Interested Party Representations

IP1 Representation

I wish to express my concern regarding the granting of a 24 hour gambling licence to Merkur Slots on Green Lanes in Palmers Green.

Firstly, residents had little opportunity to appeal against the application initially as it was posted during lockdown and in the run up to Christmas so giving little chance for it to be seen. In addition to that it was a very small notice, so likely to be missed at the best of times.

Secondly, Palmers Green does not need any more gambling/betting shops (we have two Labrokes, one Betfred and one Paddy Power), especially one so close to two pubs, as this seems to attract additional trouble. I have observed on several occasions a group of inebriated men venturing from the nearby Wetherspoons pub (the Alfred Herring), to the Paddy Power betting shop next door, and I am positive that gambling whilst drunk is unsafe, so if a 24 hour gambling arcade opens a few doors down that would be even more of a temptation. There is also the Wishing Well pub a few minutes walk away from the proposed site with drinkers who too could be tempted by a gambling arcade. Gambling addiction has become a big problem in recent years and such places will only make it worse.

The arcade could also attract young people because of the bright lights and machines, and while the establishment is meant to be for those over 18, many of them can probably get around the age requirements by producing fake ID as they do when they enter pubs (I know first hand that this happens on a regular basis). The arcade is also likely to be very attractive to vulnerable adults who may have difficulty in controlling their expenses.

One final point is the effect it will have on the area in general; like many other high streets, Palmers Green has suffered with many shops being shut down even before the pandemic hit, so I strongly feel that the opening of a 24 hour gambling arcade will bring down the appearance of the area further still. It could also increase poverty amongst people who have lost money or their business as a result of the pandemic, and who could be tempted by the arcade as a way of making some money.

I sincerely hope you agree that such an establishment is totally undesirable, and will only add to the decline of the area plus the number of jobs it would generate is likely to be negligible.

IP2 to IP45 Representation (Identical representation submitted)

I am writing to object to a 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green, High Street, 292-292A Green Lanes, N13 5TW As a local

resident, I feel strongly that the license granted in January this year was morally irresponsible and should be revoked immediately. I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, and criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. People will be able to leave the local pubs at closing time and move to the nearby gaming arcade to start gambling. The antisocial behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

2) protecting children and other vulnerable persons from being harmed or exploited by gambling This type of venue is totally unsuitable in this area with a large number of growing families and elderly. Two schools sandwich the part of our high street in question and there is a school bus stop right outside this venue. There is also a McDonalds very close by where youths congregate. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers - and to the risks of antisocial behaviour linked to betting 24/7 - while en route to school, to the nearby park, playgrounds and local shops.

Palmers Green ward is one of the top 40% of most deprived wards in the country. We witness homelessness and begging. Town centres should not be places where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue.

3) Public health dangers

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

Please do not allow this venue to open here. I insist the Council has the moral imperative to revoke Merkur's licence and allow our local community to thrive.

IP46 & IP47 Representation

I strongly object to the granting of a licence to Merkur Slots for a 24-hour Adult Gaming Centre at 292-292A Green Lanes.

I live just off the high street and shop there frequently, but was unaware of the licence application due to the Covid restrictions which were in place at the time it was advertised.

My objections are as follows:

Gambling can be a source of crime and antisocial behaviour. Palmers Green is a family-oriented community and great efforts are being made to regenerate and improve the busy high street. A 24-hour gambling centre would be highly detrimental in this context and would devalue rather than enhance the high street.

There would be a damaging impact on vulnerable adults, children and young people. The risks to these groups include addiction, mental health issues and suicide, domestic violence and family breakup, homelessness, and severe financial hardship. In the same area there are already several betting shops and a pawn shop, the presence of the latter indicating that there are already people suffering hardship in this community. A 24-hour gambling centre risks preying on these groups and worsening their situation.

The proposed premises is opposite a central bus stop, close to McDonald's and local schools. The area is always busy with young people at the end of the schoolday, who should not be exposed or introduced to a gambling environment.

I do not believe that the local population has been consulted adequately, due to the pandemic. The application was advertised at a time when people were being urged to stay at home and shops were closed.

Thank you for listening to my concerns.

IP48 Representation

I am writing to you in relation to the baffling decision by Enfield Council to grant permission for a Casino, owned by *Merkur Slots*, to operate on 292 Green Lanes in Palmer's Green. I am sure that you are aware of the strength of feeling in the local community regarding this issue.

There was very limited opportunity for any serious public consultation on this proposal. At the time there was a nationwide stay at home order in place, preventing people from engaging in the decision making process. Having spoken to a number of my neighbours along Hazelwood Lane, many have said they would have engaged if they had been given the opportunity. The fact that we were unable to leave our homes meant that we couldn't see the licence application notice, and as such were

not given an opportunity to voice our concerns. Putting something as controversial as a 24 hour licensed casino into a residential area during a global pandemic is underhand and sneaky at best. At worst this is morally repugnant and a deliberate attempt from *Merkur Slots* to avoid democratic scrutiny.

You may be aware of a petition that was been launched regarding this issue. After only 6 days, **3100** people have signed this petition through <u>Change.org</u>. **3100** people equates to **20% of the population of Palmer's Green.** (The total population of the ward was estimated at 15,837 in 2019) Presumably this is over a quarter of the people on the electoral role for the area meaning that, by this measure, more than one in four people strongly object to this proposal, after less than a week. I'm sure that these numbers will rise in the following days but this does provide a strong sense of the disbelief and anger from local residents. Here is the link to the petition; <<u>https://www.change.org/p/to-the-leader-of-enfield-borough-council-no-to-merkur-slots-in-palmers-</u>

green?recruiter=477981914&utm_source=share_petition&utm_medium=twitter&utm_campaign=psf_combo_share_initial&utm_term=psf_combo_share_initial&recruited_by_id=10ca6900-c61d-11e5-93fe-d95df53c6b75>;

There are two schools within a 0.2 mile radius. (St Anne's Catholic Girls School and Hazelwood Junior School) and the proposed site is almost located directly behind a bus stop that school children regularly use. Gambling establishments of this nature are nearly always detrimental to the local area in terms of anti-social behaviour and the associated activities that accompany them. I myself have been verbally abused outside of Paddy Power, so I shudder when I think of the potential ramifications for parents and school children in what is a family area. Large numbers of impressionable young children regularly congregate outside of McDonald's which is only a few shops along from the proposed site. This, combined with the fact that there are already a high number of gambling shops operating on Green Lanes is something that is very concerning for residents at a time when we are looking to rejuvenate our High Street.

My colleagues have raised the fact that a number of similar schemes have been overturned by pressure from the local community, specifically Thornton Heath Council, which in February 2019 overturned an application from Luxury Leisure after 1000 residents voiced their disapproval. Equally Harringey council refused an application from Merkur slots over similar concerns.

I am asking that Enfield Council reconsider this controversial decision. At the very least there should be a further period of consultation with the local community. I look forward to hearing your response on this matter.

IP49 Representation

I am writing to object to a 24 hr Adult Gaming Centre to be opened by Merkur Slots in Palmers Green High Street.

As a local resident I object on the ground of 1) preventing gambling from being a source of crime/disorder, being associated with crime or disorder or being used to support crime.

We do not need another gambling centre given there are already four other betting shops in close proximity. There are concerns about money laundering/criminality / anti social behaviour.

I object on the ground of 2) protecting children and other vulnerable persons from being harmed or exploited by gambling This type of venue is totally unsuitable in an area where two schools are in close proximity and a school bus-stop is outside the proposed venue. A McDonalds is also close by where school children already congregate.

I object on the ground of 3) Public Health dangers Gambling is related to serious mental health issues with an increase in NHS gambling clinics for 13-25 yr olds who are suffering from addiction. A gambling arcade on the High Street can only exacerbate this problem for local families.

The local community has worked hard with both businesses and Enfield council to help rejuvenate our High Street. A Gaming Centre would not contribute in any way to achieving this goal.

I am therefore asking that these objections are taken into account when reviewing this Licence and that it is revoked on the above grounds.

IP50 Representation

I am writing to object to the twenty-four hour gaming centre being open by Merkur Slots on Green Lanes Plamers Green.

As a local resident I feel strongly that this gaming centre would be very detrimental to the area and the license should be revoked.

I object on the grounds of:

1) Sufficient notice not given to the local residents about this gambling centre.

An A4 notice on the proposed premises is definitely insufficient notice. During world wide pandemic the country was under

a strict lockdown. Law abiding citizens were following the government advice to stay at home and many were working from home.

It would be very unlikely that any people would see this notice. The local paper is not delivered to homes any longer. So the licence was

literally given without public consultation. It is unethical that during a pandemic Merkur Slots used this tragic time to get a licence to 24 hour

gambling centre. They must have been aware with proper consultation there would have been a public outcry.

2) At a time when the high is really suffering and local businesses are struggling Enfield council needs to encourage shoppers to the high street.

A gambling a centre like this would definitely discourage most people from visiting the high street, causing more hardship for local businesses.

3) Palmers Green is an area with large number of growing families and there are two schools nearby (Hazelwood and St Annes) and there

is a McDonalds nearby where families and young adults congregate. It is a real concern that the children will be exposed to gambling and see it as a normal part of life.

4) Gambling would lead to an increase of crime in the area. Needless to say gambling can be addictive which can lead to petty crime, serious mental health issues, suicide, debts, domestic violence and can destroy families.

IP51 Representation

I am writing to express my sincere concern at the prospect of Merkur Slots being given permission to open a Slot Arcade in Palmers Green High Street.

In the last three years, local residents have gone to great lengths to improve the ambience of the High Street by regular litter and clean up campaigns, removing stickers from shop walls, providing planters and trees for the outside of shops, the maintenance and planting of flower beds, commissioning wall art for the community to enjoy and encouraging new retailers to our High Street.

In fact the Leader of Enfield Council addressed a meeting attended by many local residents expressing her and the Council's interest in reviving Palmers Green High Street a couple of years ago. My husband and I both attended.

The addition of a 24 hour Slot Arcade is completely at odds with these aims and would add no benefits to the community - in fact quite the opposite.

There are two local schools very close to the premises and the students would be exposed daily to the negative impact this would have on the High Street.

It is well documented that gambling is a source of crime and disorder and the combination of an arcade very close to a Public House, namely Wetherspoons Alfred Herring, cannot be a positive combination. Gambling can have negative effects on the lives of children, families and vulnerable individuals often leading to mental health issues and financial worries.

The opportunity to object to this application is welcomed as COVID restrictions prevented us from being aware of it. Such lack of consultation due to the pandemic cynically enabled Merkur Slots to slip this in under the radar.

As soon as I became aware of this in the early weeks of 2021, I wrote to Carolyn Harris and to our local MP Bambos Charalambous to outline my concerns.

It is worth noting that the Leader of the Council, our MP and local councillors are strongly opposed to this application.

I urge you to withdraw the permission earlier granted and thus prevent what can only be a millstone around the neck of the community of Palmers Green.

IP52 Representation

This is to express my opposition to the opening of another gambling premise in Palmers Green.

Such venues encourage behaviour that has a negative effect on individuals, families and communities. It's is well known that gambling is a source of crime/disorder and I am concerned about the 24-hour element of the licence, which will make it difficult to prevent a trend and behaviour damaging the society, well being and image of our high street.

Important also to note that the Merkur Slots are close to two schools and a heavily used bus stop.

