

From: Shah, Councillor Sonia <Cllr.Sonia.Shah@brent.gov.uk>

Sent: 12 April 2026 13:52

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

Importance: High

I am writing to object to the application for a new Adult Gaming Centre at 574 High Road, Wembley.

My objection is based on the three licensing objectives under the Gambling Act 2005:

- 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 people from being harmed or exploited by gambling.

This is not about opposing gambling in principle. It is about saying enough is enough, we are already at saturation point.

Brent already has one of the highest numbers of gambling premises in London and the United Kingdom. Brent's Joint Strategic Needs Assessment on Gambling says there are 81 licensed gambling premises in Brent, and that the borough has higher-than-average levels of gambling harm. It also says Brent has more people gambling at harmful levels than the national average. Businesses like the applicant are deliberately targeting our borough, because with poverty comes commercial opportunity.

That matters because the harms are not spread evenly. Brent's Joint Strategic Needs Assessment on Gambling says gambling premises are clustered in more deprived parts of the borough, and that Brent's population matches many of the groups most at risk of gambling harm. It also says the estimated economic cost of gambling harm in Brent rose from £2 million in 2012 to £14.3 million in 2022.

The Social Market Foundation report, High streets at stake: The rise of Adult Gaming Centres and the case for reform, makes the same point in even starker terms. It says

Adult Gaming Centres are spreading, especially in poorer communities, and that there is evidence they are linked to crime, anti-social behaviour and harm to vulnerable people. It also says Brent is a case study in how gambling premises can cluster in deprived areas and deepen local harm.

The More in Common report, Ending a Losing Streak, found that a plurality of Britons want the gambling industry to shrink, not grow, and that people would rather have an empty shop on their high street than a gambling shop. It also found that close to half of people think there are already too many gambling premises in their area.

That speaks directly to this application. This site is not going into a vacuum. It is going into a part of Wembley already heavily shaped by gambling uses. As set out locally, the proposed site sits next to a Coral and within around 50 feet of two Silvertime premises, a Paddy Power, a branch of Gr8odds and a pawnbroker. In plain English, this is a cluster already. Adding another AGC on top does not improve the high street. It drags it further in the wrong direction.

The applicant has submitted an application form together with a Social Responsibility and Compliance Pack. But the point here is that standard company policies do not answer the bigger question the Licensing Authority has to decide: whether this particular premises, in this particular location, is reasonably consistent with the licensing objectives. The applicant's documents set out generic controls like CCTV, Challenge 25, self-exclusion, staff training and incident logs. Those are basic expectations. They do not change the wider local picture – this application is not welcome in our community.

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

This is the first reason the application should be refused.

The Social Market Foundation report, High streets at stake: The rise of Adult Gaming Centres and the case for reform, says AGCs create risks around crime and disorder. It highlights high cash use, money laundering concerns, and worries from residents about anti-social behaviour around these premises.

The applicant's own documents accept that these risks exist. The application proposes conditions around CCTV, banning disorderly customers, refusing entry to people under the influence of alcohol or drugs, incident logging and staff monitoring. The compliance material also refers to risks around aggressive customers, suspicious activity, money laundering, fraud and police attendance. So even on the applicant's own case, this is the kind of premises that brings crime and disorder risks which have to be taken seriously.

The More in Common report, *Ending a Losing Streak*, backs that up with what people actually say about their towns. People described gambling shops as bringing areas down and linked them to heavy drinking, anti-social behaviour and wider community decline. One Brent participant said: "It defies logic why you need six betting shops... I just think it just brings the area down."

That is exactly the issue here. When you already have a dense row of gambling premises and then add another one, it is not credible to pretend there will be no extra impact. Common sense says otherwise, and the research says otherwise too.

It is also relevant that the application does not clearly set out the intended opening hours. The form says the applicant is not seeking extended hours, but we can see a live planning application to give this site longer operating hours. Either way, this omission makes it harder for the Licensing Authority properly to judge the likely impact on crime, disorder and anti-social behaviour.

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

This is the second reason for objection.

The Social Market Foundation report, *High streets at stake: The rise of Adult Gaming Centres and the case for reform*, raises wider concerns about how AGCs operate, including transparency and whether people are really being protected in practice. It says there are real questions about whether these premises always meet the "fair and open" objective.

The applicant's paperwork says the right things in broad terms. It refers to complaints procedures, customer interaction, due diligence, staff training and terms and

conditions. But a bundle of standard policies is not the same as a convincing explanation of why this particular site, in this particular stretch of high street, would operate fairly and openly in practice.

There is also little real detail in the application about how this premises will function day to day in such a sensitive local context. Again, the lack of clear stated operating hours matters. The Licensing Authority is being asked to approve a new AGC without a fully clear picture of how the premises will operate across the week.

The bigger point is this: the more gambling premises you pack into one stretch of high street, the harder it is to argue this is a fair, balanced or healthy local environment. It normalises gambling, makes it more visible, and makes it more available to people who may already be struggling. That is not what a fair and open local offer looks like. It looks like oversaturation.

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

This is the strongest ground of all.

Brent's Joint Strategic Needs Assessment on Gambling makes clear that this borough has high levels of vulnerability when it comes to gambling harm. It identifies deprivation, financial stress and other vulnerabilities that increase the risk of harm.

The Social Market Foundation report, High streets at stake: The rise of Adult Gaming Centres and the case for reform, says AGCs are concentrated in poorer areas and that more gambling venues can mean more harm. It also found that 44% of young people aged 14 to 17 said gambling venues near where they live make people their age more interested in gambling, and 27% said they knew young people who had visited an AGC.

The More in Common report, Ending a Losing Streak, makes public concern very clear. It found that 68% of Britons think under-18s should not see gambling advertising at all and that people are deeply worried about how normal gambling is becoming for children and young people.

The applicant's own compliance pack recognises many of the same risks. It refers to vulnerability linked to poor health, addiction, bereavement, financial difficulties, homelessness and impaired judgement, and it sets out tools like Challenge 25, self-exclusion and customer interaction. The application itself also proposes Challenge 25, third-party age testing and visible notices.

But those are baseline measures. They do not answer the much bigger problem here, which is the location and the clustering. If you keep stacking gambling premises on top of one another, you send a message about what this high street is for and who it is for. You make gambling feel normal, constant and unavoidable. That is bad for children, bad for vulnerable adults, and bad for families already dealing with pressure on money and mental health.

Summary

This application should be refused.

Brent already has too many gambling premises and too much gambling harm. Brent's Joint Strategic Needs Assessment on Gambling says so. The Social Market Foundation report, High streets at stake: The rise of Adult Gaming Centres and the case for reform, says AGCs are clustering in poorer communities and causing harm. The More in Common report, Ending a Losing Streak, says the public want fewer gambling premises, not more, and would rather see an empty unit than another gambling shop.

The applicant has provided standard policies and standard safeguards. But that does not change the basic point. This proposal would put yet another AGC into a part of Wembley already overloaded with gambling premises and related uses.

It is adding one more gambling premises into a cluster that is already too dense. That means more risk of anti-social behaviour, more normalisation of gambling, more harm to vulnerable people, and more damage to the character of the high street.

For those reasons, granting this application would not be reasonably consistent with the licensing objectives. I therefore respectfully ask the Licensing Authority to refuse it.

Best wishes,

Sonia

Councillor for Wembley Central