0500 hours on both weekdays and weekends.

Little Vegas Wood Green

39. Little Vegas, Wood Green operates between 0800-0200 daily. It currently operates under a temporary planning permission for these hours. It is seeking to operate for 24 hours daily. A similar previous application was refused because insufficient material had been provided regarding numbers attending, numbers smoking outside, potential noise issues and if customers visited in vehicles or on foot. The remit of this investigation is to provide evidence which addresses those concerns.

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40. Also operating AGC's on Wood Green High Road are Admiral (x2), Merkur Slots and Palace. These other 4 AGC's operate 24 hours, 7 days a week.
41. Little Vegas Wood Green High Road has operated until 0200 hours daily since the 17th November 2023. I am unaware of any complaints that have been made regarding the management of the premises or noise nuisance created by its customers up to the current date.
42. To verify my conclusion that an increase in operational hours will have little or no impact on the amount of crime or anti-social behaviour in the area I have conducted a review of the recorded crimes and incidents in that location. Wood Green High Road comes within the Noel Park policing area of the Metropolitan force. Between December 2022 and October 2023 (prior to operating until 2am) the area recorded 4,049 crimes. After opening until 0200 the area recorded 194 fewer crimes between December 2023 and October 2024. During the same period the area recorded 4 fewer incidents (730 to 726) of anti-social behaviour than was recorded prior to operating until 0200 hours (source:police.uk website)

Little Vegas Ilford

43. The Ilford unit is in a pedestrianised area on Ilford High Road. It is predominantly business use with limited residential accommodation. The nearest residents being in apartments directly above the premises. There is a local authority-controlled Pan, Tilt and Zoom (PTZ) CCTV camera directly opposite the venue which appears to give a line of sight to the whole frontage and entrance. Other AGC's in the area are Admiral, Merkur, Game Nation and Royal. The unit has been operated at this location with a 24-hour licence since 26th October 2023.

Little Vegas Walthamstow

44. The Walthamstow unit is located in a pedestrianised area on Walthamstow High Road. It is a mixed-use area in terms of planning with both business and residential accommodation in flats above the ground floor shop units. There is a local authority controlled PTZ camera located at the junction of High Road and Palmerston Road, which appears to give a line of sight to the front of the premises. Other AGC's in the area are Admiral and Game Nation which also operate 24/7. The unit has operated at this location since 15th December 2023.

Observations

Ilford, Friday 21st March 2025

45. My first visit to Ilford town Centre took place on Thursday 20th March 2025. My observations on this evening commenced at 0050 hours and concluded at 0500 hours the following morning. My observations were recorded into a

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notes document from which I have extracted the incidents of note for this report.

46. On arrival in Ilford, I noted that 4 other AGC operators (Admiral, Royal, Merkur, Game Nation) were also operating 24-hour licences in the town centre. Two unhoused rough sleepers with associated bedding were sleeping in two empty retail unit doorways. At 0053 4 males were smoking and chatting outside Little Vegas and at 0106 these males got into a vehicle and left the area
47. At 0109 a male and female arrive in a car and enter Little Vegas. An HGV delivered products to Greggs opposite Little Vegas with the associated noise of a large delivery vehicle, metal cages and plastic bread trays being moved by the driver. At 0128 a member of staff sweeps the shop frontage. Between 0100 and 0200 85 pedestrians walk along Ilford High Road past Little Vegas. Six customers arrive (2 in a vehicle and 4 visit the venue on foot). 2 customers are seen to leave on foot. 14 customers are seen to smoke, drink soft drinks or use their mobile phones. The majority of these occasions were single individuals for less than a minute and never more than two at any one time.
48. At 0205 a member of staff is seen sweeping the footpath area outside Little Vegas. At 0240 a Superdrug branded articulated lorry delivers to the premises nearby, with the associated noise of metal cages and pallets being moved using steel wheeled pallet trolleys. The driver continues to unload until it leaves at 0255. Between 0200 and 0300 42 pedestrians walk past Little Vegas. 1 person is seen to arrive on foot. 7 people are seen to leave the venue (3 in a vehicle and 4 on foot). 10 people were observed outside, smoking, using mobile phones and drinking soft drinks.
49. At 0345 two police vehicles and an Ambulance travel through the pedestrianised area with their blue lights operating. They do not stop near Little Vegas but from the blue lights being stationary they appeared to deal with an incident at the town centre side of the pedestrianised area. Between 0300 and 0400 50 pedestrians walk past Little Vegas. 4 customers arrived, all on foot. 6 customers left, all on foot. 1 person was seen to smoke outside. 3 customers left to use the nearby Santander cash machine before returning inside.
50. At 0407 a passing male urinates behind one of the flower beds in the pedestrianised area. The male was not a customer of Little Vegas. At 0446 vehicles started entering the pedestrianised area to unload pop up market stalls and produce. Between 0400 and 0500 35 pedestrians walked past Little Vegas. 5 customers entered the premises (1 in a vehicle and 4 on foot). 5 customers left the venue (1 in a vehicle and 4 on foot). 5 customers were seen to smoke outside.

