Please reply to: Cllr Nesil Caliskan
Email: cllr.nesil.caliskan@enfield.gov.uk
Phone: 020 8379 4116
Date: Wednesday 14 April 2021

Dear Enfield Licensing Authority

Re: Letter of Support – Merkur Slots Licence Review

As an interested party, I am applying for a review of the premises licence granted to Merkur Slots at 292-292A Green Lanes.

I am completely opposed to any new betting shops or gambling premises opening in Enfield and remain concerned about their impact on local communities and high streets. Palmers Green already has a significant cluster of betting shops however the local authority does not have the power to prevent the concentration of betting shops and other gambling activities.

With local residents and ward councillors, supporting evidence has been collated to demonstrate that this particular licence in our view does not meet the objectives of the Gambling Act 2005. My application for a licence review is being sought on the two 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
2. Protecting children and other vulnerable persons from being harmed or exploited by gambling

This application to review the premises licence is also supported by the MP for Enfield Southgate, Enfield Council Cabinet Member for Licensing & Regulatory Services, Palmers Green residents and all three Palmers Green ward councillors. Below, I have outlined my own concerns about the addition of this type of business to Palmers Green town centre:

Impact on town centres and high streets

Betting shops and gambling venues are a blight on our town centres. They encourage behaviour that has a negative impact on individuals, families and our communities. Town centres should be inclusive, attractive and safe places for residents and visitors of all ages. We also want to rebuild our local economy after the devastating impact of COVID-19 and help both businesses and residents to thrive. I do not believe that allowing such gambling activities is the right way to re-open our high streets and town centres.

Tackling crime and anti-social behaviour

The representations I have received from local residents raise valid concerns about a potential increase in anti-social behaviour and crime in the area. I share these concerns and believe a venue with a 24 hour licence will have a negative impact on safety in the area. Enfied Council is already investing in tackling crime and anti-social behaviour and the proliferation of these types of businesses undermines the work we are doing to keep residents safe. I am especially concerned that the 24 hour element of this licence will make it difficult to prevent crime or disorder associated with problem gambling. Furthermore a 24 hour venue will naturally put additional strain on policing resources.

Protecting children and vulnerable people

I am concerned that the addition of another business in Palmers Green which promotes gambling activity will cause harm to children and vulnerable people in the area. I do not believe that the risk assessment completed by Merkur Slots sufficiently sets out how it will protect children and vulnerable young people from being harmed or exploited by gambling. While controls such as age verification may prevent children from entering the venue, it does not prevent the gambling related harm that affects children and families. The Merkur Slots address is located less than a ten minute walk from two schools and is directly next to a well used bus stop, and I am concerned that any potential crime or disorder linked to the premises will pose a risk to local children and vulnerable people passing through or spending time in the area.

Poverty and inequality in Enfield

The past year has been very financially challenging for families. Gambling adversely impacts on the poorest communities and the clustering of gambling activities and betting shops in an area where deprivation exists is entirely inappropriate. Enfield is a borough where more and more households are living in poverty, including Palmers Green. The Palmers Green ward is within the top 40% most deprived wards in the country and we know that during the pandemic, financial hardship and debt has worsened for many households. Town centres and high streets should not be places where people are encouraged to get into debt.

Palmers Green and wider community response

There has been an overwhelming negative response from the local community in Palmers Green and surrounding neighbourhoods at the prospect of this business opening. Local residents have voiced their opposition through writing to their councillors, created petitions and written to me directly. I am yet to receive any support for this business opening. Residents are at the heart of feeding into our plans for developing and regenerating our town centres and they want to see their town centre thrive. It is important that their views are taken into account.

It is disappointing that local authorities have limited powers to prevent the clustering of gambling businesses and are unable to control gambling related harm. As a Council we have raised this in the recent government consultation and will continue to highlight our concerns about the impact of gambling on the safety our town centres and local communities. In their consultation response, the Local Government Association has called on the Government to reform the Gambling Act so that local authorities are able to determine whether it is appropriate for new gambling premises of any type to open in their areas.

I hope that this application provides a strong case for revising the premises licence that has been granted to Merkur Slots to ensure that it does not cause crime and disorder and it does not cause harm to children or vulnerable people.

Yours sincerely

Cllr Nesil Caliskan
Enfield Council

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1 Ground for review number one: preventing gambling from being a source of crime or disorder

The addition of another business offering gambling in Palmers Green is concerning because of the risk that crime and disorder will increase due to the gambling activities offered and the potential criminal behaviour connected to this location on the high street. Crucially, Palmers Green already has a significant cluster of betting shops, as identified in the Enfield Council Local Area Risk Profile.

The latest crime and anti-social behaviour statistics for the ward are enclosed to demonstrate the risk that the addition of a new business offering gambling activities will cause an increase in crime and disorder in the area, especially due to the 24 hour aspect of the licence. Crime rates in this area have been rising in the last few years. Most reported crimes in the past 6 months include anti-social behaviour, vehicle crime, violent and sexual offences, burglary, shoplifting and other theft. In June 2020 there were 198 crime incidents reported within half a mile from the Merkur slots postcode predominantly consisting of anti –social behaviour (72) violence and sexual offences (39) vehicle crime (23).

1.1 Palmers Green crime and anti-social behaviour data

a. Domestic abuse incidents

Tables 1 and 2 – domestic abuse incidents in Palmers Green ward[1]

Palmers Green - Domestic Abuse Incidents 1st Mar 2018 - 29th Feb 2020					
Month	2018/19	2019/20	Total	Diff	% Change
Mar	10	20	30	10	100%
Apr	9	11	20	2	22%
May	9	18	27	9	100%
Jun	12	12	24	0	0%
Jul	20	10	30	-10	-50%
Aug	19	16	35	-3	-16%
Sep	17	17	34	0	0%
Oct	14	19	33	5	36%
Nov	29	18	47	-11	-38%
Dec	27	17	44	-10	-37%
Jan	20	8	28	-12	-60%
Feb	13	12	25	-1	-8%
Total	199	178	377	-21	-11%

Palmers Green - Domestic Abuse Incidents 1st Mar 2019 - 28th Feb 2021					
Month	2019/20	2020/21	Total	Diff	% Change
Mar	20	16	36	-4	-20%
Apr	11	12	23	1	9%
May	18	27	45	9	50%
Jun	12	31	43	19	158%
Jul	10	25	35	15	150%
Aug	16	27	43	11	69%
Sep	17	19	36	2	12%
Oct	19	23	42	4	21%
Nov	18	23	41	5	28%
Dec	17	23	40	6	35%
Jan	8	21	29	13	163%
Feb	12	6	18	-6	-50%
Total	178	253	431	75	42%

Comparison with Enfield borough wide performance:

- 2018/19 to 2019/20 Enfield increased by 3.6% / London increased by 2.7%.
- 2019/20 to 2020/21 Enfield increased by 12.8% / London increased by 7.6%.

[1] *Source: https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/data-and-statistics/domestic-and-sexual-violence-dashboard and internal restricted Police MetaStats*

It is important to acknowledge that there is an established link between domestic violence and gambling. Enfield has seen increasing numbers of domestic abuse incidents reported to the police during the past year. The spike in cases last year was linked to the lockdown however we know that gambling and financial problems are linked to domestic violence.

A 2016 report by the University of Lincoln found that those who gamble are more likely to act violently towards their partner, with 45% of participants struggling with problem gambling having been in some form of physical fight in the last 5 years. We also know that 25% of women and 14% men in the UK experience domestic abuse during their lifetime, and that only a minority of this is reported to the police.[2]

b. Personal robbery

Tables 3 and 4 – personal robbery offences in Palmers Green ward[3]

Palmers Green - Personal Robbery 1st Mar 2018 - 29th Feb 2020					
Month	2018/19	2019/20	Total	Diff	% Change
Mar	3	3	6	0	0%
Apr	3	9	12	6	200%
May	1	7	8	6	600%
Jun	2	5	7	3	150%
Jul	3	10	13	7	233%
Aug	2	5	7	3	150%
Sep	4	10	14	6	150%
Oct	7	7	14	0	0%
Nov	7	7	14	0	0%
Dec	3	5	8	2	67%
Jan	5	2	7	-3	-60%
Feb	6	4	10	-2	-33%
Total	46	74	120	28	61%

Palmers Green - Personal Robbery 1st Mar 2019 - 28th Feb 2021					
Month	2019/20	2020/21	Total	Diff	% Change
Mar	3	2	5	-1	-33%
Apr	9	7	16	-2	-22%
May	7	4	11	-3	-43%
Jun	5	3	8	-2	-40%
Jul	10	5	15	-5	-50%
Aug	5	3	8	-2	-40%
Sep	10	3	13	-7	-70%
Oct	7	0	7	-7	-100%
Nov	7	1	8	-6	-86%
Dec	5	4	9	-1	-20%
Jan	2	4	6	2	100%
Feb	4	1	5	-3	-75%
Total	74	37	111	-37	-50%

Borough wide performance:

- 2018/19 to 2019/20 - Enfield increased by 41.5% / London increased by 19.4%.
- 2019/20 to 2020/21 - Enfield decreased by 51.1% / London decreased by 42.4%.

[2] *Source: https://www.gamcare.org.uk/news-and-blog/blog/ending-violence-against-women/*
[3] *Source*: https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/data-and-statistics/crime-dashboard

c. Anti-social behaviour

Tables 7 and 8 – anti-social behaviour calls to police in Palmers Green ward[4]

Palmers Green - Police Recorded Antisocial Behaviour Calls 1st Mar 2018 - 29th Feb 2020					
	2018/19	2019/20	Total	Diff	% Change
Total Calls	440	525	965	85	19%

Palmers Green - Police Recorded Antisocial Behaviour Calls 1st Mar 2019 - 28th Feb 2021					
	2019/20	2020/21	Total	Diff	% Change
Total Calls	525	899	1424	374	71%

Borough wide performance:

- 2018/19 to 2019/20 - Enfield increased by 5.6% / London increased by 10%.
- 2019/20 to 2020/21 - Enfield increased by 92.2% / London increased by 86.7%.

Palmers Green is the 10th highest ward for anti-social behaviour reports in the borough for the time period monitored. In the past year, Enfield increased by 92.2% in the same period London increased by 86.7%.

Crime and anti-social behaviour hot spots in the area

This part of Green Lanes is already an area where people congregate, and the Local Area Risk Assessment produced by Merkur Slots identifies that this area has a high crime and anti-social behaviour rate. This type of establishment would encourage more congregating and potentially attract an increase in criminal or anti-social behaviour in this part of Green Lanes and in the town centre.

The Merkur Slots address is very close to the Alfred Herring Wetherspoons pub which attracts crime and anti-social behaviour. It is also nearby to the McDonald's which is an area where people congregate and is associated with anti-social behaviour.

There is no established night-time economy in Palmers Green and local residents, especially women, children and other vulnerable people may feel unsafe passing through this area especially as this is a transport hub with a nearby train station and a bus stop right outside the Merkur Slots address.

[4] *Source: https://data.police.uk/*

d. Palmers Green - All Crime from 2017-2020

All Palmers Green Crime
Recorded between 01/01/2017 and 28/02/2021

Crime Type	Years					Grand Total
	2017	2018	2019	2020	2021	
Violence Against the Person	3	7	8	9	3	30
Sexual Offences	2	0	4	3	0	9
Robbery	1	1	4	1	0	7
Vehicle Offences	6	4	15	16	1	42
Theft	13	10	18	14	2	57
Burglary	2	2	0	2	0	6
Arson and Criminal Damage	5	5	0	2	1	13
Drug Offences	1	1	0	3	1	6
Public Order Offences	2	2	7	4	0	15
Miscellaneous Crimes Against Society	1	1	0	0	0	2
Grand Total	**36**	**33**	**56**	**54**	**8**	**187**

Provided via FOI to Met Police

This data demonstrates that levels of crime have been rising in Palmers Green during the past few years. Due to this trend, this area is an extremely unsuitable location for another business offering gambling.

