

APP 3

LETTERS OF REPRESENTATION
FROM INTERESTED PARTIES
INCLUDING TRADE
REPRESENTATIONS

13-8-07
Money
Thanks

FAO - Dalika Barnett
Licensing Team
1x slip
7x pages petition - 51 signatures

hand-copy of
letter in post
M Petrov
P.O. Box 265129
NCS 30F
Tel/fax 83521020

51
+ 122 previous
173 total

+ petition signatures sent in by others = Grand Total = ?

PROTECT OUR COMMUNITY'S CHILDREN AND VULNERABLE PEOPLE FROM EXPOSURE TO BETTING PREMISES

I/we the following undersigned, residents and traders, very strongly oppose the granting of a "betting (other) premises licence" at 507 Green Lanes N4 1TB to Metrobet Ltd.

The location of 507 Green Lanes, directly opposite Harringay's main post office by the junction with Warham Road, is just around the corner from South Harringay Primary school and nearby Woodlands Park Nursery. Many of our vulnerable people use the crown post office directly opposite 507 Green Lanes, as do families.

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NAME	ADDRESS
Ms BRESAN TUNA Bin	495 Green lanes N4 1AN
Mrs. Zilker Has	191 Nightingale Road H13
M. Mikail HAZAR	Green lanes road
Mrs Elif Kaya	12 Coleman Mansions Crouchhill N8 3EJ
Mr. M. Mehmet	2 BRADWELL ROAD
Mr. I Zekioglu	29. Federation Road SE2 0JT.
Mr. E. Zekioglu	29. Federation Road SE2 0JT
M. Tezcel	41 Borwick Avenue
H. Eskura	326 St Ann's Road
K. Halik	DYNEVOR ROAD

Please send this petition to:

Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

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NAME	ADDRESS
<i>Muzayyid</i>	KYNASTON R.D N16
Mr. A. S. AKAR	348, St. Ann's Rd. N15 3TA
Mr. Hasem	1. AN REGENT'S.
G COSTA	29 WILLOWBY RD N8 5TE
S. Syed	87 Thetford close N13 6AU
DAPHNE TIBBS	20 BERTRAM STREET N19 5DQ
LOUISA TIBBS	20 BERTRAM ST. N19 5DQ
J. Huseyin	45 McCall Ave N7 0PT.
S. DAVIS	FABET St. - E8'
R. Peelo	FLAT 201 MERLIN HSE, EN3 4QW-

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NAME	ADDRESS
N. Peeroo	FLAT 201 MORUN HSE
I. Poulos	64 Lealand Rd N.15 6J7
Rabive	26 B Park Avenue N22 7EX
OShokry	30th Landgate Rd N17 6HE
Huseyin ULUSOY	18 - Reynardson Rd. N17 7DX
LEFTERIS GEORG	88 ROYAL COLCEBE ST
CTECCHIO	8 MASSIE ROAD E8
H Saleh	124 Wightman RN4 1RL
F. Shukru	9 Brick Lane Enfield
S Solis	107 Perth Rd N22 5QG

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NAME	ADDRESS
GEORGE EDWARD ROBERTS	66 FADE RD HARRINGAY LONDON N4 1DH
Susanna Fortune	The Garden Ladder 501 Green Lanes London N4 1AL
Simon Walters	501A GREEN LANES, LONDON, N4 1AL
Ronald Ford	5 UNPRELUCE LONDON N4 1RY
Bruce Coker	5 UNPRELUCE ROAD, N4 1RY
T.P. JOLLEY	50, WOODLANDS PK RD, N15 3RX

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NAME	ADDRESS
J. Wainwright	106 PEMBERTON RD NH
M. Petrov	PO BOX 45129, N15 3XF

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NAME	ADDRESS
Ruth Campbell Hill	35 Warham Rd N4 1AR
Maggie Elmore	595 Green Lanes N8 0RE
Reneal Thomas	35 Warham Rd, N4 1AR
J.R. G. Smith	599. Green Lane N8-0RE
J. Whyte	1 Warham Rd N4 1AR

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NAME	ADDRESS
G Winston	69 Bercsford Rd N8
R. S. Patel	491 GREEN LANES N4
R. Walker	27 Warham Rd N4
T. LECLAIR	70 KIMBERLEY GARDENS N4
McGUINN	161, WIGHTMAN Road N4
CICININ	120 Pemberton Rd N4
P. Patel	491, Green Lanes N4 1AL
PETER Q.	8. SALISBURY ROAD N4

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FAO - Dalina Barnett
Licensing Team
1 X Slip
1 X Page

To supersede
previous
representation

From: Mario Petrov
8352 1020

Ms D. Barrett
 Licensing Team
 Civic Centre
 Wood Green N22
 11-8-07

Mario Petrov
 Po Box 45129
 London N15 3XF
 tel/fax 8352 1020

Re: Betting (other) Premises License - 507 Queen Lanes N4

Dear Sir

I very strongly object to the granting of a 'betting (other) premises license' for 507 Queen Lanes N4 to Metrolat Ltd, on the grounds that it will overly expose our community's children & vulnerable people to an activity only adults can lawfully indulge, & one that is of dubious & highly contentious value as a positive contributor towards a cohesive community. Gambling is an activity that is highly offensive to the many locally established faith groups, & to non-gamblers, & is another reason to take into account.

