

**Public Health Objection to Planning Application – 144 High Road, London, N22 6EB
(HGY/2022/4454)**

Change of use from Betting Shop (sui generis) to Adult Gaming Centre (sui generis)

Health in All Policies Team, Public Health

13th March 2023

Summary

The Public Health team object to a planning application for an adult gaming centre at Wood Green High Road for hours of operation 24 hours. This proposal is at a vulnerable location with multiple gambling premises in the local area. The over-concentration of 24-hour gambling premises has a negative impact on the health and wellbeing of our residents and does not align with the Local Policy DM 42 of the Haringey Development Management DPD. Furthermore, Noel Park ward is ranked high in all risks associated with gambling-related harm and the vulnerable groups highlighted in this report suggests a strong need to safeguard the area from over-concentration of 24-hour operation gambling premises. We want to help promote a healthy high street and retain a vibrant mix of uses in the town centre.

Comments on Noise Assessment Report

The noise report submitted by the applicant does not provide sufficient assessment to ensure the noise levels will not transfer to the properties adjacent and above the premises.

Furthermore, the report makes comparisons with Wardour Street, W1, and Broadway, Crawley. These readings are not relevant as the two areas used for comparison are geographically different with distinct characteristics and vulnerabilities as well as different buildings. The health impacts of disrupted sleep and sleep deprivation are well researched¹ - our residents deserve to be able to sleep well.

Location

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

Three AGCs clustered on Wood Green High Road:

- **Admiral Casino: Wood Green**, 117 High Road, Wood Green, London, N22 6BB (1 min walk) – open 24 hours

¹How does sleep relate to mental health? Mind (2020). Last accessed [online](#) March 2023.

- **Admiral Casino: Turnpike Lane, 9 High Road, Wood Green, London, N22 6BH** (0.2 mile, 4 min walk) – open 24 hours
- **Game Nation, 49 High Road, Wood Green, London, N22 6BH** (0.1 mile, 2 min walk) – open 24 hours

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

- **Ladbrokes, 742 Lordship Lane N22 5JP**
- **Paddy Power, 3a Hollywood Green, High Road N22 6EJ**
- **Ladbrokes, 12 The Broadway, High Road, N22 6DS**
- **William Hill, 9 The Broadway, High Road N22 6DS**
- **Merkur Cashino, 91 High Road, Wood Green, London, N22 6BB – open 24 hours**
- **Betfred, 64 High Road, Wood Green, London, N22 6DH** (1 min walk)
- **Paddy Power, 33 High Road N22 6BH**
- **Ladbrokes, 13 High Road N22 6BH**
- **Betfred, 679a Green Lanes, N22 0QY**

Figure 1 highlights a high number of gambling premises from Wood Green High Road to West Green Road. The Public Health team do not see how another gambling premises could add to the vitality and viability of the high street. Furthermore, this is not in line with Local Policy DM 42 of the Haringey Development Management DPD

“Within Secondary Shopping Frontages, the Council will give consideration to proposals for community facilities where it can be demonstrated that the use will: Not result in an overconcentration of similar community uses where this would detract from the diversity of uses in the centre.”

