

**Public Health Objection to Planning Application – 448-454 High Road, Tottenham,
London, N17 9JD (HGY/2023/1804)**

Health in All Policies Team, Public Health

26th September 2023

Proposal

**Variation of condition 3 (hours of operation) of appeal decision
APP/Y5420/W/20/3260036 (ref. HGY/2020/1777) for: Change of use of the ground floor
to part adult gaming centre and part coffee and cake shop, namely to extend the
opening hours to: Thu, Fri and Sat: from 0900hrs to 0600hrs the following day; and Sun,
Mon, Tue and Wed: from 0900hrs to 0200hrs the following day.**

Summary

The Public Health team object to a planning application for an adult gaming centre at Tottenham High Road 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, Tottenham Hale 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.

Comments on Planning application

1. The hours of operation agreed under a consent order is for 450-454 High Road and not 448. There needs further clarity on this.
2. *Headcounts at City Gaming Limited, 108 Kilburn High Road (Doc A12-A14)*
This assessment is not relevant to Tottenham as the two areas are geographically different with distinct characteristics and vulnerabilities as well as different buildings.
3. *Headcounts at 448-454 High Road, N17 9JN (Doc A7-A11)*
The analysis of the headcounts is not strong evidence with no information on the customer profile and individual responsible for undertaking the assessment. We cannot determine whether the visitors are vulnerable to problem gambling.
4. Public Health object to the approval of advertisements and projecting sign box. The comparison sites used in the application 456-460 High Road and 468 High Road are retail premises which do not pose gambling harm risks to customers. Furthermore, the retailer's projected sign is not halo lit. The other gambling premises

do not have a projected sign box and are not further illuminated i.e. pin-mounted halo lit lettering of Game Nation, ruby strip.

5. There is no further information about the operation of the two advertising screens. The hours of operating and what advertisements will be shown. Public Health is wary the type of advertising shown could attract vulnerable and young people.

Location

The Public Health team has evaluated the area of which the premises is located. This proposal is at a vulnerable location with one other adult gaming centres (AGCs) within less than a 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, Tottenham Hale 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.

AGC on High Road in proximity to the proposed premises:

- **Admiral**, 475A High Road, Tottenham, London, N17 6QA. (161 ft, less than 1 min walk)

There is one betting office in proximity to the proposed premises:

- **Ladbrokes**, Betting Office, 480 High Road, Tottenham, London, N17 9JF. (338 ft, less than 1 min walk)

There are three other gambling premises on High Road within 3 minute walk to Admiral:

- **Ladbrokes**, 529-535 High Road, Tottenham, London, N17 6SB. (0.1 miles, 3 min walk)
- **William Hill**, 440, 440-442 High Road, Tottenham, London, N17 9JB. (171 ft, less than 1 min walk)
- **Paddy Power**, 486 High Road, Tottenham, London, N17 9JF. (308ft, less than 1 min walk)

Figure 1 highlights a high number of gambling premises on Tottenham High Road. The Public Health team do not see how varying the hours of the 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.”



Late-night Gambling

Gambling late at night is recognised as being associated with harmful gambling (Gambling Commission, 2021).¹

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.²

The health impacts of disrupted sleep and sleep deprivation are well researched³ - 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 people experiencing gambling harms as a co-morbidity to estimate the associated costs.

Number of people experiencing gambling harms in Haringey

The estimated number is 4060 residents and affected other based on nationally recognised research of six to ten affected others means that at the lower end 24,000 residents are affected, however, up to 40,600 could be affected by gambling harms and as we have already demonstrated this will be higher in areas of higher deprivation and vulnerability.

Approximately 145 patients in total are receiving NHS gambling addiction treatment in Haringey (2022).

¹ <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/advisory-board-for-safer-gambling-advice-to-the-gambling-commission-on#22>

² <https://www.rsph.org.uk/about-us/news/would-night-time-restrictions-on-online-gambling-reduce-harms.html>

³How does sleep relate to mental health? Mind (2020). Last accessed [online](#) March 2023.