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51. No further noteworthy incidents occurred and at 0500 I ceased my observations and left the area.

Ilford, Saturday 22nd March 2025

52. My observations on this morning commenced at 0045 hours and concluded at 0500 the same day. The area appeared similar to that observed the previous night and the two rough sleepers were located in the empty unit doorways. At 0116 two males are drinking cans of lager on the public benches outside Little Vegas. They were not customers of Little Vegas and did not try to enter the venue. At 0130 the two males continue drinking from cans as they walk towards Ilford train station. At 0131 the Greggs delivery driver visits their premises opposite with the associated noise of moving metal and plastic cages.
53. Between 0100 and 0200 95 pedestrians walked past Little Vegas. 7 customers arrive, all on foot and 7 customers leave, all on foot. 4 customers were observed smoking outside. At 0215 3 males exit and leave the area on foot. They return at 0236 to collect a suitcase before walking towards Ilford rail station.
54. Between 0200 and 0300 68 pedestrians walk along Ilford High Road past Little Vegas. 2 customers arrive on foot. 3 customers leave on foot. 5 customers are observed smoking outside.
55. At 0334 a member of staff sweeps the footpath outside the venue. Between 0300 and 0400 47 pedestrians walked past Little Vegas. 3 customers arrived on foot. 4 customers left on foot. 1 customer was observed smoking outside. Two customers left to use the cashpoint before returning inside.
56. At 0410 a heavy goods vehicle enters the pedestrianised area near to Little Vegas and its occupants start to unload pallets of produce for the Saturday market. As they were using hand pulled pallet trolleys with metal wheels, they were making a considerable noise. At 0459 the rough sleeper walks away leaving his bedding and property in the shop doorway. Between 0400 and 0500 39 pedestrians walked along Ilford High Road past Little Vegas. One person arrived at the premises on foot. 3 customers left the venue on foot. No one smoked outside the venue during this time. No further noteworthy events occurred and at 0500 I ceased my observations and left the area.

Walthamstow, Sunday 23rd March 2025

57. I arrived in the High Road area of Walthamstow at 0040 hours and commenced my observations. Between 0100 and 0200 47 pedestrians walked past the Little Vegas unit. 5 customers entered the venue, all

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approached on foot. 3 customers were seen to leave on foot. 2 customers were seen to use the nearby cash machine before returning inside. 12 customers were observed smoking. Smokers re-entered after 1-2 minutes and never more than 2 customers were observed outside at the same time.

58. Between 0200 and 0300 31 pedestrians walked past the Little Vegas unit. 7 customers were seen to enter the premises on foot. 12 customers were seen to leave on foot. 10 customers were seen to smoke outside. 2 customers were seen to use the nearby cash machine, and 1 customer was observed using their mobile phone before returning inside.
59. Between 0300 and 0400 34 pedestrians walked past the Little Vegas unit. 6 customers were seen to enter the venue on foot. 8 customers were seen leaving on foot. 4 customers were observed smoking outside.
60. Between 0400 and 0500 16 pedestrians were observed walking past the Little Vegas unit. 2 customers were seen to enter the unit on foot. 4 customers were seen to exit the premises on foot. 3 customers were observed smoking outside. At 0500 I ceased my observations and left the area. Unusually, I did not note any other occurrences to report during this period of observations other than the customers entering and leaving and pedestrians passing by. No noise other than the road traffic along Palmerston Road could be heard. No noise or other nuisance was audible by customers from Little Vegas.