Many families, vulnerable people & members of faith groups use the crown post office located directly opposite on the corner of the Queen Lanes/Wanham Road junction, & the proposal is just around the corner from South Haringay Primary School & nearby Woodlands Park Nursery, making an in-your-face impact on these significant & important sections of our community unavoidable.

The area has an existing number of gambling premises making monitoring difficult & which are a cause of concern, given the number, in terms of potential crime & disorder, as a consequence of the high number of these gambling establishments clustering together there is a danger of the locality proving to be an attraction to vulnerable people & to teenagers causing them to congregate & leading to anti-social behaviour, & crime & disorder.

Since 2002, when the area's serious problems were extensively reported in the national media, many residents, residents' groups & businesses, in partnership with the council, have worked tirelessly & significant resources have been invested to turn the area around to create a sense of cohesive community. I am now extremely concerned, & even frightened, that all this good work shall be undone.

Please do not grant a license for this proposal which seriously threatens our well-being & our chance for a normal life.

Thank you for your time & attention.

yours sincerely

M Petrov

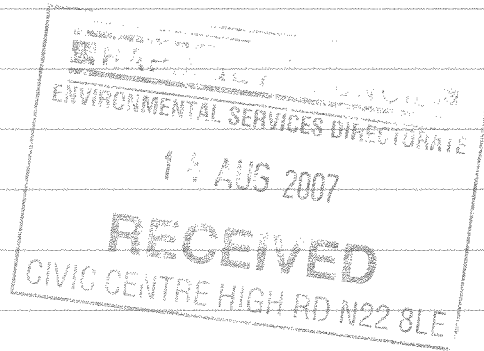
In addition, there was no consultation with the community & there seems to be some confusion about the timing of the display of the notice.

Two of the three Haringay ward councillors were uncertain whether they had been notified, the third was unable to be contacted. May I suggest that in response to the Gambling Act 2005 the council produces a weekly licensing list along the lines of the weekly planning list - for all interested parties.

50A Salisbury Road
Haringay
London N4 15Z

12/08/07

Ms D. Barrett
Licensing Team
Civic Centre
High Rd
Wood Green
London N22 8LE



Dear Ms Barrett,

I am really concerned that another betting shop may be granted a premises licence at 507 Green Lanes N4 1TE. There is already a Ladbrokes premises diagonally opposite. Many children attend local schools in the area and walk along Green Lanes on their way. Do we really want our children to grow up thinking this is what we do with our money or rather what their fathers do with their wages. Where are the male role models, always is the betting shop?

There are many vulnerable people frequenting Green Lanes. At present there are several long time beggars regularly asking for money for the phone, a taxi, a meal, a drink etc and when we do believe the source of their request and hand over money, they go straight into the nearest betting shop. I have foolishly handed over money on a few occasions and witnessed the result. Why does the Council wish to put more temptation in the way of people who probably do not have enough money to cope with their family expenses or look after themselves.

Green Lanes is becoming a pleasant community shopping area. It used to be rather a run down dump. Why

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NAME	ADDRESS
Rishma Shame	No 55, Basement flat
Sally Francis	No 73 PEMBERTON RD
LESLIE KINNEAR	29 PEMBERTON RD.
RUTH MUNDY	89a PEMBERTON RD
R TAYLOR	103a PEMBERTON RD
J. Shah	115 Pemberton Rd
John M. Pertin	55 Pemberton Rd
ANNE HANSON	16 SALISBURY RD N4
Camela Emmerson	50 Salisbury Rd
Andrew Green	52 Salisbury Rd.

Please send this petition to:

Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

Rachel Cullen
16e Grand Parade
London
N4

Licensing Team
Environmental Services
Civic Centre
High Road
Wood Green
N22 8LE



8th August 2007

Dear Sir / Madam,

License application for a Betting Shop, 507 Green Lanes

I write to object to the current application by Metrobet to allow the above premises to be used as a betting shop.

There are already too many betting shops in the immediate area, including Ladbrokes on the corner of Green Lanes and Salisbury Road, almost immediately opposite. More will further detract from the area and there will be an increase in people loitering, litter and noise. I would prefer to see more shops or café's in the area.

I would, therefore, ask you to take my comments into account and request that the application is refused.