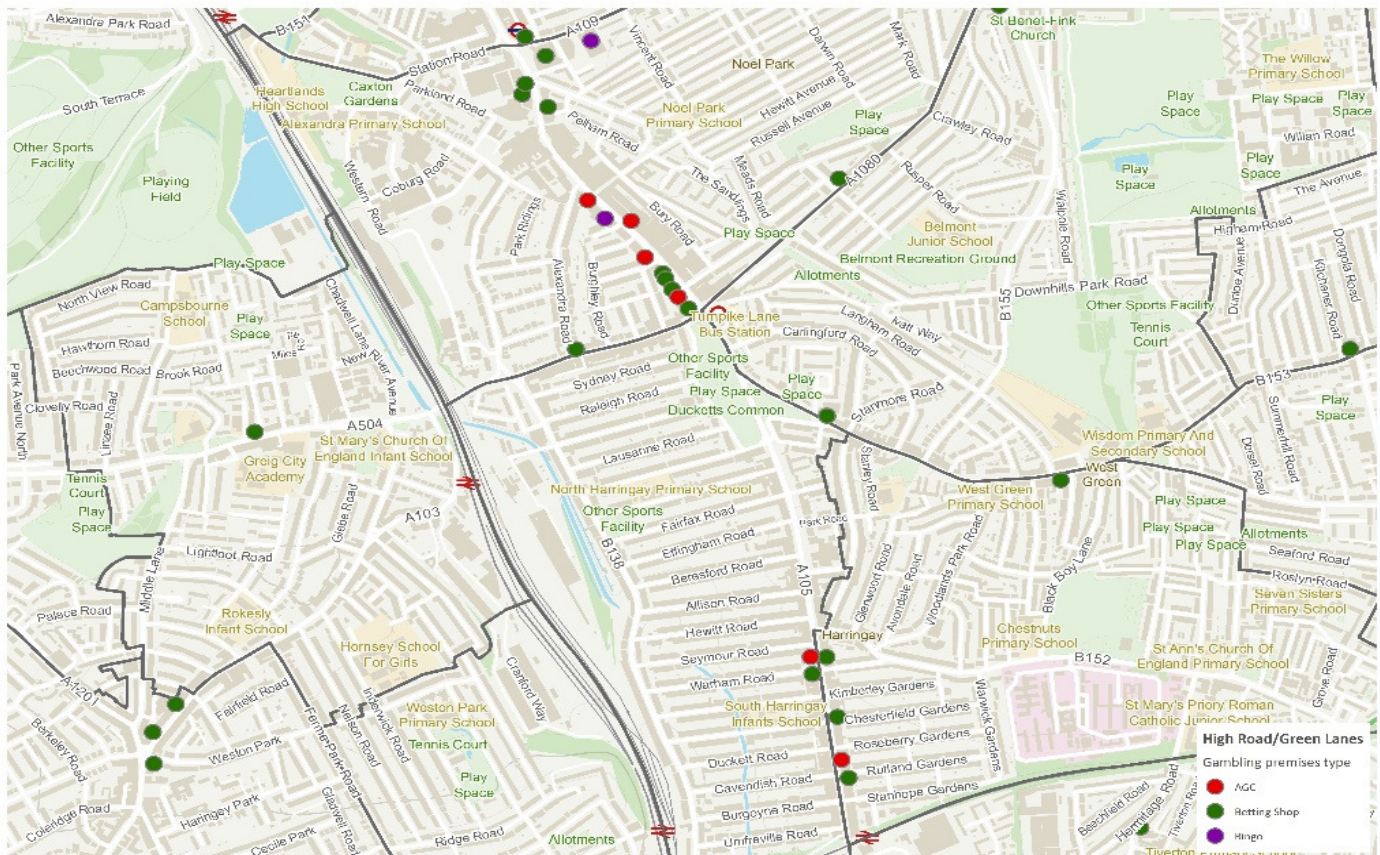


Figure 1. Map of gambling premises on High Road and Green Lanes the area of the borough with the highest concentration.

Estimated fiscal cost of gambling harm to Haringey

The Public Health team have estimated the annual cost of gambling harm to be between £1,345,055 and £1,649,311 (2019-2020) by extrapolating the annual cost in England of £127 billion (Public Health England, Gambling- Related Harms Review 2021). This includes costs to primary health care, homelessness, unemployment, and the criminal justice system. Although, this is not a direct cost and it is not easily measurable, we are able to use the factors affecting a problem gambler as a co-morbidity to estimate the associated costs.