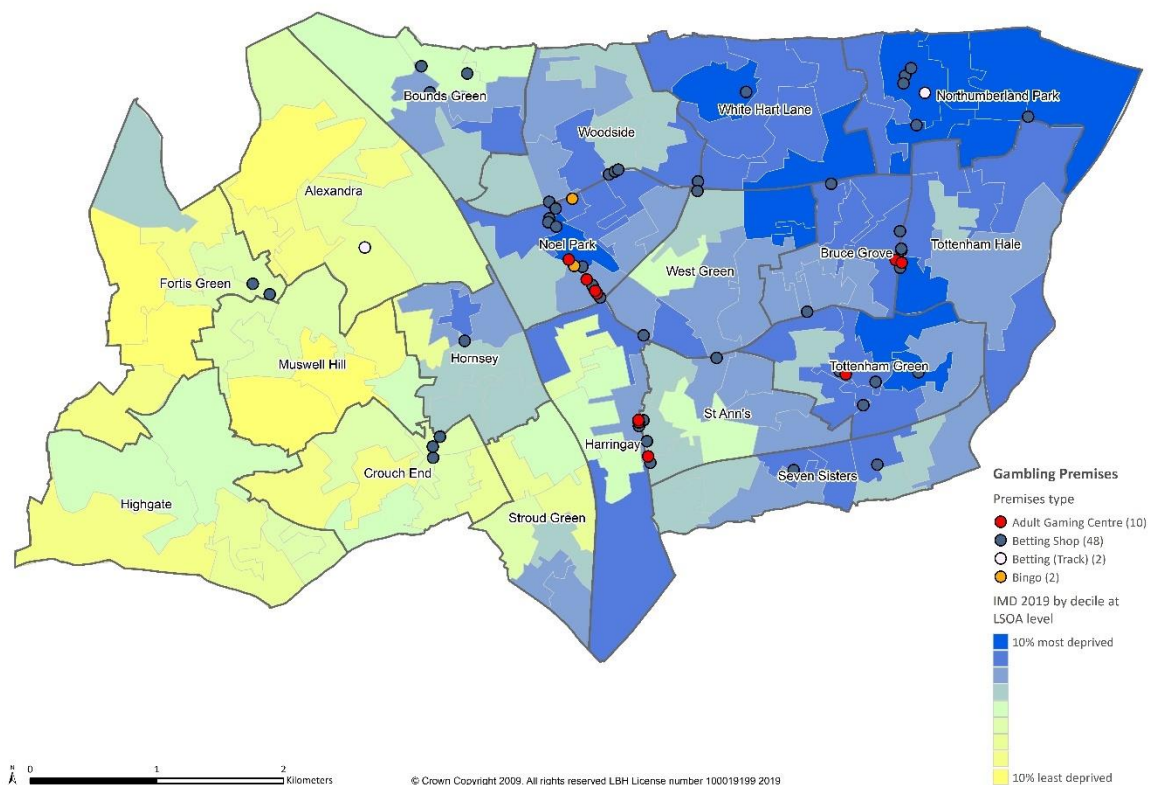


Figure 2. Map of the location of gambling premises in Haringey, 2023.

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 Tottenham Hale ward area is one of the most deprived areas in London, data from the Census 2021 shows that 35% of households are experiencing at least one dimension of deprivation⁴. 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 Tottenham Hale Ward ranks high in all risk factors associated with gambling-related harm in individuals, as listed below:

⁴ 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 10,000⁵. Furthermore, at a ward level, it shows Tottenham Hale 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
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

⁵ 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.

