

From:

Sent: 30 April 2026 16:43

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

I wish to raise critical concerns regarding its substantive content and the applicant's failure to accurately assess local risks. Furthermore, I am submitting evidence from other Local Authorities which demonstrates a clear and successful legal path for refusing such applications.

1. Inadequate Local Risk Assessment

The Risk Assessment report provided by Arcadia Casino Ltd remains fundamentally flawed. It contains an incomplete list of local primary schools and early-years providers in the immediate vicinity of 1 Walm Lane. For a licence under the Gambling Act 2005, the applicant has a statutory duty to demonstrate how they will protect children and vulnerable persons from being harmed or exploited by gambling. By failing to even identify the correct proximity of local educational institutions, the applicant has failed to meet the basic threshold of a competent risk assessment.

2. The Sheffield Precedent: Comprehensive Evidence

I have been in correspondence with the licensing team at Sheffield City Council regarding their successful challenges to Adult Gaming Centres (AGCs). Sheffield has led the way in demonstrating how Local Authorities can robustly defend their high streets against gambling proliferation.

Please find attached a comprehensive PowerPoint presentation and detailed briefing provided to me by the Sheffield Licensing Team. They are rightfully proud of their work in protecting their communities and have encouraged other authorities to adopt their evidence-led approach. I trust this data will be of significant value to the Brent Licensing Committee in assessing the socio-economic impacts of AGCs.

3. The Spelthorne Refusal: Same Applicant, Same Outcome

I would also like to bring to your attention a recent development in Spelthorne, Surrey. I have held an email exchange with their licensing department, which confirms that an Adult Gaming Centre application brought by Golden Slots (Southern) Ltd was recently refused.

Notably, the applicant chose not to pursue an appeal against that refusal. This confirms that when an authority conducts a rigorous assessment of local harm, the "Aim to Permit" is not an absolute requirement, and refusals are both legally sustainable and defensible.

4. Duty to the Local Community

The cumulative impact of high-stakes gaming machines in an area already facing significant deprivation cannot be ignored. I urge the Licensing Authority to scrutinise this application with the same level of rigour demonstrated by Sheffield and Spelthorne.

I look forward to these points, and the attached evidence, being included in the full report for the Licensing Committee.