1.2 Palmers Green demographics and risk factors

Palmers Green population

The population of Palmers Green ward is 15,837 (ONS mid-year estimates 2019). This is the 9th largest population of the 21 wards in Enfield. Palmers Green is the main town centre serving the population of Palmers Green ward, but the town centre also serves nearby neighbourhoods including Winchmore Hill, Bowes and Southgate Green wards.

Palmers Green wider area

It is important to note that the Merkur Slots address is in the Palmers Green ward however the Palmers Green area, and the community which bases itself around Palmers Green, is much wider. The Palmers Green area encompasses the town centre which serves bordering neighbourhoods in Southgate Green, Winchmore Hill and Bowes. As a town centre, Palmers Green is a transport, community and retail hub which serves a wide area including Palmers Green ward and beyond.

Within the evidence presented, both the Palmers Green ward and the Palmers Green area are referred to. This is to capture the fact that Palmers Green town centre serves the wider area and any evidence or discussion about the impact of the gambling licence in this part of Green Lanes should not be limited to the ward itself, as this would not capture all of the people who are part of the local community and area.

Deprivation in Palmers Green ward and the local area

The Local Area Risk Assessment completed by Merkur Slots quotes that in 2019 the deprivation score for Palmers Green was in the 50% least deprived in the country. This is incorrect, in 2019 Palmers Green was in the 40% most deprived in the country. The Merkur Slots risk assessment should be updated to reflect the correct 2019 score and also note that the 2020 deprivation score for Palmers Green was again in the top 40% most deprived wards in England. Furthermore, for many families, the financial hardship caused during the pandemic will continue well into 2021 and beyond. The control factors put in place by Merkur Slots should address the level of deprivation in Palmers Green because this is relevant for mitigating against risks relating to crime and disorder.

The bordering wards of Bowes and Southgate Green are also in the 40% most deprived in the country. These wards are part of the wider Palmers Green area and the communities which the Palmers Green town centre serves.

Employment levels and claimant count

Unemployment in Palmers Green ward is higher than the national average which adds to the vulnerability of local people to gambling, and any crime or disorder which is linked to gambling.

Data for furlough is available at the parliamentary constituency level. Palmers Green is in the Enfield Southgate constituency, which also includes the nearby areas of Bowes, Southgate and Winchmore Hill.

At 28 February 2021, 9,500 Enfield Southgate employments were furloughed – this is 21% of all employments. Since the start of the government furlough scheme, 19,500 employments have been furloughed (this number includes those where the furloughs have ended – either by redundancy or by employment restarting). Currently 19% of all Enfield employments and 15% of all employments in England are in the furlough scheme (as at 28th February 2021). This demonstrates that the Enfield Southgate constituency is higher than both the Enfield and national average.

At July 2020:

- The claimant count[2] in Palmers Green was 860, representing 8.1% of the local working-age population.
- 21% of households in the ward (1,312) were claiming Universal Credit – this includes working households.

The risks associated with this are further explained in the second part of this evidence submission, relating to vulnerable persons.

1.3 Impact of a twenty-four-hour licence

The 24-hour element of this licence could exacerbate problem gambling and increase the risk of crime or anti-social behaviour which is associated with problem gambling.

This type of establishment will encourage the congregating of people outside the premises, like the Paddy Power does and also gives another outlet for the drug dealers in the area to work from, as is the case with the Paddy Power on weekend nights.

1.4 Staffing

The Merkur Slots Risk Assessment states that they may operate a single staff policy and it is not clear how many staff will usually be there. Single staffing is not enough to deter crime and disorder, both inside and immediately outside the business.

The recently published report by the House of Lords: *Gambling Harm – Time for Action* raises the following concerns about lone working in betting shops:

Dr James Banks, Reader in Criminology at Sheffield Hallam University, raised concerns about the practice of lone working in betting shops. He stated that to prevent gambling from being a source of crime or disorder (one of the licensing objectives) “I would encourage LBO [licensed betting office] operators to abolish lone working, with a view to reducing the likelihood of robbery and the risk posed to retail staff.”

His evidence explained that analysis of the robberies committed in betting shops showed that although crimes were committed across betting shop opening hours, “many of the robberies took place in the evening when neighbouring shops will have closed and fewer people will be present either in the shop or the surrounding vicinity.”

To mitigate the risks for both lone-working staff and the individual betting shops involved, Dr Banks suggested: “… previous research has demonstrated that greater numbers of ‘frontline’ staff or the introduction of specialised security personnel into retail environments where there is only a small volume of staff can serve to reduce the occurrence of violent crime.”

Similar concerns were expressed in January 2017 by the Responsible Gambling Strategy Board. In its advice to the Gambling Commission for the 2017 DCMS review of gaming machines and social responsibility measures, it said: “Appropriate staffing levels are key to the detection and mitigation of harmful play. There must be serious doubt about the extent to which a single member of staff on their own in a betting shop, even at less busy times of the day or night, can simultaneously look after the counter, remain alert to the possibility of under-age play and money laundering, and still be expected to identify potentially harmful play and make appropriate interventions. The Gambling Commission should ask all operators to review safe staffing levels. Larger operators should be required specifically to address staffing levels and safety (of employees as well as players) in their annual assurance statements.”

2 Ground for review number two: protecting children and other vulnerable persons from being harmed or exploited by gambling

2.1 Location risk factors for children and vulnerable persons

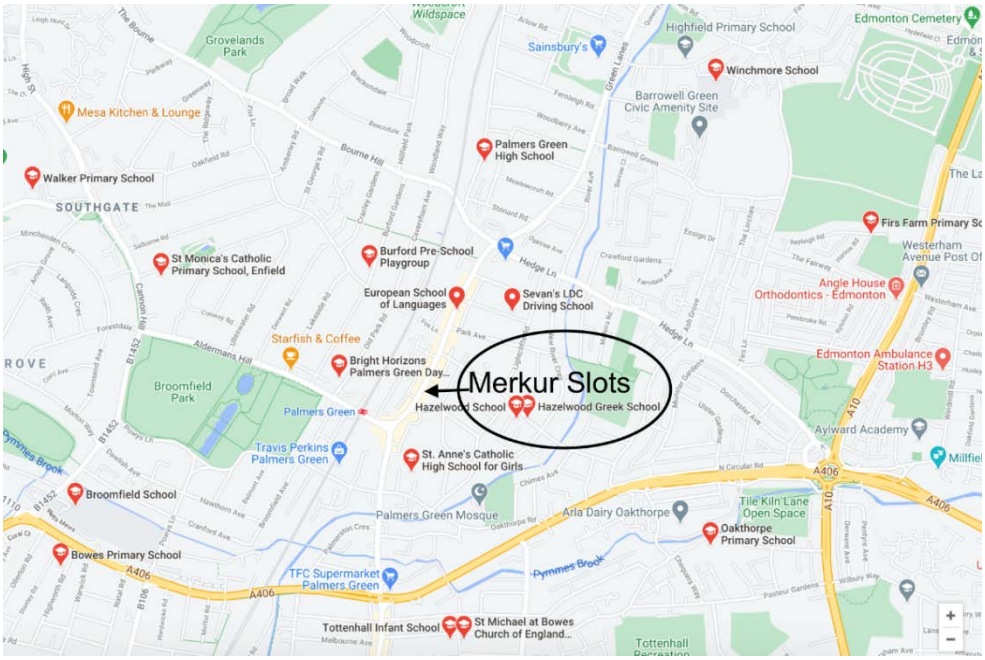
The location of the proposed Merkur Slots gaming centre is in the heart of the Palmers Green town centre and shopping area. Footfall is predominately families and local residents. This area is popular with children and young people and is a major throughfare for many children and vulnerable persons visiting places of interest which are listed below.

a. Proximity to schools

The location of the proposed Merkur Slots gaming centre is less than half a mile, and less than a ten-minute walk, from two schools: Hazelwood School and St Anne's School. The area has a higher than national average number students and there are over ten schools in the local area, highlighting the need to ensure the town centre is safe for pupils travelling through and spending time in the area.

While the risk of children gambling is addressed in the Local Area Risk Assessment by implementing control measures such as age verification, this does not prevent children from being impacted by any crime or anti-social behaviour linked to customers frequenting the premises or local area. It also does not mitigate against the impact of children whose family are affected by problem gambling or gambling addiction.

Image 1 – Schools in Palmers Green and the wider area



b. Proximity to places where children and/or vulnerable persons visit and congregate

Transport

The Lodge Drive bus stop is immediately outside the Merkur Slots address. The bus stop is very busy and used by children attending the local schools and those attending Palmers Green High School, Highlands, Ashmole Academy, Southgate School and Southgate College, to name a few. It is especially busy at beginning and end of the school day. A gambling premises with highly colourful and illuminated signage will inevitably attract the attention of young people waiting for buses and provoke curiosity. Peer pressure and the vulnerabilities of children and young people can magnify the effects of this.

Image 2 – Lodge Drive bus stop in front of 292-292A Green Lanes

The location of the Merkur premises is also on a major thoroughfare for children, young adults and vulnerable persons going to Palmers Green Station.

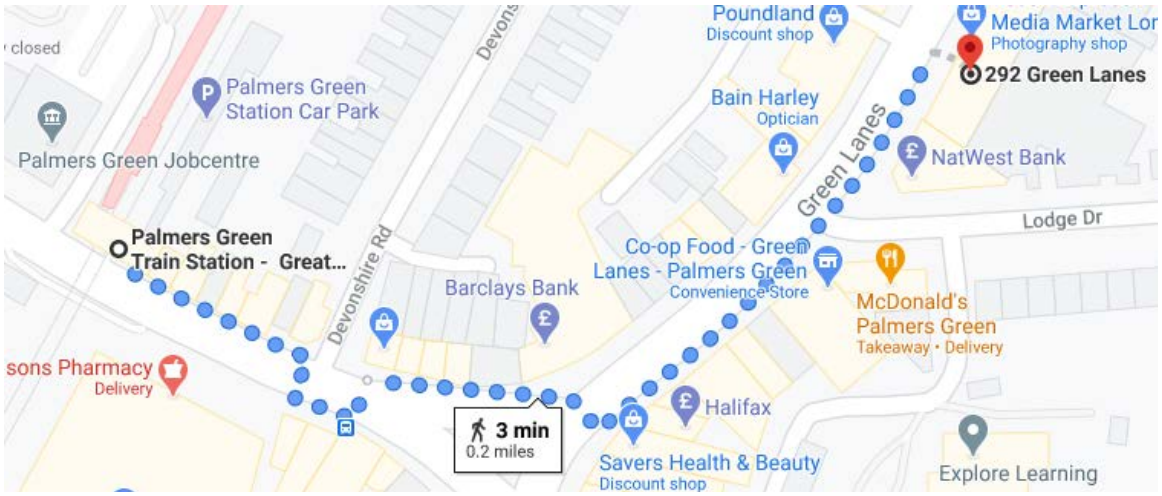


Image 3 – Route between Palmers Green train station and Merkur Slots at 292-292A Green Lanes

Eateries and pubs

The Merkur Slots location is near several eateries where children and vulnerable people often visit or pass by in this area of Green Lanes. The Alfred Herring Wetherspoons Pub and the McDonalds branch on Green Lanes are businesses which are nearby and attract young adults and vulnerable adults. Groups of pupils and young people particularly congregate around McDonalds.

