

From:

Sent: 29 September 2026 22:13

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

Subject: 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: September 2026

I am writing as a local female resident to register my strong personal objection to Silvertime Amusements Limited's application for an expanded Adult Gaming Centre (AGC) premises licence spanning 446 High Road and expanding into 8 Park Lane, Wembley.

This application seeks to absorb the former dry cleaners at 8 Park Lane into the existing gambling arcade at 446 High Road, effectively doubling its footprint and significantly increasing high-frequency electronic gaming capacity.

My objection is founded squarely on two fundamental licensing objectives under Section 1 of the Gambling Act 2005:

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime.
2. Protecting children and other vulnerable persons from being harmed or exploited by gambling.

As women living in, commuting through, this neighbourhood, our daily reality along Wembley High Road and Park Lane is defined by heightened concerns over street safety, intimidation, and safeguarding. Permitting an expanded gambling arcade directly on this corner will aggravate local crime, create hostile street environments for women and girls, and intensify the daily exposure of vulnerable young children to gambling harms.

The Reality of High Street Expansion: Women's Safety & Crime Hotspots

The applicant's Local Area Risk Assessment (LARA) fundamentally whitewashes the severe street-level crime and disorder that local residents, particularly women, navigate daily along this corridor.

Concealing Severe Local Crime Metrics: Official Index of Multiple Deprivation (IMD) metrics confirm that this specific Lower Super Output Area (Brent 020G) ranks 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 assessment conspicuously omits these alarming figures.

Minimising Serious Street Violence and Intimidation: The applicant trivialises local offending by claiming crime "mainly consists of shoplifting and theft." This dismisses the lived reality of Wembley High Road, which has seen repeated serious violent incidents, weapon recoveries, stabbings, and armed police interventions. For female pedestrians, town-centre Adult Gaming Centres act as persistent magnets for loitering, congregation, street harassment, drug dealing, and anti-social behaviour. Expanding this footprint onto the prominent corner of Park Lane expands an active pocket of street intimidation, making it significantly less safe for women and unaccompanied girls walking home from work, school, or local transport hubs after dark.

The Established Criminogenic Link: The LARA asserts that "none of these crimes are particularly linked with gambling premises." This directly conflicts with findings from the Howard League for Penal Reform's Commission on Crime and Problem Gambling, which establish that escalating gambling losses are a primary driver of acquisitive crime (theft, robbery, fraud) as well as domestic stress and violence. Doubling the terminal capacity directly fuels this cycle in a community already under extreme strain.

Interior Controls Cannot Cure Exterior Intimidation: The applicant relies heavily on internal CCTV, magnetic door locks, and panic buttons. These internal measures offer zero protection to female shoppers, mothers pushing prams, or young people on the public pavement outside who must bypass the loitering and disorder these venues reliably generate.

Protecting Children and Vulnerable Families on Daily Routes

The physical expansion of this venue into 8 Park Lane places an intensified gambling environment directly along essential everyday routes used by young children, school pupils, and mothers.

Direct Proximity to Nurseries and Schools: The premises sits just 138 feet (42m) from Eliana Bilingual Nursery, 135 feet from the London School of Science & Technology, and within 0.2 miles of both Ark Elvin Academy and Park Lane Primary School. Doubling the frontage and gaming floor on this exact corner normalises electronic gambling machines to hundreds of young children walking to and from school and nursery every single day. Children should not have to run a gauntlet of flashing terminals, gambling branding, and associated street-level disorder on their daily educational journeys.

Predatory Impact on Deprived and Vulnerable Families: Government statistics show that Brent 020G ranks in the worst 24% nationally for Child Income Deprivation (IDACI). The applicant's own assessment acknowledges that the Foodcycle Foodbank at Park Lane Methodist Church is only 0.1 miles (160m) away, alongside pawnbrokers within 0.2 miles. Siting an enlarged, automated gambling venue, where up to 20% of machines can be higher-stake Category B3 terminals (£2 stake, £500 jackpot), right beside vital emergency food provision targets families in desperate financial distress, stripping scarce resources directly away from household essentials, food, and children's welfare.

Aggressive Saturation of Wembley Central: The applicant claims venues in the area are "well dispersed." Their own documentation reveals an oppressive cluster of five gambling premises within 120 metres (Betfred at 40m, Paddy Power at 80m, MERKUR Slots at 90m, and Jennings Bet at 120m), compounded by the recent approval at 574 High Road. Siting an enlarged gambling hub here turns a family-serving retail parade into an unbroken gambling strip, eroding family-friendly amenities and community cohesion.

Compounding the Public Health Emergency: Brent Council's Joint Strategic Needs Assessment (JSNA) records that 6.2% of Brent residents are problem gamblers—more than double the national baseline. GambleAware estimates local annual gambling harms at £18 million. Brent Council unanimously declared a "gambling harms emergency" precisely to halt the expansion of predatory venues that entrench child poverty and public health crises.

Procedural Defects in the Application

The documentation submitted by the applicant exhibits a disturbing lack of genuine local engagement:

Unedited Corporate Boilerplate: In two separate sections (pages 6 and 19), the LARA states: "Third party testing by (Check Policy) on age restricted sales systems takes place...". Submitting unpopulated template text indicates that this assessment was a cut-and-paste desktop exercise rather than a diligent, site-specific safety appraisal.

Outdated Deprivation Data: The application relies on 2015 IMD maps (Appendices 1 and 2) rather than current data, in contravention of the Gambling Commission's Social Responsibility Code.

Distorted Income Metrics: Citing a commercial property estimate of £54,200 average household income conceals the deep, documented pocket of acute child and pensioner poverty defining this specific LSOA.

Statutory Powers: The Sheffield Decision

Licensing committees are often told that national legislation creates an unavoidable presumption in favour of granting licences under Section 153. This is not the case.

In the 2025 Sheffield Magistrates' Court appeal (Royal Amusements v Sheffield City Council), District Judge Spruce firmly upheld a local authority's refusal to permit an AGC in a sensitive, deprived town-centre corridor, establishing key legal precedents:

1. Councils are the guardians of local harm: Local licensing authorities bear the statutory duty to protect their local communities from cumulative impact and localised vulnerability.
2. "Aim to permit" is not an unconditional duty: Section 153 does not compel a licensing authority to grant an application that conflicts with local risk assessments, statutory codes, or the core licensing objectives.
3. Internal conditions cannot remedy external community harm: Standard venue conditions (CCTV, staff training, alarms) cannot regulate or mitigate the broader harms, street disorder, and domestic pressures that spill out into the surrounding neighbourhood.

Conclusion

Wembley High Road does not need an expanded electronic gambling arcade. As a female resident, I urge the Sub-Committee to listen to the lived experiences of women and families who rely on these streets. Doubling the size of this venue directly threatens female safety, invites street-level crime, and exposes vulnerable children and struggling families to escalating harm.

Under the powers affirmed in the Sheffield judgment and in alignment with Brent's declared gambling harms emergency, I respectfully request that the Licensing Sub-Committee refuse this application in its entirety.

Many thanks in advance,