Walthamstow, Monday 24th March 2025

61. I returned to Little Vegas Walthamstow at 0050 hours on Monday 24th March and continued my investigations until 0500 hours when I left the area. The area appeared similar to my previous night's observations.
62. At 0140 hours a refuse collection vehicle travelled through the pedestrianised zone, past Little Vegas. The operatives were throwing bags of garbage and emptying litter bins into the rear of the vehicle. This was the only source of noise nuisance I heard. Between 0100 and 0200 25 pedestrians walked past the site. 3 customers entered the venue on foot. 5 males exited the venue, all on foot. 7 customers went outside to smoke but never more than 2 at one time. One customer exited and used the nearby Sainsbury's cash machine before returning inside.
63. Between 0200 and 0300 hours 23 pedestrians walked past the venue. 3 customers entered on foot. 1 person exited on foot. 7 customers smoked outside the venue, but never in groups larger than 2. 1 customer exited to use the cash point before returning.
64. Between 0300 and 0400 hours 19 pedestrians walked past the venue. 1 customer entered from a vehicle and 5 customers entered on foot. 8

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customers exited, all on foot. 8 customers smoked outside. Never in groups larger than two.

65. Between 0400 and 0500 21 pedestrians walked past the venue. At 0447 a member of staff sweeps the footpath outside the venue. No new customers were seen to enter the premises. 3 customers went outside to smoke, all individually. 1 male went to the cash point before returning inside. No noise nuisance was noted during this period or any incident of note. At 0500 I ceased my observations and left the area.

Admiral (117 High Road, Wood Green), Tuesday 25th March 2025

66. My latest visit to the Admiral unit at 117 Wood Green High Road took place on Tuesday 25th March 2025. My observations commenced at 0045 hours and concluded at 0500 hours the same morning. The area appeared similar to my previous visits to the area although some of the AGC's had changed ownership, and some retail outlets appeared to have closed down or rebranded.
67. At 0112 hours a London fire brigade vehicle with its blue lights operating attended at an incident in the pedestrian area on Lymington Avenue. At 0128 a refuse collection vehicle travelled along the Wood Green High Road past the unit. The operator stopped to throw bags of waste into the rear of the vehicle. At 0137 a police vehicle with blue lights and siren operating travelled at speed along the High Road but did not stop in the area. At 0155 a police vehicle with its blue lights and siren operating travelled along the High Road, but did not stop.
68. Between 0100 and 0200 66 pedestrians were seen passing the venue along the High Road. 4 customers were seen to enter on foot. 1 customer exited and got into a nearby vehicle. 1 customer exited on foot. 1 customer smoked outside.
69. Between 0200 and 0300 22 pedestrians walked past the unit. 1 male entered on foot. 1 male exited in a vehicle parked nearby. 3 customers exited on foot. 2 customers and a female staff member smoked outside. 1 customer used a nearby cash point before returning.
70. Between 0300 and 0400 19 pedestrians walked along the High Road past Admiral. 6 customers entered, all on foot. 7 customers exited the venue, all on foot. 2 customers were observed smoking outside.
71. At 0453 a mobile window cleaner is seen to clean the windows of some of the retail units in the immediate area. Between 0400 and 0500 42 pedestrians walked past the venue. 3 customers entered the venue on foot. 4 customers exited the venue on foot. 1 customer and the female member of

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staff were seen to smoke outside. No noteworthy incidents occurred and at 0500 I ceased my observations and left the location.

Merkur (91 High Road Wood Green) Friday 4th April 2025

72. My investigation continued by conducting observations outside Merkur Slots at 91 Wood Green High Road on Friday 4th April 2025, My observations commenced at 0050 hours that night and concluded at 0500 hours the following morning.
73. At 0140 hours a vehicle with an excessively loud exhaust system travelled along Wood Green High Road. At 0149 a vehicle is attempting to perform doughnuts along Wood Green High Road. Between 0100 and 0200 hours 27 pedestrians walked along the High Road past Merkur. 9 customers entered the venue arriving on foot. 8 customers were seen to exit the venue, all leaving on foot. 5 customers were seen to smoke outside but never in groups larger than two.
74. At 0202 a Metropolitan police vehicle with its blue lights and siren operating travelled at speed along the High Road without stopping. At 0216 a second vehicle with its sirens operating travelled along Wood Green High Road. At 0256 a refuse vehicle reverses from the High Road into Brampton Park Road. The vehicle has a loud audible reversing signal to warn pedestrians that it is reversing. Between 0200 and 0300 hours 21 pedestrians walked along Wood Green High Road. At 0254 4 customers enter from a vehicle and four persons entered on foot. 6 people exited, all on foot. 6 people were seen to smoke outside, all individually.
75. At 0436 a police vehicle with its sirens and blue lights operating travelled along Wood Green High Road. At 0327 a refuse vehicle collects rubbish along the High Road. Between 0300 and 0400 hours 16 pedestrians walked past Merkur Slots. 2 males enter from a vehicle and 2 males exit in a vehicle. 1 customer entered on foot. 6 customers exited on foot and 1 customer left on public transport. 7 customers smoked outside, the largest group being two.
76. At 0436 a Metropolitan police vehicle with blue lights and siren operating travelled along Wood Green High Road without stopping. Between 0400 and 0500 14 pedestrians walked past Merkur Slots. 1 male entered from a vehicle and 4 males exited in two vehicles. 4 customers entered on foot and 2 males exited on foot. 5 males were observed smoking outside. The largest group being three of the four who arrived by car. No other notable incidents occurred and at 0500 hours I ceased my observations and left the area.

