

LADDER COMMUNITY SAFETY PARTNERSHIP

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Planning, Regeneration and Economy
Haringey Council
River Park House
225 High Road
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London N22 8HQ

11 September 2023

Dear Ms Whittredge

HGY/2023/2242: 513 Green Lanes N4 1AN: variation to extend the daily opening hours of operation from 23.00 to 02.00

1. Introduction

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

Our members, particularly those who live in flats along Green Lanes and at the eastern end of adjacent Ladder roads, are very concerned at the prospect of an AGC opening until 2am, 7 days a week on Green Lanes. We believe that in the specific context of the local area, granting permission for a late night gambling outlet in Green Lanes Haringay would be against several key policies in Haringey's Local Plan.

2. Loss of Amenity

Policy DM1 lays down clear requirements for new developments. In particular it expects sensitivity to the local neighbourhood and the avoidance of "*harmful impacts, especially to the amenity of neighbouring buildings New development should enhance the quality of life of those living and working in the borough*" (Para 2.1). It is very hard to see how a late night gambling outlet will enhance anyone's quality of life, but correspondingly easy to envisage the problems which it will cause. The applicants claim to have shown, via a Noise Assessment Report, dating from 2020, that there will be no predicted noise impact. Local residents take a less positive view. Given the very low ambient noise levels in the early hours of the morning (when no other gambling venues are open in the area) even a small number of

people coming and going creates an erratic, disturbing noise which can have a major negative impact. It is well known, and generally accepted, that unpredictable bursts of noise are far more disruptive to sleep and relaxation, and at a time of night -2am – when residents should have a reasonable expectation of undisturbed sleep.

It should also be remembered that (unlike many high streets) this area is very densely occupied, with 2 or 3 storeys of flats above, adjacent to and opposite the AGC site, with yet more houses and flats in nearby residential roads on both sides of Green Lanes.

We accept that a number of restaurants (almost all to the south of the AGC site) have permitted opening hours until 2am, but it is a fact that those hours are simply permissive, and not normally used on a daily basis. It is simply a convenience for those venues to be able to open after 11pm at weekends or Bank Holidays. For much of the working week they are closed well before 2am. It should also be noted that they are restaurants, not gambling outlets, which is a very different proposition, as recognised by Planning itself, which allocates totally different use classes – E and Sui Generis, respectively.

This leads us on to the status of Green Lanes as a District Town Centre (Policy SP10). This specifically identifies Wood Green as an appropriate venue for *night* time economy development, while Green Lanes is to be strengthened as a shopping and service centre with an *evening* economy (my italics). This is clear guidance in support of the existing AGC closing time of 11pm.

Furthermore, the new London Plan (2021) both supports and underpins this approach, stating that *‘Over-concentrations of some uses however, such as betting shops, pawnbrokers, pay-day loan stores, amusement centres and hot food takeaways, can give rise to particular concerns regarding the impact on mental and physical health and wellbeing, amenity, vitality, viability and diversity. The proliferation and concentration of these uses should be carefully managed through Development Plans and planning decisions ...’* (Ch6, Para 6.9.5)

We are therefore asking LBH Planning to do just that – use its existing Development Plan policies and previous planning decisions about AGCs in Green Lanes, to prevent the harm which would be caused by the proposed opening hours, until 2am, 7 days a week.

It would also be sensible to note that none of the other gambling outlets in Green Lanes have been allowed hours later than 11pm. There have been repeated attempts by the AGC at 48 Grand Parade to extend their hours to 24/7, but all have been refused by LBH (4 times) and on appeal (twice). If the 2am closing time requested here, at 513 Green Lanes, were to be granted, it would be impossible to resist the inevitable and identical applications from the other AGCs in Green Lanes, which would follow. Moreover, if they are successful now, it is more than likely that the current applicants will be back again, next time with a 24/7 request. It is therefore vital that the current hours are respected and maintained, as a ‘line in the sand’.

3. Clustering of Betting / Gambling Outlets

There is already an overconcentration of such outlets in this part of Green Lanes. In addition to the AGC in this application, at 513 Green Lanes, there is another at 519 Green Lanes, plus two betting shops at 507 Green Lanes and opposite at 12 Grand Parade - not to mention further betting shops and another AGC a few minutes’ walk away at 48 Grand Parade. By any sensible definition this represents a saturation of this particular type of use (see policy DM46) which would, of course, be further intensified if longer hours were to be granted. Too many gambling outlets, open for longer hours, can clearly have a negative impact on a town

centre's vitality and viability, not to mention community safety, health and well-being. As stated in DM46, these are valid issues for a Local Plan to take into consideration. In this context, it should also be noted that LBH's Statement of Gambling Policy (2022-25) identifies Harringay Ward – in which all of the above outlets are located – as an Area of Vulnerability, ie where people are most at risk of gambling-related harm. This risk would only be exacerbated by the granting of longer hours and with it more opportunity to gamble.

4. Crime and Disorder

The applicants clearly recognise that this is potentially, if not actually, a serious problem. Their Planning Statement lists (paras 5.4-5.7, App3) all of the preventative and risk assessment measures which they find it necessary to implement, thereby highlighting the wide range of social problems and harm which are associated with gambling and AGCs.

As they are not embedded in, or part of, the local community, the applicants are probably unaware of the previous history of Green Lanes, which was extremely troubled. Thanks to the outstanding work over many years of the Green Lanes Strategy Group (GLSG) our local high street is now a much safer place. This did not happen by accident. One of the principal issues which the GLSG had to confront was the high level of crime and ASB associated with a night time economy. A key priority of the Group was to put an end to the notoriety of Green Lanes as a late night venue, which attracted entirely the wrong sort of people into the area and encouraged crime.

As stated in policy SP11, a priority of any new development should be *“to reduce crime and the fear of crime”*. Allowing a late night gambling outlet does not seem the most obvious way of achieving that objective, especially given the history of the area.

6. Conclusion

The local community is overwhelmingly opposed to this application which was discussed, and vociferously opposed at a well-attended LCSP meeting on 7 Sept. We believe that it is contrary to numerous LBH planning policies including SP10, SP11, DM1, DM46 and the London Plan (Ch6, 6.9.5). We therefore urge refusal of permission for this application.

Ian Sygrave

Chair, LCSP

Chair, Harringay Police Panel