

To: Brent Licensing Authority

Re: Representation objecting to application for an Adult Gaming Centre Premises
Licence under the Gambling Act 2005

Applicant: Silvertime Amusements Limited

Premises: Silvertime Amusements, 446 High Road & 8 Park Lane, Wembley, HA9 6AH

We write to object to the application by Silvertime Amusements Limited for an Adult Gaming Centre (AGC) at 446 High Road and 8 Park Lane, HA9 6AH. The applicant currently operates under a Bingo license at 446 High Road, with the existing Bingo licence understood to be surrendered should the new AGC licence be granted. This representation is made on the basis that granting this application would not be consistent with the licensing objectives under the Gambling Act 2005, namely:

- preventing gambling from being a source of crime or disorder
- ensuring gambling is conducted in a fair and open way
- protecting children and other vulnerable persons from being harmed or exploited by gambling

To give some background, Brent is already disproportionately affected by gambling-related harms and granting Silvertime a new AGC premises licence could compound this. Brent's Joint Strategic Needs Assessment (JSNA) on Gambling (2023) highlights that Brent not only has one of the highest numbers of gambling premises in London and the country, but that it is also among the areas with the highest number of people experiencing the most severe consequences from gambling. Using the Problem Gambling Severity Index (PGSI), a common scale used in many official surveys on gambling, the JSNA reported that 17.1% of residents were considered to be gambling with at least a low-level of risk (vs 13.4% in the rest of the country), while 6.2% were considered to be gambling with the highest level of risk - more than twice the national average of 2.9%. Latest figures since then show that those in Brent continue to experience a disproportionate level of harm, recording a much steeper rise in 'at-risk' gambling than the national average. While national levels of 'at-risk' gambling have risen only marginally (13.4% to 14.7%), Brent has experienced a marked increase from 17.1% to 24.9%. This divergence occurring in a borough characterised by its high concentration of land-based gambling premises suggests a local environment with heightened exposure to harm.

The granting of this licence would extend the applicant's existing premises on Wembley High Road into the adjoining premises at 8 Park Lane, with both addresses located within the Wembley Hill ward. The proposed application would licence the expanded premises as an Adult Gaming Centre, establishing gaming-machine gambling as its primary licensed activity and removing the requirement for substantive bingo provision. Given the existing concentration of gambling premises in the area and the heightened vulnerability

to gambling-related harm, which we outline in greater detail below, we have significant concerns about expanding dedicated gaming-machine gambling provision at this location. We set out below why we consider the application to be inconsistent with the licensing objectives.

1. Preventing gambling from being a source of crime or disorder

According to CrimeRadar data, 8,441 crimes were recorded within the surrounding area over the last 12 months, giving the area a safety score of only 8/100. The five most commonly recorded crime types included 'violent crimes', 'anti-social behaviour', 'shoplifting', 'theft from person', and 'other theft'. This existing level of crime and disorder is relevant when considering the potential risks associated with expanding gambling provision at this location. As Brent's JSNA highlights, there is evidence of an association between criminal activity and gambling behaviour. This is especially the case for crimes such as theft or fraud, where gambling has been found to be an underlying motivation for offending, while gambling-related harm can also contribute to violent interpersonal crimes like domestic abuse.

Unfortunately, the relationship between gambling and crime is not always readily identifiable in routinely collected crime data. Where offending is connected to gambling, the underlying gambling-related motivation or harm may not be recorded, particularly as gambling is not routinely identified or screened for in these types of assessments. As a result, available crime statistics may not fully capture the extent to which gambling contributes to or intersects with offending. Nevertheless, the local crime profile data shows an overlap between some of the offences most commonly associated with gambling-related harm and those most commonly recorded in Wembley.

Qualitative evidence from Brent residents also describes experiences of disorder in and around gambling premises. Residents have described groups congregating and drinking outside gambling premises alongside other forms of anti-social behaviour. Such experiences illustrate the type of lower-level disorder that may affect residents' perceptions and experiences of their local environment without necessarily resulting in an official report to the police. Importantly, residents describe these experiences even where premises have been recorded as compliant with their existing licensing requirements.

2. Ensuring that gambling is conducted in a fair and open way

The licensing objective of ensuring that gambling is conducted in a fair and open way concerns the fairness and transparency of the gambling offered to customers. This includes whether relevant information is presented clearly and transparently, enabling

customers to understand the gambling in which they are participating and make informed decisions. The Social Market Foundation's report, *High Streets at Stake*, raises concerns within the AGC sector, including evidence relating to the presentation of information to customers and practices concerning compliance with statutory machine ratios. The report concludes that the operation of AGCs raises questions under the 'fair and open' licensing objective.

While the applicant demonstrates some understanding of its customer base and states that multilingual resources will be available for providing safer gambling advice and information on support services, it is not clear from the application whether equivalent consideration has been given to ensuring that information about the rules and terms and conditions of the gambling offered are equally accessible and clearly presented. Should a licence be granted, we would expect key information relevant to customers' participation to be clearly and accessibly presented at the point of play, rather than being available only as supplementary information that customers must seek out.

