

Public Health Objection to Planning Application – 513 Green Lanes Hornsey London N4
1AN (HGY/2023/2242)

Health in All Policies Team, Public Health

4th September 2023

Proposal

Variation of condition 3 (hours of operation) of planning permission ref. HGY/2021/0066 for: Change of use of the ground floor of 513 Green Lanes, from a Licensed Betting Office (Sui Generis) to an Adult Gaming Centre (Sui Generis) operating from 09:00 am to 23:00 pm seven days per week; namely, to extend the hours of operation until 2:00 am.

Summary

The Public Health team object to a planning application for an adult gaming centre at Green Lanes for variation of operating hours past midnight. This proposal is at a vulnerable location with multiple gambling premises in the local area. The over-concentration of late-night 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, Haringay 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 late-night operation gambling premises. We want to help promote a healthy high street and retain a vibrant mix of uses in the town centre. We have also reviewed the planning statement and we are not convinced the noise assessment and customer demographics and profile is accurate and reliable.

Comments on Planning Statement

1. Appendix 5 Survey Data of Visitor Numbers – the number of visitors is not specific to 513 Green Lanes. The tables show an average number of visitors in a large geographical location i.e. North West, London and the South East. This is not relevant as the two areas are geographically different with distinct characteristics and vulnerabilities as well as different buildings. Similarly, 5.17 (page 10), the representative data taken from other Admiral AGCs is not an accurate assessment.
2. 5.9 (Page 9) – the demographic of customers based on experience and anecdotal evidence indicates *“many visitors over night-time hours are those working shifts or anti-social hours and those working within the hospitality industry. These often include chefs, waiters, bar workers, taxi and delivery drivers.”*
3. The demographic of customers highlighted within the planning statement suggests these individuals are particularly vulnerable to gambling harms. The hospitality sector was one of the largest users of the Coronavirus Job Retention Scheme (CJRS or furlough scheme). The hospitality industry has higher proportions of

younger workers, foreign-born workers, part-time workers and workers from minority ethnic backgrounds compared to other sectors. Median hourly pay is lower in hospitality compared to other sectors.¹

4. 5.16 (Page 10) - *“A noise survey was carried out on 8 July 2020 between 01:00 and 03:00 to represent typical night-time conditions and between 13:00 and 15:00 to represent typical daytime conditions.”*

The methodology used in the noise assessment appears to be inappropriate for accurately capturing the noise assessment. The survey took place on 8th July 2020, when lockdown restrictions had started to ease and businesses were permitted to reopen on 4th July, the government recommended people avoid gatherings of larger than six. This compromises the accuracy and reliability of the obtained data, and the timing of the assessment was inadequate as most people stayed home and number of cars on the road were impacted.

5. 6.6 (Page 12) – reference is required to support the evidence of visitor profile.

Location

The Public Health team has evaluated the area of which the premises is located. This proposal is at a vulnerable location with two adult gaming centres (AGCs) all within a 2-minute walk. There are a further four 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, Haringay ward is ranked high in all risks associated with gambling-related harm (e.g. poverty, unemployment, mental health) and the vulnerable groups highlighted in this report suggests a strong need to safeguard the area from over-concentration of gambling premises and to help promote a healthy high street and retain a vibrant mix of uses in the town centre.

Two AGCs clustered on Green Lanes in proximity to the proposed premises:

- **Golden Slots**, 48 Grand Parade, Tottenham, London, N4 1AG (0.1 miles, 2 mins walk)
- **AGC**, 519 Green Lanes, Tottenham, London, N4 1AG (less than 1 min walk)

There are four other gambling premises on Green Lanes within 5 minute walk to Admiral, 513 Green Lanes:

- **Jennings Bet**, 32-33 Grand Parade, Green Lanes, London, N4 1LG (0.1 miles, 3 min walk)
- **Ladbrokes**, 56-57 Grand Parade, Tottenham, London, N4 1AF (0.2 miles, 5 min walk)
- **Metrobet Bookmakers**, 507 Green Lanes, Hornsey, London, N4 1AL (less than 1 min walk)

¹ <https://commonslibrary.parliament.uk/research-briefings/cbp-9111/>

- Ladbrokes (Temporary closed), 12 Grand Parade, Green Lanes, London N4 1LG

Figure 1 highlights a high number of gambling premises from Wood Green High Road to Green Lanes. 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.”