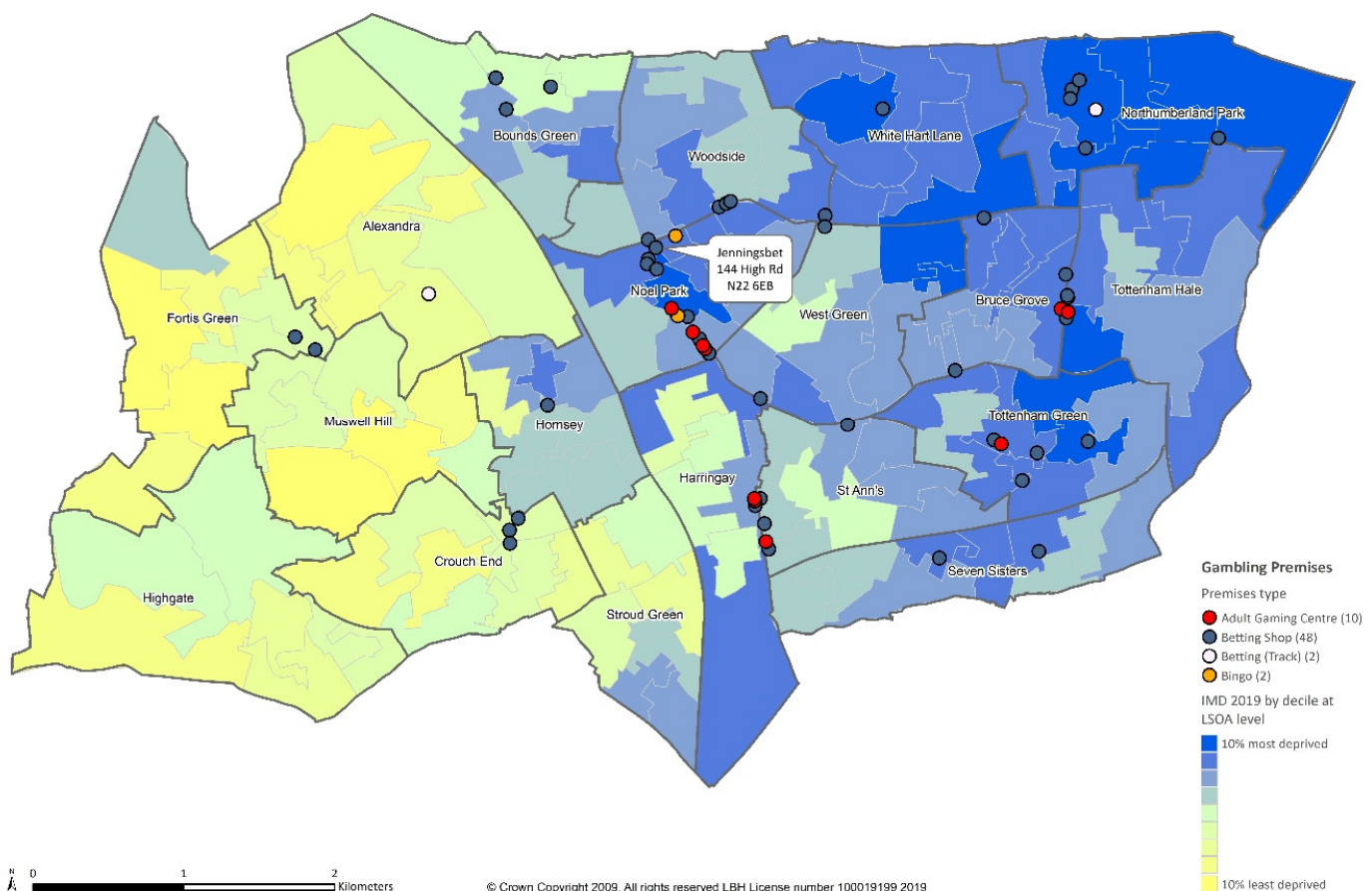


Figure 2. Map of the location of gambling premises in Haringey, 2023.

From figure 2 you can see Haringey currently has 48 betting shops, ten adult gaming centres, two Bingo premises and two track betting premises (2023). Gambling is a pressing health inequalities issue. More deprived wards have higher number of betting shops, adult gaming centres and bingo and this is linked to deprivation levels.

The Noel Park ward area is one of the most deprived areas in London, data from the Census 2021 shows that 60.7% of households are experiencing at least one dimension of deprivation in Noel Park². The Public Health team believe the proposal of another 24-hour adult gaming centre will make matters worse for the residents in terms of health and

² Household deprivation: Census 2021. ONS (2023). Last accessed [online](#) March 2023.

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

The Noel Park Ward ranks high in all risk factors associated with gambling-related harm in individuals such as a ward with high deprivation indices, increased number of residents on Universal Credit, high numbers of people who are rough sleeping, high percentage of residents from a minority ethnic background, families from very low median household income, high unemployment rates, high level of long-term health conditions and disability (which may include mental health issues).

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

Table 1. Gambling premises (betting shops, adult gaming centres, bingo only) per 10,000 of population in Haringey (2021).

