

Annex 2

LONDON BOROUGH OF ENFIELD

GAMBLING ACT 2005

**GAMBLING LOCAL AREA
PROFILE**

January 2019



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.

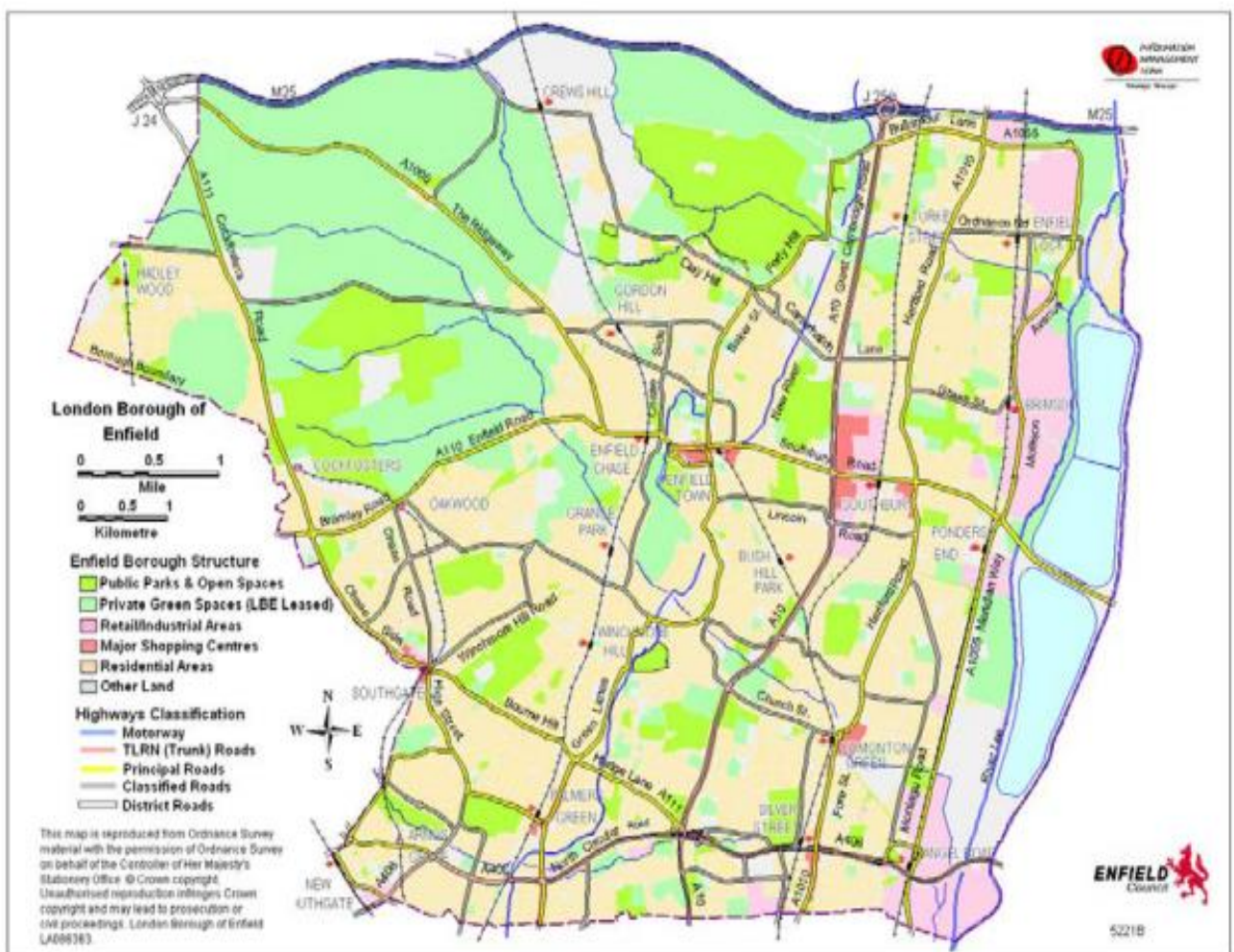
2.1 Profile of London Borough of Enfield

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 2016, the total dwelling stock in Enfield was estimated by the [Department for Communities and Local Government](#) at 124,470.

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:

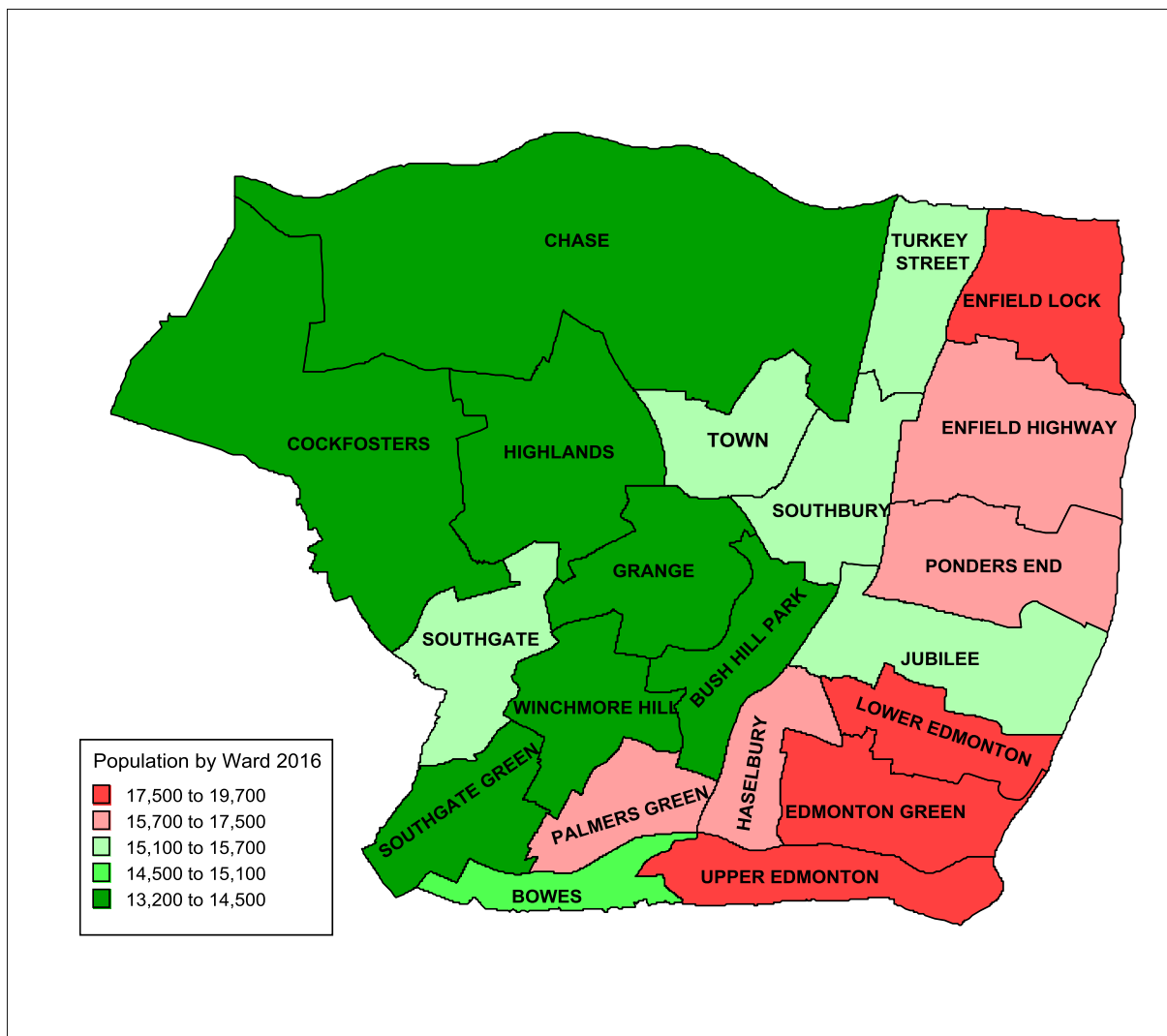


2.1.4 At Mid-2016 the population was estimated to be 331,395 (according to the [Office for National Statistics](#)) an increase of 5.56% since 2011, making Enfield the 5th largest amongst the 33 London boroughs, having been overtaken by Newham as the 4th largest London borough in 2015.

2.1.5 Females and Males made up 51.18% and 48.82% respectively of the total population. The breakdown across the wards is seen in the map, Figure 1.2 below, and the breakdown of ages is seen in Figure 2.2:

Figure 1.2:

Source: GLA 2013 Round of Demographic Projections - Ward projections Local authority population projections - based on 2013 BPO data.



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Source: ONS 2016 Mid-Year Ward Population Estimate.

2.1.6 The latest projections to use are the ONS 2016 Mid-Year Trend based projections. The five-year age band results for persons for Mid-2016 are in Fig 2.1:

Figure 2.1:

Band	Result	% of total
0-4	25077	7.57%
5-9	24856	7.50%
10-14	21319	6.43%
15-19	20192	6.09%
20-24	20130	6.07%
25-29	25660	7.74%
30-34	26144	7.89%
35-39	24502	7.39%
40-44	22390	6.76%
45-49	23577	7.11%
50-54	22461	6.78%
55-59	18422	5.56%
60-64	14109	4.26%
65-69	12319	3.72%
70-74	10220	3.08%
75-79	8101	2.44%
80-84	6095	1.84%
85+	5821	1.76%
Grand Total	331395	100.00%

Source: Office of National Statistics 2016 Mid-Year Trend based projections

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

Figure 2.2:

Age group	Male	% of Male	Female	% of Female
0-15	38777	23.97%	36560	21.56%
16-64	104207	64.41%	109295	64.44%
65+	18814	11.63%	23742	14.00%
All ages	161798	100%	169597	100%

Source: Office of National Statistics 2016 Mid-Year Trend based projections

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

Figure 3:

Ethnicity	Total	%
White British	115859	35.08%
Black African	24490	7.41%
Turkish	24153	7.31%
White Other	22796	6.90%
Black Caribbean	18306	5.54%
Greek Cypriot	16508	5.00%
Other Ethnic Group	12905	3.91%
Other Asian	12836	3.89%
Indian	11845	3.59%
Somali	9373	2.84%
Other Black	8903	2.70%
White Irish	7186	2.18%
Other mixed	6867	2.08%
Turkish Cypriot	6676	2.02%
Bangladeshi	6255	1.89%
White & Black Caribbean	4606	1.39%
Kurdish	4502	1.36%
Greek	4307	1.30%
White and Asian	3978	1.20%
Chinese	2731	0.83%
Pakistani	2653	0.80%
White and Black African	2580	0.78%

Source: Ethnicity estimates are produced in-house, using data from the 2001 and 2011 Censuses and the 2016 School Census conducted by the local education authority (LEA).

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 Other issues that may be considered such as:

- Matters of faith, including all religious or faith denominations including proximity to churches, mosques, temples or any other place of worship.

3.1.5 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.

3.1.6 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 places of worship;
- Figure 8: Map showing distribution of gambling premises and areas of deprivation;
- Figure 9: Map showing distribution of gambling premises and areas of unemployment;
- Figure 10: Map showing distribution of gambling premises and areas where residents claim working age benefits;
- Figure 11: Map showing distribution of gambling premises and areas of poor mental health;
- Figure 12: Map showing all ASB Call hotspots in Enfield between April 2017 and March 2018;
- Figure 13: map showing all recorded violence against the person hotspots in Enfield between April 2017 and March 2018.

3.1.7 If an application for a new licence or variation is submitted that is within 400 metres of premises/location where children, young persons and vulnerable persons are 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.

3.1.8 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.

3.1.9 For gathering local information, a report was produced on the number of underage gambling complaints and failed test purchases at betting shops (as carried out by an underage Trading Standards volunteer). Since 1st April 2015, two complaints but no sales have been recorded, compared to nil complaints and nil sales between 1st April 2012 and 31st March 2015.