IP53 Representation

Merkur slots will be no addition to Palmers Green High Street. The possibility of it being open 24hrs is truly shocking. Gambling preys on the most vulnerable in society with school children walking past as there are at least two schools just off the high street. We want to improve the high street. Who will it bring to the neighbourhood, hardly the high rollers of Vegas. More likely frustrated customers committing petty crime kicking in shop fronts as the camera /electronics shop reported to me when the previous gambling shop was there.

There are lots of gambling premises already and not really a night time economy I object to the licensing of merkur slots

IP54 Representation

I feel strongly that such a premises will be extremely detrimental to the community.

 Impact on crime and disorder in the area: Presence of gambling premises can lead to an increase in crime in the area. A report by the commission on crime and problem gambling, published by the Howard Leage for Penal Reform in 2020 (https://howardleague.org/wp-content/uploads/2020/05/Crime-and-problem-gambling-research-landscape.pdf) shows evidence from across the globe that a high percentage of criminals have issues with gambling. I quote from the executive summary:

- "There is a clear relationship between disordered gambling and crime, with high prevalence rates of crimes being committed by people in order to fund their gambling (Williams et al, 2005)
- A wide variety of crimes are committed as a result of gambling addiction; not just 'white collar' crimes such as theft and fraud, but also crimes that occur in public spaces such as street robbery. There is significant evidence of domestic abuse and child neglect linked to problem and pathological gambling (Breen et al, 2013; Cuadrado and Lieberman, 2011)
- There is a complex interplay of causes of crime linked with the causes of disordered gambling. Cross-addictions, mental disorders, impulse control disorders and difficult life events all may play an additional role in the causation of crime and inhibit treatment (See for example: Lahn, 2005; Sundqvist and Rosendahl, 2019; Templer et al, 1993; Turner et al 2007)
- Certain demographics are more likely to commit crimes, in addition to having increased vulnerability to gambling addiction (Perrone et al, 2013; Turner et al, 2017)
- The more complex, prolonged and persistent the gambling problem, the more likely that a crime will be committed and, indeed, that many crimes may result (Turner et al, 2009; Perrone et al, 2013)
- There has been a growing understanding that gambling addiction is a behavioural disorder, however, little of this has been translated to sentencing; problem gambling is not considered to be a mitigating factor in sentencing in the way mental health problems or drug and alcohol addiction are (Folino and Abait, 2009)
- Whilst not always imprisoned as a direct result of problem gambling,
 there are extremely high rates of gambling addiction amongst prisoners.

The research suggests that prisons only offer limited treatment in any of the jurisdictions covered. Research suggests that the rate of problem gambling is higher among male and female prisoners in prison, compared to the general population. Problem gambling is markedly higher amongst women than in the general population (as reported in Finnish research by Lind and Kääriäinen, 2018 and Australian research by Perrone et al, 2013)"

This evidence makes it clear that offering extended opportunities to gamble is likely to increase opportunities for gamblers to develop problem habits, and increase the likelihood of crimes being committed.

- 2. Impact on Children and Vulnerable Adults: Palmers Green is a residential area, with housing and two schools located in very close proximity to the site. Many school children also travel by bus to and from other local schools, disembarking at the bus stops close to the proposed site. There children are at risk of being victims of crime, carried out by customers of the proposed establishment. They are also at risk of seeing gambling as a normal behaviour why else would there be shops on the high street offering gambling? As I am sure you are aware, homelessness and begging are increasing in Palmers Green. It seems likely that the provision of a 24 hour establishment, which is warm will be attractive to homeless and other vulnerable people increasing the likelihood of them becoming problem gamblers.
- 3. Lack of Adequate Consultation: Public consultation on this application was advertised via a sign on the high street, during a period of lockdown when we were not supposed to leave our homes for unnecessary purposes. Like most of our community, my family and I stayed at home and did not go to the high street, instead we used online shopping. I believe there was also a notice in a free local paper which has not been distributed to houses in this area for several years. It may have been available in local shops however see my point that most people were obeying government and local authority guidance and not leaving home to see it in shops. It seems clear that this was not adequate public consultation I cannot believe that the panel would claim it was.

I understand the above points are the only official elements you can consider in this licensing review. However I would ask that you try and also consider the general character of Palmers Green High St. The quality of the street is deteriorating as many shops close. Community groups are doing everything they can to improve the

high street, through planting, family events and more. Several pleasant cafes have opened.

However we need more attractive shops and cafes and community spaces to be available, so that local people will be encouraged to visit the high street. More and more of us will be working from home in future, so there is an opportunity to facilitate businesses that will serve these home workers, and be attractive to them. The council could have an opportunity to invest in facilities that will encourage people to visit - consider a hub for start up businesses, a food market for local crafters and food producers, a community and performance space for groups who can no longer use the Intimate Theatre or the Dugdale Centre. There are lots of possibilities. If the high street is given over to more gambling shops - as if you approve this one, then more may try to open, then it will not be attractive for the local residents to visit, and the opportunity to improve our local high street will be gone.

Thank you for reading.

IP55 Representation

I would like to submit to your attention my representation against the Gambling Premises Licence for 292-292a Green Lanes requested by Merkur.

I would like to raise 3 points.

- 1. I am very concerned that opening a new gaming centre, especially of the type proposed by Merkur, may attract more people who behave antisocially to Palmers Green. The premises are near a bus stop, which makes it very accessible to all sorts of people from the surrounding neighbourhoods. Palmers Green is already plagued by a significant amount of antisocial behaviour (statistics here), and violent crime is on the rise. We all know that there is a significant relationship between gambling and antisocial behaviour. Yet, Palmers Green is a residential area, with a lot of schools and families around.
- 2. The premises will be near a park, and near McDonalds, just on the high street. It is a prime spot, which may attract children and other vulnerable people into gambling. Gambling is an addiction and should be treated as such, like smoking, rather than being encouraged. Definitely the opening of a gambling centre in the middle of a residential area, on the route to schools and close to meeting points for young people should be opposed on the grounds of morality and public decency.
- 3. Opening this type of activity in Palmers Green would worsen the feel of the area, negatively affecting property values.
- 4. I was shocked when I was made aware that Merkur applied for a licence. The notice of public consultation was a nearly invisible leaflet near the premises, hung there just in the middle of the last lockdown. No publicity was made on social media or anything. I found out about it through campaigners on social media. The

consultation was definitely inadequate, and one would think suspiciously timed to coincide with the lockdown.

I hope you take my remarks into positive consideration, and I look forward to hearing about the results of the review.

IP57 & IP58 Representation

We are writing regarding the above proposed licence and wish to let you know our objections in this respect.

We have a number of concerns relating to this, namely:

- premises such as this, which we understand will be open 24 hours daily, are likely to attract those who are unlikely to have the interests of the community at heart and may well include criminal elements.
- Palmers Green already has a surfeit of betting shops and any more such gambling establishments is clearly excessive and damaging to the wellbeing of the local population. These venues breed anti social behaviour, which may well be exacerbated after pub closing time.
- Children and young people might be lured in by the seeming attraction of these types of machine. Despite age admission rules, it would not be surprising to find that a blind eye is turned to entry of those under the legal age.
- The site of these premises, having a bus stop immediately outside, will
 provide an obvious visibile temptation not only to adults but to school children
 alighting from buses after school hours.
- It is clear from many reports that people who gamble find it difficult to restrain themselves from spending money resulting in debt and deprivation to home life. Many of these people may well be vulnerable in several ways finding themselves susceptible to potential addiction and exploitation.
- Public notices were displayed by the Council during a combination of Covid lockdown and restrictions. This limited the opportunity for the public at large to take note and to raise subsequent objections.

We hope that you will take the above comments into account and refuse this licence.

IP58 Representation

I wish to express, in the strongest terms, my objections to the granting of a licence to Merkur Slots in Palmers Green. In general terms, I feel that there are already too many gambling premises in Palmers Green and I feel that a slots arcade will attract a younger clientele. Many of them will be people who can barely afford to gamble, and it may well be the start of a lifelong addiction. Without wishing to catastrophise it, I also feel that there is a distinct possibility of an increase in theft and robbery if they run out of cash to spend.

Another concern I have is that the children from the local secondary school wait for their buses nearby and may well be tempted to get involved.

If older people are put off shopping there, it will be the end of the remaining businesses in Palmers Green. There is a centre for older people (Ruth Winston Centre) nearby and it would be terrible if, just as we start life again after Covid, they were too afraid to pass through Palmers Green for fear of antisocial behaviour. One thing is sure: the arrival of Merkur slots will not improve the quality of life for Palmers Green residents. There will be a knock-on effect in many areas.

The lack of consultation is another area which needs to be looked at. I feel the application notices were put up deliberately during a time when people had to stay at home. This is underhand and should not be allowed. The council needs to protect the rights and interests of those who pay their council tax.

IP59 Representation

I would like to formally object to a 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green, High Street, 292-292A Green Lanes, N13 5TW.

I feel very strongly that the original license, granted in January 2021, was authorised in an extremely irresponsible manner, is morally objectionable and should be revoked immediately. Specifically, I object on the ground of:

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

Palmers Green already has a number of betting shops within a short distance to each other. We do not need another gambling centre in the area. There is a concentration of four betting shops in close proximity to the proposed new gambling premises. It is well-known that the risk of money laundering & criminality increases when such locations are in place. These venues encourage behaviour that has a negative effect on individuals, families and communities. People will be able to leave the local pubs at closing time and move to the nearby gaming arcade to start gambling. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

I believe it is important to note that just up the road from the premises is a council/NHS centre to house individuals with problems relating to addiction. It is not uncommon to see such individuals in the area. Offering them 24h betting opportunities seems to logically go against housing them in such a location, as it is surely a negative factor in their treatment/rehabilitation.

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

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. Two schools sandwich the part of our high street in question and there is a school bus stop right outside this venue. There are family run shops along the high street trying to attached customers from the area.

There is also a McDonalds very close by where youths congregate. Neon lights and an alluring shop front will attract a child/young adult's attention. Gambling should not be normalised for children, and yet with this shop children will be exposed to gamblers - and to the risks of antisocial behaviour linked to betting 24/7 - while en route to school, to the nearby park, playgrounds and local shops. It should not be 'normal' to see gambling taking place (or the option to do so) whilst on the walk to or from school.

Palmers Green ward is one of the top 40% of most deprived wards in the country. We witness homelessness and begging. Town centres should not be places where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. After the COVID pandemic, there are now even more people struggling financially, making them more vulnerable to such a venue.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

3) Consultation period

I believe that the consultation period that took place for this licence was during a national lockdown, when it was **illegal** to leave your house unless for the small number of permitted activities. This is totally unacceptable and feels very much like the licence was 'smuggled' out in a deliberate manner. The whole point of the consultation period is to give the local resident's their say and thus completing the process when residents were unlikely to be passing the venue or seeing notices is completely unacceptable. This error needs to be rectified by considering the voice of the local area.

Please note, this is not about being 100% against gambling, per se, but this is about how much the council wish to actively promote such activities, over more healthy options. If people wish to gamble, then there are already sufficient options for them to do so. The local residents have made their voices heard, in that they do not want this new establishment to be opened. We want shops and entertainment, of course. Increasing the number of gambling shops will have a negative effect on our high

street and surrounding area and make it harder to bring in more desired new business.

Please do not allow this venue to open here. I insist the Council has the moral imperative to revoke Merkur's licence and allow our local community to thrive.

