Annex 2

LONDON BOROUGH OF ENFIELD

GAMBLING ACT 2005

GAMBLING LOCAL AREA PROFILE

January 2022



1.1 Introduction and Background

1.1.1 The Council is the licensing authority under the Gambling Act 2005 (the Act) and is responsible for issuing premises licences and permits for gambling venues. When the Council exercises its functions in respect of gambling, it must have regard to the Act and its regulations, gambling codes of practice, the Council's Statement of Licensing Policy and the Gambling Commission's Guidance to Local Authorities (GLA).

1.1.2 The Act also requires the Council to 'aim to permit' gambling and therefore aim to issue premises licences if applications are reasonably consistent with the following licensing objectives:

a) preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime

b) ensuring that gambling is conducted in a fair and open way, and

c) protecting children and other vulnerable persons from being harmed or exploited by gambling

- 1.1.3 In its GLA, the Gambling Commission recommends the approach the Council should take to gambling licensing and regulation. In September 2015, the Gambling Commission issued a revised GLA (5th edition) with many changes for licensing authorities that fall under three broad themes:
- increased focus on risk and regulation
- greater attention to local area risk, and
- encouraging partnership and collaboration between stakeholders to mitigate risk
- 1.1.4 In addition, changes to the Gambling Licence Conditions and Codes of Practice (LCCP) that took effect in April 2018, require all industry operators to undertake local area risk assessments to identify the risks their gambling venues pose to the licensing objectives.

1.2 What is a gambling local area profile?

1.2.1 A local area profile is an assessment of the key characteristics of Enfield in the context of gambling-related harm. The information obtained for the assessment helps to provide a better understanding of the types of people that are at risk of being vulnerable to gambling-related harm; where they are located and any current or emerging problems that may increase that risk. Our local area profile will help us to develop our Statement of Licensing Policy and set out our expectations of operators of gambling premises.

1.3 Creating Enfield's local area profile

1.3.1 Although there is no legal requirement on the Council to complete a local area profile, we feel there is significant benefit for operators, our residents, business, visitors to Enfield and the Council to have an evidence-based awareness of the potential and actual risks of vulnerability to gambling-related harm.

1.3.2 In this context and in response to the changes in the GLA, we have completed an assessment of the key characteristics of the Borough to identify areas of higher risk of vulnerability to gambling-related harm. This assessment is Enfield's local area profile. In developing our local area profile, we have had regard to the study 'Exploring area-based vulnerability to gambling-related harm: Developing the gambling- related harm risk index' and 'Exploring area based vulnerability to harm: who is vulnerable?, Heather Wardle, Gambling and Place Research Hub, Geofutures, 9th February 2016', which was commissioned by Manchester City Council and the City of Westminster.

1.4 Our approach

1.4.1 The data which identify potential vulnerability to gambling-related harm in Enfield is visualised on maps in Section 3 below.

1.4.2 Our approach is based on the possible risk to gambling-related harm and does not mean that just because an area is seen as being at higher risk that all people in that area will suffer harm or be at risk of suffering harm.

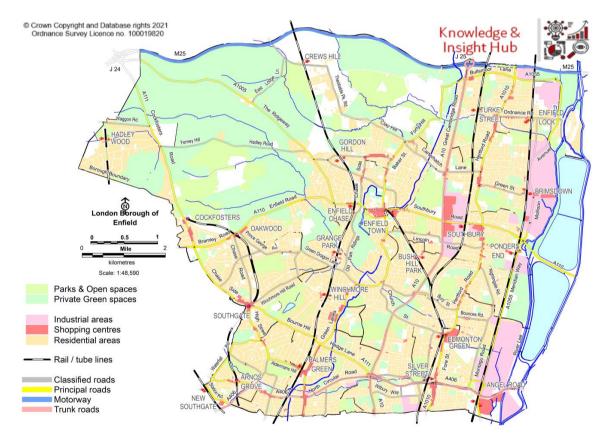
2.1 Profile of London Borough of Enfield

