

**From:** Krupesh Hirani

**Sent:** 23 May 2026 11:44

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

**Subject:** RE: New AGC - Vault Casino, 574 High Road, HA0 2AA - 37927

Thank you for forwarding the applicant's additional submission.

Having reviewed the response in detail, I do not wish to withdraw my objection to the proposed Adult Gaming Centre at 574 High Road, Wembley.

While I acknowledge the applicant has now provided further operational detail and accepted a series of conditions, these measures do not adequately address the fundamental issue at the heart of my representation: the cumulative concentration of gambling premises in this immediate locality and the impact this has on vulnerable residents, children, and the wider character of Wembley High Road.

The applicant's submission largely relies on generic assertions regarding compliance with Gambling Commission requirements and the existence of standard operating procedures. However, compliance with minimum regulatory standards does not automatically mean an application is reasonably consistent with the licensing objectives in a particular local context.

My objection remains grounded in the licensing objectives under the Gambling Act 2005, particularly:

- the prevention of gambling being a source of crime or disorder; and
- the protection of children and vulnerable persons from being harmed or exploited by gambling.

The applicant repeatedly characterises objections as “speculative” and “template based”. I reject that characterisation. My representation was based specifically on Brent's own Joint Strategic Needs Assessment (JSNA), the concentration of gambling premises in the immediate vicinity of this site, and the well-documented relationship between deprivation and gambling harm.

Importantly, the applicant's own submission confirms several matters that reinforce concern rather than alleviate it:

1. The premises intend to operate on a 24-hour basis.  
A 24/7 gambling premises in an area already saturated with gambling establishments materially increases the availability and visibility of gambling activity at all hours. The fact that additional security measures are proposed, including SIA staff, maglocks, panic alarms, CCTV monitoring, locked toilets, and lone-worker alarms, itself demonstrates the extent of the operational risks anticipated.
2. The applicant acknowledges nearby gambling clustering.  
The submission explicitly recognises the concentration of gambling premises in the locality. My concern is not simply the operation of one premises in isolation, but the continued clustering effect on Wembley High Road. Residents experience these premises collectively, not individually.
3. The applicant places significant weight on there being no formal police objection.  
However, the absence of a police objection is not determinative. The Licensing Authority must independently consider whether granting the licence is reasonably consistent with the licensing objectives and Brent's Statement of Gambling Principles. The Act clearly provides discretion to refuse applications where local risks and cumulative impacts are considered significant.
4. The applicant seeks to dismiss Brent's JSNA evidence.  
The JSNA remains Brent Council's own evidence base regarding gambling harms and local vulnerability. It identifies gambling harm as a public health concern and highlights the relationship between deprivation and gambling exposure. I do not accept that this evidence should be discounted simply because the applicant disagrees with aspects of its methodology.
5. The argument that AGCs are heavily regulated does not answer the central concern.  
Many heavily regulated activities can still produce harmful cumulative impacts when concentrated in one locality. The question before the Licensing Authority is not whether regulation exists in theory, but whether another gambling premises in this particular location is appropriate and consistent with the licensing objectives.

I am also concerned by the applicant's attempt to frame opposition from elected representatives and residents as somehow carrying reduced weight because similar concerns have been raised by multiple parties. In reality, the consistency of objections from local residents, ward councillors, Members of Parliament and elected representatives reflects the strength and breadth of local concern regarding the overconcentration of gambling premises in Wembley.

The "aim to permit" principle under section 153 of the Gambling Act does not create an automatic presumption in favour of every application regardless of local circumstances. Licensing Authorities are still required to determine whether granting a licence is reasonably consistent with the licensing objectives and local gambling policy. In my view, this application fails that test.

For these reasons, I maintain my objection and respectfully request that this application is refused.

Best wishes,

Krupesh Hirani AM

**Krupesh Hirani AM**

London Assembly Member for Brent and Harrow

**LONDONASSEMBLYLABOUR**

City Hall, Kamal Chunchie Way, London, E16 1ZE