

Members of the Committee, thank you for allowing me the opportunity to address you today.

I would first like to make clear that I fully recognise the seriousness and importance of the licensing objectives under the Gambling Act 2005, namely the prevention of crime and disorder, ensuring gambling is conducted fairly and openly, and protecting children and vulnerable persons from being harmed or exploited by gambling. Our business fully supports those objectives, and we take them extremely seriously in the operation of our premises.

I would also respectfully ask the Committee to consider my own personal operational and regulatory history within the industry. Over a period spanning approximately 32 years, I have owned, operated, and successfully sold three gaming companies and during that time I have held three separate licences issued by the Gambling Commission without any regulatory issues. Throughout my time operating within the sector, I have maintained a strong compliance culture, worked constructively with regulators and licensing authorities, and operated within the framework and expectations of the Gambling Act and Gambling Commission requirements.

In addition, I have previously held an Adult Gaming Centre premises licence within Kilburn under the jurisdiction of Brent Council itself, again without any licensing issues, enforcement concerns, or regulatory problems arising during that operation. Brent Council has therefore previously entrusted me with the operation of a licensed Adult Gaming Centre within the borough without issue.

I respectfully submit that this is highly relevant because it demonstrates not only long-standing industry experience generally, but also direct experience operating compliantly within Brent's own regulatory and licensing framework.

I say that not simply as background information, but because licensing decisions must ultimately be evidence-based and operator-specific. My own professional history demonstrates long-standing experience operating responsibly and compliantly within regulated gambling environments.

However, it is equally important that this application is assessed on evidence, facts, and the specific operation before you today, rather than on broad generalisations concerning the gambling industry as a whole.

The statutory starting point under the Gambling Act is not whether gambling is universally supported as a matter of public opinion, but whether the licensing objectives can be upheld through appropriate regulation and conditions. Parliament deliberately adopted a permissive licensing framework under the Gambling Act 2005, where the legal test is whether the premises can operate consistently with the licensing objectives and within the framework of regulation, supervision, and enforceable safeguards.

Several of the objections and public policy documents referred to during these proceedings rely heavily upon wider concerns relating to gambling harms generally, particularly online gambling, mobile betting applications, digital casino-style gambling, gambling advertising, and social media exposure. Respectfully, those concerns are fundamentally different from the operation of a properly managed, licensed Adult Gaming Centre such as the one proposed here.

One of the documents relied upon is the Brent Joint Strategic Needs Assessment together with the report “Ending a Losing Streak” produced by More in Common. When those documents are examined carefully, it becomes immediately clear that their strongest criticisms are overwhelmingly directed towards online gambling and digital betting products. The reports repeatedly discuss concerns surrounding mobile phone gambling, online slots and roulette, unrestricted digital access, social media advertising, football sponsorship, and the ability for individuals to gamble anonymously and continuously from home at any time of day or night.

That environment is entirely different from a regulated Adult Gaming Centre.

There is also a very important distinction that must be recognised between bookmakers and Adult Gaming Centres. Although they both fall within the broader gambling sector, they are entirely different business models operating in very different ways and carrying very different operational characteristics and customer behaviours.

Bookmakers are fundamentally betting-led operations. Their core business model centres around sports betting, racing, odds-based wagering, online account betting, and historically high-speed betting products such as FOBTs and B2 machines. Betting shops are often heavily linked to live sporting events, mobile betting applications, online account integration, televised betting markets, and rapid transactional gambling linked to external sporting outcomes.

An Adult Gaming Centre operates entirely differently.

AGCs are machine-based leisure environments operating within fixed premises and under a different style of customer interaction and supervision. Customers are physically present within a controlled adult-only environment where staff interaction, customer monitoring, welfare observation, and intervention are all possible in real time. AGCs do not operate as sports betting venues, they do not revolve around live racing or football betting markets, and they are not structured around online account gambling or remote digital wagering.

Critically, Adult Gaming Centres have never operated FOBTs or B2 machines. Those products were historically associated with licensed betting offices and bookmakers, not AGCs. That distinction is highly significant because many of the public-health criticisms and political concerns referred to throughout the JSNA and other objection materials are specifically rooted in historical concerns relating to betting-shop FOBTs and high-stakes betting products rather than Adult Gaming Centre operations.