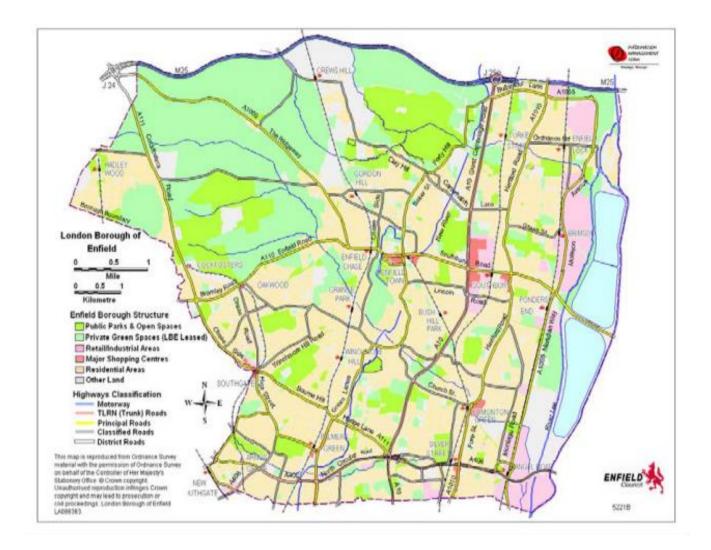
2.1.1 Enfield is London's northernmost Borough and covers an area of 8219 hectares (82.2 square kilometres, or 31.7 square miles). Enfield has good links to the national motorway system, the north of the borough being bounded by the M25, accessed at junctions 24 and 25. It also has two trunk roads – the A10 (London to Cambridge) and A406 (London's North Circular Road).

2.1.2 In 20196, the total dwelling stock in Enfield was estimated by the Office for National Statistics at 126,255.

2.1.3 40% of the Borough's area is designated Green Belt Land (predominantly in the north and west) comprising country parks, farmland and open land (including urban parks, sports fields, golf courses, allotments and school playing fields). Figure 1.1 below shows a map of the borough.

Figure 1.1:

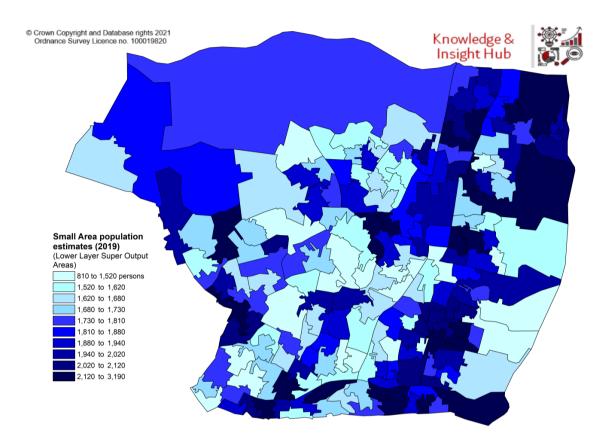




2.1.4 At Mid-2020 the population was estimated to be 333,587 (according to the <u>Office for National Statistics</u>) an increase of 6.8% since 2011, making Enfield the 5th largest amongst the 33 London boroughs. 2.1.5 Females and Males made up 50.9% and 49.1% respectively of the total population. The breakdown across the borough is seen in the map, Figure 1.2 below:

Figure 1.2:

Source: ONS mid-year small area population estimates 2019



2.1.6 The latest projections to use are the ONS 2020 Mid-Year Estimates. The fiveyear age band results for persons for Mid-2020 are in Fig 2.1:

Age band	Males	Females	Persons
0-4 years	11,949	11,351	23,300
5-10 years	12,599	11,920	24,519
10-14 years	12,197	11,494	23,691
15-19 years	10,418	9,474	19,892
20-24 years	9,640	8,527	18,167
25-29 years	12,045	11,397	23,442
30-34 years	12,206	12,805	25,011
35-39 years	12,017	13,464	25,481
40-44 years	11,131	12,168	23,299
45-49 years	10,645	11,385	22,030
50-54 years	11,072	11,755	22,827
55-59 years	9,968	10,922	20,890
60-64 years	8,047	8,154	16,201
65-69 years	5,828	6,645	12,473
70-74 years	5,152	5,845	10,997
75-79 years	3,784	4,734	8,518
80-84 years	2,761	3,759	6,520
85-89 years	1,603	2,451	4,054
90+ years	757	1,518	2,275
All Ages	163,819	169,768	333,587

2.1.7 The child, working age and older population results by gender are shown in Figure 2.2:

Figure 2.2:

Age band	Males	Females	Persons
0 to 15	39,073	36,847	75,920
16 to 64	104,861	107,969	212,830
65+	19,885	24,952	44,837
Total	163,819	169,768	333,587