Images 4 and 5 – distance between Merkur Slots and the local McDonalds and Wetherspoons

Palmers Green Jobcentre

The Merkur Slots address is located nearby to the Palmers Green Jobcentre. There are potentially vulnerable persons unemployed or on low incomes who are visiting the area. Furthermore, the Merkur Slots risk assessment notes that Palmers Green has higher than average unemployment.

At July 2020:

- The claimant count in Palmers Green was 860, representing 8.1% of the local working-age population[5].
- 21% of households in the ward (1,312) were claiming Universal Credit – this includes working households.

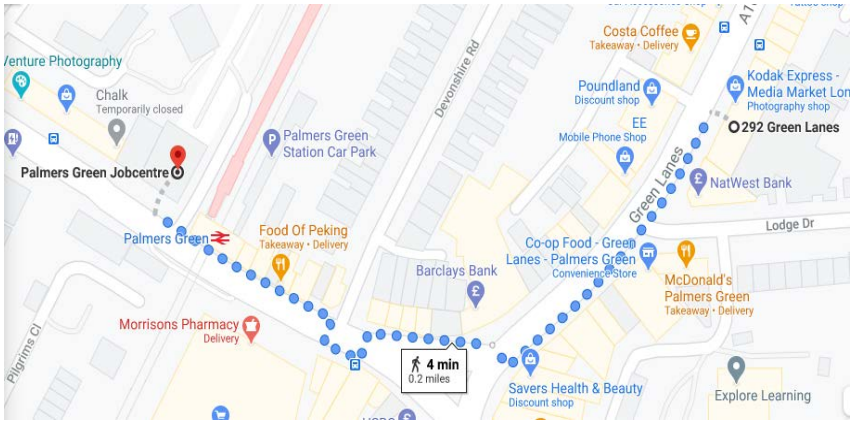


Image 6 – Distance from Merkur Slots to Palmers Green Jobcentre

[5]*The claimant count is a measure of unemployment: the number of people receiving either Job Seekers' Allowance, or unemployed claimants of Universal Credit who are required to seek work.*

Nearby businesses for families, children and vulnerable persons

Within minutes of the Merkur Slots address and Lodge Drive bus stop are the Explore Learning Centre and the KB02 children's soft play venue.

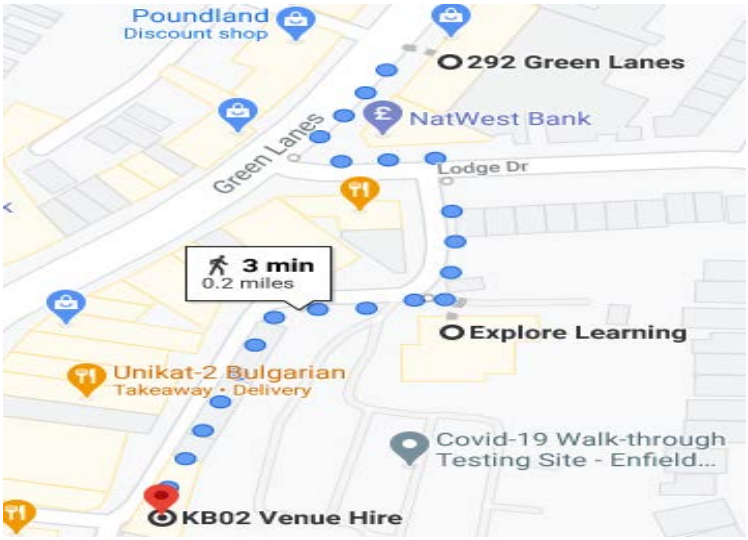
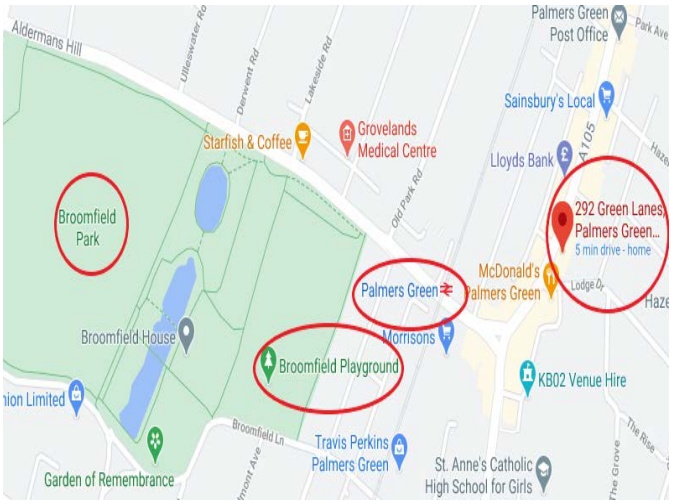
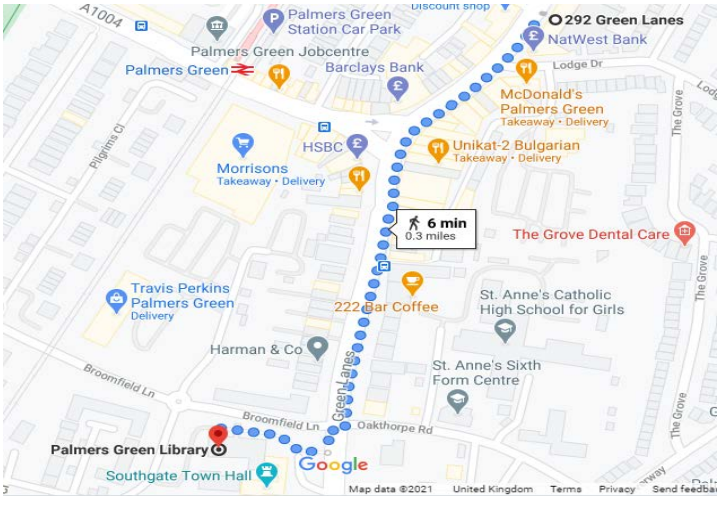


Image 7 – Distance between Merkur Slots and Explore Learning and KB02

The location is half a mile to Broomfield Park which has a sportsground and playground used by local children and families visiting from the local area. It is also on a major thoroughfare for children and young adults going to the Palmers Green Library, which is just a six-minute walk away from the Merkur Slots address.





Images 8 and 9 – distance from Merkur Slots to Broomfied Park and Palmers Green Library

There is an NHS Crisis Prevention and Recovery House nearby at 449-451 Green Lanes which is not listed in Merkur Slot's risk assessment. This service provides short-term residential support for people with mental health problems or in a crisis. MedStar Social Services is based at 200 Green Lanes, a service supporting vulnerable adults. In total, there are 22 medical centres, care homes and mental health facilities in the wider area. The NHS Crisis Prevention House, as well as the other health services, will naturally draw people with vulnerabilities into the area who are at a greater risk of being affected by problem gambling or any crime or disorder in the area.

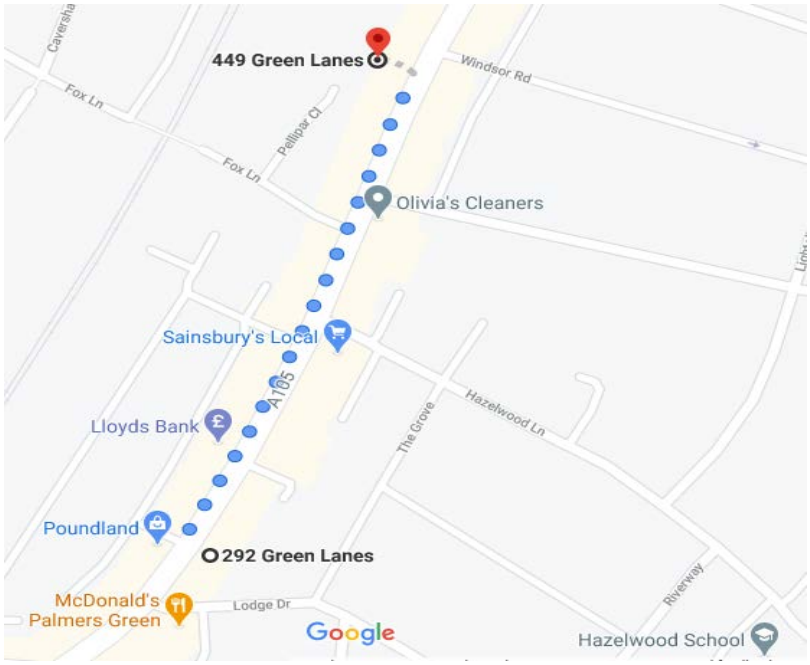


Image 10 – distance between Merkur Slots and NHS Crisis Prevention House

2.2 Dangers of gambling: children and vulnerable persons

The activities offered by Merkur Slots encourage risky behaviour and problem gambling. It is important that the activities offered by Merkur Slots are distinguished from other leisure or entertainment activities, and to note the well documented dangers associated with gambling activity. Crucially, these are activities which potentially put both gamblers and their loved ones at risk, especially children and vulnerable people who may be more at risk of the harm and impact from problem gambling.

There are 3,611 children aged 11-16 years in Palmers Green and the surrounding areas (Southgate Green, Bowes and Winchmore Hill). The risks associated with children's exposure to gambling is well documented and below, compelling national research has been benchmarked against the Palmers Green area.

Government information indicates that in the UK there are over 400,000 addicts (or "problem gamblers") with a further 2 million2 "at risk"[6]

Palmers Green has a large population at 15,837 and is the 9th largest ward population in Enfield. As well, Palmers Green is one of the main town centres which serves the borough, meaning residents from across Enfield visit, work or spend time in the area. In such a large population, it must be anticipated that a proportion of adults in the area will be gambling addicts.

1.9% of 11-16-year olds in England and Scotland are classified as 'problem' gamblers and 2.7% are classified as 'at risk'[7]

This has increased since 2017. In 2017, 0.9% of 11-16 year olds are classified as 'problem' gamblers, 1.3% as 'at risk' and 15.5% as non-problem gamblers.

In 2020, 37% of 11-16-year olds in England and Scotland gambled in the last 12 months[8]

The number of young people aged 11-16 years old in who have gambled in the last 12 months has **increased by 30%** since 2019.[9]

In 2020, 9% of 11-16-year olds in England and Scotland spent their own money on gambling activities in the seven days prior to taking part in the survey[10]

This has reduced slightly from 2019 however the number of young people who gambled in the last 12 months has significantly increased (30%).

As there are nearly 4,000 children aged 11-16 years in Palmers Green and bordering wards, this is a significant group of people who are at risk of engaging in some way with gambling or problem gambling – or being impacted negatively by problem gamblers.

2.3 Public Health Implications

Gambling disorder was classified as equivalent to drug and alcohol addictions in 2013. Currently, the NHS does not fund specialised treatment services for problem gambling despite the fact that compulsive gambling is recognised by the World Health Organisation under ICD-11 (International Classification of Diseases, 11th edition) as a Mental and Behavioural Disorder. A report by Gamble Aware found fewer than 2 per

[6] NatCen for the Gambling Commission (2017) Gambling behaviour in Great Britain in 2015: Evidence from England, Scotland and Wales: http://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-behaviour-in-Great-Britain-2015.pdf
[7] https://www.ipsos.com/ipsos-mori/en-uk/2020-young-people-and-gambling-survey
[8] Ibid.
[9] https://www.ipsos.com/ipsos-mori/en-uk/2019-young-people-gambling-survey
[10] https://www.ipsos.com/ipsos-mori/en-uk/2020-young-people-and-gambling-survey

cent of problem gamblers are receiving treatment, representing a significant gap in the provision of specialist services.[11] This is lower than the treatment received for drug and alcohol addictions which is 15-20%.