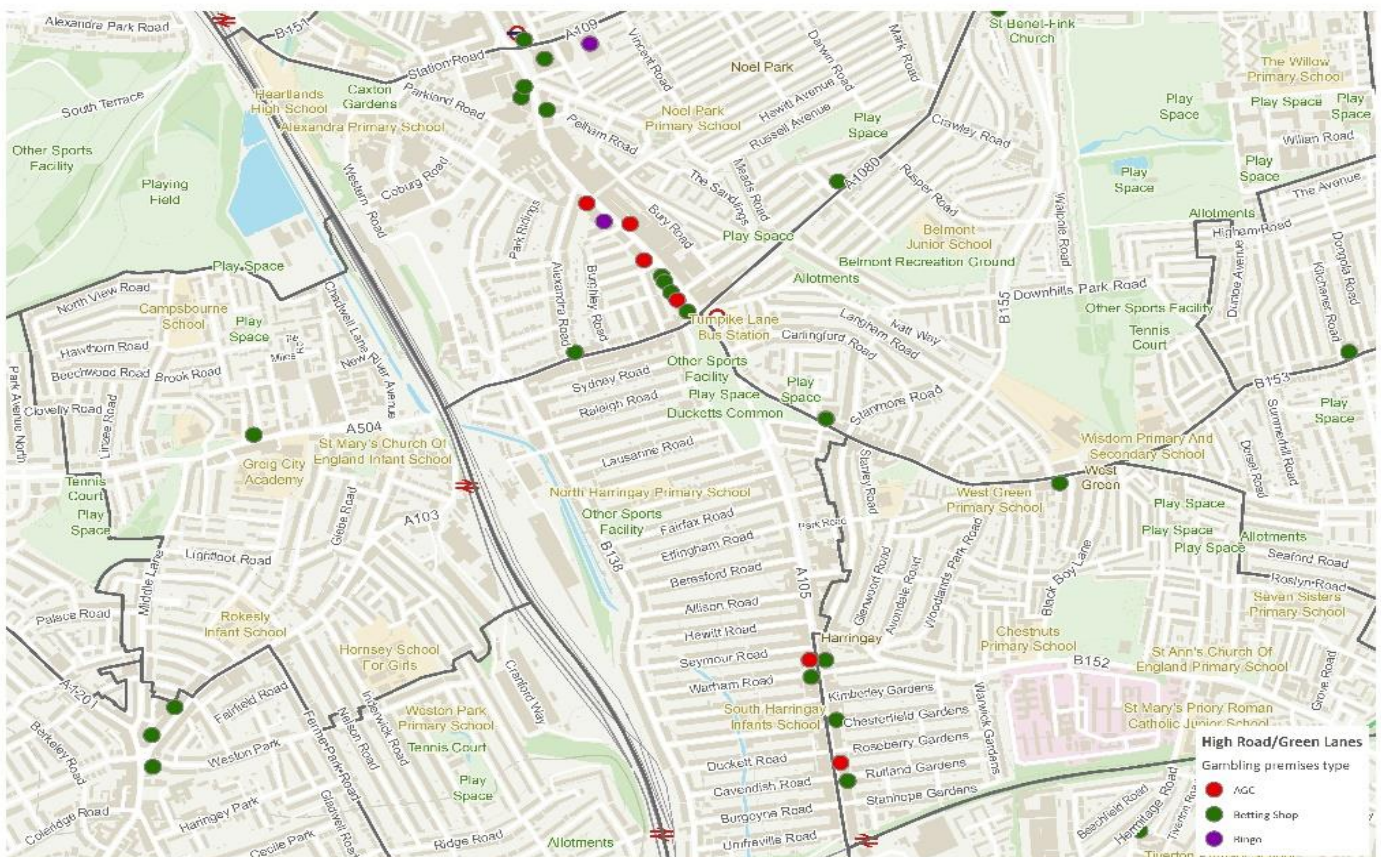


Figure 1. Map of gambling premises on High Road and Green Lanes the area of the borough with the highest concentration.

Late-night Gambling

Gambling late at night is recognised as being associated with harmful gambling (Gambling Commission, 2021).²

The extension of opening hours to late night means those who are at greater risk of gambling harm are likely to stay up late and subsequently becoming sleep deprived leading to the individual to gamble even more. Sleep deprivation makes individuals pursue bigger risks and give less consideration to negative consequences.³

The health impacts of disrupted sleep and sleep deprivation are well researched⁴ - consideration must be given to residents as it can impact their mental health and sleep.

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.

² <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/advisory-board-for-safer-gambling-advice-to-the-gambling-commission-on#22>

³ <https://www.rsph.org.uk/about-us/news/would-night-time-restrictions-on-online-gambling-reduce-harms.html>

⁴How does sleep relate to mental health? Mind (2020). Last accessed [online](#) March 2023.

