



Alcohol and Entertainment Licensing Sub-Committee

Wednesday 8 July 2020 at 10.00 am

This will be held as an online virtual meeting.

Details on how to access the link in order to join and view proceedings will be made available online via: <https://www.brent.gov.uk/your-council/democracy-in-brent/local-democracy/live-streaming/>

Membership:

Members

Councillors:

Ahmed (Chair)
Long (Vice-Chair)
Kennelly

Substitute Members

Councillors:

Chohan, Hector, McLeish, W Mitchell Murray, RS Patel,
Maurice, Shahzad

For further information contact: Devbai Bhanji, Governance Assistant
Tel: 020 8937 6841; Email: devbai.bhanji@brent.gov.uk

For electronic copies of minutes, reports and agendas, and to be alerted when the minutes of this meeting have been published visit:

www.brent.gov.uk/committees

The press and public are welcome *to join and view proceedings which will be made available online via:*

<https://www.brent.gov.uk/your-council/democracy-in-brent/local-democracy/live-streaming/>

Notes for Members - Declarations of Interest:

If a Member is aware they have a Disclosable Pecuniary Interest* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

If a Member is aware they have a Personal Interest** in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also significant enough to affect your judgement of a public interest and either it affects a financial position or relates to a regulatory matter then after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

***Disclosable Pecuniary Interests:**

- (a) **Employment, etc.** - Any employment, office, trade, profession or vocation carried on for profit gain.
- (b) **Sponsorship** - Any payment or other financial benefit in respect of expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) **Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) **Land** - Any beneficial interest in land which is within the council's area.
- (e) **Licences** - Any licence to occupy land in the council's area for a month or longer.
- (f) **Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) **Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

****Personal Interests:**

The business relates to or affects:

- (a) Anybody of which you are a member or in a position of general control or management, and:
 - To which you are appointed by the council;
 - which exercises functions of a public nature;
 - which is directed is to charitable purposes;
 - whose principal purposes include the influence of public opinion or policy (including a political party or trade union).
- (b) The interests of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

A decision in relation to that business might reasonably be regarded as affecting the well-being or financial position of:

- You yourself;
- a member of your family or your friend or any person with whom you have a close association or any person or body who is the subject of a registrable personal interest.

Agenda

Introductions, if appropriate.

Item	Page
1 Apologies for absence and clarification of alternate members	
2 Declarations of Interests	
Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.	
3 Application for New Premises Licence by Lidl Great Britain Ltd for the premises known as Lidl, Minavil House, Ealing Road, Alperton, HA0 4EL, pursuant to the provisions of the Licensing Act 2003	1 - 48
4 Application for an Adult Gaming Centre by Future Leisure Ltd for the premises known as 141 Kilburn High Road, NW6 7HT, pursuant to the provisions of the Licensing Act 2003	49 - 188

Date of the next meeting: Date Not Specified



Please remember to **SWITCH OFF** your mobile phone during the meeting.

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LICENSING ACT 2003

Application for New Premises Licence

1. The Application

Name of Applicant:	Lidl Great Britain Ltd
Name & Address of Premises:	Lidl, Minavil House, Ealing Road, Alperton, HA0 4EL
Applicants Agent:	

The application is for a new premises licence:

- 1 For the sale and supply of alcohol and to remain open from 07:00hrs to 23:00hrs Monday to Sunday.

2. Background

The review of the Statement of Licensing Policy has introduced Cumulative Impact Zones for all new or variation applications for 'Off' licences in the borough.

Cumulative Impact Zones are a tool outlined in the Licensing Act 2003 to address alcohol related anti-social behaviour where authorising of further licences in a specific area may undermine the promotion of the licensing objectives.

This application falls within a Cumulative Impact Zone.

3. Promotion of the Licensing Objectives

See page 17-18 of the application form.

4. Relevant Representations

Representations have been received from the Police and Licensing Officers.

5. Interested Parties

None

6. Policy Considerations

Policy 1 – Process for Applications

Conditions on the licence, additional to those voluntarily sought/agreed by the applicant, may be considered. Conditions will focus on matters which are within the control of individual licensee and which relate to the premises or areas being used for licensable activities, the potential impact of the resulting activities in the vicinity. If situations arise where the licensing objectives may be undermined but cannot be dealt with by the use of appropriate conditions the Licensing Authority will consider whether it is appropriate for a licence to be granted or continue to operate.

7. Determination of the Application

Members can take the following steps when determining a new premises licence application:

- grant the licence;
- exclude from the scope of the licence any of the licensable activities to which the application relates;
- refuse to specify a person in the licence as the premises supervisor;
- reject the application

8. Associated Papers

- A. Copy of Application Form & Plan
- B. Police Representation
- C. Licensing Representation
- D. OS Map

Application for a premises licence to be granted under the Licensing Act 2003

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

Before completing this form please read the guidance notes at the end of the form. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.

You may wish to keep a copy of the completed form for your records.

I/We Lidl Great Britain Limited

(Insert name(s) of applicant)

apply for a premises licence under section 17 of the Licensing Act 2003 for the premises described in Part 1 below (the premises) and I/we are making this application to you as the relevant licensing authority in accordance with section 12 of the Licensing Act 2003

Part 1 – Premises details

Postal address of premises or, if none, ordnance survey map reference or description Minavil House Ealing Road			
Post town	Alperton	Postcode	HA0 4EL
Telephone number at premises (if any)			
Non-domestic rateable value of premises		£Not Yet Valued	

Part 2 - Applicant details

Please state whether you are applying for a premises licence as **Please tick as appropriate**

- | | | |
|--|-------------------------------------|-----------------------------|
| a) an individual or individuals * | <input type="checkbox"/> | please complete section (A) |
| b) a person other than an individual * | | |
| i as a limited company/limited liability partnership | <input checked="" type="checkbox"/> | please complete section (B) |
| ii as a partnership (other than limited liability) | <input type="checkbox"/> | please complete section (B) |
| iii as an unincorporated association or | <input type="checkbox"/> | please complete section (B) |
| iv other (for example a statutory corporation) | <input type="checkbox"/> | please complete section (B) |
| c) a recognised club | <input type="checkbox"/> | please complete section (B) |
| d) a charity | <input type="checkbox"/> | please complete section (B) |

- e) the proprietor of an educational establishment ☐ please complete section (B)
- f) a health service body ☐ please complete section (B)
- g) a person who is registered under Part 2 of the Care Standards Act 2000 (c14) in respect of an independent hospital in Wales ☐ please complete section (B)
- ga) a person who is registered under Chapter 2 of Part 1 of the Health and Social Care Act 2008 (within the meaning of that Part) in an independent hospital in England ☐ please complete section (B)
- h) the chief officer of police of a police force in England and Wales ☐ please complete section (B)

* If you are applying as a person described in (a) or (b) please confirm (by ticking yes to one box below):

I am carrying on or proposing to carry on a business which involves the use of the premises for licensable activities; or ☒

I am making the application pursuant to a statutory function or ☐

a function discharged by virtue of Her Majesty's prerogative ☐

(A) INDIVIDUAL APPLICANTS (fill in as applicable)

Mr <input type="checkbox"/>	Mrs <input type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other Title (for example, Rev)	
Surname			First names		
Date of birth			I am 18 years old or over <input type="checkbox"/> Please tick yes		
Nationality					
Current residential address if different from premises address					
Post town				Postcode	
Daytime contact telephone number					
E-mail address (optional)					
Where applicable (if demonstrating a right to work via the Home Office online right to work checking service), the 9-digit 'share code' provided to the applicant by that service (please see note 15 for information)					

SECOND INDIVIDUAL APPLICANT (if applicable)

Mr <input type="checkbox"/>	Mrs <input type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other Title (for example, Rev)	
Surname			First names		
Date of birth			I am 18 years old or over <input type="checkbox"/> Please tick yes		
Nationality					
Where applicable (if demonstrating a right to work via the Home Office online right to work checking service), the 9-digit 'share code' provided to the applicant by that service: (please see note 15 for information)					
Current residential address if different from premises address					
Post town				Postcode	
Daytime contact telephone number					
E-mail address (optional)					

(B) OTHER APPLICANTS

Please provide name and registered address of applicant in full. Where appropriate please give any registered number. In the case of a partnership or other joint venture (other than a body corporate), please give the name and address of each party concerned.

Name Lidl Great Britain Limited
Address 19 Worple Road Wimbledon London SW19 4JS
Registered number (where applicable) 02816429
Description of applicant (for example, partnership, company, unincorporated association etc.) Limited Company

Telephone number (if any) 0117 428 0315
E-mail address (optional) licensing@lidl.co.uk

Part 3 Operating Schedule

When do you want the premises licence to start?

DD		MM		YYYY			
1	8	0	6	2	0	2	0

If you wish the licence to be valid only for a limited period, when do you want it to end?

DD		MM		YYYY			

Please give a general description of the premises (please read guidance note 1)
Supermarket

If 5,000 or more people are expected to attend the premises at any one time, please state the number expected to attend.

What licensable activities do you intend to carry on from the premises?

(please see sections 1 and 14 and Schedules 1 and 2 to the Licensing Act 2003)

Provision of regulated entertainment (please read guidance note 2)

Please tick all that apply

- a) plays (if ticking yes, fill in box A) ☐
- b) films (if ticking yes, fill in box B) ☐
- c) indoor sporting events (if ticking yes, fill in box C) ☐
- d) boxing or wrestling entertainment (if ticking yes, fill in box D) ☐
- e) live music (if ticking yes, fill in box E) ☐
- f) recorded music (if ticking yes, fill in box F) ☐
- g) performances of dance (if ticking yes, fill in box G) ☐
- h) anything of a similar description to that falling within (e), (f) or (g) (if ticking yes, fill in box H) ☐

Provision of late night refreshment (if ticking yes, fill in box I)

☐

Supply of alcohol (if ticking yes, fill in box J)

☒

In all cases complete boxes K, L and M

A

Plays Standard days and timings (please read guidance note 7)			<u>Will the performance of a play take place indoors or outdoors or both – please tick</u> (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	<u>Please give further details here</u> (please read guidance note 4)		
Mon					
Tue					
			<u>State any seasonal variations for performing plays</u> (please read guidance note 5)		
Wed					
Thur					
			<u>Non standard timings. Where you intend to use the premises for the performance of plays at different times to those listed in the column on the left, please list</u> (please read guidance note 6)		
Fri					
Sat					
Sun					

B

Films Standard days and timings (please read guidance note 7)			<u>Will the exhibition of films take place indoors or outdoors or both – please tick</u> (please read guidance note 3)		Indoors	<input type="checkbox"/>
					Outdoors	<input type="checkbox"/>
					Both	<input type="checkbox"/>
Day	Start	Finish	<u>Please give further details here</u> (please read guidance note 4)			
Mon						
Tue						
			<u>State any seasonal variations for the exhibition of films</u> (please read guidance note 5)			
Wed						
Thur						
			<u>Non standard timings. Where you intend to use the premises for the exhibition of films at different times to those listed in the column on the left, please list</u> (please read guidance note 6)			
Fri						
Sat						
Sun						

C

Indoor sporting events Standard days and timings (please read guidance note 7)			Please give further details (please read guidance note 4)
Day	Start	Finish	
Mon			
Tue			State any seasonal variations for indoor sporting events (please read guidance note 5)
Wed			
Thur			
Fri			Non standard timings. Where you intend to use the premises for indoor sporting events at different times to those listed in the column on the left, please list (please read guidance note 6)
Sat			
Sun			

D

Boxing or wrestling entertainments Standard days and timings (please read guidance note 7)			<u>Will the boxing or wrestling entertainment take place indoors or outdoors or both – please tick</u> (please read guidance note 3)		Indoors	<input type="checkbox"/>
					Outdoors	<input type="checkbox"/>
					Both	<input type="checkbox"/>
Day	Start	Finish	<u>Please give further details here</u> (please read guidance note 4)			
Mon						
Tue						
Wed			<u>State any seasonal variations for boxing or wrestling entertainment</u> (please read guidance note 5)			
Thur						
Fri						
Sat			<u>Non standard timings. Where you intend to use the premises for boxing or wrestling entertainment at different times to those listed in the column on the left, please list</u> (please read guidance note 6)			
Sun						

E

Live music Standard days and timings (please read guidance note 7)			Will the performance of live music take place indoors or outdoors or both – please tick (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	Please give further details here (please read guidance note 4)		
Mon					
Tue					
			State any seasonal variations for the performance of live music (please read guidance note 5)		
Wed					
Thur					
			Non standard timings. Where you intend to use the premises for the performance of live music at different times to those listed in the column on the left, please list (please read guidance note 6)		
Fri					
Sat					
Sun					

F

Recorded music Standard days and timings (please read guidance note 7)			<u>Will the playing of recorded music take place indoors or outdoors or both – please tick</u> (please read guidance note 3)		Indoors	<input type="checkbox"/>
					Outdoors	<input type="checkbox"/>
					Both	<input type="checkbox"/>
Day	Start	Finish	<u>Please give further details here</u> (please read guidance note 4)			
Mon						
Tue						
Wed			<u>State any seasonal variations for the playing of recorded music</u> (please read guidance note 5)			
Thur						
Fri			<u>Non standard timings. Where you intend to use the premises for the playing of recorded music at different times to those listed in the column on the left, please list</u> (please read guidance note 6)			
Sat						
Sun						

G

Performances of dance Standard days and timings (please read guidance note 7)			<u>Will the performance of dance take place indoors or outdoors or both – please tick</u> (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	<u>Please give further details here</u> (please read guidance note 4)		
Mon					
Tue					
Wed			<u>State any seasonal variations for the performance of dance</u> (please read guidance note 5)		
Thur					
Fri			<u>Non standard timings. Where you intend to use the premises for the performance of dance at different times to those listed in the column on the left, please list</u> (please read guidance note 6)		
Sat					
Sun					

H

Anything of a similar description to that falling within (e), (f) or (g) Standard days and timings (please read guidance note 7)			Please give a description of the type of entertainment you will be providing	
Day	Start	Finish	Will this entertainment take place indoors or outdoors or both – please tick (please read guidance note 3)	Indoors <input type="checkbox"/>
Mon				Outdoors <input type="checkbox"/>
				Both <input type="checkbox"/>
Tue			Please give further details here (please read guidance note 4)	
Wed				
Thur			State any seasonal variations for entertainment of a similar description to that falling within (e), (f) or (g) (please read guidance note 5)	
Fri				
Sat			Non standard timings. Where you intend to use the premises for the entertainment of a similar description to that falling within (e), (f) or (g) at different times to those listed in the column on the left, please list (please read guidance note 6)	
Sun				

I

Late night refreshment Standard days and timings (please read guidance note 7)			Will the provision of late night refreshment take place indoors or outdoors or both – please tick (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	<u>Please give further details here</u> (please read guidance note 4)		
Mon					
Tue					
			<u>State any seasonal variations for the provision of late night refreshment</u> (please read guidance note 5)		
Wed					
Thur					
			<u>Non standard timings. Where you intend to use the premises for the provision of late night refreshment at different times, to those listed in the column on the left, please list</u> (please read guidance note 6)		
Fri					
Sat					
Sun					

J

Supply of alcohol Standard days and timings (please read guidance note 7)			Will the supply of alcohol be for consumption – please tick (please read guidance note 8)	On the premises	<input type="checkbox"/>
				Off the premises	<input checked="" type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	State any seasonal variations for the supply of alcohol (please read guidance note 5)		
Mon	07:00	23:00			
Tue	07:00	23:00			
Wed	07:00	23:00			
Thur	07:00	23:00	Non standard timings. Where you intend to use the premises for the supply of alcohol at different times to those listed in the column on the left, please list (please read guidance note 6)		
Fri	07:00	23:00			
Sat	07:00	23:00			
Sun	07:00	23:00			

State the name and details of the individual whom you wish to specify on the licence as designated premises supervisor (Please see declaration about the entitlement to work in the checklist at the end of the form):

Name		
Date of birth		
Address		
Postcode		
Personal licence number (if known)		
Issuing licensing authority (if known)		

K

Please highlight any adult entertainment or services, activities, other entertainment or matters ancillary to the use of the premises that may give rise to concern in respect of children (please read guidance note 9).

L

Hours premises are open to the public Standard days and timings (please read guidance note 7)			State any seasonal variations (please read guidance note 5)
Day	Start	Finish	
Mon	07:00	23:00	
Tue	07:00	23:00	
Wed	07:00	23:00	
Thur	07:00	23:00	
Fri	07:00	23:00	Non standard timings. Where you intend the premises to be open to the public at different times from those listed in the column on the left, please list (please read guidance note 6)
Sat	07:00	23:00	
Sun	07:00	23:00	

M

Describe the steps you intend to take to promote the four licensing objectives:

a) General – all four licensing objectives (b, c, d and e) (please read guidance note 10)

- Staff will be trained regarding appropriate precautions to prevent the sale of alcohol to persons under the age of 18, the signs and symptoms of drunk persons and the refusal of sale due to intoxication. Staff will also be trained to recognise the signs of proxy purchases.
- Electronic records will be kept of such training for the member of staff who has received that training.
- All staff will receive refresher training every six months as a minimum and electronic records are to be kept of this refresher training.
- Confirmation of training can be made available to the Licensing Authority or Police within 7 days of a request.
- Any person found to be in breach of the Company alcohol policy is subject to disciplinary proceedings

b) The prevention of crime and disorder

- The operators of the premises will maintain a good relationship with the local police and other relevant authorities
- Lidl store management will be trained to view and download CCTV footage on receipt of an internal authorisation code. For urgent matters, at all times officers will be able to view CCTV footage to verify if a reported offence is covered and, whenever required, CCTV will be downloaded and made available to the officer as soon as reasonably practicable. For non-urgent matters, CCTV will be available to view and download at all times during normal office hours on receipt of an internal authorisation code or in any event within 48 hours.
- Recordings will be kept for a minimum of 28 days

c) Public safety

- Fire safety equipment is provided at the premises, and staff are trained on the use of this equipment
- Door supervisors/Security Guards will be employed at the premises on occasions as deemed necessary by the Premises Licence Holder following a risk assessment.

d) The prevention of public nuisance

- Alcohol will not be sold in an open container and the consumption of alcohol on the premises will not be permitted

e) The protection of children from harm

- There will be a Challenge 25 policy operating at the premises. Challenge 25 means that the holder of the premises licence shall ensure that every

individual, who visually appears to be under 25 years of age and is seeking to purchase or be supplied with alcohol at the premises or from the premises, shall produce identification proving that individual to be 18 years of age or older. Acceptable identification for the purposes of age verification will include a driving licence, passport or photographic identification bearing the "PASS" logo and the person's date of birth. If the person seeking alcohol is unable to produce acceptable means of identification, no sale or supply of alcohol will be made to or for that person.

- In the event that an employee suspects that a person attempting to purchase alcohol is under the age of 25, is a street drinker or is attempting a proxy purchase they will immediately call the duty manager. The duty manager will make appropriate enquiries and will determine whether the sale should be permitted.
- 'Challenge 25' posters shall be displayed in prominent positions at the premises.
- Other than where sold as part of a multipack or gift pack, spirits shall not be sold in bottles of less than 50cl.
- No super-strength beer, lager or cider of 6.5% ABV or above shall be sold at the premises other than speciality/ artisan beer, lager or cider.
- An automated till prompt will be set up so that the operator has to positively confirm that Challenge 25 has been complied with when the first item of alcohol has been scanned.

Checklist:

Please tick to indicate agreement

- I have made or enclosed payment of the fee. ☒
- I have enclosed the plan of the premises. ☒
- I have sent copies of this application and the plan to responsible authorities and others where applicable. ☒
- I have enclosed the consent form completed by the individual I wish to be designated premises supervisor, if applicable. ☒
- I understand that I must now advertise my application. ☒
- I understand that if I do not comply with the above requirements my application will be rejected. ☒
- [Applicable to all individual applicants, including those in a partnership which is not a limited liability partnership, but not companies or limited liability partnerships] I have included documents demonstrating my entitlement to work in the United Kingdom or my share code issued by the Home Office online right to work checking service (please read note 15). ☒

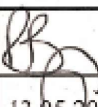
IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT.

IT IS AN OFFENCE UNDER SECTION 24B OF THE IMMIGRATION ACT 1971 FOR A PERSON TO WORK WHEN THEY KNOW, OR HAVE REASONABLE CAUSE TO

BELIEVE, THAT THEY ARE DISQUALIFIED FROM DOING SO BY REASON OF THEIR IMMIGRATION STATUS. THOSE WHO EMPLOY AN ADULT WITHOUT LEAVE OR WHO IS SUBJECT TO CONDITIONS AS TO EMPLOYMENT WILL BE LIABLE TO A CIVIL PENALTY UNDER SECTION 15 OF THE IMMIGRATION, ASYLUM AND NATIONALITY ACT 2006 AND PURSUANT TO SECTION 21 OF THE SAME ACT, WILL BE COMMITTING AN OFFENCE WHERE THEY DO SO IN THE KNOWLEDGE, OR WITH REASONABLE CAUSE TO BELIEVE, THAT THE EMPLOYEE IS DISQUALIFIED.

Part 4 – Signatures (please read guidance note 11)

Signature of applicant or applicant's solicitor or other duly authorised agent (see guidance note 12). **If signing on behalf of the applicant, please state in what capacity.**

Declaration	<ul style="list-style-type: none"> • [Applicable to individual applicants only, including those in a partnership which is not a limited liability partnership] I understand I am not entitled to be issued with a licence if I do not have the entitlement to live and work in the UK (or if I am subject to a condition preventing me from doing work relating to the carrying on of a licensable activity) and that my licence will become invalid if I cease to be entitled to live and work in the UK (please read guidance note 15). • The DPS named in this application form is entitled to work in the UK (and is not subject to conditions preventing him or her from doing work relating to a licensable activity) and I have seen a copy of his or her proof of entitlement to work, or have conducted an online right to work check using the Home Office online right to work checking service which confirmed their right to work (please see note 15)
Signature	
Date	13.05.2020
Capacity	Licensing Manager

For joint applications, signature of 2nd applicant or 2nd applicant's solicitor or other authorised agent (please read guidance note 13). **If signing on behalf of the applicant, please state in what capacity.**

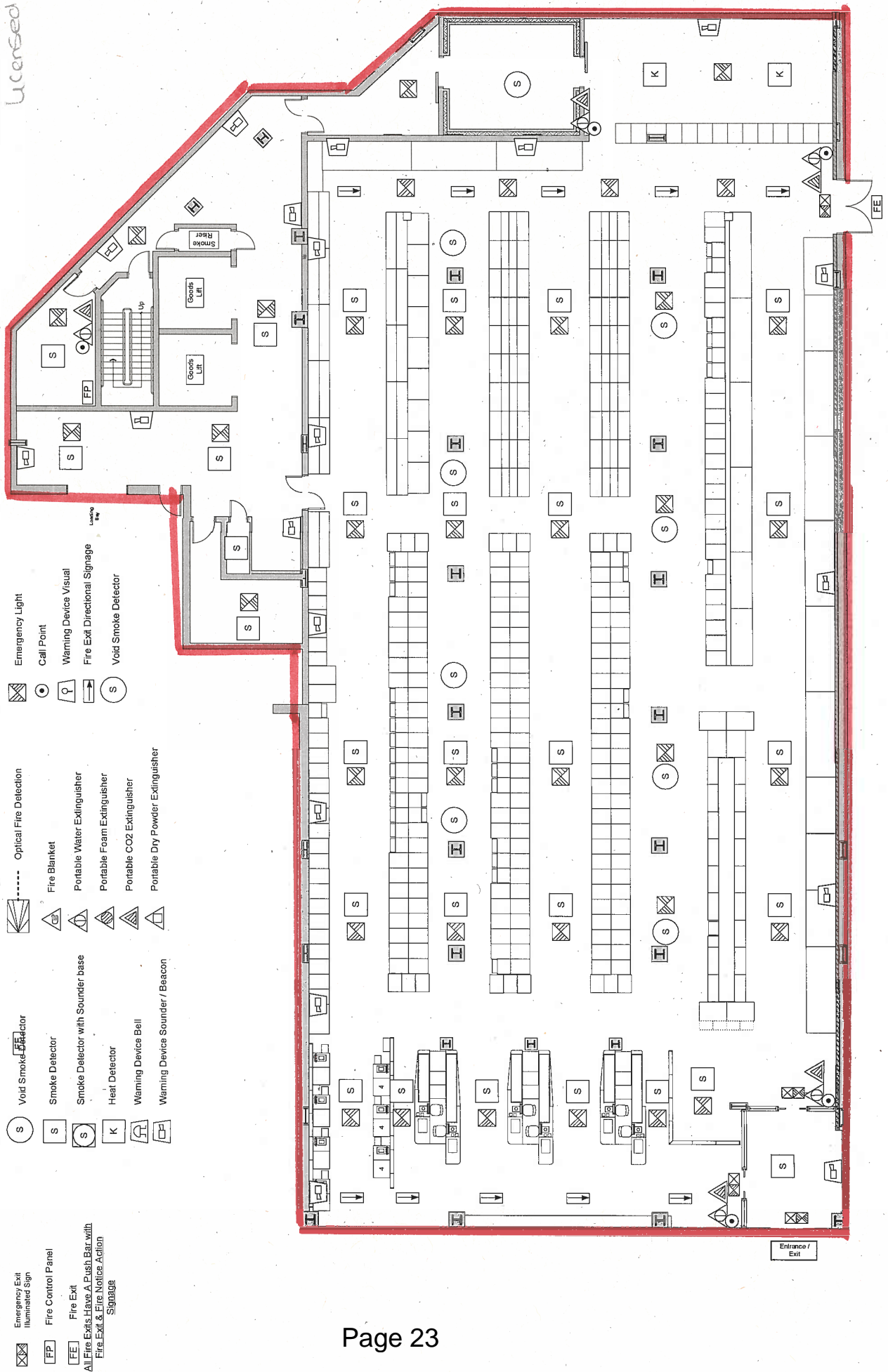
Signature	
Date	
Capacity	

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 14)			
Licensing Lidl Distribution Centre Palmer Avenue Central Park			
Post town	Severn Beach	Postcode	BS35 4DF
Telephone number (if any)	0117 428 0315		
If you would prefer us to correspond with you by e-mail, your e-mail address (optional) licensing@lidl.co.uk			

Notes for Guidance

1. Describe the premises, for example the type of premises, its general situation and layout and any other information which could be relevant to the licensing objectives. Where your application includes off-supplies of alcohol and you intend to provide a place for consumption of these off-supplies, you must include a description of where the place will be and its proximity to the premises.
2. In terms of specific regulated entertainments please note that:
 - Plays: no licence is required for performances between 08:00 and 23:00 on any day, provided that the audience does not exceed 500.
 - Films: no licence is required for 'not-for-profit' film exhibition held in community premises between 08.00 and 23.00 on any day provided that the audience does not exceed 500 and the organiser (a) gets consent to the screening from a person who is responsible for the premises; and (b) ensures that each such screening abides by age classification ratings.
 - Indoor sporting events: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000.
 - Boxing or Wrestling Entertainment: no licence is required for a contest, exhibition or display of Greco-Roman wrestling, or freestyle wrestling between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000. Combined fighting sports – defined as a contest, exhibition or display which combines boxing or wrestling with one or more martial arts – are licensable as a boxing or wrestling entertainment rather than an indoor sporting event.
 - Live music: no licence permission is required for:
 - a performance of unamplified live music between 08.00 and 23.00 on any day, on any premises.
 - a performance of amplified live music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
 - a performance of amplified live music between 08.00 and 23.00 on any day, in a workplace that is not licensed to sell alcohol on those premises, provided that the audience does not exceed 500.
 - a performance of amplified live music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
 - a performance of amplified live music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school or (iii) the health care provider for the hospital.

Licensed Area



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**METROPOLITAN
POLICE**

Working together for a safer London

TERRITORIAL POLICING

Brent Police Licensing Unit

*Brent Civic Centre
Engineers Way
Wembley
Middlesex
HA9 0FJ*

Your ref: 19059

Our ref: 2965NW/192/20

**Brent Borough Licensing
NW CU**

*South Harrow Police Station
74 Northolt Road
South Harrow
HA2 0DN*

Email:

Gary.L.R.Norton@met.police.uk

Web: www.met.police.uk

Date: 11/06/2020

Police representations to the premises licence application for 'Lidl, Minavil House, Ealing Road, Wembley, HA0 4EL'.

I certify that I have considered the application shown above and I wish to make representations that the likely effect of the grant of the application is detrimental to the Council's Licensing Objectives for the reasons indicated below.

Officer: PC Gary Norton 2965NW

An officer of the Metropolitan Police, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Licensing Act 2003.

An application has been made to apply for a premises licence under section 17 of the Licensing Act 2003.

The Police representations are primarily concerned with all four licensing objectives:

Prevention of Crime & Disorder; Prevention of Public Nuisance; Public Safety & The Protection of Children from Harm.

The premises site is within the Cumulative Impact Zone (CIZ), areas that have had repeated issues that undermine the licensing objectives, despite numerous conditions and action taken to reduce these problems. Therefore, as stated in Brent Councils guidance, "the presumption is that the application will be refused, unless the applicant can satisfactorily evidence that their application or variation will not negatively impact on the licensing objectives."

The application states a number of standard conditions in attempting to adhere to the licensing objectives, but not enough in my opinion to suggest this would mitigate the additional licensing issues in an area already saturated with premises offering alcohol sales.

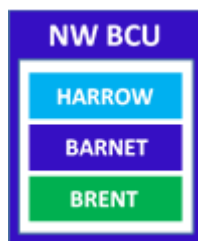
However, a business renowned for its low cost quality products selling alcohol at 0700hrs in the morning does nothing to reassure me that anything other than more licensing concerns will result.

Therefore, I oppose the premises license application.

Yours Sincerely,

PC Gary Norton 2965NW
Barnet/Brent/Harrow Licensing
NorthWest Partnership & Prevention

Gary.L.R.Norton@met.police.uk



The information contained in this e-mail and any attachments to it are intended solely for the person to whom it is addressed and may contain confidential and / or privileged information. The message may contain personal views, which are not the views of the Metropolitan Police Service, unless specifically stated. You should not copy, retain, forward or discuss its contents with anyone else, or take action based on it, if it is not addressed to you personally. If you have received this e-mail in error, please contact the sender immediately.

From: Gary.L.R.Norton@met.police.uk <Gary.L.R.Norton@met.police.uk>
Sent: 16 June 2020 14:48
To: licensing@lidl.co.uk
Cc: Business Licence <business.licence@brent.gov.uk>; Legister, Linda <Linda.Legister@brent.gov.uk>;
Susana, Figueiredo <Susana.Figueiredo@brent.gov.uk>
Subject: RE: Lidl Ealing Road Reps 12 06 2020

Dear Becky,

Looking at the premises licence application and weighing up the pros and cons, I obviously can see the positive economic effects of having Lidl in the Ealing Road area. However, given the saturation of premises that supply alcohol in the area, I cannot offer support to the premises licence application, or offer additional conditions that suitably address the existing licensing concerns.

The CIZ has been implemented for very serious reasons. The area in question was already part of a Public Space Protection Order (PSPO), but the ongoing issues revolving around alcohol supply in and around Brent called for tighter restrictions to be put in place.

Representations against the sale and supply of alcohol does not mean the store wouldn't be economically viable and I welcome them to the area, but I cannot offer conditions that I feel would mitigate the licensing concerns sufficiently to allow it.

Yours Sincerely,

PC Gary Norton 2965NW
Barnet/Brent/Harrow Licensing
NorthWest Partnership & Prevention

From: licensing@lidl.co.uk <licensing@lidl.co.uk>
Sent: 12 June 2020 17:29
To: Gary.L.R.Norton@met.police.uk
Cc: Business Licence <business.licence@brent.gov.uk>
Subject: RE: Lidl Ealing Road Reps 12 06 2020

Hi Gary

I can confirm that the conditions offered in this application were considered carefully and they are not what we would normally offer as standard. It was taken into consideration that the store was within a CIZ when submitting the application.

I contacted the police prior to submission and dealt with your colleague, Damian Smith. He advised that once the application was received the police would be able to liaise with us regarding any additional proposed conditions they felt necessary.

I have received no representations to the application to date.

Kind regards

Beckie Bough
Licensing Manager

From: Gary.L.R.Norton@met.police.uk <Gary.L.R.Norton@met.police.uk>
Sent: 12 June 2020 17:13
To: licensing@lidl.co.uk
Cc: Business Licence <business.licence@brent.gov.uk>
Subject: RE: Lidl Ealing Road Reps 12 06 2020

Dear Becky,

I appreciate your prompt reply. I think the major sticking point at the moment is what Lidl can do to go beyond the usual set of conditions given this area is now deemed a CIZ.

I would respectfully ask them to put back the starting time that sales of alcohol could take place, as the area has a pre-existing street drinking issue we are trying to eradicate; there are local schools in the area and the safety of the children to consider and I would suggest 09:00hrs.

I am not sure how the Council themselves will deal with the application as it stands, as this is within the CIZ, which suggests they would reject the application as well. Therefore, it may need to go to a hearing regardless of my representations.

Have you had any representations from the Council as yet?

Kind Regards,

PC Gary Norton 2965NW
Barnet/Brent/Harrow Licensing
NorthWest Partnership & Prevention

From: licensing@lidl.co.uk
Sent: 12 June 2020 15:15
To: Norton Gary L.R - NW-CU
Cc: business.licence@brent.gov.uk; Linda.Legister@brent.gov.uk; Susana.Figueiredo@brent.gov.uk
Subject: Re: Lidl Ealing Road Reps 12 06 2020

Sir

Thank you for your email.

Would you be happy to confirm any additional conditions that you would be looking for so that we could look to reach agreement without the need for a hearing? I note from your representation you only mention the hours.

I look forward to dealing with you further on this.

Kind regards

Beckie Bough
Licensing Manager

Lidl Great Britain Limited
Minavil House
Ealing Road
Alperton
HA0 4EL

16 June 2020

Dear Sir/Madam,

Licensing Representation to the Initial Application for the Premises Licence at Lidl, Minavil House, Ealing Road, Alperton, HA0 4EL

I certify that I have considered the application shown above and I wish to make a representation that the likely effect of the grant of the application is detrimental to the Licensing Objectives for the reasons indicated below.

An officer of the Licensing Authority, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Licensing Act 2003.

The application has been made for a new premises licence under section 17 of the Act.

The Licensing Authority representations are primarily concerned with the four licensing objectives;

- the prevention of crime and disorder;
- public safety;
- the prevention of public nuisance; and
- the protection of children from harm.

Cumulative Impact Zone (CIZ)

The Council's current Licensing Policy came into effect in January 2020. Crime and complaints assessments in 2015, did not identify any requirement for a CIZs. However, since 2016 there has been a significant and notable increase in alcohol related crime and anti-social behaviour which is having an adverse impact in some areas and neighbourhoods generating complaints from residents, councillors and the Police. This is undermining the licensing objectives and also has potential to undermine the vitality of Brent's town centres.

Wembley Central which includes Ealing Road has been identified as one of ten Cumulative Impact Zones (CIZs) in Brent, where the authorising of further licences may undermine the promotion of the licensing objectives.

The Statement of Licensing Policy states: -

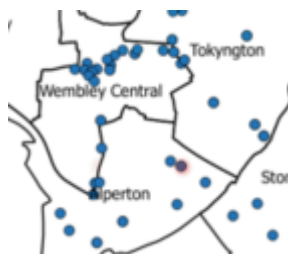
'Ealing Road

There are low level anti-social behaviour issues related to street drinking such as urination, defaecation etc. in this area. It is one of the areas where highest number of warning letters and fixed penalty notices have been issued to street drinkers. Further evidence has been provided by residents in the form of petition received during one of the licensing hearings. Therefore, it is proposed that a CIZ be introduced for off-licences on Ealing Road from the junction of High Road Wembley up to the junction of Bridgewater Road. The CIZ area includes Atlip Road, Mount Pleasant Road up to the junction of Orchard Close, Montrose crescent, Union Road and Coronet Parade'.

Data captured from various sources including alcohol related police and ambulance call outs has been mapped and shown sufficient evidence to implement CIZs in the specified area. In particular crime data and evidence shows a correlation between concentrations of off-licences and alcohol related anti-social behaviour, particularly that associated with street drinking.

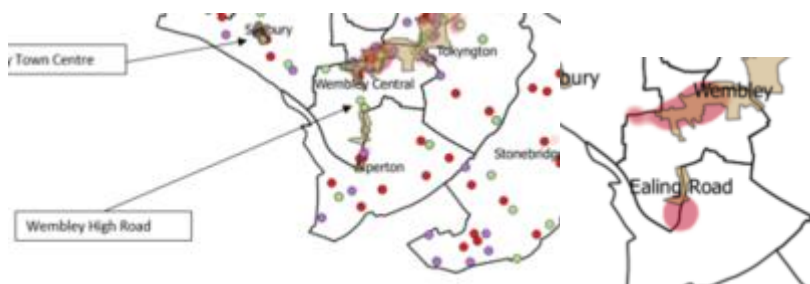
Street Drinking Hotspots

There are relatively few calls to police specifically about street drinking. This may be because they are recorded as other ASB types such as littering or noise. Between 01/06/2017 and 31/05/2018, there were only 53 calls to police. The following year, there were 142. This represents an increase of 168%. Part of this increase may be attributed to callers being aware of the borough wide PSPO on drinking in public which came into effect in October 2017.



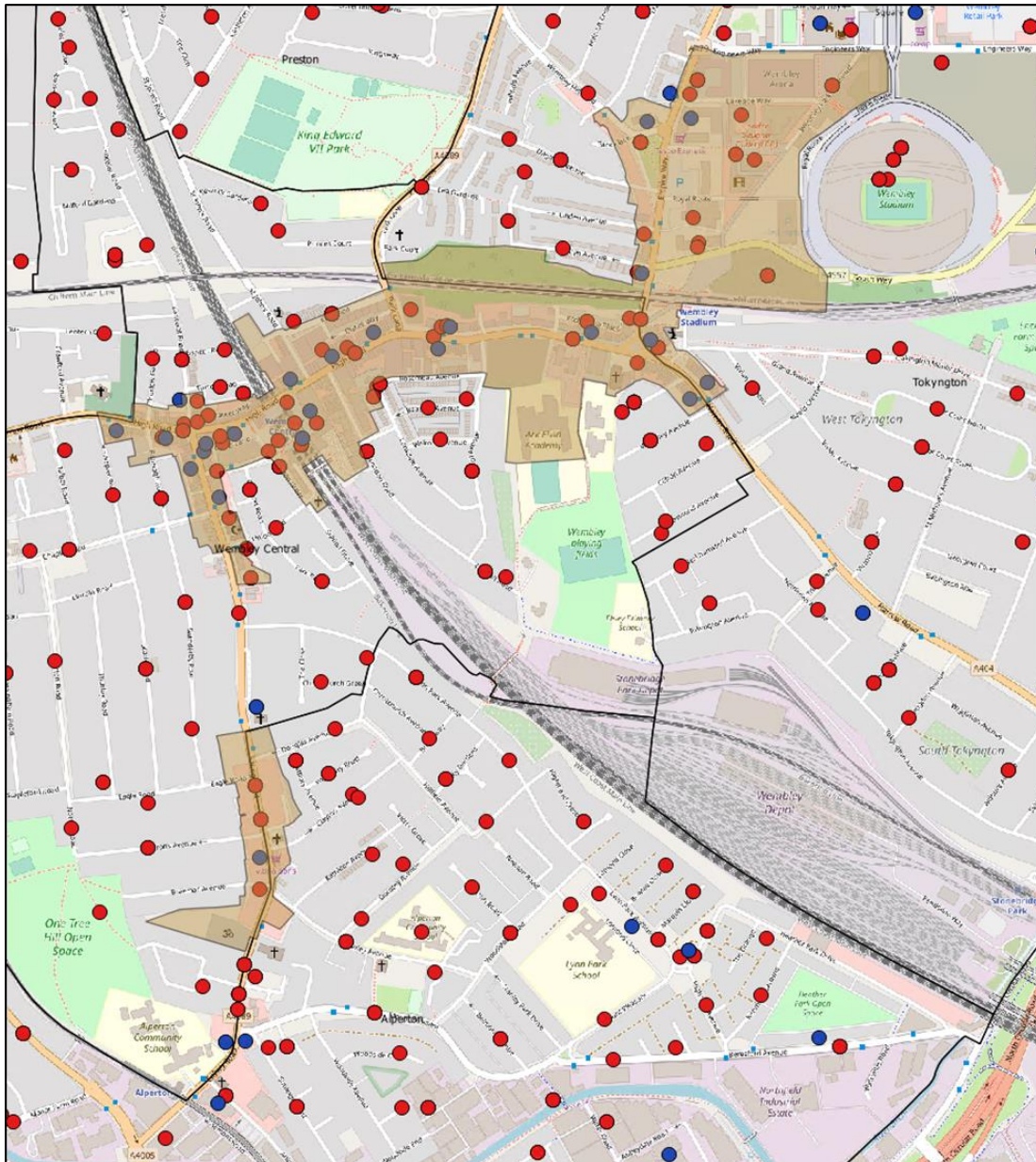
Calls to police specifically related to street drinking between 01/06/2017 and 31/05/2019

Hotspots in Brent in Ambulance and Police alcohol flagged call out data

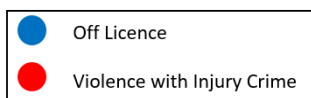


Alcohol-related ambulance and Police calls between 01/06/2017 to 31/05/2019

Hotspot of Violence with Injury Crimes

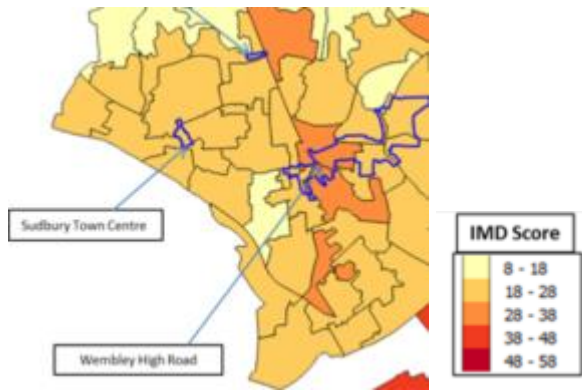


All violence with injury crimes and offences in Wembley (01/06/2017 and 31/05/2019)



Brent Index of Multiple Deprivation (IMD) score 2015 by Lower Super Output Areas

The Index of Multiple is made up of income deprivation, employment deprivation, education, skills and training deprivation, health deprivation and disability, crime, barriers to housing services and living environment.



Brent Index of Multiple Deprivation (IMD) score 2015 by Lower Super Output Areas

The purpose of the CIZ in Wembley Central and Ealing Road, is to address the issues mentioned above.

Evidencing the premises as being located in the CIZ

I am aware that the applicant questioned whether this premises fell within a CIZ because of its location. Below is the information taken from the Licensing Policy which confirms that the application for this off-licence does in fact fall within the CIZ.

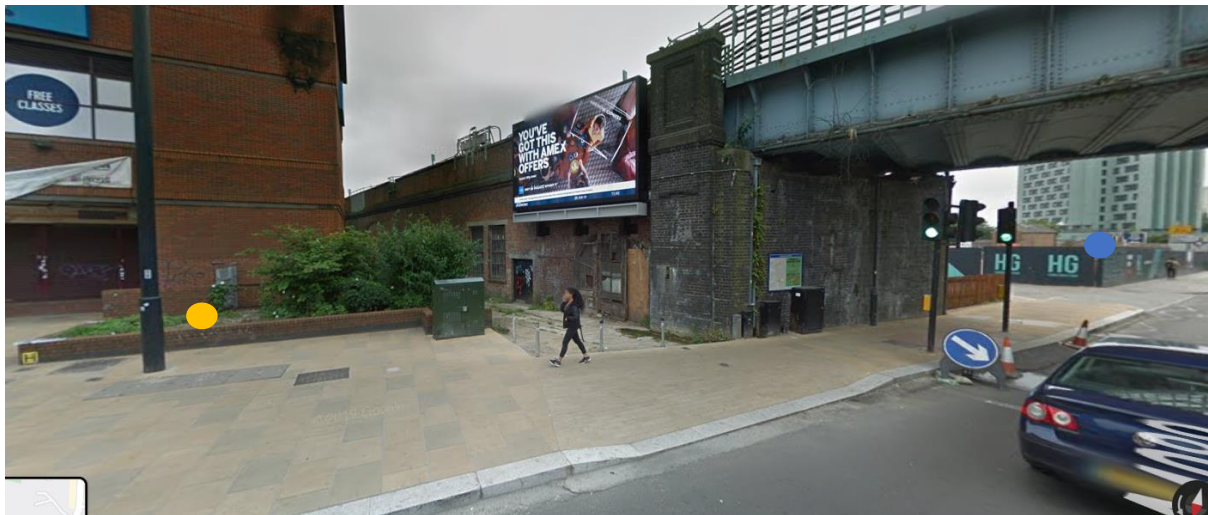
'Any premises that are physically located, whereby any part of a building faces onto any of the above main roads and although the address does not form part of the above named road, it will be included in the CIZ. For e.g. a premises building that is positioned on the corner of Ealing Road and Braemar Avenue but where the address is Braemar Avenue, this premises will be included in the CIZ'.



In this case the building is located on Ealing Road and although it is unclear from the premises plan whether the entrance faces onto the section of Ealing Road that is included in the CIZ or not, the actual building falls within the CIZ.

where the proposed premises (marked in blue) is located in relation to where street drinking issues took place (marked in yellow). A sea of empty beer cans were frequently left behind a sectioned off brick wall shown in the photographs further below.

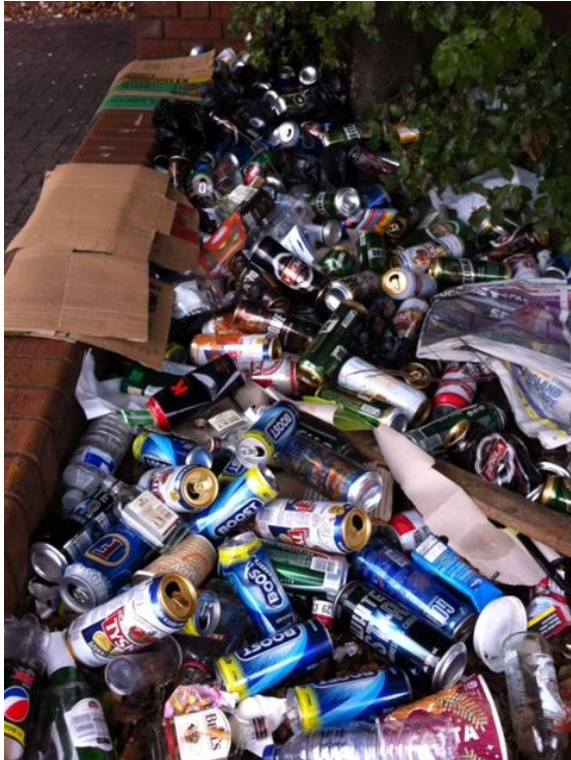
The proposed application is for the building marked near 'HG' in the photograph below, which shows where street drinkers used to frequent.



Key:
Location where street drinkers were known to drink ●
Proposed off licence ●



Ealing Road – Photograph taken 16th November 2017 @ 10.30am



Ealing Road – Photograph taken 16th November 2017 @ 10.30am



Ealing Road – Photograph taken 16th November 2017 @ 10.30am

As a result of an increase in complaints and enforcement action, the street drinkers no longer frequent this area. This however has not resolved the problem, but instead moved it to another location. The local Anti-Social Behaviour officer has advised that the street drinkers have now

moved off the main thorough-fare onto the end of Atlip Road, where they drink on top of and underneath the canal bridge.

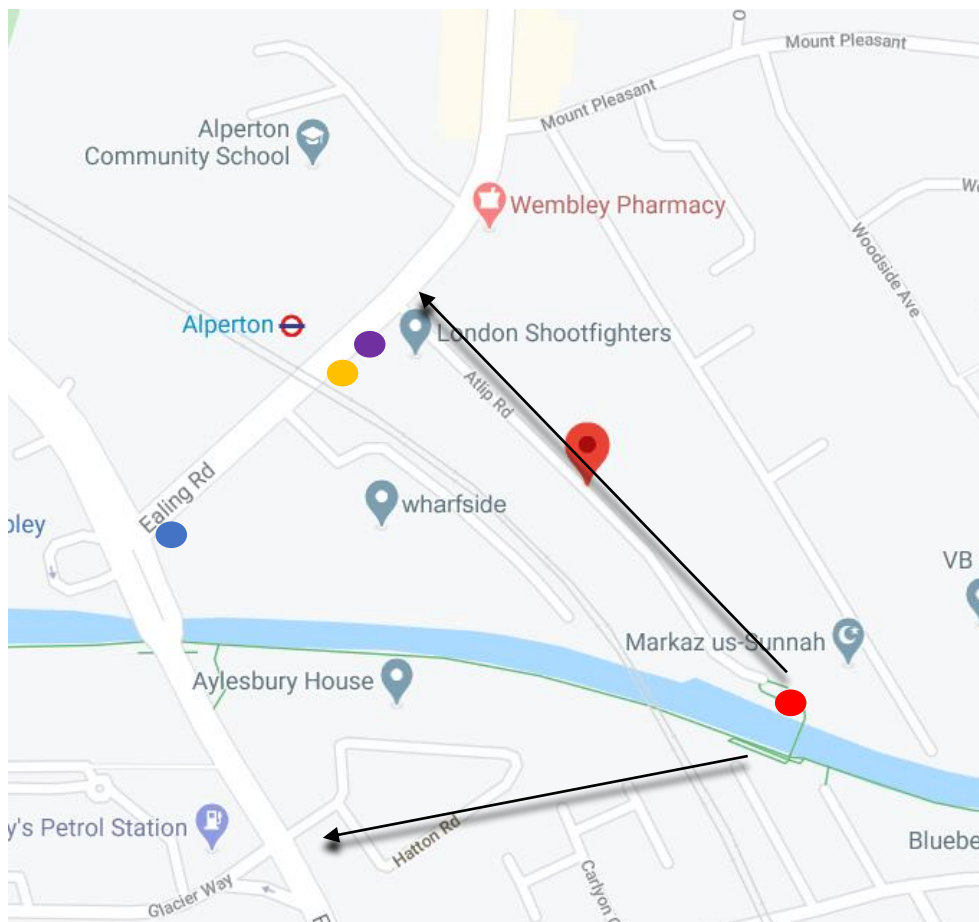
The street drinkers then use this bridge to cross over back down the side roads and then onto Ealing Road or go back up Atlip Road to return to the other side of Ealing Road, creating a square like area where the problem persists.



Atlip Road - Canal Bridge where street drinkers frequent



Atlip Road - Canal Bridge where street drinkers frequent



Key:

Existing off licences

Proposed off licence

Where street drinkers used to frequent

Where street drinkers currently frequent

Direction street drinkers walk to get back onto Ealing Road

Public Space Protection Order (PSPO)

The entire Borough of Brent is subject to a Public Space Protection Order for street drinking and therefore it is an offence to drink alcohol in any public place.

If a police officer reasonably believes that a person is, or has been, consuming intoxicating liquor within these areas, the officer may require the person concerned:

- a) not to consume in that place anything which is, or which the officer reasonably believes to be, intoxicating liquor
- b) to surrender anything in his/her possession which is, or which the officer reasonably believes to be, intoxicating liquor or a container for such liquor (other than a sealed container)
- c) An officer may dispose of anything surrendered to him/her as above.
- d) Issue fixed penalty notices on offenders
- e) Prosecute persistent offenders

However, in reality there are limited police officer resources, which in practice would prevent the above from being enforced. This therefore places a greater emphasis on the responsibility of those premises that are selling alcohol for consumption off the premises. It is clear that if off licences did not exist, the number of street drinkers would decline.

Therefore simply selling alcohol to customers who once off the premises, are no longer the responsibility of the licence holder, the Designated Premises Supervisor (DPS) and/or members of staff is no longer a viable option.

Linking Street Drinkers to Off-Licences

It is increasingly difficult to link issues with off-licences who serve street drinkers. Street drinkers are reluctant to give up information on where they have purchased their alcohol so as not to alert enforcement officers.

In the case of the locality of this premises, it is clear that street drinkers are happy to walk some distance to ensure they can drink without being seen. It can therefore be difficult to know where street drinkers have purchased alcohol when they no longer stay close to the premises where they have purchased the alcohol.

Historically street drinkers were also obvious in appearance. This is no longer the case, making it difficult for check-out staff to differentiate, therefore creating a pressure on them when selling alcohol.

Premises Licence Application

Operational Plan, Local Research & Conditions

The application which proposes a number of conditions, does not appear to consider customers once they leave the premises.

Simply listing a number of conditions without any type of substantive operational plan for example, appears inadequate. The Licensing Authority would expect to see information on how the business plans to ensure that their particular premises will go above and beyond in promoting the licensing objectives in an area located within a CIZ.

There has been no indication that the premises has done any research on issues such as street drinking in the immediate area and presented the outcome of those findings with the application. Even if it is the case that the street drinkers who drink on Atlip Road weren't discovered during such research, it would go a long way in showing that the premises had attempted to understand the local issues.

This would go some way in reassuring the Licensing Authority that the business has tried to consider whether the impact of adding an additional off licence would in fact impact the area before signing a lease (an assumption is made here that this has already taken place) to add a further supermarket to this area.

Safeguarding the Local Area

The Statement of Licensing Policy lists considerations to be made when applying for a new premises licence, particularly those considerations relating to street drinking.

However, the conditions that are mentioned in the application fail to address the likes of such things outside of the premises that could be directly linked back to the premises. This includes items such as the clearing up of litter which may be left outside the premises by customers, the labelling of alcohol with the premises name in order to link street drinkers back to the premises or measures to discourage street drinkers from loitering outside the premises.

The application also suggests an alcohol content of up to 6.5%, despite Brent's pool of model conditions setting a suggested limit of 6%. Although the applicant would not necessarily know that a suggested limit exists, they could have made enquiries prior to making an application.

Although 6.5% is not the same as some of the higher strength alcohol that exists, Brent Council's Statement of Licensing Policy makes it clear that a voluntary offering of a ban on high strength alcohol sales does not necessarily address the requirements under a Cumulative Impact Zone.

Further, there is no definition of 'speciality/artisan' when referring to beer, lager or cider and therefore it would be impossible to enforce this. A number of beer suppliers have for example included the word 'premium' on their products in order to get around local authority conditions.

The application proposes that alcohol is sold from 07.00hrs which again does not give the Licensing Authority any reassurance that the premises has taken any of the local issues into consideration.

Summary

The Statement of Licensing Policy states that any licence application in a CIZ area will need to demonstrate with evidence that its operation will not add to any cumulative impacts that the CIZ is seeking to address. Further, new applicants and those applying for variations would be required to demonstrate how their premises will not contribute to street drinking in those areas.

The effect of adopting a CIZ is to "create a rebuttable presumption" that applications for licences which are likely to add to the existing cumulative impact will normally be refused (or subject to certain limitations) unless the applicant can demonstrate that there will be no negative cumulative impact on the licensing objectives.

Other than the list of proposed conditions, the application and operating schedule fails to demonstrate that a grant will not lead to a negative cumulative impact on one or more of the licensing objectives and to the contrary add to the issues of an existing saturated area.

It is on this basis, that the Licensing Authority ask that the application for a new premises licence is refused by the Licensing Sub-Committee. Adding conditions to a premises licence, in the Licensing Authority's opinion is not adequate when the application does not demonstrate what is being put in place in order to avoid further cumulative impact. Adding an off licence to the immediate area, will no doubt be detrimental to the local area.

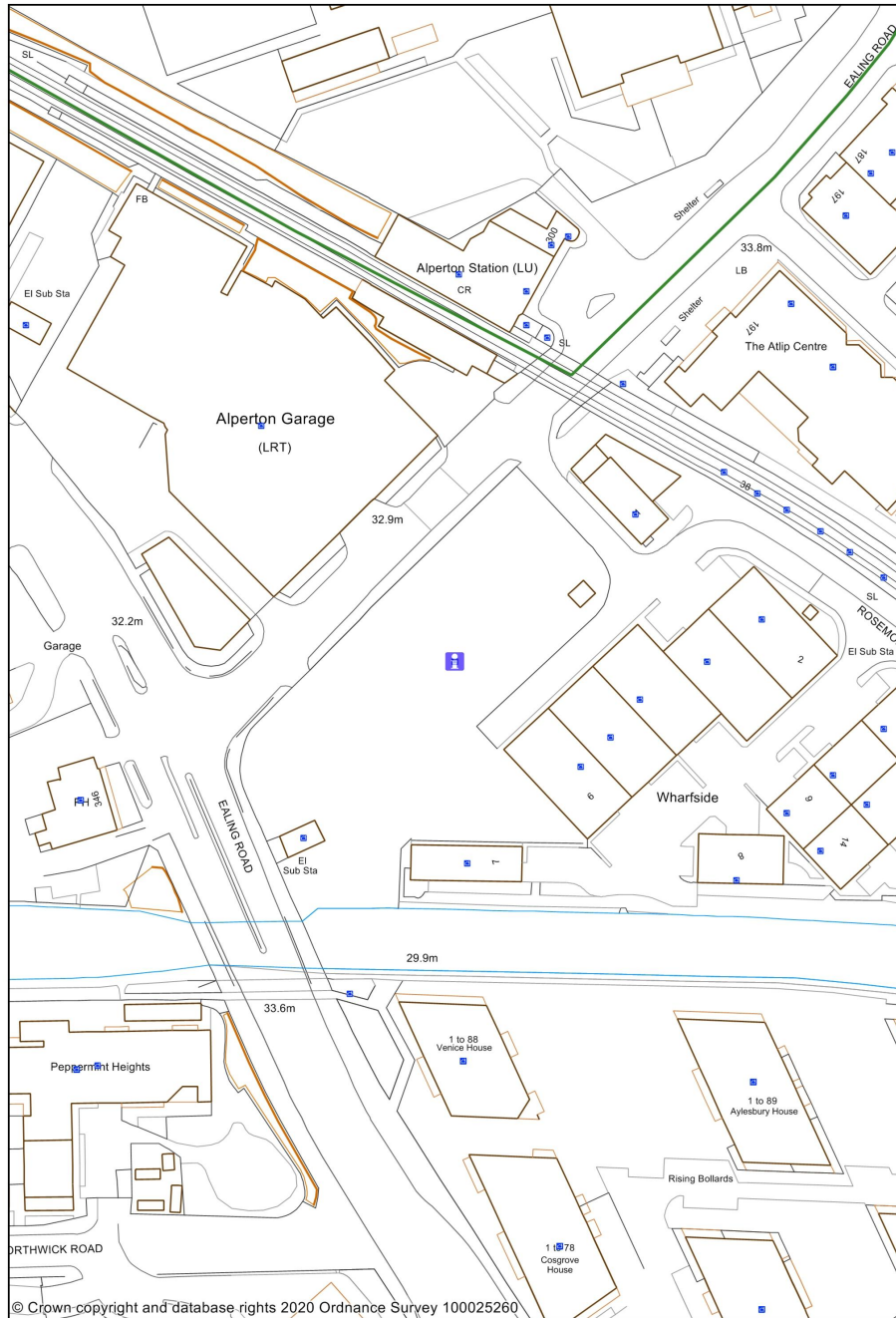
Yours faithfully



Susana Figueiredo
Licensing Inspector
Regulatory Services

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Lidl, Minavil House, Ealing Road Wembley



1:1250

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Gambling Act 2005

Application for an Adult Gaming Centre

1. The Application

Name of Applicant:	Future Leisure Ltd
Name & Address of Premises:	141 Kilburn High Road, NW6 7HT
Applicants Agent:	Andrew Woods – Woods Whur 2014 Ltd

The application is for an Adult Gaming Centre licence.

2. Background

The applicant holds another licence at 9A Walm Lane NW2 5SJ

3. Relevant Representations

Representations were received and withdrawn from the Licensing Police and Licensing Officers. Representations remain outstanding from local residents and a trade objector.

4. Interested Parties

None

5. Policy Considerations

None specific

6. Associated Papers

- A. Copy of Application Form
- B. Copies of Representations
- C. Location Map

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**Application for a premises licence
under the Gambling Act 2005 (standard form)**

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is -

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

Part 1 - Type of premises licence applied for

Regional Casino ☐

Large Casino ☐

Small Casino ☐

Bingo ☐

Adult Gaming Centre ☒

Family Entertainment Centre ☐

Betting (Track) ☐

Betting (Other) ☐

Do you hold a provisional statement in respect of the premises? Yes ☐ No ☒

If the answer is "yes", please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

Part 2 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A

Individual Applicant

1 Title: Mr ☐ Mrs ☐ Miss ☐ Ms ☐ Dr ☐ Other (please specify)

2 Surname: [*****] Other name(s): [*****]

3 Applicant's address (home/business -):

[*****]

[*****]

[*****]

[*****]

Postcode: [*****]

4(a) The number of the applicant's operating licence (as set out in the operating licence): [*****]

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: [*****]

5 Tick the box if the application is being made by more than one person. ☐

Section B

Application on Behalf of an organisation

6 Name of applicant business or organisation: Future Leisure Limited

7. The applicant's registered or principal address:

Unit 20 Fleetway Business Park

14 - 16 Wadsworth Road

Greenford, Middlesex

Postcode: UB6 7LD

- 8(a) The number of the applicant's operating licence (as given in the operating licence):
000-036646-N-318600-012
- 8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: [*****]
- 9 Tick the box if the application is being made by more than one organisation. ☐

Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known):
11. Address of the premises (or, if none, give a description of the premises and their location):
141 Kilburn High Road, London
Postcode: NW6 7HT
- 12 Telephone number at premises (if known): [*****]
- 13 If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

The premises are a vacant betting shop on the ground floor of a four storey building.
- 14(a) Are the premises situated in more than one licensing authority area? No
- 14(b) If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, other than the licensing authority to which this application is made:

[*****]

Part 4 – Times of Operation

15(a) Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? No

15(b) If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

	Start	Finish	Details of any seasonal variation
Mon			[*****]
Tues			[*****]
Wed			[*****]
Thurs			[*****]
Fri			[*****]
Sat			[*****]
Sun			[*****]

16 If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates:

[*****]

Part 5 - Miscellaneous

17 Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued): ASAP

18(a) Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? No

18(b) If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application. ☐

19(a) Do you hold any other premises licences that have been issued by this licensing authority?

Yes

19(b) If the answer to question 19(a) is yes, please provide full details:

Premises at 9a Walm Lane, London, NW2 5SJ

20 Please set out any other matters which you consider to be relevant to your application:

[*****]

Part 6 – Declarations and Checklist (Please tick)

I/ We confirm that, to the best of my/ our knowledge, the information contained in this application is true. I/ We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application. ☒

I/ We confirm that the applicant(s) have the right to occupy the premises. ☒

Checklist:

- Payment of the appropriate fee has been made/is enclosed ☒
- A plan of the premises is enclosed ☒
- I/ we understand that if the above requirements are not complied with the application may be rejected ☒
- I/ we understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities ☒

Part 7 – Signatures

21 Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature: 

Print Name: Woods Whur 2014 Limited

Date: 7 May 2020 Capacity: Solicitors for the Applicant

22 For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: [*****]

Date: (dd/mm/yyyy) Capacity: [*****]

Part 8 – Contact Details

23(a) Please give the name of a person who can be contacted about the application: Andrew Woods

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted: 0113 234 3055 or 07738 170138

24 Postal address for correspondence associated with this application:

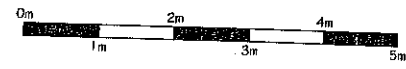
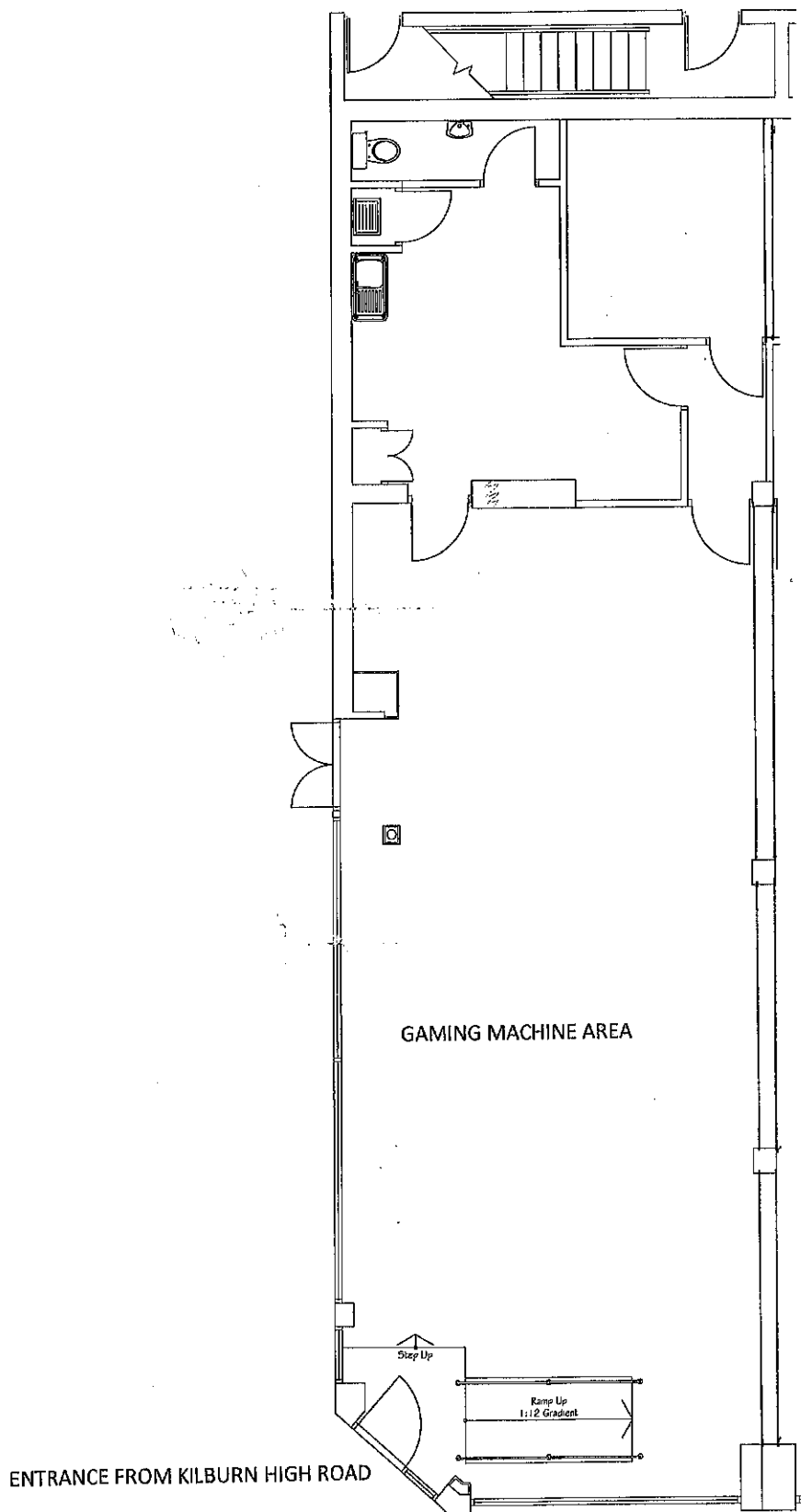
Woods Whur 2014 Limited

St James House

28 Park Place, Leeds

Postcode: LS1 2SP

25 If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:
andrew@woodswhur.co.uk



Future Leisure Ltd
141 KILBURN HIGH ROAD
KILBURN
LONDON
NW6 7HT
PROPOSED LAYOUT
Scale 1:100 @ A4
Drg: WH/K/02 prop

KILBURN HIGH ROAD

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Local Area Gambling Risk Assessment

Premises Address:	141 Kilburn High Road, London, NW6 7HT
Local Authority:	London Borough of Brent
Premises Licence No:	Application Stage GRA
Operating Licence No:	000-036646-N-318600-012
Company Details:	Future Leisure Limited, Unit 20 Fleetway West Business Park, 14-16 Wadsworth Road, Greenford, Middlesex, UB6 7LD
Name of Assessor:	Anna Zietkiewicz
Date Of Assessment:	May 2020
Review Date:	On opening in conjunction with local staff

Local Area

Future Leisure Limited offers various types of gaming machines, providing customers an opportunity to gamble, meet and socialise in a safe and controlled environment. We offer various types of gaming machines. Machines played by inserting cash (not credit cards or debit cards)

- Category B3 Max. stake £2 Max. prize £500
- Category B4 Max. stake £2 Max. prize £400
- Category C Max. stake £1 Max. prize £100
- Category D Max. stake 10p Max. prize £5

This Local Area Gambling Risk assessment takes into account the London Borough Of Brent Gambling Policy & Local Area Profile effective from 2019. The applicant takes into account all matters referred to in the Policy and will continue to do so during the application process and thereafter. Any Local gambling Risk assessment will continue to be assessed and evolve and this will be the case with this assessment.

It is relevant to note that these premises have operated as a Betting office for some time and the proposal is to replace one Gambling Premises Licence with another and not to create a new and additional Gambling Premises Licence.

The applicant is aware of and has taken into account, in this Risk Assessment, the following:-

- *Relevant Guidance from the Gambling Commission.*
- *The Councils Statement of Gambling Policy 2019-2022.*
- *The Councils Gambling Local Area Profile.*
- *The history of this and other gambling premises in this area.*
- *Its own appraisal of local conditions.*

It has considered all relevant information relating to the Licensing Objectives, demographics and crime levels and will continue to do so. This Local Area Risk Assessment takes into account these factors in assessing risk and reflects them in its provisions to inform the proper and safe conduct of the premises without exacerbating the local problems referred to or causing others.

Local Area			
Licensing Objective	Risks	Existing Control Measures	Level of Risk of Occurrence / Manageability
1.1 Protecting children and other vulnerable persons from being harmed or exploited by gambling	LOCALITY <ul style="list-style-type: none"> Teddies Nurseries Ltd, 2 West End Ln, North Maida Vale, London NW6 4NT Villas Nursery. 78a Brondesbury Villas, North Maida Vale, London NW6 6AD PMC Nursery, 91 Kingsgate Rd, Kilburn, London NW6 4JY Abacus Ark Nursery Schools, Maida Vale. Regents Plaza Apartments, Units 1-4 The Parade, Kilburn High Rd, London NW6 5TR Centro Infantil Menchu (Menchu Nursery). 10 Kingsgate Pl, Kilburn, London NW6 4TA Acol Nursery Centre. 16 Acol Rd, London NW6 3AG Bright Horizons West Hampstead Day Nursery and Preschool. 11 Woodchurch Rd, London NW6 3PL Treetops Kilburn. Kilburn Ln, North Maida Vale, London NW6 6PT Chaston Nursery School. 30-31 Palmerston Rd, Kilburn, London NW6 2JL The Learning Tree Nursery. Quex Rd, North Maida Vale, London NW6 4PS St Eugene De Mazenod. Mazenod Ave, Kilburn, London NW6 4LS St Mary's C Of E Primary School. Quex Rd, North Maida Vale, London NW6 4PG Christ Church C Of E Primary School. Clarence Rd, Kilburn, London NW6 7TE 	<ul style="list-style-type: none"> Staff to 'patrol' – supervising the whole of the premises. Implementation of the BACTA Toolkit policies & procedures including Think/Challenge 25. Return the stake / retain the prize Anyone reluctant in providing identification with suspicious behaviour will trigger further investigation. Incident to be logged and customer removed from the area. Age verification incident report (log) maintained on licensed premises and reviewed on regular basis by team staff members. Training of staff with 6 monthly refreshers / local area profile / licence conditions. Training and guidance is provided to staff members regarding customer interaction and the implementation of the ID verification procedure. 	Medium Of Occurrence Initially / Low of not managing

		<ul style="list-style-type: none"> • Kingsgate Primary School. 96 Kingsgate Rd, Kilburn, London NW6 2JG • St Mary's Catholic Primary School. Canterbury Rd, North Maida Vale, London NW6 5ST • La Jolie Ronde Languages For Children. 55 Chichester Rd, North Maida Vale, London NW6 5QW • N Family Club - West Hampstead Nursery, 13 Woodchurch Rd, London NW6 3PL • Naima Preparatory School. 21 Andover Pl, North Maida Vale, London NW6 5EL • Kilburn Grange School. Priory Park Rd, North Maida Vale, London NW6 7UJ • St Augustine's CE High School. Oxford Rd, North Maida Vale, London NW6 5SN • ICMP Music College. 1B Dyne Rd, Kilburn, London NW6 7XG • London Music Academy. 19 Lonsdale Rd, Queen's Park, London NW6 6RA • London Piano Academy. 15 Tennyson Rd, North Maida Vale, London NW6 7RT • Helen O'Grady Drama Academy, 28 Mazonod Ave, Kilburn, London NW6 4LR • Qalam (Islamic) Education Resource Centre, 292-294 Kilburn High Rd, Kilburn, London NW6 2DB 	<ul style="list-style-type: none"> • Review self-excluded data to ensure continued exclusion. • Regular patrols of the premises, including external areas to identify any vulnerable and children. • Recording & reporting concerns to the police. • Regular Test Purchasing. • "Know Your Customer" in place, developing customer interaction policies & procedures (importance of behaviour, time and spend limits). • Staff monitors customer activity and behaviour to interact early to recognise customer with potential gambling issues. • Staff to be aware of the importance of social responsibility, the causes and consequences of gambling. • Adequate staffing levels to be maintained at all times. • Sharing of information by staff regarding concerns about customers. • Mystery shopper tests by BACTA. • Information readily available to customers on how to gamble responsibly and how to access information about and in respect of gambling problem. 	
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		<p><u>OTHER:</u></p> <p><u>Student accommodation:</u></p> <ul style="list-style-type: none"> • Hello Student Accommodation, Francis Gardner Apartments. 89-91, West End Ln, London NW6 4SY • Canterbury Student Accommodation. 70 Kingsgate Rd, Kilburn, London NW6 4TE <p><u>Family Services/Council Housing offices</u></p> <ul style="list-style-type: none"> • UCKG HelpCentre Kilburn, 234 Kilburn High Rd, Kilburn, London NW6 4JR • Brent Hub Kilburn, Albert Road, South Kilburn, NW6 5DE <p><u>Job centre/ recruitment agency</u></p> <ul style="list-style-type: none"> • K R C Recruitment Ltd, 76 Willesden Ln, Kilburn, London NW6 7TA • Reliance Domestic, 254 Belsize Rd, North Maida Vale, London NW6 4BT • Creche Angels, 90A Kingsgate Rd, Kilburn, London NW6 4TE • The Supply Room, 2 West End Ln, North Maida Vale, London NW6 4NT • Travel Work and Study Ltd, 128, 268 Belsize Rd, North Maida Vale, London NW6 4BT 	<ul style="list-style-type: none"> • Posters, 'Stay in Control' leaflets and GamCare leaflets (near toilets as well as in the main trading area). • Self-exclusion system in place provided by BACTA. • Photo equipment available for self-exclusions. • Ensure a stock of leaflets (stay in control and self-exclusion) through weekly checks of stock. • GamCare stickers with contact number clearly displayed on machines. • Staff to be trained in Safeguarding Policy. • Staff Crime Prevention training. • Contact/sharing information with AGC operators within ½ mile (co-ordinated through BACTA) Staff to be aware of refusing customers entry due to alcohol or drugs. 	
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		<p><u>Community centres/Libraries</u></p> <ul style="list-style-type: none"> • Abbey Community Centre. 222C Belsize Rd, London NW6 4DJ • Kingsgate Community Centre. 107 Kingsgate Rd, West Hampstead, London NW6 2JH • International Gospel Community Centre. 264 Belsize Rd, North Maida Vale, London NW6 4BT • Mazenod Social Club. Mazenod Ave, Kilburn, London NW6 4LS • Casa Do Brasil Em Londres, 64-66 Willesden Ln, Kilburn, London NW6 7SX • Kingsgate Resource Centre, 208 Webheath, Palmerston Rd, London NW6 2JU • 68 Learn to Fly Center, 68 Priory Rd, London NW6 3HL • Somali Cultural Centre Camden, 107 Kingsgate Rd, West Hampstead, London NW6 2JH • Kilburn Library Centre, 12-22 Kilburn High Rd, North Maida Vale, London NW6 5UH <p><u>Youth Club</u></p> <p>No youth Club within distance</p> <p><u>Care Home</u></p> <p>No care homes within distance</p>	<ul style="list-style-type: none"> • Staff trained to take all reasonable steps to refuse service or otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling. • Staff trained to take all reasonable steps to prevent any marketing material being sent to a self-excluded customers. • Staff to be aware of refusing customers entry due to alcohol or drugs. • CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online.. • Premises laid out to avoid blind spots. • Ensure entrance readily visible from throughout the premises. • Signage & window display not to attract under 18s, and advice under 18's access is prohibited. 	
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		<p><u>GP/Medical Centre</u></p> <ul style="list-style-type: none"> • Belsize Priory Medical Practice, 208 Belsize Rd, London NW6 4DX • The Lonsdale Medical Centre, 24 Lonsdale Rd, Queen's Park, London NW6 6RR • Kilburn Park Medical Centre, 12 Cambridge Gardens, North Maida Vale, London NW6 5AY • Brondesbury Medical Centre, 279 Kilburn High Rd, Kilburn, London NW6 7JQ <p><u>Supervised Pharmacies</u></p> <p>No supervised pharmacy within distance</p> <p><u>Faith premises/public worship</u></p> <ul style="list-style-type: none"> • Quex Road Methodist Church, 3 Kingsgate Rd, Kilburn, London NW6 4TD • Sacred Heart Church, Quex Rd, Kilburn, London NW6 4PS • Ruach City Church, 197-199 Kilburn High Rd, Kilburn, London NW6 7HY • Kilburn Evangelical Free Church, 4 Aldershot Rd, North Maida Vale, London NW6 7LG • St Mary with All Souls, 134A Abbey Rd, London NW6 4SN • Potters House Christian Church Kilburn, LDBS SCITT, 2 West End Ln, North Maida Vale, London NW6 4NT 	<ul style="list-style-type: none"> • Monitoring customers as they leave the premises • Machines to be properly labelled • The entrance layout enable staff to monitor those entering the premises • Supervision of entrances and machine area. 	
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		<ul style="list-style-type: none"> • Divine Healing Church Of Christ,207 Willesden Ln, Kilburn, London NW6 7YR • Kilburn SDA church,6A Springfield Ln, North Maida Vale, London NW6 5UB • Islamic Centre of England,140 Maida Vale, Kilburn, London W9 1QB • Kilburn Muslim Welfare Association,217 Belsize Rd, North Maida Vale, London NW6 4AA • Kilburn & hamstead centre,237 Kilburn High Rd, Kilburn, London NW6 7JN <p><u>Mental Health:</u></p> <ul style="list-style-type: none"> • NW6 PSYCHOTHERAPY SERVICES. 50 Priory Rd, London NW6 3RE • Daniela Bailey Therapy. 20 Lonsdale Rd, Queen's Park, London NW6 6RD • The Minster Centre. 20 Lonsdale Rd, Queen's Park, London NW6 6RD • Jonathan Livingstone Therapy & Training. 28 Brondesbury Villas, North Maida Vale, London NW6 6AA • 15 Brondesbury Road Medical Centre. 15 Brondesbury Rd, North Maida Vale, London NW6 6BX • Brigitta Mowat,88 Tennyson Rd, Kilburn, London NW6 7SB • psychotherapy and counselling,97 Brondesbury Rd, Queen's Park, London NW6 6RY • The Minster Centre, 20 Lonsdale Rd, Queen's Park, London NW6 6RD 		
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		<ul style="list-style-type: none"> • Fergus Cairns, 10 Muswell Hill, Queen's Park, Kilburn NW6 6NN • Pier Luigi Ceccarelli Counselling and Psychotherapy NW6, 241 Kilburn High Rd, Kilburn, London NW6 7JN • Nicole Castellani counsellor and psychotherapist, 23 Kingsgate Rd, Kilburn, London NW6 4TD • Nadia Hilton психолог в Лондоне, 83 Willesden Ln, North Maida Vale, London NW6 7RR • Piero Dell'Anno, Hilltop Rd, West Hampstead, London NW6 2AA • C N W L, 15 Brondesbury Rd, North Maida Vale, London NW6 6BX <ul style="list-style-type: none"> • <u>Addiction/Recovery Centres/support services</u> <ul style="list-style-type: none"> • UCKG HelpCentre Kilburn, 234 Kilburn High Rd, Kilburn, London NW6 4JR 		
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		<p><u>Homeless centres/Sheltered Housing</u></p> <ul style="list-style-type: none"> • St Mungo's: Chichester Road, Brent. (Charity). 53 Chichester Rd, North Maida Vale, London NW6 5QW • Irish Centre Housing, 12 Kingsgate Rd, Kilburn, London NW6 4TB • The Salvation Army (Kilburn), 55 Chichester Rd, North Maida Vale, London NW6 5QW <p><u>Hospitals</u></p> <p>No hospitals within distance</p> <p><u>Loan Shops, Pawn Brokers, Food Banks</u></p> <ul style="list-style-type: none"> • H&T Pawnbrokers. 9 Kilburn High Rd, North Maida Vale, London NW6 6HT • H&T Pawnbrokers. 139 Kilburn High Rd, North Maida Vale, London NW6 7HR • Cash Converters. 315 Kilburn High Rd, Kilburn, London NW6 7JR • H&T Pawnbrokers. 63 Kilburn High Rd, North Maida Vale, London NW6 5SA <p><u>Bank/Building Societies</u></p> <ul style="list-style-type: none"> • Santander, 131-135 Kilburn High Rd, North Maida Vale, London NW6 7HS • NatWest Bank, 127 Kilburn High Rd, 		
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		<p>North Maida Vale, London NW6 6JL</p> <ul style="list-style-type: none"> • Natwest, 1 Abbey Rd, London NW10 7YQ • Lloyds Bank, 106 Kilburn High Rd, Kilburn, London NW6 4HY • Nationwide Building Society, 48a Kilburn High Rd, Kilburn, London NW6 4HJ <p><u>Leisure/entertainment centres</u></p> <ul style="list-style-type: none"> • Charteris (Kilburn) Sports Centre, Charteris Rd, Kilburn, London NW6 7ET • Bannatyne Health Club Maida Vale, 4 Greville Rd, North Maida Vale, London NW6 5HZ • Kiln Theatre, 269 Kilburn High Rd, Kilburn, London NW6 7JR • Kick Start Swim School, Bannatynes Health Club, 4 Greville Rd, North Maida Vale, London NW6 5HZ • Energie Fitness Gym Kilburn, 34a, 36 Kilburn High Rd, North Maida Vale, London NW6 5UA <p><u>Parks / playgrounds/basketball courts</u></p> <ul style="list-style-type: none"> • Kilburn Grange Park, Kilburn Grange Park, Kilburn NW6 2JL • Calisthenics-Park, 30-31 Palmerston Rd, West Hampstead, London NW6 2JL • Gorefield Place Open Space, 5 Chichester Rd, North Maida Vale, London NW6 5QR • Farasi Safari, 15 Dynham Rd, West 		
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		<p>Hampstead, London NW6 2NS</p> <ul style="list-style-type: none"> Kilburn Grange Park Children's Play Area, 114, 110 Kingsgate Rd, Kilburn, London NW6 2JG <p><u>Markets/Shops</u></p> <ul style="list-style-type: none"> Kilburn Market Shops within distance 		
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1.2	<p>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime</p>	<p>LOCALITY Assess threats</p> <p>PREMISES Layout to be considered</p> <ul style="list-style-type: none"> • Consider 'blind spots' • Visibility of the entrance <p>CUSTOMERS Customer behaviour</p> <p>STAFF</p> <ul style="list-style-type: none"> • Personal protection • Security • Staff behaviour <p>Listed 1 AGC and 5 betting shops within distance</p> <ul style="list-style-type: none"> • MerkurCashino, 130 Kilburn High Rd, Kilburn, London NW6 4JD • Betfred. 127 Kilburn High Rd, North Maida Vale, London NW6 6JH • William Hill. 40A Kilburn High Rd, North Maida Vale, London NW6 5UA • Paddy Power. 251, 255 Kilburn High Rd, Kilburn, London NW6 7JN • Ladbrokes. 205 Kilburn High Rd, North Maida Vale, London NW6 7HY • Ladbrokes. Kilburn Bridge House, Kilburn High Rd, Kilburn, London NW6 6HY 	<ul style="list-style-type: none"> • CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online • Social Responsibility training and incident recording logs available to all staff. • Toughened/laminated glass to front window • Machine door opening keys only available to management • Log visits by Police, Local Authority and Gambling Commission officers • Customer toilet to be kept locked at all times with access given by staff only • Review unusual patterns of play (as per PoCA), 'non-regular' players and consider exclusion/reporting • Exclude badly behaved customers • Maintain contact with local traders and Police • Limited staff floats • Staff trained to look out for unusual/dyed notes • Staff will be trained in signs of alcohol or drugs abuse 	<p>Medium of Occurrence Initially / Low of not Managing</p>
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		<p>LOCAL AREA PROFILE</p> <p>Population</p> <ul style="list-style-type: none"> According to Brent borough council, the population of Brent is estimated to be 359,700 in 2016. The 2011 Census recorded 7,667 people living in the South Kilburn area. The gender split was 50:50 Brent is the 7th largest borough in London by population and is continuing to grow. The borough's population is projected to rise by 25% by 2041 which would mean an additional 84,800 residents or around 3,900 extra residents per year. The Median age in Brent is 32, lower than the England average. The gender split is 49% female and 51% male <p>Culture</p> <ul style="list-style-type: none"> Brent and South Kilburn is one of the most culturally diverse borough's in the UK (ethnicity, country of birth, faith and language) <p>Unemployment :</p> <ul style="list-style-type: none"> According to ONS annual population survey, from Oct 2018 to September 2019 unemployment in Brent was at 4.0%, which was lower than London (4.6%) and slightly higher than Great Britain (3.9%). At the time of 2011 Census just over 	<ul style="list-style-type: none"> Any customer impaired by alcohol or drugs will be refused entry and prevented from gambling Staff & management to be alert to customers exchanging large volumes of paper notes for alternative denominations Staff to be alert to customer redeeming stake with little or no play Staff trained about AML basics, strange transaction behaviour CCTV coverage over all cash transactions TiTo machines (if present) have built in software protection to identify suspicious activity and alert staff. Fruit machines played by inserting cash (not credit cards or debit cards) Full machine audit on all machines on a weekly basis – ad hoc spot-check in case of any suspicion Gaming machines are supplied and maintained by businesses licensed by the Gambling Commission No automated ticket redemption machines used in the venue Extra Training and guidance is provided to staff members regarding Anti-Social Behaviour Staff fully trained how to deal with homeless people seeking refuge. 	
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	<p>half of the adult population in South Kilburn were in work, lower than the Borough average(54vs 60 per cent)</p> <p>Deprivation</p> <ul style="list-style-type: none">On the Index of Multiple Deprivation (2015), Brent is ranked 39th out of 326 local authorities in England. Within Brent, the ward of Kilburn was ranked the 3rd most deprived ward out of 21, <p>Crime</p> <ul style="list-style-type: none">Total number of crimes recorded in March 2020 for NW6 & 7HT area: <table><tr><td>Anti-Social Behaviour:</td><td>153</td></tr><tr><td>Burglary:</td><td>33</td></tr><tr><td>Criminal Damage and Arson:</td><td>14</td></tr><tr><td>Drugs:</td><td>9</td></tr><tr><td>Robbery:</td><td>6</td></tr><tr><td>Violence/sexual:</td><td>70</td></tr></table> <p>Transport & car park facilities:</p> <ul style="list-style-type: none">Brondesbury StationKilburn High Road SatationKilburn Park StationKilburn Markey Car ParkJustParkBrondesbury Road	Anti-Social Behaviour:	153	Burglary:	33	Criminal Damage and Arson:	14	Drugs:	9	Robbery:	6	Violence/sexual:	70	<ul style="list-style-type: none">Staff to be trained on local are risk assessmentCompany registered to receive crime bulletins from BACTA.Customer interaction may provide knowledge of criminal background and/or association leading to closer security and monitoring of such a customer.Customers are efficiently monitored throughout the time they are on the premises to satisfy age requirements, prevention of machine related crime (money laundering).Suspicious activity to be written down in the logKnowledge activity to be handed over to Nominated Officer who will then report to NCA	
Anti-Social Behaviour:	153														
Burglary:	33														
Criminal Damage and Arson:	14														
Drugs:	9														
Robbery:	6														
Violence/sexual:	70														

1.3	<p>Ensuring that gambling is conducted in a fair and open way</p>	<p>PREMISES</p> <ul style="list-style-type: none"> • Promotions • Advertising <p>EQUIPMENT</p> <ul style="list-style-type: none"> • Information clearly displayed • Maintenance • Compliance <p>CUSTOMERS</p> <ul style="list-style-type: none"> • Treatment of customers • Complaints 	<ul style="list-style-type: none"> • Clear terms & conditions provided within the licensed premises. • Game rules, gambling care providers and other relevant information are provided in both English and other prominent first language. • Information readily available to customers on how to gamble responsibly and how to access information about and in respect of gambling problems. • Machines only obtained from licensed suppliers • Machines to be properly labelled • Implementation of the BACTA Toolkit policies • Training of staff with 6 monthly refreshers • Review advertising material and promotions for compliance with LCCP • Machines to be maintained/serviced regularly • Machines to be turned off should a fault occur • Procedure for making refunds • Details of machine operation and winning combinations to be clearly shown on machines • Staff to have full understanding of stakes and prizes, and odds associated with each machine. 	<p>Low-Low</p>
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			<ul style="list-style-type: none"> • Complaints policy visibly displayed for customer information. All complaints to be fully investigated in accordance with policy and referred to nominated ADR 3rd party as required • Suitable public liability Insurance • Council conditions openly displayed • Regular Compliance Audits 	
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Gambling Operation & Physical Design (Internal and External)				
Licensing Objective		Risks	Existing Control Measures	Level of Risk of Occurrence / Manageability
2.1	Protecting children and other vulnerable persons from being harmed or exploited by gambling	<p>PREMISES</p> <ul style="list-style-type: none">• Consider 'blind spots'• Visibility of the entrance• Signage• Presentation of premises (signage/window display) <p>CUSTOMERS</p> <ul style="list-style-type: none">• U18s entering• Problem Gambling• Providing Information• Administering self-exclusion• Signage• 	<ul style="list-style-type: none">• CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online• No cash point or ATM facilities on the premises.• Premises laid out to avoid blind spots• Ensure entrance readily visible from throughout the premises• Signage & window display not to attract under 18s, and advice under 18's access is prohibited.• Machines to be properly labelled• The entrance layout to enable staff to monitor those entering the premises	Implementation of physical and design control measures will ensure low risk and effective management

2.2	<p>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime</p>	<p>PREMISES Layout to be considered</p> <ul style="list-style-type: none"> • Consider 'blind spots' • Visibility of the entrance <p>CUSTOMERS Customer behaviour</p> <p>STAFF</p> <ul style="list-style-type: none"> • Personal protection • Security • Staff behaviour 	<ul style="list-style-type: none"> • CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online • No cash point or ATM facilities on the premises. • Regular patrols of the premises , including external areas to identify any vulnerable and children • Monitoring customers as they leave the premises • Toughened/laminated glass to front window • Mag Lock on front door • Timer locked safe • Intruder alarm installed and regularly serviced • Panic Button linked to Police 	
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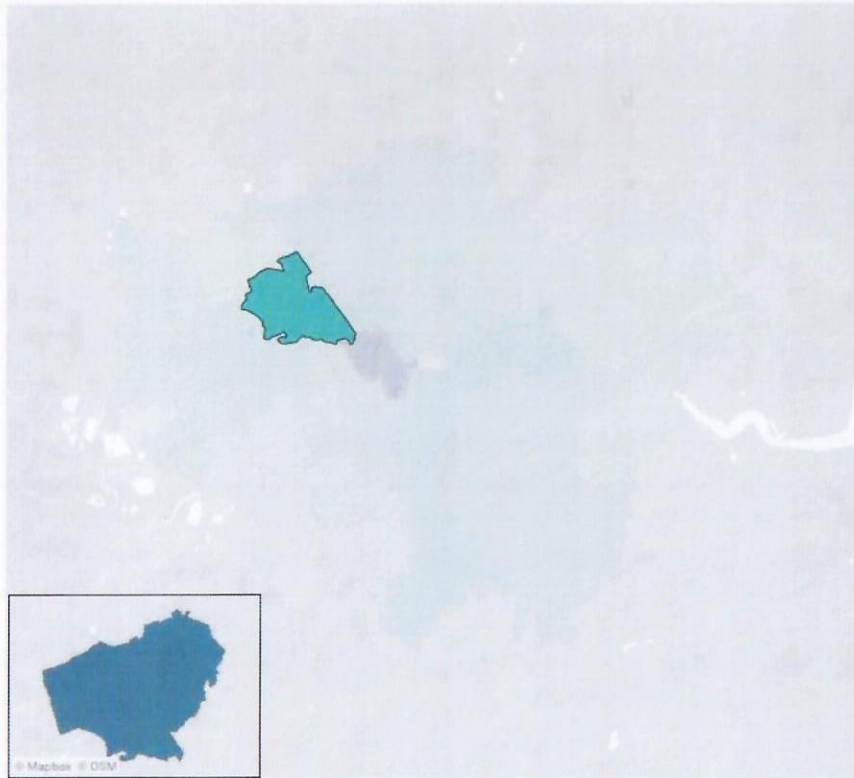
2.3	Ensuring that gambling is conducted in a fair and open way	<p>PREMISES</p> <ul style="list-style-type: none"> • Promotions • Advertising <p>EQUIPMENT</p> <ul style="list-style-type: none"> • Information clearly displayed • Maintenance • Compliance 	<ul style="list-style-type: none"> • CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online • Clear terms & conditions provided within the licensed premises. • Machines only obtained from licensed suppliers • Machines to be properly labelled • Implementation of the BACTA Toolkit policies • Machines to be maintained/serviced regularly • Machines to be turned off should a fault occur • Procedure for making refunds • Details of machine operation and winning combinations to be clearly shown on machines • Complaints policy visibly displayed for customer information. All complaints to be fully investigated in accordance with policy and referred to nominated ADR 3rd party as required • Suitable public liability Insurance • Council conditions openly displayed • Regular compliance audit 	

Action Plan

Local Area (insert number)	Gambling Operation and Physical Design (insert number)	Question	Action Required	By Whom (name)	By When (date)	Date Completed

Frequency of Review (enter time period e.g. 12 months)		Date Review Due	
Completed Risk Assessment brought to the attention of:			
Name (person responsible for premises and/or implementing control measures)	Position	Signature	Date the this assessment was brought to this persons attention
[REDACTED]	COMPLIANCE MANAGER	[REDACTED]	7/5/2020

Brent Crime Statistics April 2019-March 2020



Employment and unemployment (Jan 2019-Dec 2019)

	Hampstead And Kilburn (Numbers)	Hampstead And Kilburn (%)	London (%)	Great Britain (%)
All People				
Economically Active†	105,600	80.3	78.1	78.9
In Employment†	103,600	78.8	74.5	75.8
Employees†	79,600	60.8	61.0	64.6
Self Employed†	23,800	17.7	13.2	10.9
Unemployed§	#	#	4.6	3.9
Males				
Economically Active†	64,100	87.9	84.0	83.4
In Employment†	62,400	85.5	79.9	79.8
Employees†	52,400	72.6	62.0	65.2
Self Employed†	10,000	12.9	17.5	14.4
Unemployed§	!	!	4.9	4.1
Females				
Economically Active†	41,500	71.1	72.1	74.5
In Employment†	41,200	70.5	69.0	71.7
Employees†	27,100	46.4	59.9	64.1
Self Employed†	13,800	23.6	8.8	7.4
Unemployed§	!	!	4.2	3.7

Source: ONS annual population survey

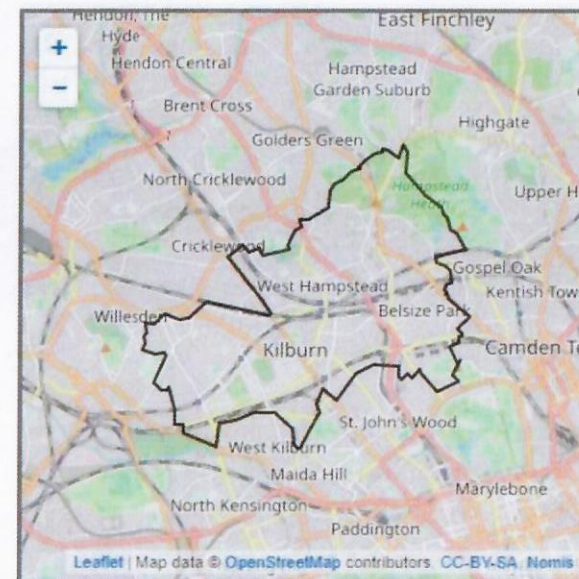
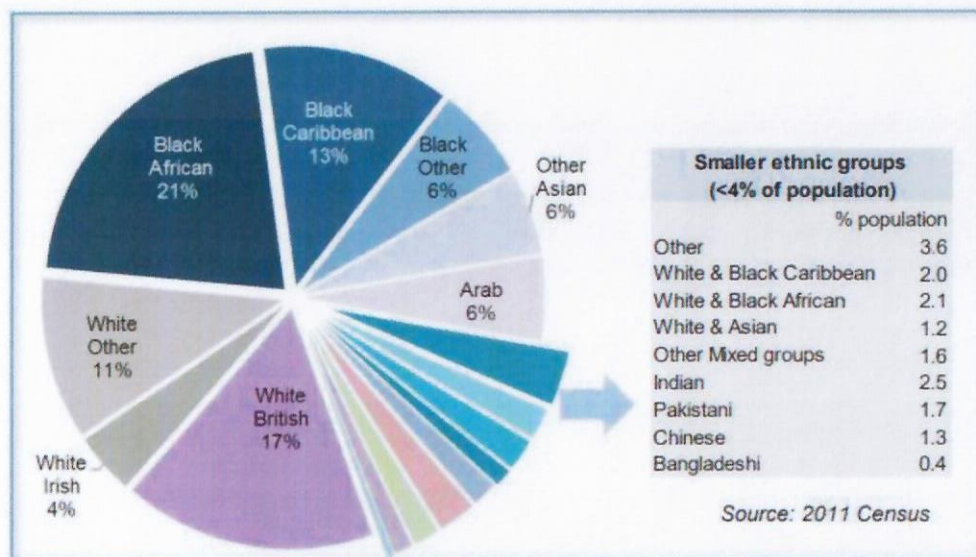
Sample size too small for reliable estimate (see definitions)

! Estimate is not available since sample size is disclosive (see definitions)

† - numbers are for those aged 16 and over, % are for those aged 16-64

§ - numbers and % are for those aged 16 and over. % is a proportion of economically active

Population by ethnic group, South Kilburn, 2011

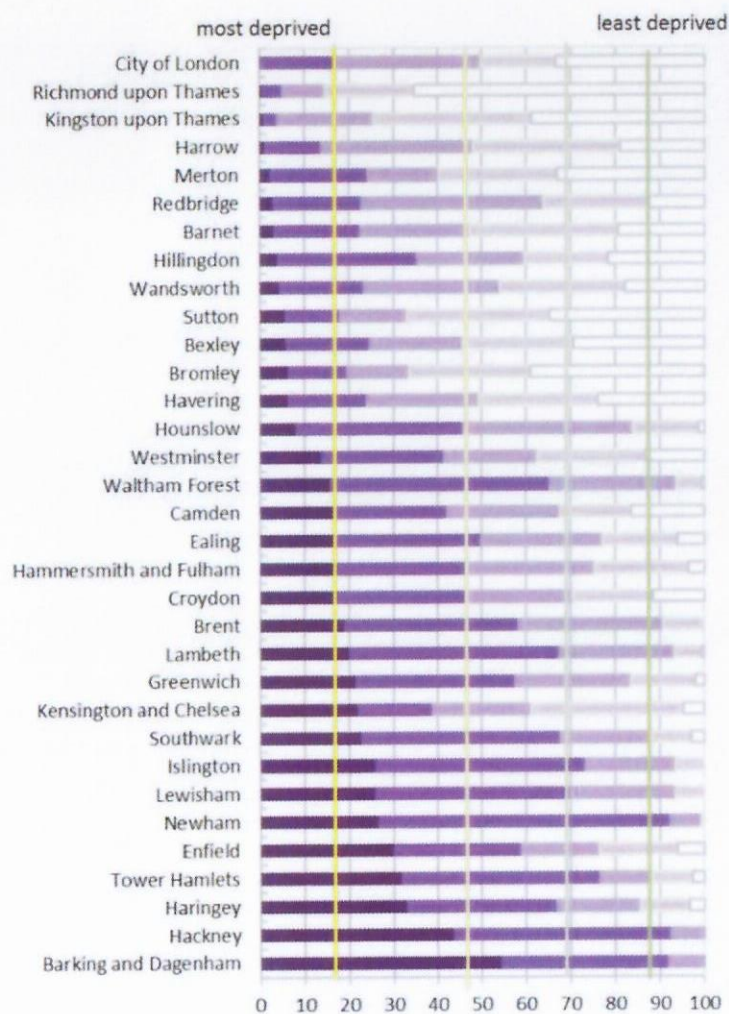


Population aged 16-64 (2015)

	Hampstead And Kilburn (Numbers)	London (Numbers)	Great Britain (Numbers)
Total	101,500	6,014,100	40,465,900
Male	51,600	3,035,800	20,187,900
Female	49,900	2,978,300	20,277,900

Source: ONS mid-year population estimates
Note: Percentages are based on total population.

Deprivation-National IMD2019 quintile distribution of LSOAs by London boroughs



The chart shows the distribution of LSOAs within the national quintiles for each London Borough. Barking and Dagenham had the highest proportion of LSOAs in the most deprived quintile in England under the 2019 ID calculations, down marginally from ID2015, but still more than half of its LSOAs were in this group, whereas the ID2015 also showed more than half of LSOAs in Tower Hamlets and Hackney were among the most deprived 20% of neighbourhoods in England. Five boroughs had no LSOAs in the least deprived quintile in ID2019 – Barking and Dagenham, Brent, Hackney, Islington, Lewisham and Newham. In contrast, almost two thirds of LSOAs in Richmond-upon-Thames ranked in the least deprived quintile.

Earnings and qualifications -ONS 2019

Qualifications (Jan 2019-Dec 2019)

	Hampstead And Kilburn (Level)	Hampstead And Kilburn (%)	London (%)	Great Britain (%)
NVQ4 And Above	83,100	65.2	54.2	40.3
NVQ3 And Above	93,600	73.5	67.0	58.5
NVQ2 And Above	103,100	80.9	78.5	75.6
NVQ1 And Above	110,000	86.4	85.0	85.6
Other Qualifications	11,800	9.2	8.3	6.7
No Qualifications	5,600	4.4	6.7	7.7

Source: ONS annual population survey

Notes: For an explanation of the qualification levels see the definitions section.

Numbers and % are for those aged 16-64

% is a proportion of resident population of area aged 16-64

Earnings by place of residence (2019)

	Hampstead And Kilburn (Pounds)	London (Pounds)	Great Britain (Pounds)
Gross Weekly Pay			
Full-Time Workers	850.7	699.2	587.0
Male Full-Time Workers	922.8	747.4	632.0
Female Full-Time Workers	803.3	655.9	528.9
Hourly Pay - Excluding Overtime			
Full-Time Workers	22.94	18.21	14.88
Male Full-Time Workers	25.50	19.03	15.44
Female Full-Time Workers	21.16	17.51	13.99

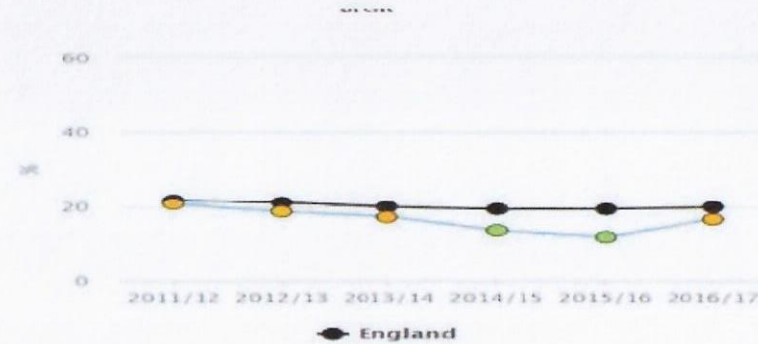
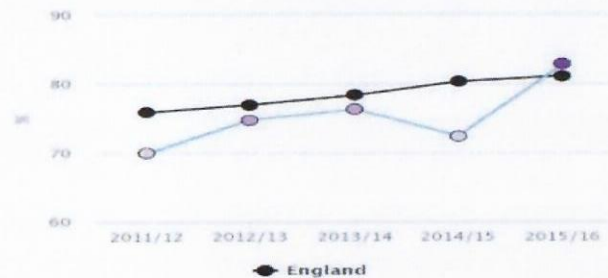
Source: ONS annual survey of hours and earnings - resident analysis

Notes: Median earnings in pounds for employees living in the area.

Brent's Mental Wellbeing

Mental distress: How is Brent feeling?

Self-reported well-being - high satisfaction score: % of respondents - Brent



Self-reported well-being - high happiness score: % of respondents - Brent



Source: Public Health Outcomes Framework: Fingertips (2017)

As indicated in the graphs above, self-reported satisfaction and happiness has improved over the past few years.

5.3% are diagnosed with depression, which means that Brent has the lowest rate of depression in the UK out of 150 counties and unitary authorities. However, an estimated 16% of the adult population has a common mental health disorder this is slightly higher than the national comparison of 15.1%



**METROPOLITAN
POLICE**

Working together for a safer London

TERRITORIAL POLICING

The Licensing Authority

*Brent Civic Centre
Engineers Way
Wembley
Middlesex
HA9 0FJ*

Your ref: 18986

Our ref: 01QK/180/20/3302

Brent Borough Licensing Department

*Harrow Police Station
74, Northolt Road
Harrow
Middlesex
HA2 0DN*

Tel: 020 8733 4195

Email: Paul.Scott9 @met.police.uk

Web: www.met.police.uk

Date: 29th May 2020

Police Representation to the application for a Premises Licence for an Adult Gaming Centre, (Future Leisure Ltd), 141, Kilburn High Road, NW6 7HT

I certify that I have considered the application shown above and **I wish to make representations** that the likely effect of the grant of the application is detrimental to the Gambling Act 2005 licensing objectives for the reasons indicated below:

Officer: Paul Scott

Licensing Constable: PC 3302NW

An officer of the Metropolitan Police, in whose area the premises are situated and who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Gambling Act 2005.

The application has been made for a premises licence.

Brent Police are making **representations** to this application in accordance with Section 1 of the Gambling Act 2005 licensing 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.**
- c) Protecting children and other vulnerable persons from being harmed or exploited by gambling.**

Police are very familiar with the area and the number of street drinkers consistently heavily under the influence of alcohol.

Police understand that the problems in the area are not enough to object to this application but strongly believe that these conditions would assist in upholding the licensing objectives.

The conditions that Police require to be added to the Premises Licence are listed below:

CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition and recordings shall be kept for 31 days and shall be made available to police and licensing officers if requested.

A CCTV camera shall be installed to cover

- a) All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions
- b) The areas of the premises to which the public have access (excluding toilets)
- c) Gaming machines and the counter area

An overt CCTV monitor to be installed, able to be seen by customers

CCTV shall be made available for the police viewing at any time with minimum delays when requested.

The following crime prevention measures shall be implemented:

- A time delay safe with deposit slot and anti-fishing mechanisms must be used at the counter till area
- Regular robbery awareness and cash handling training shall be given to all staff.

The Licensee shall maintain a bound and paginated 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.

Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.

Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.

A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.

A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable from the ground floor cashier counter by staff.

All doors and windows shall remain closed during any licensable activity.

There shall be no pre-planned single staffing/lone working at any time.

There will be a minimum of **two** staff present at all times when the premises are open.

The licensee shall ensure that all seating within the premises are either secured to the floor or are weighted to prevent lifting.

A suitable intruder alarm complete with panic button shall be fitted and maintained.

A fire alarm and smoke detection system shall be installed.

The licensee will ensure that customer toilets are checked every hour for evidence of drug taking and alcohol consumption. Toilet checks are to be documents stating the time and member of staff who made the checks.

Toilet doors remain locked, fitted with a magnetic style-locking device and access given by staff only.

An incident log shall be maintained and made available on request to an authorised Local Authority officer or the Police, which will record the following:

- a) All crimes reported to the venue.
- b) Any complaints or incidents regarding crime and disorder.
- c) Refusals and banned customers.
- d) Any faults in the CCTV system.
- e) Any visit by a relevant authority or emergency service.

Yours Sincerely

Paul Scott PC 3302NW
Metropolitan Police (Brent) Licensing Constable
nwmailbox.licensingbrent@met.police.uk

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From: Paul.Scott9@met.police.uk <Paul.Scott9@met.police.uk>
Sent: 29 May 2020 14:44
To: andrew@woodswhur.co.uk
Cc: Business Licence <business.licence@brent.gov.uk>; Legister, Linda <Linda.Legister@brent.gov.uk>; Esther, Chan <Esther.Chan@brent.gov.uk>
Subject: RE: Future Leisure Limited - AGC, 141, Kilburn High Road, NW6 7HT - 18986

Hi Andy,

Thank you for your prompt reply.

Police can confirm that they have now **withdrawn** their representations.

Kind regards,

Paul

Paul Scott | Police Constable 3302NW | North West BCU – Licensing Officer - Brent | Partnership & Prevention Hub

From: Andrew Woods
Sent: 29 May 2020 13:11
To: Scott Paul - NW-CU ; Andrew Woods
Cc: business.licence@brent.gov.uk; Linda.Legister@brent.gov.uk; Esther.Chan@brent.gov.uk
Subject: RE: Future Leisure Limited - AGC, 141, Kilburn High Road, NW6 7HT - 18986

Hi Paul

Pleased to say all conditions are agreed - thanks for getting in touch. Does that mean you can now withdraw?

Regards
Andy

Andrew Woods

Woods Whur 2014 Ltd

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Andrew Woods
Woods Whur 2014 Limited
St James House
28 Park Place
Leeds
LS1 2SP

27th May 2020

Ref: 18986

Dear Andrew Woods,

Re: Gambling Act 2005 - Licensing Representation to the Application for an Adult Gaming Centre at Future Leisure Ltd, 141 Kilburn High Road, NW6 7HT

I certify that I have considered the above application and I wish to make representations that the likely effect of the grant of the application is detrimental to the Licensing Objectives for the reasons indicated below.

Officer: Esther Chan – Licensing Inspector

An officer of the Licensing Authority, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Gambling Act 2005

The Licensing Authority representations are primarily concerned with the three licensing objectives;

- **Preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime**
- **Ensuring that gambling is conducted in a fair and open way**
- **Protecting children and other vulnerable persons from being harmed or exploited by gambling.**

As a result of the premises licence application being received by Brent Council for an **Adult Gaming Centre (AGC)**, the licensing authority have examined the area of where the AGC will be sited. Kilburn High Road is a busy large shopping parade, which runs along the border of Brent and Camden. Kilburn High Road is predominately in an area of medium levels of deprivation apart from South Kilburn Estate,

which has high levels of deprivation. Kilburn High Road is a hotspot for alcohol flagged calls to the Police for crime and anti-social behaviour, and to the ambulance service for call outs.

With the above taken into consideration, Licensing Authority wish to propose the following conditions :

CCTV

1. A comprehensive CCTV system shall be installed and maintained on the premises as required by the Metropolitan Police Licensing Team. CCTV should cover the following:
 - a) All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions
 - b) The areas of the premises to which the public have access (excluding toilets)
 - c) Gaming machines and the counter area
2. The CCTV shall continue to record activities 24 hour a day for 31 days.
3. CCTV shall be made available for the police viewing at any time with minimum delays when requested.
4. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.
5. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering exiting the premises.

Children and Young People

6. The Licensee shall maintain a bound and paginated 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.
7. Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.
8. Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.
9. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.

Staffing levels

10. There shall be no pre-planned single staffing at any time.
11. There will be a minimum of **2** staff present at all times when the premises is open.

Identification of Offenders or Problem Persons

12. The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.
13. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.

Seating

14. The licensee shall ensure that all seating within the premises are either secured to the floor or are weighted to prevent lifting.

Alarms

15. The licensee shall install and maintain an intruder alarm on the premises.
16. The premises shall install and maintain a panic button behind the cashiers counter.

Toilets

17. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documents stating the time and member of staff who made the checks.

Signage, Promotional Material and Notices

18. Prominent GamCare documentation will be displayed at the premises.

Staff Training

19. The licensee shall provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme. periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives.
20. The Licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in this training shall be formally recorded and the records produced to the police or licensing authority upon request.
21. New and seasonal staff must attend induction training and receive refresher training every six months. Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.

Homeless and Street Drinking

22. The Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.
23. The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.

Recording of Incidents and Visits

24. An incident log shall be kept for the premises and made available on request to an authorised officer of the Council or the Police which will record the following;

- a) All crimes reported to the venue;
- b) Any complaints received regarding crime and disorder;
- c) Any incidents of disorder;
- d) Any faults in the CCTV system; and
- e) Any visit by a relevant authority or emergency service.

In order for the Licensing Authority to withdraw this representation, it will be necessary for you to confirm in writing that your client is willing to accept the above conditions.

Yours sincerely,



Esther Chan
Licensing Inspector
Regulatory Services

From: Esther, Chan <Esther.Chan@brent.gov.uk>
Sent: 27 May 2020 14:02
To: Andrew Woods <andrew@woodswhur.co.uk>
Cc: Business Licence <business.licence@brent.gov.uk>; Legister, Linda <Linda.Legister@brent.gov.uk>
Subject: RE: CONSULT: New AGC - 141 Kilburn High Road, NW6 7HT - 18986

Dear Andy,

Thank you for your email.

I wish to withdraw my representation and have no further comments.

Kind Regards

Esther Chan
Licensing Inspector
Regulatory Services

From: Andrew Woods
Sent: 27 May 2020 13:56
To: Esther, Chan ; Andrew Woods
Cc: Business Licence ; Legister, Linda
Subject: RE: CONSULT: New AGC - 141 Kilburn High Road, NW6 7HT - 18986

Hi Esther

I am happy to confirm that all conditions proposed by you are agreed. Will you now withdraw your rep?

Regards
Andy

Andrew Woods

Woods Whur 2014 Ltd

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From: Abdi, Councillor Abdirazak <Cllr.Abdirazak.Abdi@brent.gov.uk>
Sent: 07 June 2020 19:36
To: Business Licence <business.licence@brent.gov.uk>
Cc:
Subject: Objection to License for 141 Kilburn High Road, NW6 7HT - 18986

Dear Business Licensing,

I would like to object to the application for a gambling license at the above address. I would like to object in my capacity as one of the locally elected Councillors for Kilburn and as a local resident that lives near the address for the proposed business.

My grounds of objection are around those permitted by the Gambling Act:

- Preventing gambling from being a source of crime or disorder and
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

From my experience of the cluster of betting shops and gaming centres on KilburnHigh Road. The gambling establishments have been at the centre of ASB and of other disturbances some of which are reported to the police and are therefore recorded.


Some of the existing betting establishments locally have been used as a focal point for gangs of youth and some of whom are exploited to distribute and sell drugs.

My concern is for these underage and vulnerable members of the community that could be exploited by criminal elements to pick up the habit of gambling and coerced to undertake further illegal activity for example by being given funds to gamble and when they become indebted being asked to pay off debts accrued by being forced to commit drug dealing.

It is well known that Kilburn is one of the poorest wards in Brent, and we have recently had a spate of muggings.

A significant contributing factor to poverty, is the number of individuals who have a gambling problem. Recent research has put the figure of problem gamblers Nationally at 500,000 individuals. It is not unheard of, for gambling addicts to commit crime in order to fund their addiction. Given the high incidents of mugging and crime on KilburnHigh Road, a further gambling establishment will undoubtedly attract gamblers some of who are addicted to gambling and are vulnerable for other reasons and this can lead them either to be perpetrators, or victims of crime.

Kind Regards
Abdi

Cllr A Abdi
Kilburn, Brent


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From:

Sent: 13 May 2020 10:51

To: Business Licence <business.licence@brent.gov.uk>

Subject: Objection to Application for Premises License - 141 Kilburn High Road

Dear Sir,

I'm writing to object to the application for a premises license on 141 Kilburn High Road, corner of Glengall Road, where there was a William Hill gambling shop, and now has been converted into two empty premises.

As a nearby resident (living on [REDACTED]), I would like to object under a number of reasons:

1. There is already a large number of gambling/betting shops, alongside coin/arcade shops up and down Kilburn High Road. There is absolutely no need for another one, fueling the rise of gambling addiction and preying on the most vulnerable in our society. Under your own draft 19-22 Statement of Gambling Principles* for Brent you state: *"An estimate provided by the Campaign for Fairer Gambling suggests that £96,334,680 was spent in the borough's B2 machines in 2016/17. The cost to society (i.e. the excess fiscal costs caused by people who are problem gamblers beyond that are normally incurred otherwise by members of the public) are felt through health, housing and homelessness, unemployment and imprisonment. Using the 2012 Health Survey for England as a basis the total excess costs in Brent exceed £2 million."* That £2M would be better spent on improving impoverished areas of Brent including parts of Kilburn High Road which have faced years of neglect, protecting our most vulnerable residents, let alone helping to eliminate the non-financial impacts you yourself call out above.
2. Gambling shops attract people that are more likely to be involved in anti-social behaviour, and with this shop just next to Glengall Passage which is out of the view of Kilburn High Road, it has always drawn characters that have historically caused trouble. Whilst this sounds like anecdotal evidence, a quick search on [Data.Police.UK](https://data.police.uk) for March 2020 alone AFTER William Hill was closed and the shop was empty shows 17 counts of Anti-Social behaviour, violence and sexual offences and others near or on Glengall Passage. This is compared to 5 crimes reported on the whole of Kilburn High Road. So in 1 month alone, when William Hill was closed, there were more than 3x the crimes reported on/near Glengall Passage than there were on the whole of Kilburn High Road. This is a reason by itself not to grant them a licence. If you compare this to data from prior months in 2019 when the William Hill store was open, you will see there were more reports of crimes/antisocial behaviour on/near Glengall Passage for example, 21 counts of crimes reported in July 2019*

In summary - there are already a number of betting shops on Kilburn High Road, in order to improve the high road, we do not need another one. This would be a real result for Brent to show actions rather than words when it comes to tackling the problem of gambling addiction and the resulting health impact on our most vulnerable residents, not to mention a continued drive to tackle crime and anti-social behaviour. An approval of this licence would show that those two things are just not a priority for Brent.

Many thanks,

* Sources:

<https://www.brent.gov.uk/media/16411049/statement-of-principles-for-gambling-draft-for-consultation-050718.pdf>

<https://www.kilburntimes.co.uk/news/environment/gamblers-have-spent-620m-in-betting-shops-across-brent-1-3834742>

<https://data.police.uk/>

From:

Sent: 13 May 2020 14:45

To: Business Licence <business.licence@brent.gov.uk>

Subject: Objection to adult gaming license 141 Kilburn High Rd

Dear Sir / Madam

I would like to raise an objection to the application of a gambling license at 141 Kilburn High Road.

I have lived on [REDACTED] since 2001 and in this time there have been numerous betting shops occupying this site. Without exception, all of the previous incarnations have acted as a beacon for anti-social behaviour. It has been common to see grievances between gamblers being aired in the street and fights breaking out in the alleyway (Glengall Passage) immediately behind the shop. Street drinking and the resultant open urination has rendered the immediate vicinity an intimidating and unhygienic place. The respite afforded by the closure of the last venue has allowed this end of Glengall Road to return to being a safe and normal residential street again.

Other points to consider :

- Although the shop front is on Kilburn High Rd, the entrances have always been on Glengall Road which is a residential street. Is the intended new entrance on Glengall or Kilburn High Rd?
- In light of the inevitable financial hardships that the upcoming recession will bring, what possible benefit could a betting shop bring to the vulnerable people who struggle with finances and gambling in this area?
- Have the new applicants considered the public health requirements that will need to be enforced for suppression of Covid-19? Social distancing / regular cleaning of gambling machines and surfaces.
- Have the council considered the proximity of other gambling establishments in the area of which there are many?

Yours sincerely,

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From:

Sent: 14 May 2020 10:31

To: Business Licence <business.licence@brent.gov.uk>

Subject: Objection to Adult Gaming Center

Please note my objection to an Adult Gaming Center to be located at 141 Kilburn High Rd NW6 7HT. This type of establishment brings no value to the community and there are already plenty of locations nearby for those who desire to gamble.

I am local to the area and see daily how these venues bring anti-social behavior and crime to our streets. I hope the council takes these issues seriously and considers them when debating whether to grant the license.

Kindest regards,

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From:

Sent: 16 May 2020 10:12

To: Business Licence <business.licence@brent.gov.uk>

Subject: 141 Kilburn High Road

Good morning,

I am writing because I would like to object to the giving the property at 141 Kilburn High Road an Adult Gaming Centre licence.

I live at [REDACTED]

I would like to object – because a business like this [REDACTED] would make me feel unsafe. My flatmate and I are young women in our early 20s – we both work outside of normal working hours, so most days we have to walk down Kilburn High Road late at night, or in the early hours in the morning.

On our current 10 minute walk to our flat from Kilburn Park tube station we already pass three 'Adult Gaming Centres'. There's one at 40 Kilburn High Road, one at 108 Kilburn High Road and there's a 'Cashino' at the corner of Quex Road (which is only 50 meters away from the proposed 'Adult Gaming Centre' at 141 Kilburn High Road). We also have to walk past two betting shops.

We are frequently cat-called and leered at by men hanging around outside these establishments. I have been followed home on multiple occasions. If there are any women on your team, I am sure they will understand that behaviour is endemic to establishments like this – and I do not want to feel threatened going in and out of my own home.

These fears are not unfounded. These establishments are most likely to attract men aged 45-64 and 85% of women aged 18-24 have faced sexual harassment in public spaces. I think it would be irresponsible and sexist to ignore these concerns.

Here are the sources of those statistics: <https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-participation-in-2018-behaviour-awareness-and-attitudes.pdf>
<http://www.stopstreetharassment.org/resources/statistics/statistics-academic-studies/>

There are already enough of these shops on Kilburn High Road – if someone feels they need to use one, they should be able to walk 50 meters and use the one at the corner of Quex Road.

I'm sure you will be well aware of the negative effects that gambling shops have on society. It is proven that betting shops and arcades push poor families into further poverty. There are half a million problem gamblers in the UK who have had their lives damaged by debt, depression, family breakdown and suicide. If the licence for this new 'Adult Gaming Centre' is approved – I can only assume that Brent Council also approves of its residents falling into debt, depression, family breakdown and suicide.

Please make the right decision about this unnecessary addition to Kilburn High Road. Put something in that unit that will decrease the level of poverty and improve the area: may I suggest a café, a chemist, a bakery, a deli or a community shop.

All the best,

From:

Sent: 19 May 2020 11:49

To: Business Licence <business.licence@brent.gov.uk>

Subject: 141 Kilburn High Road

Hi,

I notice an application has been made for 141 Kilburn High Road with the aim of turning it into an 'Adult Gaming Centre'.

I must admit, when I saw the application I thought it was a joke - Kilburn High Road is already littered with these type of premises and is plagued by all the social problems they bring with them. I live on [REDACTED] near two adult gaming centres, and am constantly saddened by the number of young people in and out who are very often drunk, on drugs or asking people for spare change.

Surely no sensible council would continue to inflict more of these premises on local residents or the vulnerable people who frequent them? At what point will Brent Council get a grip of Kilburn High Road and properly invest to make it an attractive place to shop and visit, rather than the tatty and intimidating street it is currently?

I strongly object to the application made for 141 Kilburn High Road and hope that the good sense of Brent Council will prevail.

Kind regards,

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From:

Sent: 25 May 2020 13:45

To: Business Licence <business.licence@brent.gov.uk>

Cc: [REDACTED] Abdi, Councillor

Abdirazak <Cllr.Abdirazak.Abdi@brent.gov.uk>

Subject: Re: 141 Kilburn High rd(ex William Hill)

Dear business.licence@brent.gov.uk

I am writing both as a private individual and as a representative of Brent Eleven Streets residents association which incorporates Glengal Road in the roads this residents association. I live in [REDACTED] the neighboring street.

I strongly object to having this betting shop here or in any other place on Kilburn High Road- Such shops are a blight in our locality .

The previous William Hill encouraged drinkers on the street and the use of Glengal alley way as a toilet . The people who gather intimidate children and women because the people who frequent them are so down on their luck they have nowhere else to go they loiter on the corner and on Glengal Road.

The people who use these shops can least afford to be gambling . The betting establishments care little to nothing about them , their families and the local people.

We have spent many hours and days and weeks battling and protesting against betting shops on both the Camden and Brent side of Kilburn High Road Does the council not hear or remember? We do not want more betting shops (in any shape or form) on Kilburn High Road - they are a blight on our area .

Does the council planning office ever listen to local residents? I and we cannot believe that you have allowed this to even get to the application stage.

We are fed up with the proliferation of betting establishments on the high road and have spoken with the council and local press many times that we do not want these in our area. We already have too many .

We want decent shops selling useful things and enhancing our local area not degrading it as betting shops do.

We do not want the misery that betting shops bring to our high road and to local people, local business and local families .

These shops prey on the most vulnerable people and their families . They bring misery to all .

It makes me miserable just knowing you have even let this business apply for a licence to operate here.

These shops bring absolutely nothing to our local area .

Please remove any possibility for this to be a betting shop in any shape or form .

Please change the licence of this property .

It is tiresome that Brent council are putting us through this all over again in such difficult times .

Please accept this email as a strong indication of local thought about how poorly we think of any council representative that thinks that Kilburn High road needs another betting shop . We do not want this .

It was our joy seeing William Hill close its doors

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From:

Sent: 26 May 2020 21:55

To: Business Licence <business.licence@brent.gov.uk>

Subject: Re: 141 Kilburn High Road, London NW6 7HT - Objection to Adult gaming licence

Dear Brent Licence Team

I object to the application for an adult gaming licence for the property located at 141 Kilburn High Road, London NW6 7HT, where the old William Hill betting shop was. One of the biggest threats to the Kilburn High Road is the opening up of payday loan shops, adult gaming centres and betting shops. Brent Council and Camden should liaise with each other to ensure there is a balance of these types of outlets and the local councillors on both councils should work together to limit the amount of these outlets. Kilburn High Road has been neglected for a long time and needs shops that have a positive contribution to the high street and not attract anti-social behaviour. Please consider this application and reject it. Thank you.

Sincerely

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From:

Sent: 27 May 2020 11:31

To: Business Licence <business.licence@brent.gov.uk>

Subject: 141 Kilburn High Road NW6 7HT - Objection to Gambling License

To who is may concern,

I live at [REDACTED] and would like to object to yet another gambling establishment in Kilburn.

We currently have 4 gambling establishments

- 1) Betfred at 127 Kilburn High Road, NW6 6JH,
- 2) Ladbrokes at 205 Kilburn High Rd, NW6 7HY,
- 3) Ladbrokes at Kilburn Bridge House, Kilburn High Rd, Kilburn, NW6 6HY, and
- 4) William Hill at 40A Kilburn High Rd, NW6 5UA

This is more than enough for the area.

There are 3 main points:

- (a) gambling can be source of crime or disorder or being associated with crime or disorder or being used to support crime;
- (b) protecting children and vulnerable persons from being harmed or exploited by gambling;
- (c) the fact that there are already 4 betting shops in the area.

We used to find discarded bottles of booze or cans of lager discarded nearby when there was a William Hill at the junction of Kilburn High Road and Glengall Road.

Lets get real shops for real people open instead.

Kind regards

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From:

Sent: 07 June 2020 17:21

To: Business Licence <business.licence@brent.gov.uk>

Subject: Re: 141 Kilburn High Road NW6 7HT - Objection to Gambling License

Dear Sirs,

I have lived in the area since 2007 and in [REDACTED] since 2008 and have a few objections to the proposed new betting shop.

They are as follows:

(a) Gambling can be associated with, support and/or be a source of crime and disorder.

We have clear and unquestionable evidence of this point as there was a William Hill's betting shop in the same spot where the new shop would be located. The William Hill's shop only closed very recently. The store's customers remained in the corner for hours, alternating between gambling inside the store and drinking on the curb opposite to the store. The wine/alcohol bottles, cans, urine, vomit and occasionally even faeces were noticeable, especially early on Saturdays and Sundays.

Moreover, these same customers have engaged in fights and the police have been called many times, often needing to remain parked there to avoid more trouble. The customers of this previous shop were also a source of disturbance to pedestrians, who tried to avoid them, and increased the feeling of insecurity in the area.

(b) Protecting children and vulnerable persons from being harmed or exploited by gambling.

There are 3 primary schools and 1 nursery in near proximity to the proposed new betting shop. This means that children and parents are exposed to the behaviours described above on a daily basis.

These shops also normally advertise substantial prizes and can influence children to think gambling is a potential source of revenue. It does not show the reality that the odds are in favour of the "house", a fact which is apparent in the profitability of these businesses.

(c) Even with the closure of the previously mentioned William Hill, there are currently 7 gambling establishments in our area.

While it is understandable that some people like to gamble and need a regulated facility to do this, there are more than enough places to do this in the area. I believe that all those below are more than enough to cover the demand for gambling in the area.

The 7 establishments are:

- 1) Cashino at 130 Kilburn High Rd, Kilburn, London NW6 4JD
- 2) Palace Amusements at 108 Kilburn High Rd NW6 4HY
- 3) City Slots, 89 Kilburn High Rd, London NW6 6JE
- 4) Betfred at 127 Kilburn High Road, NW6 6JH,
- 5) Ladbrokes at 205 Kilburn High Rd, NW6 7HY,
- 6) Ladbrokes at Kilburn Bridge House, Kilburn High Rd, Kilburn, NW6 6HY, and
- 7) William Hill at 40A Kilburn High Rd, NW6 5UA

I hope you reconsider the licence. The closure of that William Hill shop in the corner improved life in the street and opening a new gambling establishment would jeopardize the quality of life in our area. Please help us make our neighbourhood a safer, cleaner, and better place to live.

Kind regards

From: Sent: 27 May 2020 12:06
To: Business Licence <business.licence@brent.gov.uk>
Subject: Glengall Road, Application

I wish to object to the licence applied for at the premises at the corner of Glengall Road and Kilburn High Road. This is a residential area and a bookmakers/gaming room will attract undesirables, street drinkers etc. We have suffered for years of anti social behaviour, urinating on the street and various criminal acts when it was a William Hill . I fear this will only be a return to this.

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From:

Sent: 05 June 2020 19:45

To: Business Licence <business.licence@brent.gov.uk>

Cc:

Subject: Objection to Gambling Shop - Kilburn High Road with Glengall Road

Dear Sirs,

It is with great concern that I write to you to strongly object to the opening of a gambling shop/facility in the corner of Glengall Road and Kilburn high road.

I have lived in [REDACTED] for almost 7 years now and my objection is based in the points below:

(a) gambling can be source of crime or disorder or being associated with crime or disorder or being used to support crime. We have clear and unquestionable evidence of this point as there was a William Hill store in the same corner until very recently. The store's customers remained in the corner for hours alternating between gambling inside the store and drinking on the sidewalk opposite to the store. The wine/alcohol bottles, cans, urine (and even vomit and fecal traces too!) were noticable the next mornings, specially early on Saturday and Sunday.

Moreover these same customers have engaged in fights (police has been called many times and in some cases the police car needs to remain parked there to avoid more trouble), disturbing pedestrians that have to walk around them to avoid them. The fact that there are 3 primary schools and 1 nursery in the near proximity expose children and young parents on a daily basis to this anti-social behaviour.

(b) protecting children and vulnerable persons from being harmed or exploited by gambling. The fact that there are several schools around this location and the fact that the exterior of these shops are normally advertising substantial prizes can influence young children to think gambling is a potential source of revenues. It does not show the reality that the odds are in favour of the "house". (Just check the profitability of these businesses to know that this is the case).

(c) the fact that there are already 4 betting shops in the area.

I acknowledge that there people who like to gamble and they may need a regulated facility to do this. But there are already enough places to do that in the area. In fact there is one "Cashino" shop already across the street on Kilburn High Road and 3 more sport bet shops 5 minutes walk from this location. I believe that all those are more than enough to cover the demand for gambling in the area.

I hope you reconsider the licence and help us to make our neighbourhood a safer and a better place to live.

Thanks in advance and look forward to hear from you.

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From:

Sent: 07 June 2020 10:56

To: Business Licence <business.licence@brent.gov.uk>

Subject: Opposition to 141 Kilburn Road- gambling licence

Dear Madam, Sir,

It is with great concern that I write to you to strongly object to the opening of a gambling shop/facility in the corner of Glengall Road and Kilburn high road.

I have lived in [REDACTED] for almost 4 years now and my objection is based in the points below:

(a) gambling can be source of crime or disorder or being associated with crime or disorder or being used to support crime. We have clear and unquestionable evidence of this point as there was a William Hill store in the same corner until very recently. The store's customers remained in the corner for hours alternating between gambling inside the store and drinking on the sidewalk opposite to the store. The wine/alcohol bottles, cans, urine (and even vomit and fecal traces too!) were noticable the next mornings, specially early on Saturday and Sunday.

Moreover these same customers have engaged in fights (police has been called many times and in some cases the police car needs to remain parked there to avoid more trouble), disturbing pedestrians that have to walk around them to avoid them.

The fact that there are 3 primary schools and 1 nursery in the near proximity expose children and young parents on a daily basis to this anti-social behaviour.

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

The fact that there are several schools around this location and the fact that the exterior of these shops are normally advertising substantial prizes can influence young children to think gambling is a potential source of revenues. It does not show the reality that the odds are in favour of the "house". (Just check the profitability of these businesses to know that this is the case).

(c) the fact that there are already 4 betting shops in the area.

I acknowledge that there people who like to gamble and they may need a regulated facility to do this. But there are already enough places to do that in the area. In fact there is one "Cashino" shop already across the street on Kilburn High Road and 3 more sport bet shops 5 minutes walk from this location. I believe that all those are more than enough to cover the demand for gambling in the area.

I hope you reconsider the licence and help us to make our neighbourhood a safer and a better place to live.

Kind regards,

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From:
Sent: 07 June 2020 14:02
To: Business Licence <business.licence@brent.gov.uk>
Subject: Objection to William Hill betting shop on Kilburn High Rd

Dear Sirs,

It is with great concern that I write to you to strongly object to the opening of a gambling shop/facility in the corner of Glengall Road and Kilburn high road.

I have lived in [REDACTED] for 5 years now and my objection is based in the points below:

(a) gambling can be source of crime or disorder or being associated with crime or disorder or being used to support crime. We have clear and unquestionable evidence of this point as there was a William Hill store in the same corner until very recently. The store's customers remained in the corner for hours alternating between gambling inside the store and drinking on the sidewalk opposite to the store. The wine/alcohol bottles, cans, urine (and even vomit and fecal traces too!) were noticable the next mornings, specially early on Saturday and Sunday.

Moreover these same customers have engaged in fights (police has been called many times and in some cases the police car needs to remain parked there to avoid more trouble), disturbing pedestrians that have to walk around them to avoid them.

The fact that there are 3 primary schools and 1 nursery in the near proximity expose children and young parents on a daily basis to this anti-social behaviour.

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

The fact that there are several schools around this location and the fact that the exterior of these shops are normally advertising substantial prizes can influence young children to think gambling is a potential source of revenues. It does not show the reality that the odds are in favour of the "house". (Just check the profitability of these businesses to know that this is the case). There are also many vulnerable people living on Glengall Rd.

(c) the fact that there are already 4 betting shops in the area.

I acknowledge that there are people who like to gamble and they may need a regulated facility to do this. But there are already enough places to do that in the area. In fact there is one "Cashino" shop already across the street on Kilburn High Road and 3 more sport bet shops 5 minutes walk from this location. I believe that all those are more than enough to cover the demand for gambling in the area.

I hope you reconsider the licence and help us to make our neighbourhood a safer and a better place to live.

Regards

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From:**Sent:** 07 June 2020 16:49**To:** Business Licence <business.licence@brent.gov.uk>**Subject:** Gambling Licence 141 Kilburn High Road

Dear Sir or Madam

I write in respect of the application for a licence at premises at 141-143 Kilburn High Road. I am a resident of [REDACTED] which joins the Kilburn High Road at the corner where these premises are located.

I object to provision of a licence for Adult Gaming Centre premises at this location. My primary concern is that it will result in an increase in street crime in the area.

It is in a prominent location on the Kilburn High Road and will draw in a number of young and vulnerable people. I note that it is located very close to Kilburn Grange School – 1 minute's walk away on Priory Park Road. I do not understand how that close proximity is compatible with the objective of "protecting children and other vulnerable persons from being harmed or exploited by gambling."

Moreover, it is also located on the corner with Glengall Road. This road, because it is connected to Willesden Lane by roads that are only accessible to foot and two-wheeled traffic has proved to be a magnet for street crime: the geography allows for criminals to evade police vehicle pursuit. It is notorious that drug-users and criminals move from the busy Kilburn High Road to the more isolated, residential streets. For this reason the Council will be aware that the Kilburn SNT supported the placement of CCTV cameras in 2019 to cover the BT phonebox on the corner of Hazelmere Road and Victoria Road, which quickly adjoins Glengall Road.

Glengall Road has seen significant street crime since late 2018. There is a particular cluster of anti-social behaviour crime at Glengall Passage right by the proposed licensed premises. I am concerned the presence of an activity notorious for addictive behaviour will exacerbate that anti-social behaviour.

I note that there has been consistent complaint about gambling premises at this location because of the effect on crime in the local area <http://democracy.brent.gov.uk/documents/s19314/Application-Resident%20Rep1.pdf>

Finally, I do not understand how the presence of another Adult Gaming Centre is necessary. There is already the "Merkur Cashino Kilburn" almost immediately opposite on the Camden side of Kilburn High Road, at the corner of Kilburn High Road and Quex Road. There would, if this license is approved, be two within less than 25 metres of each other. Inbetween them, on the opposite side of Glengall Road would be "H&T Pawnbrokers". I do not understand how a cluster of pawnbrokers and AGC can be anything but a magnet for cash based street crime, anti-social behaviour and exploitation of the vulnerable. It would appear to be contrary to the guidance published in <https://www.brent.gov.uk/media/9511196/A%20Fair%20Deal%20Betting%20Shops,%20Pay%20Day%20Loan%20Shops%20and%20Pawnbrokers%20in%20Brent.pdf>

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From:
Sent: 07 June 2020 17:19
To: Business Licence <business.licence@brent.gov.uk>
Cc:
Subject: Objection to Kilburn High Road adult gaming centre

Hello,

I would like to object in the strongest possible terms to the proposed adult gaming centre at the corner of Kilburn Road and Glengall Road.

The area already has multiple gaming, betting and casino facilities, so to introduce another seems not only unnecessary but a basic dereliction of the Council's duty and responsibilities to its residents.

The hugely negative impact of gaming and gambling on individuals as well as the destructive influence on their families is well documented and as such this seems exploitative and ill-informed - and simply wrong.

In addition, the area nearby - including Glengall Passage - is already a magnet for daytime drinkers, a situation which this proposed gaming centre will certainly exacerbate.

I can see no merit in this proposition - and only profoundly adverse and damaging consequences for the area and the day-to-day lives of its residents.

Please feel free to call me on [REDACTED] if you wish to discuss these objections in more detail.

Yours faithfully,

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From:

Sent: 07 June 2020 17:36

To: Business Licence <business.licence@brent.gov.uk>

Subject: Objection to the gambling centre licence - 141 Kilburn High Road

My name is [REDACTED], I am a Brent resident and I am emailing today to object to the application of a gambling licence for the corner of Kilburn High Road and Glengall Road (141 Kilburn High Road).

I have lived on [REDACTED] my whole life and have experienced the effects of 141 Kilburn High Road being an adult gaming centre previously. It encouraged anti-social behaviour, street drinking, fights and groups of (predominantly men) hanging around the top of the road and ultimately created a hostile and unsafe environment. In the evening especially, I would be afraid to have to walk alone past the groups of people congregating outside to get to my house.

The time in which the building has been unoccupied I have felt so much safer on my street. It horrifies me to think that an adult gaming centre might return and bring with it all the problems that had previously been resolved.

I speak not only for myself but for other young women, friends and neighbours who have to deal with the fallout from these gambling centres. I hope that my objection is taken on board.

Sincerely,

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From:
Sent: 07 June 2020 20:07
To: Business Licence <business.licence@brent.gov.uk>
Subject: Objection to Gaming Venue on Kilburn High Road

Hello,

It has been brought to my attention that there is a plan to allow a Gaming venue on the corner of Kilburn High Road and Glengall Road. As a nearby resident I am strongly opposed to this sort of premises opening in this area. Kilburn High Road already has a high amount of anti-social behaviour and I feel this would contribute to the problem. I often don't feel safe walking in this area, even during the daytime and a gaming venue will potentially attract the wrong people to the area exacerbating the issue.

Gaming and gambling are a serious social problem and I don't feel Brent should be adding to the issue by making these venues more accessible. Consideration also needs to be made to the residents in the surrounding area who already have to contend with undesirable behaviour on a regular basis. We need to be welcoming businesses that benefit the community, not add to its problems.

Please take this as a very strong objection to allowing this to go ahead.

Yours sincerely,

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From:

Sent: 07 June 2020 20:59

To: Business Licence <business.licence@brent.gov.uk>

Subject: Opposition to 141 Kilburn High Road - Application for Adult Gaming Centre

Dear Sirs,

Please accept this email as our objection to the application for an Adult Gaming Centre at 141 Kilburn High Road (Kilburn High Road/Glengall Road) for the following reasons:

- The building borders two street and is extremely close to quiet residential housing. Glengall Road ([REDACTED] , less than 200 meters from 141 Kilburn High Road) is a residential street with extremely high apartment occupancy rate including a five story block of flats in close vicinity.
- The business will be located almost directly in front of a bus stop. Many families use the bus stop directly outside 141 Kilburn High Road to commute to and from schools in the area, meaning that children will be exposed to the business throughout the day.
- The business will be located next to a row of convenience stores which are a focal point of the local community which are used consistently throughout the day and the evening (we frequently use these to buy daily essentials). It is completely inappropriate that a business of this type be situated here.
- A business whose principle hours of business are late at night is not compatible with this location and will encourage noise and disorderly behaviour.
- For residents living on Glengall Road, there is only one access point to local amenities and recreational services, such as cinemas, shops and local restaurants. Access to all of these would mean having to walk directly outside this establishment through all hours of the day - and it is not right that they should be made to do this.
- Apart from the security risks which are associated with these types of businesses, it is well known that gambling establishments pose a high risk to vulnerable members of the community. It would be dangerous and irresponsible therefore to locate this business at 141 Kilburn High Road.
- Furthermore and related to the previous, this business will be located less than 200 yards from three major high street banks (Santander, Halifax and Lloyds Bank) placing vulnerable persons at risk of exploitation
- This business will be located away less than 200Ft from a MacDonalds, where many young people gather in the evenings
- There are a number of adult gaming centres stationed along Kilburn High Road already. This business is highly likely to increase anti-social behaviour and possible risk of crime, as already evidenced by a number of incidents of antisocial behaviour outside such establishments including fighting and aggression, loitering, urination and theft. However, it is worth stressing that due to the factors referred to above, out of all establishments of this nature located on Kilburn High Road, this would be the most poorly positioned in terms of its risk to public health and the wellbeing of the local community.

I would be grateful if you would confirm receipt on the above.

Kind Regards

From:

Sent: 07 June 2020 23:36

To: Business Licence <business.licence@brent.gov.uk>

Subject: Application for a premises licence

Dear Sir/Madam,

I am writing to make representation about a notice of application for a premises licence under the Gambling Act 2005.

This is an application by the company Future Leisure Limited for an Adult Gaming Centre Premises Licence under section 159 of the Gambling Act 2005. This relates to the premises at 141 Kilburn High Road, Kilburn, London, NW6 7HT.

I note that the application has been made to the London Borough of Brent Licensing Service (Regulatory Services), specifically 'Regeneration and Growth'. I have to say that the granting of this premises licence would do little to assist in regeneration and growth in Kilburn in particular or Brent in general. I am happy to expand on that viewpoint.

I have been a resident of [REDACTED] since 2015 and am very familiar with the business premises at 141 Kilburn High Road and its former incarnation as a branch of William Hill Bookmakers. What I witnessed was how significantly these premises contributed to the anti-social behaviour that is such a negative part of living in Kilburn.

While operating under the William Hill name, 141 Kilburn High Road attracted a constant stream of alcoholics and various other unsavoury individuals and groups. They did not congregate on the High Road but instead would gather along the Glengall Road side of the building, extending from the entrance door to the premises down to (and indeed, into) Glengall Passage.

These gatherings took place at all hours of the day and night and were characterised by swearing and shouting, public drinking, frequent physical altercations and littering. Of particular concern was the frequent public urination that came with these gatherings, due to the alcohol being consumed but with no access to public lavatories. The level of brazenness was such that I once witnessed an inebriated individual leaning with his back to the wall of number 141 and urinating almost half the width of the pavement, in full view of anyone walking past. The reaction of customers sitting outside La Diva Café echoed my own revulsion on that occasion.

A more disgusting example of this behaviour involved my children. I have [REDACTED] and who are pupils at Kilburn Grange School on Priory Park Road. Glengall Passage is the shortest route from Glengall Road through to the school but it was not feasible to use it as many of those gathering outside number 141 would urinate there. Consequently, Glengall Passage became akin to an open sewer and the smell was truly dreadful even when simply passing by and having to take the longer route round to the school via Kilburn High Road. One morning in particular, I went to walk my children down Glengall Passage and we were confronted by the sight of a drunken middle aged man, with a can of beer in one hand and his penis in the other, urinating openly against the wall barely

two feet from Glengall Road. I quickly moved my children away and was genuinely furious to have witnessed this sort of behaviour being displayed on the street that we call home.

The area outside Number 141 was also a focal point for criminal activity when it was a bookmakers, with several individuals openly exchanging drugs and money. An organised gang of Eastern European beggars has been operating on Kilburn High Road for the past year and several of their members would also congregate outside 141. They would walk further down Glengall Road asking people for money and I have witnessed them sitting outside the main door of Academy Court, the residential flats, arguing with each other.

Since the closure of William Hill at 141 Kilburn High Road and the premises remaining vacant, there have been no further gatherings on Glengall Road. I have not witnessed any further instances of public exposure or urination in the vicinity of Glengall Passage and the level of littering, primarily empty bottles and cans and cigarette ends, is now almost non-existent. Granting a premises licence for 141 Kilburn High Road would inevitably attract the same type of characters back to the area and would make Brent Council directly responsible for any anti-social behaviour that was subsequently to occur.

Kilburn High Road already has an excess of gambling establishments. These range from several outlets of William Hill, Ladbrokes and Paddy Power through to several 24 hour slot machine arcades. Therefore, the granting of a premises licence for 141 Kilburn High Road would be a regressive decision that would facilitate greater access to gambling opportunities in an area of London where many parts of the community suffers from social disadvantage and destructive addictions.

In closing, I would urge Brent Council to reject the application for 141 Kilburn High Road to become an Adult Gaming Centre Premises. Instead, number 141 could and should become a key part of the wider efforts to regenerate Kilburn. I would welcome most any other type of business taking over 141 Kilburn High Road and, for the reasons listed above (among others), I am sure my fellow residents in Glengall Road will overwhelmingly share this view.

Please confirm that this e-mail has been received. I look forward to hearing from you in due course.

Yours faithfully,

From:

Sent: 07 June 2020 23:36

To: Business Licence <business.licence@brent.gov.uk>

Subject: Objection to new gambling venue on Kilburn highroad and Glengall road

Dear Sirs,

I would like to raise my concerns and objections to the proposed opening of a new gambling premises on the corner Glengall Road and Kilburn high road. I have lived on [REDACTED] for 12 years [REDACTED] less than [REDACTED] from the proposed venue

The most obvious challenge is to do with street nuisance around the venue. The new premises proposes to occupy (all or part of) the site of a previous William Hill bookmaker. This venue was routinely associated with informal gathering of patrons, street drinking, acute drunkenness, littering and broken glass. There was frequent disorder and fighting that required police interventions as the police will no doubt corroborate. This is particular concern with the immediate proximity of a primary school - and near proximity of several other schools and nurseries.

More subtly, but perhaps more seriously - is the overwhelmingly negative impact of welcoming yet more gambling venues in Kilburn. we already have 4 bookies and 3 other fruit-machine gambling venues in the immediate vicinity on Kilburn Highroad

- Betfred at 127 Kilburn High Road, NW6 6JH,
- Ladbrokes at 205 Kilburn High Rd, NW6 7HY,
- Ladbrokes at Kilburn Bridge House, Kilburn High Rd, Kilburn, NW6 6HY
- William Hill at 40A Kilburn High Rd, NW6 5UA
- Cashino at 130 Kilburn High Rd, Kilburn, London NW6 4JD
- Palace Amusements at 108 Kilburn High Rd NW6 4HY
- City Slots, 89 Kilburn High Rd, London NW6 6JE

Like off-licenses and levels of alcohol consumption there is a clear and link between the geographical density of gambling venues and the amount of gambling. The presence of so many venues increases impulse gambling and normalises gambling for the wider community. The shops themselves serve as huge billboards that are visible to all, including children and young people, and other vulnerable people. Why else would they seek to open more shops in an area already seemingly saturated with them?

Despite the attempts at PR from the gambling industry that it is just a bit of harmless fun - the harms of gambling are well documented by numerous independent academic and NGO research and government agencies (indeed growing concerns have led to a major new inquiry into gambling related harms being launched <https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-scope>)

They are fundamentally exploitative - preying on vulnerable and economically marginalised individuals and actively locating in higher densities in areas with high populations of economically vulnerable individuals. The rising economic challenges created by the coronavirus pandemic have only served to increase such vulnerability - that such gambling venues are so effective at exploiting by holding out the fantasy prospect of an escape from

poverty that they invariably only entrench. They bring nothing positive whatsoever to the local community, only hardship and misery. There is never a good place to add yet another bookie in Kilburn, but this moment in time would be particularly negligent and irresponsible.

Almost any business would be preferable. Please respect the concern to the immediate locals residents, families, schools, and the wider community and reject this application.

respectfully

From:

Sent: 07 June 2020 13:44

To: Business Licence <business.licence@brent.gov.uk>

Subject: 141 Kilburn high road

I am writing to object to the adult gaming license which has been requested for the premise at [141 Kilburn High Road](#).

I am a resident who lives a few properties down and do not want this kind of business on our Road. We have so much anti social behaviour in and around this spot and do not need this kind of premise to be open all hours disturbing the neighbours in the area and attracting undesirable individuals.

There are already 4 of these businesses in close proximity. Please do not open anymore!

Many thanks

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From:

Sent: 07 June 2020 13:51

To: Business Licence <business.licence@brent.gov.uk>

Subject: Gaming license - 141 Kilburn high road

To whom it may concern,

As a resident living close to the property on question I am writing to object to the adult gaming license which has been requested for the premise at 141 Kilburn High Road.

When this property was a bookmakers there was a lot of anti-social behaviour, which has significantly reduced since it has been closed.

Secondly we already have many bookmakers and adult gaming shops along Kiburn high road. Another addition adds nothing of social or community value to the area - only more petty crime and anti-social behaviour.

It seems irresponsible of the council to allow so many of these businesses to open and operate in such a condense area. There are more than enough to satisfy people who visit these places already.

Regards,

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From:
Sent: 07 June 2020 15:11
To: Business Licence <business.licence@brent.gov.uk>
Subject: Adult gaming centre Kilburn High Road/Glengall Road

To whom it may concern.

I write to strongly object to the adult gaming centre proposed for the corner of Kilburn High Road/Glengall Road. As a longtime resident of (██████████) (32 years) I have watched the road go through many phases, some good, some bad. Of all the changes proposed over the years none has less merit than the gaming centre. It is a terrible idea with absolutely no advantages for residents. The introduction of CCTV cameras on the lamp posts at this junction and down Glengall Road indicate that there is already criminal behaviour which this adult gaming centre will only encourage. Please make sure this does not happen.

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From:

Sent: 07 June 2020 17:35

To: Business Licence <business.licence@brent.gov.uk>

Subject: Objection ; adult gaming centre ; corner of Glengall Road and 141 Kilburn High Road

Please record my objection to a gambling licence being granted to the premises on the corner of Kilburn High Road and Glengall Road (141).

Another adult gaming centre (and there is already one on the opposite side of the road, by the traffic lights) will add to the antisocial behaviour that we already experience daily on Kilburn High Road.

There are numerous bookmakers on the Kilburn side of the High Road and two adult gaming centres (slot machines) on the Camden side.

They exploit the vulnerable and add no value whatsoever to what is already a financially deprived area.

There is absolutely no benefit to the community in having another gambling premises on the High Road, and those that are already there contribute to the social problems and violence that we have to live with .

Another gambling centre and it's associated problems is just about the last thing that the people who live here need, and I strongly object .

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From:
Sent: 07 June 2020 18:11
To: Business Licence <business.licence@brent.gov.uk>
Subject: Adult gaming centre corner of Kilburn High Rd and Glengall Rd

Hello,

I am writing this email to strongly object to the gambling licence for the adult gaming centre on the corner of Kilburn High Road and Glengall Road.

My name is [REDACTED], I am [REDACTED] years old and have lived in Brent my whole life. Growing up here, there have previously been betting shops on the corner of Kilburn High Road and Glengall Road which attract street drinkers and antisocial behaviour. This has made it feel unsafe in the past and I would hate to feel that way again! I walk past this corner almost everyday and do not want to be made to feel at risk and uncomfortable in my own neighbourhood.

Furthermore, there are already multiple casino / betting shops on Kilburn High Rd that I don't understand why another one would be needed. Not only is it completely unnecessary, but adult gaming centres take advantage of vulnerable people and is a horrible industry to be encouraging.

I really hope you can understand and respect what a nightmare it would be for myself and the neighbouring residents if you allow this licence to be granted.

Many thanks.

Best wishes,

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From:
Sent: 07 June 2020 19:03
To: Business Licence <business.licence@brent.gov.uk>
Subject: Gambling centre Kilburn High Rd / Glengall Rd

Dear Sir / Madam,

As a resident of Kilburn for the last 20 years I would like to register my objection to the planned 24 hour gambling centre on the corner of Kilburn High Rd and Glengall Rd.

Why are you so intent on bringing our neighbourhood down? You know as well as I do that establishments like that just encourage anti social behaviour.

You are sacrificing the security of local residents in order to to reap the financial benefits.

As if we don't have enough to deal with what with funding being cut for the refurbishment of Kilburn High Rd.

Please see sense and refuse this application.

Kindest regards,

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From:

Sent: 07 June 2020 19:22

To: Business Licence <business.licence@brent.gov.uk>

Subject: Objecting to proposed Gaming Centre - Kilburn High Road and Glengall road

To whom it may concern,

I live very close to this intersection - on [REDACTED] - and we constantly deal with the effects of local anti-social behaviour and large gatherings. Whether that is general rubbish, noise or intimidating people hanging out in my doorway. I'd very much be against giving any other reason for people to loiter in my local area.

Feel free to get in touch with me for further clarification by email or phone [REDACTED].

Regards,

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From:
Sent: 07 June 2020 19:45
To: Business Licence <business.licence@brent.gov.uk>
Subject: Adult Gaminig Centre, Kilburn

Dear Sir/Madam

I am writing to express my objection to an adult gaming centre on the corner of Kilburn High Road and Glengall Rd. The area is a family area and these kind of premises are not conducive to creating a safer area and they attract anti social behaviour. Not something Kilburn deserves.

I trust you will reject the licence application.

Sincerely

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From:

Sent: 07 June 2020 20:54

To: Business Licence <business.licence@brent.gov.uk>

Subject: Objection to the Gaming Centre on the corner of Glengall Road - Kilburn NW6

Dear sir/madam,

I am writing to express my objection to the opening/operation of the new gaming centre (Slot machine casino) in Kilburn.

Kilburn has had its fair share of gambling/betting shops in the area for many years now and I do not believe that we need anymore. These type of businesses bring disruption, anti-social behaviour and crime to the neighbourhood. Currently there are at least three betting/casino shops in Kilburn High road, and no need for anymore.

The kids cannot play out because of anti-social behaviour and the fact that Kilburn is plaque by drug dealing and drunkards. With limited to zero policing in the area I believe the approval should not be granted. This will be harmful to the community here in Kilburn.

I hope my appeal will be considered to support those of us who live in the area and have to deal with the aftermath.

I look forward to hearing from you soon.

Kind regards

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From:

Sent: 07 June 2020 21:36

To: Business Licence <business.licence@brent.gov.uk>

Subject: Proposed adult gaming centre corner of Kilburn High Rd and Glengall Rd

Dear Sir/Madam

I object to there being a gaming centre at this location or anywhere on Kilburn High Road. It will only add to the problems and anti-social behaviour on Kilburn High Road and will cause additional noise, people and anti-social behaviour for residents in Glengall Road and nearby residential streets.

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From:

Sent: 07 June 2020 21:46

To: Business Licence <business.licence@brent.gov.uk>

Subject: Gaming centre, corner of Kilburn High Rd/Glengall Road.

Dear Brent Council

I should like to object in the strongest possible terms to the proposal for an adult gaming centre at the corner of Kilburn High Road and Glengall Road NW6. I live nearby and for years when the premises was a bookmaker's we had nothing but trouble from drunkenness, littering and antisocial behaviour. We have no desire to see a return to that. Also, there are too many bookmakers and gaming premises on the High Road already. This particular location is very close to a primary school.

Yours faithfully

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From:

Sent: 07 June 2020 21:49

To: Business Licence <business.licence@brent.gov.uk>

Subject: Gaming house in Glengal RD.

Please do not grant a licence to the newly proposed adult gaming business on the corner of Glengal Rd and Kilburn High RD.

They impoverish already poor people and create an anti social nuisance in the area. I live nearby and do not want another business like this in my road.

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From: Sent: 09 June 2020 18:21
To: Business Licence <business.licence@brent.gov.uk>
Subject: Re: Objection

I object to the drug dealing, insecure and threatening environment that has occurred in this spot with other businesses of similar type. These businesses significantly impoverish an already impoverished area, and do NOTHING to create an aspiring and comfortable environment.
Thank you.

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From:
Sent: 07 June 2020 21:55
To: Business Licence <business.licence@brent.gov.uk>
Subject: Objection

Hello

I am a Kilburn resident and I want to object to the new gaming centre proposed at the corner of glengall road and the high road.

There are already a number of gaming centres along this road which attract anti social behaviour and prey on the vulnerable (of which there are many) of our neighbourhood. The last thing Kilburn needs is more of these types of places.

Sincerely

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From:

Sent: 07 June 2020 22:22

To: Business Licence <business.licence@brent.gov.uk>

Subject: Objection to adult gaming centre

Hello

This email is to object to the adult gaming centre on the corner of Kilburn High Road and Glengall Road. I regularly shop in this area and feel part of the Kilburn community, and i think this centre will be harmful on the community, especially the more vulnerable as its them who are more prone to fall into debt and have their lives destroyed by the dependency that these centres cause. I personally have friends recovering from gaming problems and do not wish to see more of these centres affecting our communities.

Please let me know if you require any more information.

Kind regards

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From:

Sent: 07 June 2020 22:25

To: Business Licence <business.licence@brent.gov.uk>

Subject: Opposing slot machine business Glengall Road

Hi,

As a property owner and resident of [REDACTED] NW6. I strongly oppose the casino slotting business being opened on the end of our road. I am a mother of two young children who are already exposed to so much during these difficult times. This family friendly road deserves a more appropriate shop on its corner. I really do hope you could reconsider the proposal. All we want is a safer London for our children.

With best

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From:

Sent: 07 June 2020 21:31

To: Business Licence <business.licence@brent.gov.uk>

Subject: Gaming centre

Kilburn high road/ Glengal road corner.

I strenuously object to any gaming centre opening in this High Street and any place where children and impressionable people can be persuaded to part with their money and ruin their lives.

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From:
Sent: 07 June 2020 16:12
To: Business Licence <business.licence@brent.gov.uk>
Subject: Objection to adult game shop

Hi there,

I object to the potential of opening another adult gaming shop on the Kilburn high road /
Glengall road corner

From:
Sent: 08 June 2020 13:24
To: Business Licence <business.licence@brent.gov.uk>
Subject: Re: Objection to adult game shop

I would like to object the opening of another adult gaming shop on the grounds that gambling shops in the area have become a source of crime and disorder, with fights breaking out and dodgy characters frequenting them.

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From: Nick Arron <N.Arron@popall.co.uk>

Sent: 05 June 2020 16:47

To: Business Licence <business.licence@brent.gov.uk>

Subject: Representation Future Leisure Limited, application for an AGC premises licence, 141 Kilburn High Road, London, NW6 7HT

Dear Sirs,

Future Leisure Limited, application for an AGC premises licence, 141 Kilburn High Road, London, NW6 7HT.

I am a solicitor and represent City Gaming Limited and Family Leisure Holdings Limited, which operate the businesses City Slots, 89 Kilburn High Road, London NW6 6JE and Palace Amusements, 108 Kilburn High Road, Hampstead, London NW6 4HY, i.e. near the applicant site. As such, they have business interests that might be affected by the above mentioned application and the companies are both an "interested party" pursuant to section 158 of the Gambling Act 2005. The fact that they operate the same nature of business as the applicant, does not alter this fact.

In their capacity of interested parties they wish to make the following representations.

1. Which operator is the applicant? Within the application form the applicant refers to a different operating licence number from that contained in the notice to the Responsible Authorities. As such proper notice may not have been given to the Responsible Authorities or Notice of the Application to the Licensing Authority.
2. Have notices been given to the Responsible Authorities by the applicant (as it is expressly required to do regardless of whether the Authority itself provides copies to the Responsible Authorities)?
3. I note that the applicant has confirmed that it has the right to occupy the building – i.e. a legal right. While that may be the case, it is often the case that applications are made prior to the acquisition of the site – i.e. before a right to occupy has been acquired. In such circumstances, the appropriate application could be for a provisional statement as is confirmed in the Licensing Authority's Statement of Policy. Without a right to occupy, an application for a premises licence cannot be made.
4. The address of the premises subject to the application refers to 141 Kilburn High Road yet the vacant betting shop that the application proposes to occupy, previously a William Hill, had the address of 141-143 Kilburn High Road. Which is the correct address? Indeed is a licence already in effect at the premises, preventing the Licensing Authority issuing a licence to the applicant?
5. The plans do not comply with the requirements of the Gambling Act 2005 (Premises Licences and Provisional Statements) Regulations 2007 (SI 2007/459).
 - a. it is not clear where the boundary of the actual premises lies, the plan does not show, as required, the extent of the boundary or perimeter of the premises;

- b. a description of the place from which entry is made or to which exit leads, for the exit/entry apparently down the side of the building. What road is this?
- c. It is not possible to identify the location and extent of the part of the premises in which gaming machines will be made available for use in reliance on the licence.

Please accept the above serious issues as representations in relation to the application.

I should be grateful if you would please confirm receipt of this email.

Best regards,

Nick Arron

From: Andrew Woods <andrew@woodswhur.co.uk>
Sent: 12 June 2020 08:47
To: Business Licence <business.licence@brent.gov.uk>
Cc: Andrew Woods <andrew@woodswhur.co.uk>
Subject: RE: New AGC - 141 Kilburn High Road, NW6 7HT - 18986

Hi Vanessa

Thanks for the e mail.

1. I can confirm that there was a typo on the Form A document. The Operating Licence is an 18 digit number and my office has put the correct 18 digit number on the application form which states 000-036646-N-318600-012 and has put the wrong last digit on the Form A notice states 000-036646-N-318600-011. The difference is 012 on the application and 011 on the Form A. I attach both documents. I hope its very clear from the form who the applicant is and no one can have not understood this as it states Future Leisure etc and its address . I hope with those details on the forms that no responsible authority in particular can have not been aware who the applicant actually was. As you may know we have been in correspondence with the Police (attached) and the e mails refer to Future Leisure Limited. Apologies from my end - if you would like an amended Form A please let me know.
2. My client has a contract on these premises and other premises subject to licensing and planning. I am more than happy to send it to you to see [REDACTED]
[REDACTED] There is a very confidential info in the contract which cannot go to the competition ! Would you like to see it and if so would you mind confirming that you will not disclose it , it will not become a public document and will not form part of any committee papers? Hope you understand why I have to ask.
3. The application relates to 141 Kilburn High Road and your comments are Building control are noted and understood.

Please let me know if you need further information.

Regards
Andy

Andrew Woods

Woods Whur 2014 Ltd

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From: Andrew Woods <andrew@woodswhur.co.uk>
Sent: 04 June 2020 14:50
To: Business Licence <business.licence@brent.gov.uk>; Carole Collingwood <carole@woodswhur.co.uk>
Cc: Andrew Woods <andrew@woodswhur.co.uk>
Subject: RE: AGC Application - 141 Kilburn High Road, NW6 7HT

Hi Vanessa

I can confirm that my client will ensure that all COVID 19 regulations and guidance in terms of staff , customers and cleaning will be complied with.

The entrance will be the current entrance which is on the corner. There are some double doors currently on Glengall Road and these doors will NOT be used as an exit or entrance.

Regards
Andrew

Andrew Woods

Woods Whur 2014 Ltd

From: Andrew Woods <andrew@woodswhur.co.uk>
Sent: 03 June 2020 17:45
To: Business Licence <business.licence@brent.gov.uk>; Andrew Woods <andrew@woodswhur.co.uk>; Carole Collingwood <carole@woodswhur.co.uk>
Subject: AGC Application - 141 Kilburn High Road, NW6 7HT

Dear Vanessa

I write further to our recent emails with regard to the above matter and acknowledge receipt of the representations that you have received.

It may assist if I set out a bit more information about the application and I wonder if you could forward this email to those who have made representations as I should not contact them direct without their approval.

1. The applicant is an independent operator of Adult Gaming Centres and is based in London. The applicant currently operates seven other Adult Gaming Centres with licences granted for a further 6 premises.
2. The following conditions have been agreed with the MET police and would be implemented at the premises:

1.CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition and recordings shall be kept for 31 days and shall be made available to police and licensing officers if requested.

2.A CCTV camera shall be installed to cover

- a) All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions*
- b) The areas of the premises to which the public have access (excluding toilets)*
- c) Gaming machines and the counter area*

3.An overt CCTV monitor to be installed, able to be seen by customers

4.CCTV shall be made available for the police viewing at any time with minimum delays when requested.

5.The following crime prevention measures shall be implemented:

- A time delay safe with deposit slot and anti-fishing mechanisms must be used at the counter till area
- Regular robbery awareness and cash handling training shall be given to all staff.

6.The Licensee shall maintain a bound and paginated 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.

7.Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.

8.Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.

9.A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.

10.A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable from the ground floor cashier counter by staff.

11.All doors and windows shall remain closed during any licensable activity.

12.There shall be no pre-planned single staffing/lone working at any time.

13.There will be a minimum of **two** staff present at all times when the premises are open.

14.The licensee shall ensure that all seating within the premises are either secured to the floor or are weighted to prevent lifting.

15.A suitable intruder alarm complete with panic button shall be fitted and maintained.

16.A fire alarm and smoke detection system shall be installed.

17.The licensee will ensure that customer toilets are checked every hour for evidence of drug taking and alcohol consumption. Toilet checks are to be documents stating the time and member of staff who made the checks.

18.Toilet doors remain locked, fitted with a magnetic style-locking device and access given by staff only.

19.An incident log shall be maintained and made available on request to an authorised Local Authority officer or the Police, which will record the following:

- a) All crimes reported to the venue.
- b) Any complaints or incidents regarding crime and disorder.
- c) Refusals and banned customers.

- d) Any faults in the CCTV system.*
- e) Any visit by a relevant authority or emergency service.*

- 3. The applicant has also agreed conditions with the licensing authority and these will also be implemented at the premises should the licence be granted:

CCTV

1.A comprehensive CCTV system shall be installed and maintained on the premises as required by the Metropolitan Police Licensing Team. CCTV shall cover the following:

- (a) All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions*
- (b) The areas of the premises to which the public have access (excluding toilets)*
- (c) Gaming machines and the counter area*

2. The CCTV shall continue to record activities 24 hour a day for 31 days.

3. CCTV shall be made available for the police viewing at any time with minimum delays when requested.

4. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.

5. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering and exiting the premises.

Children and Young People

6. The licensee shall maintain a bound and paginated 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.

7. Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.

8. Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the licensing authority upon request.

9. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.

Staffing Levels

10. There shall be no pre-planned single staffing at any time.

11. There will be a minimum of 2 staff at all times when the premises is open.

Identification of Offenders or Problem Persons

12. The licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.

13. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.

Seating

14. The licensee shall ensure that all seating within the premises are either secured to the floor or are weighted to prevent lifting.

Alarms

15. The licensee shall install and maintain an intruder alarm on the premises.

16. The premises shall install and maintain a panic button behind the cashiers counter.

Toilets

17. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documents stating the time and member of staff who made the checks.

Signage, Promotional Material and Notices

18. Prominent GamCare documentation will be displayed at the premises.

Staff Training

19. The licensee shall provide training on the specific local risks to the licensing objectives that have been identified for those premises as part of the staff induction training programme. Periodically provide refresher training to all its staff working at these premises on the specific local risks to the licensing objectives.

20. The licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in this training shall be formally recorded and the records produced to the police or licensing authority upon request.

21. New and seasonal staff must attend induction training and receive refresher training every six months. Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.

Homeless and Street Drinking

22. The Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.

23. The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.

Recording of Incidents and Visits

24. An incident log shall be kept for the premises and made available on request to an authorised officer of the Council or the Police which will record the following:

- (a) All crimes reported to the venue;*
- (b) Any complaints received regarding crime and disorder;*
- (c) Any incidents of disorder;*
- (d) Any faults in the CCTV system; and*
- (e) Any visit by a relevant authority or emergency services.*

4. I can also confirm that the following will be in place at the premises if the licence is granted:

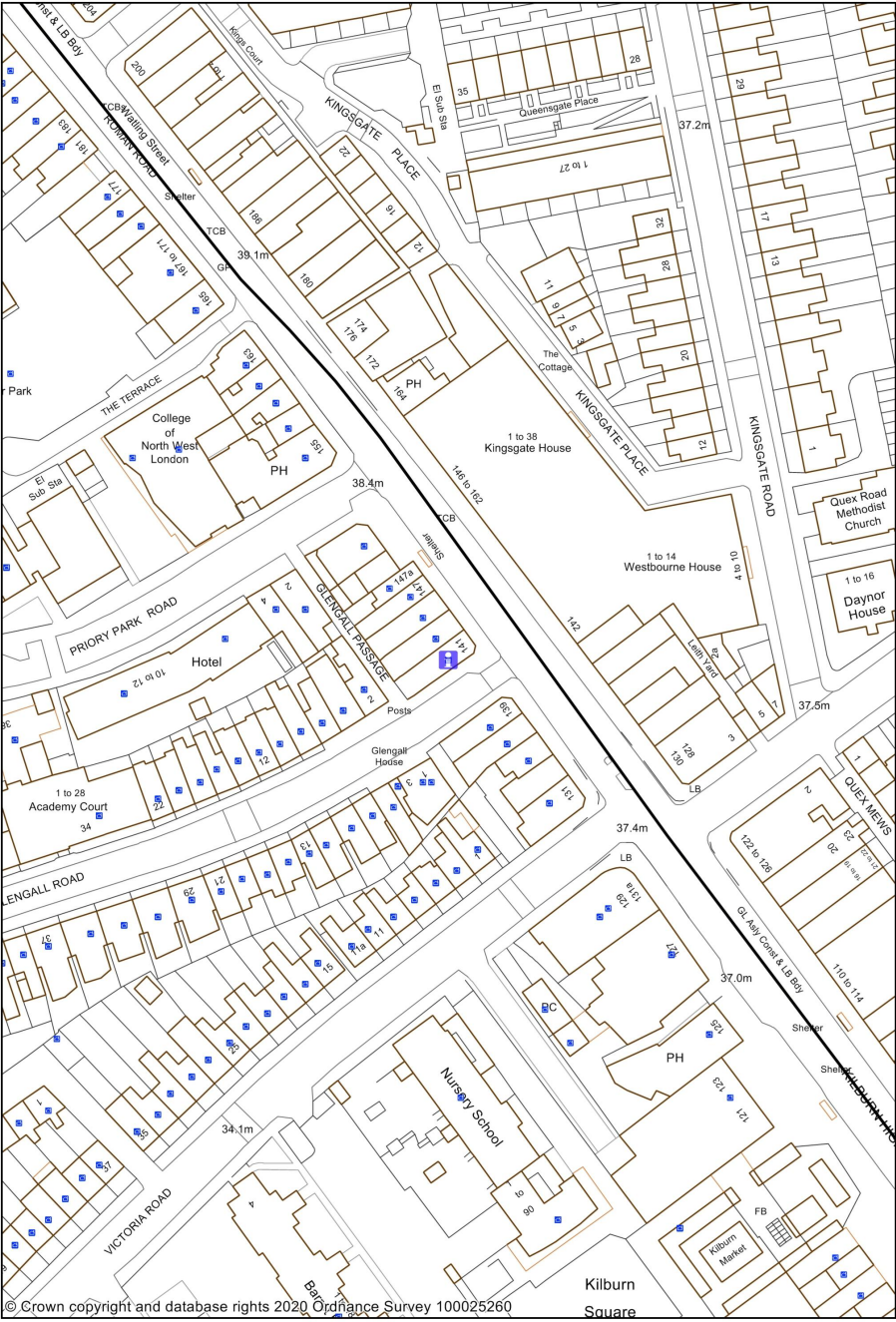
1. Clear signage on the front door prohibiting under 18s from entering the premises and anyone carrying alcohol from entering the premises.
2. There will be staff training with regard to all licensing objectives, in particular protecting the vulnerable.
3. GamCare posters will be displayed in the premises and staff will liaise with customers who will be able to self-exclude both from these premises and any other Future Leisure premises. Staff will be trained on intervention and safeguarding.
4. Anyone who does not look 25 will be asked to provide passport or driving licence identification.
5. The fact that there will be 2 members of staff on the premises at all times will ensure that there is constant supervision of customers, more than adequate security and staff availability to assist any customer who requires any help.

I am happy to confirm that all of the above will be in place at the premises and would be grateful if you would notify those who made representations.

Andrew Woods

Woods Whur 2014 Ltd

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