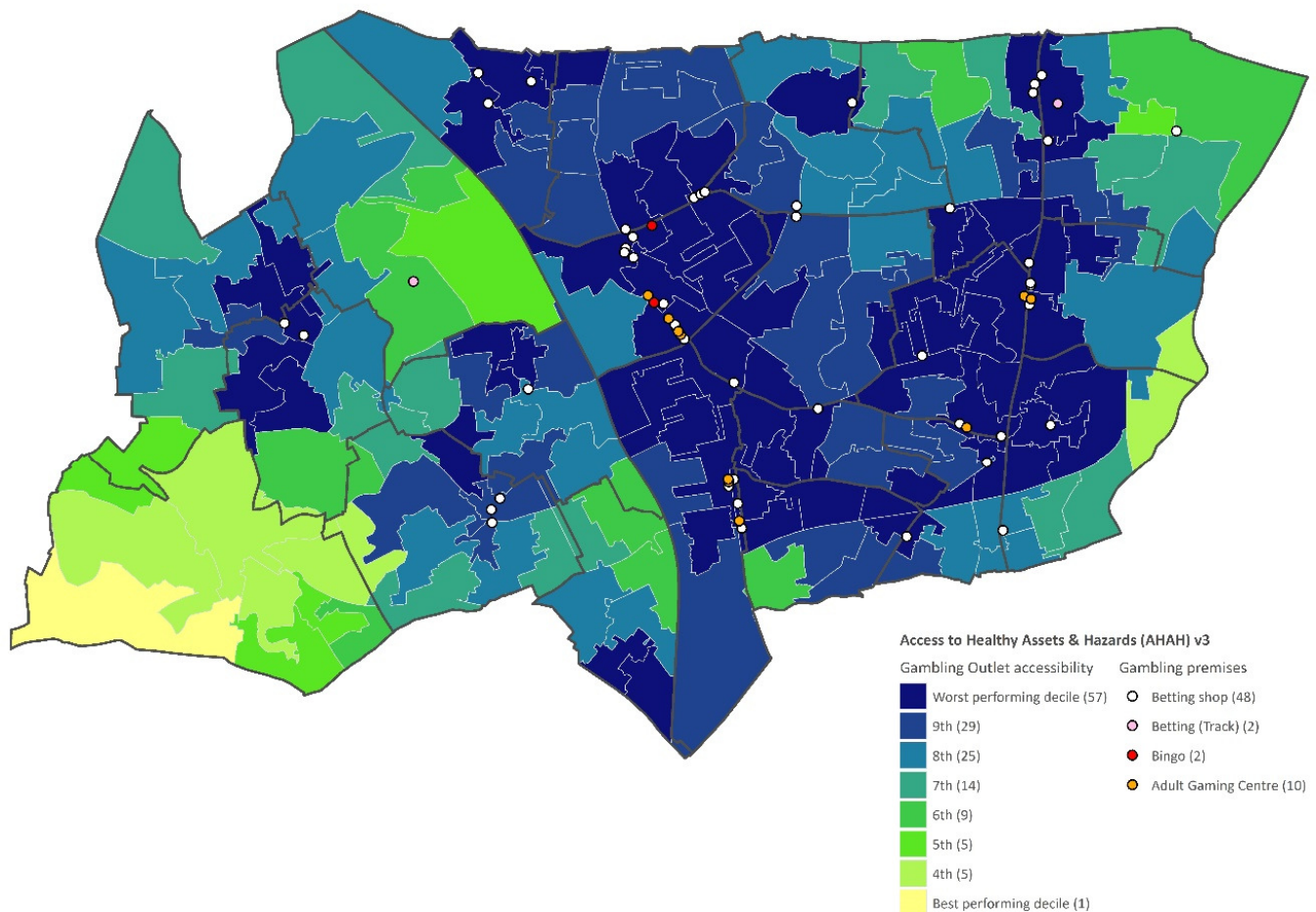
Ward	Ward population	Number of gambling premises	Premises per 10,000
Alexandra	11,758	1	0.9
Bounds Green	14,998	3	2
Bruce Grove	14,820	5	3.3
Crouch End	12,315	2	1.6
Fortis Green	6,341	2	3.1
Harringay	14,243	3	2.1
Highgate	10,713	0	0
Hornsey	13,003	2	1.5
Muswell Hill	10,636	0	0
Noel Park	12,787	14	10.9
Northumberland Park	9,224	6	6.5
Seven Sisters	17,744	3	1.6
St. Ann's	14,434	5	3.5
Stroud Green	11,568	0	0
Tottenham Green	16,516	4	2.4
Tottenham Hale	10,250	5	4.9
West Green	9,652	3	3.1
White Hart Lane	7,882	1	1.3
Woodside	10,724	5	4.7
Total:	229,608	64	2.8

³ According to the gambling commission there were 10,590 betting shops and bingo halls in the UK in March 2018, and according to population estimates by ONS the UK population in 2017 was 66.05 million; this gives a betting shop/bingo hall per 10,000 people of 1.6

Economic Growth

We believe the economic gain of employing eight staff members does not outweigh the financial losses residents face within the premises, and the wider health and cost implications this can have. Figure 3 demonstrates the negative impact gambling can have on high streets in Haringey.