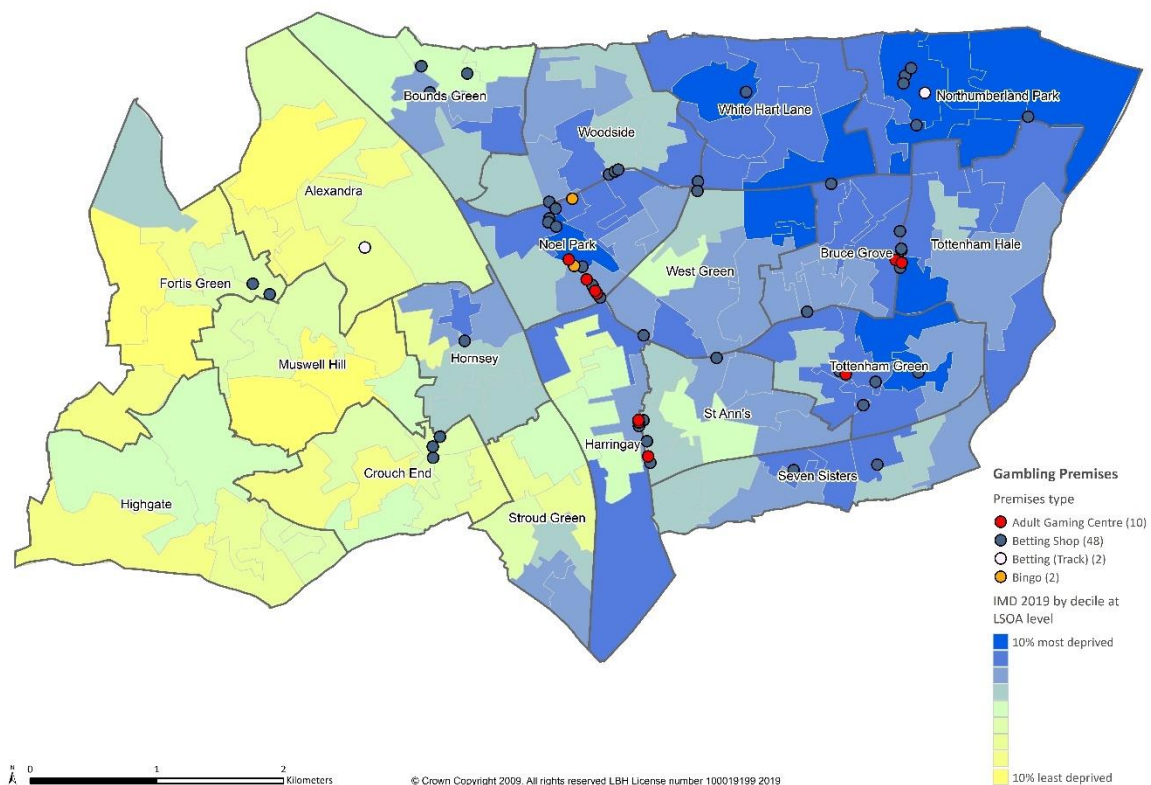


Figure 2. Map of the location of gambling premises in Haringey, 2023.

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.

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.

The Harringay Ward area is one of the most deprived areas in London, data from the Census 2021 shows that 34.9% of households are experiencing at least one dimension of deprivation⁵. The Public Health team believe the proposal of another late-night adult gaming centre will make matters worse for the residents in terms of health and wellbeing. The most disadvantaged groups have the lowest gambling participation rates, but the highest levels of harmful gambling and they are also the most susceptible to harm, which is likely to make existing health inequalities worse (PHE, Gambling-Related Harms Review 2021).

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

⁵ Household deprivation: Census 2021. ONS (2023).

- 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 halls per 10,000 of the population (Table 1) which is much higher than the national average of 1.6 per 10,000⁶. Furthermore, at a ward level, it shows Haringay Ward has the highest number of gambling premises than the rest of the wards, with nearly 2 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
Haringay	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