Yours sincerely

Rachel Cullen

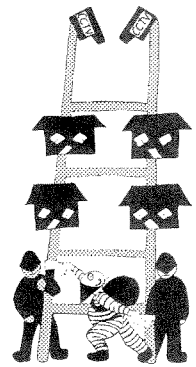
LADDER COMMUNITY SAFETY PARTNERSHIP

Incorporating the Are You Sure? campaign.

P.O. Box 32109 London N4 1GN

Telephone: 07931 761 558

...keeping crime off



the "Ladder"



Daliah Barrett
Environmental Control Service
Civic Centre
Wood Green
London N22 8LE

9 August 2007

Dear Ms Barrett

Premises licence: Betting: 507 Green Lanes, N4 1TB

The Ladder Community Safety Partnership (LCSP) contains representatives of Neighbourhood Watches and Residents' Associations from the 'Ladder' roads, adjacent to Green Lanes, Haringay, and from Wightman Road and Green Lanes itself. We are an independent group, although working in partnership with Haringey Council and the Metropolitan Police where appropriate.

We are writing to you as members of the LCSP to oppose this application.

We believe that in the context of the well known problems in the area, coupled with high-density residential accommodation and local schools, granting permission for yet another Betting Shop in Green Lanes, Haringay, would be against two of the three key Licensing Objectives of the Gambling Act 2005:

- Preventing gambling from being associated with crime or disorder
- Protecting children and other vulnerable persons from being harmed, or exploited by gambling

In particular, we note the relevance of the following statement in the Council's Licensing Policy Statement:

'General Principles: when determining an application to grant a Premises Licence or review a Premises Licence, regard will be had to the proximity of the premises to schools, vulnerable adult centres or residential areas where there may be high concentrations of families with children'.

The premises is located in the heart of Green Lanes, Harringay, an area which already has four betting shops nearby. Indeed, there is one directly opposite the proposed site and another just a few doors away. In making this point, we are not basing our argument on over-supply or likely demand, but rather on the likely over-exposure of children and vulnerable persons to gambling premises.

There is an important issue of cumulative impact for children who are especially likely to be aware of the proposed betting premises as it is located at the corner of Warham Road, and Green Lanes, directly opposite Harringays's main Post Office, which, of course, is used by large numbers of children and young people (with or without their parents) and vulnerable adults.

There are particularly large numbers of children both living in the area, and walking to and from school, because of the proximity of South Harringay Infants and Juniors School and Woodlands Park Nursery. Furthermore, because of the nearby mental health facilities in St Ann's Hospital, there is known to be a much higher than normal number of vulnerable adults both living and passing through this part of the Borough. There are also above average numbers of vulnerable adults on very low or fixed incomes, who can ill afford to lose any of their money in a betting shop which will no doubt aim to project an attractive and welcoming environment to draw in potential customers.

The LCSP is very concerned at the likely impact on all of these people if a licence is granted for the proposed premises, which occupies a very large and high profile site, at the corner of a busy junction, with residential accommodation not only behind (in Warham Road) but also adjacent and opposite (both in Green Lanes and along Salisbury Road).

Residents, traders, the police and Haringey Council have all been working hard to try to improve Green Lanes since the outbreak of violence and major crime in the area in November 2002. This has led to the creation of the Green Lanes Strategy Group which, by bringing everyone together, has achieved a lot of positive outcomes for our area. We are therefore very anxious to ensure that a surfeit of gambling activity in Green Lanes does not become a source of renewed crime and disorder.

For all these reasons, very large numbers of local residents, backed by all of our Ward Councillors, have signed a petition opposing the new betting licence, and support the

LCSP in writing this letter of objection. We are sure that the Licensing Sub Committee will give careful attention to all of these arguments before reaching its decision.

Yours sincerely



on behalf of the LCSP

[Approved by the representatives of Neighbourhood Watches and Residents' Associations in the following Roads:]

Representation from Green Lanes and the following Roads:

Umfreville Road	Woollaston Road
Burgoyne Road	Cavendish Road
Pemberton Road	Warham Road
Seymour Road	Hewitt Road
Allison Road	Beresford Road
Effingham Road	Fairfax Road
Falkland Road	Lausanne Road
Hampden Road	Sydney Road

S-8-07

FAO - Dahlia Barvett

Licensing Team

1 X Slip

12 X Pages with 122 petition signatures

From: Mario Petrov

8352 1020

More to come:

PO Box 45129, London, W15 3XF

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NAME	ADDRESS
CLL - BRIAN HALEY	LBH
Mr Karen ALEXANDER	LBH
Mr Nilgun Canver	n
Mr Carolyn Baker	.
Luke ODwyer	N8 ONP
Eileen ODwyer	122 Falkland Rd N8
FATOS BEGIRI	18 ^B DUCKETT RD. N4
KAROL GROUNSKI	106 WARHAM ROAD N4
KONRAD KONOPKA	106 WARHAM ROAD N4 1AU
Alan Millard.	108 WARHAM RD N4 1AU.