2.4 Impact on Mental Health

Betting shops, bingo halls or adult gambling centres are often located in areas where residents are impacted by poor mental health. The Local Area Profile for Enfield identifies that there are greater concentrations of betting shops are located along the Hertford Road corridor, with particular clusters in Edmonton Green, Enfield Town and Southgate. There are also significant clusters of betting shops along Green Lanes, in the Bowes and Palmers Green centres. Figure one demonstrates how in Enfield, betting shops have been clustering in areas of poor mental health.

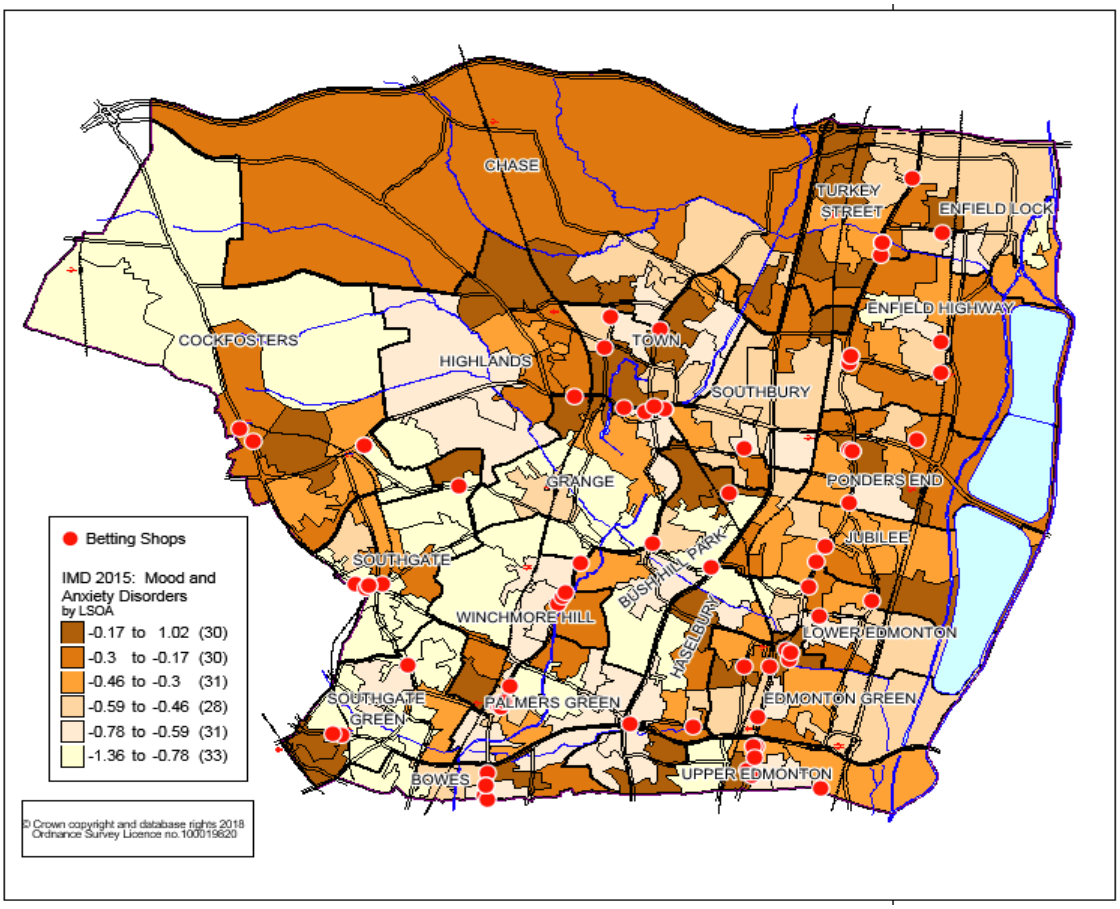


Figure 1 – Mental health mapping of Enfield with concentration of betting shops (Enfield Local Area Profile 2019)

Worryingly, recent research has shown a strong link between gambling problems and thoughts of suicide. More than double the amount of people affected by gambling problems say that they have considered taking their own life compared to those who are not affected by gambling.[12]

[11] https://www.begambleaware.org/media/1628/gambleaware-annual-review-2016-17.pdf
[12] https://www.begambleaware.org/media/1978/summary_gamblingandsuicide.pdf

There is an NHS Recovery House located at 449-451 Green Lanes which is not included in Merkur Slot's own Local Area Risk Assessment. This service offers accommodation and support to adults in a crisis or struggling with mental health. It is unacceptable for another business offering gambling activities and potentially attracting criminal behaviour, to be in such proximity to people with vulnerabilities or poor mental health.

2.5 Clustering of existing betting shops on Green Lanes

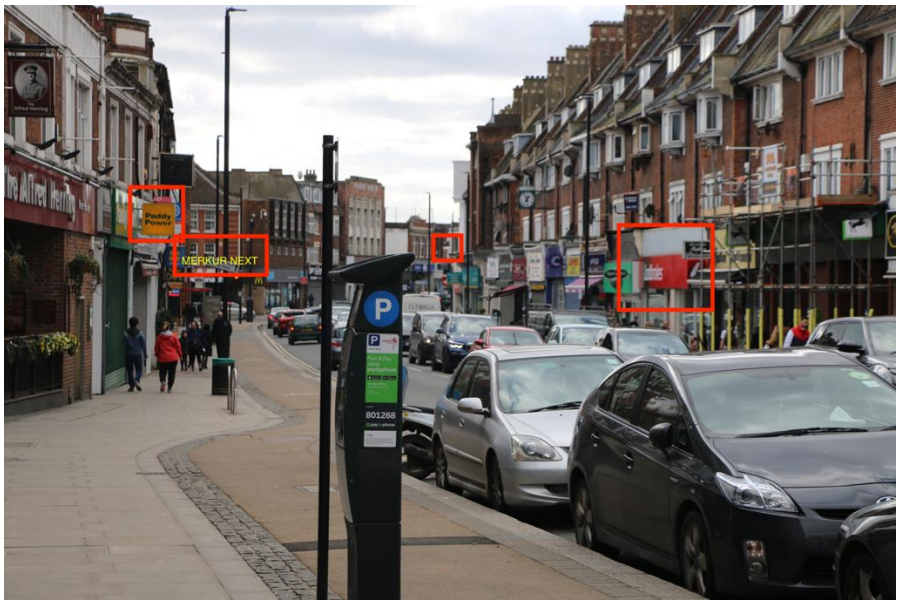


Image 11 – Betting shops nearby on Green Lanes

Betting shops in the area:

- Ladbrookes at 363 Green Lanes N13
- Ladbrookes at 402 Green lanes N13
- Paddy Power at 314 Green lanes
- Betfred at 319 Green Lanes

There are already a number of betting shops in the area and the addition of a business which promotes gambling will have a negative impact on children and vulnerable persons who spend time in the area or who are directly affected by problem gambling.

The opening times of all premises listed above are 7am to 10pm daily because the default position is that gambling facilities may not be offered in betting premises between the hours of 10pm on one day and 7am on the next day, on any day.

There is also a pawnbroker, Cashpoint Pawnbroker, nearby at 12 Aldermans Hill which adds to the number of businesses which are harmful for vulnerable people.

Supporting information and letters

1. Enfield Council response to Department for Culture, Media and Sport consultation on the Gambling Act 2005

2. Local Government Association response to Department for Culture, Media and Sport consultation on the Gambling Act 2005

3. Palmers Green Ward Councillors letter of support

4. Copy of the letter from Councillor Caliskan sent to local residents about Merkur Slots

5. Addendum from local residents about the initial licence consultation

6. Copies of emails from residents against Merkur Slots opening, sent to Councillor Caliskan

Please reply to: Cllr Nesil Caliskan
Leader of the Council
Email: cllr.nesil.caliskan@enfield.gov.uk

Phone: 020 8379 4116

Date: Wednesday 31 March 2021

Nigel Huddleston
Minister for Sport, Tourism and Heritage

Sent via email to:
gamblingactreview@dcms.gov.uk

Dear Mr Huddleston

Re: DCMS Gambling Act Review – Call for Evidence

Thankyou for inviting a review of the Gambling Act which is much needed. We are responding to this consultation on behalf of the Council and residents of Enfield.

We can confirm that this response may be published in connection with this review.

Overall comments

Our overarching concern is that we have minimal ability through the Gambling Act or planning legislation to limit gambling premises and to support our residents in their concerns about clustering, proliferation and impact of gambling premises. This is of particular concern as the borough experiences some of the highest levels of deprivation and poverty. Despite the covid pandemic, over the last year we have seen more applications for gambling premises than we have received for some time. This is of grave concern to us particularly as the borough seeks to support the vitality of our high streets and their recovery from the pandemic.

We support the aim to make gambling safer for both the players and the general public, especially of the most vulnerable, and to strengthen powers available to the local authority in decision making.

Stifled ability in decision making

The London Borough of Enfield has a large, diverse and growing population. Too many of our residents face significant economic and social challenges in their lives. They experience some of the highest levels of unemployment, lowest levels of income, deprivation and child poverty.

Enfield is within the top 25% of the most deprived local authorities in England, with many wards being in the top 10-20% most deprived wards nationally. Deprivation in the borough is worsening with Enfield now the 9th most deprived London Borough (2020), rising from

14th in 2010 and 12th in 2015. Most of the wards in Enfield have a child poverty score worse than the London and England average.

As our Local Area Profile in our Gambling Policy shows, many of the premises licensed for gambling are concentrated in the areas of our borough with the worst deprivation, poorest mental health, highest unemployment rates and highest number of working age benefit claimants. These are potentially our poorest and most vulnerable residents.

Whilst as a Council we continue to endeavour to 'place make', regenerate our borough and improve the quality of our residents' lives, we are practically powerless to restrict gambling premises under the Gambling Act (or planning legislation). The Gambling Act requires Councils to 'aim to permit' gambling such that it is extremely difficult to refuse a licence despite objections and high levels of community concern. Unlike alcohol control, where the harms are readily apparent in drunken behaviour and nuisance, problem gambling is less visible and have devastating impacts on the person, their relationships, their family, their health and cause significant debt. There is no 'aim to permit' requirement in the Licensing Act regime.

There is also no ability under the Gambling Act to control the concentration of gambling premises (ie 'clustering' of betting shops) like there is with a 'cumulative impact' policy for alcohol licensed premises under the Licensing Act in which we can take into account the impact of nearby pubs etc on the local neighbourhood (such as nuisance, crime and antisocial behaviour).

Looking holistically at town planning, the new London Plan 2021 highlights concerns around betting shops and suggests that the concentration and proliferation of these uses should be carefully managed through development plans and decisions to supporting the vitality and viability of the borough's centres. The ability to adopt a restrictive approach to harmful uses can help to achieve these objectives.

Worrying recent trend

Enfield currently licences 71 betting shops, 5 bingo premises and 3 adult gaming centres. Since March 2020 (i.e. the first covid lockdown), one betting shop licence has been surrendered, yet three new bingo premises licences and two new adult gaming centres have applied for licences. Prior to covid, there were relatively few new applications. It is of great concern to us that gambling premises intensifies further at a time when the Council is seeking to support the recovery of our high streets which have been hit hard by the pandemic.