⁶ 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

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

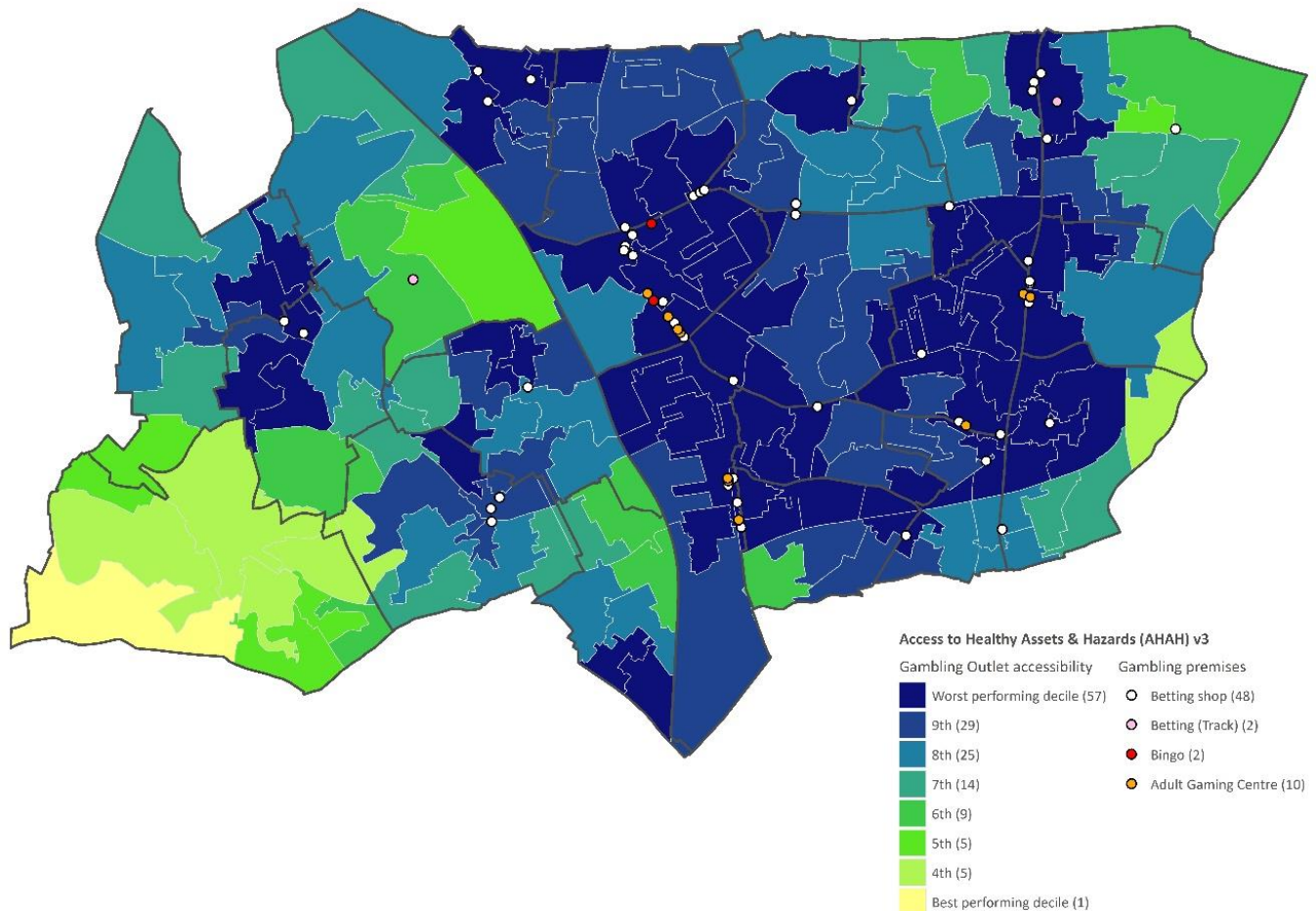


Figure 3. Map of Access to Health Assets and Hazards focus on gambling outlet accessibility in Haringey, 2022.

This map is sourced from the Consumer Data Research Centre. They have developed the AHAAH (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 harm⁷. 