Indeed, one of the most heavily relied upon and emotive claims within the Brent JSNA is the statement that FOBTs and B2 machines are “more addictive than heroin.” However, that statement specifically relates to betting-shop products which have never operated within Adult Gaming Centres. Accordingly, it is incorrect and unfair to conflate those historic betting-shop concerns directly with modern AGC operations.

Many of the public concerns raised in reports such as these — including concerns surrounding football sponsorship, online gambling apps, social media betting advertisements, rapid mobile gambling, unrestricted digital access, and FOBT-related harms — therefore relate far more closely to bookmakers and online operators than they do to Adult Gaming Centres.

Similarly, much of the historical criticism surrounding FOBTs and B2 machines has traditionally related to betting shops rather than AGCs. The period that gave rise to national concern regarding FOBTs related primarily to high-stakes betting shop products where stakes of up to £100 every 20 seconds were previously permitted. Those concerns were overwhelmingly associated with betting-shop environments rather than supervised Adult Gaming Centres, and the regulatory framework surrounding those products has since materially changed.

The Brent JSNA itself expressly recognises that gambling is not one single homogenous activity and that different gambling products carry different levels of risk. The report specifically acknowledges that gambling encompasses “a wide range of products, each with different rules and risk levels.”

That is an important admission because it directly supports the position that Adult Gaming Centres cannot properly or fairly be treated in the same way as online gambling platforms, betting shops, or other entirely different gambling sectors. The report itself therefore accepts that broad assumptions cannot simply be applied across all forms of gambling without distinction.

The JSNA also expressly acknowledges that in-person gambling remains popular and widely participated in across society. That is significant because it reinforces the fact that land-based gambling premises such as Adult Gaming Centres continue to operate as lawful and recognised leisure premises within the statutory framework established by Parliament.

The Brent JSNA also expressly recognises the distinction between betting shops and Adult Gaming Centres within Brent’s own planning framework. The report confirms that Brent Local Plan policy separates betting shops and Adult Gaming Centres into different categories and acknowledges that appeal decisions have accepted that they are materially different uses.

Importantly, Brent’s own Local Plan already contains specific planning controls designed to prevent overconcentration and clustering of gambling premises, including frontage percentage limits and minimum separation requirements between premises.

That is highly significant because it demonstrates that even within Brent’s own adopted policy framework, bookmakers and Adult Gaming Centres are not viewed as interchangeable operations. They are recognised as distinct premises types with different operating models, different customer behaviours, and different planning considerations. The borough already possesses planning mechanisms specifically designed to control concentration where appropriate.

An Adult Gaming Centre is a fixed, supervised, adult-only premises operating within a strict legal and regulatory framework. Unlike online gambling, customers cannot gamble anonymously from their bedroom or through unrestricted mobile applications. Unlike bookmakers, the operation is not centred around sports wagering, live betting markets, or rapid account-based betting activity linked to external events.

Customers within an AGC are physically present, visible to trained staff, monitored through CCTV, and operating within a controlled environment where interaction, supervision, and intervention are all possible in real time.

Our premises will operate with strict age verification procedures, controlled adult-only access, facial recognition CCTV at the entry point and further CCTV coverage throughout the premises, safer gambling policies, staff welfare intervention training, self-exclusion systems, incident recording procedures, and full compliance with the Gambling Commission's Licence Conditions and Codes of Practice. These are robust and enforceable safeguards which simply do not exist to the same degree in the betting and online gambling environments.

It is also important to note that throughout this process we have worked proactively and constructively with the responsible authorities. Prior to submitting the application, we attempted to engage in a pre-application consultation with the Police and offered conditions which had previously been requested from Chongie Amusements Limited in relation to comparable operations.

In response, we received the following reply from the Police:

“In short we are going through a re-structure here in the Met meaning I am currently doing 2/3 roles and haven't got time to do the research you are asking for. I can only suggest you submit the application in the normal way.”

In light of that response, we proceeded with the application in the usual way and nevertheless proposed a comprehensive suite of operating conditions within the application itself.

Notably, the conditions ultimately agreed by Brent Council were, in the round, largely reflective of and consistent with those already volunteered within the application. Likewise, the Police also proposed conditions to be attached to the licence, and we agreed to those immediately and without hesitation. That is because we are not resistant to regulation or scrutiny. On the contrary, we actively welcome robust safeguards and regulatory oversight because responsible operation and compliance are fundamental to how we conduct our business.

The Police expressly confirmed during the consultation process that they were content with the conditions already proposed within the application. They simply sought the addition of further measures designed to ensure continuity of safe operation within the venue.