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



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

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

Problem Gambling and Vulnerable Groups

We must recognise that gambling does not place the onus on individual responsibility, but instead it can be a health harming activity to anyone because of the addictive nature of products, their ease of access, and the way they are promoted.

There is strong research which gives a clearer picture of those who are likely to be more vulnerable to gambling harm⁴. Amongst the groups, where the evidence base for vulnerability is strongest, include those with a history of mental ill-health, substance abuse or gambling addiction; people with learning disabilities/difficulties; immigrants; homeless people; the unemployed or those on low income. This could include area-based vulnerability, such as demographics and areas of deprivation⁵.

Mental Health

Haringey has one of the highest levels of mental health illnesses in London. 29 per 1,000 living in Haringey are on Employment and Support Allowance (ESA) claimants for mental and behavioural disorders. This is higher than the London (22.5 per 1,000) and England (27.3 per 1,000) averages (PHE, 2019).

The estimated prevalence of common mental disorders in Haringey for ages 16 and over is 22.3%, which is higher than London (19.3%) and England (16.9%)(PHE, 2017).

Access to gambling venues increases gambling activity and problem gambling. Problem and pathological gambling is linked to poor health, low level and severe mental health problems and a co-dependence on alcohol.

People Rough Sleeping

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

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

Another research reinforces the assertion that problem gambling is a significant issue within the homeless population and is more commonly a cause than a consequence of homelessness (Sharman, Dreyer & Clark 2012⁷).

⁴ Guidance to licensing authorities. Gambling Commission (2021). Last accessed [online](#) March 2023.

⁵ A 'Whole Council' Approach to Gambling. London Councils. London Councils, 2018. Last accessed [online](#) March 2023.

⁶ Homelessness and gambling: a complex relationship. Sharman, S. et al., (2016). Last accessed [online](#) March 2023.

⁷ Rates of problematic gambling in a British homeless sample: a preliminary study. Sharman, S., et al. (2015) Last accessed [online](#) March 2023.

Figure 4 below shows the number of people seen rough sleeping by outreach teams. The number of bedded down street contacts is recorded in each Lower Super Output Area within the borough during 2021/22. The map highlights the greater concentration of those rough sleeping to be in the LSOA in which the premises is located, along the Wood Green High Road (yellow circle). There was a total of 268 people rough sleeping in 2021/22.

