

Annex 3

Interested Party Representations

IP1 Representation: Cllr Nesil Caliskan

I have been contacted by local residents who have asked me to object to the above licence application.

I would like to submit a representation with respect to the above application because I believe it does not meet the following two objectives of the Gambling Act:

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,

This address of the proposed premises is located in an area that is an anti-social behaviour hot spot. A new gaming centre here will be a source of crime and disorder and exacerbate existing ASB and crime in the area.

This address is located in the Town ward. Town ward is among the 30% most deprived in England. This means local residents may be vulnerable to problem gambling and other risky behaviours that make people vulnerable to being victims of crime or associated with crime.

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

This address is based in Enfield Town Centre. The town centre is a community hub for children, young people and vulnerable persons who spend time and pass through the area. A gaming centre will risk them coming into harm either by the gambling activity itself or the ASB or crime that is potentially linked to the premises.

There are a number of schools in the area and pupils pass through this street to reach the bus stop or tube station.

I believe the risk assessment carried out by Future Leisure Limited does not sufficiently address the risks factors pertaining to these two Gambling Act objectives.

Please accept this email as my representation and objection to the above licence.

Regards

Cllr Nesil Caliskan
Leader of Enfield Council

cllr.nesil.caliskan@enfield.gov.uk

020 8379 3379

IP2 Representation: Cllr Michael Rye

I wish to object to this application because:

- (a) In Enfield we know there are a number of groups of individuals from particular communities who use gambling to launder the proceeds of crime and recruit gang members (evidence Met Police Enfield Council Scrutiny reports that can be provided by Democratic services OSC Crime Panel or work stream)
- (b) Gambling outside of conventional betting shops is more likely to lead to covert and addictive gambling, machines in particular are a recognized danger to habitual gamblers (evidence academic research into gambling see any number of University Professorial research)
- (c) Often gang crime seeks to recruit young people and gambling can be seen as attractive to young people and this site is passed by many school children accessing local schools in the Enfield Town area. There is also a bus stop in close proximity to this premises which will be used by young people. Crime is already associated with this area because behind the shops/flats there is an open courtyard used for drug dealing, and other inappropriate uses that would cause a public nuisance. Notices from residents telling people not sit on their stairs etc can be found. (evidence Met Police SFN Teams Enfield Council Scrutiny reports, Gangs scrutiny work stream also modern day slavery work stream)

Kind regards,

Councillor Michael Rye, OBE, BA (Hons), PGCE, FCollIP, NPQH, FHA

Town Ward

Shadow Cabinet Member for Education, Libraries and Planning

Ward Surgery Wednesdays by appointment

Telephone 02083511384

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IP3 Representation: Cllr Joanne Laban

I wish to object to this application for the following reasons:

1. Amusement Arcades increase the opportunity for money laundering. It is already known that there are a number of groups of individuals who use gambling to launder the proceeds of crime and recruit gang members (evidence Met Police Enfield Council Scrutiny reports that can be provided by Democratic services OSC Crime

Panel or work stream)

2. Gambling outside of conventional betting shops is more likely to lead to covert and addictive gambling, machines in particular are a recognized danger to habitual gamblers (evidence academic research into gambling see any number of University Professorial research).

3. The low stake gambling provided by this arcade makes gambling more accessible for those on lower incomes particularly young people and the vulnerable. This site is passed by many school children from local secondary schools in Enfield who are making their way to Enfield Town Station and using the bus stops for the many bus routes. It is an attractive place for young people to gather which makes them a target for recruitment by gangs for crime.

4. There is already a problem with drug dealing and other unwanted anti social behaviour in the open courtyard at the rear of the shops/flats. The Police Safer Neighbourhood Team is aware of the problem and has been documented at various council scrutiny work streams.

Regards

Joanne

Councillor Joanne Laban

Conservative Member for Highlands Ward

Leader of the Opposition

London Borough of Enfield

Conservative Group Office

Civic Centre

Silver Street

Enfield EN1 3XA

IP4 Representation: Enfield Town Business Association

I write on behalf of the Enfield Town Business Association to object in the strongest terms to the granting of an Adult Gaming Centre premises licence at 8 Southbury Road, Enfield Town, EN1 1YT

- Much work is being done (in conjunction with Enfield Council) to improve the image of Enfield Town and re-establish it as a safe, attractive and welcoming shopping destination for the community. Such premises will help to destroy much of this work.

