

Q.1

The Ladder Community Safety Partnership (LCSP) is a long-standing (20 years) local community organisation in the London Borough of Haringey. We have taken an active interest in the proliferation and clustering of betting shops in our High Street (Green Lanes N4/N8) and in the most deprived areas of the country. A key element of our concern has always been the presence of FOBTs in each outlet, offering high stakes gambling (£100 every 20 secs, ie £300/minute). We have also noted the vulnerable clientele in our local betting shops, especially young men with a poor command of English, who are known to be more likely to be sucked into gambling addiction.

Our members are pleased to see that the £100 stake has now been ruled out, but we are still very concerned that the government has not already chosen to adopt a £2 maximum, as recommended by the majority of MPs and 93 local authorities throughout the country. By failing to offer a £10 option, there is therefore a big jump in the government's proposals to the £20 stake, which is still far too high. It is worryingly indicative that shares in the betting industry bounced upwards after this announcement in the consultation. This clearly suggests a degree of confidence that the government will not pursue the £2 option, but rather settle for £20, as it is already the average machine stake and would therefore appease the industry. We obviously hope that decisions will not be made on this basis.

The LCSP strongly supports a maximum £2 stake not only for the above reasons, but also because:

- specific areas of particular boroughs are targeted by bookmakers (eg in the case of Haringey, Tottenham High Rd, West Green Rd, Green Lanes, but not the more affluent Muswell Hill, Highgate or Crouch End)
- for the same reason, there are only 56 outlets in Wandsworth, but 81 in Newham: this is not an arbitrary outcome, but clear evidence of a pattern
- FOBTs bring in an average profit of £50,000 per machine each year [ref Guardian p36, 4.11.17], constituting a massive economic loss to the local economy and untold harm both to the families and the local communities from which this money is being taken
- given that there are approx 34,000 [ref Telegraph, 1.11.17] such machines in the country, simple mathematics indicates the staggering total cost both to our local communities, and the nation as a whole, especially in deprived areas (which is why local authorities are so concerned to push for the £2 maximum stake)
- attacks on FOBTs, plate glass windows and doors are frequent, while staff sit behind protective barriers rather than mingle with frustrated and potentially (or

actually) aggressive punters. Such criminal damage is hugely under-reported because bookmakers do not want to reveal the full extent of a problem which could threaten an operating licence.

- high-stake gambling on FOBTs has little to offer society as a whole except broken relationships, fractured communities, gambling addiction and crime. The Gambling Commission earlier this year found that 43% of FOBT users are problem or at risk punters. All of this could be remedied by limiting the maximum stake to £2, thereby turning FOBTs into enjoyable and relatively harmless pastimes rather than the addictive and dangerous habits they would remain if a £20 maximum stake were adopted.

- in conclusion, the LCSP strongly urges the government to adopt the £2 stake option, with all the overwhelmingly positive outcomes which will flow from that decision.

Q.15

We do not agree with the government's assessment of powers available to Local Authorities. In particular, we support the numerous LAs which responded to the previous consultation by saying that the introduction of cumulative impact assessments (CIAs) would be a very helpful development.

Using existing tools (such as Licensing Policy Statements and the Local Plan) might seem a reasonable suggestion. However, Haringey's Local Plan proposals (now modified and adopted) were watered down in many areas by the Planning Inspectorate, while the Gambling Act does not allow the prevention of public nuisance etc as a criterion to prevent cumulative impact.

We do not understand why the government is opposed to giving LAs more options to deal with the issue. Surely it is better to offer a variety of approaches, rather than insist that existing options are adequate. Clearly they are not, otherwise we would not have the degree of clustering that now obtains in so many of our High Streets, including the one that forms part of the local community which the LCSP represents.