Those measures were intended to ensure that, in circumstances where a member of staff may be delayed, unwell, absent, or temporarily taking a break, the premises could continue to operate without inadvertently breaching licence conditions. They also provided an additional layer of operational resilience and security, further safeguarding both staff and customers at all times.

Of particular relevance is the fact that at no stage during the consultation process was there any indication from the Police of increased concern regarding the operation of an Adult Gaming Centre itself. The focus of the discussions was operational continuity, resilience, and practical safeguarding measures rather than any allegation that the premises, or AGC operations generally, inherently gave rise to crime, disorder, or heightened risk.

I respectfully submit that the willingness of both the local authority and the Police to resolve matters through agreed conditions is highly significant. It demonstrates that the statutory authorities tasked with assessing crime prevention, public safety, operational management, and compliance were ultimately satisfied that any concerns raised could be properly and

proportionately addressed through enforceable licence conditions and robust operating procedures.

Conditions exist precisely as the legal mechanism through which perceived risks are managed and mitigated within the licensing system. The fact that conditions were agreed and accepted without hesitation demonstrates both our willingness to operate transparently and the confidence of the responsible authorities that the licensing objectives can be fully upheld through appropriate safeguards.

Members should also note that the Brent JSNA itself expressly confirms that the Gambling Act 2005 is “a permissive piece of legislation.” Parliament deliberately chose a regulatory framework based upon control, supervision, licensing, and compliance rather than prohibition. Adult Gaming Centres are therefore lawful and recognised premises within that statutory framework, provided they uphold the licensing objectives.

The report further acknowledges that local authorities are not entitled to refuse premises licences simply because there may be objections to gambling generally, because there are concerns about overconcentration, or because there is community opposition to gambling premises in principle. The JSNA expressly states that local authorities “are not currently able to decline a premises licence based solely on the view that there are too many in the area or because there is community backlash.”

That is an extremely important point because the Committee must determine this application based upon evidence relating to the licensing objectives and the operation of this specific premises, rather than on generalised opposition to gambling or wider political debate surrounding the gambling industry.

It is also relevant to note that this particular premises previously traded as a betting shop and, as far as records indicate, did not suffer from any regulatory issues.

The Brent JSNA also contains another very significant admission which, in my submission, must not be overlooked. The report states that “since no issues have been reported across the 80-odd gambling premises in Brent, in at least the last five years, none have had to face any scrutiny on whether the preventative measures in place have worked to deter crime and protect vulnerable populations.”

That statement is highly material. Brent’s own evidence base therefore acknowledges that there has not been a pattern of reported operational failures across existing gambling premises requiring formal scrutiny or enforcement action in recent years. In my submission, that significantly undermines any suggestion that licensed gambling premises inherently fail to uphold the licensing objectives or that Adult Gaming Centres should automatically be assumed to create crime, disorder, or exploitation.

The additional Brent Gambling Harm Data Profile mentioned by objectors is similarly based on borough-wide population modelling and statistical estimates rather than premises-specific evidence. The document itself expressly acknowledges that the figures are “indicative estimates” based upon modelling techniques and broad demographic assumptions rather than evidence concerning this individual premises or this operator.

Area-wide public health modelling and borough-level prevalence statistics cannot automatically justify refusal of an individual premises licence application where there is no evidence that this operator or this premises has failed, or is likely to fail, to uphold the licensing objectives.

The More in Common report itself also acknowledges that the public does not view all forms of gambling equally. The report repeatedly recognises that many people distinguish between low-risk, socially managed, in-person gambling environments and what they regard as higher-risk forms of online or digital gambling. It specifically notes that many people view social, supervised, lower-stakes gambling very differently from isolated digital gambling taking place anonymously through mobile phones and online platforms.

That distinction is highly significant in the context of this application because even the public opinion evidence relied upon by objectors itself accepts that not all gambling environments are viewed equally and that there is a clear difference between supervised in-person gambling and unrestricted online gambling.

The report's strongest concerns relate to unrestricted online gambling, rapid digital betting behaviour, gambling advertising, and exposure of children to gambling content online and through sports sponsorship. Those concerns are not applicable to this premises. This is an adult-only environment where under-18s are prohibited entry entirely. Children will not be permitted access. Unlike online gambling platforms, this premises operates within a physically controlled environment where customer behaviour can be monitored and where intervention is possible if concerns arise.