- The Town is already suffering from anti-social behaviour, shoplifting, begging and vagrancy, which our overstretched local Police struggle to deal with.
- An amusement arcade will likely attract the less desirable members of society into Enfield Town, who are also the most likely to suffer from drug and gambling addictions. This would inevitably prove to be a particular problem for other businesses in the area, especially those trying to improve the evening economy.
- Enfield Town is surrounded by schools whose pupils use the Town for transport links, as well as spending leisure time in the area. Although it will be claimed that a business such as Future Leisure Ltd operate an over 18's only policy, it remains a bad example to young people, particularly in view of problems of gambling addiction in our society. I would also comment that there are school pupils and students who may be 18.
- The position of this unit on Southbury Road is on a busy and particularly narrow section of pavement and potential customers and staff loitering outside would cause congestion for other pavement users. Such venues are also frequently used as meeting points for groups of young people.
- I draw attention to the fact that a license has recently been granted for Merkul Slots on the other side of the road (1-2 St Onge Parade) and visitors entering the area from the direction of the station would be greeted by gambling arcades on both sides of the road. **This is far from the image that both businesses and leadership of Enfield Council wish to portray for our flagship town centre.**

Yours faithfully

Mark Rudling

Town Centre Manager

On behalf of Enfield Town Business Association.

IP5 Representation: Enfield Town Residents Association

I write on behalf of the Enfield Town Residents Association. Our Committee strongly objects to the granting of an Adult Gaming Centre licence to Future Leisure Ltd for the premises located at 8 Southbury Road, Enfield Town, EN1 1YT.

We object for the following reasons related to items (a) of the Gambling Act 2005, namely, the potential for gambling at this location being a source of crime or disorder, being associated with existing crime or disorder issues and/or being used to support crime; and item (c) of the Gambling Act, protecting children and other vulnerable persons from being harmed or exploited by gambling.

In relation to point a) of the Gambling Act 2005, our objections are as follows:

- The Town already suffers from anti-social behaviour, shoplifting, begging and vagrancy, with all of these being regular subjects of complaint at Grange

Ward Forums and CAPE meetings. It is a matter of some concern therefore that as our local Police struggle to contain existing crime, this company plans to open an establishment that is likely to exacerbate crime rates. This is not mere conjecture or supposition: an investigation by the Universities of Lancaster and Glasgow found that 7.3 per cent of male prisoners surveyed considered that their current offence was linked to gambling; and 11 per cent of men linked gambling to past offending, as did 12 per cent of female gamblers.

- Thefts from vehicles is another frequently-reported crime, and given that those addicted to gambling are likely to be in search of sources of funds, these offences too can be expected to increase;
- Officers can hardly be unaware, too, that community patrols have been in place within and around the Town and Southbury Road for around two years because of the large numbers of robberies from mostly, but not solely, young people. The establishment of a gambling centre can only serve to increase this problem as people seek sources of funds.
- Such establishments attract large numbers of young males. The location concerned is situated on a particularly narrow section of the pavement close to the pedestrian crossing for the station. It is to be expected that customers and staff of the arcade will gather outside the venue smoking, thus causing congestion problems.
- While for many this will constitute a general but perhaps not significant nuisance, for lone females walking home in the late evening or at night this is particularly likely to increase their feelings of vulnerability, as they have to pass crowds of young men on a particularly narrow section of pavement. Similar considerations apply to schoolchildren and those in wheelchairs making their way along the road and/or to and from the station.
- Given the readily-predicable problem of loiterers outside the establishment and their impact on clearance for pedestrians, in particular lone females and wheelchair users it is far from clear that any appropriately rigorous accessibility audit has been carried out prior to granting the application.
- Furthermore, for visitors entering the area from the station, to be greeted by a gambling arcade (potentially, two, if the Merkur Slots licence is allowed to go unchallenged) is far from the image that both businesses and leadership of Enfield Council are currently attempting to portray for our flagship town centre. LBE Licensing officers must surely be aware that Enfield Council is currently attempting to improve the image of Enfield Town and re-establish it as a safe, attractive and welcoming shopping destination for the community. The introduction of a gambling establishment is hardly likely to support such a perception, and regrettably is more likely to attract both vulnerable and criminal sections of society into Enfield Town.
- Such venues are known to encourage the development of gambling addiction, sadly amongst those least able to afford to lose money. The types of clientele such a venue will attract are, far from improving the area, more likely to