In addition, we have noticed a worrying new trend developing with bingo premises licences, in that the bingo relates to online machine play rather than the 'traditional' bingo halls but still having a premises (presence) on the high street. The default position in the Gambling Act for online machine play for bingo is to permit this activity 24 hours per day. This means that whilst bingo on the premises is required to cease at midnight, in reality

the premises can continue to be open to allow bingo machine play online 24/7. There are no restrictions in the Gambling Act on the opening hours of these premises. Our communities find it incomprehensible that a Council have to 'allow' 24 hour online bingo machines.

GamCare is the leading provider of information, advice and support for anyone affected by gambling harms. GamCare's annual review in 2019/20 reported that 69% of problem gamblers use online gambling and 38% use bookmakers. Gamcare also reported receiving more calls to their helpline and treating more clients with gambling problems than the previous year. The greatest number of calls from problem gamblers to their national helpline came from London. GamCare also reported that within bookmakers, gaming machines were the most common form of gambling (53%).

We recognise that problem gambling can affect all genders, all age groups and ethnicities. Enfield has a very diverse population of 22 different ethnic groups. It is noteworthy that the GamCare report (2019/20) identified that compared to White gamblers, those who identified as Black or Black British were more likely to use betting shops (54% compared to 37%), and those that identified as Asian or Asian British were also more likely to use betting shops (49%) than White clients.

All these Gamcare findings are directly relevant to Enfield's population:

- Greater use of online gambling,
- Higher numbers of problem gamblers seeking help from London,
- The greater use of betting shops by persons identifying as Black/Black British or Asian/Asian British

Response to some of the specific questions in the Review:

The Gambling Commission's powers and resources

Q19: Is there evidence on whether the Gambling Commission has sufficient investigation, enforcement and sanctioning powers to effect change in operator behaviour and raise standards?

A19: During the last 2 years, when enforcement officers share intelligence with the Gambling Commission, the response has been that there are insufficient resources to pursue matters. Up until 2019, this authority conducted regular successful joint operations with the Gambling Commission. Without this support and expertise, the licensing authority have not been able to maintain the same level of operations.

Q21: What evidence is there on the potential benefits of changing the fee system to give the Gambling Commission more flexibility to adjust its fees, or potentially create financial incentives to compliance for operators?

A21: This question relates to Gambling Commission fees, but it is important to comment here that the fees set by Licensing Authorities for Gambling Act applications are also capped and have not changed since 2005. The Gambling Act fees should also be reviewed to allow licensing authorities the ability to set fees to reflect local costs, or at the very least be increased nationally.

Land based gambling

Q43: Is there evidence on whether licensing and local authorities have enough powers to fulfil their responsibilities in respect of premises licenses?

A43: No - licensing and local authorities do not have sufficient powers to control gambling in their boroughs. Please see all the comments earlier in this response.

63% of Enfield's betting shops are located in the most deprived wards in the borough where the highest number of incidences of crime associated with betting shops occur. 20% of the betting shops within the borough are located in the three of wards (Edmonton Green, Upper and Lower Edmonton), that are amongst the 10% of most deprived wards nationally.

Neither the licensing nor the planning framework provides Councils with effective powers to limit the number of gambling premises in their areas, and many gambling premises, particularly betting shops were established long before the Gambling Act 2005.

The Gambling regime in particular legally requires Councils to 'aim to permit' gambling premises, and so is a fundamental obstacle in refusing applications where gambling is not welcomed, and/or does not meet wider regeneration plans for local areas.

There is also no ability under the Gambling Act to control the concentration of gambling premises (i.e. 'clustering' of betting shops) as there is with a 'cumulative impact' policy for alcohol licensed premises under the Licensing Act in which you can take into account the impact of nearby pubs etc on the local neighbourhood (such as nuisance, crime and antisocial behaviour).

Introducing powers to limit the number of gambling premises within a defined area would be a very welcomed tool to address local concerns more effectively.

All the new applications we have received during the Covid-19 pandemic (mentioned above) have been granted, four by delegated authorisation due to no outstanding representations, and one application was determined at a hearing by the Licensing Sub-Committee due to objections from a local resident group.

Following the grant of these new applications, residents have since become aware of the applications and reported their concerns and object to the application process and the

licence being granted. Residents comment that they have been complying with Government guidelines to “stay at home”, therefore the opportunity for residents to observe the application site notice displayed on a premises was severely reduced, and the newspaper article advertising requirement cannot guarantee it reaches the potentially affected audience.

The licensing authority can confirm that the advertising requirements were met for these applications but can also understand the public perception that the process is unfair as a result of no amendment to the legislation covering advertising during lockdowns and the pandemic. A Government direction regarding advertising of licence applications to reflect the lockdown and pandemic circumstances would have been welcomed to ensure fairness and openness was achieved.

Conclusion

The current gambling and planning legislation provide Councils with insufficient powers to respond to the concerns raised by local residents, which appear to be greater in voice and numbers than those who appear to benefit from the gambling premises.

Councils need greater powers to control clustering and proliferation of gambling premises (such as a cumulative impact policy in the Licensing Act 2003). The fees also need to be increased or set locally. We also call on the Government to remove the ‘aim to permit’ requirement in the Gambling Act which stifles local decision making.

Yours sincerely

Cllr Nesil Caliskan
Leader of the Council

Cllr George Savva
Cabinet Member for Licensing & Regulatory Services

Review of the Gambling Act 2005 Terms of Reference and Call for Evidence - LGA response

March 2021

Submission

About the Local Government Association (LGA)

- The Local Government Association (LGA) is the national voice of local government. We work with councils to support, promote and improve local government.

- We are a politically-led, cross party organisation which works on behalf of councils to ensure local government has a strong, credible voice with national government. We aim to influence and set the political agenda on the issues that matter to councils so they are able to deliver local solutions to national problems.

Key messages

- The LGA welcomes the review of the Gambling Act 2005 (the Act) given the significant changes to the gambling landscape since the Act was first introduced, most notably with the shift to online or remote gambling from more traditional land-based operations such as high street betting shops.

- Since the Act came into force there have also been changing trends in the physical presence of gambling in local areas. Betting shop clustering has been a significant concern for councils and the public. Our view is that councils should have greater powers under the Act to determine whether it is appropriate for new gambling premises of any type to open in their areas.

- Although online gambling is outside the scope of councils' regulatory role in gambling, it is an issue that councillors and the LGA are concerned about. The LGA would support the introduction of measures to reduce the volume of gambling advertising, particularly where it is seen by children, for example the advertising of sports betting during live sport, as well as greater controls around sponsorship. Past experience has shown that it is possible for sports which are heavily reliant on tobacco sponsorship to continue to thrive without this income, and we believe the same outcome is possible for sporting activity currently closely linked to the gambling industry.

- Harmful gambling is another issue that many local authorities have concerns about. Whilst councils do not have a direct role in treatment, this is a local public health issue and there are several ways in which councils can try to support those individuals and families who are experiencing harm from gambling. The LGA has been supporting councils to develop a better understanding of gambling related harm and the role councils can play to identify and support residents who are affected by it.

- The LGA has called for the Government to introduce a mandatory levy on the gambling industry to fund research, education and treatment. This view is supported by other organisations, including GambleAware, the charity responsible for minimising gambling-related harm.

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020 7664 3000 info@local.gov.uk www.local.gov.uk
Local Government Association company number 11177145
Improvement and Development Agency for Local Government company number 03675577

Detailed Response

Online protections - players and products

Since the Act was introduced technological developments mean that significant numbers of people now gamble remotely, so it is right that a key focus of the review is on the protection of online gamblers.

Although online gambling is outside the scope of councils' regulatory role in gambling, it is an issue that a number of LGA members have expressed concern about.

We share concerns that the current system of online protections is not sufficiently effective at preventing gambling harm. There is evidence of gamblers being able to spend very large sums of money which they cannot afford in short spaces of time without effective operator intervention, leading to devastating effects for individuals and their families.

It is apparent that these large losses generate a large proportion of profits for online gambling businesses. Recent research conducted by the National Centre for Social Research (NatCen) commissioned by GambleAware revealed that the five per cent of online accounts with the highest losses generated a minimum of 70 per cent of Gross Gambling Yield (GGY) in each of betting, virtual casinos, live casinos, and slots.

It is incumbent on the gambling industry to ensure that the wide availability of online gambling is offered in a fair and responsible way. Account based play offers remote operators a firm basis for identifying harmful patterns of play and losses, and therefore to step in and help address it. Recent fines levied by the Gambling Commission indicate that the remote industry is failing to fulfil its obligations in this regard. For example, an assessment of an online gambling operator as part of the Gambling Commission's ongoing compliance work earlier this year revealed failures in social responsibility procedures meant one customer was able to loose £50,000 in just six hours and another lost £85,000 in just over one hour.

Unlike in land based premises, there are currently no stake limits online and so the review should consider whether stake limits should apply consistently across games played on all gambling platforms, including remote gambling, rather than simply to non-remote gambling premises.

There is also the need for gambling regulation to be flexible enough to respond to emerging technology and new forms of online gambling. There is growing concern that children and young people are being exposed to gambling in new ways, for example through in-game purchases and lootboxes which currently fall outside regulation. We are aware that government has consulted on the experience of video game players and the functioning and potential harm of loot boxes and in-game purchases following a recommendation by the DCMS Select Committee that these products should be regulated. However, there needs to be a mechanism for regulation to quickly respond to new types of gambling in order to protect children from harm. With this first review of the Gambling Act taking place some fifteen years after the Act was first passed, it is not clear that we have mechanisms in place to respond as quickly as needed.

We support the new regulatory requirement for all online gambling operators to participate in the multi-operator self-exclusion scheme and Government should commit to reviewing progress in this area once GambleAware's evaluation of the impact of this has concluded.

We also support the use of the Gambling Commission's Licensing Conditions and Codes of Practice to establish mandatory standards in this area, and encourage the Commission to keep a close eye on the use of promotional offers which can draw people into online gambling.

Advertising, sponsorship and branding

As with online gambling, while gambling advertising is outside councils' regulatory role, the volume of gambling advertising is nevertheless an issue that a number of councils feel strongly about.

The LGA has previously called on Government to take steps to restrict the volume of gambling advertising, particularly where it can be seen by children – for example, during televised or live sport as well for greater control on sponsorship.

While we recognise that there has been a reduction in the number of gambling advert impacts since 2013, the number of gambling advert impacts on children in 2016 remained almost twice as high as in 2007 (when the Gambling Act came into force), and for adults, more than three times as high.

There has also been a shift in focus to advertising online and via social media. Analysis commissioned by GambleAware estimated that in 2017, the gambling industry spent £1.5bn on advertising and marketing, around 80 per cent of which was through online channels.

In terms of the impact of advertising on vulnerable groups, GambleAware recently commissioned research to look at the impact of gambling advertising and marketing on children, young people and vulnerable adults. The findings of the research were published in March 2020 and showed that gambling is now seen as part of everyday life for these groups. The research also revealed a link between exposure to gambling advertising and attitudes towards the prevalence and acceptability of gambling which increase the likelihood that a child, young person or vulnerable adult will gamble in the future. The research also found that children are regularly exposed to gambling advertising on social media platforms.

