

## Minutes

### LICENSING SUB-COMMITTEE

27 October 2025

Meeting held at Committee Room 6 - Civic Centre, High Street,  
Uxbridge UB8 1UW



	<p><b>Committee Members Present:</b> Councillor Darran Davies (Chair) Councillor Kelly Martin Councillor Barry Nelson-West</p> <p><b>Applicant's representatives:</b> Sarah Le Fevre, barrister representing the applicant Felix Faulkner, solicitor representing the applicant Amanda Kiernan, Head of Compliance for the applicant Nigel Davis, Head of Gaming Machines for the applicant Steve Ambrose, Operations Director for the applicant</p> <p><b>Officers Present:</b> Chantelle McLeod, Legal Advisor Lois King, Principal Licensing Officer Ryan Dell, Democratic Services Officer</p>
16.	<p><b>APOLOGIES FOR ABSENCE</b> (<i>Agenda Item 1</i>)</p> <p>None.</p>
17.	<p><b>DECLARATIONS OF INTEREST IN MATTERS COMING BEFORE THIS MEETING</b> (<i>Agenda Item 2</i>)</p> <p>None.</p>
18.	<p><b>TO CONFIRM THAT THE ITEMS OF BUSINESS MARKED PART I WILL BE CONSIDERED IN PUBLIC AND ITEMS MARKED PART II WILL BE CONSIDERED IN PRIVATE</b> (<i>Agenda Item 3</i>)</p> <p>It was confirmed that all items would be heard in Part I.</p>
19.	<p><b>MATTERS THAT HAVE BEEN NOTIFIED IN ADVANCE OR URGENT</b> (<i>Agenda Item 4</i>)</p> <p>None.</p>
20.	<p><b>APPLICATION FOR A NEW BINGO PREMISES LICENCE: 'MERKUR SLOTS', PART GROUND FLOOR, 62 STATION ROAD, HAYES, UB3 4DF</b> (<i>Agenda Item 5</i>)</p> <p>Officers introduced the report. The application was for a new bingo premises licence under Section 159 of the Gambling Act 2005, which had been made on behalf of the applicant, Merkur Slots UK Limited, part ground floor, 62 Station Road, Hayes, UB3 4DF.</p>

The application was received by the Licencing Service on 16 June 2025 and the closing date for representations was 14 July 2025. The application was sent to all responsible authorities and was advertised in accordance with the relevant regulations. No representations had been received from any of the responsible authorities. One representation had been received from an interested party, who was not in attendance today.

Additional information had been received on 14 and 15 October 2025 from the legal representatives for Merkur Slots Limited, which included additional submissions and case statements from the Head of Compliance, Operations Director and Head of Gaming Machines at the company; policies and procedures and additional guidance from the Gambling Commission; and extracts from the relevant legislation. This information had been circulated to the Sub-Committee and was found as an addendum to the report.

The report contained officer observations, highlights from the Code of Practice and Hillingdon Statement of Gambling Policy, and Members were invited to consider the application.

### **APPLICANT**

The applicant's barrister noted that this was an application by Merkur Slots UK Limited for a new bingo premises licence.

The applicant had produced a useful, detailed set of supporting materials.

The business of Merkur Slots was the provision of safe and pleasant gaming environments. It was a business in which Merkur Slots were very highly experienced. It ran these sorts of venues very successfully across the country. It was operating in a highly regulated environment and had done so successfully across over 230 premises.

The case officer was thanked for setting out the relevant framework.

The supporting bundle contained concrete evidence of the way in which Merkur Slots went about their business; met and promoted the gambling licencing objectives; how it went about compliance with the regulatory regime; and how it met the specific expectations set out in the Hillingdon policy.

The premises would be equipped fully with high-definition CCTV; age verification would be ensured; and vulnerable people would be protected, and all of that both in policy and processes.

This was an applicant that had never been refused a licence, and none of its trading licences had ever been subject to the review process. This was a responsible, trustworthy operator capable of operating in a vast range of localities.

A local area risk assessment had been completed, which had included active consultation with the responsible authorities, including the police authority. The applicant knew its responsibilities and aimed to positively assist the local area. It was noted that a fire risk assessment was not the purpose of the local area risk assessment and had been done separately.

The police had not brought any issues to the attention of the applicant. This was an applicant which was justifiably proud of its excellent record.

Customer numbers were very low, typically single digits at any one time. It was the applicant's experience that they did not cause concern for residents or responsible authorities when up and running. CCTV cameras were a good deterrent.

High Street bingo premises in general and Merkur Slots in particular were completely different from other licenced premises and other gambling licencing premises in terms of their impact, and the responsible authorities had no concerns. A third party had been instructed to carry out overt and covert inspections, with over 70 conducted so far across their premises.

The exterior appearance of the premises was clean, smart and well maintained, which was important for the presentation of the high street. This also minimised the prospect of unwelcome customer attendance.

Staff were expected to interact with customers from the point of entry. The licencing objective of protecting vulnerable people from being harmed or exploited referred to those whose ability to control their own behaviour was limited, whether because they were experiencing gambling urges, mental health challenges, or under the influence of drink or drugs. The applicant had provided their safer gambling policy.

The legal framework highlighted the aim to permit applications.

It was noted that objections must be relevant. For example, a general dislike for gambling was not a relevant objection. Evidence was required to demonstrate the effect the grant of the licence would have on the licencing objectives. The applicant had a proven track record of successful operation of gambling premises, and it was noted that conditions could be added if required.

One representation had been received, though it contained nothing that was relevant to the determination of the application. The applicant aimed to be a supportive, sensitive commercial neighbour. The small customer numbers would mean little, if any, impact on parking and the planning authority had not objected. The need for a gambling premises was not relevant. A negative perception of the customers who may engage in gambling was also not relevant. It was suggested that there was no basis to refuse this application.