3. Protecting children and other vulnerable people from being harmed or exploited by gambling

"Gambling felt like something I could lean on when things went wrong."

Student

Brent is the fourth most deprived borough in London, with a younger-than-average and highly ethnically diverse population. This demographic profile means Brent is home to a high concentration of population groups known to be at greater risk of gambling-related harm. These vulnerabilities are particularly relevant to Wembley and therefore to this application. The applicant's own LARA identifies the locality as one of the more ethnically diverse parts of the borough and as having a relatively young population, with residents predominantly aged between 20-39. This is significant given evidence that:

- 21% of 18–24 year olds are classed as "at-risk" gamblers, compared to 10% of those aged 55–64
- 10.6% of people from minority ethnic groups are considered to be 'problem gamblers', compared with 3% of white groups

Our strongest objection to this application is that granting the AGC premises license would be inconsistent with the licensing objective of protecting children and other vulnerable persons from being harmed or exploited by gambling. While gambling-related harm can affect anyone, the evidence consistently shows that harm is not equally distributed and tends to fall disproportionately on groups already experiencing greater

vulnerability and disadvantage. In fact, research shows that the groups least likely to gamble overall often experience some of the most severe harms if they do gamble.

The applicant is seeking an AGC premises licences covering 446 High Road and the adjoining 8 Park Lane. Its LARA states that gambling premises form part of the wider mix of town-centre commercial uses, rather than constituting a dominant or clustered feature, and that these premises are well dispersed across the locality.

However, this characterisation does not appear to reflect the high availability and close proximity of gambling premises in the vicinity of the proposed venue, nor does it reflect the perceptions of residents. The existing Silvertime premises sits within Wembley Hill ward, which currently hosts seven licensed gambling premises, placing it among the wards with the highest numbers of gambling premises in the borough. Wembley High Road also extends into Wembley Central ward which has a further six licensed gambling premises, five of which are situated on the same High Road as the existing site. Three of these premises are currently licensed to Silvertime Amusements Limited. This means that on this High Road, there are 10 licensed places to gamble within a 0.3miles stretch, equivalent to around a 7-minute walk according to Google Maps. Of these 10, four are licensed as Adult Gaming Centres and six as betting shops. One of the AGCs was granted a premises licence only recently and appears not yet to have opened. The existing Silvertime premises seeking a new AGC licence at 446 High Road is itself less than 500 feet from another Adult Gaming Centre.

Research suggests that accessibility, proximity and concentration of gambling opportunities can be relevant to the risk of gambling-related harm. Evidence examining the geographical distribution of gambling premises has identified relationships between gambling behaviour and proximity to gambling venues. For example, studies have found:

- People living closer to gambling venues (less than 0.7km away) are twice as likely to be ‘problem gamblers’ than individuals living further away (more than 3.1km away)
 - This is particularly relevant to the proposed location, as the applicant’s own LARA identifies residential properties directly above the premises
 - This should also be considered alongside the wider availability of gambling in the locality, with at least 10 licensed premises already located along a 0.3miles (0.48km) stretch, well within the 0.7km described in the research as “closer”
- Among young people aged 18-21 encountering gambling problems rather than never, gambling has been found to increase by 39% for each additional form of gambling operator located within their local area

- This finding is particularly pertinent given the applicant's own identification of the locality having a predominantly young population and the presence of multiple gambling operators within a very short distance in this area
- Higher concentrations of gambling premises are associated with higher rates of 'problem gambling'
 - Brent's experience is consistent with this wider evidence, with a high concentration of land-based gambling provision coinciding with disproportionately high levels of 'at-risk' gambling
- Those living in more deprived areas are more likely to gamble on faster-paced games such as scratch cards and slot machines, which are known to be more addictive
 - The proposed premises are situated within an area of relatively high deprivation in Wembley. While this is not among the most deprived parts of Brent overall, the local deprivation profile nevertheless indicates socioeconomic vulnerability within the surrounding population
 - This is also directly relevant to the nature of the proposed premises, where the core gambling offer would be gaming machines, commonly referred to as slot machines

A significant emphasis is placed on staff training. The application states that staff will be trained to recognise signs of repetitive or excessive play but provides little detail on how these indicators would be assessed in practice or what patterns of play the operator would regard as excessive and requiring intervention. Similarly, staff are expected to identify changes in customers' pace of play, attention or responsiveness, without the application clearly setting out which types of changes would trigger intervention or escalation. Similar reliance on staff judgement is apparent in provisions referring to whether an individual "appears" to be under the influence, or to offering self-exclusion "to those that need it" or "if required". The difficulty is that, as set out above, an individual experiencing gambling-related harm may not necessarily display readily identifiable signs or even recognise themselves as needing support.

This reliance on staff awareness makes staffing levels and capacity to monitor customer behaviour particularly important. Although the application states that staffing levels will be risk-assessed and taken seriously, it does not appear to provide expected minimum staffing levels at different times or sufficient detail on the circumstances that would lead to increased staffing. This makes it difficult to assess how the proposed monitoring and intervention measures would operate in practice.

