



Alcohol and Entertainment Licensing Sub-Committee

Tuesday 24 November 2020 at 10.00 am

This will be held as an online virtual Meeting

Details on how to access the link in order to view the meeting will be made available online via the following link: [Here](#)

Membership:

Members

Councillors:

Long (Vice-Chair)
Kennelly
Maurice

Substitute Members

Councillors:

Ahmed, Chohan, Denselow, Hector, Hylton, McLeish
and 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 attend this meeting as an online virtual meeting. The link to view the meeting will be made available via the following link: [Here](#)

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 a 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	
3 Application for an Adult Gaming Centre by Silvertime Amusements Ltd for the premises known as 5 - 6 Park Parade, Harlesden, NW10 4JH, pursuant to the provisions of the Licensing Act 2003	1 - 42

Date of the next meeting: Date Not Specified

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Gambling Act 2005

Application for an Adult Gaming Centre

1. The Application

Name of Applicant:	Silvertime Amusements Ltd
Name & Address of Premises:	5 – 6 Park Parade, Harlesden, NW10 4JH
Applicants Agent:	Roger Etchells

The application is for a Bingo Premises Licence

2. Background

The applicant holds four other gambling premises licences in the borough.

3. Relevant Representations

Representations are received from the Licensing Police, Licensing Officers and local residents.

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): _____

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]

3. Applicant's address (home or business – *[delete as appropriate]*):

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.

[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation: SILVERTIME AMUSEMENTS LTD

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence.]

7. The applicant's registered or principal address:

116 BURNT OAK BROADWAY, EDGWARE, HA8 0BB

Postcode: HA8 0BB

8(a) The number of the applicant's operating licence (as given in the operating licence):

000-002913-N-103141-004

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.

[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known): SILVERTIME

11. Address of the premises (or, if none, give a description of the premises and their location):

5-6 Park Parade, Harlesden

Postcode: NW10 4JH

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 GROUND FLOOR OF A 3 STOREY BUILDING FORMERLY OCCUPIED AS A BETTING OFFICE.

14(a) Are the premises situated in more than one licensing authority area?

No *[delete as appropriate]*

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 *[delete as appropriate]* *[Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be 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.

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon	<i>hh:mm</i>	<i>hh:mm</i>	
Tue			
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): (dd/mm/yyyy)

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 [delete as appropriate]

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 [delete as appropriate]

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

SILVERTIME, 53 HIGH STREET, HARLESDEN, LONDON, NW10 4NJ

SILVERTIME, 527 HIGH ROAD, WEMBLEY

SILVERTIME, 10 BANK BUILDINGS, HIGH STREET, HARLESDEN

Ground floor, 509 High Road, Wembley, HA0 2DH

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: ROGER ETCHELLS & COMPANY

Date: 06/10/2020 (dd/mm/yyyy) Capacity: DULY AUTHORISED AGENT

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: _____

[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 21 and 22.]

[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]

Part 8 – Contact Details

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

ROGER ETCHELLS

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

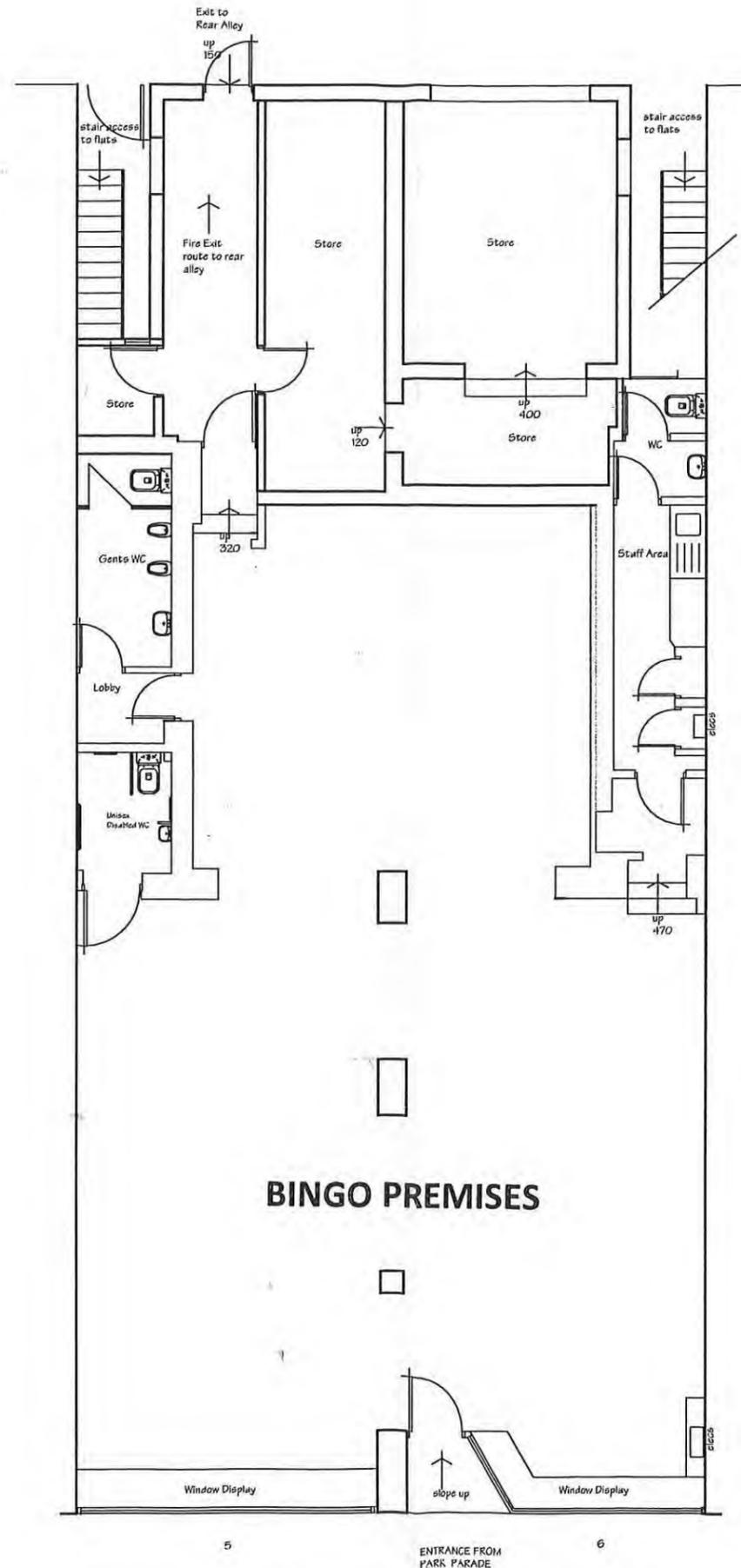
01530 417554

24. Postal address for correspondence associated with this application:

ROGER ETCHELLS, THE OLD BANK, KILWARDBY STREET, ASHBY DE LA ZOUCH

Postcode: LE65 2FR

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:



BINGO PREMISES

Scale 1:100

REV	DATE	DETAILS
CRESSWELL PROPERTY SURVEYS LIMITED CHARTERED BUILDING SURVEYORS ARCHITECTURAL & STRUCTURAL CONSULTANTS		
CLIENT	Silvertime Ltd	
SUBJECT	Proposed Ground Floor Layout 5/6 Park Parade Harlesden W10 4HT	
TITLE	Ground Floor License Drawing	
DATE	September 2020	SCALE - stated DRAWING NO - A2769/L1 REV -

Proposed Ground Floor Layout - License Plan

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Premises

Premises Name:	Silvertime
Premises Address:	5-6, Park Parade, Harlesden
Premises Post Code:	NW10 4JH
Premises Licence Number:	
Category of Premises:	Bingo with No under 18 restriction

Company

Operating Company:	Silvertime Amusements Ltd
Operating Licence Number:	000-002913-N-103141-00

Assessment Writer

Name of Person Writing this Assessment:	Phil Wheeler
Position within Company or Name of Authorised Agent:	Operations Director
Date that Original Assessment was Written	30th September 2020

Requirement to Comply

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences

Effective as at 6 April 2016

Social responsibility code provision 10.1.1

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.
2. Licensees must review (and update as necessary) their local risk assessments.
 - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c. when applying for a variation of a premises licence; and
 - d. in any case, undertake a local risk assessment when applying for a new premises licence.

Ordinary code provision 10.1.2

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

Local Area Profile

The property is located on Park Parade at the top of Harlesden High Street near the junction of Manor Park Road. The road has pedestrian pavements either side and features double yellow lines on both sides, opposite is the Royal Oak Public House.

The venue will display approximately 60 machines of categories B3, C and D, it is square in shape with a double unit frontage, the main entrance is situated on the right hand side at the front opening on to the pavement.

The local shops are mixed types typical with urban High Streets including; Bakers, Hardware Stores, Grocers and Green Grocers, Clothing and footwear shops, a Post Office and Banks, there are also numerous takeaway food outlets.

Willersden Junction Underground Station is the closest overground and tube train station and that is within 2000 meters. Buses serving the local area travelling on Park Parade include the 187, 206 and 226 and the nearest bus stop is 200 meters away from the shop front.

The venue falls under Harlesden policing neighbourhood that is provided by the Metropolitan Police Force Service.

We are aware of a number of primary and secondary schools in the town, there are also sport centres and gyms. The population is multi-cultural with a tendency for skilled and un-skilled manual labour.

The Statement of Principals published by Brent Council for 2019-2022 recognises towns in the borough with gambling venues as crime hotspots. Point 4.2.4 on page 21 emphasises the need for careful consideration on a great deal of issues regarding crime and how Silvertime control such situations.

Silvertime management are aware of this fact and act accordingly to counter-act any such situation and this is detailed below.

Gambling Act 2005 - The Licensing Objectives (LO)

The Gambling Act 2005 sets out the three licensing objectives (LO), which are:

- (A) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- (B) Ensuring that gambling is conducted in a fair and open way; and
- (C) Protecting children and other vulnerable people from being harmed or exploited by gambling.

Risk Assessment	LO	Control System	Risk Management	Review Date
Poor security leading to vulnerability to crime	(A)	Physical	<p>High Definition CCTV – Internal & External access for viewing. Recordings retained for 30days.</p> <p>Timer locked safes</p> <p>Intruder alarm</p> <p>Static and Mobile Panic button to Police with external siren.</p>	
		Design	<p>Toughened and laminated glass used for all windows.</p> <p>Entrance doors with porch allow controlled and selective admission.</p> <p>Floor layout design to maximise customer visibility by staff</p>	
		Systems	<p>Cash change machine installed to minimise need for cash handling by staff.</p> <p>Machine door opening; keys only available to management</p> <p>Log maintained for history of Police attendance recorded on data tablet</p> <p>Minimum of two uniformed staff on floor duty</p> <p>Option on external company door security guard</p>	
Awareness of increased local crime in the area.	(A)	Systems	<p>Regular inspections of websites www.met.police.co.uk/ www.streetcheck.co.uk www.crimestats.com</p> <p>Staff discussions (internal) and with neighbouring businesses</p>	

Risk Assessment	LO	Control System	Risk Management	Review Date
Failure to identify attempts to launder money on the premises (e.g. dye stained notes) and to follow correct reporting procedure.	(A)	Design	HD CCTV Internal & External monitored and recorded, data stored for 30 days accessed locally or remotely.	
		Physical	Monitoring customers behaviour by static and mobile staff	
		Systems	Fully compliant with LCCP requirements. Comply with Bacta's Policy & Procedures guidance.	
Failure to manage acts of aggression from customers	(A)	Design	HD CCTV Internal & External monitored and recorded, data stored for 30 days accessed locally or remotely. Warning Posters (Non tolerance of aggression) displayed	
		Physical	Monitoring customers behaviour by static and mobile staff Mobile and Static alarms with direct contact to Police	
		Systems	Staff trained on company policy & procedure Contact our contracted security company or police	

Failure to deal with Customers making complaints about the outcome of Gambling.	(B)	Physical	All machines purchased from licensed manufactures/suppliers Machines maintained by qualified engineer Machines turned off should a fault occur	
		Systems	Complaints procedure & forms available on premises. Regular staff training on company policy. Registered with ADR Entity – Bacta ADR Service. Compliant with Bacta Policies & Procedures Complaint captured and recorded on data tablet	
Provision of information to players on responsible gambling.	(C)	Design	Self Exclusion programme operated. Data captured recorded onto Data Hub for distribution.	
		Physical	Stay in control leaflets displayed and discretely available Posters displayed Extra displays close to ATM and toilets Gambling Helpline contact displayed	
		Systems	Adhere to Bacta Procedure & Policy monitoring customers Stock control for leaflets	
Risk Assessment	LO	Control System	Risk Management	Review Date
Failure to recognise signs associated with problem gambling or substantial changes in gambling style.	(C)	Design	Players' positions and behaviour effectively monitored by mobile and static staff	

		Systems	Staffed trained in customer interaction in line with Bacta's guidance. Policy to record interaction and level of staff that are authorised to intervene.	
		Physical	CCTV positioned at entrance to enhance ease of recognition of excluded customers Regular staff employed to help build customer relationships.	
Risk Assessment	LO	Control System	Risk Management	Review Date
Failure to properly administer and maintain the self-exclusion process.	(C)	Systems	Data regularly reviewed SE forms always available Photographic equipment available for customers wishing to self-exclude Self-Excluded customer file kept on premises on data tablet	
Age Verification	(C)	Design	Strictly No Under 18's posters displayed	
	(C)	Physical	Following the virus outbreak customers must wear a protective mask. Customers must be asked to remove mask for AV purposes before being allowed in.	
	(C)	Systems	Independent company AV testing on staff	
Awareness of schools in the local area.	(C)	Systems	Reference local education authority	

				<p>Local Schools located within 1 mile of the venue as follows;</p> <ol style="list-style-type: none"> 1) Harlesden Primary School 2) John Keble Church of England 3) Convent of Jesus and Mary College 4) Newman Catholic College 	
Risk Assessment	LO	Control System	Risk Management	Review Date	
Awareness of residential facilities for the vulnerable in the local area.	(C)	Systems	<p>There are care homes or other residential facilities for the vulnerable in the vicinity. Within 1 mile there are;</p> <ol style="list-style-type: none"> 1) Homefield Court Care Home 2) Fortune Gate 3) Tower House Residential Home 4) Franklyn Lodge <p>http://www.carehome.co.uk</p>		
Awareness of gambling care agencies in the local area.	(C)	Systems	<p>No specific facilities for problem gambling in the vicinity.</p> <p>www.gamcare.org.uk www.gordonmoody.org.uk www.gamblersanonymous.co.uk</p>		



TERRITORIAL POLICING

Brent Police Licensing Unit

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

Your ref: 19969

Our ref: 339/20/2965NW

**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: 02/11/2020

Dear Sir/Madam

Police Representation to the application for a Premises Licence for 'Silvertime Amusements Ltd, 5-6 Park Parade, Harlesden, London, NW10 4JH.'

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: Gary Norton

Licensing Constable 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 Gambling Act 2005.

The application has been made for a premises licence.

Brent Police are objecting to this application for a premises licence 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.

Gambling establishments have historically been venues of repeated calls to police due to a variety of issues: criminal damage by frustrated customers, ASB, violence/public order, drug use, congregating street drinkers, local gang activity, underage children etc. The area of Harlesden town centre already suffers greatly from crime, disorder, ASB and street drinking issues, so any new premises that could add to these issues would need to conduct their business stringently in line with the gambling licensing objectives.

Some of the Police licensing concerns are broadly covered by the application, but some others would be beneficial.

Police require the following points should be included in the operating schedule, or added as conditions on the premises licence.

- 1) A clear and unobstructed internal view from Prevention of Crime and Disorder outside the premises shall be maintained at all Gambling is conducted in a fair and open times, as shown on the licence plan.
- 2) 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.
- 3) 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.
- 4) Signs to be displayed alerting customers:
No alcohol
No smoking
No persons under 18 Years
Persons will be prosecuted for causing criminal damage
- 5) A suitable intruder alarm complete with panic button shall be fitted and maintained.
- 6) The premises shall install and maintain a panic button behind the cashiers counter.
- 7) 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.
- 8) A fire alarm and smoke detections system will be installed.
- 9) The premises shall be staffed by a minimum of two persons at all times.
- 10) The licensee shall install and maintain an intruder alarm on the premises.

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

12) 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.

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

14) 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.

Yours sincerely

PC Gary Norton 2965NW

Barnet/Brent/Harrow Licensing
NorthWest Partnership & Prevention

The boroughs of Brent, Barnet and Harrow merged into the North West Basic Command Unit in November 2018 due to corporate restructuring. The geographical area is known as NW BCU. The service you receive from us will not change, however some recognised details such as email addresses and shoulder numbers will. For more information, visit www.met.police.uk/news/met-announces-changes-to-local-policing-294044.

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

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Roger Etchells & Co
The Old Bank
Kilwardby Street
Ashby de la Zouch
Leicestershire
LE65 2FR

30th October 2020

Ref: 19969

Dear Sir/Madam

Re: Gambling Act 2005 - Licensing Representation to the Application for a New Premise Licence (Bingo) at Silvertime, 5-6 Park Parade, Harlesden, NW10 4JH

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 a Bingo premises, the Licensing Authority have examined the area. Park Parade which falls under the Kensal Rise ward, which is a busy street consisting of numerous licensed premises such as bars/clubs, pubs, off licences and late night refreshment premises. The area is surrounded by many residential dwellings. Park Parade has been

a subject of anti-social behaviour and a hotpot for crime and disorder. With the above taken into consideration, the 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.

Plan

25. A clear and unobstructed internal view from Prevention of Crime and Disorder outside the premises shall be maintained at all Gambling is conducted in a fair and open times, as shown on the licence plan.

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

Yours sincerely,



Esther Chan
Licensing Inspector
Regulatory Services

Public Representation

Rep 1 - 28-10-20

Not appropriate for Park Parade which is a residential area. Harlesden in general needs to reduce gambling shops not increase. Previous William Hill brought in anti-social behavior to the neighbourhood. We were delighted it closed. We are not happy for it to be replaced with Bingo and gambling.

Rep 2 - 29-10-20

We already have a Silvertime shop by the Jubilee clock this is enough. We do not need another one, they attract anti-social behavior which we are desperately trying to reduce . This is a poor neighbourhood and we not need anything to increase this problem which ,having more gambling in the area will do, we have too many as it is. We are struggling on Park Parade as it is with a large anti social problem, along with a huge drug issues, this will only contribute to it. Could we for once get this right, and not subject our neighbourhood and school children to this bad example of gambling which is a huge problem generally, that results in the loss of people's income and dignity just for someone else's gain. It will make no difference if it is no Under 18's at all, it is unnecessary and will only act as a example of a type of lifestyle that is harmful. Maybe it is time to start thinking of the community something like a community centre with a book shop where everyone in the area could benefit from would be more use. I TOTALLY OBJECT.

Rep 3 - 29-10-20

Whilst i would love to see the old William hill commercial opened up again to bring life back to park parade , it is with regret that i have to object to the proposed commercial being used for gambling ..! My concern is this will attract more antisocial behaviour to the road / area at a time that both businesses and residents have clearly had enough to deal with on park parade and have a continuing battle to bring the council and police together to help create a better environment for all.

Rep 4 - 29-10-20

Given the level of persistent anti social behaviour problems afflicting this neighbourhood, this is the last thing we need.

Rep 5 - 29-10-20

Please no more gaming/gambling shops on our small high street. The community really does not need any more of this kind of business which is entirely cynical because it takes money off those with the least who need it most. Such a business will not bring or encourage positive development to the neighborhood but will only burden it by attracting more gatherings of men and with that probably more petty crime. Using the premises for such a purpose is appealing to the lowest common denominator for our community and we can do better for ourselves. Please do not encourage more gambling in Harlesden.

Rep 6 - 29-10-20

In an already problematic area, with many current betting places and a documented issue with drugs, prostitution and street drinking, it would be irresponsible of Brent Council to permit yet another premises like as this one to open its doors. We, The residents, are already experiencing enough trouble and disturbances at present and strongly disagree with this application.

Rep 7 - 29-10-20

This will bring more anti social and social distancing issues to an already crowded street

Rep 8 - 29-10-20

Park Parade is an extension of Harlesden High Street which has many retails spaces devoted to shops associated with social deprivation (pawn, pubs, chicken shops and gambling) . Park Parade is a crime hot spot. This is statistically supported by the Brent Council website. We need retail spaces to be occupied by more diverse businesses. We have chronic social deprivation and crime and we need businesses that build community. Silvertime will drag Harlesden and it's families down with it. After Covid we need to support positive change in depressed neighbourhoods. Please don't let this happen to us.

Rep 9 - 29-10-20

I object on the grounds that it does not add to the cachet on Park Parade. It gravely lowers the tone of the area and will encourage anti-social behaviour.

Rep 10 - 29-10-20

We need businesses that contribute to the community not take from the community. This will add to the already high level of drunken behaviour, fighting and drug dealing that is already present in Park Parade. This is more important than ever in this time of COVID 19

Rep 11 - 29-10-20

we would like to more family orientated business's in Harlesden. These premises just create a magnet for more anti - social behaviour.

Rep 12 - 28-10-20

I wholeheartedly object to this application. Park Parade has been affected by many changes of use to local business premises over several years and it is now unrecognisable as a local shopping road for the local residents. Once this street had good shops and served us well. It has become a street known for street drugs, street drinking, anti social behaviour and any good business that do represent the local residents needs are being overshadowed by this. We are now swarming with cafe's frequently only by men, have a huge influx of non local traffic blocking the roads and illegally parking in residue only bays and high levels. There is already a gambling establishment by the Jubilee Clock tower which is moments away and we DO NOT need another gambling establishment. I honestly can't even believe this application is being considered. Another nail in the coffin for this neighbourhood if this goes through. Sorry this is utterly wrong and should be rejected.

Rep 13 - 30-10-20

We do not need another gambling premise in Harlesden, there is too much Lottering around the betting shops that we have already.

Rep 14 - 30-10-20

The last thing we need in an area that is already swamped with gambling and recreational businesses that bring anti social behaviour and crime to the neighbourhood is ANOTHER gambling shop

Rep 15 - 30-10-20

Harlesden doesn't need any more betting premises. It attracts the worst of the area and it's not a positive contribution to the local community.

Rep 16 -30-10-20

As a local community we wholeheartedly object to this premises being turned into another bingo/gambling premises. We have had numerous issues with groups and gangs hanging out at the top of Harlesden Gardens, causing much noise and disruption to the neighbourhood. To install a business that would encourage the youth to hang out here again, pointlessly, would be utterly devastating as we are doing our very best to clean up the area. This kind of establishment would doubtlessly attract antisocial behaviour. We need to diversify our neighbourhood and there are already enough of these kinds of businesses in the area, including, I believe, a Silvertime! Why do we need another??? Keep it to the High Street and away from our houses please. I encourage you to consider filling this space with a business that will uplift the area rather than bring it down like this one. Many thanks

Rep 17 - 30-10-20

Inadequate measures in application to verify customers ID: only posters offered with no physical ID verification Inadequate measures listed in application to manage acts of aggression: only posters display - CCTV cameras do not actually manage behavior, they just record it to deal with it post incident with no prevention, they are no safeguards listed in the monitoring of customers nor actions to be taken to prevent violent incidents. There are no measures listed to prevent loitering or anti-social behaviour on the pavement immediately adjacent to premises from overspill of customers. There are no measures listed to deal with waiting customers at door due to social distancing requirements inside premises. There are no measures listed to monitor pavement overspill of customers during school exit times (between 3-4pm) where pavement is highly frequented by school children leaving the Convent of Mary school with an exit immediately adjacent to premises. There is also a highly used bus stop where school children would congregate on their way home.

Rep 18 - 30-10-20

It would be extremely disappointing if Brent Council approved this planning application. A Bingo Club will only contribute to the escalating levels of socio-economic deprivation that already exist in Harlesden. The police and local residents have been working hard to tackle the ongoing problems of street drinking and drug dealing in the vicinity of Park Parade and a Bingo Club will only act as a magnet for young people and worsen antisocial behaviour in the area. Equally, allowing such an establishment to open in the evenings will not contribute to London's 24 hour economy, it will only serve to fuel drug-dealing, loitering and insecurity for local residents. Such an establishment will be contravening 'diversity of use', as already more than 3% of Harlesden town centre frontage is comprised of adult gaming centres, pawnbrokers / payday loan centres. In summary, approval of this application would be a gross distortion of Development Management Policy DM3 - 'Maintaining and enhancing the vitality of the shopping centre'. On what grounds does a Bingo Club enhance the vitality of Park Parade? It offers no intrinsic social benefit or value for the Harlesden community whatsoever.

Rep 19 - 30-10-20

Even longer opening times than currently, already a problem on this street and surrounding streets with street drinking, prostitution, noise and anti social behaviour.

Rep 20 - 30-10-20

I object on the grounds that the premises potentially being open until midnight will increase gambling and general anti social behaviour in the neighbourhood. This is the last thing Harlesden needs.

Rep 21 - 30-10-20

I object on the grounds that this venue will potentially be open until midnight which will increase net gambling in the area. Empty shops are better than this.

Rep 22 - 30-10-20

I feel Park parade would be horrendous to have a gambling establishment opened again. When the previous shop was there there was issues with people hanging around drinking on the street . Park Parade is an area with a huge drug dealing issue with gangs hanging around often linked the the cafes in the area . I feel with groups hanging around gambling shops this would increase. It is an area that feels very unsafe at the moment with street gangs, drinking and drug dealing . There is a huge issue with cars parking on yellow lines blocking traffic and I feel this would also increase . The whole area needs to be dealt with before opening yet another potential issue . The street feels lawless and aggressive at the moment and I'm scared of walking in that area another betting shop would increase the issue .

Rep 23 - 30-10-20

This is a very bad idea and these proposals should be rejected. - There are many gambling shops in Harlesden already and with ASB, drinking or drug issues in the near vicinity. - The proposed gambling centre is very near to a school (and near where school children queue for the bus, so they will be passing these premises.) - I think it is a bad idea to site a gambling business so close to two cut-price off-licences. Park Parade is turning into a street full of licenced premises of one kind or another, and it would be nice to have more variety to what the area has to offer.

Rep 24 - 30-10-20

We do not need a gaming venue in the area. I'mExtremely opposed to this as it encourages debt. There are enough gambling / gaming venues in the area already.

Rep 25 - 30-10-20

I object for the following reasons: 41.2 3. Claim it will maintain or enhance the vitality of the shopping centre. An Adult Gaming Centre will not do this. In fact it does the opposite. It sucks the life out of shopping district by occupying a valuable store front, which could be used by an actual shop front, cafe, restaurant or any other service that provides any single positive benefit for the community. It drains money away from local residents so they have less money to spend in the rest of the shopping centre. 6.14 'According to my research number of AGC, pawn broker or loanshops has not decreased since 2013'. This is not correct. Since moving to Harlesden in 2015, I have seen at least four pawnbrokers and loan shops opening in Harlesden pushing the number up over the allowed 3% level. Another AGC in the area replacing a betting shop will do nothing to reduce this percentage or diversify the shopping centre of Harlesden, especially since their is another AGC a single block away from this proposed one. 8.4 The proposal would maintain and enhance the vitality of the shopping centre. An AGC will not do this. It does the opposite. It sucks the life out of the shopping district by occupying a valuable store front, which could be used by an actual shop, cafe or restaurant. It drains money away from local residents so they have less money to to spend in the rest of the shopping centre. CONCLUSION 7.1 - The introduction of a VITAL and BUSY use. An AGC is neither vital nor busy. An AGC is not VITAL in any way. In fact, it is the opposite. It provides nothing positive to the area; - It exacerbates anti social behaviour at night, which Park Parade already has a serious problem with. - It drains away money from vulnerable local residents the majority of who are struggling monetarily and are of low socio economic class, leaving less money to circulate in shops and businesses that provide some wider community and social benefits. - It's not BUSY - the footfall going into the AGC by the Jubilee Clock is far less than betting shop would have. There is no reason to think this proposed one would not be the same. What an AGC does is to purely occupy a valuable shop front attracting fewer customers, which could otherwise be occupied by a shop or other service that provides are far greater and wider social and community benefit.

Rep 26 - 30-10-20

I very strongly am against the idea of a gaming casino to replace the William hill site. There is already a gaming casino by jubilee clock and there's a great deal of ASB and noise in and around park parade as it is. The shop use does not benefit the difficulties us neighbours have in loud noise and loitering.

Thank you in advance

Rep 27 - 31-10-20

Silvertime already have premises in Harlesden town centre, and adding another gambling store doesn't serve any purpose to a high street that is already littered with low quality shops/ premises. Brent council should be aiming to bring in business to add value to the area, not to cause further detriment. Furthermore the premises are located on a narrow footpath and with this being a bingo hall, there is high risk of people congregating outside in groups, blocking the pavement, and potentially causing antisocial behaviour. We should be encouraging business in that add value to our area, not businesses that will support gambling.

Rep 28 - 31-10-20

As local residents, we are trying to improve the public realm in Harlesden, making it safer and more amenable to children and young people. What we need are independent shops and vibrant and diverse street life in Harlesden, not endless betting shops, off-licenses and pound shops. We already have a serious problem with on-street drinking and vulnerable persons, drunks and drug addicts walking around the park parade area. A gambling or bingo hall will not help the area and will only serve to inflame the current problems we have in Harlesden, that we are trying our best to address. It was a relief to all of us to see William Hill close on both Park Parade and Station road. Betting, gambling and gaming shops kill the street - they essentially have blank, opaque, boarded up surface that offers no interaction at street level. As residents we are urging more street-facing shop facades. We have been in conversation with Anna Doyle, who currently heads the Town Centre Management team to attempt to address this. I also notice the application is being made by a Mr Roger Etchells who resides in Ashby De La Zouche in Leicestershire. If Mr Etchells would like to continue his empire of Silver City shops, we'd encourage him to do it in his charming and historic home town, rather than in Harlesden where we have serious problems with social deprivation, drug use and alcoholism. These problems won't be helped with a depressing, blank-faced Silvercity bingo hall, and its likely the premises will attract all the most vulnerable types. Allowing the application to proceed represents a backwards step for Harlesden and the amenity of our local streets.

Rep 29 - 31-10-20

There is a limit in betting shops in an area and surely this is a form of gambling. The parade is a problem area, well known for drug dealing and with the male only cafe culture it is unpleasant for people to walk in. This business will not improve the area, as I am aware there are 2 arcade types of shops already.

Rep 30 - 31-10-20

There is already a Silvertime business opporating at Jubilee Clock. I have a neihhbour who was spending all his money there and has been fortunate to break the cycle, for now. He told me how hard it was to stop going each day. He also mentioned that their 'friendliness' and 'genirosity' by offering biscuits and teas and coffee to players was a hook to keep them coming back. We do not need this type if business in Harlesden that prays on vulnerable people. It brings absolutely NO benefit to the locality!

Rep 31 - 31-10-20

We already have 2 of this kind of business on the High Streets of Harlesden. This location is in the middle of a residential part of the ward. Another slot machines hall is the last thing we need, along with extra noise, and other anti-social behaviour that too often comes with this type of establishment.

Rep 32 - 31-10-20

There's already one in Harlesden and this is not what we need in the area to gentrify it. It will promote noise pollution in the evening.

Rep 33 - 31-10-20

We have NO need for another gambling spot in Harlesden. These places attract crime and drugs and condone unemployment.

Rep 34 - Subject: 5/6 PARK PARADE HARLESDEN RE. PLANS FOR SILVERTIME COMPANY TO OPEN A GAMING SHOP

I am writing to strongly object as I live close by and Park Parade has enough problems to deal with without bringing in more. There's already a surge of men that head for park Parade every day. The whole street has become one big men's hangout. The drinkers congregate on Rucklidge which is opposite 5/6 Park Parade plus all the men further up around the men's café's When William Hill was in operation there was always a cluster of drinkers and dealers hanging around outside. The same will happen with a gaming shop and there's a girls school entrance next door that's no body seems to care about. Even though Park Parade is a shopping street its also a residential area which the council sometimes overlooks. Harlesden is a poor neighbourhood and we don't want/need any more exploitative shops opening up. We are trying to encourage people to shop in Harlesden as currently because of ASB many residents feel too intimidated to. So the reason I am against it is; c) protecting children and other vulnerable persons from being harmed or exploited by gambling.

Rep 35 - 31-10-20

Can we try to make Harlesden a bit better. We already have a severe drug dealing and street drinkers problem on park parade and leghorn Road. Men and teenagers aimlessly hanging around making noise and selling drugs. Please can you consider the applications you take on we have so many phone shops, cafes/bars and random shops serving no point but only as a place for unemployed people to hang out intimidate locals and sell drugs.

Rep 36 - 31-10-20

Gambling can be addictive and can ruin the lives of the gamblers. I do not think there is any good reason for increasing the number of places where people are invited to gamble in the London Borough of Brent or anywhere.

Rep 37 - 31-10-20

The area needs more opportunities for diversity and local engagement. Gambling houses only prey on the vulnerable and cause more problems within the area. We also already have a premises with the same product in the area which I am sure is not over run with clientele. As a community I was hoping that there would be a diversity in the new businesses being brought into the area to uplift it. More gambling houses will promote the total opposite which I totally object to. Instead, how about attracting a gym or other health related ventures to benefit the wellbeing and welfare of the local population and keep them spending their hard earned money within the area.

Rep 38 - 31-10-20

it was a disastrous attraction when it was a William hill and people were gambling on the roulette machines, it attracts crime drugs and just adds the the degrading of the area, you must surely know this

Rep 39 - 31-10-20

My neighbours and I are absolutely disgusted that this is being allowed. Why these establishments are still legal baffles me; betting is an exploitative industry that preys on the vulnerable, encouraging addiction and the subsequent destruction of lives and families. There is already a Silverline by the Jubilee Clock - what this neighbourhood needs is more independent shops and community building environments where its residents can live in harmony and peace. Please stop this, Harlesden does not need another betting shop.

Rep 40 - 01-11-20

As a resident living in the area for more than 50 years, there are more than enough gambling and betting establishments in the area than is desirable. As it is there is already a Silvertime gambling shop near the Jubilee Clock. Harlesden, once perceived as an up and coming pleasant area to live in, is one of the most deprived areas in Brent and is highly populated with people living on benefits, many of whom are in debt and are struggling to make ends meet. There is also a high number of residents with mental health issues. The last thing the residents of Harlesden need is another gambling establishment. The area needs something which will benefit the community as a whole and not something which will only go to further exploit and damage people's lives. I am against the Council granting Silvertime Amusements Ltd a Bingo Club Premises Licence.

Rep 41 - 01-11-20

The area should be raised up and not denigrated. There is a school very close by Park parade is full of school children coming and going. Sends out the wrong message to our future adults.

Rep 42 - 01-11-20

I object to this on the basis that Harlesden already has betting & gaming facilities, and that it is home to many vulnerable people. As betting and gaming is known to have deleterious effects on many people, especially vulnerable people (ie living in poverty), I believe this license shouldn't be granted. Harlesden is home to many vulnerable people. Harlesden needs a greater diversity of high street shops, not more betting and gaming facilities.

Rep 43 - 01-11-20

I would like to Object to these plans as there are already enough gambling shops in Harlesden. Another one is not what the community needs. There's already a Silvertime by the Jubilee clock and these businesses exploit and reck peoples lives. Were going through desperate times and it would be sad for this to ruin our neighbourhood. Park Parade has enough problems and this would only add to them. Thanks

Rep 44 - 01-11-20

Objection, will bring more antisocial behaviour to an already deprived area. There are several similar gambling establishments not much further down on the high street

Rep 45 - 01-11-20

I strongly object to this plan which will lead to further exploitation of local residents and antisocial Behaviour

Rep 46 - 01-11-20

Dear Brent Council, Harlesden deserves better than to have another gambling shop. Harlesden needs more diversified shops that will improve the quality of the area. There's already enough gambling places in the area and high levels of anti social behaviours. The crime rates along Park Parade are high, it's quite a scary street to walk along as a female & with young children. Every community meeting I go to the issues along Park Parade are always a hot topic. Another betting shop will only add to problems in the area. Betting / gaming shops destroy lives & communities. When William Hill closed on College rd the space was redeveloped into a lovely locally owned supermarket that supports & adds value back into the community. Harlesden needs something similar, nicer cafe / restaurants, leisure facilities etc not gambling shops that create more issues. It's not common for large square footage commercial space to come available in the area, please approve the space for purposes that enhances the community and not applications like this that destroy lives. The residents of Brent deserve better. Thank you,

Rep 47 - 01-11-20

I don't feel that this company should be given a licence to turn this shop into another "gambling area". There are more than enough of these establishments in the poorer areas of the borough and they cause huge problems in peoples lives. There are many people who have financial and mental health issues arising from using this type of place.

Rep 48 - 01-11-20

There is a pandemic with which we will encounter job losses, people getting poor and instead Of helping you are putting up a gambling shop so the addicts can squander money in an already crumbling economy. There is enough antisocial behaviour in Harlesden due to these betting shops. Don't downgrade the area anymore.

Rep 49 - 03-11-20

A gambling emporium is the last thing we need in Park Parade, it will attract problem gamblers and cause increased poverty, drunkenness and even conflicts outside. Please reconsider, as Peacocks is closing a shop selling clothing would be welcome and profitable

Rep 50 - 01-11-20

this is clearly the last thing we need in this residential neighbourhood that already deals with some many anti social problems (laundrette drug dealing, gang action and car racing, for example). Please help us try and keep some semblance of neighbourly order in our streets. Thank you. X

Rep 51

From:

Sent: 03 November 2020 07:04

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

Subject: 19969 Gambling Premises Licence New Application by Silvertime Amusements Ltd, 5 - 6 Park Parade NW10 4JH

Dear Business Licence,

We wish to **object** to the Gambling Premises Licence New Application by Silvertime Amusements Ltd, 5 - 6 Park Parade NW10 4JH.

1. Proximity to Schools

- This adult gaming centre would be in close proximity to the entrance on Park Parade for to Convent of Jesus and Mary Language College
- As well, there is a high density of schools within close proximity of many local schools/education centres/community spaces for children and young people. There is a high volume of children using Park Parade each day.
 - o Newman Catholic College
 - o John Keble Church of England Primary School
 - o Maple Walk School
 - o Refugee Support Network will be located at 60-62 High Street NW10 4LL: "helps refugee and asylum seeking children and young people build more hopeful futures through education."
 - o Picture Palace: "The council will support the development of spaces for community use e.g. for enterprise and young people."

3. Risk Assessment

There is a lack of a thorough and proper Risk Assessment using local area profiles Only 4 care homes/residential facilities are noted in the listing for "Awareness of residential facilities for the vulnerable in the the local area" page 8). This location is in close proximity to vulnerable people; for example:

- o Location is very close to Joy House, 69-85 Rucklidge Avenue, London, NW10 4QA homeless hostel 49-bedroom (116 bed)
- o Salvation Army which offers services and support to the homeless
- o Job Centre 161 High St, Harlesden, London NW10 4TL

4. Safety

Locations of CCTVs unidentified

No opening hours have been identified.

5. ASB

This address falls within the CIZ. The existence of an adult gaming centre will further exacerbate the already existing high levels of antisocial behaviour, street drinking, crime (Appendix B, Brent CIZ, section 1, page 3).

7. Noise

The residential flats above will be adversely affected by noise resulting in late-night operation

Rep 52**Sent:** 03 November 2020 10:22**To:** Business Licence business.licence@brent.gov.uk**Subject:** Objection betting shop Harlesden

Dear Sir/Madam

I would like to object to the opening of a betting shop in Harlesden.

This is because there are a number of homeless/beggars in Harlesden town centre - often around the clock or post office and drinking. This establishment will attract them with the possibility of a quick monetary fix. Betting shops are nearly always in poorer areas - thus sucking money from the already disadvantaged. Often bring petty crime into an area.

As a result of the shop opening there will be more desperate people will be hanging around an already unappealing centre, with no policing.

I would also like to add many local people may not be able to put into words an objection - you should be aware of this if you hold such a strict criteria for written objections.

Rep 53**Sent:** 03 November 2020 13:19**To:** Business Licence business.licence@brent.gov.uk**Subject:** OBJECTION TO Bingo Club Premises Licence - Silvertime, 5-6 Park Parade, NW10 4JH - 19969

Hi there

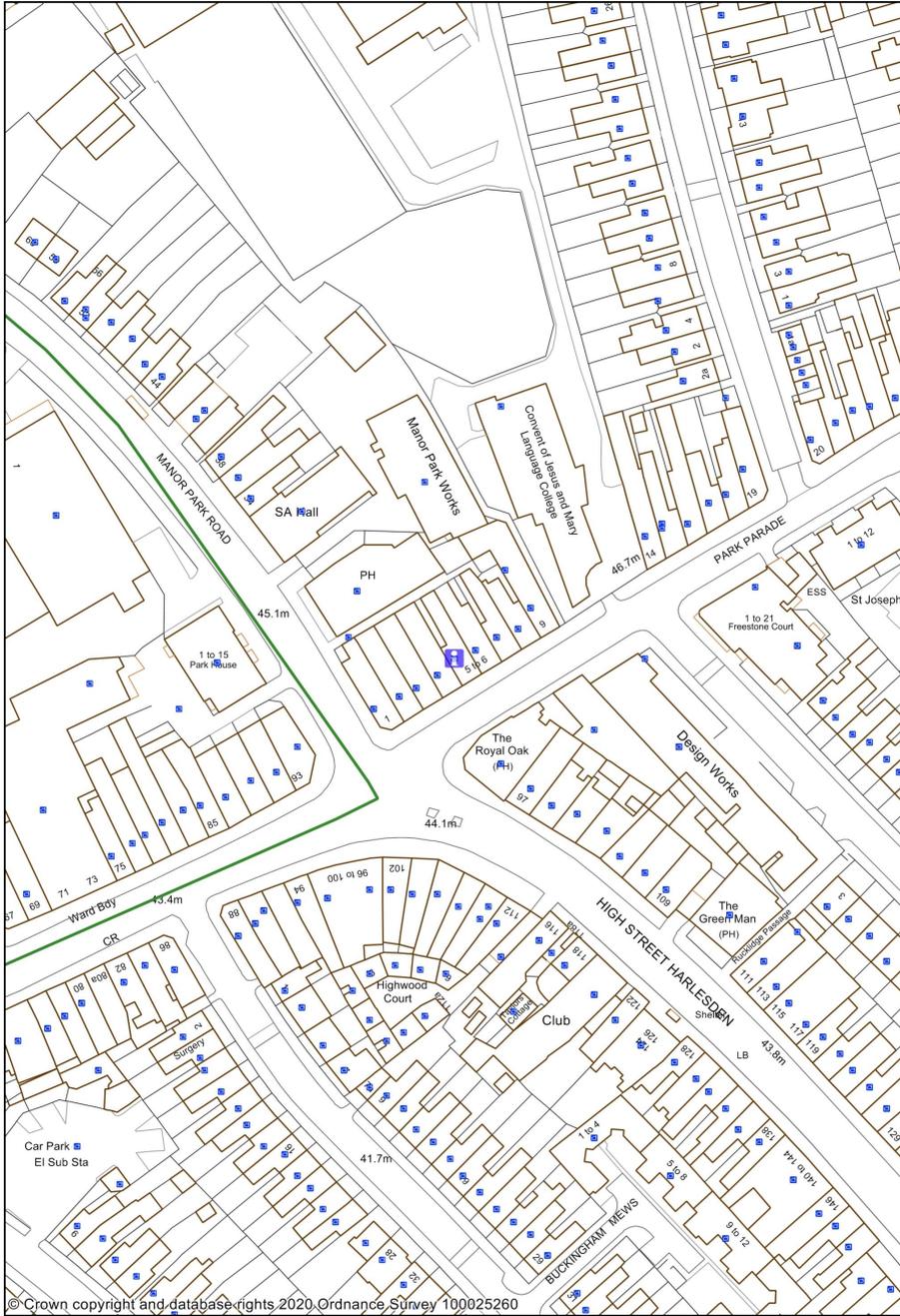
I would like to strongly object to the Silvertime being granted a license to operate on Park Parade, NW10 4JH I think it will attract and encourage criminal and unsocial behaviour to our area including drunks and drug addicts

I also have two children [REDACTED] and think they will be exposed to anti-social behaviour of those who might go to Silvertime

It will make the area even more attractive to drunks and gangs of men who drink at the jubilee clock, harlseden high street and down to park parade

I implore the council not to let this business open

Silvertime 5-6 Park Parade, NW10 4JH



1:1250

0 0.02 0.04 kilometres



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AGREED CONDITIONS - Silvertime, 5-6 Park Parade, Harlesden, NW10 4JH

Agreed with the Police and Licensing Officer

LAYOUT

1. A clear view of the interior from outside the premises shall be maintained as shown on the licence plan.

CCTV

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

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

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

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

RECORDING OF INCIDENTS

7. 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.

SIGNAGE

8. Signs to be displayed alerting customers:

No alcohol

No smoking

No persons under 18 Years

Persons will be prosecuted for causing criminal damage

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

SECURITY

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

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

12. 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.
13. A fire alarm and smoke detections system will be installed the premises are open.
14. The premises shall be staffed by a minimum of two persons at all times when the premises are open.
15. There shall be no pre-planned single staffing at any time.
16. The licensee shall install and maintain an intruder alarm on the premises.
17. The premises shall install and maintain a panic button behind the cashiers counter.

CHILDREN & YOUNG PEOPLE

18. 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.
19. Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.
20. 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.
21. 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.

IDENTIFICATION OF OFFENDERS & PROBLEM PERSONS

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

STAFF TRAINING

25. 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.
26. 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.

27. 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.

28. 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.

SEATING

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

Roger Etchells
Version 2
18.11.20

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