IP60 Representation

I am writing to object to a 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green, High Street, 292-292A Green Lanes, N13 5TW

As a local resident, I feel strongly that the license granted in January this year was morally irresponsible and should be revoked immediately. I object on the ground of:

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

Gambling needs to be stopped because it attracts money laundering on its premises and criminality: People who lose money gambling are likely to fill their empty pockets by taking possession of purses found in the handbags of passers-by (mugging).

I am very concerned about walking down my high street late at night when gamblers will be going in and out of the premises and their possible anti-social behaviour, e.g. dealing with anger after having lost their money or drug taking.

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

There is a school bus stop right outside this venue and the school children might be tempted to spend their pocket money in a gambling place. Who is policing them?

Easy access to gambling might make children think gambling is a normal activity in our high street. They are vulnerable because they will not be accompanied by an adult. Who will be there to guard and advise them and inform them of the dangers of gambling:

Depression, suicide, impoverishment, family disputes and break-ups and most of all addiction.

The Council has a care of duty towards their residents and needs to protect them from danger, but there are not enough police available to do so.

The Palmers Green ward is one of the top 40% of most deprived wards in the country and cannot afford the cost of more broken lives. There is already enough homelessness and begging in our area. Since the Pandemic there are now many more people struggling financially, who are vulnerable enough to attend such a venue out of desperation or for escapism.

Medical authorities have established that gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction.

Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. We need good community relationships, gambling destroys this.

The local community is doing its best to make the local economy thrive and safe day AND night. The opening of a 24-hour Adult Gaming Centre in a prime spot in our high street would be highly detrimental to those efforts. It will bring our area down and get a reputation for betting (there are already 4 betting shops here) and gambling.

Please do not allow this venue to open here. I insist the Council has the moral imperative to revoke Merkur's licence to allow our local community to make Palmers Green safe and pleasant to all.

IP61 Representation

As a resident of Palmers Green, I am writing to ask that your review of Merkur Slots Gaming Centre being granted a licence (to join the four other betting shops on the high street), conclude ms that this gambling house has no proper place on high street.

As you are already aware a petition against the new gaming centre rapidly gained over 4,000 signatures.

Gambling houses are not a vital service. They do not contribute to community. They allow vulnerable people be taken advantage of. They encourage congregation that leads to other anti-social activity from the petty such as littering all the way up to drug dealing. There is no justification of their existence and should only be allowed to be conducted online or in retail parks and away from community centres.

The existing betting shops on the high street are already known sites of drug dealing, which the local police are aware of but have not been able to prevent. We can expect this venue to be the same.

The location of the venue is opposite the main bus stop on the high street used by children for both Hazelwood Primary and St Anne's High School. The viability and location of this venue advertises gambling to youths who may also be affected by the antisocial activities that it will attract. Further the current licence appears to grant access to under 18s where food is served

IP62 Representation

This submission is regarding the review of the application for Bingo Premises-Merkur Slots 292-292A Green Lanes. From what I understand Merkur Slots gained license to set up premises on Green Lanes, effectively utilising a lack of adequate consultation stemming from the recent lockdowns that were caused by the ongoing Covid pandemic. The ethics of this move are beyond questionable, but then we are talking about a gambling business, a place exclusively designed to foster addictive behaviour.

Something like this should not have a place in our community at the best of times, let alone during a pandemic that already put so many people under significant financial strain.

Not to mention that these businesses are a fantastic breeding ground for antisocial behaviour and crime, be that through addicted problem gamblers getting more and more desperate to be able to pay for their thrills or simply money laundering. Speaking of addiction: just as the cigarette industry wants to "get them while they're young", the premises for the business are opposite a central bus stop, close to a McDonald's and local schools. A perfect place to create "future business" by advertising to children. Like the next generation won't have enough problems as it is. The problems created by mental health issues associated with (and fostered by) gambling come in all shapes and sizes: from addiction, families breaking up, domestic violence and homelessness to suicide.

If the issue wasn't so serious, it would be hilarious in its immense absurdity: how, as a community, can we allow such a corrosive type of business on our high street (which already has a smorgasbord of similar businesses expediting exactly those problems) causing future problems for children and other vulnerable people (which we now have in abundance thanks to the traumatic events of the last year)? I am speaking from experience here as my own family broke up due to my father's gambling addiction, with my mother desperately safeguarding her money in order to not be pushed into financial ruin. These businesses contribute no value to the community in any way and cause nothing but harm. There should be less of them, not more and we, as a community need to stop them from spreading.

Thank you and have a lovely day.

IP63 Representation

I am writing to object to a 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green, High Street, 292-292A Green Lanes, N13 5TW

As a local resident I feel that the license granted to this venue in January this year was totally irresponsible and must be revoked. I object on the ground of: 1) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime. 2) A venue of this kind going against the principles of creating healthy and welcoming places for the resident community promoting antisocial and addictive behaviour.

I live in Palmers green and I have two small children who are 5 and 2. We live close to the highstreet and I feel worried about the negative impact this will have in the area. I don't feel another gambling centre and certainly one of this size improves the area, it makes me feel unsafe, unwelcomed a pushed me away from shopping

locally and supporting other businesses. I am Sad that my children will witness gambling and addiction in front of them every day as the go to childcare and school.

People have been through a pandemic and an economically fragile period and one of the things that has been most important to us is a focus on people's well being, economically and their mental health. It is irresponsible in a age when ethics and sustainability are so important, to promote businesses like this in an area that is deprived and where many people struggle. The people of Palmers green have worked hard to improve our high street and make it a family friendly and a peaceful place and your decision is at odds with this. It doesn't include the community and doesn'r bring anything positive to it. The high street should encourage the local community to create businesses rather than bringing businesses that attract crime, unployment and take advantage of vulnerable people.

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, drug dealing and criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. People will be able to leave the local pubs at closing time and move to the nearby gaming arcade to start gambling. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

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

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. Two schools sandwich the part of our high street in question and there is a school bus stop right outside this venue.

There is also a McDonalds very close by where youths congregate. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers - and to the risks of antisocial behaviour linked to betting 24/7 - while en route to school, to the nearby park, playgrounds and local shops.

Palmers Green ward is one of the top 40% of most deprived wards in the country. We witness homelessness and begging. Town centres should not be places where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

Please do not allow this venue to open here. This is not a matter of a new business ticking boxes in an application form. This is about the long term impact in the area and the community. I insist the Council has the moral imperative and resposibility to revoke Merkur's licence and allow our local community to thrive.

IP64 & IP65 Representation

We wish to voice our opposition to a licence being granted for the above premises.

Notwithstanding that it is socially irresponsible to encourage gambling, the operation of slot machines in this form, rather than, say online, offers no control over amounts gambled. There is already ample provision of betting facilities in Palmers Green and the presence of betting premises with 24-hour opening hours can only encourage crime and misbehaviour on Green Lanes. The fact that the projected site is right by a bus stop where children alight should have rung alarm bells for those considering this application. The impact on the children of the area cannot be overstated. If there is to be any regeneration of Palmers Green high street then this is the last thing that is needed.

IP66 Representation

The reasons I object to this planning application are as follows:

There is huge evidence that gambling can be a source of crime and disorder in many areas where numbers of young people congregate; with a central bus stop opposite, a McDonalds close by and a route home for a number of schools this is an inappropriate application.

This could have an enormous impact on children and young people and vulnerable adults, particularly as we come out of Covid infections

The unfairness of putting this application forward at a time when most shops were closed in Palmers Green High Street and there were very few people around to see the small notice on the shop. It was totally inadequate in informing people of the application.

There are people trying to improve Palmers Green as a shopping high Street. This application does not support the process at all.

IP67 & IP68 Representation

I am a resident of Palmers Green and a local business owner and object strongly to the 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green, High Street, 292-292A Green Lanes, N13 5TW.

Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. The Palmers Green Action Group has recently raised enough funding, for example, to start to re-green Palmers Green High Street with larger trees in pots. The local community is certainly keen to see the local day and night-time economy thrive, but the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The license granted in January this year was morally irresponsible and should be revoked immediately. The notifications about the change of use of these premises seem to have been deliberately advertised just before Christmas at a time when footfall on the High Street was limited because of Covid, and being Christmas, our minds were on trying to salvage some of the celebrations.

I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises, only recently reduced down to this number. There is a well-known risk that these venues attract money laundering and criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. People will be able to leave the local pubs at closing time and move to the nearby gaming arcade to start gambling. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

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

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. Two schools sandwich the part of our high street in question and there is a school bus stop right outside this venue.

There is also a McDonalds very close by where youths congregate. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that

children will become normalised to gambling on the high street. Children will be exposed to gamblers - and to the risks of antisocial behaviour linked to betting 24/7 - while en route to school, to the nearby park, playgrounds and local shops.

Palmers Green ward is one of the top 40% of most deprived wards in the country. We witness homelessness and begging. Town centres should not be places where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Please do not allow this venue to open here. I insist the Council has the moral imperative to revoke Merkur's licence and allow our local community to thrive.

IP69 Representation

This email is to make a formal complaint about the licensing of Merkur slots gambling centre.

I have to object to this as I do not believe such a business on Palmers Green high street can be of any benefit to local residents.

Apart from the fact that we already have numerous betting shops on the High Street I really do not feel that another gambling centre is appropriate.

The UK is already dealing with a gambling epidemic which in itself causes hardship mental health issues which often result in suicides.

These gambling centres are a magnet for crime and anti social behaviour which impacts on the local police force as they are the ones who are called in the event of a disturbance not to mention local residents who want to go about their daily business unhindered.

We have many schools in this area that use the bus stops outside the intended site of gambling centre exposing them to gambling on a daily basis which is totally unscrupulous.

Furthermore I must also object to the lack of consultation with the local community that was carried out and I would like to see some evidence of notifications either in newspapers or online that was carried out by LBEnfield prior to assuming that locals would not object to this centre. Last year many people have not been conducting normal daily activities and as such this application has been able to slip through the net.

I therefore have to reiterate that I strongly oppose this application for a gambling centre in Palmers Green.

IP70 & IP71 Representation

We are writing to strongly object to the proposed Gambling Arcade in Palmers Green N 13.

Due to Covid restrictions the local community were completely unaware of this proposal and we bitterly resent this underhand was to bring in something no one wants .

The proposed site is in a busy family high street currently attempting regeneration. It is very near many primary and secondary schools where many children pass daily. It will attract crime, disorder in a peaceful area and also attract vulnerable young people to the site who do not need this either.

How can Enfield on the one hand encourage regeneration efforts eg Palmers Green Action Group and then propose to install a major gambling centre which everyone is objecting to?

Please reconsider immediately.

IP72 Representation

I am writing to object to a 24 hour adult gaming centre being opened by Merkur slots in Palmers green, high street, 292-292a Green lanes, N13 5TW.

as a local resident i feel strongly that the licence granted in January this year was morally irresponsible and should be revoked immediately on the grounds of:

- 1) preventing gambling from being a source of crime or disorder, being associated with crime or being used to support crime
- already 4 gambling centres on the small high street
- well known risk that these venues attract money laundering and other crimes
- people will leave pubs at closing time and move to the nearby gaming arcade to start gambling. Link between gambling and alcohol. The venue will attract anti-social behaviour which is a concern for local residents
- 2) protecting children and other vulnerable persons from being harmed or exploited by gambling
- totally unsuitable for the area with a large number of growing families and elderly.
- lots of schools nearby and mcdonalds where there are young people. we dont want children to see gambling as normal in our community
- palmers green is one of the top 40% of most deprived wards in the country.
- 3) public health dangers
- gambling related to serious mental health issues, and rising amongst teh younger age group

please do not open this premises. The council has a responsibility to the residents of palmers green.