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NAME	ADDRESS
<i>A. Shire</i>	54 Pemberton Road, London
<i>U. Paine</i>	59 Pemberton Rd London
<i>J. P.</i>	54 Beresford Road
<i>U. Paine</i>	54 Beresford Road
<i>F. R. Scree</i>	97 Pemberton Rd
<i>La Vance</i>	100 Pemberton Rd
<i>K. A. W.</i>	16 TEWKESBURY CLOSE.
<i>H. Harris</i>	102 Pemberton Rd
<i>K. Harris</i>	"
<i>Mrs & Mr. Mathews</i>	102 Pemberton Rd.

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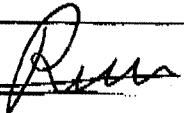

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NAME	ADDRESS
Nurto Mohammad	10b Warham Road N4 1AT
JAMES BARRY	104 WIGHTMAN ROAD N4 8DC
Adam Skventon	61 Wightman Road N4 1A5
N MARLONI	4 Pemberton Rd N4 1AZ
C. GORDON	22 PEMBERTON RD. N4 1AZ
KIM HENRIKSEN	30 PEMBERTON RD N4 1AZ
LINDA STEPULENAGE	32 PEMBERTON RD N4 1AZ
J. MULOUMBO	40 PEMBERTON RD N4 1A7
	42 Pemberton Rd N4 1AZ
	46 Pemberton Rd. N4 1AZ

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NAME	ADDRESS
MITAL JETHWA	110 WAKEMAN RD, HARRINGAY, LONDON N4 1AU
KULDEEP JETHWA	110 WAKEMAN RD, HARRINGAY, LONDON N4 1AU
NISHA JETHWA	" "
VISHAL JETHWA	" "
JAYSHREE JETHWA	" "
SURENDRANATH JETHWA	" "
RAJUBA JETHWA	" "
PRAFUL JETHWA	" "
DEAN DUNTON	108 " "
MAGGIE SULLY	100 Warham Road, N4 1AU.

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NAME	ADDRESS
Sam Hall	100 WARHAM RD N4 1AU
TERRY VANHORNE	80 WARHAM RD N4 1AU
RUTH VANHORNE	" "
VIOLET VANHORNE	" "
REUBEN VANHORNE	" "
JOHN DOHERTY	24 "
GILL DOHERTY	
GRAHAM TUCK	18 WARHAM ROAD, N4 1AT
HELEN BOWELL	18 WARHAM ROAD, N.4 1AT.
BEN STEVENSON	61 WIGHTMAN RD, N4 1RJ

Please send this petition to:

Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

PROTECT OUR COMMUNITY'S CHILDREN AND VULNERABLE PEOPLE FROM EXPOSURE TO BETTING PREMISES

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NAME	ADDRESS
HASAN	108 WARHAM RD N4 1AU
SUZANA	104 WARHAM RD
CHANEL DAVIS	234 Woodship Lane N17 6GJ
M. CHISHOLM	41 WARHAM RD N4 1AR
L. Lettice.	94, Warham Rd.
O. BOZNOVA	20 Seymour Rd
H. AZD	78 WARHAM
ZENI. XHINB)	111. SEVEN. SISTER
Fahima	44 Warham Road N4 1AT
COSTAS KROV	32 WARHAM R.D LONDON N4. 1AT.

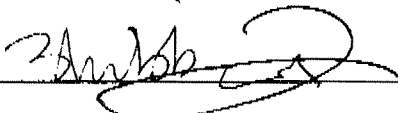
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NAME	ADDRESS
MANZI	84 WARHAM ROAD
B Hochmett	86 WARHAM ROAD
B SWIFT	89 WARHAM RD LONDON N4
A. SWANSTON	89 WARHAM RD LONDON
	56 Warham Rd.
P. Somerhal.	42, Warham Road.
J Gargella	28 Warham Road
Anna Keafou	26 WARHAM ROAD
C. Mordwelli	16 WARHAM ROAD
M Anderson	8 Warham Road.
David Jones	8 Warham Road.