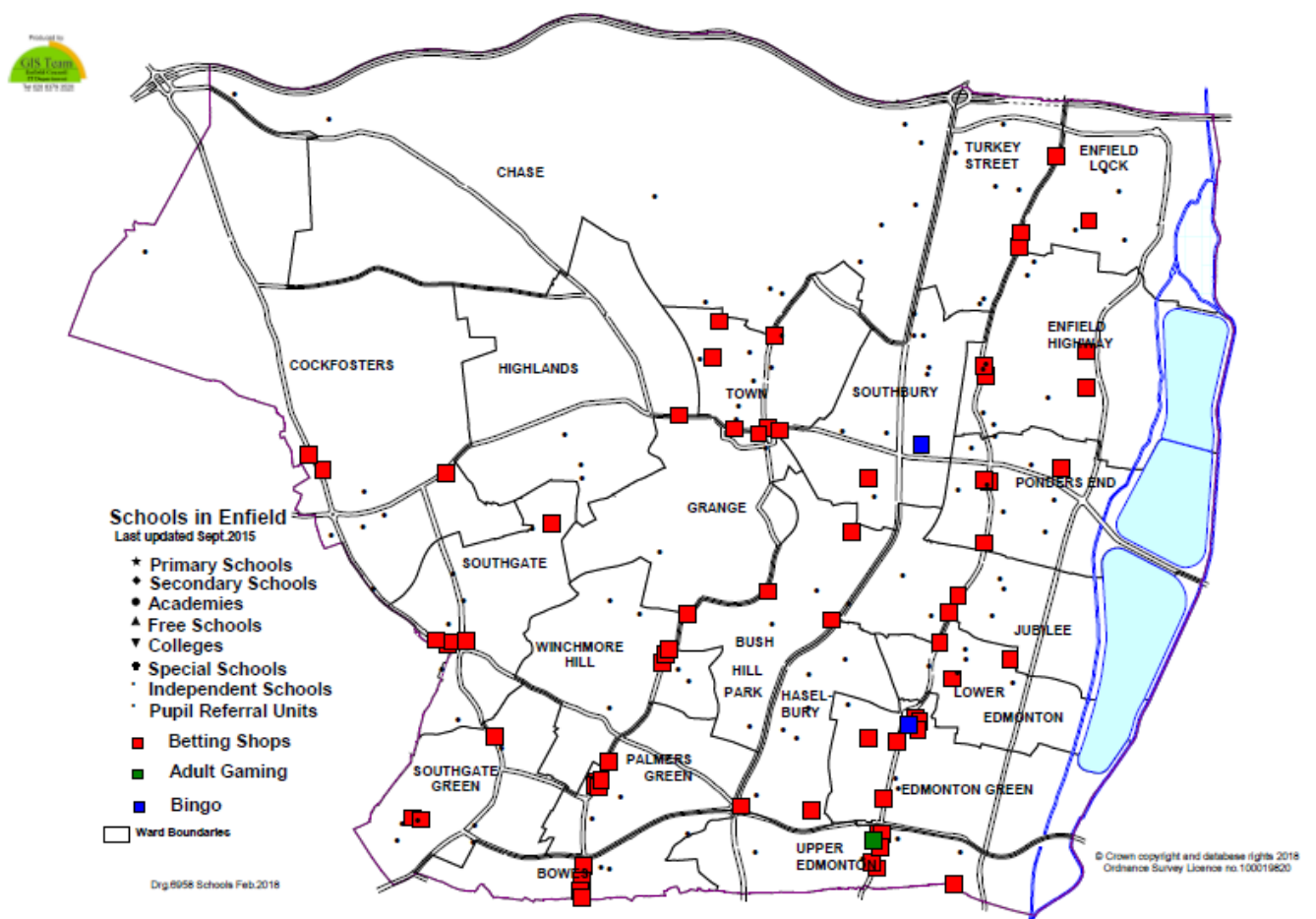
3.1.10 Council enforcement officers carried out inspections at all betting shops between 2017-2018, and were deemed to be compliant.

4.1 Local Area Profile

Disclaimer: Please note that the betting shop map positions on the maps below were drawn using the centre of their full postcode, not their precise address. Therefore, the position of a gambling premises may be closer to other points and areas than appears. The position of other points is also likely to be based on full postcodes rather than address.

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

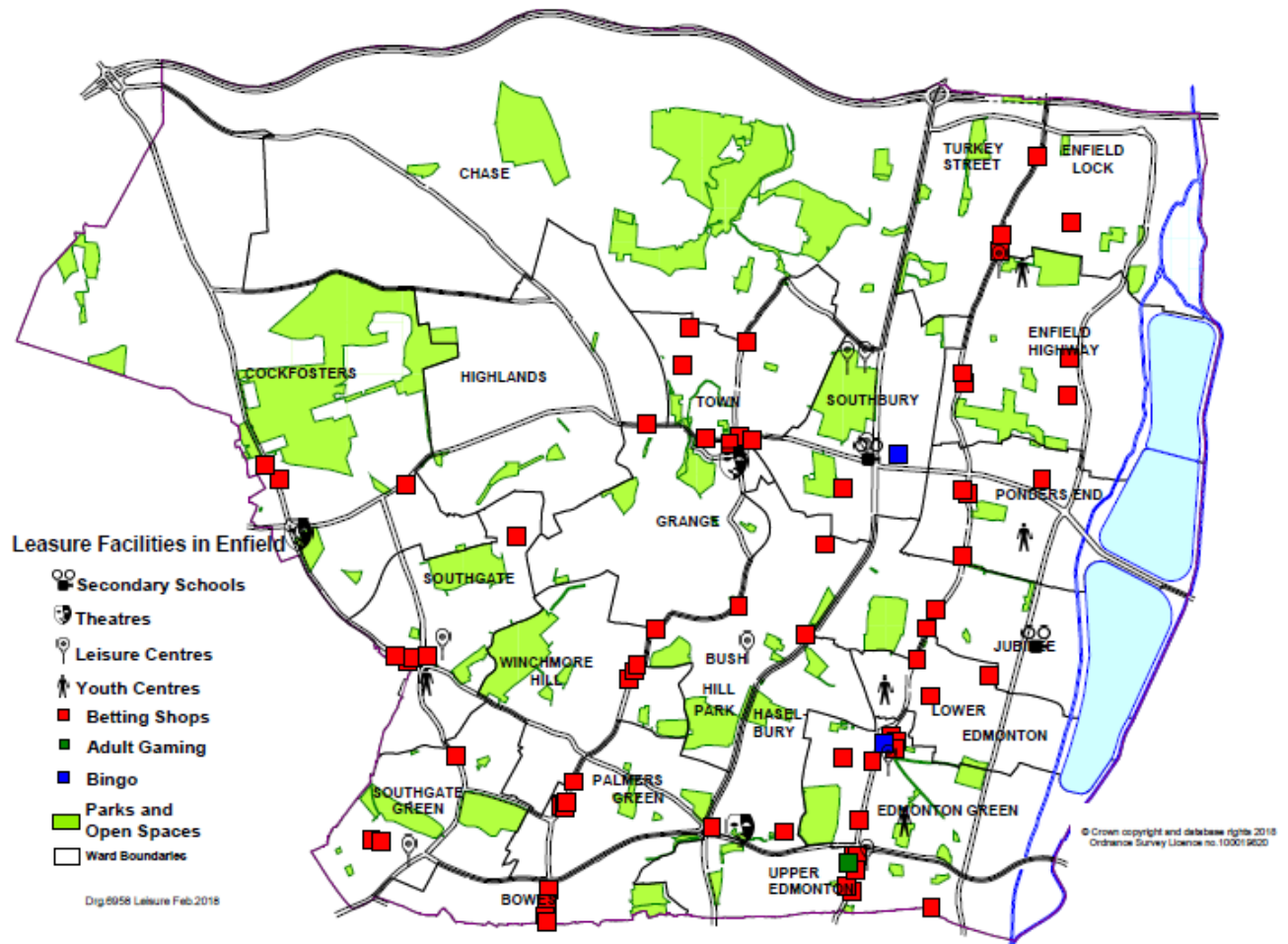
Source: Enfield Council GIS server February 2018



4.1.1 First of all, the actual distribution of existing betting 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 in Edmonton Green, 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, Southgate Green, Upper Edmonton and Lower Edmonton, they are in close proximity to the existing gambling premises.