IP73 Representation

I and many others in Palmers Green are very concerned about this gambling arcade in Green Lanes for the following reasons:

1. YOUNG PEOPLE AND VULNERABLE ADULTS

It will attract children and vulnerable young adults in a gambling environment which could lead to crime and antisocial behaviour. The site is near a primary school in Hazelwood Lane and a high school in Oakthorpe Road. The bus stop outside is used by schoolchildren. We have witnessed drug dealing in the area and you can be sure that these people will target any young people who may attend Merkur slots. There is a branch of Macdonalds and other venues nearby that attract younger people.

2. PROBLEMS WITH GAMBLING

Palmers Green is littered with betting shops and gambling leads to many social, mental, physical and other problems. A spiral that can lead to suicide, family breakup, addiction leading to severe financial hardship. A gambling arcade will reinforce and normalise this behaviour in young people and vulnerable adults.

3. LACK OF CONSULTATION IN A PANDEMIC

The lack of consultation over this development which should have been publicised more widely. Over 4,000 people have signed a petition to oppose this licence most of whom weren't aware of the licence. You dont need me to remind you that politically this could rebound on the council if this goes ahead. What if this arcade does open and there are protests, and this gets into the local papers TV?

4. NEED FOR A VARIETY OF SHOPS

Palmers Green used to be a thriving secondary shopping centre with a variety of shops, pubs, services. It seems to be converting into several strands now, forcing people to travel by car for certain items, increasing pollution, despite the cycle lanes. On that particular site in the past, we used to have a branch of Tescos and latterly a clothes shop, something of use to the community. What good is another gambling site? If there is not much commercial interest, I would like it to be used for a centre for art, music, or crafts, supported by the council. Whilst not an advocate of more cars you could advertise the car parking behind Macdonalds. I am pretty sure many are not aware of this.

5. MAKE PALMERS GREEN A GREAT PLACE TO LIVE Let's try to improve Enfield and be positive to attract people to live here. If people see what the area is becoming then they will shun it and Palmers Green will sink further. Close all the betting shops, these I think will go anyway with the advent of online gaming. Eventually, in the long term, you'll have a poor neighbourhood where people get behind with council tax, crime will increase etc. It's a short term gain for greedy landlords who don't care what misery they cause as long as they get paid.

LET'S MAKE LIFE BETTER!

IP74 Representation

Please do not authorise this company to set up a 24-hour Bingo premises in Palmers Green. We have a number of primary and secondary school locally, and it promotes the idea to pupils that all-night gambling is normal and totally acceptable, without any restraint. There may be an age limit, but who is going to enforce it 24/7? We also have a number of people with various needs in the area, some who have problems with alcohol, who are often begging, and the idea that a place is open 24 hours a day may well encourage them and others to come into the area in order to try and gain overnight shelter. I would also suggest that some may be very interested in gambling their benefit money in the hope of making more to get alcohol, and Merkur Slots would be in easy walking distance from the Post Office. It is just putting temptation in their path.

Please do not grant Merkur Slots their premises application.

IP75 & IP76 Representation

I am writing to object to a 24hour adult gaming centre being opened by Merkur Slots in Palmers Green 292-292A Green Lanes N13 5TW.

As local residents, with an interest in the local area, we feel that the licence granted in January this year was morally irresponsible and should be revoked immediately.

I object on the grounds of

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

There is already a concentration of 4 betting shops in the immediate vicinity of the proposed Merkur Slots and we do not need another gambling centre in the area. There is a well-known risk that these centres attract money laundering and criminality. These venues encourage behaviour that has a negative impact on communities. After pub closing times, people can go on to the 24-hour gaming centre to start gambling. This will no doubt attract anti-social behaviour to the area; on our street WhatsApp Group this month alone we've been informed already about several house burglaries this month, several attempted car break-in's and also antisocial behaviour directed at people who live on our street. Encouraging further anti-social behaviour particularly when the police are so under-resourced is irresponsible and really worrying for those that live in the area.

I object on the grounds of

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

This venue is totally unsuitable for a community with many families and children, many of whom are attending local schools that are very near to the centre in question. There is a school bus stop right outside this venue. Neon lights and an alluring 'open all hours' shopfront will attract teenage/young adult's attention. *I have*

concerns our teenagers (and my own teenager even) will become normalised to gambling on the high street. Children will be exposed to gamblers on the way to school, to the park, playgrounds and local shops. Palmers Green Ward is in the top 40% of the most deprived wards in the country. Local shops and communities are trying to improve the area. We should not as a community be encouraging people to waste money and get into debt, and cause damage to their lives and their families. Since Covid there are also many more people struggling financially who should not be encouraged to gamble.

I object on the grounds of

3) Public Health Dangers

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25year olds who are suffering from addiction. It is well documented that gambling addiction can result in homelessness, suicide, domestic violence and family break ups.

Local residents have worked hard together with businesses to try to improve and support the high street, to make it an attractive place to go as a local community, at a time when high streets are facing huge challenges. It would be very depressing to allow this to open, further bringing the area down when people are trying really hard to improve it for the benefit of all the community that lives here. The opening of a 24-hour Adult Gaming Centre, in a prime high-street location, is hugely detrimental to the hard work that has gone in to trying to improve the local area.

I object on the Grounds of

4) Local residents were not given the correct opportunity to review the licence at the time it was granted

Enfield council must listen to the residents' concerns and revoke Merkur's licence. The licence was granted at a time when no local residents were aware of the plans, and due to Covid restrictions, were not given the correct opportunity to object at the time, as they should have been. We have heard that the notice attached to the empty shop did not meet the specifications laid down by the council; also the period during which objections could be lodged was at a time when Covid-19 cases were particularly high and people were staying at home on government advice (prior to vaccines and with schools shut, and only essential visits to food shops etc advised).

Please do not allow the Adult Gambling Centre to be opened here; the council must review all the evidence and revoke the licence. The licence should be revoked for the above reasons and our local high street should be given a chance to thrive and make it a pleasant place for the local community to visit.

<u>IP77 Representation</u>

I wish to express in the strongest possible terms my opposition to Merkur Slots being granted a license to operate a gambling concern at 292-292A Green Lanes.

The stretch of Green Lanes including 292-292A is the main local shopping hub for Palmers Green and serves a large residential area. The local community, residents and business owners have worked hard to enhance the area, improving safety and local facilities and so encourage it's development as a family friendly area. The opening of the proposed gambling establishment would undermine what the local people have been striving to achieve. I doubt if such an establishment would bring anything good to the area whereas I can foresee numerous disadvantages.

- 1. It will encourage people to hang around outside which in turn is likely to increase the risk of incidents and unruly behaviour on the pavement.
- 2. At night it is likely to lead to noise and disturbance for the local residents, which include children, in the flats above the shops.
- 3. The premises are within a few minutes walk of both primary and secondary schools and in addition there are bus stops for routes to other nearby schools outside the premises so school age children would have to walk by or wait outside.
- 4. There are a number of vulnerable people evident in Palmers Green including homeless men and women who would be put at further risk by this proposed development.
- 5. There is residential provision for vulnerable people within a few minutes walk of 292-292A. I know of provision for people with mental health needs and further provision for people with learning disabilities and I'm pretty sure there is further specialist provision that I'm not aware of. These people should be able to participate safely in the local community and this development would threaten their right to be able to do that.
- 6. For those people who maintain that everyone should have the right to enjoy gambling, there are already numerous betting shops along Green Lanes for those who wish to do so.
- 7. Conversely, for those struggling with a gambling addiction this development would make their lives and the lives of their families much more difficult.

In light of all the concern expressed by numerous people I hope you will refuse to grant Merkur Slots the license.

IP78 Representation

As a local resident, I do not believe that the licence should be permitted to continue.

I object on the grounds of:

1) preventing gambling from being a source of crime or disorder, being associated with crime or

disorder or being used to support crime.

There is already a concentration of four betting shops close to the proposed new gambling premises. Crime can be caused by many things but sourcing money to feed an addiction is certainly one cause. Crime can also be caused by people not coping with modern society and there is a link between gambling and poor mental health - see link to article from the BMJ:

10.1136/bmj.39182.424965.AD

Giving people an additional and different form of gambling on a 24 hour basis means those who are already vulnerable will be able to or enticed to. This is particularly true as Merkur Slots will be open once the pubs which are very close by close and will offer complimentary food and drink. If the only place to go when the pubs close is Merkur Slots then people will go there at the point when they are least able to resist temptation and control their behaviour. The resulting gambling will have a negative effect on individuals, families and communities.

Running out of money to continue gambling will lead to customers looking to get money - that may be through robbing others in the high street or taking it from people's homes and cars. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises for fear of their mood and need for cash.

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

This type of venue is totally unsuitable in this area with a large number of growing families and elderly.

Two schools sandwich the part of our high street in question and there is a school bus stop right outside this venue. There is also a McDonalds very close by where young people as well as families with young children congregate. Neon lights and an alluring shop front will attract a child/young adult's attention even if they are not allowed to go inside, maybe especially because they are not allowed inside. I am concerned that children will consider that it is normal to gamble on the high street 24 hours a day - which it is not.

Children will be exposed to gamblers - and to the risks of antisocial behaviour linked to betting 24/7 - while en route to school, to the nearby park, playgrounds and local shops.

Palmers Green ward is one of the top 40% of most deprived wards in the country. We witness homelessness and begging on the high street every day. Beggars live in our community and spend time approaching people on the street as well as those sitting at cafes, waiting by ATMs or outside supermarkets and also sitting on the pavement. You see those same people drinking outside the Alfred Herring or ST Food and Wine once they have managed to get some money.

Also shoplifting is a daily issue. The now closed Co-op just down from where Merkur Slots is opening had to introduce security guards as they were losing so much money and ultimately losses due to shoplifting was one of the reasons for their closure. Those who shoplift are well known and are likely to see gambling as a good way of increasing the money they have - when of course the opposite is true. But those people deserve protection from the temptation.

Town centres should not be places where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many

more people now struggling financially, making them more vulnerable to such a venue.

3) Public health dangers

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups. Palmers Green high street already has strong evidence of people who are struggling and they will be exposed to temptation right next to where they get off the bus or visit the chemist.

Local residents in Palmers Green have worked with businesses to improve and support the high street trying to make it a more pleasant environment for the community at a time when local high streets are facing huge challenges. Landlords do not need to let to gambling companies - there are plenty of other viable, interesting tenants. The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts just at the point of reopening after Covid.

Please do not allow this venue to open here. Please use the powers which other local authorities have used to restrict casinos and the impact on the large numbers of children and vulnerable people who use the high street.

I have previously written about my objections about how the licence was granted taking into account the impact of coronavirus and lockdown on the fairness and administration of the process. I appreciate very much that the licence is being reviewed in light of those objections.

IP79 Representation

I am a resident of Palmers Green, together with my husband and our two primary-school aged children. I am writing to express my deep concern regarding the application by Cashino Gambling Ltd (trading as Merkur Slots) in relation to a planned 24 hour adult gaming centre at 292-292A Green Lanes (Planning Application 20/03849/FUL). I urge you to prioritise the safety and well-being of minor children, vulnerable adults and other residents of Palmers Green by not granting the requested licence.

