

To: Brent Licensing Authority

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

Applicant: 312 Investments Limited

Premises: Vault Casino, 574 High Road, Wembley, HA0 2AA

Link: [Brent | MyPortal | Licence Register | 37927](#)

We write to object to the application by 312 Investments Limited for a new Adult Gaming Centre premises licence at 574 High Road, HA0 2AA. 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.

Brent is already disproportionately affected by gambling related harms and opening another AGC 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 across London and the country, but that it is also among the areas with the highest number of people gambling with the most severe consequences. According to the Problem Gambling Severity Index (PGSI) scale used in many official surveys on gambling, it reports that 17.1% are considered to be gambling with at least a low-level of risk (vs 13.4% in the rest of the country), while 6.2% are considered to be gambling with the highest level of risk - more than twice the national average of 2.9%. Latest figures 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 with one of the highest concentrations of land-based gambling premises in London suggests a local environment of heightened exposure to harm.

Furthermore, this application should also be seen in the wider context of what residents want from their high streets and how they already perceive the proliferation of gambling shops on their doorsteps. Qualitative insights from the JSNA revealed that many felt that gambling companies were actively targeting Brent and the vulnerable people living in deprived areas. As one Brent resident powerfully put it:

“There's a problem in Brent, obviously. They wouldn't have all these bookie shops otherwise. They know they can make money from poor people always trying to make an extra buck.”

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

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

The proposed premises is located on Wembley High Road in the ward of Wembley Central. The applicant's own Local Area Risk Assessment (LARA) cites the area's safety score of only 7/100, pointing out that of the 8,763 crimes committed within the last 12 months, most were related to violent crimes and anti-social behaviour. Figures from the Metropolitan Police Service in 2023 also show that Wembley Central saw one of the highest increases in robberies and burglaries in the borough (an increase of 154 from the year before).

As Brent's JSNA reveals, there is some evidence linking gambling behaviour with criminal activity. Crimes committed by gamblers often involve theft or fraud and can also contribute to violent interpersonal crimes like domestic abuse. Though data on this is limited, this is partly because crimes are often recorded for what they are and rarely include what the crime was motivated by. Furthermore, gambling is rarely specifically asked about in these types of assessments.

This is particularly relevant in the context of premises-based gambling, where operators are required not only to manage on-site behaviour but to assess whether the provision and operation of such premises may contribute to wider areas of harm in the local area. Evidence suggests that incidents of violence and disorder in AGCs are likely under-reported, if reported at all. A Freedom of Information (FOI) request to Warwickshire Police revealed that although the current Crime Recording System does not identify AGCs as a location type, the FOI was able to identify from postcode data that 1667 offences had occurred around matching registered AGCs within a 5 month period. It is worth noting that there are 12 AGCs in Brent alone, compared to the 9 premises found across the 5 district and borough councils of Warwickshire County.

In the applicant's LARA there doesn't appear to be an acknowledgement of the relationship between gambling and these wider harms. While the assessment recognises the potential impact of crime as 'severe' for both the business and customer, it categorises the level of risk as 'low.' This conclusion appears to rest primarily on security measures, such as CCTV and intruder alarms, which are presented as sufficient mitigation. These measures focus on managing incidents on-site and fail to address the wider ways in which gambling-related harm can contribute to crime and disorder beyond the site itself.

Lastly, the LARA expressly acknowledges a concentration of nearby gambling premises, pawnbrokers, bars and pubs. As research by More in Common found, this is a key area of public concern. Speaking to Britons, including a focus group with residents in Brent,

the report revealed specific concern about the relationship between gambling venues, heavy drinking, and anti-social behaviour.

Taken together, this is evidence of a local environment in which the risk of crime is heightened, not reduced.

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 is concerned not only with the technical operation of gaming machines, but also with whether customers can reasonably understand the nature of the gambling on offer, the risks involved, and the terms on which they are participating. This includes transparency of information and the extent to which customers are able to make informed decisions.

The proposed premise at 574 Wembley High Road is within the Wembley Central ward which already hosts nine licensed gambling premises – the highest number across the borough. This particular premise would add a fourth venue less than 250 feet away from each other. The applicant’s own LARA highlights nine gambling venues within around a half mile radius, as well many other similar premises nearby that sit outside of the ward’s boundaries. The map below highlights the exact spot of the proposed premises. As the venues are so close together, all four locations are indicated by the two black triangles in the red square. The map also highlights how the premises sits within the most deprived areas of Wembley, indicated by the darker shade of purple, compared to the lighter blue.



Such a high concentration of gambling venues contributes to a cumulative environment where gambling is both normalised and difficult to avoid. This concern is heightened by

the area's high levels of socio-economic deprivation as financial pressure can often influence decision-making and risk perception. Evidence cited in Brent's JSNA shows that 37% of Citizens Advice advisers reported taking calls from people who had turned to gambling in the hope of improving their financial situation, with 19% reporting cases where gambling was being used specifically to cover essential costs such as energy bills. GamCare advisers similarly report callers in receipt of Universal Credit who gamble as a perceived means of generating additional income to meet basic expenses. In this context, the applicant has not demonstrated how the operation of the premises would remain fair and open in an environment where cumulative exposure and vulnerability are likely to affect decision-making.

