



Silvertime Amusements Ltd  
48/50, High Street  
Watford, Herts  
WD17 2BS

Brent Licensing Department  
Brent Council Regulatory Services  
Brent Civic Centre  
Engineers Way  
Wembley  
HA9 0FJ

28th April 2026

Dear Sirs,

**Representation to a Licence Application at 574 Wembley High Road, Wembley, HAO 2AA-312 Investments Limited**

This representation is made on behalf of Silvertime Amusements Limited to an application for a premises licence under the Gambling Act 2005 in respect of Vault Casino at 574 Wembley High Road, Wembley, HAO 2AA. The application is made by 312 Investments Limited.

We are an interested party under the Gambling Act 2005 s158(b). We operate the following businesses in the nearby area;

- 509 High Road, Wembley, HAO 2DH - Adult Gaming Centre
- 572 High Road, Wembley, HAO 2DH - Adult Gaming Centre
- 446 High Road, Wembley, HA9 6AH - Bingo

We acknowledge that this is a somewhat unusual representation as we operate Gambling Act 2005 premises licences, and we would therefore be a trade competitor to the application site if the licence is granted. We accept that "demand" is not a relevant ground for making a representation under the Gambling Act 2005, and our representation is not based on demand, but on the potential impact of the application on the licensing objectives.

Our objection is based on the assertion that the application as submitted is not reasonably consistent with the licensing objectives, is not in accordance with the relevant code of practice issued under the Gambling Act 2005 section 24, is not in accordance with any relevant guidance issued by the Gambling Commission under the Gambling Act section 25 and is not in accordance with the Brent Statement of Gambling Policy Issued under the Gambling Act section 349.

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



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The Licensing Objectives are set out in the Gambling Act 2005 section 1, and this application is to be considered under the principles to be applied set out in the Gambling Act 2005 section 153.

The application is submitted in a location that has a large number of Gambling Act 2005 premises, and suffers from anti-social behaviour and crime and disorder.

A Local Area Risk Assessment has been submitted by the applicant which does acknowledge that the application site is situated between a licensed bar and Coral's betting shop to one side, a money transfer shop and bank to the other, and is immediately opposite one of our Adult Gaming Centres, and that there are also other premises nearby.

The Local Area Risk Assessment is limited to the following information on the area:

- 3 pages of statistics which have clearly just been pulled from a website.
- 1 page on crime statistics
- 1 page on nearby schools and colleges
- Information on banks, pawn shops, pubs and bars, churches and a list of other gambling premises, as well as medical centres, care homes and transport hubs
- The actual risk assessment runs to only 4 pages and no more, and although not absolutely clear, it appears that this is an application for a 24/7 site.
- The risk management measures set out in the 4 pages are extremely limited, and do not, in our opinion, show an understanding of the area, the risks, or how to manage the risks in this area.

We understand that the applicant does not trade any other Gambling Act 2005 premises and is a new entrant to the industry. Many things are not clear from the risk management details provided within the local area risk assessment, including the number of staff to be employed at all times, the training to be provided by staff, the applicant's understanding of the unique characteristics of the area, details of customer interactions and monitoring of customers.

As an operator in the area, it is our submission that the risk management measures put forward are very limited, not clear, and certainly not sufficient for a Gambling Act 2005 premises in this area.

There is no evidence to demonstrate that this applicant understands the unique characteristics of this area, and no evidence to suggest that the applicant will effectively promote the licensing objectives in Wembley.

The Gambling Commission guidance to local authorities sets out clearly in part 5 the principles to be applied by local authorities, and the Gambling Act 2005 sets out the principles to be applied by a licensing authority at s153.

The Gambling Commission's Licence Conditions and Codes of Practice (LCCP) set out the need for operators to consider local risks specifically. Social responsibility code 10.1.1 requires all premises licensees to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and to have policies, procedures and control



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measures to mitigate those risks. In undertaking their risk assessment, they must take into account the relevant matters identified in the licensing authority's statement of policy.

The relevant policy is Brent Statement of Principles for Gambling 2025-2028. It is a detailed policy with 15 separate sections, and 11 additional schedules.

The Applicant does not refer at all to the Brent Statement of Gambling Policy, it has not shown any understanding of the policy or implementing policy, and as a consequence, it is not an application which is consistent with the licensing objectives, Brent's or indeed the Gambling Commission LCCP, or the Gambling Commission's guidance.

The Statement of gambling policy is specific on requirements for Adult Gaming Centre applications, these are set out in the following paragraphs:

- 4.2 objective 1 -preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
- 4.4 objective 3 - protecting children and other vulnerable persons from being harmed or exploited by gambling
- 4.5 - protecting vulnerable adults.

There are a large number of requirements set out in these paragraphs, which all start with "licensees will be expected to demonstrate that they have given careful consideration .... "

It is clear from the application and Local Area Risk Assessment submitted that this applicant is not demonstrating that they have given careful consideration of the licensing objectives, and the measures required to support the licensing objectives, protect children and protect vulnerable persons.

Section 5.3 of the Statement of Gambling policy sets out information with regard to Local Area Risks Assessments. Unfortunately this Local Area Risk Assessment is not adequate or fit for purpose.

Section 8.2 of the Statement of Gambling Policy makes it clear that the licensing Authority will expect the Applicant to satisfy it that there will be sufficient measures in place to ensure that under 18s do not have access to the premises, and sets out appropriate measures, such as:

Entry control system

The number of staff on duty at any one time Door supervisors

Specific opening hours

Other requirements

This is a new applicant to the Adult Gaming Centre market which has no track record to rely on. The applicant seeks to rely on a very brief and generic Local Area Risk Assessment, and specific local issues are not dealt with. The Local Area Risk Assessment has not been properly prepared and does not take into account the Brent Statement of Gambling Policy at all.



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It is our assertion therefore that this application fails applying the principles to be applied under the Gambling Act 2005 s153, and should be refused.

We would like to stress that this is not a representation based on demand, but based on the principles set out in the Gambling Act s153, and the Applicant's apparent failure to apply Brent's Statement of Gambling Policy, and to understand local issues and have the relevant measures in place.

Yours sincerely,

Silvertime Amusements Limited