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

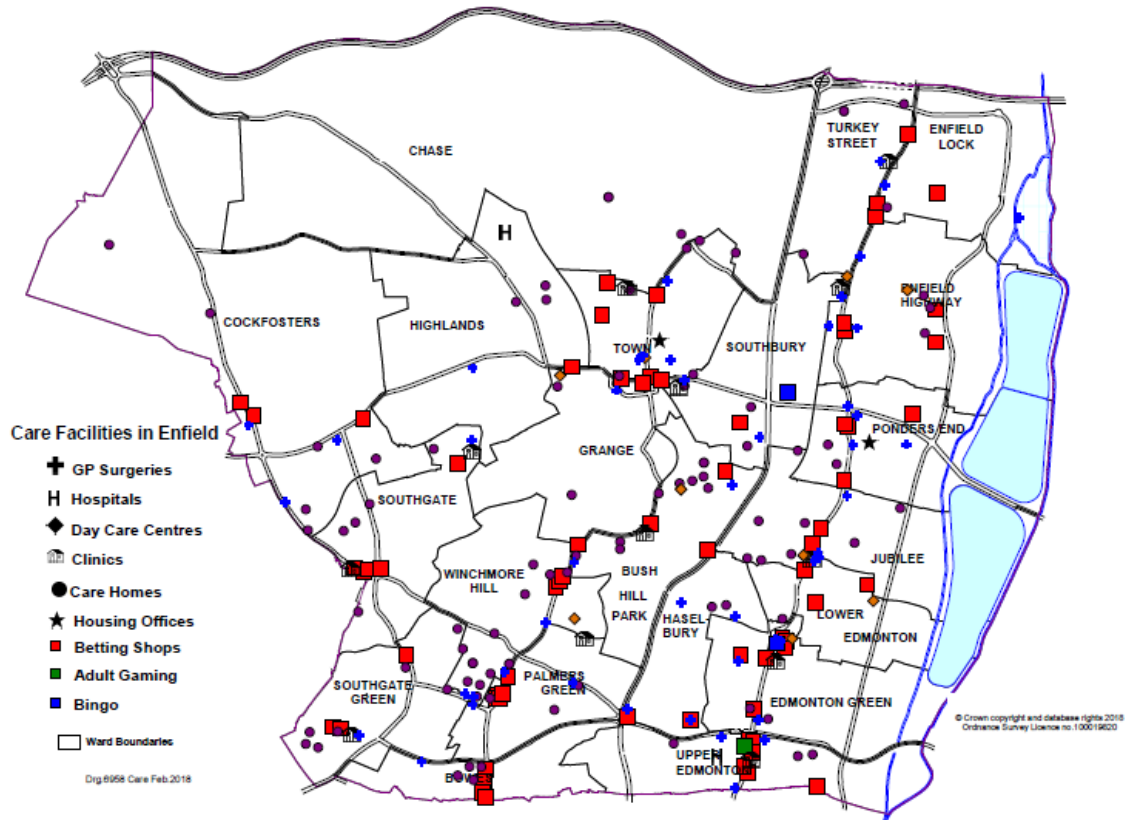


Source: Enfield Council GIS server February 2018

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. In the greater part 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 Green, and the leisure centres in Upper Edmonton, and Enfield Lock appear to be in the near vicinity.

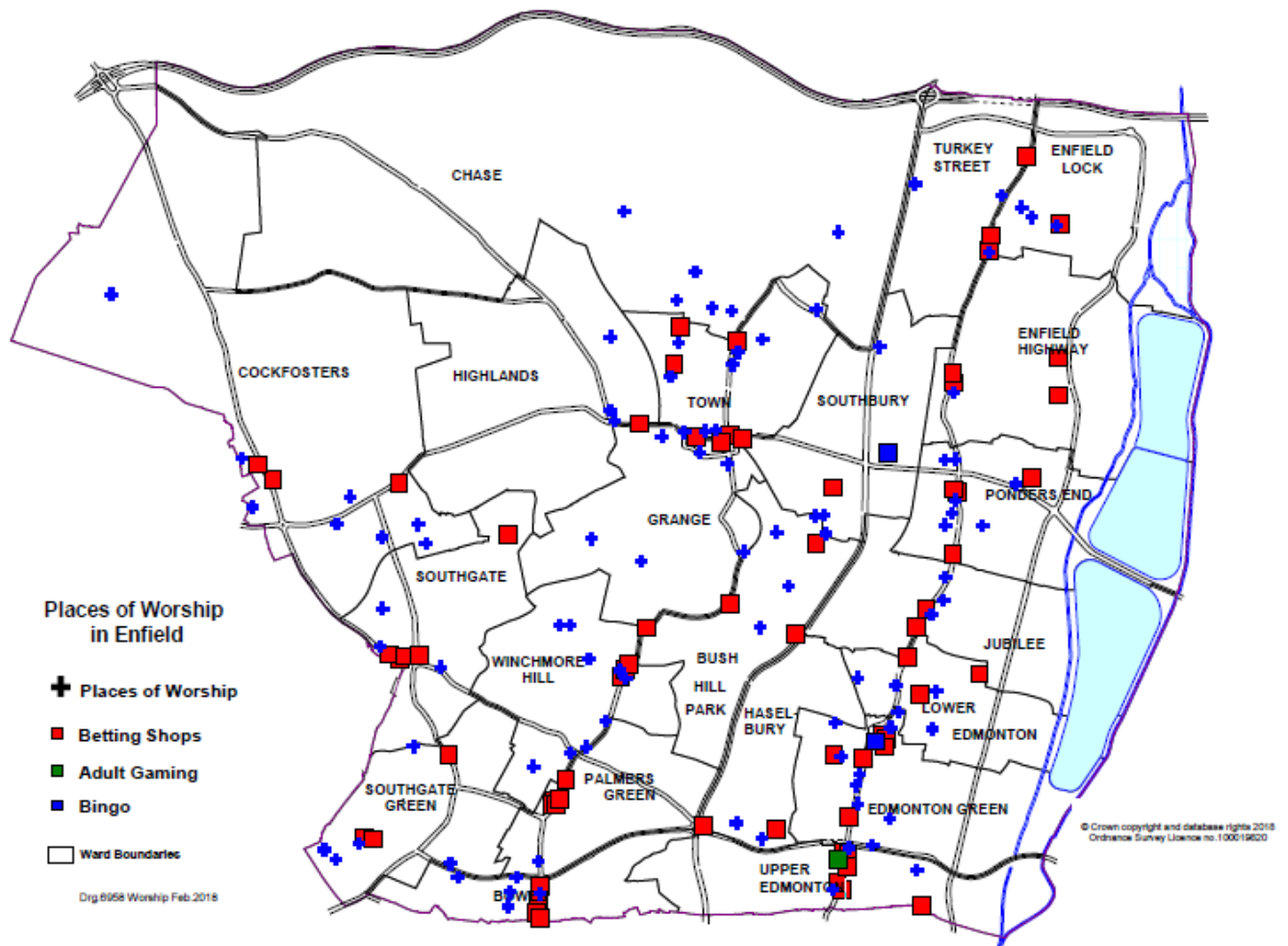
Figure 6: Map showing distribution of gambling premises and medical facilities, care homes, and temporary accommodation etc.