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 deprivation⁸.

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 homelessness⁹.

⁷ Guidance to licensing authorities. Gambling Commission (2021). Last accessed [online](#) March 2023.

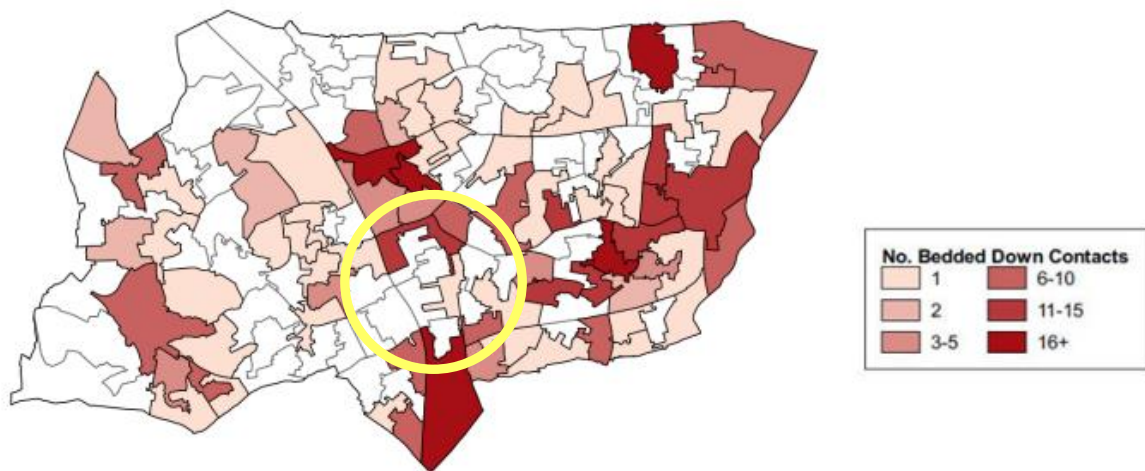
⁸ A 'Whole Council' Approach to Gambling. London Councils. London Councils, 2018. Last accessed [online](#) March 2023.