Palmers Green is a family community. The gambling premises in question is located only a few minutes walk away from local primary schools. It is in the middle of our community high street. A 24 hour gambling/gaming premises is not only wholly inapposite to the character of this community but represents a real danger to the area and its residents. It has been empirically proven that the prevalence of problem gambling is at its highest in the vicinity of gambling premises. Availability and convenience are strongly associated with problem gambling. In its 2006 "Research on the Social Impacts of Gambling", the University of Glasgow confirmed that electronic gaming machines (such as those that would be installed at the proposed

gaming centre) "can encourage impulsive gambling and are associated with the highest rates of problem gambling worldwide".

There is a wealth of other significant empirical research worldwide that confirms the negative impact of gambling on both communities generally and individuals within those communities. These negative consequences, which will inevitably result if the proposed 24 hour gambling centre is allowed to open in Palmers Green, include, for example:

- Increase in anti-social behaviour due to the kind of patrons that these
 establishments attract, particularly when they are open 24 hours. Research
 shows that co-morbidities such as alcohol and substance abuse, and the
 tendency to violence and criminal behaviour, are extremely commonly present
 in habitual gamblers.
- Increased crime and public disorder, in terms of both antisocial behaviour such as damage to property and crimes committed in order to obtain money for gambling. Local residents have well-founded fears that the Palmers Green area will be less safe, particularly at night, if Merkur Slots are permitted to establish a presence here.
- Negative effect on young and vulnerable residents of Palmers Green. Not only
 will their home area be less safe, so that their persons and property are at
 risk, but they will be exposed to undesirable behaviours. This includes being
 exposed not only to gambling itself and the anti-social behaviours that go
 hand in hand with it, but also to the co-morbidities linked to gambling
 discussed above, such as alcohol and substance abuse. The risk of
 normalisation of such behaviours by encouraging gambling establishments of
 the type proposed, and the potential ramifications of that normalisation (not
 least children and vulnerable adults being harmed and exploited), cannot be
 overestimated.
- There is an impact not only on the residents of areas where gambling is encouraged, but also on the patrons of gaming centres. Empirical research confirms statistically significant rates of debt, bankruptcy, depression, suicide, domestic violence, criminal offending, lost productivity, job loss, poverty, homelessness, low education levels, familial distress, violence and both mental and physical illness amongst gamblers as compared to the general population.
- Increased public costs to deal with the impact of gambling generally, such as
 policing costs and the cost of maintaining regulatory oversight, and the impact
 on gamblers, such as the cost of unemployment, treatment costs, and other
 social services and payments related to gambling addiction.

In short, there are no legitimate benefits to allowing gambling centres (particularly 24 hour establishments) to operate in communities. Even if any supposed benefits could be cited, there is no doubt these are completely outweighed by the public harm they cause. The financial interest of Merkur Slots in this application is grossly disproportionate to the social harm that the granting of their application will bring to Palmers Green and its residents. It is, moreover, notable there are already a number of betting shops on that stretch of Green Lanes. To encourage even more crime, disorder and harm to children and vulnerable residents by approving yet another gaming establishment (and this time a 24 hour one with electronic gaming machines) would be wholly irresponsible.

I also note the irregularities in the original application by Merkur Slots. The "consultation" of the local community did not meet the required standards. The full planning application was submitted by Merkur Slots on 27 November 2020, with the cut off date of 27 December 2020 for objections to be made to the application – i.e. the consultation period ran over the Christmas holiday period and also during the exceptional circumstances of the COVID-19 pandemic, when residents were urged by the Government to stay at home. The sole notice posted on the premises at 292-292A Green Lanes did not conform to requirements: it was an A4 notice on white paper and in extremely small font. I am not aware that the legal requirement for a notice of the application to be advertised in a locally circulating newspaper was complied with, either. The lack of visibility and readibility of the notice, and lack of advertising of the application, combined with the fact that residents were advised not to go out of their homes meant that the vast majority of local residents were simply unaware of the proposal to damage the well-being of our community.

The strength of the objections of Palmers Green residents and business owners cannot be understated. I ask you once again to safeguard the public health, public safety, business, and social interests of our local, thriving, family-friendly community by rejecting Merkur Slots' application

IP80 & IP81 Representation

I am writing to object to a 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green, High

Street, 292-292A Green Lanes, N13 5TW

As a local resident, I feel strongly that the license granted in January this year was morally irresponsible and should be revoked immediately. I object on the grounds of:

1) Preventing gambling from being a source of crime or disorder, being associated with crime or

disorder or being used to support crime.

We do not need another gambling centre in the area. There is already a concentration of four betting shops in

close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract

money laundering, and criminality. These venues encourage behaviour that has a negative effect on

individuals, families and communities. People will be able to leave the local pubs at closing time and move

to the nearby gaming arcade to start gambling. The anti-social behaviour this venue will attract after hours is

a concern, especially when the police are under-resourced. I am also concerned about walking down the high

street late at night when gamblers will be going in and out of the premises, particularly as a young woman.

I should not be made to feel vulnerable on my own high street in my own community.

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

This type of venue is totally unsuitable in this area with a large number of growing young families and elderly. **Two**

schools sandwich the part of our high street in question and there is a school bus stop right outside this

venue. My two sons primary school, Hazelwood School, and preschool are 3 minutes walk from the site in question.

There is also a McDonalds very close by where youths congregate. Neon lights and an alluring shop

front will attract a child/young adults attention. I am concerned that children will become normalised to

gambling on the high street. Children will be exposed to gamblers - and to the risks of antisocial behaviour

linked to betting 24/7 - while en route to school, to the nearby park, playgrounds and local shops.

Palmers Green ward is one of the top 40% of most deprived wards in the country. We witness homelessness

and begging. Town centres should not be places where people are encouraged to waste money and get into

debt, causing damage to their lives and to their families. There are many more people now struggling

financially due to the impact of Covid, making them more vulnerable to such a venue.

3) Public health dangers

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling

clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness,

suicide, domestic violence and family breakups.

Local residents and community group including Palmers Green Action Team (which I am a committee member of)

in Palmers Green have worked tirelessly with businesses to improve and support the high street,

making it a more pleasant environment for the community at a time when local high streets are facing huge

challenges. The local community are keen to see the local day and night-time economy thrive, and the

opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

Please do not allow this venue to open here. I insist the Council has the moral imperative to revoke

Merkur's licence and allow our local community to thrive. We have the support of our local MP, now the council, licencing committee and

councillors should be listening to the voices of local people and acting in their best interests. The granting of this licence is not in

the best interests of Palmers Green community

IP82 Representation

I am Scout Leader at two local scout groups - and .

Between the two groups I have over 50 young people aged 10-14 years attending scouts meetings every week and also weekend events. All young people are local to Palmers Green.

Apart from the issue of going home safely - while most of my scouts are collected by parents, some come and go home alone, particularly in the summer months - we do some activities in Palmers Green itself.

Among others, we have a Palmers Green Area Exploration activity, which, with the purposes of increasing familiarity with and the feeling of having roots in the locality of their home area, training observational skills, and enhancing independence (scouts do the activity in groups of 3-5 individuals with supervision, i.e., within sight of adults), is in my view an essential part of the programme.

Furthermore, twice a year (at least in non-COVID-19 times) Scouts runs a "famous" jumble sale and young people deliver leaflets to houses all around the area to announce it, and the way we do this is also likely to be adversely impacted by increased concerns for child safety.

It is hard to see that a gambling facility is likely to attract the kind of people who will make my scouts feel safe while coming to and going home from scouts meetings and when taking part in activities in Palmers Green, which would have the result in the case of the familiarisation quiz that we would have to have groups accompanied by adults and not under supervision from a distance.

If the gambling site opens it is likely that I will take the exploration activity out of Palmers Green and run it somewhere else, though this will inevitably contribute to a long-term degradation of the soul of the area.

I would therefore like to object to the application on the basis of potential harm to children.

IP83 and IP84 Representation

We are writing in relation to the above review application and wish to register our objections to a licence being granted.

We are residents of Broomfield Avenue in the locality of the proposed Bingo Premises. We also have our 19year old daughter living with us at the above address, who uses the high street frequently. I (xxxxx) am a teacher in North London and in this capacity have grave concerns about the proximity of a Bingo Premises to 3 local schools-Hazelwood, St Anne's and Broomfield.

We understand that under the Gambling Act 2005, the licensing objectives are, inter alia,

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

The dangers of gambling and addiction are now well known and understood and much misery results from this activity. All efforts need to be made to support children in not getting involved in this type of activity especially now when gambling is offered online too. The positioning of a 24hour slot machine venue in a family high street where many children pass by daily is misguided and legitimises the idea of gambling. It also provides a temptation to engage in these activities.

We are also concerned for the vulnerable people in our community who may drift into an establishment of this type -how can these individuals be realistically safeguarded and protected from being exploited by gambling and finding themselves in debt.

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

A 24hour venue of this nature will attract undesirable activity in an area where gang violence is already of concern. We have particular worries for the safety of our 19year old daughter walking down the high street in the evenings past an establishment which would attract groups of men particularly.

We have spoken to many people about Merkur Slots and have found no one in favour of this business. The strength of feeling about needing to protect our children from being harmed by gambling and preventing crime in this community is very high and the wishes of our community need to be respected.

IP85 Representation

I am writing to oppose the license for Mercur slot machines in Palmers Green High Street.

Firstly, I find that the way that this has been applied for has been very dishonest.

A tiny paper was sellotaped to the premises while we were in lockdown and told not to go out unless absolutely necessary. Therefore, these people were hoping no one would see their plan and once it was known it would be too late. They know that the local people would have opposed it. The council should have notified us (it often puts letters through our doors for other things. So this is possible) You have failed us.

To have a betting activity in close proximity to a bus stop where children wait for buses is completely irresponsible!! In fact, any type of endorsement of a betting activity is totally irresponsible. Especially at this time when people do not have much money, may have lost their jobs because of the pandemic (or not). There has been an increase of suicides with the pandemic, so how can a council stand by and support a betting shop/ games arcade opening knowing full well the impact of debt on mental health!!

I implore you to do what you can to block the license of this future shop.

Apart from the damage it will do to the people using it, and the kids waiting outside, it will bring even more crime into the area. It will be a hot bed of dealing all sorts of substances and maybe alcoholism.

Please please block this.

IP86 Representation

I am writing to object to a 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green High Street, 292-292A Green Lanes, N13 5TW.

As a local resident, I feel strongly that the license granted in January this year was morally irresponsible and should be revoked immediately. I object on the following grounds:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well known risk that these venues attract money laundering and criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. People will be able to leave the local pubs at closing time and move to the nearby gaming arcade to start gambling. The antisocial behaviour this venue will attract after hours is a concern, especially when the police are under resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

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

This type of venue is totally unsuitable in this sub-urban area with a large number of growing families and elderly. Two schools sandwich the part of our high street in question and there is a school bus stop right outside this venue. There is also a McDonalds very close by where youths congregate. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers- and to the risks of anti-social behaviour linked to betting 24/7- while en route to school, to the nearby park, playgrounds and local shops.

The Palmers Green ward is one of the top 40% deprived wards in the country. We witness homelessness and begging. Town centres should not be places where people are encouraged to waste money and get into debt. causing damage to their lives and to their families. Only the other day a homeless person was found dead by the bins at the end of Devonshire Road.

There are many more people now struggling financially, making them more vulnerable to such a venue. To allow such a venue in Palmers Green, would be completely irresponsible and immoral.

3. public health dangers

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25 year olds, who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Local residents in Palmers Green have worked tirelessly with local businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

Please do not allow this venue to open here. I insist the Council has the moral imperative to revoke Merkur's licence and allow our local community to thrive.

IP87 Representation

I am writing to object to a 24-hour Adult Gaming Centre being opened by Merkur Slots in Palmers Green. High Street.