The applicant recognises failure to provide information on responsible gambling to players as having the potential to severely affect customers, though it still categorises it as a low risk overall. However, it appears that measures mainly adhere to the legal minimum requirement to prominently display safer gambling messaging and to ensure information on safer gambling is readily available. The applicant mentions the provision of generic and passive signage and information available, and does not include anything in relation to the specific characteristics of the premises and its customer base. For example, the LARA identifies that 86% of the local population is non-white while 14% are unable to speak English well. It also points out that at around two-thirds of households in the area are deprived in at least one dimension. However, there is nothing to suggest that there is any targeted support for these groups or that information has been adapted to ensure that customers in these groups are able to meaningfully understand the nature of gambling on offer, the risks involved, or routes to complaint and redress. Furthermore, as Brent's JSNA highlights, ethnic minority groups and those living in areas of higher deprivation (and therefore closer to gambling venues), are some of the worst affected by gambling harms.

Additionally, the applicant's compliance policies include provisions that place significant discretion in the hands of the operator, including the ability to disclaim responsibility where self-excluded customers have still managed to gamble within the premises and have incurred losses.

More generally, the SMF report *High Streets at Stake* raises concerns that some AGCs are not always operated transparently, including examples of apparent attempts to circumvent machine ratio rules and poor presentation of key information to customers. The report concludes that AGCs raise real questions under the "fair and open" objective.

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

Granting a premises license for an additional AGC at this location would bring an increased risk of gambling-related harm to the people who live, work, study and spend time in the surrounding area. While gambling-related harms can affect anyone, the evidence consistently shows they fall disproportionately on those already most vulnerable. In fact, research shows that the groups least likely to gamble overall often experience the most severe harms.

Those most likely to be negatively affected by the opening of this new Adult Gaming Centre include:

- children and young people
- people living with mental health conditions
- people in treatment for substance misuse
- people experiencing financial hardship
- people living in areas of high deprivation
- people from ethnic minority groups

Brent is the fourth most deprived borough in London, with a younger-than-average population alongside high levels of ethnic diversity. The estimated prevalence of common mental health conditions is also higher in Brent (20.7%) than across London (19.3%) or the country (16.9%). This demographic profile means Brent is home to a high concentration of groups known to have a greater risk of gambling-related harm.

Evidence shows that these high-risk groups are much more likely to experience harm from gambling compared to their counterparts. For example:

- 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
- Individuals who experience gambling harms are up to 15 times more likely to be at risk of suicide

Gambling venues are also known to be disproportionately clustered in areas of higher deprivation. This pattern applies both across Brent as a whole and within Wembley specifically. This is significant as research suggests a relationship 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)
- The likelihood of young people (aged 18-21) encountering gambling problems, as opposed to never gambling, increases by 39% for each additional form of gambling operator located with their local area
- Higher concentrations of gambling premises are associated with higher rates of ‘problem 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 applicant’s own LARA identifies similar groups as vulnerable, supporting concerns that opening a further venue would do little to protect them from harm. It identifies numerous schools, colleges, medical centres, care homes, children’s play areas, hostels, foodbanks, all within a mile radius of the proposed premises. It recognises that these groups are susceptible to out of control gambling, yet categorises these risks as ‘low’. This assessment places disproportionate confidence in the proposed mitigation measures and significantly undermines confidence that the risks have been robustly or realistically evaluated.

In particular, the proposed controls rely heavily on staff to identify and respond to harmful gambling behaviours, yet the applicant proposes a minimum of only two staff members on site at any given time. Measures to mitigate harm also rely largely on signage and information available in-store, where there is no guarantee that individuals will take notice.

Public concern further reinforces these risks. Research indicates widespread anxiety about the impact of gambling venues on children and young people. The SMF report found that 44% of young people aged 14–17 agreed that the presence of gambling venues near their homes increases interest in gambling among their age group, while 27% reported knowing young people who had visited an AGC.

Finally, gambling is commonly described as a ‘hidden addiction’, as harmful behaviours often develop gradually without overt warning signs. Normalisation of gambling within everyday environments is therefore one of the most significant risk factors for harm, as it further obscures these early warning signs, minimising the idea that gambling can cause major harm, while increasing exposure for those who may be attempting recovery. Introducing an additional AGC in an area already saturated with gambling premises would further entrench this normalisation and intensify risk.

“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

Summary

This objection is not to gambling in principle, but to the introduction of an additional Adult Gaming Centre in an area already experiencing the disproportionate burden of gambling-related harm. The evidence set out above demonstrates that **the application fails to provide sufficient assurance** that granting the license would be compatible with the licensing objectives under the Gambling Act 2005.

Yours sincerely,

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