Source: ONS mid-year estimates 2020

2.1.8 The breakdown of the 22 different ethnic groups in Enfield is shown in Figure 3:

Figure 3:

Ethnicity	Estimated population size	% of total population
White British	118,466	35.3%
White Irish	7,309	2.2%
Greek	4,549	1.4%
Greek Cypriot	16,302	4.9%
Turkish	24,209	7.2%
Turkish Cypriot	6,432	1.9%
Kurdish	4,264	1.3%
White Other	25,381	7.6%
White & Black Caribbean	4,664	1.4%
White and Asian	4,348	1.3%
White and Black African	2,471	0.7%
Other mixed	6,890	2.1%
Indian	11,937	3.6%
Pakistani	2,829	0.8%
Bangladeshi	6,432	1.9%
Chinese	2,732	0.8%
Other Asian	12,852	3.8%
Somali	9,157	2.7%
Other Black African	24,763	7.4%
Black Caribbean	17,725	5.3%
Other Black	8,357	2.5%
Other Ethnic Group	13,354	4.0%

Source: 2019-based in-house ethnicity estimates. NB totals do not sum to ONS totals owing to differences in data sources

3.1 The Local Area

3.1.1 The council expects matters such as the following to be considered by operators when making their risk assessment in order to demonstrate they have considered the local area. Some or many of these matters will have been considered and addressed by existing premises.

3.1.2 Matters relating to children and young persons, such as:

- The footfall in the local area, for example, does it predominately comprise residents, workers or visitors, is it a family orientated area, popular with children and young people;
- Significant presence of young children;
- Institutions, places or areas where presence of children and young persons should be expected such as schools, youth clubs, parks, playgrounds and entertainment venues such as bowling allies, cinemas etc.;
- Any premises where children congregate including bus stops, cafés, shops, and any other place where children are attracted;
- Areas that are prone to issues of youths participating in anti-social behaviour, including such activities as graffiti/tagging, underage drinking, etc.;
- Recorded incidents of attempted underage gambling;
- Transport links and parking facilities;
- Community centres;
- High crime area;
- Other gambling premises in the vicinity.
- 3.1.3 Matters relating to vulnerable adults, such as:
 - Information held by the licensee regarding self-exclusions and incidences of underage gambling;
 - Gaming trends that may mirror days for financial payments such as pay days or benefit payments;
 - Arrangement for localised exchange of information regarding self-exclusions and gaming trends;
 - Proximity of premises which may be frequented by vulnerable people such as hospitals, mental health providers, residential care homes, medical facilities, doctor's surgeries, council housing offices, addiction clinics or help centres, places where alcohol or drug dependant people may congregate, etc.;
 - Homeless or rough sleeper shelters, hostels and support services;
 - Transport links and parking facilities;
 - Community centres;
 - High crime area;
 - High unemployment area;
 - Pawn broker/pay day loan businesses in the vicinity;
 - Other gambling premises in the vicinity.

- 3.1.4 The Gambling Commission guidance advises that Licensing Authorities can provide a local area profile of their borough in their Gambling Act policy. This has many benefits but should also assist operators undertaking the risk assessments of their premises and will also be taken into account when considering applications for new and variations to licences and reviews of licences. The Local Area Profile for the London Borough of Enfield is mapped in Appendix C.
- 3.1.5 The maps in Section 4 includes data and an overview of characteristics of the borough:
 - Figure 4: Map showing distribution of gambling premises and educational establishments;
 - Figure 5: Map showing distribution of gambling premises and relevant leisure facilities;
 - Figure 6: Map showing distribution of gambling premises and medical facilities, care homes, and temporary accommodation etc.;
 - Figure 7: Map showing distribution of gambling premises and areas of deprivation;
 - Figure 8: Map showing distribution of gambling premises and areas of unemployment;
 - Figure 9: Map showing distribution of gambling premises and areas where residents claim Universal Credit;
 - Figure 10: Map showing distribution of gambling premises and areas of poor mental health;
 - Figure 11: Map showing distribution of gambling premises and all ASB Call hotspots in Enfield between April 2018 and March 2019;
 - Figure 12: Map showing distribution of gambling premises and all ASB Call hotspots in Enfield between April 2019 and March 2020;
 - Figure 13: Map showing distribution of gambling premises and all ASB Call hotspots in Enfield between April 2020 and March 2021;
 - Figure 14: table showing ASB call types recorded by Police within 20 metres of a gambling premises between March 2018 and March 2019;
 - Figure 15: table showing ASB call types recorded by Police within 20 metres of a gambling premises between March 2019 and March 2020;
 - Figure 16: table showing ASB call types recorded by Police within 20 metres of a gambling premises between March 2020 and March 2021.
- 3.1.6 If an application for a new licence or variation is submitted that is within 400 metres of a premises/location where children, young persons and vulnerable persons are likely to be present, then operators are encouraged to provide details of the measures to be implemented that would overcome the risks of:
 - Protecting children and other vulnerable persons from being harmed or exploited by gambling.
 - Being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
 - Ensuring that gambling is conducted in a fair and open way.

