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Sent: 23 April 2026 14:58

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

Subject: Representation objecting to application for a Premises Licence under the Gambling Act 2005 for Vault Casino, 574 High Road, Wembley, HA0 2AA

Dear Sir / Madam,

As the Member of the London Assembly for Brent and Harrow, I am writing to formally submit my objection to the application for a new Adult Gaming Centre (AGC) at **574 High Road, Wembley**.

My objection is rooted in the three core licensing objectives set out under the **Gambling Act 2005**:

1. The prevention of gambling from being a source of crime or disorder.
2. Ensuring that gambling is conducted in a fair and open way.
3. The protection of children and other vulnerable persons from being harmed or exploited by gambling.
- 4.

This representation is not an objection to gambling in principle, but rather a firm stance that our community has reached a saturation point. Brent already contends with one of the highest concentrations of gambling premises in the United Kingdom. According to **Brent's Joint Strategic Needs Assessment (JSNA) on Gambling**, there are 81 licensed premises in the borough, and we suffer from higher-than-average levels of gambling harm. It is evident that businesses are targeting our high streets because they view economic deprivation as a commercial opportunity.

1. Preventing Gambling from being a Source of Crime or Disorder

The **Social Market Foundation (SMF)** report, *High streets at stake*, highlights that AGCs frequently create risks regarding crime and anti-social behaviour (ASB) due to high cash turnover and money laundering vulnerabilities.

The applicant's own "Social Responsibility and Compliance Pack" acknowledges these risks by proposing CCTV and staff monitoring to manage aggressive customers and suspicious activity. However, standard policies cannot mitigate the cumulative impact of another gambling hub in this specific location. The **More in Common** report, *Ending a*

Losing Streak, found that residents in Brent and beyond feel these shops "bring the area down," linking them to heavy drinking and community decline. Adding a further unit to an existing cluster of betting shops and pawnbrokers will inevitably exacerbate these issues.

2. Ensuring Gambling is Conducted in a Fair and Open Way

While the applicant provides generic paperwork regarding complaints and due diligence, they fail to provide a convincing argument for how this specific site will operate transparently within such a sensitive local context.

Furthermore, the application is ambiguous regarding opening hours. While the form suggests no extended hours are sought, a concurrent planning application suggests otherwise. This lack of clarity prevents the Licensing Authority from accurately assessing the impact on the local environment. A fair high street is a balanced one; a street dominated by gambling is neither fair nor healthy for the local economy.

3. Protecting Children and Vulnerable People

This is my gravest concern. Brent's JSNA identifies significant local vulnerabilities linked to financial stress and deprivation. The SMF report notes that **44% of young people** feel that the proximity of gambling venues increases interest in gambling among their peers.

The site at 574 High Road does not exist in a vacuum. It sits adjacent to a Coral and is within 50 feet of two Silvertime premises, a Paddy Power, and a branch of Gr8odds. By continuing to stack these premises on top of one another, we are normalising gambling for the children and families who use Wembley High Road daily. Baseline measures like "Challenge 25" are insufficient when the sheer density of these establishments makes gambling feel unavoidable for those already struggling with addiction or mental health pressures.

Summary

The evidence is clear:

- **Brent's JSNA** confirms we already have excessive gambling harm.
- **The SMF** confirms that AGCs cluster in poorer areas to the detriment of the community.
- **The public**, as evidenced by the More in Common report, would prefer an empty shop unit over another gambling establishment.

Standard corporate safeguards do not override the fact that this application is fundamentally inconsistent with the licensing objectives. This proposal will not improve Wembley High Road; it will further degrade it. I therefore respectfully urge the Licensing Authority to **refuse** this application.

Best wishes,

Krupesh

Krupesh Hirani AM

London Assembly Member for Brent and Harrow

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