

From: Sent: 30 April 2026 16:44

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

Cc:

Subject: Fwd: Learning from Sheffield: Inquiry regarding Public Health evidence in AGC Licensing Refusals

----- Forwarded message -----

From:

Date: Mon, 20 Apr 2026 at 16:59

Subject: RE: Learning from Sheffield: Inquiry regarding Public Health evidence in AGC Licensing Refusals

To:

Hi and colleagues

Thank you for getting in touch.

Every application and location is different but I have tried my best to respond to your queries. I think Will has sent you our slides on the Royal Amusements case which should be useful but reattached just in case – the related judgement provides case law that can be cited as and when relevant.

The slides contain links to the original objection from Public Health which pre-dates my time in the service but I've attached it for ease – there were also maps of the sensitive locations and areas of risk but the list is possibly more helpful.

Please note this is various colleagues' work, not mine - I got involved at the point of the court case. We do recognise that PH isn't a responsible authority by the way, but that's another story. The only thing we do differently now is make objections through a Licensing Safeguarding Officer and refer very specifically to our local policy and sections within these.

Hope this helps and best of luck.

Kind regards

Health Improvement Principal (Public Mental Health)

Public Health & Integrated Commissioning

Sheffield City Council

From:


Sent: 20 April 2026 10:32

To:

Subject: Learning from Sheffield: Inquiry regarding Public Health evidence in AGC Licensing Refusals

Dear

I am writing to you as a Green Party candidate in the Kilburn ward of Brent, London.

 recommended I email you.

We have been following the recent legal success of Sheffield City Council in the case of Royal Amusements v Sheffield City Council with great admiration. On behalf of our local team, I want to commend you and your colleagues for your bravery and tenacity in defending that refusal notice—it has provided a beacon of hope for communities across the country.

We are currently facing a very similar challenge. An application has been lodged for an Adult Gaming Centre (AGC) at [1 Walm Lane, Willesden Green](#), a site situated at a sensitive community gateway near schools, nurseries, and local food banks.

Like Sheffield, our community is struggling under the weight of a severe cost-of-living crisis. We have seen rents in this ward increase by 27% in just three years, and our local food banks are seeing record demand. Despite this, the applicant's "Local Area Risk Assessment" paints a picture of a "gentrified" area, relying on 2021 Census data which we believe is now fundamentally obsolete. It fails to account for the rapid inflationary pressures and geopolitical shifts that have occurred between 2021 and 2026, which have disproportionately impacted our residents' financial resilience.

As we prepare our representation for the Licensing Committee, I would be incredibly grateful if you could share any insights on the following:

- Evidence Weighting: How did your team effectively argue that the "cumulative impact" and socio-economic vulnerability of the population should take precedence over the "Aim to Permit" principle in Section 153 of the Act? Our argument – certainly by the time

of the court case – was underpinned by the position that even with (licensing) conditions in place people will be harmed and focused on proposed location of the new AGC and the (substantial) volume of sensitive locations and areas of risk within both the immediate vicinity of the location and in very close proximity to it. There was a stronger focus on vulnerable persons than children but both are important.

- Data Timeliness: Did you encounter, and successfully challenge, the use of outdated census data (like 2021) to mask present-day vulnerability?

We didn't encounter this issue. The original risk assessment from the applicant in the Sheffield AGC was very poor – I get the impression that operators have upped their game with regard to risk assessments since the Sheffield court case.

HOWEVER the proposed location for the AGC in Sheffield is NOT in a deprived area - it is in the fifth decile (decile 5) of the IMD (although Sheffield city centre where the proposed AGC was located is fringed by deprived areas). I think the location you are looking at is more deprived than the one we were dealing with (decile 3 and also income deprivation decile 3) from a quick search. Deprivation wasn't the main thrust of our argument/case; it was the above that mattered most i.e. the volume of sensitive locations and areas of risk and with this that vulnerabilities to gambling harms may not always be visible (which the Gambling Commission themselves state). There may be other things to think about e.g. does the area in which the proposed AGC would be located have a higher than average proportion of young residents (24 and under) or even young male residents? Or perhaps of students? There is particular concern about these groups and vulnerability to gambling harms.

- Defining "Sensitive Locations": Beyond schools, what specific health-related indicators (e.g., proximity to debt advice or mental health services) proved most persuasive to the District Judge in your case? Our Council's Gambling Policy has a list of headings of sensitive locations and areas of risk frequented by children and vulnerable persons (identified in accordance with evidence of potential vulnerability to gambling harms) – we used these and then mapped relevant premises and places (please note some of the mapping work had been done previously). I appreciate that not all policies present/cover this subject in the same way. I've looked at yours and it seems to include the following:

- Bank/Building Societies • Education Establishments • Places of Worship • Betting Shops, Adult Gaming Centres (AGC's) & Bingo premises • Premises Licensed under the Licensing Act 2003 • Pay day/Loan establishments/Pawn shops/Cash convertors • Vulnerable Housing/Emergency accommodation/Supported Housing • Substance Misuse & Drug & Alcohol recovery services • GP's/Surgery • Job Centres

[Statement of Gambling Principles – 2025-2028](#) (p.30)

On a related note, we haven't risk profiled Sheffield LA area in terms of gambling harms i.e. for a Local Area Profile and are not planning to.

Any guidance or shared documentation you could provide would be an immense support to our community as we fight to ensure our high street remains a resource for residents, rather than a source of harm. Be really clear that AGCs SOLELY provide Electronic Gaming Machines. These are one of the gambling products most strongly associated with gambling harms and gambling addiction and deliberately designed to keep people playing.

On a wider note, cite what it says in the Royal Amusement's vs. Sheffield City Council judgement about public health being a legitimate concern under the Gambling Act (see slides and link to judgement).

Thank you for your time and for the vital work you continue to do in Sheffield. I have already emailed your licensing and legal teams a separate special questions.

With best wishes,

Green Party Candidate for Kilburn