Admiral and Little Vegas (9 & 17 Wood Green High Road) Saturday 5th April 2025

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77. I returned to the Wood Green area at 0050 hours on Saturday 5th April 2025 and continued my investigation by observing both the Little Vegas at number 17 (WGHR) and Admiral at number 9 (WGHR). I noted that a loading bay near to Admiral would provide parking for up to 4 vehicles. I noted customers from Admiral and Little Vegas using this parking when visiting the premises. I also noticed staff of the AGC's and non-customers using the parking spaces to visit the nearby cash machines at Tesco Express and Nationwide. At 0104 a Metropolitan police vehicle with blue light and siren operating travelled along Turnpike Lane without stopping. At 0107 a vehicle with an excessively loud exhaust system travelled along Wood Green High Road. At 0122 a further Metropolitan police vehicle travelled along Turnpike Lane and another vehicle with an excessively loud exhaust system travelled along the High Road. At 0143 2 motorcycles with loud exhaust systems travelled along the high Road,
78. Between 0100 and 0200 hours 78 pedestrians walked past the two venues on Wood Green High Road. During the same time period 9 customers entered Little Vegas on foot. 9 customers exited Little Vegas. All on foot. 4 customers were observed to smoke outside during this hour. At 0150 hours the shutters to Little Vegas were pulled down over the window and staff are seen clearing up.
79. Between 0100 and 0200 hours 9 customers were seen to enter Admiral on foot. 1 customer was seen to exit to a vehicle and 14 customers exited on foot. 5 customers were observed to smoke outside.
80. At 0210 and 0217 vehicles with an excessively loud exhaust system travelled along the High Road. Between 0200 and 0300 81 pedestrians walked past the two venues along Wood Green High Road. 4 customers were seen to enter from vehicles and 12 entered on foot. 4 customers were seen to leave in vehicles and 10 on foot. 8 customers were observed smoking outside. The largest group being 2.
81. Between 0300 and 0400 no traffic nuisance other than passing vehicles and buses was heard. 46 pedestrians were seen to walk past the venue. 3 customers arrived in a vehicle and 3 customers exited in vehicles. 6 customers entered on foot and 11 customers exited on foot. 8 customers were observed smoking outside the venue. The largest group was 4 but this was only the case for less than a minute as customers overlapped re-entering and exiting to smoke.
82. At 0417 a vehicle with an excessively loud exhaust system travelled along the High Road. At 0437 a male pedestrian urinated in the alleyway at the side of Admiral. He was not a customer of the venue. At 0448 a vehicle with a loud stereo system travelled along the High Road. Between 0400 and 0500 33

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pedestrians walked along Wood Green High Road past the venue. No customers were observed entering or leaving in vehicles. 9 customers entered on foot and 8 customers exited on foot. 5 customers were observed to smoke outside during this period. Nothing further of note occurred and at 0500 hours I ceased my observations and left the area.