Please send this petition to:

Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

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NAME	ADDRESS
Sahra Aden	115 Waltham Road
Soudos Jibril	115 Waltham Road
Ahmed Gaboric	132 Waltham Road N4 1RL
Tony Dondani	1 Waltham Rd.
Jesirehiforset	13 Pemberton Road
Grace MacIntosh	63 Rutland Gardens
Kirstian Kravulec	13 Pemberton Road
THISSA VEENIGAN DILYLI	17 PEMBERTON
Tu Gre	23 Pemberton Rd.
SIMON PASQUILL	25 PEMBERTON
Emma Corbett	25 PEMBERTON ROAD

Please send this petition to:

Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

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NAME	ADDRESS
V. Reason	33 Pemberton Rd. N4 1AX
P Ward	37 Pemberton Rd N4 1AX
P. WILLYS	45, PEMBERTON ROAD N4 1AX
R Cusack.	45 Pemberton N4 1AX
B King	47 Pemberton Rd N4 1AX
J. Wolberg	49 Pemberton Road N4 1AX
S Smyth	51 Pemberton Rd N4 1AX
D. FITZGERALD	51 Pemberton Rd N4 1AX
O SMITH	51 Pemberton Road N4 1AX
C CHAMBERS	55C Pemberton Rd.

Please send this petition to:

Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

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NAME	ADDRESS
Bruce Beata	33 Pemberton Rd
Gene Cereb	104 Pemberton Rd.
J. S.W.	Quee.
_____	112 Pemberton.
Jan Kelly	114 Pemberton Road.
M. McKee	118 Pemberton Rd
Dominic Hedder	118 Pemberton Rd
Shela Cronin	120 Pemberton Rd
Don Cronin	120 Pemberton Rd.
_____	" " "

Please send this petition to:
Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

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NAME	ADDRESS
Daryl Jones	97 Warham, N4
O. Odyssseos	105 Warham Rd N4.
R Rhodes	144 Warham Road
Liz + Mark Edwards	81 Warham Road, N4
Sho young-park	77 warham Road
S. Lemoviy	53 Warham Road
H-CHOU DHURY	39 WARHAM ROAD
C HEADS	51, WARHAM ROAD
M Tomlin	33, WARHAM RO
Sidme	12 Pemberton

Please send this petition to:

Ms D Barrett, Licensing Team, Civic Centre, High Rd, Wood Green, London, N22 8LE

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NAME	ADDRESS
Fanni Fazlas	74, Uuxefle Road, N4 1SA
Shefik Mehmet	455 Green Lanes N4 1HE
Stuart Cudge	117 Warham Rd N4 1AS
C Barnett	83 Warham Road N4
K. Suleymanli	59 Warham Rd.
I. Habis	57 Warham Rd.
M. Habis	57 Warham Rd.
David Habis	" " "
Asha Habis	" " "
LINCOLN THOMPSON TAITT	76 Warham Road.

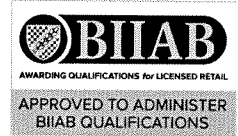
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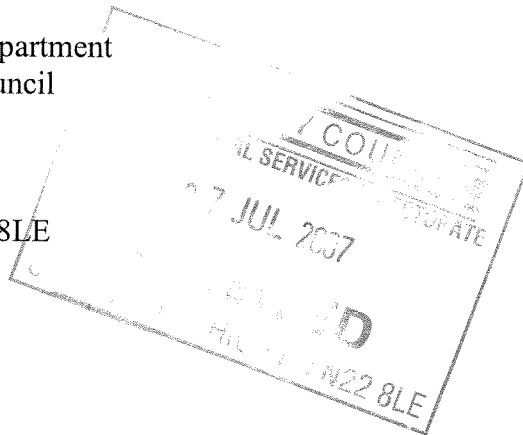
REPRESENTATIONS FROM THE TRADE.



GOSSCHALKS
SOLICITORS



Licensing Department
Haringey Council
Civic Centre
High Road
Wood Green
London N22 8LE



Our ref: RJT.BS.97000-593-6

Your ref:

Date: 26 July 2007

E-Mail: rjt@gosschalks.co.uk

Dear Sir

re: **Gambling Act 2005**
Application for a Betting Premises Licence by Metrobet Limited
Premises: Metrobet Limited, 507 Green Lanes, Haringey, London N4 1TB
Our client: William Hill Organization Limited

We act for William Hill Organization Limited who trade from premises at 519 Green Lane, N4 and 435 Green Lanes, N4. Our client has business interests, which may be affected, if this application were to be granted. As such, our client is entitled, in accordance with S.158 of the 2005 Act, to make representations in relation to this application.

The application premises are situated along a stretch of Green Lanes, which is already adequately served by five existing betting offices. In addition there is a further betting office application, refused by the Local Magistrates, pending an Appeal to be heard 20th August 2007. The addition of a further betting office would amount to an over proliferation of betting offices and gambling establishments within this vicinity.

An additional gambling facility in this already well-served area creates a risk to the licensing objectives. There is nothing in the 2005 Act, which requires that the level of risk be objectively quantified. The Licensing Authority is entitled to consider whether it is proper to draw an inference that such a risk would arise and to take a precautionary approach on the matter given the importance of the licensing objectives themselves and the relevant provision of the Gambling Commission guidance and Code of Practice issued to Licensing Authorities.