Source: Enfield Council GIS server February 2018



4.1.4 Figure 6 shows that there is a high volume of temporary accommodation, which is in close proximity to the existing betting shops. The map is a useful tool in identifying the areas where there are high concentrations of temporary accommodation. The clinics in Edmonton Green and in Town wards are central to the locations of the betting shops in that area. The map also identifies that there are a larger number of care homes in Palmers Green and Bowes, which appear to be relatively close to the multiple betting shops in those areas.

Figure 7: Map showing distribution of gambling premises and places of worship



Source: Enfield Council GIS server February 2018

4.1.5 The Commission's Guidance advised councils to be aware of places of worship, so they have been plotted in Figure 7, and the map shows that these are not common neighbours of existing betting shops.

Figure 8: Map showing distribution of betting shops and areas of deprivation

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Source: Indices of Deprivation 2010 (DCLG)

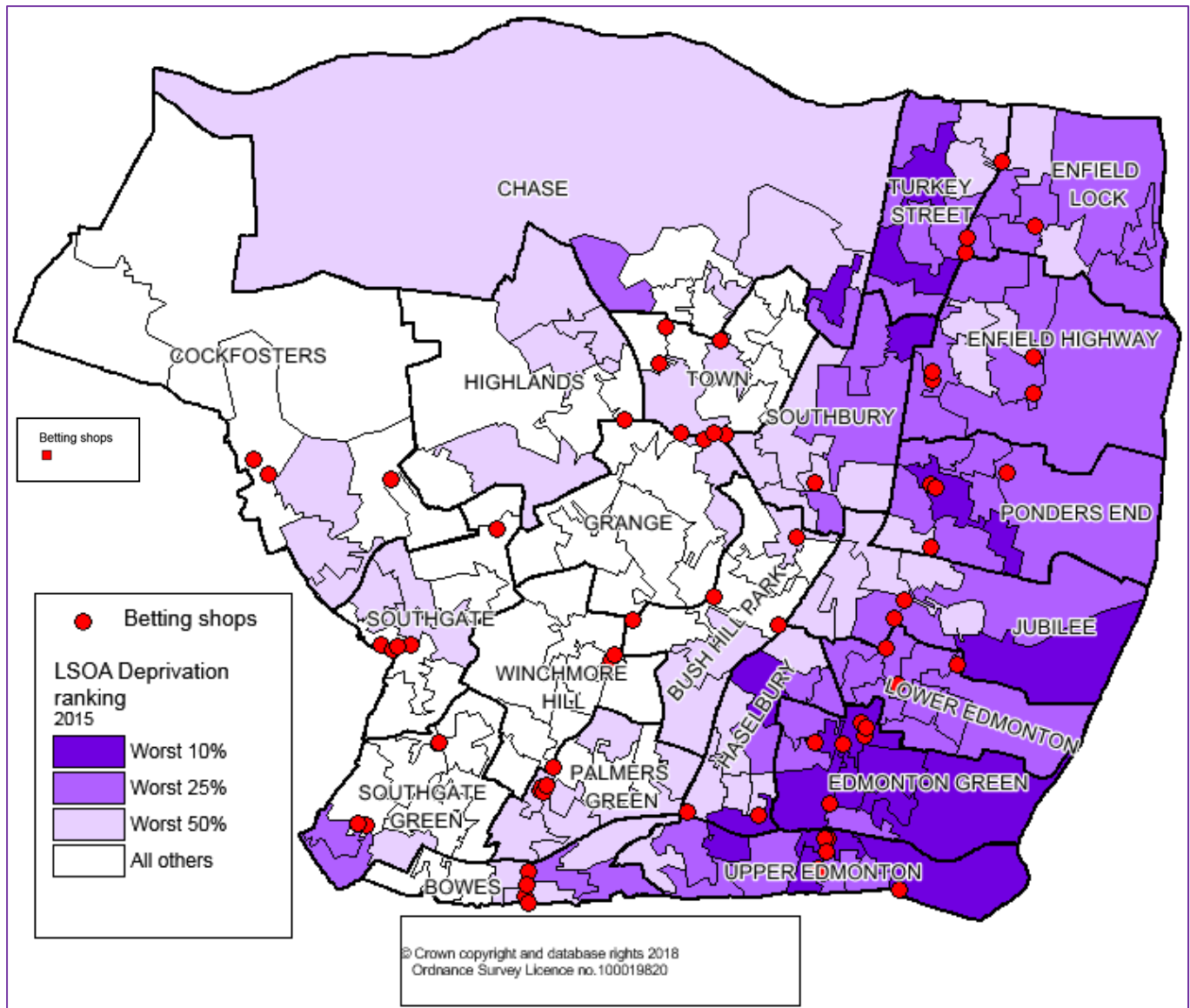
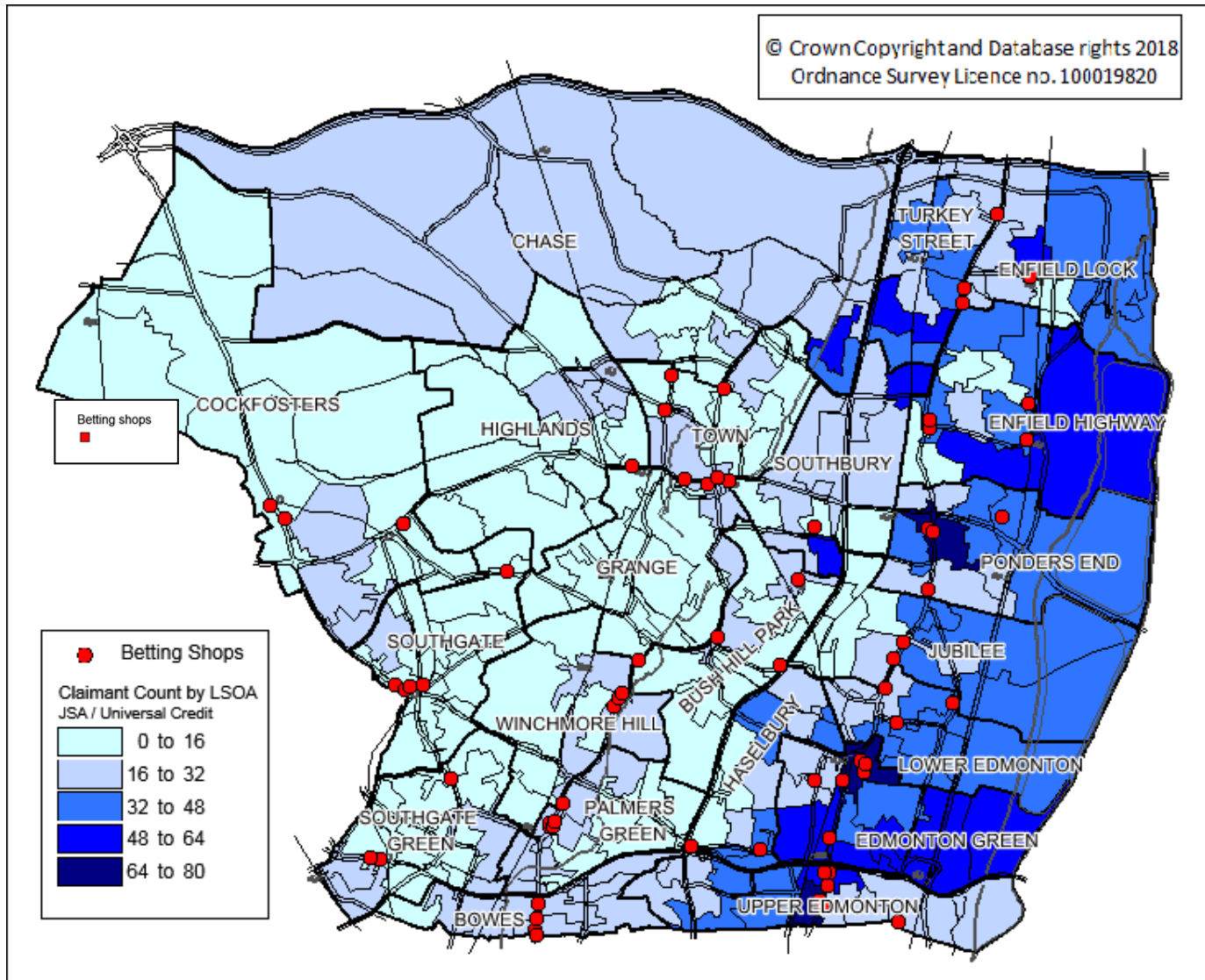