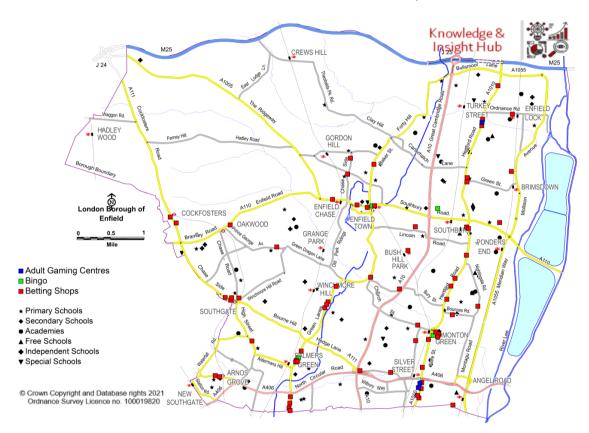
3.1.7 If the operator does not put forward measures to overcome the risks, or the Council considers that the operator's proposed measures do not adequately mitigate the risk, the council will consider what measures are needed which can include additional conditions or even refusal of the application if appropriate.

3.1.8 For gathering local information, a report was produced on the number of underage gambling complaints and failed test purchases at betting shops. Since 1st April 2018, no complaints and no sales have been recorded, compared to two complaints and nil sales between 1st April 2015 and 31st March 2018.

3.1.9 Council enforcement officers carried out inspections at all betting shops between 2019-2020, and were deemed to be compliant.

4.1 Local Area Profile

Figure 4: Map showing distribution of gambling premises and educational establishments

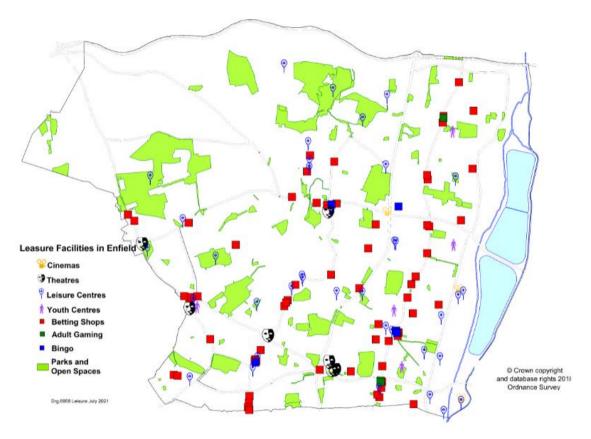


Source: Enfield Council GIS server February 2021

4.1.1 First of all, the actual distribution of existing gambling premises shops predictably shows them to be predominantly located on the main thoroughfares. Greater concentrations of betting shops are located along the Hertford Road corridor, with particular clusters around Edmonton Green shopping centre, Enfield Town and Southgate. Further away, significant clusters of betting shops are noted along Green Lanes, in the Bowes and Palmers Green centres.

4.1.2 Figure 4 identifies the educational establishments, and the map highlights that particularly in Enfield Town, they are in close proximity to the existing gambling premises.