Admiral and Little Vegas (9 & 17 Wood Green High Road) Sunday 6th April 2025

83. I returned to the Wood Green area at 0055 hours on Sunday 6th April 2025 and my observations ceased at 0500 hours that morning. The area appeared to be the same as my previous night's visit. At 0112 a vehicle with an excessively loud exhaust system travelled past the venues. At 0119 a vehicle with a loud stereo system travelled past the venues. At 0128 a police vehicle with its blue lights and siren operating travelled at speed along the High Road. Seconds later a helicopter could be heard in the nearby area. At 0135 a police vehicle with its siren operating travelled along Turnpike Lane. At 0150 a male opened the shutters at North London Hospice to retrieve their pedal cycle before closing the shutters at 0156.
84. At 0153 the shutters to Little Vegas were lowered over the window as staff prepared to close at 0200. At 0157 6 customers exited Little Vegas and immediately entered Admiral.
85. Between 0100 and 0200 hours 95 pedestrians walked past the two venues. During the same time period 1 person was seen to enter Little Vegas from a vehicle and 3 customers were observed leaving into vehicles. 9 customers entered, having arrived on foot and 21 customers were observed leaving on foot. 7 customers were seen to smoke outside.
86. Between 0100 and 0200 hours 1 customer was seen to exit Admiral in a vehicle, 17 customers were seen to enter on foot and 5 customers were seen to exit on foot. 5 customers were observed smoking outside.
87. At 0214 2 female members of staff lock up the venue and leave on foot. At 0233 a police vehicle with blue lights and siren operating travels at speed along the High Road. At 0237 a second police vehicle with blue lights and siren operating travelled along the High Road. At 0246 a vehicle with a loud stereo travelled along the High Road.
88. Between 0200 and 0300 70 pedestrians walked along the High Road past Admiral. 1 customer was seen to enter the venue from a vehicle and 1 customer exited into a vehicle. 4 customers entered on foot and 5 customers exited on foot. 10 customers were seen to smoke outside.

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89. At 0324 and 0326 vehicles with a loud stereo travelled along the High Road. At 0340 a vehicle parked on the pavement outside Little Vegas and the driver delivered mail to several nearby addresses.
90. Between 0300 and 0400 40 pedestrians walked past Admiral. 1 customer was seen to enter from a vehicle. 1 customer entered on foot and 6 customers exited on foot. 9 customers were observed to smoke outside.
91. At 0418 an Ambulance passed through the junction of High Road and Turnpike Lane with its siren operating. At 0422 a police vehicle travelled through the same junction with its siren sounding. At 0435 a male urinated against the wall of Farmfoods. He was not a customer of Admiral. At 0453 and 0456 police vehicles travelled through the junction on Turnpike Lane with their sirens operating.
92. Between 0400 and 0500 39 pedestrians walked past Admiral. 1 customer was seen to exit into a vehicle. 1 person entered on foot and 6 customers exited on foot. 14 customers were observed smoking outside. The largest group was three people at 0458. No further incidents of note occurred and at 0500 hours I ceased my observations and left the area.

Palace Amusements (49 High Road Wood Green) Monday 7th April 2025

93. I continued my observations and investigation on Monday 7th April 2025 outside Palace Amusements 49 Wood Green High Road. I arrived in the area at 0050 hours and my observations ceased at 0500 hours the same morning. On arrival I noted a large refuse vehicle was in the process of collecting rubbish bags from the footpath and waste bins along the High Road.
94. At 0123 a security siren from one of the nearby business premises commenced and continued to sound for exactly 15 minutes before stopping. At 0129 a member of staff from Urban Chocolatiers was observed smoking outside the foyer of Palace Amusements but did not enter. At 0143 a vehicle with a loud exhaust system travelled at high speed along the High Road. At 0155 a police vehicle travelled along the High Road at speed with its blue lights and siren operating. Kaspas Deserts, Urban Chocolatiers and Sweet Town Grill partially closed their shutters but delivery drivers and riders continued to visit the venues to collect take away orders. This was seen to continue up to the conclusion of the observations at 0500 hours.
95. Between 0100 and 0200 hours 31 pedestrians were seen to walk past Palace Amusements. No one entered or left in a vehicle. 9 customers entered on foot and 5 customers exited. 10 customers were observed smoking outside with no groups larger than 2.