The report also devotes significant attention to gambling advertising, online targeting, and football sponsorship. Again, respectfully, those issues have no relevance to the determination of this specific premises licence application. The Committee is not being asked to determine national policy on advertising, online gambling reform, or sports sponsorship. The Committee is being asked to determine whether this specific premises is likely to uphold the licensing objectives under the Gambling Act 2005.

That assessment must be evidence-based and premises-specific.

Critically, both the Brent JSNA and the More in Common report are not enforcement reports, licensing audits, crime assessments, or operational reviews of this premises. They are broad public health and public opinion documents. They do not identify this premises, they do not identify operational failings by this operator, and they do not provide evidence that this premises will cause crime, disorder, exploitation, or harm. They do not demonstrate breaches of licensing objectives, nor do they establish that a properly managed Adult Gaming Centre operating within the framework of the Gambling Act 2005 inherently undermines those objectives.

Indeed, recent authority from the Highbury Corner Magistrates' Court in *Future Leisure Limited v London Borough of Haringey* strongly reinforces this principle. In that case, the Court allowed an appeal relating to a 24-hour Adult Gaming Centre application and held that speculative concerns about what "might happen" could not outweigh actual operational evidence, safeguards, and a proven compliance history.

The Court reached that conclusion despite evidence of deprivation, vulnerability concerns, public-health evidence, and local objections similar to those raised in this matter.

The Court expressly recognised that public health concerns and generalized fears alone were insufficient where there was no evidence that the operator had failed to uphold the licensing objectives or that safeguards were ineffective.

That authority is highly relevant here.

Many of the objections before this Committee are similarly based on broad public-health concerns, assumptions, or speculation about what could theoretically occur, rather than on actual evidence relating to this operator or this premises.

Licensing decisions must be evidence-based.

There is no evidence before this Committee that this operator has failed to uphold licensing objectives, no evidence of crime or disorder associated with our operation, no evidence of safeguarding failures, no evidence of complaints arising from our operation, and no evidence that the robust measures proposed are inadequate.

Our operational history, compliance standards, regulatory track record over more than three decades, previous successful operation within Brent itself, and willingness to accept stringent conditions all demonstrate the exact opposite.

Indeed, the reports themselves repeatedly acknowledge that many members of the public still regard some forms of gambling as legitimate leisure activity when conducted responsibly and in moderation. They also recognise that many people continue to believe that personal responsibility remains an important factor in gambling behaviour.

Members should also note that the reports frequently conflate entirely different sectors of the gambling industry into one broad narrative, grouping together online casinos, mobile gambling applications, betting shops, sports betting, gambling advertising, and physical premises. However, these sectors are fundamentally different in operation, risk profile, customer interaction, regulatory oversight, and safeguarding capability.

A supervised Adult Gaming Centre with trained staff, controlled entry, CCTV monitoring, welfare procedures, and direct customer interaction is entirely different from an anonymous online gambling platform accessible 24 hours a day through a mobile phone.

That distinction is highly material.

The Gambling Act 2005 itself is founded upon the principle of regulation and control, not prohibition. Parliament expressly created a lawful framework for Adult Gaming Centres to operate subject to licensing conditions, regulatory oversight, and compliance obligations. The legal question before this Committee is therefore not whether some people object to gambling generally, nor whether there are wider political debates concerning gambling policy.

The question is whether there is evidence that this specific premises, operated in the manner proposed, is likely to undermine the licensing objectives.

No such evidence has been presented.

There is no evidence of operational failings. There is no evidence of crime linked to this operator. There is no evidence of safeguarding failures. There is no evidence that the agreed conditions and extensive safeguards would be ineffective.

What has instead been presented are broad societal concerns relating primarily to online gambling, gambling advertising, and national policy debates. Those are matters for Parliament and national regulators. They are not direct evidence against this individual premises application.

Our operation will be professionally managed, closely supervised, fully compliant with Gambling Commission requirements, and operated with a strong commitment to safer gambling, customer welfare, and regulatory compliance. We are not seeking to avoid regulation. We welcome regulation. We support responsible gambling measures, safeguarding obligations, staff training, customer protection procedures, and proactive welfare intervention where appropriate.

For those reasons, I respectfully submit that this application should be determined based on the actual evidence relating to this premises, together with the robust operational safeguards proposed, rather than broad generalised concerns relating predominantly to online gambling and national policy issues which are materially different from the operation of a regulated Adult Gaming Centre.

Thank you, Members.