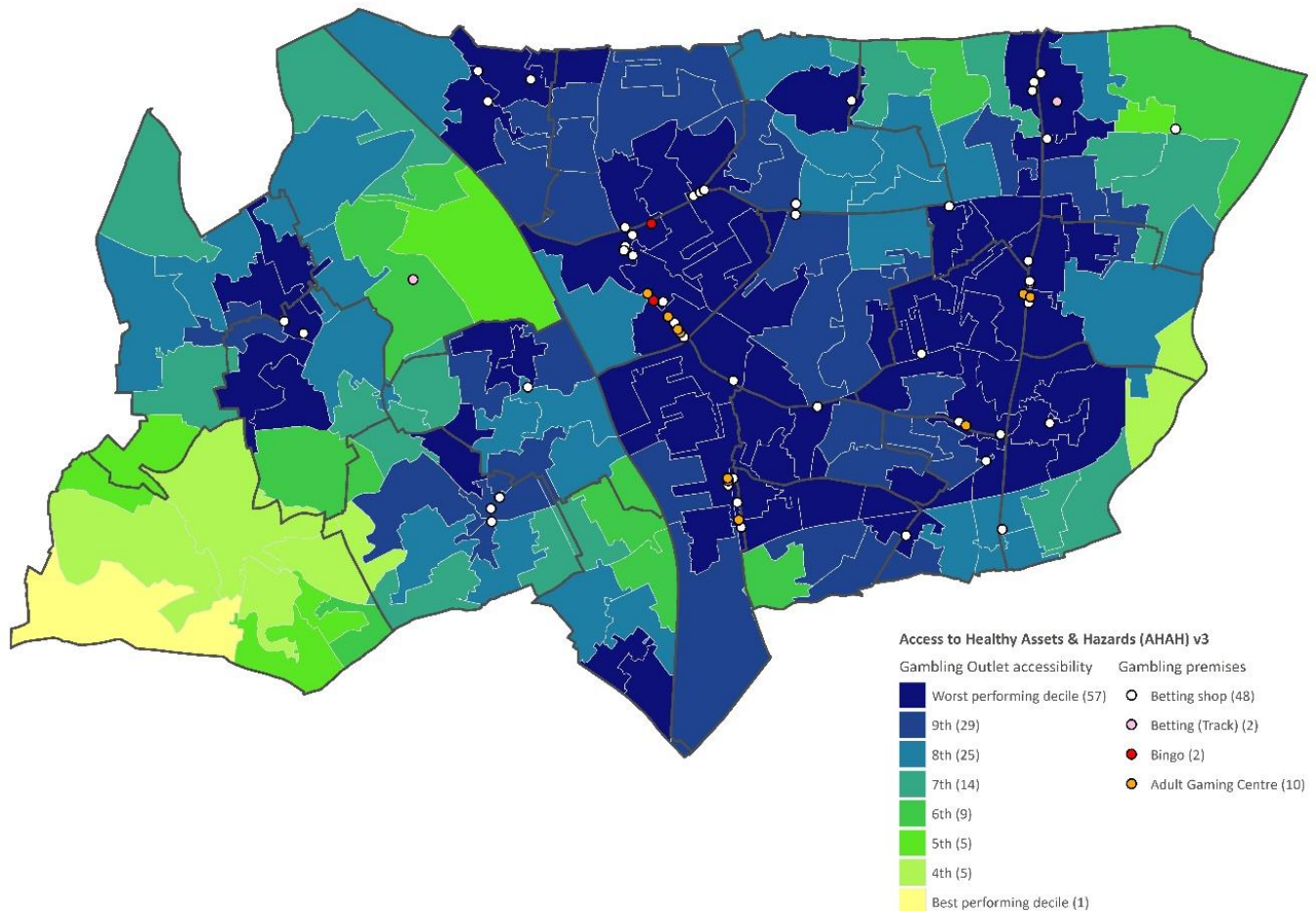


Figure 3. Map of Access to Health Assets and Hazards focus on gambling outlet accessibility in Haringey, 2022.

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 harm⁶. 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 deprivation⁷.

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 homelessness⁸.

⁶ Guidance to licensing authorities. Gambling Commission (2021). Last accessed [online](#) March 2023.

⁷ A 'Whole Council' Approach to Gambling. London Councils. London Councils, 2018. Last accessed [online](#) March 2023.

⁸ Homelessness and gambling: a complex relationship. Sharman, S. et al., (2016). Last accessed [online](#) March 2023.