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96. Between 0200 and 0300 22 pedestrians were observed walking past Palace Amusements. One customer was seen arriving in a vehicle at 0227 and was seen leaving at 0232. 2 customers were seen to enter on foot and 8 customers were observed leaving. 4 customers were seen to smoke outside.
97. At 0306 a vehicle with a loud stereo system was seen and heard travelling along the High Road. At 0312 the security alarm at a nearby business started again and stops 15 minutes later. Delivery drivers and riders continue to visit the take away venues. At 0339 a further refuse vehicle is heard removing rubbish along the High Road. At 0344 a vehicle with a loud audio system travelled along the High Road.
98. Between 0300 and 0400 hours 11 pedestrians walked past Palace Amusements. No customers were seen to enter the venue from a vehicle. 1 person entered on foot and 5 customers were seen to leave. 1 person was observed smoking outside.
99. At 0405 staff from the venue can be seen to sweep and mop the outside area. The Khyber mini market remains open and deliveries continue to be collected from the Sweet Town Grill and Urban Chocolatiers. No one was seen to enter the venue from a vehicle and 1 person was seen to enter and exit on foot. 1 customer and 2 male staff are seen to smoke outside. At 0456 hours two members of staff were seen to lower the shutters and the premises appeared to close. I conducted a google search of the premises to confirm that it was licensed to operate 24/7. Between 0400 and 0500 hours 8 pedestrians walked past the venue. No further incidents of note occurred and at 0500 hours I left the area.

Summary of observations March 2025 and April 2025

100. From my record of observations, I have produced a table of the venues visited and the results of my observations (exhibit reference letter DJB 2 refers). From these records I can state that the Friday and Saturday nights observations in Ilford were the busiest in terms of people using the gambling venues and general footfall through the area.
101. The area with the loudest ambient sound levels was Wood Green High Road due to the Ilford area being within a pedestrianised area with restricted vehicle access for loading and unloading of goods. The quietest area for ambient sound was Walthamstow due to it also being within a restricted access zone.
102. Having conducted observations in many London Boroughs it is evident that no two areas are identical. However, there are many common factors which I see in all areas similar to those that I observed during this latest and previous investigations in the Wood Green area.

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103. Ambient noise in such areas is always higher than what is found in smaller town centre locations. This is created by many factors including the passing of traffic along a main road and pedestrians passing by who have no connection to the gambling venues. Added to these continuous noise occurrences that a resident may develop a tolerance to are sporadic outbreaks of noise which gambling operators have no control over.
104. Examples of these occurrences observed and heard during this period of observations echo those that I have previously heard in this and other London Boroughs. The largest noise disruption heard was the passing of emergency service vehicle with their sirens sounding and the security alarm of a local business sounding. The collection of rubbish during times when the roads are quieter can often disrupt the sleep of residents, especially those vehicles with warning sirens to alert pedestrians and cyclist that a vehicle is reversing or is turning left.
105. Other noise was regularly created by inconsiderate drivers attempting noisy turns or doughnuts in the High Road or those with loud car stereos. Another noise factor was created by adapted exhaust systems that can be clearly heard above the ambient sound of normal traffic noise. Added to these sounds are the late-night bus services and passing delivery vehicles which also use the early hours to conduct deliveries to premises when less traffic is on the roads.
106. By comparison with these other ongoing external noises the potential of small numbers of customers arriving and leaving gambling venues in vehicles or on foot is negligible. Noise from small numbers of customers smoking outside was also not heard from a short distance away. Any gambling venue may have a customer who shouts out to acknowledge or greet a friend which, when it happens in the early hours of the morning can be disruptive. But in my experience generally, and what was evident from these latest observations, such occurrences are rare.

Planning Inspectors report

107. The purpose of this investigation was to address the questions posed by the previous application. I am unaware of any similar type of research that has been conducted in relation to the usage of customers of Adult Gaming Centres over such a range of locations and across such an extensive time period.
108. Regarding customers arriving in vehicles or on foot during this period of observations 16 customers were seen to exit into vehicles whilst 220 customers exited venues on foot. This did not account for a true reflection of the number of vehicles as on occasion two, three and up to four customers

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would depart in the same car. The actual number of vehicles is therefore much less. It was noted that the parking areas used by customers of gambling establishments was equally used by drivers and riders attending fast-food venues and people withdrawing money from nearby cash points.

109. Regarding customers smoking outside venues the norm was for single or pairs of customers and venue staff to smoke outside at any one time. On rare occasions when smoking periods overlapped three, and on one occasion 4, people were observed outside at the same time. The average length of time a smoker was outside would be between 1-2 minutes, so such occasions were rare and during some periods did not occur at all.
110. The largest congregation of customers observed outside a venue was at 0157 hours on Sunday 6th April 2025 when 6 customers exited Little Vegas at the same time. This occurred because the venue was due to close at 0200 hours. I observed that all six of the customers immediately entered the Admiral at 9 Wood Green High Road. The refusal of the planning permission aiming to reduce the potential for disturbance by customers was not achieved as none of these customers left the area. The direct opposite of what was intended occurred, with 6 customers leaving the venue at the same time due to it closing at 0200.