292-292A Green Lanes, N13 5TW

As a local resident, I feel strongly that the licence granted in January this year was morally irresponsible and should be revoked immediately.

I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering and criminality. These venues encourage behaviour that has a negative effect on individuals, families and

communities. People will be able to leave the local pubs at closing time and move to the nearby gaming arcade to start gambling. The anti-social behaviour that this venue will attract after normal hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the High Street late at night when gamblers will be going in and out of the premises.

I object on the ground of:

(2) protecting children and other vulnerable persons from being harmed or exploited by gambling.

This type of venue is totally unsuitable in this area with a large number of growing families and elderly residents. Two schools sandwich that part of our high street in question and there is a school bus stop right outside this venue. There is also a McDonalds very close by where youths congregate. Neon lights and an alluring shop-front will attract a child/young adult's attention. I am concerned that children will become exposed to gambling on the high street. Children will be exposed to gamblers - and to the risks of anti-social behaviour linked to betting 24/7 - while en route to school, to the nearby park, playgrounds and local shops.

Palmers Green ward is one of the top 40% of most deprived wards in the country. We witness homelessness and begging in the High Street.

Town centres should not be places where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to the risks that such a venue poses.

I object on the ground of:

(3) Public health dangers

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13- to 25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family break-ups.

A House of Lords report titled <u>"Gambling Harm – Time for Action"</u> published in July 2020 found that half the adults in the UK gamble at least once a month. A third of a million of UK citizens are "problem" or "disordered" gamblers. It is estimated that for each problem gambler, six other people – a total of two million – are harmed by the breakup of families, crime, loss of employment, loss of homes and, ultimately, loss of life.

The summary of this report begins with this astonishing statement:

"One third of a million of us are problem gamblers. On average, one problem gambler commits suicide every day.

The young are most at risk:

- 55,000 problem gamblers are aged 11–16;
- for girls aged 11–16, the rate of problem gambling is twice that of any other female age group;
- for boys, the rate is three times the rate for adults;
- for all of them, gambling is illegal, yet such efforts as the industry makes to prevent it are altogether unsuccessful"

This is such an alarming finding that Councils should bear these startling statistics in mind when considering granting permission for another gambling venue.

Such high street establishments will naturally be interesting and inviting for some and will most likely encourage impulse gambling

which might lead to addiction. The consequences could be devastating and detrimental to individuals and their families.

Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more

pleasant and safe environment for the community at a time when local high streets are facing huge challenges. The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

Please do not allow this venue to open here. The Council has the moral imperative to revoke Merkur's licence

and allow the local community to thrive rather than be at risk of serious harm.

IP88 Representation

I attach a letter I have sent to the Gambling Commission for inclusion in your review. Please study it in detail and I hope it has a positive impact on the situation.

Gambling Act Review Paragraph 67 Question 43

Submission by xxxxx

I was extremely upset to find out that the Government has given permission to MERKUR Gaming to open a 24 hour Slots emporium in my High Street (Green Lanes, London N13) without consulting the populace. I was even more upset to find out that our Local Enfield Council had incredibly few opportunities or options to object to this on our behalf.

In view of this I strongly request that the Review pay considered and concentrated attention to this objection.

I would wish that our Local Council had more powers to refuse such an unsuitable company to set up business in our close-knit community.

POINTS TO CONSIDER

- 1) Noise nuisance.
- 2) The place will be a magnet for drifters, vagrants and petty criminals.
- 3) It will lead to more incidents of theft, muggings, intimidation of elderly, the vulnerable and shoppers. There have already been incidents of stealing lunch money from schoolchildren so that gamblers can return with what they have stolen to the betting shops.
- 4) Gambling in the Fox public house led directly to murder in Fox Lane.
- 5) Gambling addiction by local shopkeeper of the xxxxx shop (in Green Lanes near the Post Office) led to the loss of the business and homelessness and humiliation endured by both him and his wife and children.
- 6) In an area already devastated by Covid, gambling emporiums are just the coup de grace needed to ensure utter poverty and dereliction--therefore far from a good idea!
- 7) This is a family area, a residential, close-knit and friendly community. There are four schools and as many churches locally. This ambience should not be jeopardised by the presence of such a venue as proposed by the Merkur Slots Gaming DEN!!
- 8) The inevitable increase in criminality and nuisance will put an intolerable burden on the police at a time when it's the last thing they need. Gradually the area will become undesirable, leading to loss of investment and a council (and government) even more strapped for cash. This will not improve our community or the nation in the long term.

As a result of this review I sincerely hope our Local Council will be given wider powers to prevent such an unsuitable business from opening up in our High Street.

IP89 Representation

To the Enfield Council Licensing Committee,

SUBJECT: Review Application for Bingo Premises – Merkur Slots 292-292A Green Lanes

I am writing to object to a 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green, High Street, 292-292A Green Lanes, N13 5TW.

I feel strongly that the license granted in January this year was passed at a time in pandemic circumstances that did not allow the voice of local residents such as myself to be properly taken into account. Granting it was morally irresponsible and the license should clearly be cancelled. I object on the grounds of:

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

Since there are already four betting shops very closely situated to the proposed new gambling premises, the last thing we need is another gambling centre in the area. The risk that these venues attract criminality is well-documented, whether of a low-level anti-social nature or as an opportunity for money laundering. These venues foster behaviour that has a negative effect on individuals, families and communities.; their effect is potentially corrosive and destructive for everyone concerned.

On leaving local pubs at closing time, people who have been drinking will be tempted to move on to the nearby gaming arcade to start gambling. The anti-social behaviour this venue will subsequently attract after hours is therefore a very valid concern. Under-resourced police cannot be expected to solve this totally unnecessary addition to their workload. As an older female ratepayer, I have no idea why the Council would expect me to have to walk down the high street late at night when gamblers will be going in and out of the premises. I daresay I will no doubt also have to negotiate my way past groups of smokers assembling on the pavement outside - or even worse, individuals taking the opportunity afforded to deal drugs.

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

This type of venue is totally unsuitable in this area with its large number of growing families and elderly. Two schools exist in close proximity to the part of our high street in question and there is a school bus stop right outside this venue. There is also a McDonalds very close by where youths already congregate. Neon lights and an alluring shop front no doubt will attract a child/young adult's attention. It is inevitable that even very young children will become normalized to gambling if such a venue is accepted as a visible presence on the high street. Children will be exposed to gamblers in person not just online, and to the risks of grooming and other antisocial

behaviour linked to betting 24/7 while they are enroute to school, to the nearby park, playgrounds and local shops.

Gambling must be taken seriously as a factor contributing to serious mental health issues. We have seen a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. We know that gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

I believe that Palmers Green ward is one of the top 40% of most deprived wards in the country, already prone to a degree of homelessness and begging. Town centres should not be places where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are more people struggling financially than ever after this pandemic, making them even more vulnerable to such a venue.

How can the Council be complicit in facilitating this potential disease?

3) Safeguarding the future wellbeing of the high street;

Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

Please do not allow this venue to open here. I urge the Council to fulfil its moral duty to revoke Merkur's license and allow our local community to thrive.

IP90 Representation

To the Enfield Council Licensing Committee,

Re: Review of the Application for Bingo Premises – Merkur Slots 292-292A Green Lanes

Dear Sir/Madam

I am writing as I would like to strongly object to a 24-hour Adult Gaming Centre being opened by Merkur Slots in Palmers Green High Street 292-292A Green Lanes, N13 5TW

I am a local resident and I feel very strongly that the license that was granted in January this year was morally irresponsible and should be revoked immediately.

The reasons I object are:

1) Protecting children and other vulnerable people from being harmed or exploited by gambling.

This type of venue is totally unsuitable in the Palmers Green Area as there are a large number of young and growing families as well as the elderly. There are two large local schools serving many young families, which sandwich the part of Green lanes close to the proposed venue. I myself have a family of two young teenage boys who go to school in this area. Many school children including my son catch the bus from the bus stop which stops directly outside the proposed venue. I am extremely concerned about the impact of this venue on my 2 sons as well as the many young people living in the area. There is also a McDonalds very close to the proposed venue where young people gather in friendship groups. Neon lights and alluring shop frontage will attract the young peoples attention. It concerns me that children and young people will become normalized to gambling on the high street and that they will be exposed to gamblers and the risks of antisocial behavior linked to betting 24/7. My son will see this every day on his way to school or when riding his bike to the park or playground. This concerns me greatly.

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

We do not need another gambling center in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering and criminality. These venues encourage behavior that has a negative effect of individuals, families, and communities. I am extremely concerned about the antisocial behavior this venue will attract late at night or early evening when my teenage boys may be walking to or from friends' houses.

I myself as a single mother am also concerned about walking down the high street on my own from work in the evening.

3) Public health dangers

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25 yr. old's who are suffering from addiction. My young sons are within this age group and I am concerned about the impact of a 24-hour gambling venue on their young impressionable minds from a mental health point of view.

Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Local resident in Palmer Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. The local community are keen to see the local day and night-time economy thrive and the opening of a 24-hour Adult Gaming Center in a prime spot in the high street would be severely detrimental to those efforts.

I have lived in palmers Green for more than 20years and have always felt that Palmers green was a warm family centered community and was pleased that I decided to bring up my young family here. The granting of a license to a 24-hour Adult Gaming Center has severely made me question that decision and deeply saddens me. I implore you to re-consider your decision. This community and its wellbeing is incredibly important to me and my family.

Please do not allow this venue to open here. I insist the council has the moral imperative to revoke Merkur's license and allow our local community and young people to thrive.

IP91 & IP92 Representation

As Palmers Green residents we are writing to lodge our objection to the proposed award of a 24-hr licence to Merkur Slots for the installation of bingo and gambling machines at premises located in the centre of Palmers Green High Street.

It is regrettable that local residents have only recently become aware of Enfield council's decision to approve the licence for both this and (rumour has it) a similar application for a Merkur venue on Southbury Rd, Enfield. These decisions appear to have been made at a time when council actions were less open to public scrutiny because of the pandemic lockdown. We are, therefore, pleased to note that the council leader, Nesil Caliskan, and one of our local councillors, Tim Leaver, appear to have put their weight behind an attempt to reverse the original ratification. Similarly, we are pleased to note that our local member of parliament, Bambos Charalambous, has taken note of complaints from local residents and agreed to take up their appeal while also expressing disapproval of the current application.

As Mr Charalambous says, the proposed site "will be close to existing betting shops already in the local high street" (Paddy Power and Ladbrokes) "and would be a very unwelcome addition to the night-time and day-time economy of Palmers Green as well as pose a risk to young and vulnerable residents" and that "recent efforts by local residents to improve and help regenerate the high street would be negatively impacted by this arcade right in the centre of the main shopping area" and, he might have added, adjacent to a large Wetherspoons public house, "The Alfred Herring".

Mr Charalambous goes on to point out that the council is "restricted by law in its ability to limit the number of gambling premises and the type of representation which it can take into account when determining an application to open gambling premises". However, it seems that the national body which regulates gambling and issues licenses can only give "guidance" to Local Authorities with "an aim to permit" gambling premises and that a Local Authority "should not comment on whether there is a demand" for such premises. This seems to be a strange interpretation of what merely amounts to "guidance" and how a Local Authority can determine whether there is a local demand for gambling premises without some sort of referendum is manifestly unclear. The only demand any council can be sure of is that of the licence applicant, supported by the Gambling Commission. If this happens to be the law as it stands, then it makes little sense.