⁹ Homelessness and gambling: a complex relationship. Sharman, S. et al., (2016). Last accessed [online](#) March 2023.

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 2012¹⁰).

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 and Green Lanes (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.



In Haringey people are generally seen bedded down in the Finsbury Park, Green Lanes, Wood Green and Tottenham areas. The shown map represents volume of contacts rather than individuals, and some people may have been seen on multiple occasions within a given area

¹⁰ Rates of problematic gambling in a British homeless sample: a preliminary study. Sharman, S., et al. (2015) Last accessed [online](#) March 2023.

Substance misuse

There is frequently a link with alcohol or drugs as a way of coping with anxiety or depression caused by gambling problems.¹¹ 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.

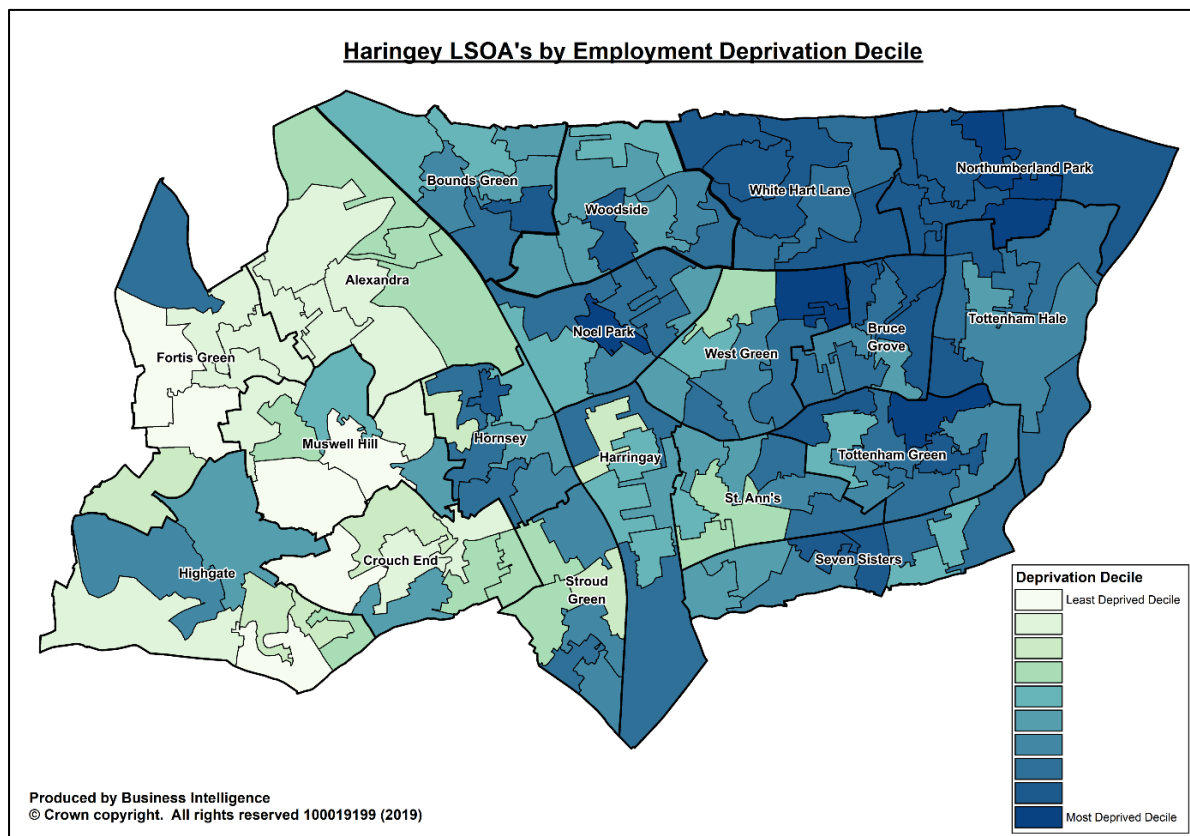
Unemployment or Low-Income Groups

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.