increase problems for other businesses in the area, especially those trying to improve the evening economy.

Under point (c) of the Gambling Act our objection is as follows:

- We note the intention to restrict access to those aged over 18, but would point out that a significant proportion of young people turn 18 in their final year at school; Enfield Town is surrounded by schools whose pupils use Enfield Town station for transport links, as well as spending leisure time in the area. Although it will be claimed that the business operates an over 18's only policy, it remains a bad example to young people, particularly in view of problems of gambling addiction in our society, with the strong likelihood of some being lured into a lifetime of gambling addiction as a consequence.

For the reasons stated above we strongly object to this application.

IP6 Representation

Please accept this email as a formal objection to the proposals for the NEW ADULT GAMING CENTRE: Future Leisure Limited, 8 Southbury Road, Enfield, EN1 1YT.

I object on the grounds of the central location, between two large secondary schools in the immediate vicinity, which directly contravenes the licensing objectives under the Gambling Act 2005, i.e. (c) protecting children and other vulnerable persons from being harmed or exploited by gambling. Slot machines and other such 'games' are specifically targeted towards a younger demographic. Enfield Town is increasingly full of young families and young adults - this venue is completely inappropriate for the proposed location.

Mid- and post-pandemic, Enfield town centre is likely to experience further shop closures. The town already has two gambling locations. There is no need for further venues which have been proven to exploit those in most financial need. Such venues are harmful to the fabric of the town and contribute nothing to the positive regeneration that Enfield Council has promised for the town centre. The Council has promised to take steps towards encouraging a 'night economy' with restaurants and bars etc. - such a venue is likely to deter visitors from coming to Enfield Town.

IP7 Representation

I write as the leaseholder of Upstairs Downstairs Hair Salon Limited, 10 Southbury Road, to object in the strongest terms to the granting of an Adult Gaming Centre premises licence at 8 Southbury Road, Enfield Town, EN1 1YT.

- Much work is being done (in conjunction with Enfield Council) to improve the image of Enfield Town and re-establish it as a safe, attractive and welcoming shopping destination for the community. Such premises will help to destroy much of this work.

- The Town is already suffering from anti-social behaviour, shoplifting, begging and vagrancy, which our overstretched local Police struggle to deal with.
- An amusement arcade will likely attract the less desirable members of society into Enfield Town, who are also the most likely to suffer from drug and gambling addictions. This would inevitably prove to be a particular problem for mine and other businesses in the area, and make for a feeling of unease whilst open especially when the nights draw in and are much darker earlier.
- Enfield Town is surrounded by schools whose pupils use the Town for transport links, as well as spending leisure time in the area. Although it will be claimed that a business such as Future Leisure Ltd operate an over 18's only policy, it remains a bad example to young people, particularly in view of problems of gambling addiction in our society. I would also comment that there are school pupils and students who may be 18.
- The position of this unit on Southbury Road is on a busy and particularly narrow section of pavement and potential customers and staff loitering outside would cause congestion for other pavement users. Such venues are also frequently used as meeting points for groups of young people. Many of my clientele are older and more vulnerable and would be put off from coming to my business if such intimidating groups were gathered outside.
- I draw attention to the fact that a license has recently been granted for Merkul Slots on the other side of the road (1-2 St Onge Parade) and visitors entering the area from the direction of the station would be greeted by gambling arcades on both sides of the road. This is far from the image that both businesses and leadership of Enfield Council wish to portray for our flagship town centre.

As a female business owner with several members of female staff I strongly object to this proposal as I feel that both myself and my staff members' safety would be severely compromised.