Referring to the July 2020 House of Lords Committee on gambling harm, Mr Charalambous expresses his support for the Lords' recommendation "to increase the powers of Local Authorities to limit the growth of gambling premises in an area, for example on the basis of objections from the local community and considerations of the character of the locality" and that this "would be in line with the process for licensing premises for the sale of alcohol". We sincerely hope that the council will take these views on board as part of their reconsideration of the Merkur licence grant.

We recognise that this is ostensibly a licence for adult gambling and that the premises will be stewarded and, one hopes, subject to regular police oversight. Nevertheless, the prospect of a venue open for twenty-four hours a day will inevitably lead to breaches of any nominal protocol and will tend increasingly to attract an under-age clientele as well as inebriated gamblers, plus the inevitable drug dealers, pickpockets and other small-time crooks, not to mention the unwanted noise disturbance to residents living in flats either above those shops which are adjacent to or nearby the proposed site. The last thing the tenants will want to hear is late-night or early morning hubbub in both the venue itself and outside on the pavement where punters are likely to gather.

It will also be situated on a high street frequented by children from two local schools –Hazelwood Junior and St Anne's Catholic Girls' School - and, especially on dark winter evenings, will seem like an enticing attraction. We all know that gambling addiction can begin at an early age and can result in homelessness, suicide, domestic violence and mental breakdown. Palmers Green ward is, apparently, already one of the top 40% of the most deprived wards in the country and further deprivation needs to be opposed at all costs.

Our High Street is badly in need of regeneration in the wake of lockdown resulting from the recent pandemic. What it does not need is the degeneration which the award of a licence to Merkur Slots is likely to produce.



FOX LANE & DISTRICT RESIDENTS' ASSOCIATION

www.foxlane.net

IP93 Representation

FLDRA 211 Fox Lane London N13 4BB

By email to:

<u>licensing@enfield.gov.uk</u> <u>bambos.charalambous.mp@parliament.uk</u> fldracttee@gmail.com

9 May 2021

Dear Sir/Madam

RE: Review of Application for an Adult Gaming Centre - Merkur Slots

We write to object to the opening of Merkur Slots, a 24 hour Adult Gaming Centre to be located at Palmers Green High Street, 292-292A Green Lanes, N13 5TW.

As the local Residents' Association, we feel strongly that the licence granted in January 2021 was morally irresponsible and should be revoked immediately. We list our reasons to object on the following grounds:-

1. 24 hour gambling will contribute to a source of crime and anti social behaviour; It will more than likely make the area a "no-go-zone" for women, particularly at night".

It is evidential that we do not need another gambling centre within the area. There are already four betting shops in close proximity to the proposed new gambling premises. Such venues attract money laundering, criminality and anti-social behaviour. Such behaviours have a negative impact on individuals, families and destroy communities. Due to this venue being 24 hours, the anti-social behaviour at all hours of the night and early mornings it will attract is a cause for concern. We are already aware of the disruptive behaviour pubs bring without adding the addition of a 24 hour gambling centre. Consideration must be given to our police forces who are already overworked and under

resourced.

2. Our duty in protecting children and other vulnerable persons from being harmed or exploited by gambling.

A 24 hour gambling centre is totally unsuitable to this area, due to the large number of families, growing families and elderly residents. There are two schools situated at either side of our high street making the location of the venue questionable. In addition, located directly outside the venue is a school bus stop/bus stop. We know only too well that many youths congregate at McDonalds which is only a stones throw away. The venue's neon lights will make the shop front alluring and will inevitably attract young children. We are concerned that this may become appealing to children, resulting in it being normalised, which it should not. This appealing nature will be unavoidable to our youth and will expose them to gamblers and gambling whilst en route to school, libraries, playgrounds and parks as well as their local shops. We have already mentioned the concern surrounding anti-social behaviour above.

3. The need to improve our already deprived Ward

Palmers Green Ward falls within the top 40% most deprived Wards in the Country. We witness homelessness and begging on a daily basis, which should tell us there is major room for improvement. Town centres and high streets should not be places where people are encouraged to get into debt, causing damage to their lives and to their families. There are many people more-so than before, struggling financially making them more vulnerable and extra sensitive to such a venue.

Gambling has been related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in severe financial hardship, homelessness, suicide, domestic violence and family breakups to name a few. Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges.

The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

Please do not allow this venue to open here. We insist the Council has the moral imperative to revoke Merkur's licence and allow our local community to have a chance to thrive.

Bambos - we send to you in hope of your support.

We look forward to receiving your response.

Kind regards

Philip Sheffield, Chair Sabrina O'Reilly, Planning

BAMBOS CHARALAMBOUS MP ENFIELD SOUTHGATE



Our Ref: BC25464

BY EMAIL ONLY TO: licensing@enfield.gov.uk

12 May 2021

Dear Enfield Licensing

REVIEW APPLICATION FOR BINGO PREMISES – MERKUR SLOTS 292-292A GREEN LANES

I write as an interested party representing my constituents in Enfield Southgate to support the review of the gambling premises licence granted to Merkur Slots for 292-292a Green Lanes, N13 5TW.

I have been contacted by over 100 local residents who are unanimous in their opposition to this establishment opening in the local shopping area of Palmers Green. The Fox Lane & District Residents' Association, representing a large area adjacent to Green Lanes, have also informed me of their concerns. And I am aware that Enfield Council's Leader and the Palmers Green Ward Councillors also oppose this licence.

I share the concerns of local residents and strongly oppose this gambling premises licence. I urge the Licensing Sub-Committee to carefully consider the comprehensive evidence provided by Enfield Council Leader, Cllr Nesil Caliskan in her review application letter of 14 April 2021. I will not repeat that evidence which I believe clearly demonstrates that this 24 hour gambling establishment does not meet the objectives of the Gambling Act 2005 particularly when considering the following grounds:

- Preventing gambling being a source of crime or disorder, being associated with crime or disorder, or being used to support crime;
- Preventing children and other vulnerable persons being harmed or exploited by gambling.

I am very concerned that the evidence shows that there is a serious risk to a further increase in crime and anti social behaviour in the Palmers Green high street area.

I would also highlight the following factors relating to children and vulnerable persons:

- Palmers Green was in the top 40% deprived wards in England in 2019 and 2020, along with the neighbouring wards of Bowes and Southgate Green;
- There is an NHS Recovery House, supporting adults in crisis or experiencing mental health issues, in close proximity;
- The location is next to a bus stop, used by local school children. There are two local schools within a short distance and the bus stop is on the route used by many secondary school age children travelling to and from other schools in Enfield. It is also close to a McDonalds frequented by many young people. Children and young people will be exposed to gambling on a daily basis as a result.

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• There are two pubs very close, as well as several cafes and restaurants. The location at the centre of the high street is passed not only by those shopping and using the eateries, but also by those using the railway station, those using the nearby soft play area and Broomfield Park.

Local residents in Palmers Green have worked with businesses to improve and support the local high street and to make it a more pleasant environment for the community. As the country emerges from the current lockdown with high street businesses having suffered so much and facing many challenges in the near future, I would like to see everything possible being done to encourage a thriving local economy for both retail and hospitality. There is already a cluster of four existing betting shops near 292-292a Green Lanes. I have no doubt that the opening of a 24 hour gambling centre in the heart of the high street will be highly detrimental to the local economy, and will have an adverse impact on the local community and economy.

My concern about this gambling premises licence has caused me to raise this issue in Parliament.

I presented a petition of the residents of Enfield Southgate to the House of Commons calling on the Government to urgently revise the legislation on the application notice requirements for a gambling premises licence on basis that the current provisions are wholly inadequate. I have also asked for a review of gambling premises licences granted during the lockdown period on the basis there were no additional provisions to notify the public of applications during a time when the public were legally required to go out only for essential purposes. I am awaiting the response of the Department for Digital, Culture, Media and Sport.

I am also concerned about the limited powers Local Authorities and Licensing Authorities have to refuse gambling premises licences even where there is substantial local opposition or where there is already a clustering of gambling establishments. I made a submission to the Gambling Act Review which concluded in March 2021 expressing my support for local Licensing Committees being able to consider and refuse an application taking in account the benefit to the local community, strength of objections from the local community, clustering of gambling premises and the general character of the locality.

I trust the Licensing Sub-Committee will consider all the evidence submitted very carefully, included representations made by the local community, and will revoke this gambling premises licence.

Yours faithfully

Rambos

Bambos Charalambous MP

LONDON ASSEMBLY LABOUR

Enfield Licensing licensing@enfield.gov.uk (By Email)

Joanne McCartney AM

City Hall The Queen's Walk London SE1 2AA

Switchboard: 020 7983 4000 Minicom: 020 7983 4458 Web: www.london.gov.uk

Our ref: JM/JP Date: 14 May 2021

Dear Licensing,

RE: Merkur Slots, 292 - 292A Green Lanes, Palmers Green, London, N13 5TW

I am writing to you as I have received a number of complaints regarding the proposed application for an adult gaming centre at 292/292a Green Lanes N13 5TW made by Merkur Slots.

I welcome this opportunity to comment on this application. I am aware that local residents were concerned that given the timing of the consultation, they were unaware of this application and therefore the first many heard of the application was when it had been granted.

I would like to object to his application for the following reasons:

- There is already a concentration of existing betting shops on the local high street, no more are needed or wanted
- There is a great deal of strength of opposition in the local community which has come together to oppose this application
- This is a local high street where many secondary school pupils gather at the end of the school day and who
 might be attracted to such a venue
- We need to make sure that our local high streets thrive, especially in recovering from the Covid-19 Pandemic, a gambling venue will detract from this aim
- There is real concern that these premises will attract anti-social behaviour, increase debt issues amongst vulnerable people and will blight the area.

Thank you for the opportunity to respond to this review of the application and I hope the points I have raised will be considered.

Yours sincerely,

Joanne McCartney AM

-/.M Chuy

London Assembly Member for Enfield and Haringey

Direct telephone: 020 7983 5524 Fax: 020 7983 4953 Email: joanne.mccartney@london.gov.uk

IP96 Representation

Submission for review of the Bingo Licence - Merkur Slots from the Stop PG Merkur Slots Campaign

We are a group of local residents who formed the campaign group, 'Stop PG Merkur Slots, to oppose the license granted to Merkur Slots to open a bingo and slots premises at 292-292A Green Lanes. This is a very unwelcome addition to the Palmers Green neighbourhood and will have a negative impact on efforts to improve and regenerate the high street.