Conclusion

111. In my experience AGC/ Bingo venues are now common sights in airport lounges, motorway service areas and local high streets. Having visited a large number of these sites in different locations I have never seen any evidence of them creating crime and disorder or being an attractive location to vulnerable individuals or young people. My experience leads me to believe that Gambling in locations where trained staff are available to respond and observe customer behaviour can only be safer than gambling on machines at unstaffed venues or on line where 52% of all gambling now takes place.
112. In many of the areas visited machine companies already operated sites successfully and without criticism from the local enforcement authorities. I have been able to visit operational sites in these other areas and confirm that their operation did not lead to issues of crime and disorder nor did they attract street drinkers, beggars or other vulnerable individuals. I am unaware of any concerns being raised in respect of any of these areas since the licences were approved.
113. There are many social issues, criminality and disorderly conduct visible on most high streets in the country. In my experience the granting or a refusal of an AGC/ Bingo licence in these areas does not increase the likelihood of such instances occurring. It is also unlikely to reduce the number of the occurrences in an area that were previously taking place.

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114. Applications by Chongie Entertainment Ltd to open premises in a location does not normally introduce anything new into an area that is not already available to the local community. I have never seen any evidence produced at Gambling Committee or planning hearings that would lead me to believe that the granting of a 24-hour AGC into most areas would undermine the licensing objectives.
115. At paragraph 16, 17,18 and 19 above I outlined what I consider to be major differences between a betting office premises and a AGC/Bingo premises. What I have observed nationally reinforces my experiences outlined above. Although the main cause for concern appears to be the fear of crime and disorder and protection of vulnerable people, this view is not supported by the record of incidents at their venues collated by Chongie. I have not observed any conduct or received other conflicting evidence which would cause me to reconsider my position. In my experience the change of a premises from a 18-hour daily operation, to a 24-hour operation will provide an increased visible presence to Wood Green High Road and reduce the likelihood of crime, disorder and anti-social behaviour in the area.

Darrell Butterworth

8th April 2025

Appendix

Exhibit reference letter DJB1 - Areas and dates previously visited to conduct gaming investigations

Exhibit reference letter DJB 2 – Table of movement around AGC's during this Investigation

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Exhibit reference letter 1

Areas visited in respect of Gambling investigations

March 2013 I spent 3 days in the London Borough of Newham visiting 111 different betting shop premises to observe customer usage and monitoring their compliance with the Gambling Objectives.

In **April 2013** I spent 7 days in the London Borough of Newham visiting 109 different betting shop premises to observe customer usage and monitoring their compliance with the Gambling Objectives.

In **May 2013** I spent 5 days in the London Boroughs of Brent and Haringey visiting 174 different betting shop premises and monitoring customer usage and their compliance with the Gambling Objectives.

November 2013 I spent 2 days in the London Borough of Newham visiting 13 betting shop premises to observe customer usage and their compliance with the Licensing Objectives.

In **December 2013** I spent 4 days in the London Borough of Newham visiting 24 different betting shop premises to observe customer usage and their compliance with the Licensing Objectives.

In **April 2014** I spent 4 days in the Haringey area of London visiting several betting shop premises and conducting observations on criminal and antisocial behaviour.

August 2018 I spent 1 day in the London Boroughs of Camden, Tottenham and Kilburn visiting Gambling Licensed Premises. In these areas similar concerns had been raised by local councillors and the Public Health Authority that the venues would lead to increased crime and disorder in the area and vulnerable people would be adversely affected. Whilst conducting these visits I did not observe any of the issues raised in the representations submitted in respect of that application.

August 2020 I spent 2 days in the Rochdale and Droylsden suburbs of Manchester, conducting observations. The application subject of those observations received a number of representations from church leaders, residents and local councillors regarding the deprivation in the locality of the proposed venue, crime and disorder and the locality being located near to other gambling type and alcohol led premises. During my observations I found no evidence to support these representations and the licence was granted following a hearing.