Figure 5: Map showing distribution of gambling premises and relevant leisure facilities

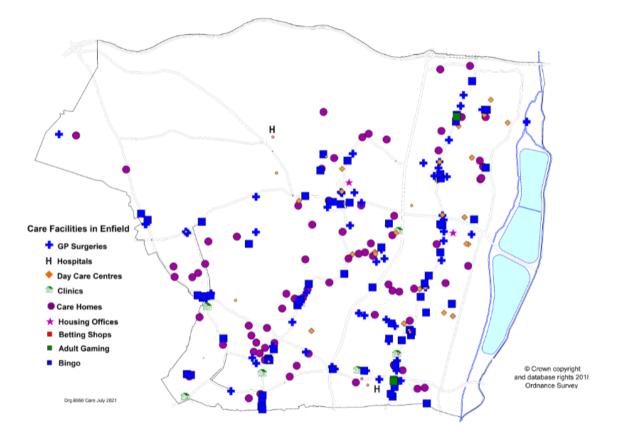


Source: Enfield Council GIS server February 2021

4.1.3 Relevant leisure facilities in Figure 5 are those that have been identified as being most appealing to those under 18, such as leisure centres, youth centres and parks. For the majority of the borough, the map shows that there are few facilities in close proximity to existing betting shops. An exception to this is the youth centre on the border of Southgate, and the leisure centre near around Edmonton Green shopping centre which appear to be in the near vicinity of gambling establishments.

Figure 6: Map showing distribution of gambling premises and medical facilities,

care homes, and temporary accommodation etc.



Source: Enfield Council GIS server February 2021

4.1.4 Figure 6 shows the clinics in Fore Street, Edmonton and in Enfield Town are central to the locations of the gambling establishments in that area. The map also identifies that there are a larger number of care homes in Palmers Green and south of the North Circular, around the Green Lanes area, which appear to be relatively close to the multiple betting shops in those areas.

Figure 7: Map showing Areas of Deprivation and gambling premises

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Source: Indices of Deprivation 2019

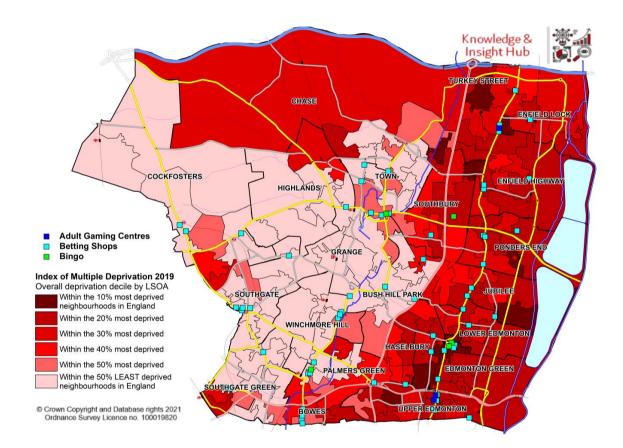
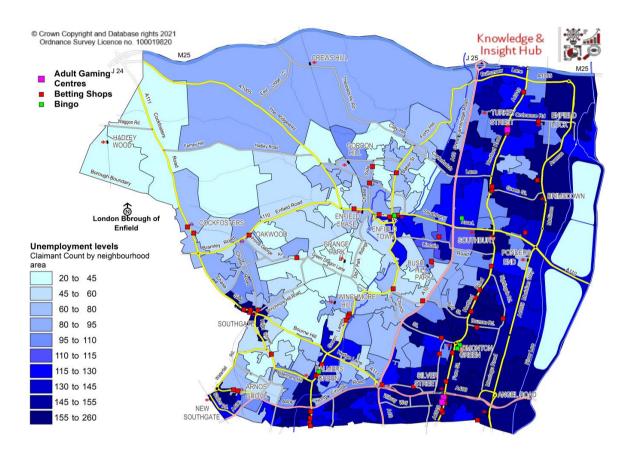


Figure 8: Map showing unemployment levels and gambling premises



Source: Office of National Statistics 2021

This thematic map shows the Claimant Count by LSOA Claimant Count is the number of people in the area who are claiming either Jobseekers' Allowance or unemployed claimants of Universal Credit. It does not include claimants of Employment and Support Allowance or Income Support.

