



23 April 2021

Dear Ms Green

Copied to Grange Ward Councillors, Mark Rudling (EBTA) and Barry Snelgrove (Chalkwell Park Residents Association)

I understand that a notice advertising the application by Merkur Slots for a gambling licence for the property at 1-2 St Onge Parade, EN1 1YU, was posted at the site during Lockdown and across the Christmas period.

Given that this was during Lockdown and Christmas, it is hardly surprising that no members of the Enfield Town Residents Association, nor the Chalkwell Park Residents Association (Chair copied in), all of whom live close to this site, saw the notice.

We were therefore unaware of this application until Mr Mark Rudling of the Enfield Town Business Association brought it to our attention last week.

I had intended to write to state our strong objections to this application, but have now been made aware that LBE has rejected Mr Rudling's letter of objection on the basis that it was received after the closing date for receipt of objections; and furthermore that you have already approved a licence for the site.

However, this week it has been reported that the Council has now agreed to review its decision to grant Merkur Slots approval for its parallel application for a site in Palmers Green.

I am therefore writing to you to:

- a) lodge a complaint regarding the lack of publicity for the Merkur Slots application for the St Onge Parade site and the assessment process; and
- b) to ask that you institute a review of the decision regarding this site in parallel with the review of the decision regarding the Palmers Green application as a matter of some urgency.

The grounds for our complaint are as follows:

1. I note that the time allowed for submission of objections to a planning application for residential flats at 43-45 Baker Street lodged at around the same time last year was extended in recognition

of the very short length of time this gave people to respond given that Christmas is such a busy time of year. That extension was given for an application that arguably has far fewer negative impacts than the introduction of a gambling establishment, the type of establishment for which there is well-documented evidence for their negative associations with increases in anti-social behaviour, debts, alcohol and drugs. Furthermore, that application had been properly advertised and notified to councillors on the Planning Committee, so that they could ensure that residents were informed and able to respond.

2. None of the above applies to the licensing application by Merkur Slots. You say that the company complied fully with their obligations regarding advertising their application in posting the notice at the site. Yet you ignore the fact that most people were under instructions to minimise excursions outside their homes at the time. You cannot fail to have known that under these circumstances there was very little chance of local people having the opportunity to observe the notice.
3. Given the circumstances, there was surely a duty upon LBE officers to ensure that all other routes to alert residents to the matter had been taken. At the very least, local Ward Councillors should have been notified and able to pass on the information to residents. Yet it appears this did not happen. Our councillors, in whose ward this property is located, do not recall having been informed.
4. Had we received notification then I can assure you that you would have received the strongest possible objection from our organisations, primarily under item a) of the Gambling Act 2005, namely, the potential for gambling at this location being a source of crime or disorder, being associated with existing crime or disorder issues and/or being used to support crime. For your information, our objections under this point would have been for the following reasons:
 - following a spate of robberies from persons, primarily but not restricted to young people, this area is already subject to community patrols;
 - The Town already suffers from anti-social behaviour, shoplifting, begging and vagrancy, with all of these being regular subjects of complaint at Grange Ward Forums. It is a matter of some concern therefore that as our local Police struggle to contain existing crime, this company plans to open an establishment that will only serve to drive crime rates up even further. This is not mere conjecture or supposition: an investigation by the Universities of Lancaster and Glasgow found that 7.3 per cent of male prisoners surveyed considered that their current offence was linked to gambling; and 11 per cent of men linked gambling to past offending, as did 12 per cent of female gamblers.
 - thefts from vehicles is another frequently-reported crime, and given that those addicted to gambling are likely to be in search of sources of funds, can be expected to increase;
 - Such establishments attract large numbers of young males. The location concerned is situated on a particularly narrow section of the pavement leading close to the pedestrian crossing for the station. It is to be expected that customers and staff of the arcade will gather outside the venue smoking, thus causing congestion problems.
 - While this is likely to constitute a general nuisance, for lone females walking home from the station in the late evening or at night this is likely to increase their feelings of vulnerability, as they have to pass crowds of young men on a particularly narrow section of pavement.

Similar considerations apply to schoolchildren and those in wheelchairs making their way to and from the station.

- It should be noted that it was deemed necessary to artificially widen this section of the pavement as an aid to social distancing in the early stages of the pandemic. If it was judged to be 'too narrow' at that point then it is difficult to see how it can become sufficiently wide to accommodate loiterers as well as legitimate pedestrians, lone females and wheelchair users a year later. It is far from clear that an appropriately rigorous accessibility audit has been carried out prior to granting the application.
- Furthermore, for visitors entering the area from the station, to be greeted by a gambling arcade is far from the image that both businesses and leadership of Enfield Council are currently attempting to portray for our flagship town centre. Your officers must surely be aware that Enfield Council is currently attempting to improve the image of Enfield Town and re-establish it as a safe, attractive and welcoming shopping destination for the community.
- The introduction of a gambling establishment is hardly likely to support such a perception, and regrettably is more likely to attract both vulnerable and criminal sections of society into Enfield Town. Such venues are known to encourage the development of gambling addiction, sadly amongst those least able to afford to lose money. The types of clientele such a venue will attract are, far from improving the area, more likely to increase problems for other businesses in the area, especially those trying to improve the evening economy.

Under point (c) of the Gambling Act we would have made the following further objection:

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

Aside from these specific points we note, too, that in 2018 the Local Government Association published a report pointing to the public health issues related to gambling and encouraging council officers to support the revision of borough statements of policy to manage gambling within their localities. The document points to the many public health problems created by or associated with gambling and exhorted councils to identify their areas of high risk, which this location undoubtedly is.

It is therefore not possible to believe that Council officers were unaware of the issues surrounding this application. If they are unaware of these serious matters, then they should not be employed in the Licensing team.

The application appears to have been rushed through with unseemly haste. It is extremely difficult to understand why officers did not themselves raise the very issues that we have raised above. It is unconscionable that officers were not aware of the current issues regarding local crime, muggings and theft, alongside the recognition that criminal elements travel to Enfield Town via Enfield Town train station, a factor that has in part contributed to the need for local patrols to protect our young people. This venue will make the town centre an even more attractive destination for these criminal elements.

The most worry aspect of this whole matter therefore is that it gives the appearance that LBE officers were keen to enable the developers to have this application approved unopposed, given the failure to acknowledge and respond to the limitations placed on people's travel (and hence likelihood of viewing the notice) and to themselves raise any of the very many very real and obvious reasons that would have been legitimate grounds for rejecting this application.

We note that in the last few days it has been announced that LBE will be undertaking a review of the decision regarding the Merkur Slots application for the site in Palmers Green. We commend you for that action.

For all of the reasons stated above, and in line with residents' objections to the similar application in Palmers Green we believe that the application for Enfield Town must now be reviewed in parallel with that for Palmers Green and, hopefully, rejected

Yours sincerely

Dr Linda Miller

For and on behalf of the Committee of Enfield Town Residents Association