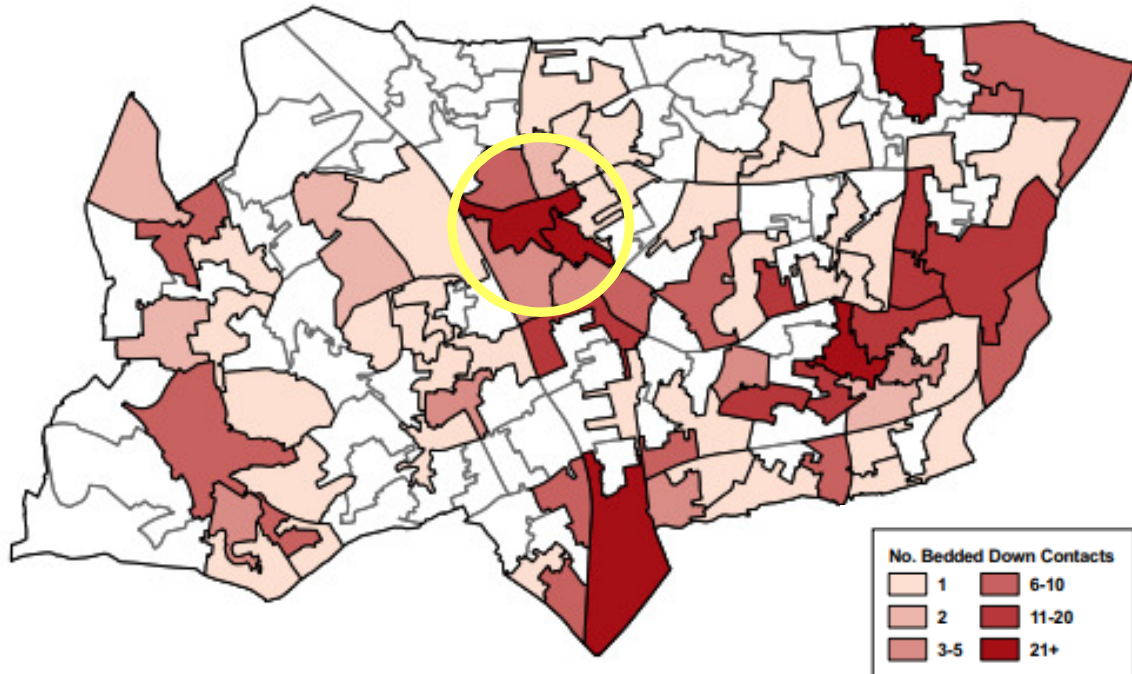


Figure 4. Number of people seen rough sleeping by outreach teams in Haringey, 2021/22.

Substance Abuse

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

Unemployment or Low Income Groups

An increase in gambling outlets densely populated in the ward may cause gambling addiction which can fuel lack of money for families in this ward.

Noel Park ward has the highest levels of employment deprivation in the borough shown in Figure 5. 10% of Noel Park residents are unemployed. This is above both the Haringey (8.6%) and London (7.3%) averages. In Noel Park, there are 288.7 per 10,000 residents who claim benefit principally for the reason of being unemployed. This is above both the

⁸ Excessive gambling and substance abuse: is there a relationship? Griffiths, M. et al. (2009). Last accessed [online](#) March 2023.

Haringey and London levels (251.8 per 10,000 residents and 201.7 per 10,000 residents respectively). The rate of claimants in Haringey is almost 25% higher than the London rate.

During COVID, Haringey experienced the largest increase in unemployment claimant for benefits among the 11 Central London Boroughs and has now become the 6th highest in the UK. Of those who were in work in February 6% (660 households) had lost their job by May 2019. Tottenham Hale and Noel Park wards were particularly badly hit, relative to the working age population of those wards. This had become worse during COVID.