There is ample opportunity to gamble in this area and it is neither in the public interest nor in accordance with the licensing objectives for further high staking gambling opportunities to be offered.

Queens Gardens, Hull, HU1 3DZ T 01482 324252 F 01482 590290 E info@gosschalks.co.uk W www.gosschalks.co.uk DX 11902 - Hull

Partners- Simon Lunt, Bruce Raper, Bruce Wilkie, Ian Lanch, Richard Llewellyn, Anthony Clark, Neil Johnson, Clare Johnson, Richard Gooch, Christopher Burton, Roy Taylor, Robert Thomson, Jonathan Beharrell, Nigel Beckwith, Zoë Camichael, Nicholas Dean, Mark Teal, Stephen Walker, Andrew Mallory, Ian Brown, Robert Hastie, Richard Taylor, Andrew Johnson, Mark Day, Jonathan Peet, James Phinn, Justin Graves, Matthew Fletcher, John Coulson, Andrew Tarbutt, Ted Flanagan, Kate Groves, Craig Beetham

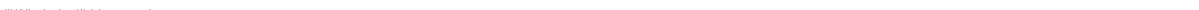
Associates - Ashlie Prescott, Steve Dillon, Chris Groves, Paul Plaxton, Victoria Quinn, Jonathan Hyldon, Nicola Barrass

Partnership Secretary – Martin Haldenby

Gosschalks are regulated by the Solicitors Regulation Authority.

We should be grateful if you would acknowledge receipt of this letter and contact us in order that we may advise you of our client's availability to attend the hearing.

Yours faithfully
GOSSCHALKS

A handwritten signature in dark ink, appearing to be 'Gosschalks', written over the typed name.

Licensing Unit
Commercial and Environmental Protection Group
Civic Centre
High Road
Wood Green
London, N22 8LE

Fax: 023 8033 7902

E-Mail: michael.messent@trethowans.com

Our Ref: MJM01/PM01/142002

Your Ref: Daliah Barrett



27 July 2007

Dear Sir

Metrobet - 507 Green Lanes, Haringey

We represent Ladbrokes Betting & Gaming Limited, who operate businesses in the vicinity of the application site at 10-12 Grand Parade, Green Lanes and 56 Grand Parade, Green Lanes.

Please accept this letter as representations made on behalf of our client in respect of the Application made by Metrobet in respect of the above address.

Ladbrokes are interested parties as defined by the Gambling Act Section 158 and your own Gambling Policy in that they have business interests which may be affected if the Application made by the Applicant is granted.

Representations are made in relation to the following licensing objectives:-

- (i) **Preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime.**

Ladbrokes and other major Bookmakers have security policies and procedures which seek to ensure that betting office premises are kept crime-free. Ladbrokes say that the addition of another Betting Office within the vicinity of their existing trading offices will significantly add to the problems of themselves and the other major Bookmaker Operators who are seeking to keep betting offices in the vicinity free of crime and disorder.

- (ii) **Ensuring that gambling is conducted in a fair and open way**

Currently and in the recent past, Metrobet have not always dealt with all their customers in a fair and equal way. Preferential betting terms have been made available to established and favoured customers, including the giving of "back shows". The availability of these shows is not always published and are not on offer to all customers.



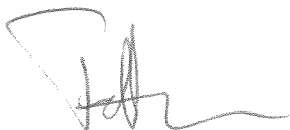
(iii) **Protecting children and other vulnerable persons from being harmed or exploited by gambling.**

- (a) Ladbrokes submit that an additional Betting Office in close proximity to the Ladbrokes Betting Offices at 10-12 Grand Parade and 56 Grand Parade, Green Lanes, together with the William Hill Betting Offices at 519 Green Lane and 435 Green Lanes and the Corals Betting Office at 559 Green Lanes, will give rise to such a concentration of Betting Offices in a comparatively small area that there will be a very much greater risk that the locality will become attractive to vulnerable persons. In addition, an application by Betting Shop Services Limited for an additional Betting Office Licence at 32-33 Grand Parade, Green Lanes, was refused by the local Betting Licensing Committee upon that basis that it would give rise to an unnecessary level of supply of Betting Offices and an unnecessary concentration of Betting Offices. Further, betting is a competitive business and in a highly competitive local market, Bookmakers are likely to feel it necessary to offer special concessions, bonuses and offers in an effort to attract a market share of a static or declining local betting market. Such offers might encourage vulnerable people to bet more than they should.
- (b) The number of gaming machines in individual Betting Offices is limited by law. The provision of a Metrobet Betting Office in Haringey will increase the number of gaming machines in the area and thereby add to the risk that vulnerable people will have additional opportunities to bet on such machines and to bet more than they should.
- (c) Young persons do congregate in this shopping area. The introduction of an additional Betting Office will give rise to still further concentration of gaming opportunities in a comparatively small geographical area, with the consequence that there will be a greater risk that it will become more attractive to young persons who may wish to attempt to gamble.