Haringay Ward has high level of employment deprivation and poverty in the borough. 9% of Haringay residents are unemployed as shown in Figure 5. This is above the England value (5%).

Figure 5. Employment deprivation in Haringey, 2019.

¹¹ Excessive gambling and substance abuse: is there a relationship? Griffiths, M. et al. (2009). Last accessed [online](#) March 2023.



Public Health Data in Harringay Ward highlights¹²;

- 2,040 residents are in income deprivation, which is significantly worse than England value.
- 405 children are in poverty, which is significantly worse than England value.
- 527 older people are in poverty and income deprivation, which is significantly worse than England value.
- 969 residents are unemployed (working age population claiming out of work benefits), which is significantly worse than England value.
- 31 residents are in long-term unemployment, which is significantly worse than England value.
- 1,892 households are overcrowded based on overall room occupancy levels, which is significantly worse than England value.

In Harringay, 16.8% residents claim universal credits, which is ranked 2nd highest in the borough. The rate of claimants in Harringay is almost 25% higher than the London rate. During COVID, Harringay 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.

¹² [Local Health. Public Health Data for small geographic areas - Data - OHID \(phe.org.uk\)](https://phe.org.uk/data/public-health-data-for-small-geographic-areas/)

Low Income Family Tracker (LIFT) data

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

The table below shows the number of vulnerable residents of Harringay ward.

Table 2.

	Number of residents within Harringay Ward
In cash short fall	294
Unemployed (Low barriers to work)	414
Unemployed under 25	35 (ranked 5 th highest in the borough)
Food Poverty	293
Fuel Poverty	552
Relative Poverty	455
NEET (Young People not in education, employment, or training)	93

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

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

Primary Schools

- South Harringay Infant School (0.099 miles)
- South Harringay Junior School (0.130 miles)
- St John Vianney Catholic Primary School (0.306 miles)
- Chestnuts Primary School (0.342 miles)
- North Harringay Primary School (0.386 miles)
- West Green Primary School (0.406 miles)

Green Lanes has good extensive transport links such as bus stops (Harringay Green Lanes) and stations (Haringey Green Lanes Overground and Harringay Station), 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 Green Lanes 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 extension of hours 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 this and expressed very strongly how disappointed they were to see the number of gambling premises on the high street increasing.

Residents Survey 2021

Neighbourhood safety in Haringay is seen to decline significantly after dark (93% feel safe during the day and 55% feel safe after dark).

8% of residents of Haringay Ward felt the area is quiet and peaceful.

Haringay Ward is one of the four wards where crime and anti-social behaviour is notably disliked by residents.

Homeless households in Temporary Accommodation

Figure 5 shows a cluster of homeless households in temporary accommodation living near 513 Green Lanes circled in red. It highlights the vulnerability within the area. In Haringay Ward, there are a total number of 80 homeless households in temporary accommodation, this is the 5th highest in the borough.