Figure 9: Map showing concentration of households claiming Universal Credit and gambling premises

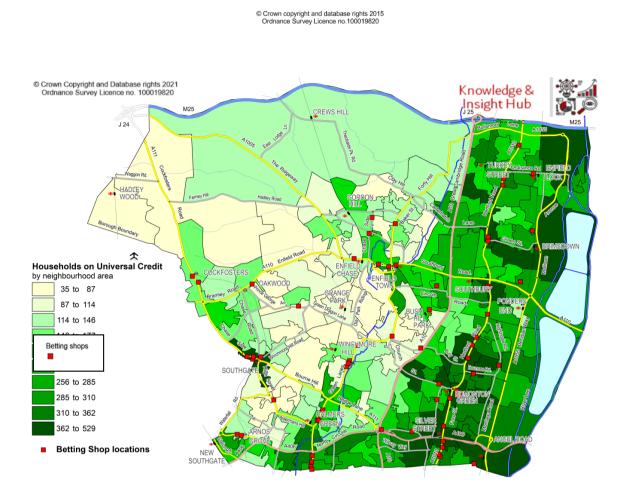
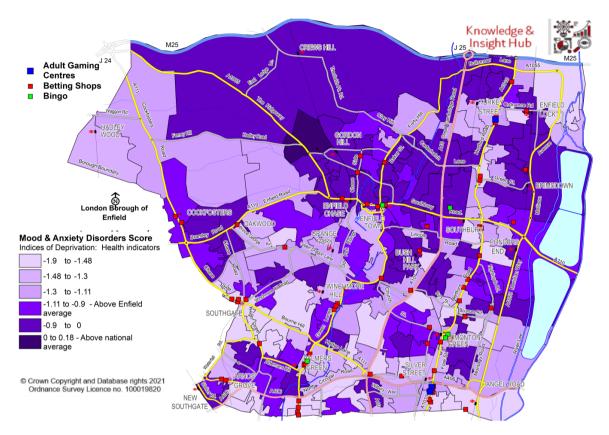


Figure 10: Map showing distribution of gambling premises and areas of poor mental health



Source: Indices of Deprivation 2019, Health domain, Indicator: Mood and Anxiety Disorders indicator. The mood and anxiety disorders indicator is a broad measure of levels of mental ill health in the local population. The definition used for this indicator includes mood (affective), neurotic, stress-related and somatoform disorders. A higher score for the indicator represents a higher level of deprivation. Part of this indicator contains public sector information licensed under the Open Government Licence v3.0. Part of this indicator uses Hospital Episodes Statistics. Hospital Episode Statistics Copyright © 2019

4.1.5 As an indication of the levels of poor mental health in the borough, Figure 10 has been produced. As the key indicates, areas range from those with the highest levels of mental health issues (dark purple) to those with the lowest levels (light purple). The borough shows a considerable range, and there are pockets of high levels to the north of the borough.

4.1.6 Figures 7 to 9 show maps of the areas of worst deprivation, highest unemployment rates and highest number of working age households claiming Universal Credit. The maps reflect a similar outcome: that the east of the borough is consistently worst affected. It highlights that there is a noticeable correlation between the areas with a higher concentration of betting shops and these areas.

Figure 11: All anti-social behaviour (ASB) Call hotspots in Enfield between April 2018 and March 2019 plotted around all gambling premises.

Source: LBE Community Safety Unit – Metropolitan Police records April 2018 to March 2019

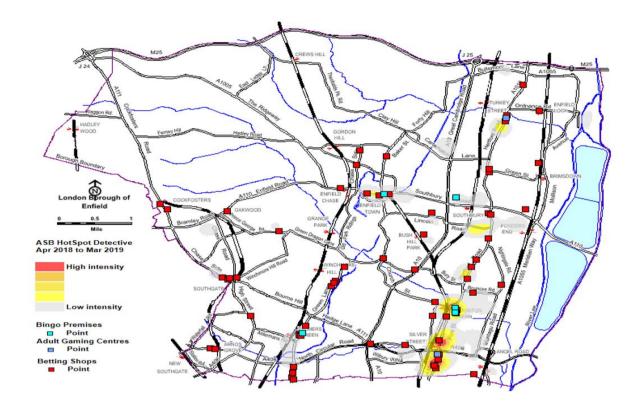
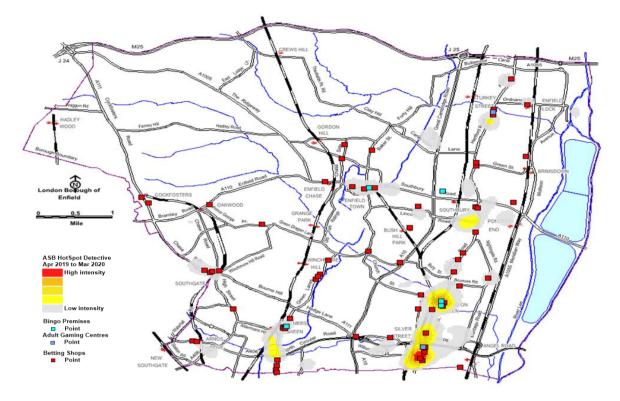
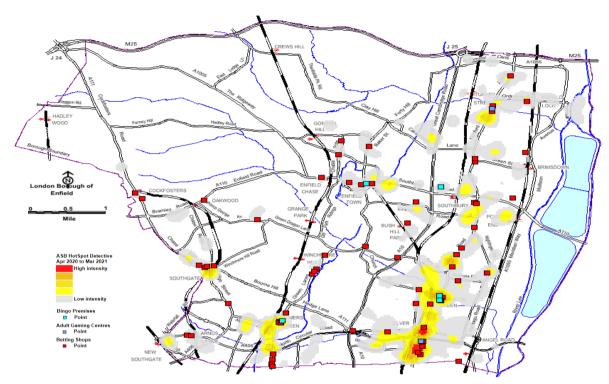