Figure 9: Map showing distribution of betting shops and areas of unemployment

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NB. JSA = Jobseekers Allowance. Key relates to actual number of people in that area

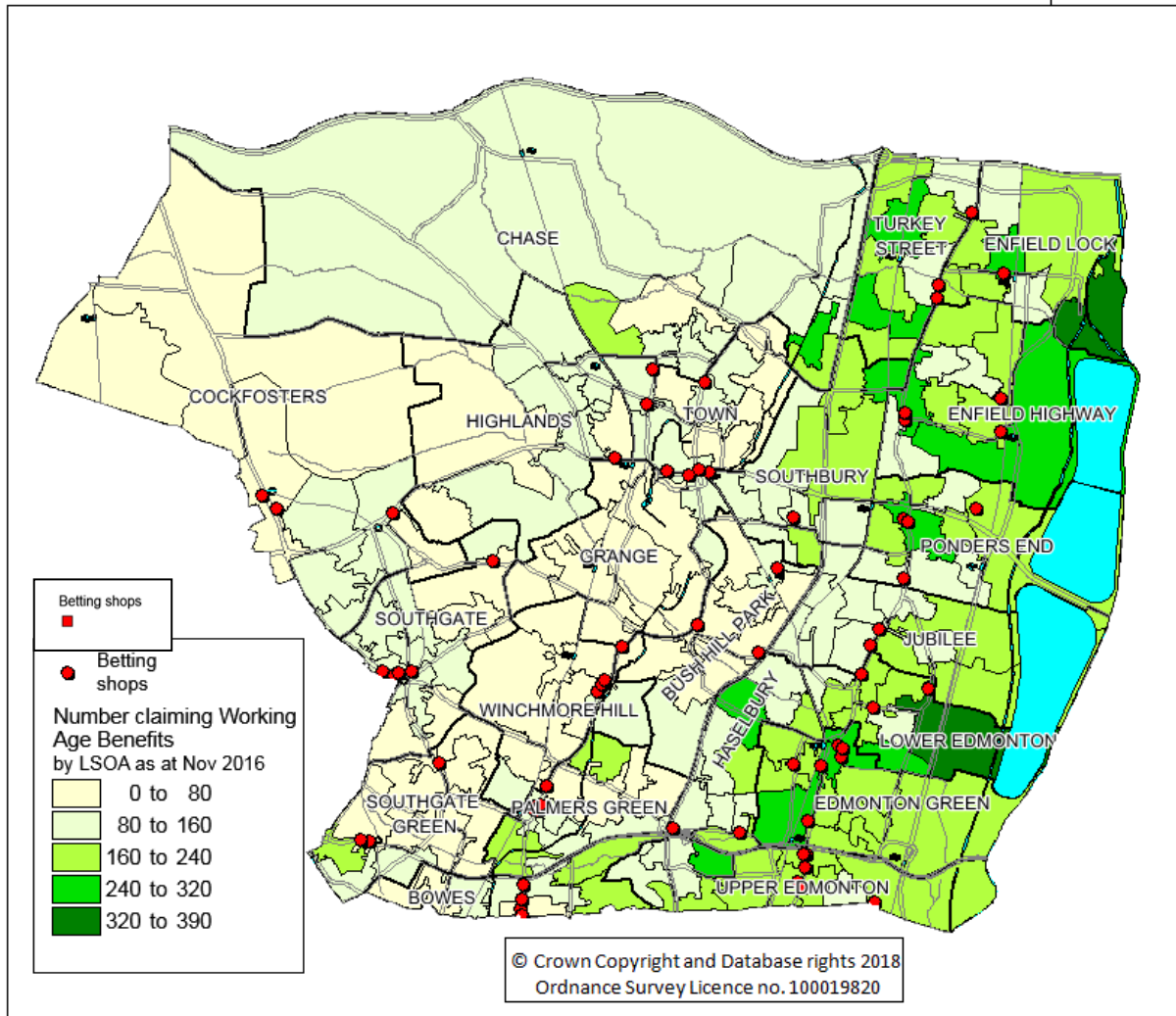
Source: Office of National Statistics; count as at May 2015, mapped by lower layer super output area



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 10: Map showing distribution of betting shops and areas where residents claim working age benefits