We are submitting the following objections for consideration by the Licensing Committee:

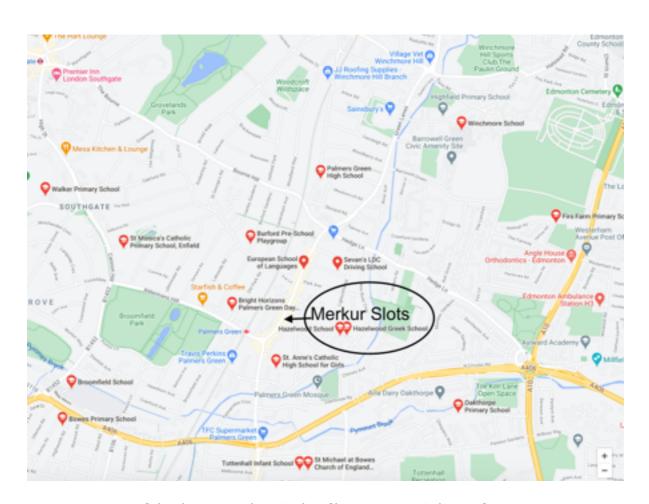
Protecting Children and other Vulnerable Persons from being harmed or exploited by gambling

LOCATION

The location of the proposed Bingo/Gaming premises is in the heart of the Palmers Green shopping area. Footfall here is predominately families and local residents. This area is particularly popular with children and young people. The bus stop immediately outside the proposed premises is very busy, and used by children attending the local schools and those attending Palmers Green High School, Highlands, Southgate School and Southgate College. It is especially busy at beginning and end of the school day. There are also a number of local schools nearby: Oakthorpe Primary School, Hazelwood Primary School and St Ann's Catholic Secondary School. The position of the Merkur premises is also on a major thoroughfare for children and young adults going to Palmers Green Station, Broomfield Park and the library. There is also a children's soft play and events venue minutes away in the Lodge Drive car park and the Explore Learning Centre. The Job centre, Alfred Herring and McDonalds are also close by and attract young people and vulnerable adults. Groups of young people particular congregate around McDonalds. Young people will be waiting for buses and a gambling premise will inevitably attract their attention and curiosity. They will also be mixing with those using the premises gathering outside to meet up or smoke. This will reinforce the notion that gambling is a normal, legitimate part of everyday life as well as making it appear alluring and exciting and not the harmful or addictive activity it has been proved to be.

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. Although it will be claimed that the business operates an over 18's only policy, it remains a bad example to young people in the heart of our community.

We are very concerned about this gambling premises 'normalising' gambling for children and young people. They will be exposed to it on a daily basis and we submit that this particular location is completely unsuitable because of the harm to our vulnerable and young people.



Schools surrounding Merkur Slots venue in Palmers Green

We a note that this concern is highlighted in the Report from the Gambling Related Harm All Party Parliamentary Group, June 2020:

' 1.7% of 11-16 year olds are classified as problem gamblers and 2.7% as 'at risk' gamblers47. That 1.7% equates to approximately 55,0007 11-16 year olds in England, Scotland and Wales and for boys in

particular the prevalence of problem gambling is three times that of the population at large. Many of the measures outlined in this report would better protect children, young people and vulnerable adults from harm. These include greater restrictions on advertising including via social media, a crackdown on the 'normalisation of gambling', the relationship between sports and gambling firms and better identity, age and verification checks

Given the risks to young people from gambling we very much welcomed the inclusion of gambling related harm in the NHS Long-Term Plan and the announcement on 24 June 2019 that the NHS is to open its first gambling clinic for children and young people. The new clinic for young people will open this year in London as part of an expansion of NHS services across England. Fourteen other clinics for adult gambling addicts are set to open.'



Merkus Slots will be positioned by the most central bus stop used by children and young people on the way to school

Evidence supporting the concern about normalising gambling for young people.

https://care.org.uk/news/2018/06/new-report-highlights-gambling-is-being-normalised-for-young-people

https://www.bbc.co.uk/news/business-46286945

https://www.theguardian.com/society/2020/mar/27/children-more-likely-to-become-gamblers-due-to-high-volume-of-betting-ads

http://www.gamblingcommission.gov.uk/PDF/RGSB-Gambling-and-children-and-young-people-2018.pdf

MENTAL HEALTH

There is a mental health resource, Recovery House Enfield, nearby at 449-451 Green Lanes, [http://www.beh-mht.nhs.uk/services/recovery-house-enfield/212] offering short term support for people in crisis, including people with addiction issues. We note that this was not mentioned in Merkur Slots Local Area Risk Assessment. The Priory Hospital, Grovelands House, The Bourne is also located in the neighbourhood and is a centre for treating addictions, including gambling.

The proximity of the Merkur premises presents a serious risk to the vulnerable people they are supporting. The addictive nature of gambling is well documented. This bingo/slots premises will also encourage the vulnerable in our area and persistent gamblers to gamble putting themselves at risk. It is not, as Merkur portrays, a social, fun, inclusive activity.

We would emphasise these concerns about gambling related harm and the impact on mental health by highlighting the following extracts from the Report from the 2020 Gambling Related Harm All Party Parliamentary Group, June.

Scale of gambling related harm

'We agree with the proposition that problem gambling in the UK should be treated as a public health issue. New research from YouGov, commissioned by the charity GambleAware, estimates that up to 2.7% of adults in Great Britain, or nearly 1.4 million people, are 'problem gamblers'. While caution has been voiced over these figures and some suggest that the true addiction rate is likely to be closer to the health survey figures of 0.7% cited by the Gambling Commission, the findings still indicate that the number of problem gamblers may be

significantly above current estimates. The report also found that as many as 7% of adults, or 3.6 million people, report having been negatively affected by someone else's gambling problem. Overall, the research suggests that nearly 5 million British people have experienced harm linked to gambling, even accounting for the overlap between problem gamblers and those they affect.

In an article in the British Medical Journal25 the widely respected academic who specialises in the field of treating gambling addiction, Dr Henrietta Bowden-Jones OBE, Director of the National Gambling Clinic, stated that "pathological gambling is a serious public health problem. Around half a million people are pathological gamblers but an estimated two million are at risk of developing the illness, defined as repeated gambling that causes significant negative financial, social, and personal consequences. As with other addictions, genetic vulnerability interacts with environmental factors and people whose parents gambled when they were young are at higher risk of becoming pathological gamblers.

.... At the clinic in London run by Dr. Bowden Jones, which the APPG has visited, to help those with gambling addiction, the average patient has lost over £150,000, half have lost a partner, and 84 per cent of them have committed some illegal act to support their gambling. Other leading clinicians in the field such as Dr. Matt Gaskell identify this as 'gambling disorder.' [pp 23 -24]

....Dr Matt Gaskell, Consultant Psychologist & Clinical Lead at the NHS Northern Gambling Service has advised that when looking at online gambling harm, it is instructive to look at the top three most prevalent products that addiction patients use:

- 1) In-Play Sports Betting
- 2) Slot Machines (online and land-based)
- 3) Roulette (principally digital roulette)

These games, he says, have harmful characteristics in common, and they are

associated with the largest gambling losses and problem gambling. He has noted to us that these games:

"Are immersive, keep gamblers in continual play betting frequently, provide

frequent reinforcement, lead to excessive play without the time to reflect,

cloud their judgement and decision making, & confuse them about their

probability (known as gambler's fallacy) of winning and ability to influence

this (known as the illusion of control). They undermine the concept of 'responsible gambling'.

My patients tell me they are immersed in continual play, usually at high

speed, with highly frequent opportunities to bet, getting a quick result,

motivating them to bet again with no time to reflect. [p32]

Gambling and suicide

'Problem gamblers are significantly more likely to attempt suicide, according to a study commissioned by GambleAware, which found that problem gamblers were six times more likely to have suicidal thoughts or try to take their own life and could be 15 times more likely to do so.' [p29]

http://www.grh-appg.com/Online-Report

We would also like to highlight the following by Ben Chapman who has written extensively in The Independent about gambling related harm, particularly the addictive nature of slot machines.

'Some academics argue that slots games are even more addictive than electronic roulette. They are certainly lucrative, now accounting for around 40 per cent of bookies' gambling machine revenue, and growing.

What's the big deal you might argue? With stakes at just a couple of quid, there's no harm. It's pocket change; a bit of fun.

A fair point on the face of it, but consider this: at £2 a spin, the average slot machine game takes a gambler's money at roughly the same rate as playing electronic roulette (aka an FOBT) at £50 a spin.

These very same slot machines, complete with rapid spins, flashing lights, repetitive music and cartoons are also available in 1,800 gambling arcades and more than 100 casinos, 24 hours a day, seven days a week.

Slot machine games let you bet eight times as rapidly and take about three times as much of each bet as roulette.

When it comes to cutting FOBT stakes to £2, addicted gamblers won't need to find a workaround as they will still be able to lose money rapidly on the same machines in bookmakers.

While the public may be under the impression that "crack cocaine" betting machines have in effect been turned into much less harmful fruit machines, this is not the case.

FOBT machines run two types of games only one of which is affected by the new stake limit. That category, known as B2, typically takes the form of roulette.

But the same machines are also allowed to run slot machine-style games – category B3. The latter category lets players bet eight times faster and jackpots are just as high as £500. It also takes a much bigger cut of their winnings.

Slot machine games will still be available in bookmakers and casinos

Gamblers lose money on slot machine games at £2 stakes just as quickly as on FOBT games at £50 stakes, raising questions as to why only one type of game was targeted.

A third of the total lost on FOBTs is already lost on slot machine games which will be completely unaffected by the new policy, DCMS [Department for Digital, Culture and Media] concedes.

Given the availability of these games on the same machines, the amount lost on slots seems likely to rise when stakes on roulette are drastically cut.

The Gambling Commission said it had advised the government that slot machine games at low stakes were equally as harmful as roulette at high stakes but DCMS decided to focus exclusively on one type.

Last month, the Gambling Commission rushed out a call to evidence on the harm from other types of machines but it has no indication of when any findings will be published or any action taken.

A commission spokesperson said: "Our advice to the government's gambling review was based on the best available evidence and focused on reducing the risk of gambling-related harm.

"Our recent call for evidence builds on our advice that a stake cut for B2 gaming machines does not address the risk of harm presented by other categories of gaming machines.

https://www.independent.co.uk/voices/fixed-odds-betting-terminals-betting-gambling-slot-machines-mps-a8635796.html

BEING A SOURCE OF CRIME AND DISORDER, BEING ASSOCIATED WITH CRIME AND DISORDEROR BEING USED TO SUPPORT CRIME AND DISORDER

We are also concerned that opening a gambling premises is likely to exacerbate crime in the area especially robbery, shoplifting and vehicle crime as people seek to source funds.

The nearby MacDonald's is already an area where people congregate and is associated with anti-social behaviour. The Merkur Bingo premises is so close to this location and will draw more people to hang around in this area and exacerbate the existing problems.

People gathering outside the premises to smoke and meet up, as well as those possibly coming from the nearby Wetherspoons when it closes, will cause congestion in an area where there is already the bus stop and the cycle lane. This could make older, vulnerable people, women and those with children feel uncomfortable and later at night, possibly intimidated. It is not clear how many staff will usually be on the premises as Merkur slots can operate with single staffing. We do not feel a single member of staff can adequately oversee what is going on inside and outside the premises as well vetting ages and monitoring for problem gamblers. The recently published report by the House of Lords: *Gambling Harm - Time for Action* has raised a number of concerns about lone working which have been highlighted in Cllr Caliskan's submission.

https://publications.parliament.uk/pa/ld5801/ldselect/ldgamb/79/79.pdf

We would also draw the committee's attention to a concern, raised in the 2020 report by the Gambling Related Harm All Party Parliamentary Group, about the underfunding and lack of resources for The Gambling Commission. This would also apply to the Local Authority and must impact on capacity to monitor and inspect premises.

Meanwhile, the regulator itself, the Gambling Commission, has also come under increasing scrutiny in recent months. It was heavily criticised in an unusual intervention by the National Audit Office (NAO), the Government's own Auditor in its recent report. The NAO noted that the Gambling Commission is effectively being outrun by betting companies and warned that the Gambling Commission is struggling to protect people from gambling-related harm.........

The report also notes that there is insufficient funding for Gambling Commission, which has an annual budget of £19m but is expected to regulate an industry that took £11.3bn from gamblers last year. [p16]

http://www.grh-appg.com/Online-Report

This evidence is submitted on behalf of the Campaign Group, Stop PG Merkur Slots by:

