



Alcohol and Entertainment Licensing Sub-Committee

Wednesday 18 November 2026 at 10.30 am

Boardrooms 7 & 8 - 3rd Floor, Brent Civic Centre,
Engineers Way, Wembley, HA9 0FJ

Please note that this meeting will be held in person with members of the Sub-Committee required to attend in person.

The press and public are also welcome to attend this meeting in person. Please note the meeting is not scheduled for live webcast

Membership:

Members

Councillors:

P Ahmed (Chair)
Clinton
Alexandre

Substitute Members:

Councillors:

Aden, Burn, Mahmood, Do Rosario,
Chowdhury, Mulaisho, Vakani

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

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[Council meetings and decision making | Brent Council](#)

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 a Premises Licence by Silvertime Amusements Ltd for the premises known as 446 High Road & 8 Park Lane, Wembley Middx HA9 6AH, pursuant to the provisions of the Licensing Act 2003	1 - 96



- Please remember to **SWITCH OFF** your mobile phone during the meeting.
- The meeting room is accessible by lift and seats will be provided for members of the public.

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LICENSING ACT 2003

Application for a Premises Licence

1. The Application

Name of Applicant:	Silvertime Amusements Ltd
Name & Address of Premises:	446 High Road & 8 Park Lane, Wembley Middx HA9 6AH
Applicants Agent:	Woods Whur

The application is for an Adult Gaming Centre

2. Background

446 High Road, Wembley currently holds a Bingo licence. This application will incorporate 8 Park Lane and the whole premises will become an Adult Gaming Centre. The bingo licence at 446 High Road will be surrendered if the licence is granted.

3. Relevant Representations

Representations have been received and withdrawn from the Licensing Officer.
Representations remain outstanding from Councillors and members of the public.

4. Interested Parties

None

5. Policy Considerations

None Specific

6. Associated Papers

- A. Application Form
- B. Local Area Risk Assessment
- C. Representations
- D. OS 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: **Silvertime Amusements Limited**

7. The applicant's registered or principal address:

48-50 High Street, Watford

Postcode: **WD17 2BS**

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

002913-N-103141-018

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): **Silvertime Amusements**

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

446 High Road & 8 Park Lane, Wembley

Postcode: **HA9 6AH**

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.

This application relates to both 446 High Road, the existing Silvertime premises which has a Gambling Act Premises Licence, and also to adjacent premises at 8 Park Lane due to the existing premises being extended into 8 Park Lane. If this application is granted as applied for and prior to the new premises licence covering both units opening and trading the existing licence will be surrendered.

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:

446 High Road, Wembley, London, HA9 6AH

509 High Road, Wembley, HA0 2DH

10 Bank Buildings, High Street, London, NW10 4LT

53 High Street, London, NW10 4NJ

527 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)

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. ☒

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 ☒
- We understand that if the above requirements are not complied with the application may be rejected ☒
- 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:

Woods Whur
Signature:

Print Name: **Woods Whur**

Date: **3 September 2026**

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: 

24 Postal address for correspondence associated with this application:

Woods Whur

St James House

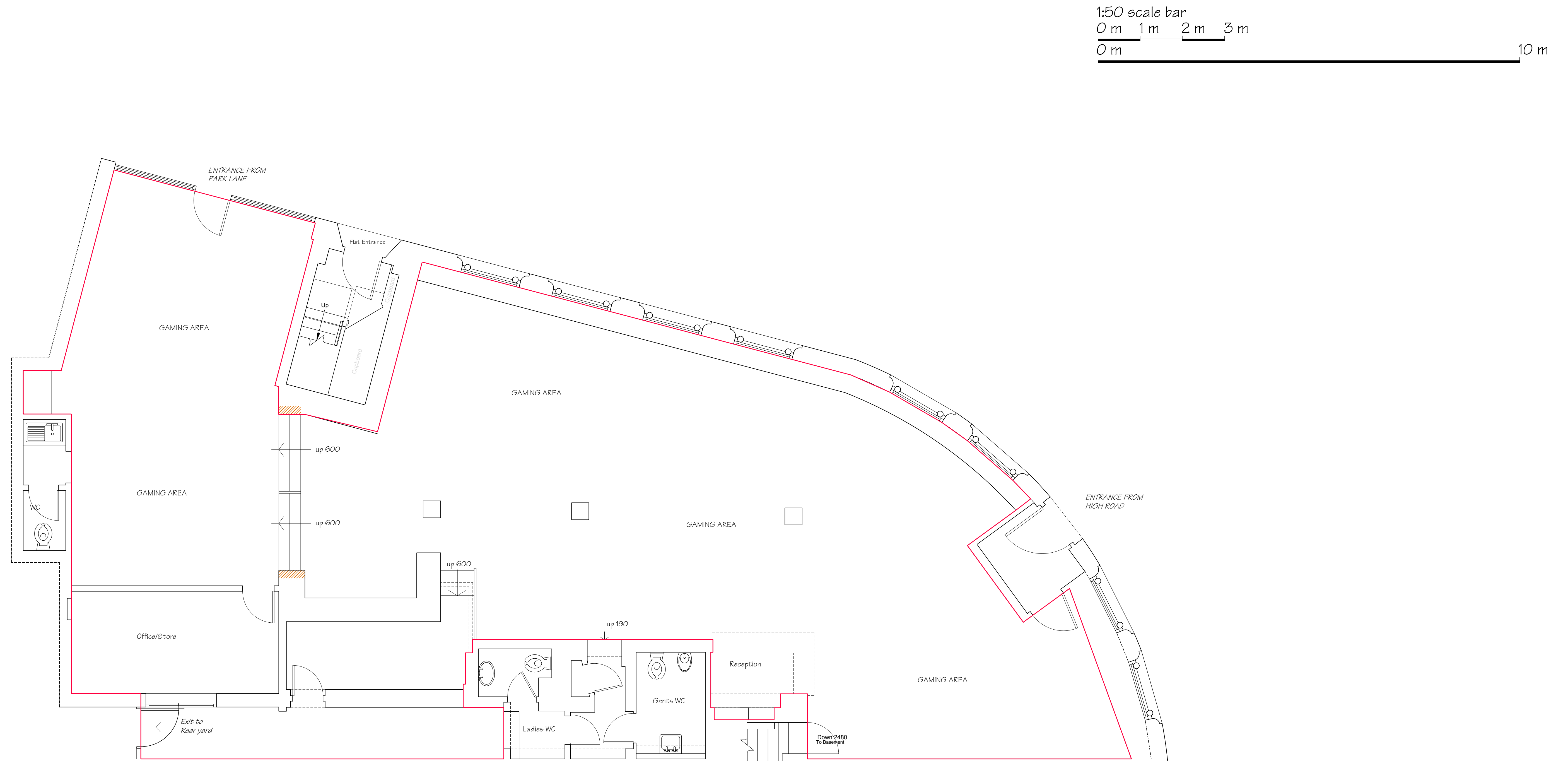
28 Park Place

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:





Proposed Ground Floor Layout
1-50

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Premises number or licence number:	11406
Type of premises	Adult Gaming Centre
Region (if applicable):	Brent
Area (if applicable):	Wembley Hill (Ward)
Premises Address:	446 High Road, Wembley, HA9 6AH & 8 Park Lane, Wembley, HA9 7RP
Name of Assessor:	Chris Rees-Gay (Woods Whur)
Colleagues Present:	Phil Wheeler (Silvertime)
Date(s) of assessment:	12 January 2026 Walkround 2 March 2026
Review date:	26 August 2026

The Operator

Silvertime Amusements Ltd is licensed by the Gambling Commission. Silvertime Amusements Ltd is an extremely experienced operator of these types of premises, having been a family owned and run business for over 30 years.

It is familiar with the guidance and information contained in the London Borough of Brent's recent [Statement of Licensing Principles for Gambling](#) (2025-2028) and the Guide to Undertaking Local Gambling Risk Assessments contained within the Statement of Licensing Principles. It is noted that there is no change from the previous Statement of Gambling Principles.

Silvertime have operated four Adult Gaming Centre (AGC) premises within the London Borough of Brent at :

10 Bank Buildings, Harlesden (AGC) - Issued 29th October 2013

53 High Street, Harlesden (AGC) - Issued 1st September 2007

509 High Road, Wembley (AGC) - Issued 15th April 2020

527 High Road, Wembley (AGC) - Issued 6th January 2014

Silvertime have operated within the area for a period of over 12 years. The premises located at 446 High Road has been open since 9th May 2018. The operator's existing premises at 446 High Road has operated successfully and in full compliance with its licence conditions in this location since 2018 and this application seeks to extend that same standard of safe and responsible operation into the adjoining unit at 8 Park Lane.

We believe this Local Area Risk Assessment (and future updates) identifies all necessary steps required in both complying with the Brent Statement of Licensing Principles for Gambling, upholding the Licence Conditions and Codes of Practice and promoting the three Licensing Objectives.

Local Area Profile

The High Road is located in the area of Wembley which is situated within the London Borough of Brent. Wembley is the area's largest suburb and is famed for its stadium and events. The High Road is part of a conservation area and is known for its multicultural population and diversity with many of the premises consisting of independent ethnic shops together with a mix of chain stores. The stadium is a 22 minute walk from the High Road. The High Road has heavy footfall on event/show days due Wembley Central Station being situated on the High Road. The building consists of three floors, the premises is located on the ground floor with residential properties located above.

Customer Base: The majority of customers are Romanian and Indian, with the age range being 30-60years of age.

In compiling this assessment we have considered the Council's latest Statement of Gambling Principles. Attention was paid to Section 5 of the policy which details the Brent Profile. This Section provides background into Health in Brent, deprivation, crime and disorder, local amenities and further considerations to take into account when undertaking a Local Area Profile. Several other research studies have been undertaken into the impact of gambling on the vulnerable which have helped us to understand the key issues concerning gambling related harm so as to protect those that are vulnerable

Local Area Risk Assessment - 446 High Road & 8 Park Lane

For this updated LARA we have utilised the Council's Local Area Profiling tool for gambling risk contained within the Policy. (<https://maps.brent.gov.uk/map/Aurora.svc/run?script=%5cAurora%5cAurora+-+Gambling.AuroraScript%24&nocache=2097243282&resize=always>).

We have also cross referenced this with our own assessment of the local area to ensure that all information is up to date where possible.

The Policy does not define specific gambling vulnerability hotspots or zones within the borough. However, Brent has identified several areas of deprivation, as indicated by the Index of Multiple Deprivation (IMD). These areas should be regarded as being at high overall risk of gambling-related harm. Appendix One includes a map showing the location of the premises, which is located in an area recognised for issues related to housing and living environment deprivation.

The Statement of Gambling Principles confirms that there is a Public Spaces Protection Order "PSPO" in place. This premises sits in both the Borough Wide PSPO and the Wembley Park PSPO. Specific measures are in place including:

- Refusing entry to customers who appear to be under the influence of alcohol,
- Staff training in how to recognize those that have been drinking,
- Not allowing street drinking to take place outside the premises, etc.

As such, we have assessed the specific risks associated with the vulnerabilities linked to deprivation and gambling related harm as well as the location where the premises are situated. We have also relied upon our time of being open and operating to support the completion of this updated risk assessment.

Local Socio Economic Patterns:

The stretch of High Road, Wembley sits within the Wembley Central area of the London Borough of Brent and reflects the broader socio-economic characteristics of this busy town-centre corridor. The area is highly urban in character, with a dense population and a strong multicultural identity. It is one of the more ethnically diverse parts of the borough, with a particularly high representation of residents from South Asian backgrounds alongside other minority ethnic groups.¹ The population profile tends to be younger than the national average, with a significant proportion of working-age adults, students, and young families drawn to the area by transport connectivity, employment opportunities, and relatively accessible housing options compared with other parts of London. The predominant age group in the area comprises residents aged 20 to 39, accounting for 36% of the population². We acknowledge the specific risk factors associated with this younger demographic, including the financial instability often experienced during the early stages of employment. To address these risks, all staff are required to complete mandatory training focused on identifying and intervening when potential gambling harm indicators arise and on implementing robust player protection tools to mitigate these risks.

Economically, residents are engaged in a wide range of occupations, spanning professional and administrative roles, service and retail employment, and routine or manual work. The proximity of Wembley Central station and the High Road's support employment in retail, hospitality, transport, and small businesses. While

¹ [Demographics of Wembley, HA9 7RP - Crystal Roof](#)

² [Demographics of Wembley, HA9 7RP - Crystal Roof](#)

Local Area Risk Assessment - 446 High Road & 8 Park Lane

average household incomes in the area are broadly around national averages, they are modest relative to London living costs, and this contributes to moderate levels of deprivation when assessed through indices that consider income, housing affordability, and access to services.

The area cannot be characterised as affluent, but it also does not fall within the most deprived categories nationally. This is reflected in the Total household income, measured as £54,200 p/a, which sits in line with the average for England and Wales figures and above average compared to the total for the Brent (Borough), which sits lower at £53k.³ It represents a mixed socio-economic profile with both resilience and vulnerability.

The High Road itself is a focal point for local economic and social activity. It accommodates a high concentration of small independent shops, food outlets, and service businesses that cater to the needs of the surrounding community and reflect its cultural diversity. High footfall and constant activity contribute to a lively street environment.

This part of Wembley lies within a designated London Opportunity Area, and as such is subject to ongoing and planned regeneration. New residential developments, improvements to public spaces, and investment in infrastructure are gradually reshaping the socio-economic landscape. These changes are expected to increase housing supply and economic activity, while also placing pressure on existing communities through rising demand and costs. As a result, the area around the High Road can be understood as a place in transition, where long-established local communities coexist with newer residents and emerging development, creating a complex and evolving socio-economic pattern.

Late Night Operations:

The night-time economy around High Road, Wembley is characterised by steady evening activity rather than a destination nightlife scene. It is shaped by transport movements, late-opening retail and food uses, licensed premises in the wider area, and periodic event-related surges. The area remains active into the night, with fluctuating levels of footfall and a changing street environment as the evening progresses.

We recognise that these fluctuations are directly relevant to promoting the licensing objectives, as varied footfall from late-night customers and transport users can create variable levels of risk to children and vulnerable persons and to the prevention of crime and disorder. This risk is mitigated through CCTV coverage, the Challenge 25 proof of age scheme, clear external signage and lighting and staff trained to recognise and respond to signs of vulnerability or intoxication. These measures ensure the premises operates safely within this steady night-time economy rather than a concentrated nightlife destination.

Other Gambling Premises:

Along High Road, Wembley, gambling premises form part of the wider mix of town-centre commercial uses rather than a dominant or clustered feature. The primary form of gambling provision present along the High Road consists of betting offices and AGC's.

³ [Affluence of Wembley, HA9 7RP - Crystal Roof](#)

Local Area Risk Assessment - 446 High Road & 8 Park Lane

There are no large-scale destination gambling venues within the immediate stretch of the High Road and gambling uses do not define the overall character of the area. Instead, they function as part of a broader town-centre offer serving local residents and passing trade.

These premises are well dispersed across the locality which can be demonstrated by the map found at **Appendix 4**.

A physical walk round was conducted within a 0.2 mile radius of the premises to confirm those premises listed from the Desk Top exercise were where stated.

We acknowledge that the presence of multiple gambling premises along High Road, Wembley creates potential cumulative impact risks, including anti-social behaviour, opportunistic crime and exposure of vulnerable individuals to gambling opportunities. This underlines the need for safeguarding, customer protection and crime prevention, which the operator has embedded into the premises' operating procedures listed below.

These measures have ensured the safe and compliant operation of the operator's existing premises at 446 High Road without incident, since 2018, demonstrating their practical effectiveness and safety in this specific locality. The extension of the AGC into the adjoining unit at 8 Park Lane will operate under the same safeguarding, monitoring and design standards, providing continuity of the measures already proven at this location and ensuring the expanded AGC premises continues to meet the licensing objectives.

Local Area				
Licensing Objective		Risks	Existing Control Measures	Further Controls Adopted
1.1	Protecting children and other vulnerable persons from being harmed or exploited by gambling	There are a number of educational facilities in the area, including but not limited to within half a mile of the site as follows: - London School of Science & Technology, 401-403 High Road, HA9 7AB (135ft) - Eliana Bilingual Nursery, 10 Park Lane, HA9 7RP (138ft) - Park Lane Primary School, Park Lane, HA9 7RY (0.2 miles) - London Road Nursery, 22 London Road, HA9 7EX (0.1 miles) (There but looks permanently shut) - Ark Elvin Academy, Cecil Avenue, HA9 7DU (0.2 miles) - St Joseph Junior School, Waverley Avenue, HA9 6TA (0.4 miles) - St Joseph Infants School, Waverley Avenue, HA9 6TA (0.5 miles) - Happy Days Montessori School, Empire Way, HA9 0RJ (0.6 miles) - Elsley Primary School, Tokyngton Avenue, HA9 6HT (0.7 miles) - St Christopher's School, 71 Wembley Park Drive, HA9 8HE (0.7 miles) - Wembley Primary School, East Lane, HA9 7NW (0.8 miles) - Barham Primary School, Danethorpe Road, HA0 4RQ (0.8 miles) - Preston High School, Carlton Avenue E, HA9 8NA (1 mile) - Lyon Park Primary School, Vincent Road, HA0 4HH (0.9 mile) Support and Educational services for teenagers and young adults are provided at: - Mandhata Youth Centre, 20A Rosemead Avenue, HA9 7EE (0.2 miles) - ULTRA Education CIC, Empire Way, HA9 0RJ (0.5 miles) - St Johns Community Centre, Crawford Avenue, HA0 2HX (0.5 miles)	- Third party testing by (Check Policy) on age restricted sales systems takes place by testing all working shifts on a regular basis. - The total number of staff and licensed door supervisors is risk assessed to meet the needs of the LCCP conditions set for the venue (Brent Policy Para 4.23). - As there is a PSPO in place there is a policy to refuse entry to customers who appear to be under the influence of alcohol or drugs. - We ensure that the customer toilets are checked every hour for evidence of drug taking. These toilet checks are documented stating the time and member of staff who made the checks. Access to the toilet is controlled by staff. - Prominent GamCare documentation is displayed at the premises. - Induction and refresher training is undertaken by every member of staff at least every 12 months. The training includes drug and alcohol awareness training to include homeless and street drinking. This training is formally recorded on each member of staff's training record, which again is available for presentation to the Licensing Authority immediately upon request.	- Silvertime management have designated Mr Phil Wheeler with the responsibility for championing the protection of children, including safeguarding and child sexual exploitation, as well as other vulnerable persons from harm. He is also the point of contact for concerns in relation to Adult Safeguarding. - Silvertime will implement safeguarding training to ensure that staff have the basic awareness of safeguarding children and other vulnerable adults. - All staff are aware of the Gambling Commission definition of vulnerable persons, it being "it will, for regulatory purposes, assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs". - Silvertime are aware of child truancy during school times, i.e. being aware that: a. Children should not be in the premises. b. The school day is between 0830 - 1530 and staff should be extra vigilant during these periods. Currently there is no issue with this, should there be then we

		- Young Brent Foundation, 660 Harrow Road, HA0 2HB (0.8 miles) - Wembley Scout Group, 86 Station Grove, HA0 4AN (0.5 miles) Student Accommodation facilities within a 1 mile radius of the premises: - Sterling Court, Lakeside, HA9 0BU (0.7 miles) - Grand Felda House, Empire Way, HA9 0EF (0.8 miles) - Unite students Olympic Way, 23 Olympic Way, HA9 0FR (0.9 miles) - Unite Students Arch View , First View, HA9 0JD (1 mile) - Pavilion Court, 20 First Way, HA9 0PE (1 mile) Facilities for the homeless (including hostels) and potentially vulnerable persons are located at: - SNG, 22 Wembley Park Blvd, HA9 0HP (0.7 miles) - The Shelter Scheme, , 8-18 Preston Road, HA9 8JG (0.7 miles) - Brent Housing Project, Engineers Way, HA9 0FJ (0.8 miles) Care Homes including but not limited to within 1 mile are: - Park Lane Residential Home, 52 Park Lane, HA9 7RZ (0.3 miles) - Beechwood Care Home, Napier Road, HA0 4UA (0.4 miles) - Care with Hope, 55 Castleton Avenue, HA9 7QE (0.6 miles) - Coplands Care Home, 1 Copland Avenue, HA0 2EN (0.6 miles) - Willow House, Victoria Court, HA9 6QN (0.7 miles) Places of worship: - The Potter's House Church Wembley, First Floor, 397 High Rd, Wembley HA9 6AA (0.03 miles) - Park Lane Methodist Church, Park Ln, Wembley HA9 7SG (0.2 miles)	- As there is a PSPO in place as an operator we take all responsible steps to prevent street drinking of alcohol outside the premises and ban from the premises those who do so. - Staff are trained to identify and interact with any customers who are identified as playing more than one gaming machine, including tablet machines at the same time. If required, to self exclude those that need it. - Self Exclusion of customers, as per the Silvertime Self Exclusion Policy, is added to the SmartHub to ensure that all local premises are aware.	will engage with local schools. - Management controls will be implemented to ensure that staff are trained in relation to the risk indicators set out below: Developing relationships between a child and an older person. - Children in the company of a group of older persons. - Children regularly attending premises and meeting with a number of different older persons, particularly where older persons may be facilitating gambling for children. - Children outside of licensed premises developing relationships with an older person, particularly an older person facilitating gambling for children. - Children leaving the locality of the premises with older persons, particularly with a group of older persons. - Children looking uncomfortable in the company of, or leaving with, older persons, particularly groups of older persons. ** Although obviously it is noted that our Premises is an over 18 premises only. - In addition and in line with the Brent policy, there are Safeguarding Policies and Procedures for both Adults and for Children.
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Local Area Risk Assessment - 446 High Road & 8 Park Lane

		- Spiritualist Church, 1 Elm Rd, Wembley HA9 7JA (0.2 miles) - ICGC Royal Life Centre, Ark Elvin Academy, Cecil Ave, Wembley HA9 7DU (0.2 miles) - St Joseph's Catholic Church, 339 High Rd, Wembley HA9 6AG (0.3 miles) - Shiv Shakti Maa Meldi Temple, 594 High Rd, Wembley HA0 2AF (0.3 miles) - Wembley Muslim Centre, 3 Lancelot Rd, Wembley HA0 2AL (0.3 miles) - Church Of God in Wembley, Cedar Hall, Station Grove, Wembley HA0 4AR (0.3 miles) - TruthVine Church, 33 Wembley Hill Rd, Wembley HA9 8AS (0.4 miles) - Central Mosque Wembley, 35 Ealing Rd, Wembley HA0 4AE (0.4 miles) - Shirdi Sai Baba Temple Wembley, Union Rd, Unionhall, Wembley HA0 4AU (0.4 miles) - London Nadarajar Temple, 3C Ranelagh Rd, Wembley HA0 4TW (0.4 miles) - Eelapatheeswarar Aalayam, Pavitt Hall, Union Rd, Wembley HA0 4AU (0.4 miles) - St John the Evangelist, 3 Crawford Ave, Wembley HA0 2HX (0.5 miles) - St John's Community Centre, 1 Crawford Ave, Wembley HA0 2HX (0.5 miles) - Masjid, Wembley HA9 0RJ (0.5 miles) - St Augustine's Church, Wembley Park, 152 Wembley Hill Rd, Wembley HA9 8EW (0.6 miles) - The Church of Jesus Christ of Latter-day Saints, 44 Wembley Park Dr, Wembley HA9 8HA (0.6 miles) - Hindu Priest Dipak Bhatt, 30 Talbot Rd, London HA0 4UE (0.6 miles) - Ealing Road Methodist Church, 85 Ealing Rd, Wembley HA0 4TL (0.6 miles) - Faizan-e-Madinah Wembley Dawat-e-Islami, 8-10 Forty Ave, London HA9 8JW (0.7 miles) - Wembley Park United Reformed Church, The Broadway, East Ln, Wembley HA9 7NN (0.7 miles)		
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Local Area Risk Assessment - 446 High Road & 8 Park Lane

		- New Life Christian Centre International, Tokyngton Community Centre, St. Michaels Ave, Wembley HA9 6SA (0.8 miles) - Prayer room, 11 Exhibition Way, Wembley Park, Wembley HA9 0FA (0.8 miles) - Ahle Sunnah Mosque, Wembley HA0 4JF (0.8 miles) - Shiv Temple, Shree Sanatan Hindu Mandir, Wembley HA0 4TA (0.9 miles) - Muslim Prayer Space, 100 Hirst Cres, Wembley HA9 7HH (0.9 miles) - Shri Sanatan Hindu Mandir, Ealing Rd, Wembley HA0 4TA (0.9 miles) - V2V Community Church, Hirst Hall, Tower Ln, East Ln, Wembley HA9 7NB (1 mile) - Islamic Cultural Centre (Monks Park Masjid), 72-74 Harrow Rd, Wembley HA9 6PL (1 mile) Awareness of gambling care agencies in the local area. - National Problem Gambling Clinic (6.8 miles) There are no facilities for problem gambling in the vicinity. Job centre/employment agencies in the close area: - Job Centre, 6 St. Johns Road, Town Centre, HA9 7JD - Capital Jobs, 49 Dagmar Avenue, HA9 8DQ (0.4 miles) - FM Workforce, Eagle Road, HA0 4SL (0.9 miles) - West Recruit, 1 Empire Way, HA9 0EW (0.9 miles) - Ingeus, 16 First Way, HA9 0AF (1 mile) Family Service Centres: - Salisbury Support 4 Autism, 69 Castleton Avenue, HA9 7QE (0.5 miles) There are no Drug and Alcohol Treatment		
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		Centres within a 1 mile radius of the premises. Alcohol Anonymous Meeting at Harrow (3.3 miles) Narcotics Anonymous meeting at The Soho Recovery Centre (8.3 miles) There is one Brent Housing Project within a 1 mile radius which is Brent Housing Partnership located 0.9 miles from the premises. There are no soup kitchens within the vicinity and one Foodbank (foodcycle) located 0.1 mile from the premises located at Methodist Church, Park Lane, HA9 7SG. Pay day loan shops: - H&T Pawnbrokers, 544 High Road, HA0 2AA (0.2 miles) ATMs and Banks: - Nationwide Building Society, New Oxford House, 470 High Rd, Wembley HA9 7BE (0.05 miles) - Halifax, 427 High Rd, Middlesex HA9 7AB (0.06 miles) - Tesco Bank ATM, TESCO EXPRESS WEMBLEY, GREATER, London HA9 7BN (0.09 miles) - Barclays Bank, 506 High Rd, Wembley HA9 7BP (0.1 mile) - Santander, 514 High Rd, Wembley HA9 7BT (0.1 mile) - ATM, 520 High Rd, Wembley HA9 7BZ (0.1 mile) - Natwest Wembley, 520 High Rd, Wembley HA9 7BZ (0.1 mile) - Lloyds Bank, 564-568 High Rd, Middlesex HA0 2AB (0.2 miles) - HSBC Wembley, 584 High Rd, Wembley HA0 2DB (0.3 miles) - ATM (Post Office), 325 Harrow Rd, Wembley HA9 6BA (0.3 miles)		
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Local Area Risk Assessment - 446 High Road & 8 Park Lane

		- Tesco Bank ATM, Central, Tesco Metro Wembley, High Rd, London HA9 7AF (0.4 miles) - ICICI Bank UK, 47 Ealing Rd, Wembley HA0 4BA (0.5 miles) - Tesco Bank ATM, Tesco Express, Empire Way, London HA9 0EW (0.5 miles) - Punjab National Bank, 66C Ealing Rd, Wembley HA0 4TH (0.7 miles) - ATM (Post Office), 200 Ealing Rd, Wembley HA0 4QG (0.8 miles) - Sainsbury's Bank Cash Machine (ATM), 7-9 Exhibition Way, Wembley Park, Wembley HA9 0FA (0.8 miles) - Tesco ATM, 3 Williams Way, Wembley HA0 2FP (1 mile) - Euronet ATM, 9 Olympic Way, London HA9 0NP (1 mile) Local Alcohol Licensing Premises: - VIP Lounge, 546, High Road, Wembley HA0 2AA (0.2 miles) - Masti Club, 576-582 High Road, Wembley HA0 2AA - Wetherspoon, 397 High Road, Wembley HA9 6AA - The Robin, 397a High Rd, Wembley, HA9 6AA Gambling premises: - Betfred, 458 High Rd, Harrow, Wembley HA9 7AY (0.02 miles) - Paddy Power, 389 High Rd, Wembley HA9 2AA (0.05 miles) - MERKUR Slots - Wembley, 478 High Rd, Wembley HA9 7BH (0.06 miles) - Jennings Bet, 429 High Rd, Wembley HA9 7AB (0.07 miles) - Silver Time, 509 High Rd, Wembley HA0 2DH (0.2 miles) - Gr8odds, 558 High Rd, Wembley HA0 2AA (0.2 miles) - Coral, 576, Middlesex, 582 High Rd, Wembley HA0 2AA (0.3 miles)		
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Local Area Risk Assessment - 446 High Road & 8 Park Lane

		- William Hill, 6 Neeld Cres, Wembley Hill Rd, Wembley HA9 6QU (0.3 miles) - William Hill, 153 Harrow Rd, Wembley HA9 6DN (0.8 miles) - Coral, Middlesex, 86 East Ln, Wembley HA0 3NJ (0.9 miles) - Betfred, 147 Wembley Park Dr, Wembley Park, Wembley HA9 8HQ (0.9 miles) - Ladbrokes, 240, 240a Ealing Rd, Wembley HA0 4QL (0.9 miles) - William Hill, 2/3, Heather Park Parade, 2/3 Heather Park Dr, Wembley HA0 1SL (1 mile) - Ladbrokes, Middlesex, 86 East Ln, Wembley HA0 3NJ (1 mile) Bus stops and transport: - Park Lane, Bus Stop CL (0.03 miles) - Wembley High Road, Bus Stop SH (0.06 miles) - Ark Elvin Academy / Park Lane, Bus Stop SG (0.06 miles) - Ark Elvin Academy / Park Lane Bus Stop (0.07 miles) - Wembley High Road Station (0.09 miles) - Wembley Central Station, Bus Stop CM (0.1 mile) - Wembley Central Station, Bus Stop CN (0.1 mile) - Cecil Avenue, Bus Stop SP (0.2 miles) - Wembley Central Train Station (0.2 miles) - Wembley Triangle, Bus Stop SM (0.2 miles) - Wembley Central Station, Bus Stop CS (0.2 miles) - Cecil Avenue, Bus Stop SE (0.2 miles) - Wembley Triangle, Bus Stop SC (0.2 miles) - Wembley Central Station, Bus Stop CT (0.2 miles) - High Road Wembley, Bus Stop CV (0.3 miles) - Dagmar Avenue, Bus Stop D (0.3 miles) - Wembley Central Station, Bus Stop CP (0.3 miles) - Wembley Stadium Bus Stop (0.4 miles) - Wembley Stadium, Bus Stop SA (0.4 miles)		
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		- Wembley Stadium Train Station (0.4 miles) - North Wembley, East Ln, Wembley HA9 7NT (0.9 miles) - Wembley Park Underground Station (1 mile) General Summary of Risks Considered: Children entering site unnoticed or unchallenged. Potentially Vulnerable people being able to gamble. Failure to recognise signs associated with problem gambling or substantial changes in gambling style Failure to provide information to players on responsible gambling. Failure to properly administer the self-exclusion process and maintain its effectiveness thereafter, including breaches and reinstatements. Customers experiencing financial hardship may engage in gambling that poses a greater risk of harm or exploitation. Customer may be asked to leave the premises for welfare, safety or safer-gambling reasons. Children passing the frontage may observe the customer once outside, which could cause unnecessary concern. Customers may have limited English, which could reduce their understanding of safer gambling information. Customers gambling late at night while appearing fatigued or with reduced alertness may make poor decisions, increasing the risk of harm or exploitation.	Silvertime employ the services of an external SIA door supervisor company for all its venues. The hours that the SIA door supervisor is employed is risk assessed. There is comprehensive CCTV in place, with both internal and external cameras and remote viewing capability for senior management, allowing for real-time oversight during out-of-hours periods.	
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		This premises is situated in an area where high levels of customers do not speak English as their first language.	Staff presence at all times, supported by continuous floor coverage, ensuring that lone customers or those presenting signs of fatigue do not go unmonitored. Silvertime take staffing levels very seriously. Levels of staff are risk assessed. Staff are trained on the following: observing changes in pace, attention or responsiveness, identifying prolonged sessions of play where tiredness may emerge, engaging with customers showing signs of reduced focus or slower reactions, applying the Identify–Interact–Evaluate framework consistently throughout the day, and recording fatigue-related observations on SmartHub where welfare concerns are identified. Please note this approach acknowledges that fatigue can play a role in decision-making but avoids any assumption that this is solely a feature of late-night play. Instead, it emphasises that staff awareness and proportionate engagement are the primary safeguards at all times of day, consistent with Silvertime’s operational model. Multilingual Safer Gambling information is provided in the relevant	
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			languages. Simplified explanations will be given by staff when conversing. There is signposting to the multilingual National Gambling Helpline.	
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1.2	Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime	The Metropolitan Police crime data dashboard reveals over a one year period (December 24 to November 25) 2842 crimes were reported in the Wembley Hill ward. The highest reported crimes were Violence and sexual offences, anti-social behavior and theft from the person. Over the same period a total of 32,961 crimes were reported across the borough. The highest reported crime within the borough is violence against the person with 9 thousand + reports, followed by theft and drug offences. Reported crimes linked to High Road, Wembley within the vicinity of this premises mainly consist of shoplifting and theft against the person. The premises is located near to a Primark, Boots, TK Maxx, Poundland, Shoezone and other high street stores. The crime data reflects the types of crime you would expect to encounter on a busy shopping street, however, none of these crimes are particularly linked with gambling premises.	- Silvertime employ the services of an external SIA door supervisor company for all its venues. The hours that the SIA door supervisor is employed is risk assessed (Brent Policy Para 4.23) - Induction training is provided to all staff working at the premises and refresher training to every member of staff at least every six months. This training includes: a. the specific local risk to the licensing objectives that have been identified for these premises within this LARA; b. drug and alcohol awareness training to include homeless and street drinking; c. conflict management training provided by an instructor qualified to formally recognise national or equivalent standard on dealing with conflict. d. Basic anti money laundering training This staff training is recorded formally for each member of staff in their training records, and is available for presentation to the licensing authority immediately upon request - As there is a PSPO in place, Silvertime take all reasonable steps to prevent street drinking of alcohol directly outside the premises, and ban those from the premises who try to do so.	Please see Terrorism Risk Assessment concerning protective security advice in relation to counter-terrorism. In addition please also see the Silvertime Counter Terrorism Policy. During the late-night operation of the premises enhanced control measures will be in place such as: - confirming door control protocols - SIA-registered security where indicated by risk assessment. - CCTV coverage with both internal and external cameras and remote viewing capability for senior management allowing for real-time oversight during out-of-hours periods. - Staff presence at all times, supported by continuous floor coverage, ensuring that lone customers or those presenting signs of fatigue do not go unmonitored.
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1.3	Ensuring that gambling is conducted in a fair and open way	Failure to provide or manage the complaints procedure correctly (Gambling related complaints). Failure to provide clear or correct terms and conditions.	- Terms and conditions signage are displayed. - Betting and game rules signage is Displayed. - All notices regarding gambling advice or support information are provided. - All staff are trained with the BACTA codes of practice. - Staff are aware of the Silvertime terms and conditions, and relevant game rules associated with all gaming machines offered on the premises. - Customer complaint forms are available on request at the Support Desk. Staff are trained in the Silvertime complaints procedure. - As an operator, we acknowledge that this licensing objective has a direct link with the successful achievement of the crime and disorder objective. - In terms of advertising, all advertising codes are adhered to in order to stop customers from being misled. - There is a Silvertime Advertising Policy to cover this.	
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Gambling Operation & Physical Design (Internal and External)				
Licensing Objective		Risks	Existing Control Measures	Further Controls Adopted
2.1	Protecting children and other vulnerable persons from being harmed or exploited by gambling	There are a number of educational facilities in the area, including but not limited to within half a mile of the site as follows: - London School of Science & Technology, 401-403 High Road, HA9 7AB (135ft) - Eliana Bilingual Nursery, 10 Park Lane, HA9 7RP (138ft) - Park Lane Primary School, Park Lane, HA9 7RY (0.2 miles) - London Road Nursery, 22 London Road, HA9 7EX (0.1 miles) (There but looks permanently shut) - Ark Elvin Academy, Cecil Avenue, HA9 7DU (0.2 miles) - St Joseph Junior School, Waverley Avenue, HA9 6TA (0.4 miles) - St Joseph Infants School, Waverley Avenue, HA9 6TA (0.5 miles) - Happy Days Montessori School, Empire Way, HA9 0RJ (0.6 miles) - Elsley Primary School, Tokyngton Avenue, HA9 6HT (0.7 miles) - St Christopher's School, 71 Wembley Park Drive, HA9 8HE (0.7 miles) - Wembley Primary School, East Lane, HA9 7NW (0.8 miles) - Barham Primary School, Danethorpe Road, HA0 4RQ (0.8 miles) - Preston High School, Carlton Avenue E, HA9 8NA (1 mile) - Lyon Park Primary School, Vincent Road, HA0 4HH (0.9 mile) Support and Educational services for teenagers and young adults are provided at: - Mandhata Youth Centre, 20A Rosemead Avenue, HA9 7EE (0.2 miles) - ULTRA Education CIC, Empire Way, HA9 0RJ (0.5 miles)	- There is comprehensive CCTV in place. - The CCTV system in place ensures that all entry and exit points are covered, so that there can be frontal identification of every person entering in any light condition. - The CCTV system records continually whilst the premises is open for licensable activities and during all times when customers remain on the premises. It covers the gaming area, office and toilet entrance. All recordings are stored for a minimum of 31 days, with a date and time stamp. Recordings are made available immediately upon request to the Police or authorised officer throughout the entire 31 day period, (as per the Silvertime CCTV cameras, recordings and retention policy) - There is a spotter monitor at the customer service desk and in the office. - There is a staff member who is conversant with the operation of the CCTV on the premises at all times when it is open. - All notices regarding gambling advice or support information are displayed at the premises.	- Silvertime management have designated Mr Phil Wheeler with the responsibility for championing the protection of children, including safeguarding and child sexual exploitation, as well as other vulnerable persons from harm. He is also the point of contact for concerns in relation to Adult Safeguarding. - Silvertime will implement safeguarding training to ensure that staff have the basic awareness of safeguarding children and other vulnerable adults. - All staff are aware of the Gambling Commission definition of vulnerable persons, it being "it will, for regulatory purposes, assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs". - Silvertime are aware of child truancy during school times, i.e. being aware that: a. Children should not be in the premises. b. The school day is between 0830 - 1530 and staff should be extra vigilant during these periods. Currently there is no issue with this, should there be then we will engage with local schools. - Management controls will be

		- St Johns Community Centre, Crawford Avenue, HA0 2HX (0.5 miles) - Young Brent Foundation, 660 Harrow Road, HA0 2HB (0.8 miles) - Wembley Scout Group, 86 Station Grove, HA0 4AN (0.5 miles) Student Accommodation facilities within a 1 mile radius of the premises: - Sterling Court, Lakeside, HA9 0BU (0.7 miles) - Grand Felda House, Empire Way, HA9 0EF (0.8 miles) - Unite students Olympic Way, 23 Olympic Way, HA9 0FR (0.9 miles) - Unite Students Arch View , First View, HA9 0JD (1 mile) - Pavilion Court, 20 First Way, HA9 0PE (1 mile) Facilities for the homeless (including hostels) and potentially vulnerable persons are located at: - SNG, 22 Wembley Park Blvd, HA9 0HP (0.7 miles) - The Shelter Scheme, , 8-18 Preston Road, HA9 8JG (0.7 miles) - Brent Housing Project, Engineers Way, HA9 0FJ (0.8 miles) Care Homes including but not limited to within 1 mile are: - Park Lane Residential Home, 52 Park Lane, HA9 7RZ (0.3 miles) - Beechwood Care Home, Napier Road, HA0 4UA (0.4 miles) - Care with Hope, 55 Castleton Avenue, HA9 7QE (0.6 miles) - Coplands Care Home, 1 Copland Avenue, HA0 2EN (0.6 miles) - Willow House, Victoria Court, HA9 6QN (0.7 miles) Places of worship: - The Potter's House Church Wembley, First Floor, 397 High Rd, Wembley HA9 6AA (0.03 miles)	- All public signage/documentation relating to age restrictions, gambling advice, gambling support information (e.g. GamCare or similar support service) is displayed or provided on the premises - A Challenge 25 proof of age scheme is operated at the premises whereby the only acceptable forms of identification are recognised photographic identification cards such as driving licence, passport, or proof of age card with the PASS hologram. (Brent Policy Para 8.2.3) - Third party testing by (Check Policy) on age restricted sales systems takes place by testing all working shifts on a regular basis. - There is a Silvertime Age Verification Policy, that stipulates the Challenge 25 Policy. It sets out the types of ID that are accepted should anyone be challenged. It also confirms there is a 'refusals log' and a third party testing regime in place (In line with Brent Policy Para 8.2.3). - Staff receive an acoustic alert on the opening and closing of the entrance door. - The total number of staff and licensed door supervisors is risk assessed to meet the needs of the LCCP conditions set for the venue (Brent Policy Para 4.23). - There is a policy to refuse entry	implemented to ensure that staff are trained in relation to the risk indicators set out below: - Developing relationships between a child and an older person. - Children in the company of a group of older persons. - Children regularly attending premises and meeting with a number of different older persons, particularly where older persons may be facilitating gambling for children. - Children outside of licensed premises developing relationships with an older person, particularly an older person facilitating gambling for children. - Children leaving the locality of the premises with older persons, particularly with a group of older persons. - Children looking uncomfortable in the company of, or leaving with, older persons, particularly groups of older persons. ** Although obviously it is noted that our Premises is an over 18 premises only. - In addition and in line with the Brent policy, there are Safeguarding Policies and Procedures for both Adults and for Children. Silvertime has a Safeguarding Adults Policy and Procedure document. This policy focuses on ensuring the processes are put in place to keep adults safe. The policy also directs staff on how to respond, what needs to be recorded and when matters should be reported internally and externally.
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		- Park Lane Methodist Church, Park Ln, Wembley HA9 7SG (0.2 miles) - Spiritualist Church, 1 Elm Rd, Wembley HA9 7JA (0.2 miles) - ICGC Royal Life Centre, Ark Elvin Academy, Cecil Ave, Wembley HA9 7DU (0.2 miles) - St Joseph's Catholic Church, 339 High Rd, Wembley HA9 6AG (0.3 miles) - Shiv Shakti Maa Meldi Temple, 594 High Rd, Wembley HA0 2AF (0.3 miles) - Wembley Muslim Cntr, 3 Lancelot Rd, Wembley HA0 2AL (0.3 miles) - Church Of God in Wembley, Cedar Hall, Station Grove, Wembley HA0 4AR (0.3 miles) - TruthVine Church, 33 Wembley Hill Rd, Wembley HA9 8AS (0.4 miles) - Central Mosque Wembley, 35 Ealing Rd, Wembley HA0 4AE (0.4 miles) - Shirdi Sai Baba Temple Wembley, Union Rd, Unionhall, Wembley HA0 4AU (0.4 miles) - London Nadarajar Temple, 3C Ranelagh Rd, Wembley HA0 4TW (0.4 miles) - Eelapatheeswarar Aalayam, Pavitt Hall, Union Rd, Wembley HA0 4AU (0.4 miles) - St John the Evangelist, 3 Crawford Ave, Wembley HA0 2HX (0.5 miles) - St John's Community Centre, 1 Crawford Ave, Wembley HA0 2HX (0.5 miles) - Masjid, Wembley HA9 0RJ (0.5 miles) - St Augustine's Church, Wembley Park, 152 Wembley Hill Rd, Wembley HA9 8EW (0.6 miles) - The Church of Jesus Christ of Latter-day Saints, 44 Wembley Park Dr, Wembley HA9 8HA (0.6 miles) - Hindu Priest Dipak Bhatt, 30 Talbot Rd, London HA0 4UE (0.6 miles) - Ealing Road Methodist Church, 85 Ealing Rd, Wembley HA0 4TL (0.6 miles) - Faizan-e-Madinah Wembley Dawat-e-Islami, 8-10 Forty Ave, London HA9 8JW (0.7 miles)	to customers who appear to be under the influence of alcohol or drugs. - We ensure that the customer toilets are checked every hour for evidence of drug taking. These toilet checks are documented stating the time and member of staff who made the checks. Access to the toilet is controlled by staff. - Prominent GamCare documentation is displayed at the premises. - Induction and refresher training is undertaken by every member of staff at least every 12 months. The training includes drug and alcohol awareness training to include homeless and street drinking. This training is formally recorded on each member of staff's training record, which again is available for presentation to the Licensing Authority immediately upon request. - As there is a PSPO in place, as an operator we take all responsible steps to prevent street drinking of alcohol outside the premises and ban from the premises those who do so. - Any tea/coffee drinks facilities will be provided for playing customers only. - All seating within the premises is weighted. - No customers are allowed to leave bags or other belongings in	
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		- Wembley Park United Reformed Church, The Broadway, East Ln, Wembley HA9 7NN (0.7 miles) - New Life Christian Centre International, Tokyngton Community Centre, St. Michaels Ave, Wembley HA9 6SA (0.8 miles) - Prayer room, 11 Exhibition Way, Wembley Park, Wembley HA9 0FA (0.8 miles) - Ahle Sunnah Mosque, Wembley HA0 4JF (0.8 miles) - Shiv Temple, Shree Sanatan Hindu Mandir, Wembley HA0 4TA (0.9 miles) - Muslim Prayer Space, 100 Hirst Cres, Wembley HA9 7HH (0.9 miles) - Shri Sanatan Hindu Mandir, Ealing Rd, Wembley HA0 4TA (0.9 miles) - V2V Community Church, Hirst Hall, Tower Ln, East Ln, Wembley HA9 7NB (1 mile) - Islamic Cultural Centre (Monks Park Masjid), 72-74 Harrow Rd, Wembley HA9 6PL (1 mile) Awareness of gambling care agencies in the local area. - National Problem Gambling Clinic (6.8 miles) There are no facilities for problem gambling in the vicinity. Job centre/employment agencies in the close area: - Job Centre, 6 St. Johns Road, Town Centre, HA9 7JD - Capital Jobs, 49 Dagmar Avenue, HA9 8DQ (0.4 miles) - FM Workforce, Eagle Road, HA0 4SL (0.9 miles) - West Recruit, 1 Empire Way, HA9 0EW (0.9 miles) - Ingeus, 16 First Way, HA9 0AF (1 mile) Family Service Centres: - Salisbury Support 4 Autism, 69 Castleton	the premises. - In line with Brent Policy Para 4.4.1, the entrance to the premises has been carefully considered in order to assess age and potential vulnerability of any person wishing to enter the premises. - In line with Brent Policy Para 4.5.2 we have considered interaction with customers as a priority and therefore maintain good staffing levels, which is determined by being risk assessed. - As per Brent's Policy at Para 8.2.4, as gaming machines provide opportunities for solitary play and immediate pay-outs we understand that they are more likely to engender repetitive and excessive play. Particular regard via way of training is undertaken to deal with this to ensure that the vulnerable are protected from gambling related harm. - There is a notice displayed at the entrance to the premises stating that no person under the age of 18 years will be admitted to the premises (Brent Policy Para 4.4.2). - As an operator, we have a specific training program for staff to ensure that they are able to identify children and other vulnerable people to take appropriate action to be reasonably consistent with this objective, and to exclude them from the premises if required.	
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		Avenue, HA9 7QE (0.5 miles) There are no Drug and Alcohol Treatment Centres within a 1 mile radius of the premises. Alcohol Anonymous Meeting at Harrow (3.3 miles) Narcotics Anonymous meeting at The Soho Recovery Centre (8.3 miles) There is one Brent Housing Project within a 1 mile radius which is Brent Housing Partnership located 0.9 miles from the premises. There are no soup kitchens within the vicinity and one Foodbank (foodcycle) located 0.1 mile from the premises located at Methodist Church, Park Lane, HA9 7SG. Pay day loan shops: - H&T Pawnbrokers, 544 High Road, HA0 2AA (0.2 miles) ATMs and Banks: - Nationwide Building Society, New Oxford House, 470 High Rd, Wembley HA9 7BE (0.05 miles) - Halifax, 427 High Rd, Middlesex HA9 7AB (0.06 miles) - Tesco Bank ATM, TESCO EXPRESS WEMBLEY, GREATER, London HA9 7BN (0.09 miles) - Barclays Bank, 506 High Rd, Wembley HA9 7BP (0.1 mile) - Santander, 514 High Rd, Wembley HA9 7BT (0.1 mile) - ATM, 520 High Rd, Wembley HA9 7BZ (0.1 mile) - Natwest Wembley, 520 High Rd, Wembley HA9 7BZ (0.1 mile) - Lloyds Bank, 564-568 High Rd, Middlesex HA0 2AB (0.2 miles) - HSBC Wembley, 584 High Rd, Wembley HA0 2DB (0.3 miles)	- The frontage, layout, lighting and fitting out of the premises has been designed so as to not attract children or other vulnerable persons. The frontage is blue with the silver Silvertime signage, and the interior is laid out in line with the following policies: Staff Line of Sight Policy, so that issues such as line of sight and the like are paramount. - In relation to promotional/advertising material, it is designed to ensure that it doesn't encourage young people or children or vulnerable persons. As set out in the Silvertime Advertising Policy (Brent Policy Para 4.4.1).	
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		- ATM (Post Office), 325 Harrow Rd, Wembley HA9 6BA (0.3 miles) - Tesco Bank ATM, Central, Tesco Metro Wembley, High Rd, London HA9 7AF (0.4 miles) - ICICI Bank UK, 47 Ealing Rd, Wembley HA0 4BA (0.5 miles) - Tesco Bank ATM, Tesco Express, Empire Way, London HA9 0EW (0.5 miles) - Punjab National Bank, 66C Ealing Rd, Wembley HA0 4TH (0.7 miles) - ATM (Post Office), 200 Ealing Rd, Wembley HA0 4QG (0.8 miles) - Sainsbury's Bank Cash Machine (ATM), 7-9 Exhibition Way, Wembley Park, Wembley HA9 0FA (0.8 miles) - Tesco ATM, 3 Williams Way, Wembley HA0 2FP (1 mile) - Euronet ATM, 9 Olympic Way, London HA9 0NP (1 mile) Local Alcohol Licensing Premises: - VIP Lounge, 546, High Road, Wembley HA0 2AA (0.2 miles) - Masti Club, 576-582 High Road, Wembley HA0 2AA - Wetherspoon, 397 High Road, Wembley HA9 6AA - The Robin, 397a High Rd, Wembley, HA9 6AA Gambling premises: - Betfred, 458 High Rd, Harrow, Wembley HA9 7AY (0.02 miles) - Paddy Power, 389 High Rd, Wembley HA9 2AA (0.05 miles) - MERKUR Slots - Wembley, 478 High Rd, Wembley HA9 7BH (0.06 miles) - Jennings Bet, 429 High Rd, Wembley HA9 7AB (0.07 miles) - Silver Time, 509 High Rd, Wembley HA0 2DH (0.2 miles) - Gr8odds, 558 High Rd, Wembley HA0 2AA (0.2 miles)		
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		- Coral, 576, Middlesex, 582 High Rd, Wembley HA0 2AA (0.3 miles) - William Hill, 6 Neeld Cres, Wembley Hill Rd, Wembley HA9 6QU (0.3 miles) - William Hill, 153 Harrow Rd, Wembley HA9 6DN (0.8 miles) - Coral, Middlesex, 86 East Ln, Wembley HA0 3NJ (0.9 miles) - Betfred, 147 Wembley Park Dr, Wembley Park, Wembley HA9 8HQ (0.9 miles) - Ladbroke, 240, 240a Ealing Rd, Wembley HA0 4QL (0.9 miles) - William Hill, 2/3, Heather Park Parade, 2/3 Heather Park Dr, Wembley HA0 1SL (1 mile) - Ladbroke, Middlesex, 86 East Ln, Wembley HA0 3NJ (1 mile) Bus stops and transport: - Park Lane, Bus Stop CL (0.03 miles) - Wembley High Road, Bus Stop SH (0.06 miles) - Ark Elvin Academy / Park Lane, Bus Stop SG (0.06 miles) - Ark Elvin Academy / Park Lane Bus Stop (0.07 miles) - Wembley High Road Station (0.09 miles) - Wembley Central Station, Bus Stop CM (0.1 mile) - Wembley Central Station, Bus Stop CN (0.1 mile) - Cecil Avenue, Bus Stop SP (0.2 miles) - Wembley Central Train Station (0.2 miles) - Wembley Triangle, Bus Stop SM (0.2 miles) - Wembley Central Station, Bus Stop CS (0.2 miles) - Cecil Avenue, Bus Stop SE (0.2 miles) - Wembley Triangle, Bus Stop SC (0.2 miles) - Wembley Central Station, Bus Stop CT (0.2 miles) - High Road Wembley, Bus Stop CV (0.3 miles) - Dagmar Avenue, Bus Stop D (0.3 miles) - Wembley Central Station, Bus Stop CP (0.3 miles) - Wembley Stadium Bus Stop (0.4 miles)		
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Local Area Risk Assessment - 446 High Road & 8 Park Lane

		- Wembley Stadium, Bus Stop SA (0.4 miles) - Wembley Stadium Train Station (0.4 miles) - North Wembley, East Ln, Wembley HA9 7NT (0.9 miles) - Wembley Park Underground Station (1 mile) This premises is situated in an area where high levels of customers do not speak English as their first language.		
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2.2	Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime	The Metropolitan Police crime data dashboard reveals over a one year period (December 24 to November 25) 2842 crimes were reported in the Wembley Hill ward. The highest reported crimes were Violence and sexual offences, anti-social behavior and theft from the person. Over the same period a total of 32,961 crimes were reported across the borough. The highest reported crime within the borough is violence against the person with 9 thousand + reports, followed by theft and drug offences. Reported crimes linked to High Road, Wembley within the vicinity of this premises mainly consist of shoplifting and theft against the person. The premises is located near to a Primark, Boots, TK Maxx, Poundland, shoezone and other high street stores. The crime data reflects the types of crime you would expect to encounter on a busy shopping street, however, none of these crimes are particularly linked with gambling premises.	- The CCTV system records continually whilst the premises is open for licensable activities and during all times when customers remain on the premises. It covers the gaming area, office and toilet entrance. All recordings are stored for a minimum of 31 days, with a date and time stamp. Recordings are made available immediately upon request to the Police or authorised officer throughout the entire 31 day period, (as per the Silvertime CCTV cameras, recordings and retention policy). - There is a staff member who is conversant with the operation of the CCTV on the premises at all times when it is open. - Silvertime employ the services of an external SIA door supervisor company for all its venues. The hours that the SIA door supervisor is employed is risk assessed (Brent Policy Para 4.23). - There is a policy of banning any customers who engage in crime and disorder within or outside the premises. - As there is a PSPO in place, there is a policy to refuse entry to customers who appear to be under the influence of alcohol or drugs - There are intruder alarms on the premises. These include maintained fixed panic buttons and additional portable panic buttons which are worn by all staff (PL Cond 25). - We ensure that the customer toilets	- There is a Silvertime Counter Policy, that covers: a. The Customer Service Counter is positioned deliberately in a part of the venue that maximises customer viewing and total line of sight to the entrance/exit. Any area out of sight from the desk is covered by CCTV to offer a complete view of the venue. b. The Counter is not a cash desk in the traditional style, it is a 'Customer Service Counter'. This is due to our use of cash recyclers/change machines that are located on the floor within clear view of the desk. Furthermore, only a minimal amount of cash (£200) is required to be handled by staff at the 'Cashier Counter' and this is locked away. There are no safes within the desk area. In turn this minimises the risk of crime, theft etc. c. The design is open at the top for ease when communicating with customers. It is made from a hardwood construction. There is a single entrance/exit to the side. d. There is a Silvertime - Cashier Counters Policy. e. In relation to staffing levels, due to the staff operating method there is not specifically a requirement for a member of staff to be permanently situated at the counter.
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			are checked every hour for evidence of drug taking. These toilet checks are documented stating the time and member of staff who made the checks. Access to the toilet is controlled by staff. - Induction training is provided to all staff working at the premises and refresher training to every member of staff at least every six months. This training includes: a. the specific local risk to the licensing objectives that have been identified for these premises within this LARA; b. drug and alcohol awareness training to include homeless and street drinking; c. conflict management training provided by an instructor qualified to formally recognise national or equivalent standard on dealing with conflict. - This staff training is recorded formally for each member of staff in their training records, and is available for presentation to the licensing authority immediately upon request - As there is a PSPO in place, Silvertime take all reasonable steps to prevent street drinking of alcohol directly outside the premises, and ban those from the premises who try to do so. - Signage is placed via a notice that is 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.	f. Full HD CCTV coverage of the whole premises can be viewed from the Customer Service Desk, as well as, the main office. The system retains recordings for 31 days. All staff are trained in its use and this is detailed in the staff training log. g. In terms of 'Cash Handling', cash is not stocked at the desk. However, there is a need to restock the cash recyclers. This is carried out when the venue doors are closed to the public. h. There is a lockable room which is a staff safe haven, with CCTV for full viewing of the premise and offers various communication capabilities. Static panic alarms are positioned at the desk and in the office. Staff have to wear a personal alarm at all times when on duty. i. All staff will be trained on this - Silvertime Counter Policy to ensure safe and compliant operation of the Customer Service Counter. - There is a Silvertime CCTV Policy. This policy covers: a. Sufficient coverage, as CCTV system is designed to cover the whole floor, all entrances, exits, entrance to toilets, the office and outside the venue. b. CCTV footage can be accessed locally or remotely. A written log is kept detailing any
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				occurrences that require further investigation. c. All staff of the level of assistant manager and above are trained to be capable of using the system to the requirements of the authorities. d. Footage is retained for 31 days and held on a hard drive. Recordings of the CCTV will be provided to Police Enforcement Officers or authorised persons on request. e. The CCTV system is checked regularly by management and serviced by a third party on a bi-annual basis. – Silvertime Staff Line of Sight Policy covers: a. The machine layout follows the perimeter of the venue to allow for enhanced customer visibility for staff and when viewing from CCTV. This includes the entrance/exit to the front and the emergency exit to the rear (Brent Policy Para 4.4.2). b. All areas of the venue are covered by the CCTV to allow viewing of machines when required. This considers any potential blind spots around the structural pillars. c. Gaming Machines are not set out in a way to create blind spots and information signage is not covered by the position of the machines.
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				- Silvertime Gaming Machines Policy covers: a. As per the Silvertime Line of sight policy, Gaming Machines are located around the perimeter of the premises to ensure that they are sufficiently monitored at all times, either by direct line of sight or CCTV coverage. b. Cash can go into a gaming machine, but it cannot come out. This is due to the TITO (Tickets in, Tickets out) system employed on all machines. This is to minimise risk of crime. c. Machines are not set out in a way to create blind spots and information signage is not covered by the position of the machines. d. There is a robust Age verification policy in place. Although it is noted that higher category machines should be and are in a separate area, we would advise it is difficult to identify a higher category B3 machine to a lower category C as they look very similar. e. As an operator we are mindful that on occasion customers may lose control of their gambling which can lead to criminal damage, as such the premises licence the premises has weighted stools. Should any issues arise there will be clear lines of communication with the local Police. There is a relationship with local police, who regularly 'drop in'.
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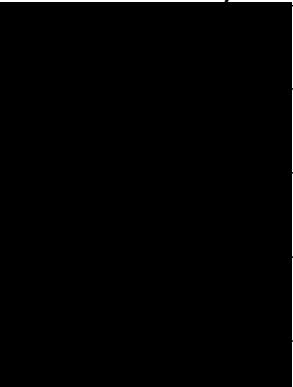
				- Silvertime Staff Safety & Alarm Measures Policy covers: a. Stationary panic alarms are located on the Customer Service Desk and in the office on the ground floor. b. When staff are roaming the floor away from the stationary locations of panic alarms, they are obliged to wear a personal panic attack alarm. c. All staff have certified Conflict Management Training as detailed in the staff training log and on their HR portal. This Conflict Management Training is carried out annually. d. There is a lockable room that is a safe haven location for staff in a situation of emergency. HD CCTV monitor is also located here to allow for floor viewing. In addition, there is a landline telephone located at the Customer Service Desk. - Silvertime External Shop and Forecourt Management Policy covers: a. In terms of entrance and egress points, we have a single entry/exit that is covered by CCTV therefore viewed by staff inside and with a spot monitor. Signs in the windows are displayed in English, which advise of house rules and note consumption of alcohol outside the entrance will result in no admittance.
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				b. In addition, we will refuse entry to customers who appear to be under the influence of alcohol or drugs. Any person believed to be street drinking alcohol directly outside the premises will be banned from the premises. Any person suspected of engaging in crime and disorder in the immediate vicinity of the premises will also be banned. c. There is a developed relationship with the police local safe neighbourhood teams.
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2.3	Ensuring that gambling is conducted in a fair and open way		- Terms and conditions signage is displayed. - Betting and game rules signage is displayed at the premises. - All notices regarding gambling advice or support information are displayed. - All staff are trained with the BACTA codes of practice. - Staff are aware of the Silvertime terms and conditions, and relevant game rules associated with all gaming machines offered on the premises. - Customer complaint forms are available on request at the Support Desk. Staff are trained in the Silvertime complaints procedure. - As an operator, we acknowledge that this licensing objective has a direct link with the successful achievement of the crime and disorder objective. - In terms of advertising, all advertising codes are adhered to in order to stop customers from being misled. - There is a Silvertime Advertising Policy to cover this. - All machines are purchased from manufactures/suppliers licensed by the Gambling Commission. - Machines are maintained by qualified engineers.	- Silvertime take staffing levels very seriously. Levels of staff are risk assessed. - This is to ensure that the entire premises is being monitored, including the monitoring of all gaming machines and entrances - Silvertime Advertising & Merchandise Policy covers: a. The venue windows display screens that feature content of games available inside. All content displayed is produced by Gambling Commission recognised and regulated companies that are subjected to LCCP criteria and therefore must be designed and worded in a way not to attract children to gamble (Brent Policy Para 4.4.1.). All content displayed is checked and verified by our managers to ensure its appropriateness. We recognise the main advertising elements of concern and as detailed by the ASA & CAP are those that may be considered of interest to children, young persons and/or the vulnerable. - Silvertime Provision of Gambling Harm Prevention Advice Policy covers elements raised in Brent Policy 8.2.3 namely: a. Silvertime/Gamcare gambling advice brochures are available throughout the premises (including at the Customer Service Counter, gaming machines and a discreet location) Additionally, A4
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			- Machines are turned off should a fault occur. - Silvertime is Registered with ADR Entity – IBAS.	posters have been produced and displayed in English. b. To assist customers monitor or control their gambling, timer clocks are available for customers to use. In addition, some machines have inbuilt timer/spend limit devices built in by manufacturers. There is also the self- exclusion policy.
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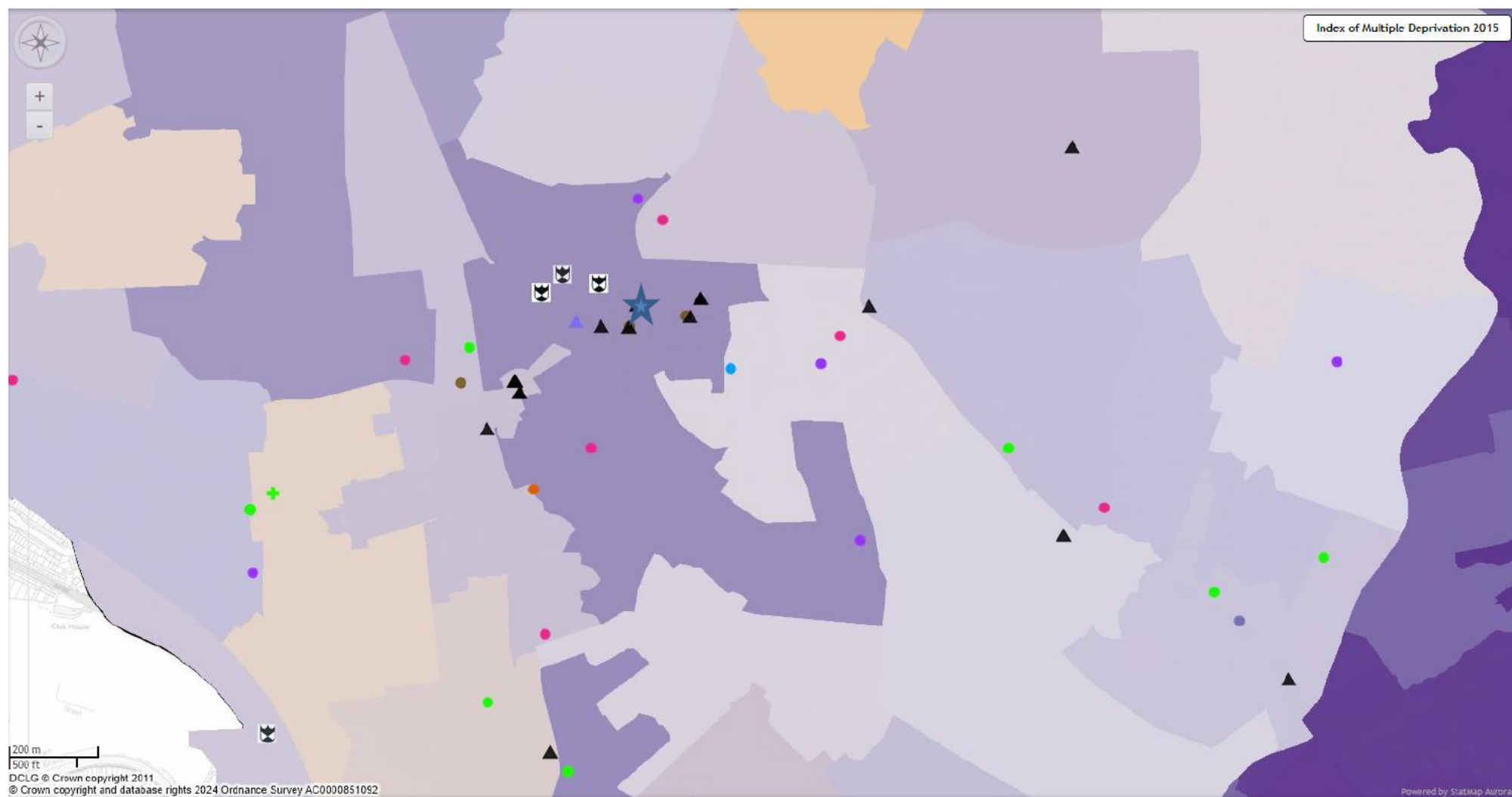
Action Plan - Please note that all actions have been undertaken when the LARA was updated in March 2026.						
Local Area (insert number)	Gambling Operation and Physical Design (insert number)	Question	Action Required	By Whom (name)	By When (date)	Date Completed

Assessment Review			
Frequency of Review (enter time period e.g. 12 months)	Every year or major change in the legislation.	Date Review Due	3 March 2027
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
	Premises Manager		12 September 2024
	Premises Manager		02 October 2024
	Premises Manager		7 January 2025
	Premises Manager		14 February 2025
	Premises Manager		3 March 2026

Local Area Profile for Gambling Risk within Brent analysis



Index of Multiple Deprivation 2015:



▼ Gambling Principles

- ▲ Gambling Premises 2023
- 🏠 Licensed Premises
- ▲ Job Centres
- ☞ Banks and Building Societies
 - Bank
 - Building Society
- ☞ Schools
 - All through
 - Secondary
 - Primary
 - Nursery
 - Not applicable
- ☞ Places of Worship
 - Church
 - Mosque
 - Temple
 - Other Place of Worship
- ☞ Payday loans
 - Cash Converter
 - Money Transfer / Courier
 - Pawnbroker
- ☞ Housing
 - 🏠 Supported Accommodation
 - 🏠 Emergency Accommodation Properties
- ☞ Health
 - ➕ GP Hubs
 - GP Practices
 - 🏠 Brent Drug & Alcohol Recovery services

Public Spaces Protection Orders in Brent



Public Spaces Protection Orders in Brent

Hide panel

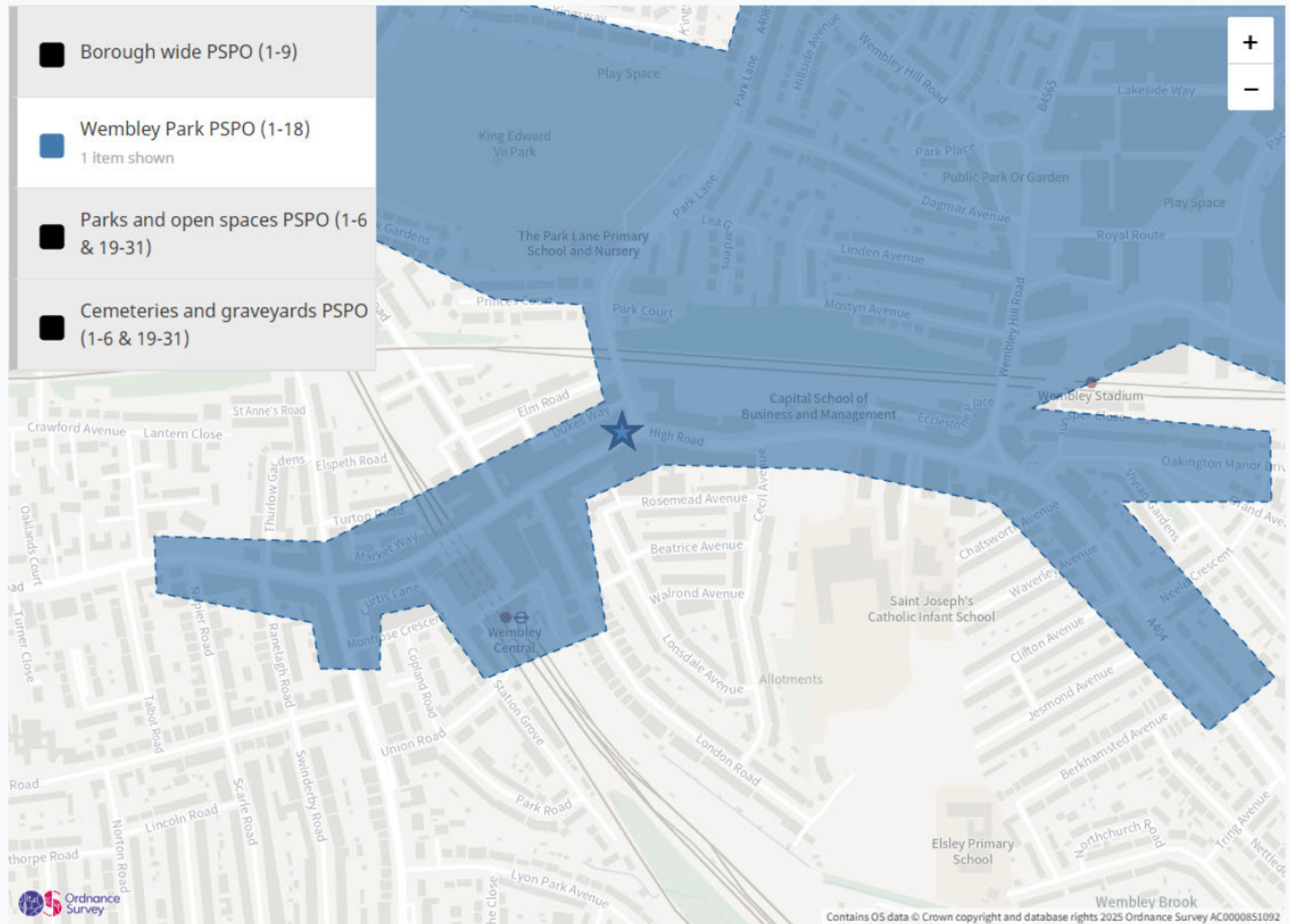
Clear map

Borough wide PSPO (1-9)

Wembley Park PSPO (1-18)
1 item shown

Parks and open spaces PSPO (1-6 & 19-31)

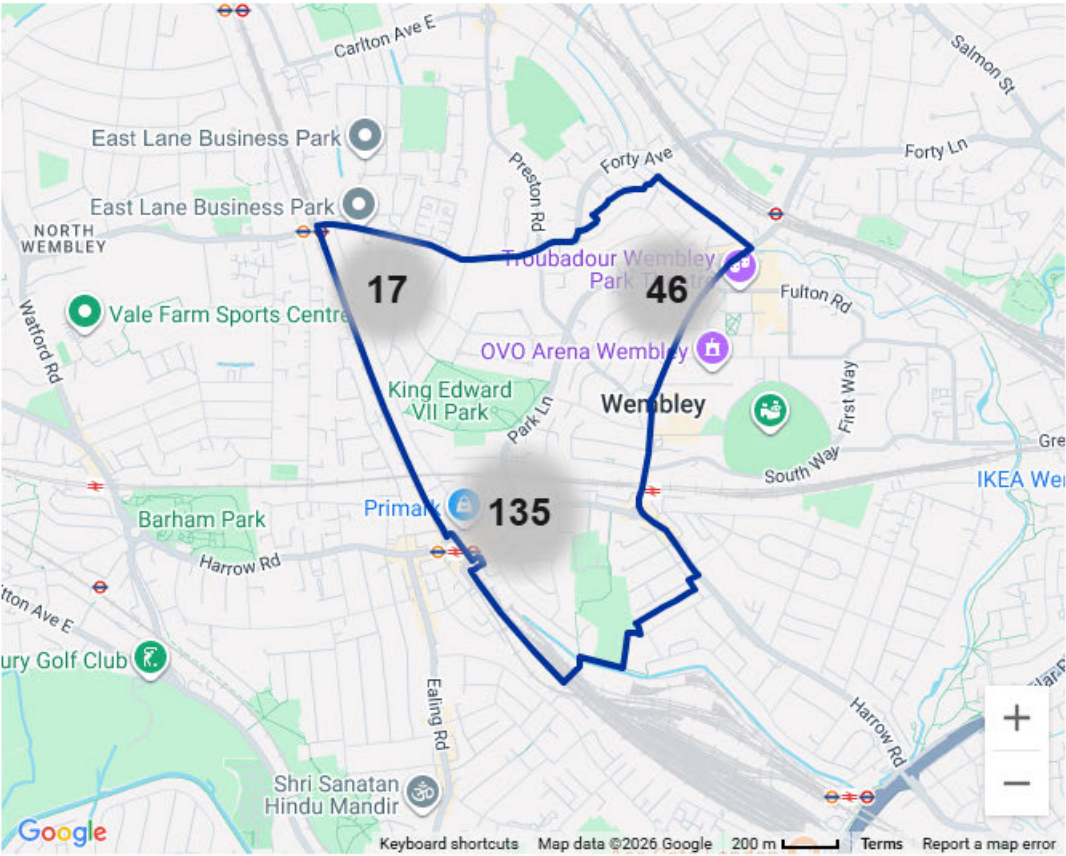
Cemeteries and graveyards PSPO (1-6 & 19-31)



Appendix 3

Ward Area Map Wembley Hill - Metropolitan Police Data Feed Example Map.

Click on a hotspot to see more details. Alternatively, [view as A-Z list](#).



Crime type and time period title

All Crimes (198)

November 2025

198 crimes were reported here in November 2025	
Anti-social behaviour	44
Violence and sexual offences	43
Shoplifting	25
All other crime	86

About this crime map

This map uses data from local forces. The hotspots give only a loose idea of where crimes happened. Actual locations and details of crimes are kept anonymous.

Please note that not all crimes that occurred can be shown on the map.

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Appendix 4 - Gambling Premises within a 300m radius



	Premises 446 High Road, Wembley, HA9 6AH & 8 Park Lane, Wembley, HA9 7RP
	Betfred , 458 High Rd, Harrow, Wembley HA9 7AY (40m)
	Paddy Power , 389 High Rd, Wembley HA9 2AA (80m)
	MERKUR Slots , 478 High Rd, Wembley HA9 7BH (90m)
	Jennings Bet , 429 High Rd, Wembley HA9 7AB (120m)

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To: Brent Licensing Authority

Re: Representation objecting to application for an Adult Gaming Centre Premises
Licence under the Gambling Act 2005

Applicant: Silvertime Amusements Limited

Premises: Silvertime Amusements, 446 High Road & 8 Park Lane, Wembley, HA9 6AH

We write to object to the application by Silvertime Amusements Limited for an Adult Gaming Centre (AGC) at 446 High Road and 8 Park Lane, HA9 6AH. The applicant currently operates under a Bingo license at 446 High Road, with the existing Bingo licence understood to be surrendered should the new AGC licence be granted. This representation is made on the basis that granting this application would not be consistent with the licensing objectives under the Gambling Act 2005, namely:

- preventing gambling from being a source of crime or disorder
- ensuring gambling is conducted in a fair and open way
- protecting children and other vulnerable persons from being harmed or exploited by gambling

To give some background, Brent is already disproportionately affected by gambling-related harms and granting Silvertime a new AGC premises licence could compound this. Brent's Joint Strategic Needs Assessment (JSNA) on Gambling (2023) highlights that Brent not only has one of the highest numbers of gambling premises in London and the country, but that it is also among the areas with the highest number of people experiencing the most severe consequences from gambling. Using the Problem Gambling Severity Index (PGSI), a common scale used in many official surveys on gambling, the JSNA reported that 17.1% of residents were considered to be gambling with at least a low-level of risk (vs 13.4% in the rest of the country), while 6.2% were considered to be gambling with the highest level of risk - more than twice the national average of 2.9%. Latest figures since then show that those in Brent continue to experience a disproportionate level of harm, recording a much steeper rise in 'at-risk' gambling than the national average. While national levels of 'at-risk' gambling have risen only marginally (13.4% to 14.7%), Brent has experienced a marked increase from 17.1% to 24.9%. This divergence occurring in a borough characterised by its high concentration of land-based gambling premises suggests a local environment with heightened exposure to harm.

The granting of this licence would extend the applicant's existing premises on Wembley High Road into the adjoining premises at 8 Park Lane, with both addresses located within the Wembley Hill ward. The proposed application would licence the expanded premises as an Adult Gaming Centre, establishing gaming-machine gambling as its primary licensed activity and removing the requirement for substantive bingo provision. Given the existing concentration of gambling premises in the area and the heightened vulnerability

to gambling-related harm, which we outline in greater detail below, we have significant concerns about expanding dedicated gaming-machine gambling provision at this location. We set out below why we consider the application to be inconsistent with the licensing objectives.

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

According to CrimeRadar data, 8,441 crimes were recorded within the surrounding area over the last 12 months, giving the area a safety score of only 8/100. The five most commonly recorded crime types included 'violent crimes', 'anti-social behaviour', 'shoplifting', 'theft from person', and 'other theft'. This existing level of crime and disorder is relevant when considering the potential risks associated with expanding gambling provision at this location. As Brent's JSNA highlights, there is evidence of an association between criminal activity and gambling behaviour. This is especially the case for crimes such as theft or fraud, where gambling has been found to be an underlying motivation for offending, while gambling-related harm can also contribute to violent interpersonal crimes like domestic abuse.

Unfortunately, the relationship between gambling and crime is not always readily identifiable in routinely collected crime data. Where offending is connected to gambling, the underlying gambling-related motivation or harm may not be recorded, particularly as gambling is not routinely identified or screened for in these types of assessments. As a result, available crime statistics may not fully capture the extent to which gambling contributes to or intersects with offending. Nevertheless, the local crime profile data shows an overlap between some of the offences most commonly associated with gambling-related harm and those most commonly recorded in Wembley.

Qualitative evidence from Brent residents also describes experiences of disorder in and around gambling premises. Residents have described groups congregating and drinking outside gambling premises alongside other forms of anti-social behaviour. Such experiences illustrate the type of lower-level disorder that may affect residents' perceptions and experiences of their local environment without necessarily resulting in an official report to the police. Importantly, residents describe these experiences even where premises have been recorded as compliant with their existing licensing requirements.

2. Ensuring that gambling is conducted in a fair and open way

The licensing objective of ensuring that gambling is conducted in a fair and open way concerns the fairness and transparency of the gambling offered to customers. This includes whether relevant information is presented clearly and transparently, enabling

customers to understand the gambling in which they are participating and make informed decisions. The Social Market Foundation's report, *High Streets at Stake*, raises concerns within the AGC sector, including evidence relating to the presentation of information to customers and practices concerning compliance with statutory machine ratios. The report concludes that the operation of AGCs raises questions under the 'fair and open' licensing objective.

While the applicant demonstrates some understanding of its customer base and states that multilingual resources will be available for providing safer gambling advice and information on support services, it is not clear from the application whether equivalent consideration has been given to ensuring that information about the rules and terms and conditions of the gambling offered are equally accessible and clearly presented. Should a licence be granted, we would expect key information relevant to customers' participation to be clearly and accessibly presented at the point of play, rather than being available only as supplementary information that customers must seek out.

3. Protecting children and other vulnerable people from being harmed or exploited by gambling

"Gambling felt like something I could lean on when things went wrong."

Student

Brent is the fourth most deprived borough in London, with a younger-than-average and highly ethnically diverse population. This demographic profile means Brent is home to a high concentration of population groups known to be at greater risk of gambling-related harm. These vulnerabilities are particularly relevant to Wembley and therefore to this application. The applicant's own LARA identifies the locality as one of the more ethnically diverse parts of the borough and as having a relatively young population, with residents predominantly aged between 20-39. This is significant given evidence that:

- 21% of 18–24 year olds are classed as "at-risk" gamblers, compared to 10% of those aged 55–64
- 10.6% of people from minority ethnic groups are considered to be 'problem gamblers', compared with 3% of white groups

Our strongest objection to this application is that granting the AGC premises license would be inconsistent with the licensing objective of protecting children and other vulnerable persons from being harmed or exploited by gambling. While gambling-related harm can affect anyone, the evidence consistently shows that harm is not equally distributed and tends to fall disproportionately on groups already experiencing greater

vulnerability and disadvantage. In fact, research shows that the groups least likely to gamble overall often experience some of the most severe harms if they do gamble.

The applicant is seeking an AGC premises licences covering 446 High Road and the adjoining 8 Park Lane. Its LARA states that gambling premises form part of the wider mix of town-centre commercial uses, rather than constituting a dominant or clustered feature, and that these premises are well dispersed across the locality.

However, this characterisation does not appear to reflect the high availability and close proximity of gambling premises in the vicinity of the proposed venue, nor does it reflect the perceptions of residents. The existing Silvertime premises sits within Wembley Hill ward, which currently hosts seven licensed gambling premises, placing it among the wards with the highest numbers of gambling premises in the borough. Wembley High Road also extends into Wembley Central ward which has a further six licensed gambling premises, five of which are situated on the same High Road as the existing site. Three of these premises are currently licensed to Silvertime Amusements Limited. This means that on this High Road, there are 10 licensed places to gamble within a 0.3miles stretch, equivalent to around a 7-minute walk according to Google Maps. Of these 10, four are licensed as Adult Gaming Centres and six as betting shops. One of the AGCs was granted a premises licence only recently and appears not yet to have opened. The existing Silvertime premises seeking a new AGC licence at 446 High Road is itself less than 500 feet from another Adult Gaming Centre.

Research suggests that accessibility, proximity and concentration of gambling opportunities can be relevant to the risk of gambling-related harm. Evidence examining the geographical distribution of gambling premises has identified relationships between gambling behaviour and proximity to gambling venues. For example, studies have found:

- People living closer to gambling venues (less than 0.7km away) are twice as likely to be ‘problem gamblers’ than individuals living further away (more than 3.1km away)
 - This is particularly relevant to the proposed location, as the applicant’s own LARA identifies residential properties directly above the premises
 - This should also be considered alongside the wider availability of gambling in the locality, with at least 10 licensed premises already located along a 0.3miles (0.48km) stretch, well within the 0.7km described in the research as “closer”
- Among young people aged 18-21 encountering gambling problems rather than never, gambling has been found to increase by 39% for each additional form of gambling operator located within their local area

- This finding is particularly pertinent given the applicant's own identification of the locality having a predominantly young population and the presence of multiple gambling operators within a very short distance in this area
- Higher concentrations of gambling premises are associated with higher rates of 'problem gambling'
 - Brent's experience is consistent with this wider evidence, with a high concentration of land-based gambling provision coinciding with disproportionately high levels of 'at-risk' gambling
- Those living in more deprived areas are more likely to gamble on faster-paced games such as scratch cards and slot machines, which are known to be more addictive
 - The proposed premises are situated within an area of relatively high deprivation in Wembley. While this is not among the most deprived parts of Brent overall, the local deprivation profile nevertheless indicates socioeconomic vulnerability within the surrounding population
 - This is also directly relevant to the nature of the proposed premises, where the core gambling offer would be gaming machines, commonly referred to as slot machines

A significant emphasis is placed on staff training. The application states that staff will be trained to recognise signs of repetitive or excessive play but provides little detail on how these indicators would be assessed in practice or what patterns of play the operator would regard as excessive and requiring intervention. Similarly, staff are expected to identify changes in customers' pace of play, attention or responsiveness, without the application clearly setting out which types of changes would trigger intervention or escalation. Similar reliance on staff judgement is apparent in provisions referring to whether an individual "appears" to be under the influence, or to offering self-exclusion "to those that need it" or "if required". The difficulty is that, as set out above, an individual experiencing gambling-related harm may not necessarily display readily identifiable signs or even recognise themselves as needing support.

This reliance on staff awareness makes staffing levels and capacity to monitor customer behaviour particularly important. Although the application states that staffing levels will be risk-assessed and taken seriously, it does not appear to provide expected minimum staffing levels at different times or sufficient detail on the circumstances that would lead to increased staffing. This makes it difficult to assess how the proposed monitoring and intervention measures would operate in practice.

Other safeguards rely on signage and safer gambling information being available within the premises. These measures are valuable, but their effectiveness necessarily depends

to some extent on customers noticing, engaging with and acting upon that information. They therefore cannot be relied upon, particularly for individuals who have not yet recognised that their gambling is becoming harmful. There are similar limitations to age-related safeguards. Research published by the Social Market Foundation found that 27% of surveyed 14 to 17-year-olds said they knew another young person who had visited an AGC. This does not necessarily demonstrate that the proposed premises would fail to enforce age restrictions, but it does demonstrate that these safeguards are not always enough to prevent children and young people from entering.

More fundamentally, however, even robust premises-level safeguards cannot fully mitigate the wider cumulative risks identified throughout this representation. Conditions, staff training, customer interaction, self-exclusion and safer gambling information can reduce risks associated with the operation of an individual premises, but they cannot remove the wider effects associated with gambling-related harm. This is particularly important in Wembley where the proposed AGC would operate, given that the characteristics of the local area combine to create a heightened risk of gambling-related harm.

Furthermore, as the applicant acknowledges, the presence of multiple gambling premises along the High Road creates potential cumulative impact risks. The LARA identifies risks including anti-social behaviour, opportunistic crime and exposure of vulnerable individuals to gambling opportunities. However, it gives less consideration to the wider potential impacts, particularly on health, which premises' safeguarding measures cannot necessarily prevent.

Gambling is commonly described as a 'hidden addiction', as harmful behaviours can often develop gradually without any overt warning signs. Unlike alcohol and substance addictions, there may be few outward signs that an individual's gambling has become harmful. This makes prevention particularly important, including consideration of the normalisation and visibility of gambling within everyday environments. A high concentration of readily accessible gambling opportunities can contribute to perceptions of gambling as an ordinary and relatively risk-free activity. This presents a particular challenge for people who may already be experiencing harmful consequences from gambling but have not yet recognised it as a problem, as well as populations that may be particularly susceptible to its influence, including children and young people. For people already experiencing gambling-related harm, the ready availability and visibility of gambling can present an additional challenge.

Research published by the Social Market Foundation found that 44% of young people aged 14 to 17 agreed that the presence of gambling venues near where they live makes people their age more interested in gambling. This suggests that the impact of gambling

premises on children and young people is not limited to whether they are able to enter the premises or gamble themselves. Rather, their presence and visibility within the local environment may influence a young person's interest in gambling even where age-restriction and safeguarding measures are operating as intended. This is important when considering the mitigations proposed by the applicant. While the LARA sets out measures intended to ensure that promotional materials do not appeal to children or vulnerable persons, such measures cannot fully address this potential impact.

“You’ve got it in your face all the time – high road, on your phone, it’s everywhere. How do you overcome that when wherever you go, it’s right there, staring in your face?”

Peer Support Group Member to drug and alcohol service users in Brent

As the applicant acknowledges, the high concentration of gambling venues along the High Road creates the potential for cumulative impacts. This concern is heightened by the socioeconomic vulnerability present within the locality, as financial pressures can influence gambling behaviour and the reasons why some people gamble. Evidence cited in Brent's JSNA found that 37% of Citizens Advice advisers reported taking calls from people who had turned to gambling in the hope of improving their financial situation, while 19% reported cases where gambling was being used specifically in an attempt to meet essential costs, such as energy bills. GamCare advisers similarly reported experiences of callers receiving Universal Credit who viewed gambling as a potential means of generating additional income to meet basic living costs. Providing further opportunities to gamble may contribute to these existing vulnerabilities.

One of the most devastating ways in which gambling-related harms can manifest is through its impact on a person's mental health. This is particularly relevant in Brent, where estimated prevalence of common mental health conditions is higher than both the London and national averages (20.7% vs 19.3% vs 16.9% respectively). At the most severe end, gambling-related harm is associated with suicidal thoughts and suicide. Recent UK evidence continues to demonstrate the seriousness of this relationship. Research published in 2026 by the National Centre for Social Research found that 22% of people reporting high levels of gambling problems had attempted suicide during their lifetime, with two-thirds of those individuals linking their most recent attempt to gambling. The report also found that the risk of suicidality is highest among those who reported a combination of gaming and participating in 'other gambling,' reinforcing the importance of considering the cumulative availability of different gambling opportunities rather than individual premises types in isolation.

All this highlights the potential severity of gambling-related harm, how hidden and privately experienced these harms can be, and how they may develop without obvious

outward signs. This is particularly relevant in areas where existing vulnerabilities within the population are already elevated. While the applicant does acknowledge many of the potential risks to vulnerable people and proposes a wide range of safeguarding measures in response, many of these measures ultimately depend upon staff being able to recognise indicators of harm, exercise judgement about when intervention is required, or upon customers themselves engaging with the support available.

Summary

This objection is not to gambling in principle, but to the granting of new AGC premises licences in this particular area. The evidence set out above identifies a local environment in which multiple recognised vulnerabilities to gambling-related harm overlap, while the measures proposed by the applicant do not provide sufficient assurance that these risks would be adequately mitigated. We therefore consider that the applications should be refused on the basis that they are not reasonably consistent with the licensing objectives under the Gambling Act 2005.

Yours sincerely,

Ruth du Plessis

Interim Director of Public Health and Leisure

Email: Ruth.du-Plessis@Brent.gov.uk

Arisa Kimaram

Senior Insight Analyst

Email: arisa.kimaram@brent.gov.uk

Public Health

Brent Civic Centre

Wembley

HA9 0FJ

September 2026

OBJECTION TO PREMISES LICENCE APPLICATION

To: Licensing Authority, London Borough of Brent

Application Reference: 39394

Applicant: Silvertime Amusements Limited

Premises: 446 High Road & 8 Park Lane, Wembley, HA9 6AH

Proposed Use: Expanded Adult Gaming Centre (AGC)

Date: 24 September 2026

We are writing to register our strong objection to Silvertime Amusements Limited's application for an expanded Adult Gaming Centre premises licence spanning 446 High Road and expanding into 8 Park Lane, Wembley. This is an expansion of the existing adult gaming centre at 446 High Road into the former dry cleaners at 8 Park Lane, effectively doubling its footprint and high-frequency electronic gaming capacity.

Our objection is founded on two core licensing objectives set out in Section 1 of the Gambling Act 2005:

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime.

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

Wembley High Road is a busy town-centre shopping corridor which already faces severe socio-economic strain. Granting this licence will significantly scale up high-frequency electronic gaming in an area with acute local vulnerability and documented public safety challenges.

Wembley High Road Serves Residents Across Wembley, Including Wembley Park

It is important to recognise that Wembley High Road is not an isolated shopping parade serving only its immediate vicinity. It functions as a key town-centre corridor for residents across the wider Wembley area, including thousands of residents living in Wembley Park. Whilst Wembley Park has experienced significant redevelopment in recent years, many essential services remain concentrated on Wembley High Road. Residents regularly travel to the High Road to access banking facilities, Post Office services, chemists and a range of transport connections that are not available within Wembley Park itself.

The High Road also provides access to more affordable retailers and everyday shopping options than those typically found within Wembley Park's commercial spaces. Many Wembley Park residents rely on these businesses for day-to-day household purchases and groceries. In addition, numerous children and young people from Wembley Park attend schools and colleges located along or close to Wembley High Road, meaning the route is heavily used by families throughout the school day.

As a result, the impact of an expanded Adult Gaming Centre at this location would not be confined to residents of Wembley Central. The premises sits within a corridor used daily by families, schoolchildren, commuters, shoppers, and vulnerable residents from across Wembley, including Wembley Park. The Sub-Committee should therefore consider the broader community impact on the wider Wembley population that depends upon Wembley High Road as an essential centre for services, education, transport, and affordable retail provision.

This expanded Adult Gaming Centre (AGC) is an automated, self-service electronic gaming venue sited directly on the high street, designed to capture everyday pedestrian footfall. The proliferation and expansion of gambling establishments along Wembley High Street, compounded by the Alcohol and Entertainment Licensing Sub-Committee's recent approval of another adult gaming centre nearby at 574 High Road, are entirely transforming the character of the area from a retail high street into a gambling cluster.

This application seeks to take an existing high-street arcade at 446 High Road and absorb the adjacent retail unit at 8 Park Lane, materially enlarging the overall floorplate. Because statutory regulations permit up to 20% of the total machines in an AGC to be higher-stake Category B3 machines (with maximum stakes of £2 and jackpots up to £500), doubling the physical floor space allows the operator to significantly increase the overall volume of high-loss electronic terminals on site.

Placing a significantly expanded footprint of high-frequency gaming machines directly onto this busy town-centre corridor increases incidental exposure not only for local shoppers, but also for the many families, schoolchildren, commuters, and Wembley Park residents who rely on Wembley High Road for essential services, education, transport connections, banking facilities, postal services, chemists and affordable day-to-day shopping. The harms associated with this expansion would therefore be felt across a far wider community than the immediate vicinity of the premises.

The recent "gambling harms emergency" declared by Brent Council, a motion brought forward by the Brent Labour group and agreed unanimously across the council, recognises the acute public health impact, community safety risks, and rising inequality driven by high-street gambling saturation.

The Council Has the Power to Put Communities First: The Sheffield Decision

Licensing committees are frequently told by operators that national legislation obliges them to grant licences unless statutory authorities raise objections. This is incorrect.

In the 2025 Sheffield Magistrates' Court case (*Royal Amusements v Sheffield City Council*), District Judge Spruce firmly upheld a licensing authority's decision to refuse an AGC licence in a sensitive town-centre corridor. The judgment affirmed three vital principles:

Councils are the guardians of local harm: Local licensing authorities are statutorily responsible for safeguarding their communities from localized cumulative impact.

"Aim to permit" is not a blank cheque: The Section 153 presumption does not compel a council to grant a licence where doing so would clash with local risk assessments, codes of practice, or the licensing objectives.

Interior conditions cannot remedy exterior community harms: DJ Spruce held that standard venue conditions, such as CCTV, alarms, or staff training, cannot regulate or cure the invisible, far-reaching gambling harms that spill out beyond the venue's threshold into homes and streets.

Brent Council possesses clear statutory discretion to evaluate the real conditions of Wembley High Road and refuse this application.

1. Downplaying Crime in an Incident Hotspot

The applicant's Local Area Risk Assessment (LARA) fails to engage with the severe reality of crime along this corridor:

Concealing Official Crime Deprivation: Official Index of Multiple Deprivation (IMD) metrics show that the local LSOA (Brent 020G) is in the worst 8% of neighbourhoods nationally for crime (more deprived than 92% of English neighbourhoods) and the worst 4% across all of Brent. The applicant's narrative omits this acute ranking entirely.

Minimising Serious Street Violence: The applicant claims local crime "mainly consists of shoplifting and theft" and reflects normal high-street shopping. This brushes aside the severe violent incidents Wembley High Road has experienced in recent years, including multiple stabbings, armed police pursuits, and weapon recoveries directly along the parade.

Dismissing the Criminogenic Link: The LARA asserts that "none of these crimes are particularly linked with gambling premises". This contradicts published findings from the Howard League for Penal Reform's Commission on Crime and Problem Gambling, which document that gambling addiction directly drives acquisitive offences (theft, robbery, fraud) to fund escalating losses.

Superficial Interior Measures: Internal panic alarms and CCTV cannot mitigate street-level congregation, anti-social behaviour, or the localized crime risks associated with an expanded venue.

2. A Flawed, Outdated, and Slipshod Assessment

The application documentation contains procedural defects demonstrating a lack of genuine local engagement:

Unfinished Template Text: In two separate places (pages 6 and 19), the LARA states: "Third party testing by (Check Policy) on age restricted sales systems takes place...". Submitting unedited boilerplate text demonstrates that this risk assessment was generated from a corporate template rather than a diligent, site-specific investigation.

Reliance on 11-Year-Old Maps: Appendices 1 and 2 rely on 2015 Index of Multiple Deprivation maps rather than current data, contrary to the Gambling Commission's Social Responsibility Code requiring operators to assess present localized risks.

Selective Incomes vs. Real Deprivation: Citing a commercial property website (Crystal Roof) to claim average incomes are £54,200 obscures the community's structural vulnerability. Government statistics confirm that Brent 020G ranks in the worst 24% nationally for Child Income Deprivation (IDACI) and the worst 21% nationally for Older People Income Deprivation (IDAOPI).

3. Increasing Exposure to Children and Vulnerable Residents

Substantially enlarging this facility multiplies harm in an already over-saturated area:

Immediate Proximity to Children: The premises sits just 138 feet (42m) from Eliana Bilingual Nursery, 135 feet from London School of Science & Technology, and within 0.2 miles of both Ark Elvin Academy and Park Lane Primary School. Expanding the shopfront and entrance along this route normalises electronic gambling along daily school and nursery corridors.

Predatory Proximity to Emergency Foodbanks: The LARA records that Foodcycle Foodbank at Park Lane Methodist Church is only 0.1 miles away (around 160 metres), with pawnbrokers located within 0.2 miles. Increasing high-frequency gambling capacity next to emergency food support directly endangers residents in severe financial crisis.

Aggressive Gambling Saturation: The applicant claims venues are "well dispersed". In reality, their own Appendix 4 map shows an intense cluster: five gambling premises within 120 metres (Betfred at 40m, Paddy Power at 80m, MERKUR Slots at 90m, and Jennings Bet at 120m). Expanding into an adjoining unit worsens cumulative saturation. In a recent decision, Brent Council's Licensing Sub-Committee granted a new premises licence to 312 Investments Limited to operate an Adult Gaming Centre at 574 High Road in Wembley Central.

Public Health Impact: Brent Council's Joint Strategic Needs Assessment (JSNA) indicates that 6.2% of Brent residents are problem gamblers, more than double the national baseline, costing the borough £14.3

million annually. GambleAware puts the figure at £18 million. Scaling up gambling facilities in this vulnerable neighbourhood compounds this public health harm.

Wembley High Road does not need an expanded electronic gaming centre. The surrounding neighbourhood already faces high levels of violent crime, acute income deprivation, and heavy gambling saturation.

Following the principles affirmed in the Sheffield case, Brent Council is fully empowered to prioritise community safety and welfare over commercial gambling expansion.

We respectfully requests that the Licensing Sub-Committee refuse this application.

To: Licensing Authority, London Borough of Brent

Application Reference: 39394

Applicant: Silvertime Amusements Limited

Premises: 446 High Road & 8 Park Lane, Wembley, HA9 6AH

Proposed Use: Expanded Adult Gaming Centre (AGC)

Date: September 2026

I am writing to register my objection to the application by Silvertime Amusements Limited to expand the existing Adult Gaming Centre at 446 High Road into the adjoining premises at 8 Park Lane.

My objection is based principally on two of the licensing objectives under the Gambling Act 2005:

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

A question of the character of our high street

This is not simply a question of whether another commercial premises can operate on Wembley High Road. We should consider what kind of high street we want to create for our residents.

Wembley High Road is a busy and heavily used part of our community. It is also an area where many people are facing significant pressures with the cost of living, insecure finances, debt and the everyday struggle to make ends meet.

Against that background, I have serious concerns about substantially increasing the presence and capacity of an electronic gambling premises in this location.

Gambling premises are designed to generate frequent and repeated spending. The concern stems from such premises being located in areas with significant financial and social vulnerability. People who are already struggling financially should not be exposed to an ever-greater concentration of opportunities to lose money on the high street.

While I recognise that gambling is a legal activity and that adults have the right to make their own choices, that does not mean that a licensing authority should ignore the circumstances in which gambling premises operate or the particular vulnerabilities of the communities in which they are located.

Crime, disorder and the public realm

I am also concerned about the potential impact on crime and disorder. Wembley High Road already experiences problems associated with anti-social behaviour, theft, street disorder and the congregation of people in busy public areas. Increasing the size of a gambling premises in this location risks adding to those pressures.

The concern is not simply about what happens inside the premises. A licensing authority should also consider the wider effect of a gambling venue on the surrounding public realm, including the people who gather around such premises and the impact this can have on other businesses, residents and pedestrians.

In my view, preventing problems from arising in the first place is preferable to relying solely on CCTV, security measures or staff intervention once problems have already developed.

Protecting children and vulnerable adults

The location is also important because this is a community in which children, young people and vulnerable adults regularly use the High Road and surrounding streets. An expanded gambling premises would increase the physical presence and visibility of gambling along a route used every day by local residents, including children travelling to and from schools and nurseries.

There is also a particular moral concern where gambling premises are located close to services used by people experiencing financial hardship. Our responsibility as a council is not simply to ask whether something is technically lawful. We should also consider whether its expansion is appropriate in the circumstances of the community around it.

I am concerned that increasing gambling provision in an area where many residents are already under financial pressure risks placing a commercial opportunity directly alongside people who may be particularly susceptible to gambling-related harm.

The cumulative impact on Wembley

This application should also be considered in the context of the existing concentration of gambling premises around Wembley High Road.

The question before the Sub-Committee is therefore not simply whether one more premises can operate in isolation. It is whether expanding an existing gambling venue is consistent with the character of this particular part of Wembley and with our responsibility to protect vulnerable residents and maintain safe, welcoming high streets.

Wembley deserves a high street that provides opportunities for families, young people, residents and independent businesses. I do not believe that substantially increasing the footprint of an electronic gambling venue contributes positively to that objective.

For the reasons above, I respectfully ask the Licensing Sub-Committee to refuse this application.

From:

Sent: 30 September 2026 19:00

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

Subject: Objection to the granting of a license for Silvertime, adult gaming centre,

Dear Sir/Madam,

I'm not in the UK at the moment and have no access to Council emails.

I am one of the Conservative Councillors though I feel my colleagues will support my objection.

I am objecting to the granting of a license to Silvertime at the Wembley High Road junction with Park Lane.

Gambling is the cause of anti social behaviour, it can be very addictive and can destroy families.

This must be stopped. There are already a number of betting shops on Wembley High Road and these premises will only help to destroy the High Road and encourage more people to gamble.

Please accept this as my formal objection.

Kind regards

Cllr Michael Maurice

Conservative Group

Preston Ward

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From: Lorber, Councillor Paul

Sent: 30 September 2026 12:25

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

Subject: Fw: Your Member/MP Enquiry IRC-92974-G5V7G7 Response: FW: 399 High Road Wembley CRM:00000000573000000148

To clarify the reasons for my objections.

These premises are on the main road very close to both a High School and Primary Schools.

Hundreds of under 18s pass this location everyday and they will be exposed to another gambling venue with its enticing 'get rich quick and easy' message.

Wembley attracts many visitors to events at the Stadium and Arena. These visitors have a disproportionate habit of drinking both before and after the event - activities which already lead to anti social behaviour in Wembley High Road and nearby streets. The best way to deal with this and to avoid this is to disperse people from the area as quickly as possible. Allowing another gambling establishment which encourages people to stay late into the evening works directly against the quick dispersal objectives.

Gambling by its very nature is exploitative. The existing Gambling outlets in the area already exploit vulnerable people. Allowing an additional outlet simply increases that exploitation. Gambling is addictive. Venues are supposed to help by stopping people from gambling at a certain point but this is meaningless when people can simply hop from one venue to another.

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03-09-2026

I do want to formally object to this application. I have real concerns about the further expansion of gambling provision on Wembley High Road, particularly as there are already two Silvertime premises operating along the High Road. I appreciate that we cannot object simply because there are already gambling premises in the area, and that each application has to be considered on its own merits. However, this application is proposing to increase the size and capacity of an existing Adult Gaming Centre, and I think we need to look carefully at what that means in the context of this particular part of Wembley. My main concern is the increasing concentration and visibility of gambling uses along the traditional High Road and the potential impact on vulnerable residents. Wembley High Road serves a very large and diverse community and is used every day by families, young people, commuters and residents, including people who may be experiencing financial or social vulnerability. Brent's own gambling policy recognises deprivation, vulnerability and anti-social behaviour as important considerations when assessing the local risk of gambling-related harm. I therefore think the applicant's Local Area Risk Assessment needs to be looked at closely to establish whether it properly reflects the characteristics of this location and, importantly, the additional risks associated with increasing the size of the premises. I also have a wider concern about the direction of travel for Wembley High Road. Wembley is benefiting from significant investment and regeneration, particularly around Wembley Park, bringing new retail, leisure, hospitality and food and beverage businesses into the area. That is positive for Wembley and its wider economy, and we need to ensure that the traditional High Road also benefits from that growth and continues to attract investment and a diverse mix of businesses. My concern is that we risk creating a two-tier town centre, with newer parts of Wembley attracting a broad range of businesses and investment while gambling uses become increasingly concentrated along the traditional High Road. This is not about Wembley Park versus the High Road. Both are important parts of Wembley. It is about ensuring that investment and economic opportunity are reflected across the whole area and that the traditional High Road does not become disproportionately characterised by gambling uses. Considerable work is going into strengthening the High Road, supporting independent businesses, attracting investment, improving the public realm and creating a safer and more welcoming environment. We want people to come to the High Road to shop, eat, meet, access services and spend time locally, supported by a healthy and diverse mix of businesses. Against that background, I don't think we should look at this simply as an existing business taking some additional floorspace. Increasing the size of an Adult Gaming Centre potentially increases the capacity, accessibility and prominence of gambling at this location. Given that there are already two Silvertime premises on the High Road, I think the cumulative picture is relevant when considering the local risks and whether the proposed safeguards are sufficient. There are also wider concerns around gambling-related harm. The impacts can go beyond the individual and

include financial difficulties, debt and pressures on families and communities. Where gambling provision is concentrated in an area where there are already indicators of deprivation, vulnerability or ASB, I think we need to be particularly cautious about allowing that provision to become larger. I would therefore ask Licensing to look particularly closely at: the existing and proposed size of the premises and the extent of the increase; the existing and proposed number and type of gaming machines; whether the expansion increases overall customer capacity and intensity of gambling activity; the applicant's Local Area Risk Assessment and how well it reflects the specific characteristics of Wembley High Road; relevant deprivation, vulnerability and ASB indicators for the immediate area; the proximity and concentration of other gambling premises; proximity to schools, colleges, transport hubs, community facilities, places of worship and services used by potentially vulnerable residents; proposed opening hours; staffing, supervision and CCTV arrangements for the enlarged premises; arrangements for identifying and intervening where customers may be experiencing gambling-related harm; self-exclusion arrangements; and safeguarding measures for young people and vulnerable adults. I would welcome sight of the Local Area Risk Assessment if it can be shared, but in any event I would ask Licensing to satisfy itself that it genuinely addresses the risks associated with this location and the proposed expansion, rather than relying on the controls already in place for the existing premises. Ultimately, my concern is about where we draw the line. There are already two Silvertime premises on Wembley High Road and we are now looking at increasing the scale of one of them. We need to consider what the continued concentration and expansion of gambling provision means for the High Road and the communities that use it. For those reasons, I would like this recorded as my formal objection to the application and would ask that the concerns above are taken into account when the application is determined.

From:

Sent: 29 September 2026 21:10

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

Subject: Objection to Silvertime Amusements Expansion – 446 High Road / 8 Park Lane

Dear Brent Council Licensing Team,

I am a resident living just off Wembley High Road and would like to formally object to the proposed expansion of Silvertime Amusements at 446 High Road / 8 Park Lane.

I am concerned about the impact of expanding an existing gambling premises in an area that already has a high concentration of gambling establishments. As someone living in the immediate area, I am particularly concerned about the potential implications for crime and disorder and the cumulative impact of further gambling provision on the local community.

Please treat this email as my formal representation against the application.

Thanks for your attention to this matter.

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From:

Sent: 29 September 2026 21:13

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

Subject: Objection to Silvertime's Expansion

Dear Brent Council Licensing Team,

I am a resident living just off Wembley High Road and would like to formally object to the proposed expansion of Silvertime Amusements at 446 High Road / 8 Park Lane.

I am concerned about the impact of expanding an existing gambling premises in an area that already has a high concentration of gambling establishments. As someone living in the immediate area, I am particularly concerned about the potential implications for crime and disorder and the cumulative impact of further gambling provision on the local community.

Please treat this email as my formal representation against the application.

Thanks for your attention to this matter.

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From:

Sent: 29 September 2026 22:13

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

Subject: OBJECTION TO PREMISES LICENCE APPLICATION

To: Licensing Authority, London Borough of Brent

Application Reference: 39394

Applicant: Silvertime Amusements Limited

Premises: 446 High Road & 8 Park Lane, Wembley, HA9 6AH

Proposed Use: Expanded Adult Gaming Centre (AGC)

Date: September 2026

I am writing as a local female resident to register my strong personal objection to Silvertime Amusements Limited's application for an expanded Adult Gaming Centre (AGC) premises licence spanning 446 High Road and expanding into 8 Park Lane, Wembley.

This application seeks to absorb the former dry cleaners at 8 Park Lane into the existing gambling arcade at 446 High Road, effectively doubling its footprint and significantly increasing high-frequency electronic gaming capacity.

My objection is founded squarely on two fundamental licensing objectives under Section 1 of the Gambling Act 2005:

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime.
2. Protecting children and other vulnerable persons from being harmed or exploited by gambling.

As women living in, commuting through, this neighbourhood, our daily reality along Wembley High Road and Park Lane is defined by heightened concerns over street safety, intimidation, and safeguarding. Permitting an expanded gambling arcade directly on this corner will aggravate local crime, create hostile street environments for women and girls, and intensify the daily exposure of vulnerable young children to gambling harms.

The Reality of High Street Expansion: Women's Safety & Crime Hotspots

The applicant's Local Area Risk Assessment (LARA) fundamentally whitewashes the severe street-level crime and disorder that local residents, particularly women, navigate daily along this corridor.

Concealing Severe Local Crime Metrics: Official Index of Multiple Deprivation (IMD) metrics confirm that this specific Lower Super Output Area (Brent 020G) ranks in the worst 8% of neighbourhoods nationally for crime (more deprived than 92% of English neighbourhoods) and the worst 4% across all of Brent. The applicant's assessment conspicuously omits these alarming figures.

Minimising Serious Street Violence and Intimidation: The applicant trivialises local offending by claiming crime "mainly consists of shoplifting and theft." This dismisses the lived reality of Wembley High Road, which has seen repeated serious violent incidents, weapon recoveries, stabbings, and armed police interventions. For female pedestrians, town-centre Adult Gaming Centres act as persistent magnets for loitering, congregation, street harassment, drug dealing, and anti-social behaviour. Expanding this footprint onto the prominent corner of Park Lane expands an active pocket of street intimidation, making it significantly less safe for women and unaccompanied girls walking home from work, school, or local transport hubs after dark.

The Established Criminogenic Link: The LARA asserts that "none of these crimes are particularly linked with gambling premises." This directly conflicts with findings from the Howard League for Penal Reform's Commission on Crime and Problem Gambling, which establish that escalating gambling losses are a primary driver of acquisitive crime (theft, robbery, fraud) as well as domestic stress and violence. Doubling the terminal capacity directly fuels this cycle in a community already under extreme strain.

Interior Controls Cannot Cure Exterior Intimidation: The applicant relies heavily on internal CCTV, magnetic door locks, and panic buttons. These internal measures offer zero protection to female shoppers, mothers pushing prams, or young people on the public pavement outside who must bypass the loitering and disorder these venues reliably generate.

Protecting Children and Vulnerable Families on Daily Routes

The physical expansion of this venue into 8 Park Lane places an intensified gambling environment directly along essential everyday routes used by young children, school pupils, and mothers.

Direct Proximity to Nurseries and Schools: The premises sits just 138 feet (42m) from Eliana Bilingual Nursery, 135 feet from the London School of Science & Technology, and within 0.2 miles of both Ark Elvin Academy and Park Lane Primary School. Doubling the frontage and gaming floor on this exact corner normalises electronic gambling machines to hundreds of young children walking to and from school and nursery every single day. Children should not have to run a gauntlet of flashing terminals, gambling branding, and associated street-level disorder on their daily educational journeys.

Predatory Impact on Deprived and Vulnerable Families: Government statistics show that Brent 020G ranks in the worst 24% nationally for Child Income Deprivation (IDACI). The applicant's own assessment acknowledges that the Foodcycle Foodbank at Park Lane Methodist Church is only 0.1 miles (160m) away, alongside pawnbrokers within 0.2 miles. Siting an enlarged, automated gambling venue, where up to 20% of machines can be higher-stake Category B3 terminals (£2 stake, £500 jackpot), right beside vital emergency food provision targets families in desperate financial distress, stripping scarce resources directly away from household essentials, food, and children's welfare.

Aggressive Saturation of Wembley Central: The applicant claims venues in the area are "well dispersed." Their own documentation reveals an oppressive cluster of five gambling premises within 120 metres (Betfred at 40m, Paddy Power at 80m, MERKUR Slots at 90m, and Jennings Bet at 120m), compounded by the recent approval at 574 High Road. Siting an enlarged gambling hub here turns a family-serving retail parade into an unbroken gambling strip, eroding family-friendly amenities and community cohesion.

Compounding the Public Health Emergency: Brent Council's Joint Strategic Needs Assessment (JSNA) records that 6.2% of Brent residents are problem gamblers—more than double the national baseline. GambleAware estimates local annual gambling harms at £18 million. Brent Council unanimously declared a "gambling harms emergency" precisely to halt the expansion of predatory venues that entrench child poverty and public health crises.

Procedural Defects in the Application

The documentation submitted by the applicant exhibits a disturbing lack of genuine local engagement:

Unedited Corporate Boilerplate: In two separate sections (pages 6 and 19), the LARA states: "Third party testing by (Check Policy) on age restricted sales systems takes place...". Submitting unpopulated template text indicates that this assessment was a cut-and-paste desktop exercise rather than a diligent, site-specific safety appraisal.

Outdated Deprivation Data: The application relies on 2015 IMD maps (Appendices 1 and 2) rather than current data, in contravention of the Gambling Commission's Social Responsibility Code.

Distorted Income Metrics: Citing a commercial property estimate of £54,200 average household income conceals the deep, documented pocket of acute child and pensioner poverty defining this specific LSOA.

Statutory Powers: The Sheffield Decision

Licensing committees are often told that national legislation creates an unavoidable presumption in favour of granting licences under Section 153. This is not the case.

In the 2025 Sheffield Magistrates' Court appeal (Royal Amusements v Sheffield City Council), District Judge Spruce firmly upheld a local authority's refusal to permit an AGC in a sensitive, deprived town-centre corridor, establishing key legal precedents:

1. Councils are the guardians of local harm: Local licensing authorities bear the statutory duty to protect their local communities from cumulative impact and localised vulnerability.
2. "Aim to permit" is not an unconditional duty: Section 153 does not compel a licensing authority to grant an application that conflicts with local risk assessments, statutory codes, or the core licensing objectives.
3. Internal conditions cannot remedy external community harm: Standard venue conditions (CCTV, staff training, alarms) cannot regulate or mitigate the broader harms, street disorder, and domestic pressures that spill out into the surrounding neighbourhood.

Conclusion

Wembley High Road does not need an expanded electronic gambling arcade. As a female resident, I urge the Sub-Committee to listen to the lived experiences of women and families who rely on these streets. Doubling the size of this venue directly threatens female safety, invites street-level crime, and exposes vulnerable children and struggling families to escalating harm.

Under the powers affirmed in the Sheffield judgment and in alignment with Brent's declared gambling harms emergency, I respectfully request that the Licensing Sub-Committee refuse this application in its entirety.

Many thanks in advance,

From:

Sent: 30 September 2026 11:46

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

Subject: Objection to premises license application- 39394

To whom it may concern,

I am a Wembley resident who is writing to express my objection to the proposed licensing application by Silvertime Amusements Limited to open a new gambling centre on Wembley Highroad.

I disagree with this for many reasons, already expressed by community members and the Green Party councillors. Particularly I am worried about the rise of addiction and anti social behaviour that this would enable, alongside redirecting investment away from the local community and beneficial services like the existing laundromat which this would be displacing.

The proximity to local schools, and placement in an already socio-economic deprived area is especially exploitative and the council has a moral responsibility reject this application in favour for beneficial investments to the community. That decision would also be in line with the attitude and wishes of the local community who strongly oppose the gambling expansion to their streets.

In conclusion, Wembley High Road does not need an expanded electronic gambling arcade. As a resident I urge the Sub- Committee to listen to the lived experience of residents and families who rely on these streets. Doubling the size of this venue directly threatens women and public safety, invites street- level crime, and exposes vulnerable children and struggling families to escalating harm.

Under the powers affirmed in the Sheffield judgment and in alignment with Brent's declared gambling harms emergency, I respectfully request that the Licensing Sub-Committee refuse this application in its entirety

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From:

Sent: 30 September 2026 21:32

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

Subject: Silvertime Amysements

Dear Brent Council,

I wish to object to the application by Silvertime Amusements Ltd to expand its existing Adult Gaming Centre at 446 High Road, Wembley, into the neighbouring premises at 8 Park Lane.

I do not believe that Wembley Central would benefit from a larger gambling venue. There are already significant concerns regarding the concentration of gambling establishments in this area of Wembley, together with the associated risks of crime and disorder, gambling-related harm, and the impact on children and vulnerable residents.

My objection is based particularly on the need to uphold the licensing objectives of:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime; and
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

As a resident of Wembley for over 50 years, I am deeply concerned that this expansion would further increase the presence and influence of gambling facilities in our community and could exacerbate existing social harms.

Yours faithfully,

Wembley resident for over 50 years

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From: Andrew Woods

Sent: 24 September 2026 14:56

To: Maldoom, Edwin

Cc: Andrew Woods; Christopher Rees Gay

Subject: RE: New Adult Gaming Centre - Silvertime Amusements, 446 High Road & 8 Park Lane, HA9 6AH (REF: 39394)

Hi Edwin

Further to my earlier e mail and your e mail below I have spoken to Silvertime.

1. Most Category B machines have the facility for the Customer to set 'reality checks' when they start playing a machine. When they start playing a box comes up asking them if they want to set a 'reality check' but relating to time spent playing or the amount of money spent etc. There are some still older machines around that don't have this facility and on those machines customers are offered a stop watch to monitor their time. In addition staff monitor the time spent by customers on machines.
2. I can confirm that we would agree your proposed condition on staffing.

Hope that helps and let me have any other proposed conditions.

Andy

Andrew Woods

Woods Whur 2014 Ltd

From: Maldoom, Edwin

Sent: 22 September 2026 15:08

To: Andrew Woods

Subject: New Adult Gaming Centre - Silvertime Amusements, 446 High Road & 8 Park Lane, HA9 6AH (REF: 39394)

Importance: High

Good afternoon Andrew,

I hope you are keeping well.

As you might be aware, I'm the delegated officer on behalf of the Licensing Authority, in whose area the above-mentioned premises is situated, and who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Gambling Act 2005.

Having carefully gone through the new premises licence application, the LARA, and having regard to the current Silvertime Bingo Betting premises licence for 446 High Road, HA9 6AH, I'm currently preparing a list of proposed conditions which will hopefully form part of the new AGC premises licence.

As such, I don't believe that the proposed conditions will be materially different from the information already set out within the LARA. Consequently, I have translated what is stipulated into clear, understandable, and enforceable conditions for your client, staff working on the premises, and the responsible authorities.

However, before I send the full list across, there are a couple of points that I would be grateful if you could clarify.

1. Will all the Category B gaming machines be programmed to provide 'reality check' notifications, or any similar customer interaction prompts, to customers who use them for a prolonged period of time? I'm mindful that welfare checks will also be undertaken by trained and experienced staff. However, I would be grateful to know whether the gaming machines themselves will provide such notifications or anything similar.

2. In relation to staffing levels and the provision of SIA-licensed security, I understand that the LARA suggests that this will be determined by risk assessment. However, is there any minimum requirement pertaining to staffing levels that can be agreed by way of a condition? I.e., such as the below:

"There shall be a minimum of two members of staff on duty at all times whilst the premises are open for authorised activities, one of whom shall hold a valid SIA licence between the hours of 23:00 and 07:00."

Ideally, I would prefer for the hours and staffing levels to be explicitly stipulated as a condition. However, I would be happy to hear both your views and those of your client if this isn't something that your client would be willing to consider.

If you have any questions, or would like to discuss the proposed conditions further, please do not hesitate to contact me.

Many thanks,

Edwin Maldoom

Licensing Enforcement Officer

Regulatory Services

**Application for a premises licence: Silvertime Amusements, 446 High
Road & 8 Park Lane, HA9 6AH (REF: 39394)
Proposed Conditions**

1. The premises shall operate and maintain a digital colour CCTV system. The CCTV system shall be in operation and recording at all times whilst the premises are open for authorised activities. All recordings shall be kept for 31 days and shall also display the correct date and time on any recordings.
2. The CCTV system shall capture clear images of every person entering or leaving the premises with further CCTV cameras covering the publicly accessible areas stipulated on the premises plan, including coverage of all gaming machines, as well as the immediate frontage on Park Lane & High Road, Wembley.
3. A CCTV monitor shall be installed within the premises and positioned so as to be readily visible to staff.
4. CCTV footage shall be made available for immediate viewing upon request by the Police and any authorised Officers from Brent Council by a member of staff who is conversant with the operation of the CCTV system. CCTV footage shall also be provided to the Police and any authorised Officers from Brent Council, in a readily accessible format on removable media or via digital transfer within 24 hours of request.
5. Notices stating that CCTV is in operation shall be clearly and prominently displayed.
6. A 'Challenge 25', or any other similarly recognised age verification policy, shall be operated at the premises, whereby the only acceptable forms of identification are a passport, photocard driving licence, proof of age card bearing the PASS hologram, or a government-approved digital proof of age credential issued through an approved digital verification service. Notices advising customers of the age verification policy shall be conspicuously displayed within the premises.
7. A physical or electronic refusals log shall be kept at the premises which records all age verification challenges made by staff to customers. The log shall record the date/time of the challenge, a description of the customer, the name of the member of staff who made the challenge, and any other relevant observations. The refusals log shall be made available for inspection upon request by an authorised officer of Brent Council or the Police.
8. Independent third-party test purchasing shall be carried out at the premises at least twice per year to assess compliance with the prohibition on under-18s entering the premises and using gaming machines. The results of such test purchasing shall be made available for inspection upon request by an authorised officer of Brent Council or the Police.

9. There shall be a minimum of two members of staff on duty at all times whilst the premises are open for authorised activities and whilst customers are present, one of whom shall be SIA licensed between the hours of 23:00 and 07:00.
 10. Staff shall continuously monitor customer activity when they are in the premises.
 11. A policy shall be implemented to ban any customer who engages in crime, disorder, or anti-social behaviour within the premises or in the immediate vicinity of the premises. A record of all banned customers shall be maintained and shall be made available for inspection upon request by an authorised officer of Brent Council or the Police
 12. All reasonable steps shall be taken to prevent customers from consuming alcohol directly outside the premises. Any customer found consuming alcohol outside the premises shall be banned from the premises in accordance with the premises' banning policy. A notice shall also be prominently displayed and visible from the exterior of the premises stating that the consumption of alcohol outside the premises is not permitted and that customers who do so will be banned.
 13. No open alcoholic drinks shall be permitted on any publicly accessible area defined on the premises plan. Notices shall be clearly displayed at the entrance to the premises informing customers of this.
 14. Staff shall refuse the use of any gambling machines to customers who appear to be under the influence of alcohol or drugs, and such customers shall be asked to leave the premises. Any such incidents shall be recorded in the incident log.
 15. An up-to-date incident log shall be maintained, which shall record the following:
 - a. any incidents of crime and disorder.
 - b. any incidents where a customer is ejected or asked to leave the premises.
 - c. any incidents where a customer is barred from the premises.
 - d. any complaints received.
 - e. any faults in the CCTV system.
 - f. any visit by a relevant authority or emergency service.
- Any entries into the incident log shall be made as soon as reasonably practicable following any such incident and shall include the date and time of the incident, the nature of the incident, a description of the persons involved, the action taken, and the name of the person responsible for the management of the premises at the time of the incident. The incident log shall be made available for inspection upon request by an authorised officer of Brent Council or the Police.
16. All seating within the premises shall be secured to the floor or suitably weighted to prevent lifting.

17. A panic button shall be installed and maintained at the Customer Service Desk. All staff working away from the Customer Service Desk shall wear a portable personal panic alarm.
18. Customer toilets shall be checked hourly for evidence of drug taking, and a record of the time of the check and the staff member undertaking it shall be maintained.
19. Customer access to the toilet shall be controlled by staff and shall only be permitted following staff authorisation.
20. GamCare, self-exclusion, National Gambling Helpline, or any other relevant information relating to responsible gambling and problem gambling shall be prominently displayed within the premises and made readily available to customers.
21. Category B gaming machines shall display safer gambling messages and, where capable, be programmed to provide reality check notifications to customers. For any Category B gaming machine not capable of providing reality check notifications, timer clocks shall be made available to customers.
22. Staff training shall be undertaken by all members of staff involved in authorised activities. All staff shall also undergo refresher training at least once every 6 months, with all training recorded. Training shall include the following topics, although this list is not exhaustive:
 - a. customers who are, or may be, at risk of harm from gambling, and how to interact with them appropriately.
 - b. BACTA codes of practice.
 - c. recognising signs of customer intoxication.
 - d. self-exclusion.
 - e. customer disputes & conflict management.
 - f. anti money laundering.
 - g. any other potential issues identified within the local area risk assessment, or other relevant operating procedures and policies set by the operator.
 - h. the three licensing objectives and premises licence conditions.

Training records shall include the date and time of the training, the name of the staff member trained, and the training topic covered. Staff training records shall be made available for inspection upon request by the Police or authorised officers of Brent Council.

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From: Maldoom, Edwin
Sent: 06 October 2026 14:01
To: Andrew Woods
Cc: Legister, Linda; Business Licence
Subject: RE: Draft Licensing Conditions - Silvertime Amusements, 446 High Road & 8 Park Lane, HA9 6AH (REF: 39394)

Good afternoon Andrew,

Thank you for your response.

Given the agreement below regarding the attached conditions, I can confirm that the Licensing Authority withdraws its holding representation.

Best regards,

Edwin Maldoom
Licensing Enforcement Officer
Regulatory Services

From: Andrew Woods
Sent: 06 October 2026 13:48
To: Maldoom, Edwin; Andrew Woods
Cc: Legister, Linda; Business Licence
Subject: FW: Draft Licensing Conditions - Silvertime Amusements, 446 High Road & 8 Park Lane, HA9 6AH (REF: 39394)

Hi Edwin

Further to your e mail below I am pleased to confirm that all conditions are agreed.
Are you able now to withdraw your rep? Linda/Licensing copied in?

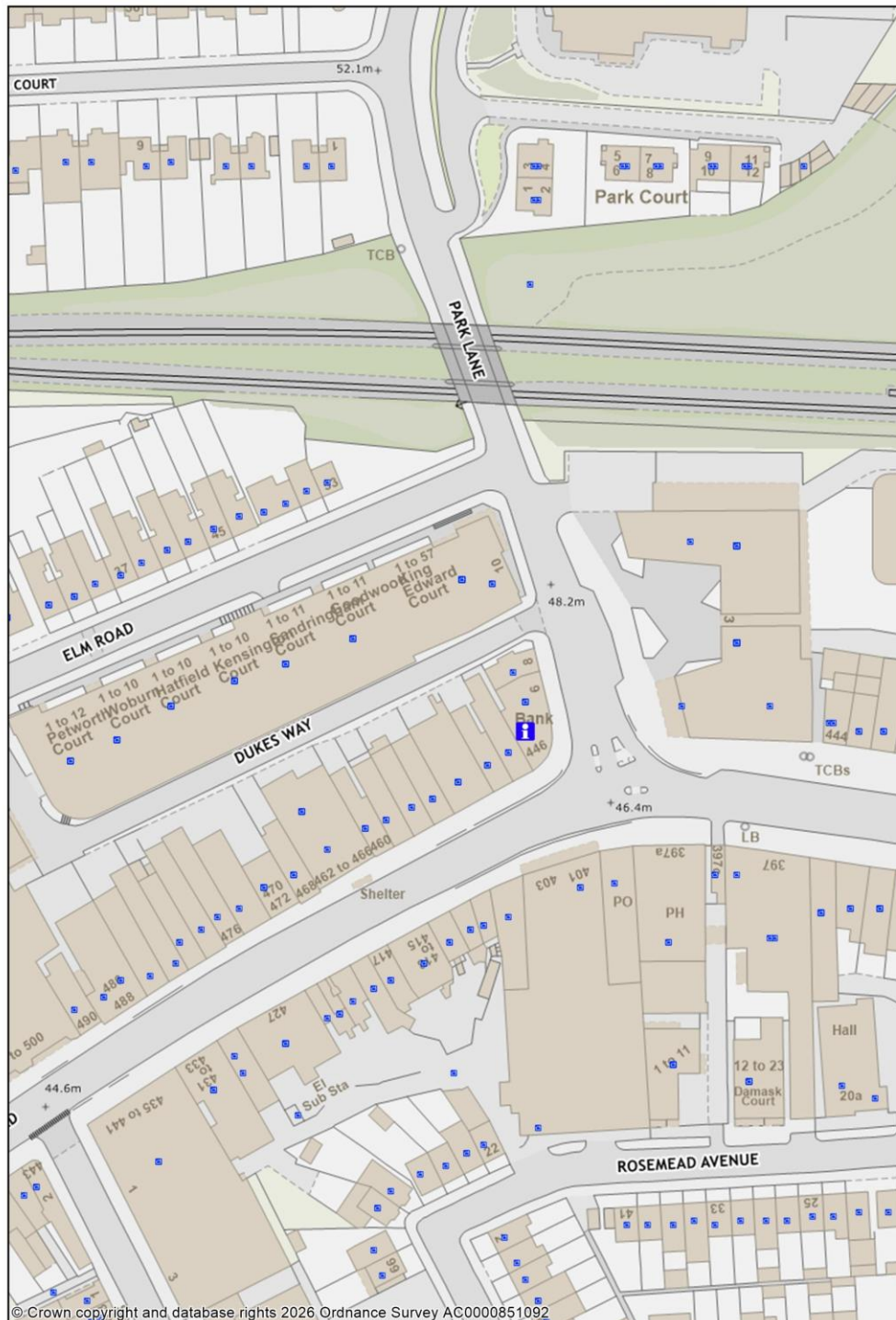
Andrew

Andrew Woods

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Basemap Map



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Brent

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