September 2020 I spent 2 days in the Harehills area of Leeds conducting observations in respect of an application for a new Gambling Premises licence. The Harehills area is one of the most socially deprived in the City and is prominent in many of the indices used to measure social deprivation. In the same month I also attended the High Road, Tottenham visiting a Licensed Gambling Premises including 4 betting offices.

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October 2020 I spent 2 days in Blackpool conducting observations in respect of an application for a new gambling premises licence. Already in the area were 3 adult gaming centres and 3 betting shops.

At the end of **October 2020** I spent 2 days in Newbury visiting Licensed Gambling Premises.

In **December 2020** I spent 1 day in the Acocks Green area of the West Midlands visiting betting shops and gaming centres.

In **February 2021** I spent 2 days in the Worcester City Centre area conducting observations in respect of an application for a new Bingo licence.

In **February 2021** I spent 1 day in Doncaster town centre conducting observations in relation to a new application there on behalf of the current applicant.

In **April 2021 and August 2021** I spent 2 days in Walsall observing current gambling venues.

In **September 2021** I spent 3 days in Spalding Lincolnshire, observing current gambling venues.

Also, in **September 2021** I spent 1 night in Newcastle observing current gambling venues.

In **October 2021** I spent 1 night in Rochdale observing a 24-hour bingo machine premises and a 24-hour AGC. These observations took place from 2200 hours until 0600 hours. The purpose of this visit was to observe these venues throughout the night to see if they attracted, street drinkers, homeless or other vulnerable groups. Although homeless, street drinkers and beggars were observed around the town centre, none of these groups attempted to gain access to the two units despite them being the only premises open after 0400 hours.

In **October 2021** I spent a weekend in the London borough of Hammersmith observing Adult Gaming centres, Betting Shops and Bingo premises.

In **November 2021** I spent 2 days in the London Borough of Leyton, visiting betting shops and AGC's in relation to a planning application.

In **April 2023** I spent 6 days in the boroughs of Wood Green, Croydon and Crawley visiting AGC's and gathering crime and disorder statistics in relation to a new application.

In **August 2023** I spent 3 days in the London Borough of Edmonton conducting observations and visiting AGC's in respect of a new gambling application. In the same month I spent 3 nights in the London borough of Edgware in relation to a new gambling venue.

In **December 2023** I spent 2 days in the town of Hayes taking observations in and around betting shops and AGC's.

In **April 2024** I spent 5 days in Halifax, Oldham, Bradford and Sheffield visiting betting shops and AGC's in relation to a gambling licence application.

In **June 2024** I spent 2 days in Cricklewood making observations in relation to a planning application.

In January 2025 I spent an over night period of observations in Cricklewood observing AGC's in relation to a new gambling application.

In addition to the above Gambling venues, I have conducted thousands of hours of observations in relation to alcohol led venues. These venues are often located on high streets which contain a mixture of alcohol and gambling licensed premises.

Signature *D J Butterworth*

Exhibit reference letter DJB 2

Table 2 Record of observations

*Little Vegas closed at 0200 hours

** Same footfall count and period 0100-0200 for both premises

Date	Vehicle in	Vehicle Out	Enter on foot	Exit on foot	Pedestrians	Smokers	Total
Ilford, Friday 21/03/2025	3 customers	4 customers	13 customers	11 customers	212	30 customers	273
Ilford, Saturday 22/03/2025	0	0	13 customers	16 customers	249	10 customers	278
Walthamstow Sunday 23/03/2025	0	0	20 customers	27 customers	128	33 customers	208
Walthamstow Monday 24/03/2025	0	0	11 customers	14 customers	88	25 customers	138
Admiral (117 WGHR) Tuesday 25/03/2025	0	2	14 customers	15 customers	149	8 customers	180
Merkur (91 WGHR) Friday 04/04/2025	7 customers	6 customers	18 customers	23 customers	78**	23 customers	155
Little Vegas (17 WGHR) Saturday 05/04/2025 *	0	0	9 customers	9 customers	78**	4 customers	100
Admiral (9 WGHR) Saturday 05/04/2025	7	8	36 customers	43 customers	238	26 customers	238
Little Vegas (17WGHR) Sunday 06/04/2025 *	1 customer	3 customers	9 customers	21 customers	95**	7 customers	136
Admiral (9 WGHR) Sunday 06/04/2025	2 customers	3 customers	23 customers	22 customers	95**	38 customers	183
Palace Amusements (49 WGHR) Monday 07/04/2025	0	0	13 customers	19 customers	8	18 customers	43

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