We welcome the measures around advertising on social media which require operators to comply with the Advertising Codes, administered by the Advertising Standards Authority (ASA) however further evidence about the impact of online advertising on children, young people and those vulnerable to problem gambling should be commissioned and the review should explore how exposure to online advertising, including on social media can be tackled. Our view is that more should be done beyond the promotion of responsible gambling messages.

Sponsorship is also a significant channel for gambling brand marketing. Betting companies sponsor sports teams and events, including shirt sponsorship and have forged deals with sports bodies and individual clubs. In 2020 half of Premier League clubs and 17 of 24 Championship clubs were sponsored by bookmakers. These commercial arrangements are a significant source of income for British sports and teams, particularly horse racing and football teams.

Whilst we welcome the 'whistle-to-whistle' ban on gambling advertising from five minutes before to five minutes after a match, this is of limited use when viewers, including children, are exposed to gambling advertising on shirts and on perimeter hoardings. The LGA would support consideration of a ban on gambling sponsorship

of sports club shirts and sporting events, similar to the previous introduction of a ban on tobacco sponsorship.

We also urge Government, in relation to both online gambling and online advertising, to look at ways of ensuring that technology and content providers build safeguards into their products to prevent children and young people viewing gambling advertising and accessing gambling sites and apps.

The Gambling Commission's powers and resources

Councils work in partnership with Gambling Commission to regulate gambling and have close relationships including through the Commission's regional compliance officers, a role which has recently been removed as part of the ongoing restructure.

Compliance officers gave advice and support to councils with the development of local statements of gambling policy, inspections of gambling premises as well as with training. This support was valued by council officers and the Commission must have the resources to continue to support councils in this way.

Consumer Redress

Government should engage with Trading Standards to discuss any potential changes to consumer redress arrangements.

Age limits and verification

We have limited evidence about the effectiveness of age controls, protections for young adults, and the age limit for society lotteries. However, the LGA was concerned by widespread evidence of failure to prevent under-18s from playing on category C gaming machines in pubs following a piece of work by the Gambling Commission. This is a marked contrast to the test-purchase pass rate for alcohol and the sector needs to ensure responsibilities for age verification for gaming machines are taken as seriously as for alcohol sales.

Robust measures to prevent illegal underage gambling online are vital. We welcome new requirements introduced by the Gambling Commission for online gambling operators to verify the age and identity of their customers before players can deposit money and access any free to play games which took effect from May 2019. However, the review should look at evidence for how effective these new controls are in preventing young people from accessing age restricted content.

Land based gambling

Betting shop clustering has been a significant concern for councils and the public and the LGA has called for additional powers to restrict the opening of new betting shops in areas where there are already clusters.

The statutory aim to permit within the Act has allowed for the clustering of betting shops which has had an adverse impact on the communities and areas in which they are clustered. Evidence shows that clusters are typically located in more deprived areas, where the harm from problem gambling may be exacerbated: *'areas close to betting shops tend towards higher levels of crime events, resident deprivation, unemployment, and ethnic diversity…[*and*] players overall tend to live in neighbourhoods with higher levels of resident unemployment, multiple deprivation and economic inactivity.'*

Currently licensing authorities have a contradictory mix of powers under the Gambling Act, with the ability to prevent the opening of local casinos, but because of the statutory aim to permit no real power to prevent the opening of other premises even if they feel that they are already saturated with them.

The LGA's view is that councils do not have the full powers that they need to effectively manage local gambling premises. There should be more local flexibility within the Act for democratically elected councillors to make decisions about the number of local gambling premises if such decisions can be shown to be in the interests of the local economy and community. We would support the ability for councils to control the numbers of premises in a given area, for example in the same way as cumulative impact areas work for the Licensing Act 2003. This would prevent the proliferation of any single type of gambling premises in an area - such as betting shops, Adult Gaming Centres (AGCs) or bingo halls.

Whether through a cumulative impact assessment or other tool, the review should consider a new legal power that in specific circumstances can act as a break on the statutory aim to permit to tackle existing clusters of premises. Local statements of principles are a helpful tool to manage local gambling premises, but do not provide this.

The profitability of Fixed Odds Betting Terminals (FOBTs) and restriction to four machines per shop has helped to drive betting shop clustering in some areas. Whilst stake reductions have helped reduce the issue of clustering there is some evidence that councils have seen an increase in the number of new applications for Adult Gaming Centres (AGCs) and bingo premesis which are seeking to take over betting shops.

Rules that link the permitted number of B3 and B4 gaming machines sited on an AGC or bingo premises to 20 per cent of the total number of gaming machines made available for use has meant that in practise these premises can have a much larger number of higher stakes machines than a betting shop could. For example, a recent application for a bingo premises licence in a deprived area of Leeds was made for a bingo hall alongside 38 gaming machines, as well as electronic bingo. Whilst the traditional bingo hall operation would be welcomed as a supervised social outlet the council was concerned about the number of machines on offer but under current legislation were not able to control the number of machines offered or the type of bingo variant on offer. The review should look at whether a proportionate approach to machines in these types of venues is appropriate and whether these should be replaced by specific limits, or limits which councils can determine locally.

We do not agree that the threshold at which local authorities need to individually authorise the number of category D and C gaming machines in alcohol licensed premises should be increased. Children are not permitted to play Category C gaming machines in pubs and staff are expected to stop children playing on the machines however tests on a sample of pubs in England in 2018 indicated that almost 90 per cent failed to prevent children accessing 18+ gaming machines.

Problem gambling

Whilst councils do not have a direct role in the provision of treatment for gambling related harm, it is increasingly seen as an issue that requires a public health approach and is something that many of our Members have concerns about. Problem gambling can impact on individuals and their families' physical, mental and emotional health and wellbeing as well as having a wider impact on society through crime and disorder.

The Health Survey statistics indicate that in 2016, 0.7 per cent of people in England (approximately 300,000 people) identified as problem gamblers, with 3.6 per cent (approximately 1,610,000 people; 6.6 per cent of gamblers) at low or moderate risk based on their gambling. Due to limitations in how this data is collated, it is likely these estimates are conservative, and may not capture some vulnerable population groups such as homeless people and students.

Previous research by Leeds Beckett University for Leeds City Council has concluded that gambling behaviour and problem gambling are not equally distributed across England and that certain areas - such as large urban metropolitan areas - experience higher rates of problem gambling.

The Gambling with Lives charity has also highlighted the link between gambling and suicide, although there is currently a lack of clear evidence to support this.

We are aware that Public Health England (PHE) has been commissioned to undertake a review of evidence on gambling related harm in England including the prevalence, determinants, and harms associated with gambling, and the social and economic burden of gambling-related harms. Evidence from this review should be used to inform government action on gambling related harms. Councils should also have access to data about problem gambling at the local level to inform decision making.

Whilst councils are not responsible for treating gambling addiction, there are several ways in which councils can try to support those individuals and families who are experiencing harm from gambling without taking on responsibility for treatment. This is in addition to their statutory licensing responsibility to try to prevent local gambling premises causing harm through gambling.

The LGA has developed guidance for councils on developing a ‘whole council’ approach to tackling gambling related harm which sets out where councils might be coming into contact with people impacted by problem gambling through a range of services, including housing and homelessness, financial inclusion, children’s services and addiction services. The guidance also explores how councils can work with local partners and build links with support organisations to help develop specific local referral routes and ensure these can be accessed from across the full range of local services.

Councils should ensure that frontline staff are given training, so they recognise potential cases and direct residents to the national treatment network via the National Gambling Helpline. As frontline awareness and identification of harmful gambling develops, councils can develop a better understanding of the extent of the problem, its impacts, and associated costs.

Public health teams can play a role in ensuring that this data, and related data about at-risk groups, is collected and shared. They can also work with local partners and through health and wellbeing boards and clinical commissioning groups to develop a coherent approach to harmful gambling, including focused preventative work.

The LGA supports the introduction of a mandatory levy on gambling firms, to help fund a significant expansion of treatment and support for those experiencing gambling related harm throughout the country. This would help to ensure continuity and security in the funding for these services which would in turn enable planning for the provision of treatment and services. This should be based on the ‘polluter pays’ principle, so those companies and sectors of the market causing the greatest harm

should pay the most. While the commitment from a small number of large operators to increase contributions to one per cent is welcome this should be put on a statutory footing. This view is supported by other organisations, including GambleAware, the charity responsible for minimising gambling-related harm.

Contact
Rebecca Johnson
Adviser (Regulation)
Mobile: 07887 568807
Email: rebecca.johnson@local.gov.uk

14th April 2021

Dear Enfield Licencing Authorities

Re: Application for a review of the premises Licence granted to Merkur Slots

We write in support of Cllr Nesil Caliskan's application for a review of the gambling premises Licence granted to Merkur Slots at 292-292A Green Lanes, Palmers Green, N13 5TW.

This gambling venue is inappropriate to Palmers Green at a time when we want to rebuild our local high street and economy. We want Palmers Green to be safe and healthy - not a place where people are encouraged to get into debt.

We are concerned that increased gambling in Palmers Green with the opening of Merkur Slots will be a possible source of crime. Our Safer Neighbourhood team already have a tough enough job.

Palmers Green is a busy transport hub with children and young adults travelling to and from Green Lanes on their way to local schools or back home. We believe that children and vulnerable adults need protection from being influenced, harmed, or exploited by gambling.

We welcome and support the local campaign which has highlighted just how unwelcome and inappropriate Merkur Slots is to Palmers Green. A view shared with us by many of our ward residents though their letters, emails and social media.

We look forward to an early review of this wholly inappropriate licence.

Yours sincerely

Cllr Mary Maguire Cllr Tim Leaver Cllr Ahmet Oykener

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Enfield EN1 3XY

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Website: www.enfield.gov.uk

If you need this document in another language or format contact the service using the details above.

24 February 2021

Letter from Leader of Enfield Council on proposed gaming centre on Palmers Green High Street

Cllr Nesil Caliskan, Leader of Enfield Council
cllr.nesil.caliskan@enfield.gov.uk

Dear Palmers Green and Winchmore Hill residents,

I am writing to you regarding the proposed **Merkur Slots gaming centre** on Palmers Green High Street. Many local residents have written to me and their ward councillors to express their concerns about the impact of this gambling venue.

I share their concerns and I am completely opposed to any new betting shops or gambling venues opening in Enfield.

Betting shops and gambling venues are a blight on our town centres. They encourage behaviour that has a negative impact on individuals, families and our communities. I want our local high streets to be safe and healthy, not places where people are encouraged to get into debt.

We want to rebuild our local economy after the devastating impact of COVID-19 and to help businesses and residents to thrive. I don't believe that allowing such gambling venues is the right way to re-open our high streets and town centres, nor are they a healthy option when so many families are under significant financial strain.

On 30 November 2020, Enfield Council received an application from a company for a premises licence for gambling at 292/292A Green Lanes. **This company already has an operating licence from the Gambling Commission. The Gambling Commission is the national body responsible for granting licences for gambling companies to operate premises.**

Once a company has an operating licence, it can obtain a premises licence provided they meet the mandatory legal conditions. This licence is governed by the Gambling Act 2005. This requires local authorities to 'aim to permit' gambling premises licences. In practice it is difficult for a local authority to object to such an application because if the application meets the conditions set out in the law, it must be granted. This is deeply frustrating to me and councillors who oppose betting shops and gambling venues.

The consultation period for this licence application ran until 27 December 2020. During this period objections could be made and all responsible authorities were notified as well as ward councillors.

The Metropolitan Police wanted alterations and additional conditions attached to the licence, including CCTV to be installed inside and outside the premises, and for the business to keep an incident logbook to be made available to the police when requested. The applicants subsequently agreed to those conditions.