Fig 12: All anti-social behaviour (ASB) Call hotspots in Enfield between April 2019 and March 2020 plotted around all gambling premises.



Source: LBE Community Safety Unit – Metropolitan Police records April 2019 to March 2020

Fig 13: All anti-social behaviour (ASB) Call hotspots in Enfield between April 2020 and March 2021 plotted around all gambling premises.



Source: LBE Community Safety Unit - Metropolitan Police records April 2020 to March 2021

4.1.7 Since 2018, there has been an increase of ASB hotspots across the borough. A consistent ASB hotspot can be identified along Fore Street and around Edmonton Green Shopping Centre, which also has a higher concentration of gambling premises. It is also noted that there is an emerging ASB hotspot around Southgate town centre. In Fig 14, newer ASB hotspots have been identified which are not in close proximity to gambling premises. Disclaimer: For this illustration the following tables show ASB calls recorded by Police as being with 20m of a licensed premises, so may not be directly attributed to the premises.

Fig 14: ASB calls recorded by the Police within 20 metres of a gambling premises, between March 2018 and April 2019

ASB Classification	ASB Reported - 2018/19	Proportions
Rowdy Or Inconsiderate Behaviour	43	63%
Trespass	8	12%
Begging / Vagrancy	7	10%
Veh Nuisance / Inappropriate Use	6	9%
Noise	1	1%
Veh Abandoned - Not stolen	1	1%
Fireworks	1	1%
Rowdy / Nuisance Neighbours	1	1%
Total	68	100%

Fig 15: ASB calls recorded by the Police within 20 metres of a gambling premises, between March 2019 and April 2020

ASB Classification	ASB Reported - 2019/20	Proportions
Rowdy Or Inconsiderate Behaviour	52	76%
Begging / Vagrancy	8	12%
Trespass	2	3%
Veh Abandoned - Not stolen	2	3%
Rowdy / Nuisance Neighbours	2	3%
Prostitution Related Activity	1	1%
Fireworks	1	1%
Total	68	100%

Fig 16: ASB calls recorded by the Police within 20 metres of a gambling premises, between March 2020 and April 2021

ASB Classification	ASB Reported - 2020/21	Proportions
Rowdy Or Inconsiderate Behaviour	63	84%
Begging / Vagrancy	5	7%
Rowdy / Nuisance Neighbours	4	5%
Noise	3	4%
Total	75	100%

4.1.8 In both 2018/19 and 2019/20, there were 68 ASB calls recorded by Police in proximity to licenced premises which accounts for approximately 1% of the total number of ASB calls recorded in the borough in the period. This compares to 75 ASB calls were recorded by Police in 2020/21 within in a 20m proximity to licenced premises, which accounts less than 1% of the ASB calls recorded by the Police in the year in Enfield over the year to March 2021. This is a 10% increase compared to the calls recorded in the year to March 2020 near licensed premises.

4.1.9 The period from 2020/21 includes the Covid 19 lockdown period when the population was largely at home and commercial premises were closed. All ASB increased in the borough by 80% by March 2021 when compared to the year before.

4.1.10 Rowdy or Inconsiderate Behaviour was consistently the most frequently recorded ASB classification type year on year since April 2018.