Members thanked the applicant and licensing officer for their reports.

Members asked if any concerns had been raised about the proximity to a local school, and children passing by to nearby bus stops. Members also asked if there were issues of children trying to access the venue. The applicant's representatives noted that it was important to be aware of the proximity of schools, school ages and travel routes. In practise, the venue did not attract children and children were not allowed on the premises. There was a Think 25 policy in place and staff would turn away any children who did try to enter.

Members asked about the number of customers. The applicant's representative noted that it was usually single digits, occasionally 10-11 customers. There were no issues with dispersal.

Members asked if there was a policy for loitering within the premises. It was noted that while there was not a specific policy, this was included within other policies. There was a no play, no stay policy.

Members asked how many of the applicant's premises operated under the bingo licence and not the machine gaming licence. It was noted that bingo had moved on from large halls which were no longer commercially viable. Most licences were bingo licences.

Members asked about plans for the rest of the building. The applicant would not operate over two floors. Part of the building had gone back to the landlord.

Members asked about door supervisors, and if there were any plans for these. These would be employed on a risk assessed basis.

### **INTERESTED PARTIES**

The Interested Party was not in attendance.

### **DISCUSSION**

Members asked about the average spend in the venue, and if there was a limit in relation to protecting vulnerable people. The average spend varied but it was important that staff engaged with customers. If a customer was in the venue for a long period of time, there would be a lot of interaction with staff. This included looking for signs of people who were losing a degree of control.

Age verification tests ('test purchases') were carried out by a third party, at least three times per year. Any issues had to be investigated within 48 hours including reviewing CCTV. The third party operated on the basis of Think 25.

Members asked if the gaming machines had facial recognition, or if it was for staff to challenge this. It was confirmed that face to face challenge was used.

There was an incident log for any issues, which staff were trained to use. Most customers were known as they became regular customers. There were low levels of ASB, and training for staff was comprehensive.

Members asked about staffing levels. There was a policy of no lone working after 10pm. In practise, due to shift changes, there were generally 1.6 to 1.75 staff per hour. There were periods of lone working, but these were minimised.

The staff guard system consisted of each staff member carrying a fob that connected to an external resource who had access to CCTV, and there was also live audiovisual recording.

### **CLOSING REMARKS**

There were no closing remarks from the Licensing Officer.

The applicant's representative invited the Sub-Committee to grant the application.

### **COMMITTEE DELIBERATION**

All parties were asked to leave the room while the Sub-Committee considered its decision.

All parties were invited back to the meeting for the Chair to announce the decision of the Sub-Committee.

## **CONSIDERATIONS**

The Sub-Committee considered all relevant evidence made available to it and in doing so took the following into account:

- Licensing Objectives, Gambling Act 2005
- The guidance issued by the Gambling Commission
- Hillingdon's Gambling Licensing Policy

## **THE DECISION**

The decision of the Sub-Committee is to **GRANT** the application for a new bingo premises licence.

Having considered all the evidence, the Sub-Committee concluded that the application should be granted as set out in their application.

### **Reasons for Decision:**

The Sub-Committee considered that there have been no objections received from any responsible authorities, indicating no concerns regarding compliance with the licensing objectives.

The Sub-Committee were impressed by the comprehensive representations from the applicant demonstrating a clear and detailed business model with a thorough risk assessment.

The applicant provided evidence of relevant experience and a proven track record in operating similar premises. The Sub-Committee were satisfied that the applicant outlined the robust safety measures in place including high-definition CCTV coverage and the provision of a clear vulnerability policy. The sub-committee were happy to hear that the applicant appeared to have effective age verification procedures in place conducted by trained staff rather than relying solely on AI systems.

Having carefully considered the concerns raised by an interested party, which included potential increase in parking demand, gambling activities across two floors and the possibility of children attending the venue. The Sub-Committee found that there was no substantive evidence to support these concerns. In evidence, the applicant confirmed that the operation of their business would take place solely on the ground floor and the anticipated number of patrons (under 10 at any given time) is unlikely to cause a nuisance or impact local parking.

The Sub-Committee also considered that the premises will operate a Challenge 25 age verification system, and access policies are in place to prevent underage entry.

Overall, the Sub-Committee were satisfied that the applicant had implemented effective policies and procedures to mitigate potential risks and uphold the licensing objectives therefore, have resolved that the grant of the licence is appropriate and proportionate.

## **Appeal**

	<p>The relevant applicant for the new Bingo Premises Licence may appeal against the Council's decision to the Justices Clerk at the Uxbridge Magistrates Court. Such an appeal may be brought within 21 days of receipt of this Notice of Decision.</p> <p>No decision made by the Council will have effect during the time period within which an appeal may be brought and until such time that any appeal has been determined or abandoned.</p> <p>The Sub-Committee advises as a comfort to residents and a warning to the licensee that the licence may be reviewed under the Bingo Premises Licence should the premises become managed in a manner which does not uphold the licensing objectives</p> <p>You will be deemed to have received this decision letter, two days after the date on the accompanying letter, which will be posted by 1st class mail.</p>
	<p>The meeting, which commenced at 10.00 am, closed at 11.35 am.</p>

These are the minutes of the above meeting. For more information on any of the resolutions please contact Democratic Services at [democratic@hillingdon.gov.uk](mailto:democratic@hillingdon.gov.uk). Circulation of these minutes is to Councillors, Officers, the Press and Members of the Public.

**The public part of this meeting was filmed live on the Council's YouTube Channel to increase transparency in decision-making, however these minutes remain the official and definitive record of proceedings.**