Enfield Council's Licensing Team was able to initially object to the application on the basis that they were not satisfied with the risk assessment completed by the business. The risk assessment was subsequently resubmitted by the applicant.

While the Licensing Team initially raised objections, the law prevented them from being able to refuse the application. However, utilising the limited powers we do have, Enfield Council attached additional conditions, including regular training for staff and making sure they follow the Challenge 25 policy to prevent under-age gambling.

Enfield Council can only refuse a gambling premises licence if the applicant does not meet the following objectives:

a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
b) ensuring that gambling is conducted in a fair and open way, and
c) protecting children and other vulnerable persons from being harmed or exploited by gambling.

Due to national law, councils do not have effective powers to limit the number of gambling premises in the area. Enfield Council's Licensing and Planning Team has tried to exercise as much control as legally possible in regard to granting licenses to betting shops, within the constraints of the legislation.

In the last few days, I have discussed with officers what steps would be required to initiate a review of the licence. Additional substantive evidence would be required to demonstrate the objectives listed above are not met.

I can confirm that I am working with your ward councillors to collate such evidence. I am supportive of any options for reviewing this licence and oppose the proposed gaming centre.

I would like the licence to be reconsidered and for council officers to refer the application to the Licensing Committee. I would like members of the committee to fully consider the harm associated with betting shops and gambling venues when assessing the licence. As Leader of the Council I have no involvement in the regulatory decisions taken by the quasi-judicial Licensing sub-committee (or function). However, I will provide an update on this in due course.

Enfield Council, as with many local authorities, is extremely frustrated with its inability to prevent the development of clusters of gambling premises and betting shops in their areas. It is not just Palmers Green which is facing this problem. Other areas in Enfield are also facing the same challenge of too many betting shops on their local high street. **This is unacceptable. We will do all we can to oppose them in all parts of Enfield, but we believe that there should be a change in the law to enable us to more effectively control the gambling that is doing such harm to our communities. I would encourage you to join us in writing to the Secretary of State for Justice the Rt Hon Robert Buckland MP at** robert.buckland.mp@parliament.uk **to ask the Government to change the law.**

If there is any other matter you would like to raise with me, please feel free to contact me anytime.

Yours faithfully

Cllr Nesil Caliskan
Leader of Enfield Council

14 April 2021

Addendum from local resident campaign against Merkur Slots

Background

In February 2021, a group of north London residents formed the campaign group Stop Palmers Green Merkur Slots, in response to Enfield Council's decision to grant a gambling licence for a 24 hour Adult Bingo and Gaming Centre, to Merkur Slots, to operate in Palmers Green on Green Lanes. Merkur Slots are a subsidiary of the German gambling and gaming company Gauselmann Group.

With thousands of empty shop units on the British high street - a problem that has been exacerbated by the pandemic - Merkur Slots have seized the opportunity to buy up dozens of former William Hill sites to convert quickly without having to apply for a change of use, to convert them into 24 Hour Adult Gaming Centres. Many communities around the UK have opposed these applications, fearful of the impact these gaming centres could have on children and vulnerable people and the risk of encouraging antisocial behaviour. Concerns have already been raised in Blackburn, Newbury, Huntingdon and Southport.

Planning permission and the licence application was opened on 27th November 2020 with a deadline for objections of 27th December 2020. The licence was approved on 4th January and planning permission granted on 29th January 2021.

Lack of Consultation

This 24 hour licence was granted by the council during a period of exceptional circumstances when London was being subjected to considerable restrictions with the expectation and instructions that people stay at home. **T**he residents of Palmers Green, for these reasons, had no knowledge of the applications for planning and licence and only one objection was raised during the consultation window. This denied local people and businesses the opportunity to have their views represented and the licence was agreed without taking this evidence into an account and without going to committee for discussion, so constituting a serious failure of local accountability and democracy.

Furthermore, local ward counsellors did not alert their constituents to the application – even though many have gone on the record to say they are entirely against the development.

When residents became aware of the development, a petition was started on change.org and has now gathered 4305 signatures; more than a quarter of all Palmers Green residents have now signed.
http://www.change.org/stopPGmerkurslots.

Residents clearly do not want Merkur slots because it brings no benefit to the High St or to the local economy. They are a big company from Germany that essentially work for their shareholders.

A high concentration of betting shops has a detrimental effect on surrounding businesses and drives down the value of the high street as other potential shop tenants don't want to be located near them. So, by definition they can never be part

of a regeneration of the area.

This business risks the survival of the existing hospitality businesses.

Another, unwelcome gambling venue spells the death of the High Street. This in no way benefits any locals and does nothing but attract undesirable people to the area.

It is unsuitable for a residential area and undermines the community. Residents have also questioned why it has to open so late and it is not necessary for them to be granted a 24-hour licence in a family-oriented area. There is no established 24hr night-time economy in Palmers Green.

Alongside the thousands of signatures, hundreds of members of the community wrote to their respective local councillors, the Leader of Enfield Council Nesil Caliskan and local MP Bambos Charalambous (Labour).

This is overwhelming evidence of the strength of local feeling about this issue. The licence was granted without local concerns and objections being taken into account and should be reviewed to enable this deficit to be rectified.

These concerns are shared by our MP. On 23rd February, Bambos Charalambous replied to his constituents by email stating:

'…I share these concerns and agree that a 24 hour Adult Gaming Centre arcade would

be a very unwelcome addition to the night time economy of Palmers Green and would

have a negative impact on efforts to improve and regenerate the high street in

Palmers Green.'

Bambos Charalambous has written to Enfield Council to raise serious questions about

the licencing process and followed up with a letter to Culture Secretary, Oliver Dowden MP,

Secretary of State for Digital, Culture, Media and Sport:

I have raised concerns …about the adequacy of the usual notification requirements during a period of Covid 19 restrictions. I have expressed my concern that the exceptional circumstances should not facilitate an application which is clearly unwelcomed by many and in relation to which many local residents do wish to make representations. The normal notification methods, even if they were compliant with the regulations do not appear to be adequate as a means of notifying the public when access to the high street is limited and the circulation of a small local newspaper even more restricted.

14 April 2021

This issue has also received extensive local Press Coverage:

https://enfielddispatch.co.uk/thousands-oppose-new-palmers-green-gambling-venue/

https://www.enfieldindependent.co.uk/news/19144903.campaign-fifth-gambling-venue-enfield-suburb/r

https://www.pgweb.uk/tags/betting-shops

From the local resident led campaign

From:
To: Cllr Nesil Caliskan
Subject: Cashino Gaming Ltd, Palmers Green High St.
Date: 20 February 2021 10:51:41

Dear Cllr Caliskan,

I have just become aware that Cashino Gaming Ltd. were granted a licence on 29/1/2021, by Enfield Council to convert the ground floor of an existing betting shop to a 24-hour ‘adult gaming centre’ in the middle of Palmers Green High Street.

Here is the report link:

https://planningandbuildingcontrol.enfield.gov.uk/online-applications/files/1FB39E6FAC5777599641596BF7809AE4/pdf/20_03849_FUL-Report-2407234.pdf

This unit which was formerly Store 21, as I am sure you are aware has been an eyesore for years and left dilapidated by the current landlord who seems to take no interest in what is best for the community and the high street. I am now writing on behalf of myself and my family and a number of very upset neighbours and local friends, to ask for your immediate assistance in appealing this decision in the light of the improper method of notice of the application during a period of exceptional circumstances.

The majority of local people are still unaware that Palmers Green shopping centre will be subjected to a 24-hour slot machine arcade with bright neon signs on the outside, under the guise of an application for ‘Bingo’, which is highly misleading and inappropriate for the community we have here of young families.

The full planning application for this gambling centre was submitted by Cashino Gaming Ltd, trading as Merkur Slots on 27 November 2020, a few weeks before Christmas, with a cut-off date of 27/12/20 for objections and representations concerning this application. We understand there was only one objection, as the majority of local residents were completely unaware of the application.

Enfield guidance for notice of application for new premises states that information must be displayed on the outside of the property in question on pale blue paper in a font equal or larger than 16. It should be convenient to read from the exterior of the premises 24 hours a day. We would argue that few people would have seen the white laminated A4 notice on the property which was in an extremely small font and on white paper.

This consultation period, as well as coinciding with Christmas, occurred during exceptional circumstances when COVID 19 was at a peak and people were preoccupied with the pandemic, their safety and in fact were being instructed to 'stay at home' by the Government as supported by Enfield council.

There are already four betting shops on our small high street; (two Ladbrokes, Paddy Power, and Betfred). This is more than enough! With unemployment and youth disengagement at the highest level it has been for years, it is irresponsible for Enfield Council to give its approval to a 24-hour gambling centre. This is likely to profit at the expense of those in society who least can afford it, whilst increasing the likelihood of antisocial behaviour and problem gambling. Moreover, with primary schools only a few minutes walk away from the site, this decision by the planning department is deeply disappointing.

As part of the ‘New Local Plan,’ Enfield was tasked with supporting the community in regenerating our shopping area with innovative and creative ideas, not allow our once thriving High Street to deteriorate into a string of betting shops and amusement arcades. This kind of establishment signals the decline of an area, not regeneration. It will be detrimental to the plans to re-imagine Palmers Green and make it an attractive place to shop and spend leisure time.

We would appreciate your immediate assistance and advice in how best to challenge the license decision for this unwanted development. As far as we can see there has not been due process; the development has not been advertised in line with LBE’s own policy or allowed for the extenuating circumstances we have all been living under. We plead with you to find a way to begin the consultation process again so that residents are given a fair chance to respond.

Regards,

From:
Sent: 19 February 2021 19:05
To: Cllr Nesil Caliskan <Cllr.Nesil.Caliskan@Enfield.gov.uk>
Subject: Objection to Merkur Slots in Palmers Green

Dear Nesil,

As a longstanding resident of Palmers Green, I am shocked, saddened and dismayed to hear the news that Enfield Council has granted a license to open a Merkur Slots gaming centre in the heart of the Palmers Green High Street. This kind of establishment does not belong in a family focused sub-urban area.

Without doubt a slot machine arcade with a 24 hour license will be detrimental to the area and will undo a lot of the positive work that local community groups have been doing to regenerate the high street and make it an appealing place for families to shop and access local amenities.

Furthermore, I think this is a highly irresponsible decision Enfield Council have made. Any benefit such an establishment may bring to the local community would be far outweighed by disadvantages. It will encourage gambling and addiction and given that unemployment levels are on the rise and expect to increase further, I cannot see how such a decision was reached. What kind of example will we be setting the younger generations? This is actually morally wrong.

The planning and licensing application was made in December 2020 during a festive period that fell in the middle of a global pandemic. Residents were rightfully following government advice to stay at home and this drastically reduced opportunities for the community to be properly informed as the notices would not have had the amount of exposure expected in normal circumstances.

Consequently, very few people would have been aware of the application for a 24 hour gambling license and plans for illuminated signage in the short time allowed. Something of this nature, which will have a huge detrimental effect to the residents, culture and ethos of Palmers Green, should have been clearly communicated to residents and residents should have been properly consulted. Residents were not properly consulted or given a chance to raise objections due to the extreme circumstances of the pandemic.

We are proud of our local area and strongly object to yet another gambling establish that is not wanted or needed.

If Enfield Council do proceed with going ahead with this application despite the backlash it is now facing from local residents, they are no more than signalling that they have in fact given up on any regeneration of Palmers Green, and will instead be nailing its degeneration and neglect. I call on Enfield Council to revoke this license and associated planning application with immediate effect.