Representations are also made with regard to a procedural and jurisdictional issue, namely that a Licensing Authority shall not determine an Application for a Premises Licence until the relevant Operating Licence has been issued (Gambling Act 2005, Section 163(2)). It is believed that while the Applicant's Operating Licence Application has been lodged with the Gambling Commission, it has not yet been determined and accordingly this Application cannot be determined until the Operating Licence has been granted.

We should be glad if you will acknowledge receipt of this letter and inform us as soon as possible of the intended date, time and place at which your Authority proposes to consider and determine the application.

Yours faithfully

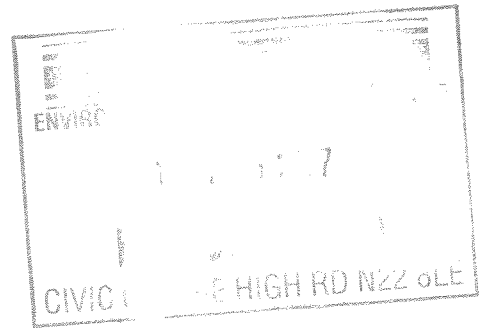
A handwritten signature in black ink, appearing to be 'JA', written over a faint rectangular stamp or box.

HARRIS HAGAN

Specialists in Gambling and Leisure Law

By Special Delivery

Licensing Department
London Borough of Haringey
Civic Centre
High Road
Wood Green
London N22 8LE



09 August 2007

Our ref: ES/ C0002/91

Dear Sir or Madam

Gambling Act 2005

Application for a Betting Premises Licence by Metrobet Limited
Premises: 507 Green Lanes, Haringay, London N4 1TB
Our Client: Coral Estates Limited

We act for Coral Estates Limited.

Our client operates licensed betting offices at 559 Green Lanes, Haringay and 297 St Anns Road, Haringay. Our client is, therefore, an interested party to the above application for a Betting Premises Licence under s.158 of the Gambling Act 2005 by reason of having business interests which may be affected by the grant of this application.

Our client opposes the grant of this application and makes the following representations:

1. The application site is situated in an area which is already adequately served by six betting offices, namely:
 - Coral, 559 Green Lanes (approximately 200 yards from the application site);
 - Ladbrokes, 10-12 Grand Parade, Green Lanes (approximately 25 yards from the application site);
 - Ladbrokes, 56/57 Green Lanes (approximately 325 yards from the application site);
 - William Hill, 519 Green Lanes (approximately 30 yards from the application site);

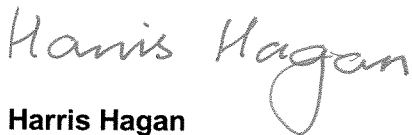
Harris Hagan
Solicitors

Antholin House, 71 Queen Street, London EC4N 4TL
Tel: +44 (0)20 7651 4040 Fax: +44 (0)20 7651 4049 email: info@harrishagan.com website: www.harrishagan.com
Partners: Julian Harris, John Hagan, Elizabeth Southorn
Consultant: David Stevens
Regulated by The Law Society

- William Hill, 435 Green Lanes (approximately 275 yards from the application site);
 - Coral, 297 St Anns Road (approximately 400 yards from the application site).
2. In addition, an application for a further betting office licence in Grand Parade, Green Lanes under the Betting Gaming and Lotteries Act 1963 was refused after careful consideration of detailed evidence at a hearing on 08 August 2006 before the Betting Licensing Committee of Haringey Magistrates' Court. This refusal is subject to an Appeal commencing on 20 August 2007.
 3. Granting an additional betting premises licence in this location would result in an overprovision of betting offices leading to a concentration of gambling premises in this locality. This would be inconsistent with the third licensing objection in s.1 of the Gambling Act 2005 which concerns itself with protecting children and other vulnerable persons from being harmed or exploited by gambling.
 4. Any other ground which may arise from the applicant's case at the hearing.

We should be grateful if you would acknowledge receipt of this letter and confirm when this matter will be listed for hearing.

Yours faithfully



Harris Hagan

REPRESENTATIONS FROM WARD COUNCILLORS.

Attn: Licensing team
Enforcement
Urban Environment
Civic Centre
High Road
Wood Green
N22 8LE

13th August, 2007

To whom it may concern,

Re: Application under Gambling Act 2005 for 507 Green Lanes

I am writing on behalf of myself and Councillor Karen Alexander, Liberal Democrat representatives for Harringay ward to oppose the above application. It is our view that that there is the potential for a betting shop in this location to adversely affect vulnerable young people and for it to lead to increased crime and disorder. A betting shop is likely to attract young, unemployed people of which there are very many in the location as well as other clients. I consider this group of people to be vulnerable as they are looking to improve their lives financially while at the same time being ill able to afford to waste money on gambling. The potential loss of income could be extremely detrimental to this group of people.