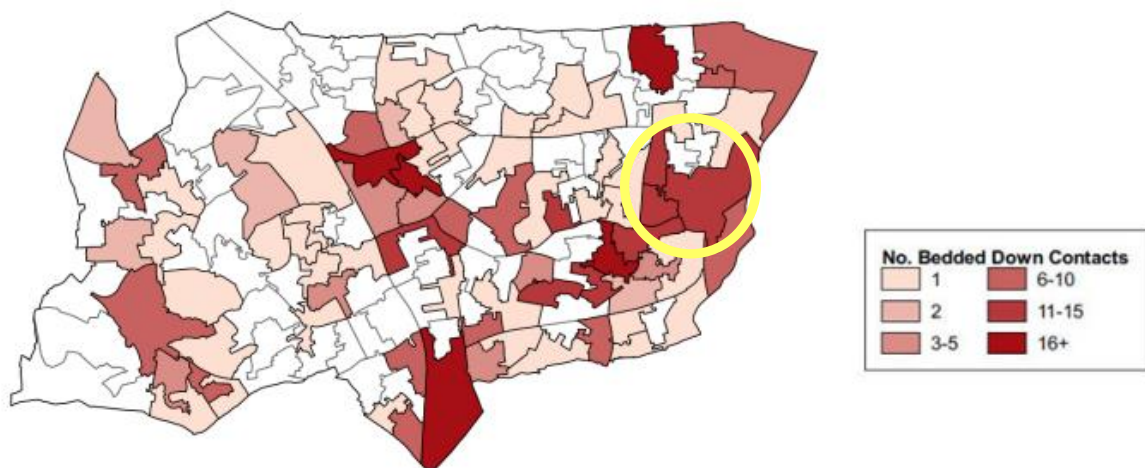
Another research reinforces the assertion that problem gambling is a significant issue within the homeless population and is more commonly a cause than a consequence of homelessness (Sharman, Dreyer & Clark 2012⁹).

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 Tottenham Hale Ward (yellow circle). There was a total of 268 people rough sleeping in 2021/22.

Mulberry Junction in Tottenham is a dedicated resource centre for single people aged 18+ affected by or at immediate risk of homelessness, services such as debt support, accessing benefits, mental health support is provided.

This is located 0.3 miles (6 minutes' walk) away from Game Nation

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

⁹ Rates of problematic gambling in a British homeless sample: a preliminary study. Sharman, S., et al. (2015) Last accessed [online](#) March 2023.

Substance misuse

The premises is within close proximity to a drug treatment service (The Grove), which provides treatment services for 978 people approx. (2020-21).

There is evidence to show links with alcohol or drugs as a way of coping with anxiety or depression caused by gambling problems.¹⁰ 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.