Other safeguards rely on signage and safer gambling information being available within the premises. These measures are valuable, but their effectiveness necessarily depends

to some extent on customers noticing, engaging with and acting upon that information. They therefore cannot be relied upon, particularly for individuals who have not yet recognised that their gambling is becoming harmful. There are similar limitations to age-related safeguards. Research published by the Social Market Foundation found that 27% of surveyed 14 to 17-year-olds said they knew another young person who had visited an AGC. This does not necessarily demonstrate that the proposed premises would fail to enforce age restrictions, but it does demonstrate that these safeguards are not always enough to prevent children and young people from entering.

More fundamentally, however, even robust premises-level safeguards cannot fully mitigate the wider cumulative risks identified throughout this representation. Conditions, staff training, customer interaction, self-exclusion and safer gambling information can reduce risks associated with the operation of an individual premises, but they cannot remove the wider effects associated with gambling-related harm. This is particularly important in Wembley where the proposed AGC would operate, given that the characteristics of the local area combine to create a heightened risk of gambling-related harm.

Furthermore, as the applicant acknowledges, the presence of multiple gambling premises along the High Road creates potential cumulative impact risks. The LARA identifies risks including anti-social behaviour, opportunistic crime and exposure of vulnerable individuals to gambling opportunities. However, it gives less consideration to the wider potential impacts, particularly on health, which premises' safeguarding measures cannot necessarily prevent.

Gambling is commonly described as a 'hidden addiction', as harmful behaviours can often develop gradually without any overt warning signs. Unlike alcohol and substance addictions, there may be few outward signs that an individual's gambling has become harmful. This makes prevention particularly important, including consideration of the normalisation and visibility of gambling within everyday environments. A high concentration of readily accessible gambling opportunities can contribute to perceptions of gambling as an ordinary and relatively risk-free activity. This presents a particular challenge for people who may already be experiencing harmful consequences from gambling but have not yet recognised it as a problem, as well as populations that may be particularly susceptible to its influence, including children and young people. For people already experiencing gambling-related harm, the ready availability and visibility of gambling can present an additional challenge.

Research published by the Social Market Foundation found that 44% of young people aged 14 to 17 agreed that the presence of gambling venues near where they live makes people their age more interested in gambling. This suggests that the impact of gambling

premises on children and young people is not limited to whether they are able to enter the premises or gamble themselves. Rather, their presence and visibility within the local environment may influence a young person's interest in gambling even where age-restriction and safeguarding measures are operating as intended. This is important when considering the mitigations proposed by the applicant. While the LARA sets out measures intended to ensure that promotional materials do not appeal to children or vulnerable persons, such measures cannot fully address this potential impact.

“You’ve got it in your face all the time – high road, on your phone, it’s everywhere. How do you overcome that when wherever you go, it’s right there, staring in your face?”

Peer Support Group Member to drug and alcohol service users in Brent

As the applicant acknowledges, the high concentration of gambling venues along the High Road creates the potential for cumulative impacts. This concern is heightened by the socioeconomic vulnerability present within the locality, as financial pressures can influence gambling behaviour and the reasons why some people gamble. Evidence cited in Brent’s JSNA found that 37% of Citizens Advice advisers reported taking calls from people who had turned to gambling in the hope of improving their financial situation, while 19% reported cases where gambling was being used specifically in an attempt to meet essential costs, such as energy bills. GamCare advisers similarly reported experiences of callers receiving Universal Credit who viewed gambling as a potential means of generating additional income to meet basic living costs. Providing further opportunities to gamble may contribute to these existing vulnerabilities.

One of the most devastating ways in which gambling-related harms can manifest is through its impact on a person’s mental health. This is particularly relevant in Brent, where estimated prevalence of common mental health conditions is higher than both the London and national averages (20.7% vs 19.3% vs 16.9% respectively). At the most severe end, gambling-related harm is associated with suicidal thoughts and suicide. Recent UK evidence continues to demonstrate the seriousness of this relationship. Research published in 2026 by the National Centre for Social Research found that 22% of people reporting high levels of gambling problems had attempted suicide during their lifetime, with two-thirds of those individuals linking their most recent attempt to gambling. The report also found that the risk of suicidality is highest among those who reported a combination of gaming and participating in ‘other gambling,’ reinforcing the importance of considering the cumulative availability of different gambling opportunities rather than individual premises types in isolation.

All this highlights the potential severity of gambling-related harm, how hidden and privately experienced these harms can be, and how they may develop without obvious

outward signs. This is particularly relevant in areas where existing vulnerabilities within the population are already elevated. While the applicant does acknowledge many of the potential risks to vulnerable people and proposes a wide range of safeguarding measures in response, many of these measures ultimately depend upon staff being able to recognise indicators of harm, exercise judgement about when intervention is required, or upon customers themselves engaging with the support available.

Summary

This objection is not to gambling in principle, but to the granting of new AGC premises licences in this particular area. The evidence set out above identifies a local environment in which multiple recognised vulnerabilities to gambling-related harm overlap, while the measures proposed by the applicant do not provide sufficient assurance that these risks would be adequately mitigated. We therefore consider that the applications should be refused on the basis that they are not reasonably consistent with the licensing objectives under the Gambling Act 2005.

Yours sincerely,

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