

OBJECTION TO PREMISES LICENCE APPLICATION

To: Licensing Authority, London Borough of Brent

Application Reference: 39394

Applicant: Silvertime Amusements Limited

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

Proposed Use: Expanded Adult Gaming Centre (AGC)

Date: 24 September 2026

We are writing to register our strong objection to Silvertime Amusements Limited's application for an expanded Adult Gaming Centre premises licence spanning 446 High Road and expanding into 8 Park Lane, Wembley. This is an expansion of the existing adult gaming centre at 446 High Road into the former dry cleaners at 8 Park Lane, effectively doubling its footprint and high-frequency electronic gaming capacity.

Our objection is founded on two core licensing objectives set out in Section 1 of the Gambling Act 2005:

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime.

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

Wembley High Road is a busy town-centre shopping corridor which already faces severe socio-economic strain. Granting this licence will significantly scale up high-frequency electronic gaming in an area with acute local vulnerability and documented public safety challenges.

Wembley High Road Serves Residents Across Wembley, Including Wembley Park

It is important to recognise that Wembley High Road is not an isolated shopping parade serving only its immediate vicinity. It functions as a key town-centre corridor for residents across the wider Wembley area, including thousands of residents living in Wembley Park. Whilst Wembley Park has experienced significant redevelopment in recent years, many essential services remain concentrated on Wembley High Road. Residents regularly travel to the High Road to access banking facilities, Post Office services, chemists and a range of transport connections that are not available within Wembley Park itself.

The High Road also provides access to more affordable retailers and everyday shopping options than those typically found within Wembley Park's commercial spaces. Many Wembley Park residents rely on these businesses for day-to-day household purchases and groceries. In addition, numerous children and young people from Wembley Park attend schools and colleges located along or close to Wembley High Road, meaning the route is heavily used by families throughout the school day.

As a result, the impact of an expanded Adult Gaming Centre at this location would not be confined to residents of Wembley Central. The premises sits within a corridor used daily by families, schoolchildren, commuters, shoppers, and vulnerable residents from across Wembley, including Wembley Park. The Sub-Committee should therefore consider the broader community impact on the wider Wembley population that depends upon Wembley High Road as an essential centre for services, education, transport, and affordable retail provision.

The High-Street Nature of an AGC: Why Physical Expansion Matters

This expanded Adult Gaming Centre (AGC) is an automated, self-service electronic gaming venue sited directly on the high street, designed to capture everyday pedestrian footfall. The proliferation and expansion of gambling establishments along Wembley High Street, compounded by the Alcohol and Entertainment Licensing Sub-Committee's recent approval of another adult gaming centre nearby at 574 High Road, are entirely transforming the character of the area from a retail high street into a gambling cluster.

This application seeks to take an existing high-street arcade at 446 High Road and absorb the adjacent retail unit at 8 Park Lane, materially enlarging the overall floorplate. Because statutory regulations permit up to 20% of the total machines in an AGC to be higher-stake Category B3 machines (with maximum stakes of £2 and jackpots up to £500), doubling the physical floor space allows the operator to significantly increase the overall volume of high-loss electronic terminals on site.

Placing a significantly expanded footprint of high-frequency gaming machines directly onto this busy town-centre corridor increases incidental exposure not only for local shoppers, but also for the many families, schoolchildren, commuters, and Wembley Park residents who rely on Wembley High Road for essential services, education, transport connections, banking facilities, postal services, chemists and affordable day-to-day shopping. The harms associated with this expansion would therefore be felt across a far wider community than the immediate vicinity of the premises.

The recent "gambling harms emergency" declared by Brent Council, a motion brought forward by the Brent Labour group and agreed unanimously across the council, recognises the acute public health impact, community safety risks, and rising inequality driven by high-street gambling saturation.

The Council Has the Power to Put Communities First: The Sheffield Decision

Licensing committees are frequently told by operators that national legislation obliges them to grant licences unless statutory authorities raise objections. This is incorrect.

In the 2025 Sheffield Magistrates' Court case (*Royal Amusements v Sheffield City Council*), District Judge Spruce firmly upheld a licensing authority's decision to refuse an AGC licence in a sensitive town-centre corridor. The judgment affirmed three vital principles:

Councils are the guardians of local harm: Local licensing authorities are statutorily responsible for safeguarding their communities from localized cumulative impact.

"Aim to permit" is not a blank cheque: The Section 153 presumption does not compel a council to grant a licence where doing so would clash with local risk assessments, codes of practice, or the licensing objectives.