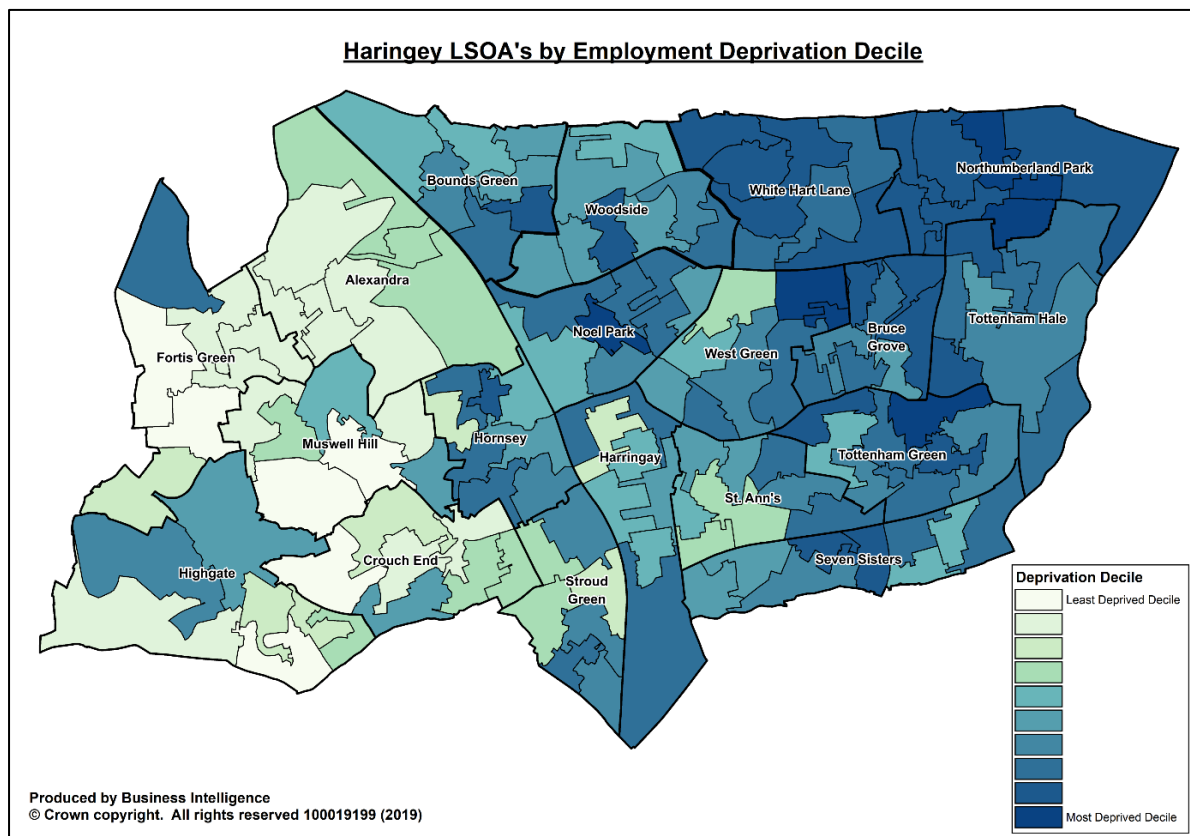
Unemployment or Low-Income Groups

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.

¹⁰ Excessive gambling and substance abuse: is there a relationship? Griffiths, M. et al. (2009). Last accessed [online](#) March 2023.



Public Health Data in Tottenham Hale Ward highlights¹¹;

- 4,141 residents are in income deprivation, which is significantly worse than England value.
- 1,191 children are in poverty, which is significantly worse than England value.
- 778 older people are in poverty and income deprivation, which is significantly worse than England value.
- 431 older people are living alone, which is significantly worse than the England value.
- 1,378 residents are unemployed (working age population claiming out of work benefits), which is significantly worse than England value.
- 57 residents are in long-term unemployment, which is significantly worse than England value.
- 1,731 households are overcrowded based on overall room occupancy levels, which is significantly worse than England value.

In Tottenham Hale, 19.9% residents or 1,920 claim universal credits (November 2022). 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.

¹¹ [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 Tottenham Hale Ward
In cash short fall	237
Unemployed (Low barriers to work)	322
Unemployed under 25	20
Food Poverty	236
Fuel Poverty	668
Relative Poverty	455
NEET (Young People not in education, employment, or training)	136

Food Poverty

7% of residents in 2021 said that there was a time in the last 12 months when they were worried their household would not have enough food.

This varied significantly by ward with those in Northumberland Park, White Hart Lane, Bruce Grove and Seven Sisters most likely to feel this. Key highlights from resident's survey that 10% of residents living within in Tottenham Hale, St Anns and Northumberland Park wards reported financial difficulties and Tottenham Hale featured in resident's who had fears they would not have enough food to eat.

Homeless households in Temporary Accommodation

Figure 5 shows a cluster of homeless households in temporary accommodation living near the proposed premises circled in red. It highlights the vulnerability within the area. In Harringay Ward, there are a total number of 64 homeless households in temporary accommodation.

