

Dear sir or madam

Please find below our representation in relation to the licence application for an Adult Gaming Centre at 70 Deptford High Street. This is being filed on behalf of Deptford Society members who are resident on the high street and adjoining streets, and those who own and operate businesses on Deptford High Street.

We attach a petition which has been signed by 36 business owners who operate on Deptford High Street, close to the premises, and who have also asked us to represent them in bringing this objection.

We object to the application on the following grounds:

1. Preventing gambling being a source of crime or disorder.

The proposed premises is in New Cross ward - this ward already suffers levels of anti-social behaviour that are almost twice the level recorded overall in Lewisham borough, and more than twice the national average. The applicant's risk assessment does not mention the hyperlocal issue of street drinking, nor does it address the existing levels of anti-social behaviour in the area.

<https://www.observatory.lewisham.gov.uk/crime-and-community-safety/report/view/30a1abb2a53f42fa87dea33c0c73c342/E05000449>

Recorded crimes of every type except shoplifting are **consistently** much higher in New Cross than the average across the borough, and it has the third highest level of crime of all the borough's wards.

Deptford High Street has existing high levels of anti-social behaviour and ongoing problems with street drinking. Anti-social behaviour and street drinking is such an issue for residents and traders that officers from the local Safer Neighbourhoods Team have told us they conduct a monthly walkabout on Deptford High Street with licensing officers from Lewisham Council to try and address the problem.

Street drinkers regularly congregate outside existing gambling premises (Paddy Power, Ladbrokes and Jennings in particular) and this was also a problem outside 70 Deptford High Street when it was operating as a betting shop. The disorder and anti-social behaviour that this generates has a direct impact on nearby shops and traders are of the opinion that other gambling establishments will exacerbate this problem.

Deptford High Street, with its regular market, has a reputation as a family-friendly shopping destination and local business owners believe that the presence of an adult gaming centre will undermine this reputation and be a backward step for local businesses. The Deptford Society supports this view and considers that the presence of such an establishment will neither improve nor enhance the Conservation Area that we seek to protect.

Please see attached the copy of the petition signed by 36 high street businesses against this application.

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

The premises is based in New Cross ward, very close to the border with Evelyn ward. Both wards have extremely high levels of deprivation and child poverty.

In Evelyn ward, **30% of children live in low income families**, and in New Cross this figure is 28%; this is double the figure reported across Lewisham borough and the national average, both of which are around 15%. In both of these wards, 22% of children under 16 live in families with absolute low income, compared to 15.5% across the borough. A business that exists solely to encourage gambling, and that has the potential to operate on a 24/7 basis, would not be a welcome addition to an environment in which poverty is already highly visible.

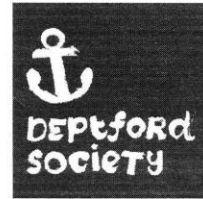
The proposed premises is in close proximity to two primary schools and a secondary school; another secondary school and a college are within a short walk of the site. During lunchtime and after school, large numbers of unsupervised pupils from both secondary schools come to the High Street for refreshment and to socialise. Regarding the protection of children and young persons, the Gambling Commission states in their Adult Gaming Centre guidance for licensing authorities:

21.3 Licensing authorities will wish to have particular regard to the location of and entry to AGCs to minimise the opportunities for under-18s to gain access. This may be of particular importance in areas where young people may be unsupervised for example, where an AGC is in a complex, such as a shopping centre or airport. Licensing authorities should consider whether their statement of policy can be used to reflect such locally based considerations.

The proposed amusement arcade is at a central location on the high street and the young people of the area will pass it at least twice a day, on their way to and from schools and nurseries. The presence of such a business in the middle of a popular shopping street will lead to gambling being normalised in the eyes of these children and young adults.

Deptford is also a focus for organisations that provide support services to vulnerable adults; at least seven different organisations and charities are based on Deptford High Street or adjoining streets. The help that these places provide means that Deptford is either home to or each day brings a population of adults who are already experiencing severe difficulties in managing their affairs. Granting this licence would do a considerable disservice to the efforts of these organisations to rehabilitate their clients.

The social deprivation detailed above is, in itself a form of vulnerability with debt being a well known result of poverty. The fact that the proposed premises is on a road with no less than three pawnbroker shops and a long established money lenders providing short term high interest cash loans, proves that this is an area with above average susceptibility to negative gambling and will put those already in difficult circumstances at risk of increased and uncontrolled debt. The developing economic effects of Covid 19 are likely to make these issues even more acutely felt in the local area.



Application for an Adult Gaming Centre licence at 70 Deptford High Street

We the undersigned shop-keepers and traders of Deptford High Street object strongly to the above licensing application on the following grounds;

Potential to encourage anti-social behaviour

No 70 is a large, central unit on the southern stretch of Deptford High Street. Families and children will have to pass by at all times of the day when the proposed amusement arcade is open.

Deptford has a large number of street drinkers and when this premises was a betting shop, groups of street drinkers regularly congregated outside the building. Since the betting shop closed, this activity has reduced. However we believe that granting a licence for an AGC will see this unwanted situation return, or maybe even worsen.

Loss of uses sympathetic to the High Street

The premises was formerly used as a betting shop for more than a decade, during a time when gaming laws were relaxed and the number of betting shops on the high street rose rapidly. Subsequent reviews of that policy indicated that it had a detrimental impact on poorer communities such as those in Deptford.

Prior to 2004, the premises was a community hub cafe and prior to that a shop - these uses contributed to the character of the High Street in a way that an amusement arcade will not.

In summary

Deptford High Street currently has four betting shops, two pawnbrokers and one 'payday loan' shop. We consider that granting a licence for another gambling premises will lead to an unacceptable concentration of such businesses on the high street, and will undermine Deptford's established reputation as a popular family shopping destination.

We strongly oppose the licensing of a gambling premises at No 70 as we would consider it a backward step for the reasons set out above.

| Name | Address |
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