From:
Sent: 20 February 2021 16:13
To: Cllr Nesil Caliskan <Cllr.Nesil.Caliskan@Enfield.gov.uk>
Subject: Proposed casino in Palmers Green

Dear Councillor Caliskan,

I have just become aware that Cashino Gaming Ltd. were granted a licence on 29/1/2021, by Enfield Council to convert the ground floor of an existing betting shop to a 24-hour 'adult gaming centre' in the middle of Palmers Green High Street.

Here is the report link:

https://planningandbuildingcontrol.enfield.gov.uk/online-applications/files/1FB39E6FAC5777599641596BF7809AE4/pdf/20_03849_FUL-Report-2407234.pdf

This unit which was formerly Store 21, as I am sure you are aware has been an eyesore for years and left dilapidated by the current landlord who seems to take no interest in what is best for the community and the high street. I am now writing on behalf of myself and my family and a number of very upset neighbours and local friends, to ask for your immediate assistance in appealing this decision in the light of the improper method of notice of the application during a period of exceptional circumstances.

The majority of local people are still unaware that Palmers Green shopping centre will be subjected to a 24-hour slot machine arcade with bright neon signs on the outside, under the guise of an application for 'Bingo', which is highly misleading and inappropriate for the community we have here of young families.

The full planning application for this gambling centre was submitted by Cashino Gaming Ltd, trading as Merkur Slots on 27 November 2020, a few weeks before Christmas, with a cut-off date of 27/12/20 for objections and representations concerning this application. We understand there was only one objection, as the majority of local residents were completely unaware of the application.

Enfield guidance for notice of application for new premises states that information must be displayed on the outside of the property in question on pale blue paper in a font equal or larger than 16. It should be convenient to read from the exterior of the premises 24 hours a day. We would argue that few people would have seen the white laminated A4 notice on the property which was in an extremely small font and on white paper. This consultation period, as well as coinciding with Christmas, occurred during exceptional circumstances when COVID 19 was at a peak and people were preoccupied with the pandemic, their safety and in fact were being instructed to 'stay at home' by the Government as supported by Enfield council.

There are already four betting shops on our small high street; (two Ladbrokes, Paddy Power, and Betfred). This is more than enough! With unemployment and youth disengagement at the highest level it has been for years, it is irresponsible for Enfield Council to give its approval to a 24-hour gambling centre. This is likely to profit at the expense of those in society who least can afford it, whilst increasing the likelihood of antisocial behaviour and problem gambling. Moreover, with primary schools only a few minutes walk away from the site, this decision by the planning department is deeply disappointing.

As part of the 'New Local Plan,' Enfield was tasked with supporting the community in regenerating our shopping area with innovative and creative ideas, not allow our once thriving High Street to deteriorate into a string of betting shops and amusement arcades. This kind of establishment signals the decline of an area, not regeneration. It will be detrimental to the plans to re-imagine Palmers Green and make it an attractive place to shop and spend leisure time.

I would appreciate your immediate assistance and advice in how best to challenge the licence decision for this

unwanted development. As far as we can see there has not been due process; the development has not been advertised in line with LBE's own policy or allowed for the extenuating circumstances we have all been living under. We plead with you to find a way to begin the consultation process again so that residents are given a fair chance to respond.

Yours faithfully

From:
To: Cllr Nesil Caliskan
Subject: Merkur Development Green Lanes
Date: 20 February 2021 12:49:21

Dear Cllr Caliskan

I am writing to voice my opposition to the above development in Green Lanes.

I think that this is irresponsible business to be allowing on our high street in times when people are very financially vulnerable. There are so many groups and traders working hard to make our high street a better place for local people to shop and spend their leisure time in. This business will actively deter people coming to the high street which without doubt is in need of regeneration.

I and my neighbours were unaware of the licencing / change of usage application made. In times of Covid this has perhaps fallen under the radar but I strongly urge you to reconsider.

Kind regards

From:
To: cllr.nesil.caliskan@enfield.gov.uk <cllr.nesil.caliskan@enfield.gov.uk>
Subject: Merkur Slots- controversial casino application- 292 Green Lanes
Date: 25 February 2021 15:22:45
Attachments: premises license.jpg

Dear Sir/ Madam,

I am writing to you in relation to the baffling decision 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.

I am not a legal expert, but my understanding is that a *Notice of application for a premises licence* needs to fulfil three criteria- Be at least A4 in size, pale blue in colour and printed in a font of at least, size 16. I believe that the screen-shot attached (which I took on 22/02/21) doesn't meet two of these criteria. It doesn't appear to be pale blue and equally I don't think the box, which the text is housed within, is of A4 size.

You may be aware of a petition that has been launched regarding this issue. After only 6 days, **3100** people have signed this petition through Change.org. **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; <https://www.change.org/p/to-the-leader-of-enfield-borough-council-no-to-merkur-slots-in-palmers-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.

Kind Regards

From:
To: Cllr Nesil Caliskan
Subject: Merkur Slots PG Green Lanes
Date: 19 February 2021 21:37:52

Hello Cllr Caliskan,

I hope you are well.

I am writing to express my dismay at hearing about the permission granted by Enfield Council for a gaming premises in the old Store 21 unit on PG Green Lanes.

I have been so encouraged lately by the good work of PG Action Team and the way in which the Council have supported their work to raise the profile of the area. I find it impossible to reconcile this activity with granting permission for more neon signs and an unwelcome business of this nature.

I have a small family and don't want to have walk my children past this kind of business on the way to shops and to the post office. It's wholly depressing and isn't part of the environment we should be creating for ourselves or our children. If the council are supportive of these kind of businesses then perhaps you could suggest more appropriate premises in an out of town / non-residential area.

At best, we'll be dealing with more neon signs and a business which won't be relevant to 99% of the population of PG and at worse, we'll be increasing vulnerabilities locally (especially in light of the prevailing situation) and inviting associated issues, like day-time drinking, to our high street.

You won't need me to point out that we already have betting shops. I have never heard anyone one in our local community asking for more venues in which to gamble.

I think it is a huge mistake for the Council to allow more gambling locally in an aim to avoid empty units. For most of the community this unit may as well be empty as it doesn't enhance our lives in any way, shape or form.

If you listen to local residents, I am sure you will hear this view from many others.

I would please ask that you take action to review the permission granted to this business, and that you also set out a clear strategy for the future of Palmers Green High Street, so this kind of thing can't happen again.

Thanks in advance.
Best wishes,

From:
Sent: 01 March 2021 09:36
To: robert.buckland.mp@parliament.uk; Cllr Nesil Caliskan <Cllr.Nesil.Caliskan@Enfield.gov.uk>;
Subject: gambling

Dear Mr. Buckland,

This is to ask you to think seriously about the laws on gambling and do your best to change the current laws. As i am sure you know, it is the poorest people in this country who have suffered most from the proliferation of gambling premises in the last few years.

I live in Enfield, where there is currently the danger of another betting shop being opened in Palmers Green. Our council is doing its best to oppose this but they have liimited powers. In my view the legalisation of many betting shops some years ago did much to hasten the increasing gap between rich and poor in this country.

Yours sincerely,

From:

Sent: 28 February 2021 13: 23

To: Cllr Nesil Caliskan <Cllr.Nesil.Caliskan@Enfield.gov.uk>

Subject: Proposal to open a branch of Merkur Slots in Palmers Green

Dear Nesil,

I am writing to ask a question about the proposal to open a branch of Merkur Slots in Palmers Green.

There has been a lot of debate about the subject on Next Door social media and it was stated that the council are 'powerless' to do anything about the proposal.

[Redacted - personal data]

Personally I don't think places like this add anything beneficial to an area. There are 179 branches of the company in the UK and they already have sites in Tottenham and Edmonton so you can see where they are going with this expansion.

If anything they make areas worse and are well known for being centres where drug dealing and anti-social behaviour take place plus they often keep very long opening hours (or will do when lockdown is lifted) In fact they are usually open much longer hours than betting shops.

Anyway, I hope you will intervene and prevent this proposal going ahead.

Kind regards,

From:
Sent: 01 March 2021 10:28
To: Cllr Nesil Caliskan <Cllr.Nesil.Caliskan@Enfield.gov.uk>
Subject: RE: Proposed Gaming Centre on Palmers Green High Street

Dear Cllr Nesil Caliskan,

I recently received your letter regarding this proposed gaming centre. Like you, I strongly oppose this and I think that these establishments are amoral and a blight on the community. I read your letter, and am shocked and appalled at the ease of which businesses like these are allowed to subvert any challenges to their proposals.

I am also disappointed to learn that it looks very much like this will go ahead. That said, I would like to write to the Rt Hon Robert Buckland MP as outlined in your letter, but I was wondering if you would be so kind as to provide a template or similar, so that I know I am writing it correctly and not missing any points.

I also noted that within the objectives the licenses must meet is: *'preventing gambling from being a source of crime or disorder, being associated with crime or disorder to being used to support crime*'. I feel like this is a particularly mild caveat as it could be argued this cannot be proven until the premises is in operation? And I personally believe that it is inevitable; gambling shops are an easy way for criminals to 'launder' money - a quick google search of this brings this news article from 2013 :
https://www.theguardian.com/uk-news/2013/nov/08/gambling-machines-drug-money-laundering-bookies

Further to this, I personally witnessed drug deals quite brazenly taking place at/outside the Paddy Power in Turnpike Lane whilst waiting for the bus there, around 2018 or 19. I can only assume that the choice of location was so that the money could be immediately 'cleaned' (I reported this to the police at the time).

I appreciate your concern for the community, and would like to do what I can to help challenge this awful proposal.

From:
Date: Fri, 5 Mar 2021 at 23:36
Subject: Gambling and Community in 2021
To: Robert.buckland.mp@parliament.uk <Robert.buckland.mp@parliament.uk>
Cc: cllr.nesil.caliskan@enfield.gov <cllr.nesil.caliskan@enfield.gov>

Dear Rt Hon Robert Buckland MP,

Thank you for taking the time to read my email.

I am writing as a resident of Winchmore Hill, London Borough of Enfileld. I am 17 years old and am passionate about the place I have grown up in and how best to ensure that key places such as Palmers Green High Street remain spaces to foster growth and development. Palmers Green High Street has so much potential: community and family areas such as the library, sewing shops and charity shops already provide opportunity for positivity. The downside of the High Street is that in recent years many gambling shops have been springing up in vacant spaces, which is at odds with the potential of the street to be a positive community space. There are already at least three gambling shops (two Ladbrokes and a Paddy Power), which actively encourage individuals to risk gambling away money and getting into debt. I I feel that in these times of economic insecurity and desperation for many, it is a duty of those in power to ensure that opportunities for gambling are reduced as much as possible. In the short and long term less gambling means less families broken apart and less spirals of deprivation.

However, due to the current law 'Gambling Act 2005', councils do not have effective powers to limit the number of gambling premises in an area and in fact local authorities are required to 'aim to permit' gambling premises licenses. This poses a particular problem at the moment as 'Merkur Slots Gaming Centre' has been proposed to open on Palmers Green High street soon. Enfield Council have been trying to prevent its opening, but are struggling in the face of this Law.
I understand that there must be practical difficulties and inconveniences to changing this law from 2005, but I really do believe that a focus on this law could result in a tangible difference to many people's lives. If the law was altered, less families would be broken apart and high streets could become all the more places for community growth, not destruction.
Thank you for taking the time to read my words and for your consideration.
I look forward to hearing from you,