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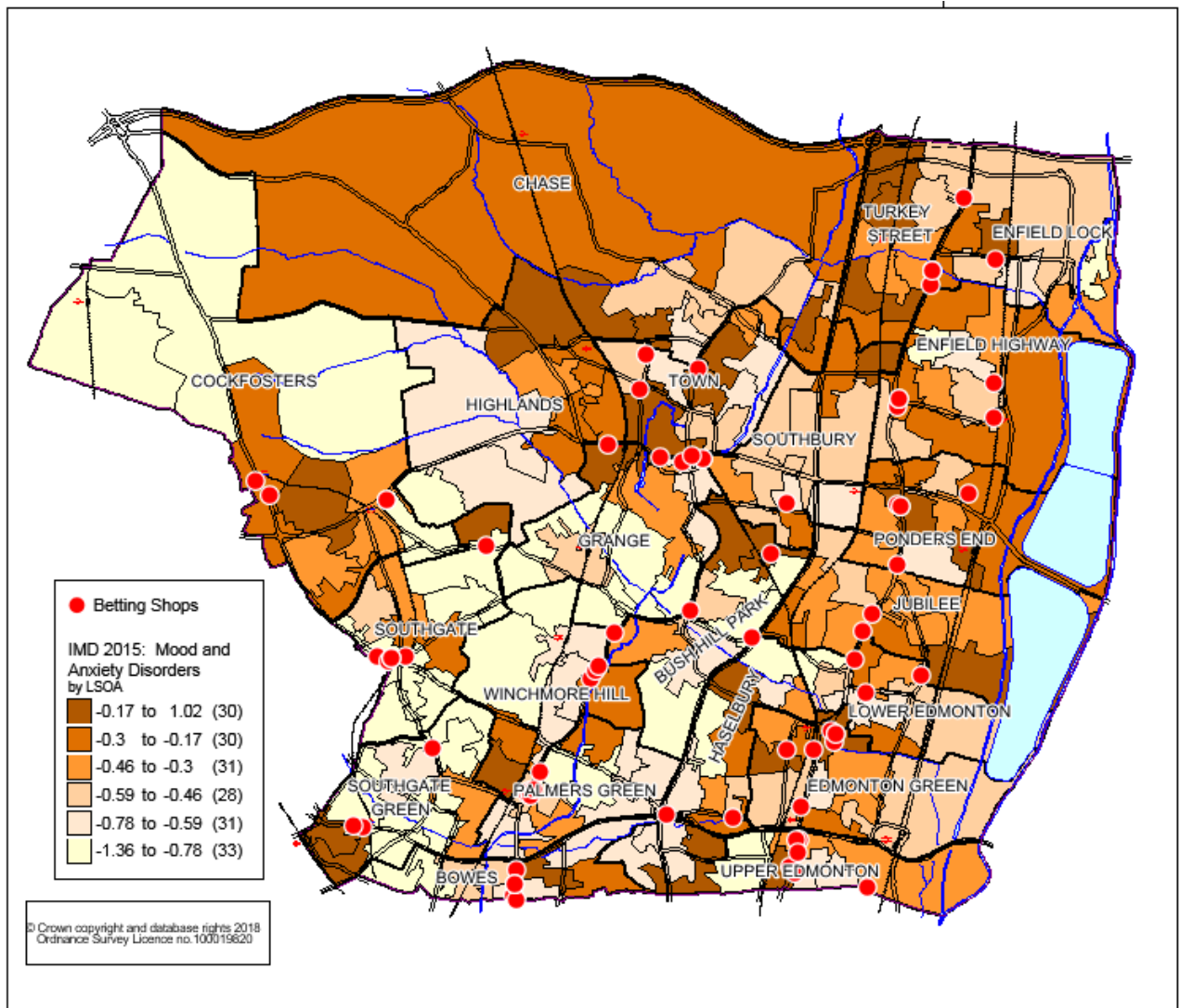
The map shows the number of people in each LSOA area (NB – old 2001 LSOA boundaries) who are claiming any of the available working-age benefits as at November 2016 (the last date for which these data were available).

Working age benefits include: Jobseekers Allowance, Employment and Support Allowance, Income Support, Carers' Allowance, Disability Living Allowance, Universal Credit (full roll-out of UC did not occur in Enfield until November 2017, so these numbers would have been small).

4.1.6 Figures 8 to 10 show maps of the areas of worst deprivation, highest unemployment rates and highest number of working age benefit claimants. 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: Map showing distribution of betting shops and areas of poor mental health

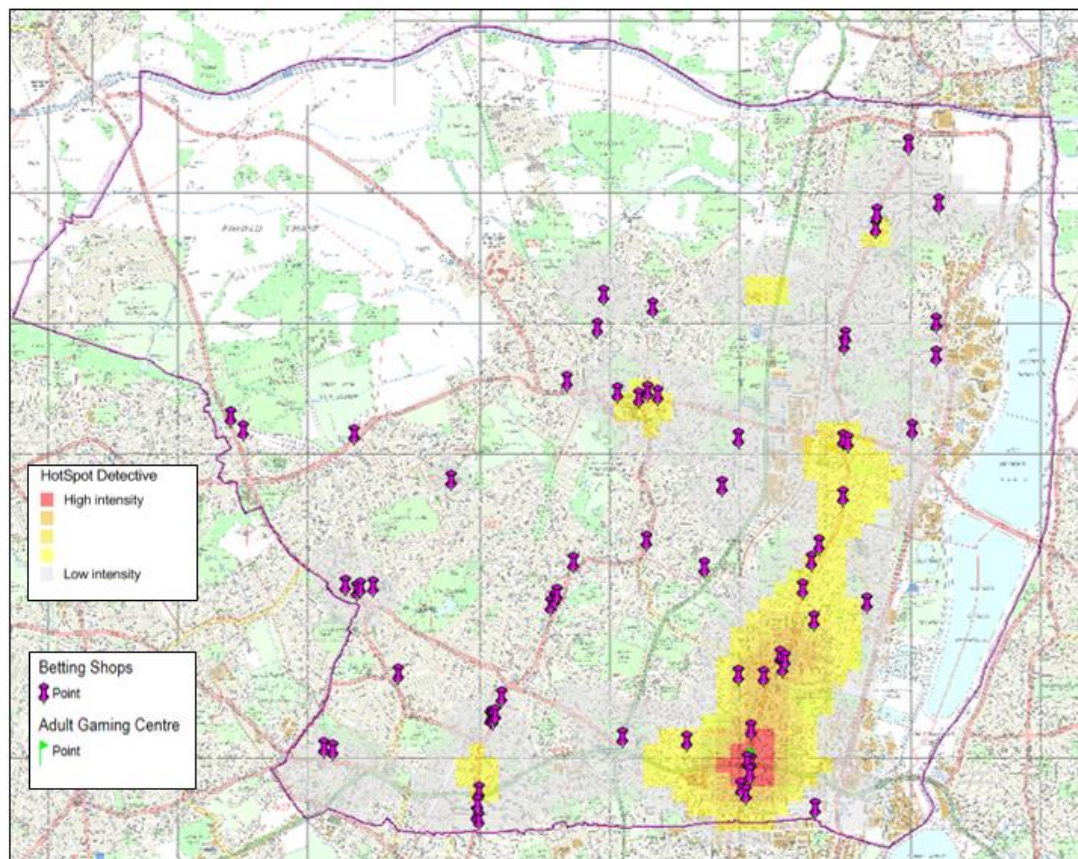
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Indices of Deprivation 2015, Health domain, Indicator: Mood and Anxiety Disorders indicator. The mood and anxiety disorders indicator is a broad measure of levels of mental ill health in the local population. The definition used for this indicator 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 © 2015, re-used with the permission of The Health & Social Care Information Centre. All rights reserved.

4.1.7 As an indication of the levels of poor mental health in the borough, Figure 11 has been produced. As the key indicates, areas range from those with the highest levels of mental health issues (dark brown) to those with the lowest levels (cream). The borough shows a considerable range, and there are pockets of high levels in the wards of Town, Chase, Cockfosters, Turkey Street, Enfield Highway, Ponders End and Upper Edmonton. With the exception of the Town ward, there are no more than two betting shops in the western wards, but significantly more in the eastern wards.

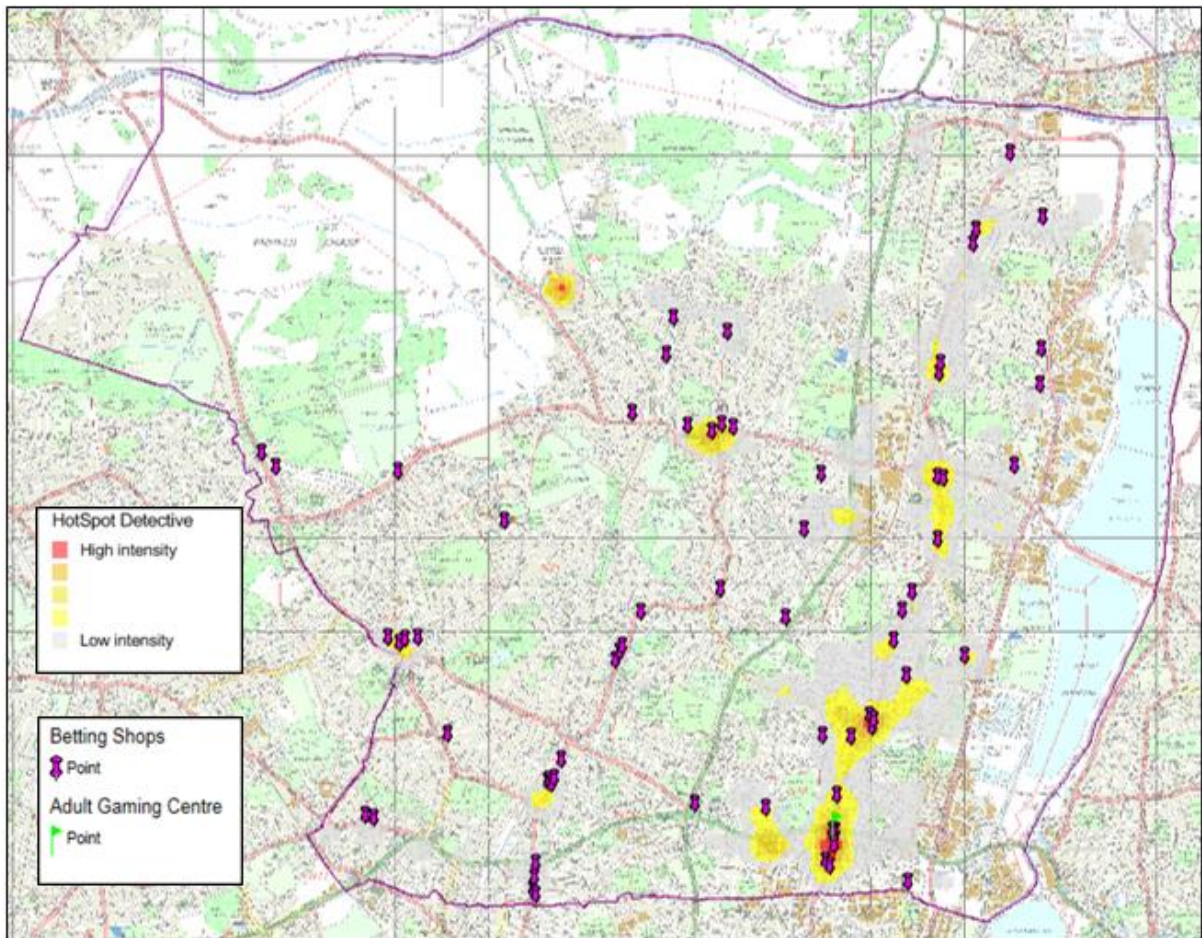
Figure 12: All ASB Call hotspots in Enfield between April 2017 and March 2018 plotted around all Betting shops and Adult Gaming Centre. (Calls include drug and alcohol ASB calls.)



Source: LBE Community Safety Unit – Metropolitan Police records April 2017 to March 2018

4.1.8 There were 126 ASB Calls to Betting Shops in Enfield during the year between April 2017 to March 2018. Of those calls only one call that was recorded as alcohol related and one call that was recorded as drug related. Most of the calls were to rowdy and inconsiderate behaviour incidents within the premises.

Figure 13: All recorded Violence Against the Person hotspots in Enfield between April 2017 and March 2018 plotted around Betting Shops and Adult Gaming Centre.



Source: LBE Community Safety Unit – Metropolitan Police records April 2017 to March 2018

4.1.9 Community Safety reported that:

- 2.3% of total notifiable offences occurred in betting shops in Enfield between April 2017 and March 2018;
- Most of offences that occurred in betting shops were criminal damage, as shown in the below chart.

Major Crime Classification	Offences Reported
Criminal Damage	74
Violence Against the Person	59
Theft and Handling	20
Other Accepted Crime	4
Burglary	3
Fraud or Forgery	3
Robbery	1
Grand Total	164

4.1.10 Figures 12 and 13 highlight similarities with the problem hot spot areas, particularly around Edmonton Green, Upper Edmonton and Lower Edmonton. It is also noted that there a couple of betting shops within the high intensity hot spot areas.

4.1.11 Community Safety provided a further overview of betting shops and crime:

- The majority of betting shops were victims of Criminal Damage (45%), followed by Violence against the Person (36%).
- The time of these offences is in line with the overall trend with 15 of the 59 offences occurring between 19:00 and 19:59.
- Also in line with overall crimes reported the numbers of reports increased in June and July 2017.