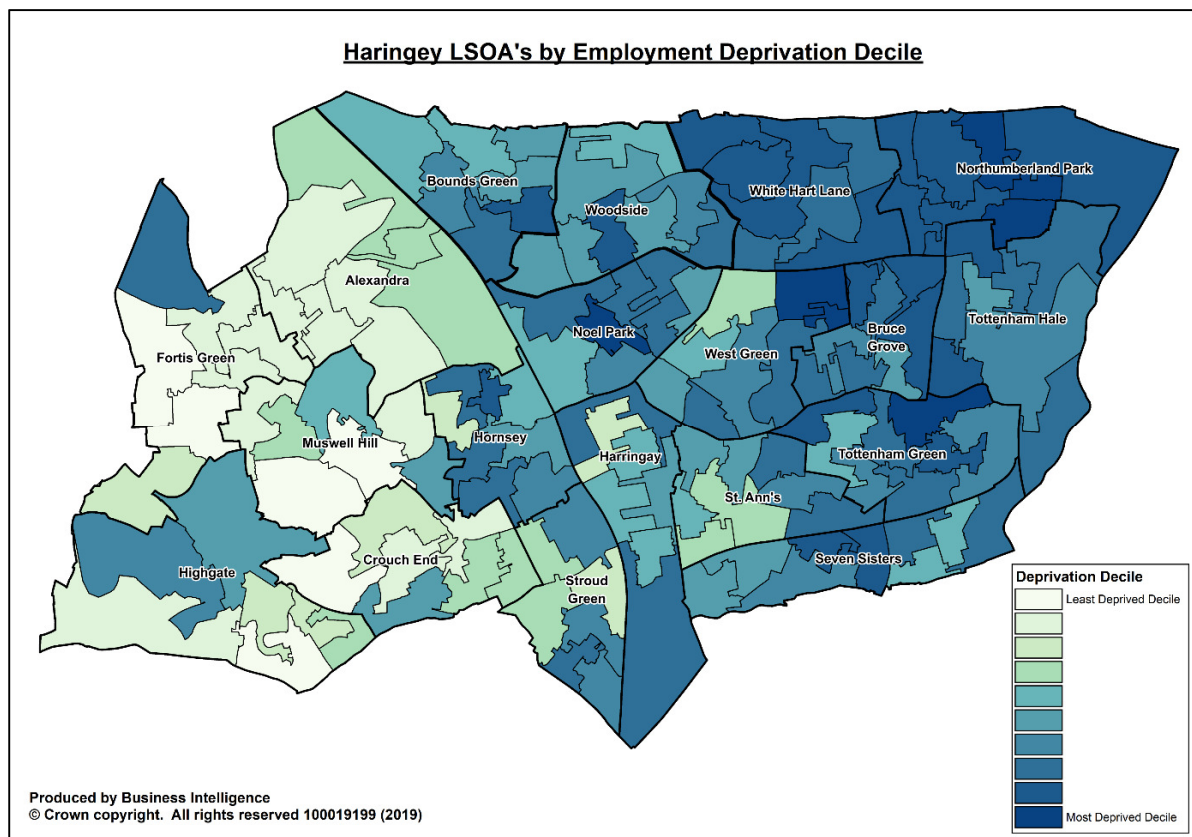


Figure 5. Pre-COVID employment deprivation in Haringey, 2019.

Problem Gambling and Location of Gambling Premises

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

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

Much of the focus on gambling-related crime tends to be upon problem gamblers. Criminal behaviour is most commonly associated with problem gamblers as problem gamblers spend more than their disposable income and often have to resort to criminal activity as a way of getting money to carry on gambling and repay associated debt problems⁹.

⁹ Betting shops and crime: is there a relationship? Griffiths, M. (2011). Last accessed [online](#) March 2023.

Haringey's crime rate is 122.7 per 1,000 population, compared to 109.2 for London. This is 12% above the London average. Noel Park is the 19th highest volume crime ward in London, of the 669 total wards¹⁰.

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

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

Primary Schools

- Noel Park Primary School (0.231 miles)
- Alexandra Primary School (0.288 miles)
- St Paul's Catholic Primary School (0.305 miles)
- St Michael's CE Primary School (N22) (0.335 miles)
- Trinity Primary Academy (0.369 miles)

Secondary schools

- Heartlands High School (0.457 miles)

Wood Green has good extensive transport links such as bus stops and tube stations (Wood Green and Turnpike Lane), which is used by young people and other vulnerable people. We are seeing an increase in gambling premises located close to transport hubs. Children and young people passing the concentration of gambling businesses normalises the harmful culture of gambling amongst children and vulnerable groups.

As part of the [School Superzone project](#) the Public Health team conducted focus groups with children and parents between late 2019 and February 2020., During the focus groups parents commented on the large volume of gambling shops in close proximity to each other and one parent expressed concern about the influence this would have on children and their development, with concerns raised about the possibility of enabling gambling addictions in the future.

Research suggests that “for every problem gambler there are on average between 6 to 10 additional people who are directly affected”. These are often the friends, family and colleagues of that person. In late 2022, the Public Health team conducted a series of focus groups to help shape our Gambling Harms Reduction Programme. The team heard accounts on the effects of gambling from residents who sited Wood Green and Tottenham High Road as the specific areas of concern. As a result, we have developed support and treatment pathways and clinics. One of the clinics is situated in Wood Green and is already seeing our residents face-to-face. The change to a 24-hour AGC will be undermining the new programme of work we are developing to combat harmful gambling. Regarding London Plan SD6 the policy states “...*strengthening the role of town centres as a main focus for Londoners’ sense of place and local identity*”, and certainly the participating residents engaging in the focus groups did not believe the gambling premises achieved

¹⁰ MPS Stats and Data. Last accessed [online](#).

this and expressed very strongly how disappointed they were to see the number of gambling premises on the high street increasing.

Linking with the Borough Plan Priorities

"A Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential".

The location of the proposed premises targets the poorer communities and it becomes harder for the health inequalities gap to close. If the planning application is to be granted it will not align with the [Borough Plan](#) to reduce health inequalities, create healthy spaces and neighbourhoods for children and give children the best start in life. It will not demonstrate our preventative efforts to support families and enhance mental wellbeing.

Conclusion

Given the evidence the Public Health team have presented, we do not believe the applicant is able to mitigate the harms sufficiently due to the nature of their business and the already oversaturated gambling premises within the area. Opening a 24-hour AGC has the potential to have a detrimental impact on the health and wellbeing of Haringey residents.

We must seek to address the needs of our local community and ensure the voice of our residents are considered in planning, particularly, if residents highlight that a new proposal may negatively impact their wellbeing or harm their local community.