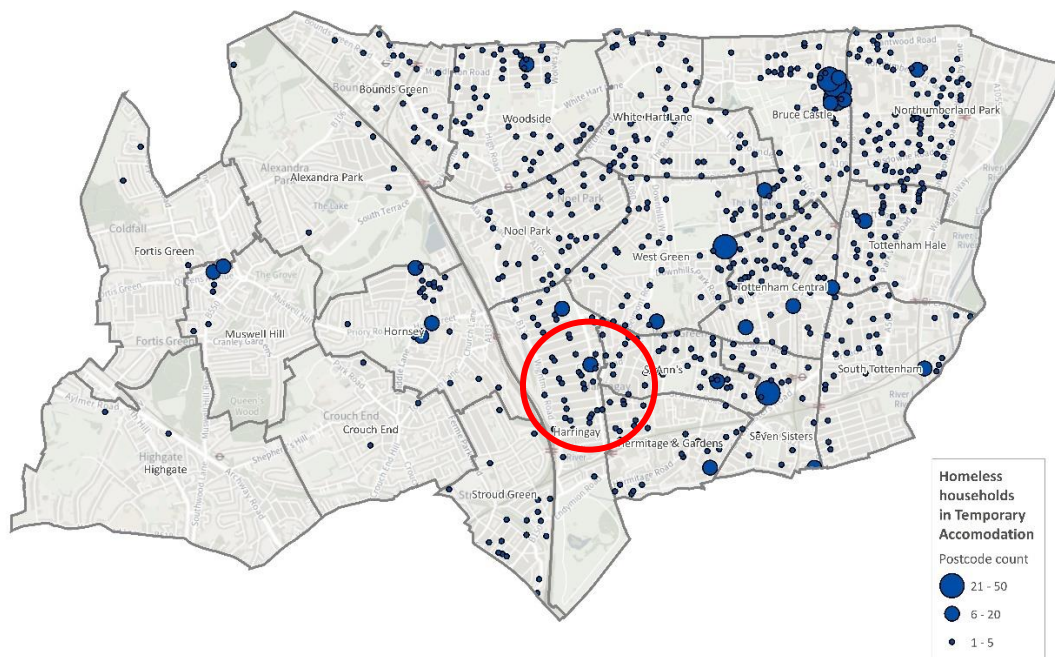


Figure 6. Map of Homeless Households in Temporary accommodation

Crime

The premises is located within the Haringey ward which is ranked high in crime rate. The most common form of crime is theft and violence against the person, as shown in figure 6.

In Haringey Ward, there has been 42 business burglaries and 8 business robberies (Metropolitan Police Service, 2021-23).

Much of the focus on gambling-related crime tends to be upon people experiencing gambling harm. Criminal behaviour is most associated with people experiencing gambling harm as they 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 problems¹³.

¹³ Betting shops and crime: is there a relationship? Griffiths, M. (2011). Last accessed [online](#) March 2023.

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

Haringey's crime rate is 122.7 per 1,000 population, compared to 109.2 for London. This is 12% above the London average.

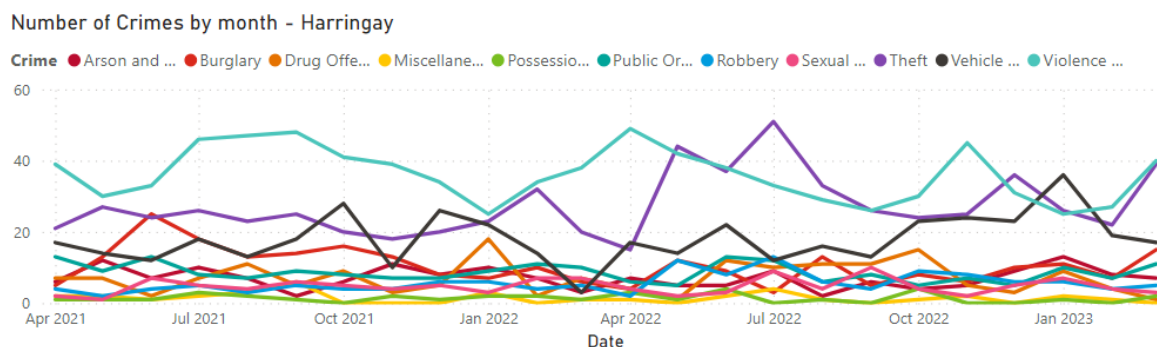


Figure 6. Number of Crimes by month (Haringey Ward Profiles, 2023)

Linking with the Borough Plan Priorities and Local Plan

Borough Plan 2019-23:

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

Local Plan SP14 Health and Well-being:

Work with NHS Haringey in its goal to reduce health inequalities in the areas with poorest health

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 [Corporate Plan 2022-24](#) 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. Extending the operating hours of the 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.