Interior conditions cannot remedy exterior community harms: DJ Spruce held that standard venue conditions, such as CCTV, alarms, or staff training, cannot regulate or cure the invisible, far-reaching gambling harms that spill out beyond the venue's threshold into homes and streets.

Brent Council possesses clear statutory discretion to evaluate the real conditions of Wembley High Road and refuse this application.

1. Downplaying Crime in an Incident Hotspot

The applicant's Local Area Risk Assessment (LARA) fails to engage with the severe reality of crime along this corridor:

Concealing Official Crime Deprivation: Official Index of Multiple Deprivation (IMD) metrics show that the local LSOA (Brent 020G) is in the worst 8% of neighbourhoods nationally for crime (more deprived than 92% of English neighbourhoods) and the worst 4% across all of Brent. The applicant's narrative omits this acute ranking entirely.

Minimising Serious Street Violence: The applicant claims local crime "mainly consists of shoplifting and theft" and reflects normal high-street shopping. This brushes aside the severe violent incidents Wembley High Road has experienced in recent years, including multiple stabbings, armed police pursuits, and weapon recoveries directly along the parade.

Dismissing the Criminogenic Link: The LARA asserts that "none of these crimes are particularly linked with gambling premises". This contradicts published findings from the Howard League for Penal Reform's Commission on Crime and Problem Gambling, which document that gambling addiction directly drives acquisitive offences (theft, robbery, fraud) to fund escalating losses.

Superficial Interior Measures: Internal panic alarms and CCTV cannot mitigate street-level congregation, anti-social behaviour, or the localized crime risks associated with an expanded venue.

2. A Flawed, Outdated, and Slipshod Assessment

The application documentation contains procedural defects demonstrating a lack of genuine local engagement:

Unfinished Template Text: In two separate places (pages 6 and 19), the LARA states: "Third party testing by (Check Policy) on age restricted sales systems takes place...". Submitting unedited boilerplate text demonstrates that this risk assessment was generated from a corporate template rather than a diligent, site-specific investigation.

Reliance on 11-Year-Old Maps: Appendices 1 and 2 rely on 2015 Index of Multiple Deprivation maps rather than current data, contrary to the Gambling Commission's Social Responsibility Code requiring operators to assess present localized risks.

Selective Incomes vs. Real Deprivation: Citing a commercial property website (Crystal Roof) to claim average incomes are £54,200 obscures the community's structural vulnerability. Government statistics confirm that Brent 020G ranks in the worst 24% nationally for Child Income Deprivation (IDACI) and the worst 21% nationally for Older People Income Deprivation (IDAOPI).

3. Increasing Exposure to Children and Vulnerable Residents

Substantially enlarging this facility multiplies harm in an already over-saturated area:

Immediate Proximity to Children: The premises sits just 138 feet (42m) from Eliana Bilingual Nursery, 135 feet from London School of Science & Technology, and within 0.2 miles of both Ark Elvin Academy and Park Lane Primary School. Expanding the shopfront and entrance along this route normalises electronic gambling along daily school and nursery corridors.

Predatory Proximity to Emergency Foodbanks: The LARA records that Foodcycle Foodbank at Park Lane Methodist Church is only 0.1 miles away (around 160 metres), with pawnbrokers located within 0.2 miles. Increasing high-frequency gambling capacity next to emergency food support directly endangers residents in severe financial crisis.

Aggressive Gambling Saturation: The applicant claims venues are "well dispersed". In reality, their own Appendix 4 map shows an intense cluster: five gambling premises within 120 metres (Betfred at 40m, Paddy Power at 80m, MERKUR Slots at 90m, and Jennings Bet at 120m). Expanding into an adjoining unit worsens cumulative saturation. In a recent decision, Brent Council's Licensing Sub-Committee granted a new premises licence to 312 Investments Limited to operate an Adult Gaming Centre at 574 High Road in Wembley Central.

Public Health Impact: Brent Council's Joint Strategic Needs Assessment (JSNA) indicates that 6.2% of Brent residents are problem gamblers, more than double the national baseline, costing the borough £14.3

million annually. GambleAware puts the figure at £18 million. Scaling up gambling facilities in this vulnerable neighbourhood compounds this public health harm.

Wembley High Road does not need an expanded electronic gaming centre. The surrounding neighbourhood already faces high levels of violent crime, acute income deprivation, and heavy gambling saturation.

Following the principles affirmed in the Sheffield case, Brent Council is fully empowered to prioritise community safety and welfare over commercial gambling expansion.

We respectfully requests that the Licensing Sub-Committee refuse this application.