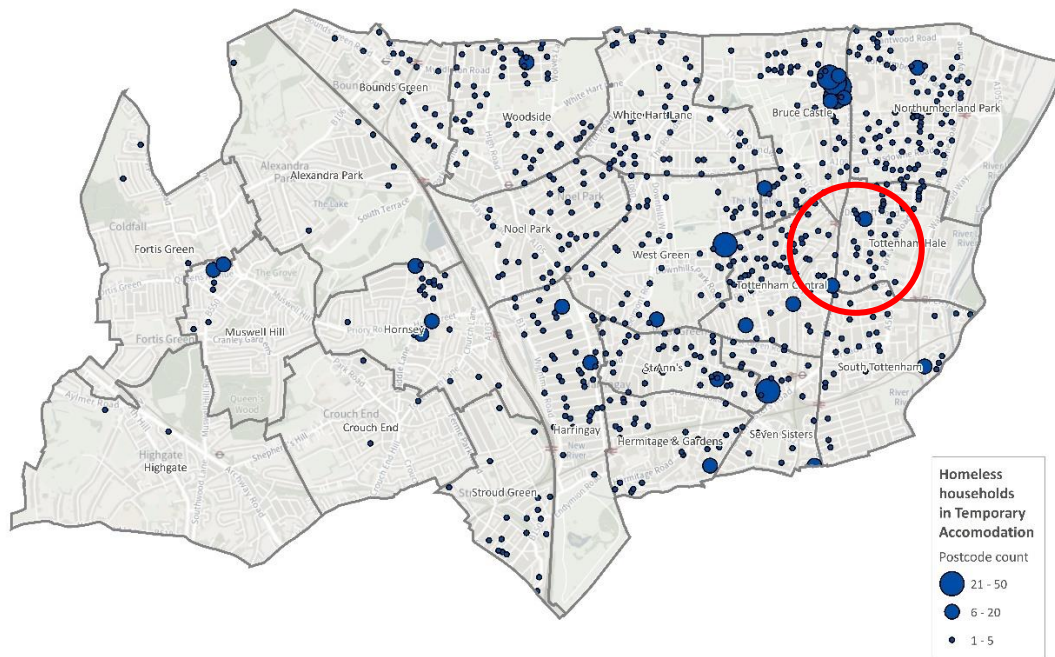


Figure 6. Map of Homeless Households in Temporary accommodation

Crime

The premises is located within the Tottenham Hale Ward which is ranked high in crime rate. The most common form of crime is theft and violence against the person. In March 2023, the rate of theft has had a sharp increase and has been the highest, as shown in figure 6.

The British Retail Consortium (BRC) Crime Survey 2023 shows an increasing pattern of violence and abuse in the UK, almost double that of pre-pandemic levels, including significant rises in violence and shop theft. [According to figures from retail trade body](#) the British Retail Consortium (BRC), retail thefts across the sector in England and Wales rose by 26% in 2022.

In Tottenham Hale Ward, there has been 183 thefts from person, 376 shoplifting incidents, 80 business burglaries and 17 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 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 problems¹².

The most common offences committed by problem gamblers 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.

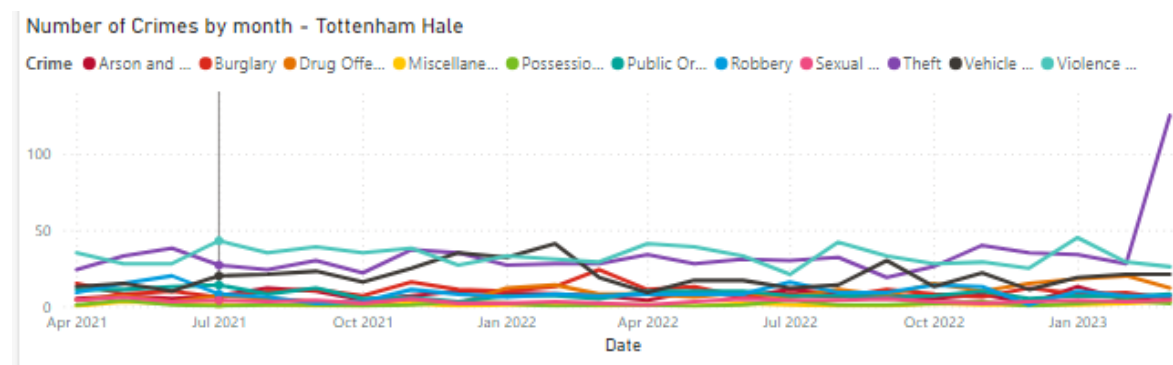


Figure 6. Number of Crimes by month (Haringey Ward Profiles, 2023)

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

Tottenham Hale Ward has the highest proportion of population group with those aged 0-19, higher than the Haringey and London average (Source: Haringey Ward Profile).

There are 2,772 children aged under 18 living in Tottenham Hale Ward (ONS,2023).

The Bruce Grove Youth Centre located near the premises has previously raised concern on a proposed gambling premises at the same location and the negative impacts on young children and other vulnerable individuals accessing their centre.

There are four primary schools, secondary school and two sixth form/colleges located within half a mile of the premises (ten-minute walk).

Primary Schools

- Holy Trinity CE Primary School (0.202 miles)
- Bruce Grove Primary School (0.211 miles)

¹² Betting shops and crime: is there a relationship? Griffiths, M. (2011). Last accessed [online](#) March 2023.

- The Mulberry Primary School (0.266 miles)
- Welbourne Primary School (0.311 miles)

Secondary School

- Harris Academy Tottenham (0.402 miles)

Sixth Forms and Colleges

- Harris Academy Tottenham Sixth Form (0.401 miles)
- The College of Haringey, Enfield and North East London (0.448 miles)

Grove overground station, which is used by children and young people travelling to and from school or other activities. 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 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 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.

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.