There is also the potential that an individual with little disposable income who becomes addicted to gambling could get involved in criminal activity in order to fund a habit. This could potentially have a detrimental affect on surrounding businesses. I would argue therefore that this isn't really a suitable location for this type of establishment.

Yours sincerely,
Cllr Carolyn Baker
Liberal Democrat Representative, Harringay Ward

Members Room
River Park House
225 High Road, Wood Green
London, N22 8HQ

6 August 2007

Dear Sir / Madam

Metrobet - 507 Green Lanes, Haringey

I am writing to you as Chair of the Green Lanes Strategy Group to formally object to the application submitted for 507 Green Lanes N4 - Metrobet Ltd as a gambling establishment.

The Green Lanes Strategy Group is a formal constituted consultative body of the Council whose membership consists of ward Councillors, local community representatives, the Haringay Traders Association, the Metropolitan Police and Council Officers. At its meeting on 26 July the Group expressed their concern regarding the recent application for the above premises.

The Green Lanes Strategy Group felt that the location of these premises is directly opposite Haringay's main post office which is one of the main focuses for the local community and is around the corner from the South Haringay Primary School and is in close proximity to a number of other schools, key community buildings, faith establishments and is in a residential area.

In view of this, The Green Lanes Strategy Group would like to make the following representations in relation to the following licensing objectives:-

(i) Preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime.

The increase in the number of such establishments of which there are already an excessive number along this stretch of Green Lanes would increase the risk of them being associated with crime and disorder making it much more difficult to control.

(ii) Ensuring that gambling is conducted in a fair and open way

There are no safeguards identified to ensure that this is adhered to and again the increase in the number of such establishments will make it more difficult to monitor.

(iii) Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The close proximity of these premises to three schools, a number of community centres and faith establishments in an area that is predominately residential which encourages and brings in a number of young and vulnerable people into this very highly concentrated shopping area would further increase the risk to these groups.

Yours faithfully

Cllr Nilgun Canver
Chair, Green Lanes Strategy Group

APP 4

RESPONSE TO TRADE
REPRESENTATIONS FROM
APPLICANT

metrobet

Daliah Barrett-Williams
Lead Licensing Officer
Licensing Team
2nd Floor
High Road
Wood Green
London
N222 8LE

Metrobet Limited
260 Seven Sisters Road
Finsbury Park
London
N4 2JA
August 17, 2007



Dear Ms Williams

Objections - 507 Green Lanes, Haringey

I write to update you on our proposed course of action with regard to the objections you have received in relation to the above premises.

We have prepared a comprehensive response in relation to the trade objectors, William Hill, Ladbroke and Coral. This is currently with our lawyers for review.


In essence, we will argue that none of these companies have business interests, other than by way of competition, which could be affected by the new site. As the Act and subsequent guidance makes it clear that mere competition is not a ground for objection, we argue that the Authority is entitled to reject their representations as inadmissible.

We further argue that if the representations are admissible, each of their representations should be rejected as vexatious, frivolous and irrelevant as no evidence is produced to support them, they are not supported by objections by any of the relevant authorities to whom notice was served, and it is clear that the objectors believe that their existing 5 shops are run without threat to the licensing objectives. To argue that a sixth shop, without evidence or support from competent authorities such as the police, run using the same standards of care, would add significantly to risk, is simply not credible.

We are reviewing the latest objections, which again are presented without evidence. We will produce an aggregated response to these for review by our lawyers.

I expect that the review should be complete over the course of the next two weeks so that we can submit to you our comprehensive response to the objections.

Yours sincerely


Nigel Smith
CEO

APP 4A

WITHDRAWAL LETTER FROM
LADBROKES

TRETHOWANS

The Director General's House
Rockstone Place
Southampton
SO15 2EP
DX: 154120 SOUTHAMPTON 48
Tel: 023 8032 1000
www.trethowans.com

Licensing Unit
Commercial and Environmental Protection Group
Civic Centre
High Road
Wood Green
London, N22 8LE

Fax: 023 8033 7902
E-Mail: michael.messent@trethowans.com
Our Ref: MJM01/MJD01/142002
Your Ref: Daliah Barrett

14 September 2007

Dear Sir

Metrobet - 507 Green Lanes, Haringey

As you know we act for Ladbrokes.

Please accept this letter as sufficient notice that we have been instructed to withdraw our client's representations.

We regret any time which may have been spent by you and your other Officers as a consequence of these representations having been lodged, but at least your Committee will be spared the task of considering them, and we trust that this will save time.

No doubt you will advise the applicant in due course.

Yours faithfully

