

## 7. CRIME AND DISORDER CONCLUSION

1. I have considered the following when coming to my conclusions on crime and disorder.
  - There are no crime (CRIS) reports produced by police, I would expect such records to be produced if allegations of crime at the premises were made. If any records exist details should be made available to enable the premises to address any issues raised in them.
  - During my three nights of observations, I did not observe any crime or disorder at the premises, it was well run and orderly.
  - I have searched the Police.UK website and been unable to find a hotspot of crime at or near the premises. While this system has limitations this is another indication that there has been little, if any, crime or disorder at, or near to, the premises.
  - The Edgware Road in the vicinity of Merkur Slots is not a policing priority location and slot/bingo/gaming premises are not a priority activity for policing in Marylebone. See <https://www.police.uk/pu/your-area/metropolitan-police-service/marylebone/?yourlocalpolicingteam=policing-priorities>
  - The premises' own log of incidents from the LARA is referred to as evidence of crime and disorder, I have dealt with this in detail below and do not consider that this provides evidence of crime and disorder at the premises.
2. Taking all of this into consideration I conclude that there is no evidence available that the premises generates, or is associated with, crime and disorder. It is, of course, true that any area or premises where people come together is going to occasionally have incidents that have to be managed, sometimes even with the assistance of police.
3. It is how it deals with these incidents that is crucial and the evidence to which I refer below shows that Merkur Slots deals effectively with them and keeps comprehensive records of such matters. Taking account of all the evidence available my conclusion is that permitting this application will not lead to an increase in crime and disorder at the premises or in the vicinity.

## 8. PROTECTION OF CHILDREN AND VULNERABLE PEOPLE

1. PC Stewart also states that extending the hours at Merkur Slots will undermine the licensing objective of protecting children and other vulnerable persons from being harmed or exploited by gambling. Again I can find no evidence to support this opinion. Children are not permitted into the premises and everyone who appears under 25 is challenged and has to produce ID. I observed this taking place during my observations.
2. As I observed during my observations Merkur Slots takes a responsible approach to supporting the gambling objectives. The premises are well staffed and employ an SIA registered door supervisor at all times. They greet and assess everyone who enters the premises, implementing Challenge 25 to ensure that they are over 18 and ensuring they are not vulnerable through drink or drugs and not excluded from entering the premises.
3. In his Paragraph 6, PC Stewart states that 'An extension in operating hours *can only* (my emphasis) lead to an increase in crime and ASB, particularly given that anyone looking to gamble between 02.00 and 06.00 in this area "*is more likely to be vulnerable than not*" (again my emphasis). I do not know what this assumption is based upon. There is no evidence produced to support that and it is merely speculation. It is not borne out by my own observations of the late night operation of premises in the near vicinity.
4. The area is well known for its night-time economy and widely advertised as a late, and all-night, destination. It is visited by, and home to, individuals and communities who often eat and socialise at times that some in the UK may consider very late. This does not make them vulnerable. It is also clear, supported by my observations, that some of those using the area after 02.00 hours are workers such as waiters relaxing after finishing a shift at work, at whatever time that may be.
5. As a police officer/shift worker himself PC Stewart must know that some shift workers, like any other workers, may seek to relax after work for an hour or two, whether that is after finishing work in an office at 6pm or in a restaurant at 2am. Finishing a late shift and wanting to relax in a comfortable environment for an hour or two does not make a person more vulnerable. There are operational policies and procedures in place to protect the vulnerable, whatever time of day they choose to go out.

## 9. PREMISES INCIDENT BOOK

8. The responsible approach of the premises is further evidenced in the high quality of the 'incident book' that the premises maintains, and this is referred to by PC Stewart in his statement. An incident book is used to highlight a broad range of 'incidents' that take place at the premises to inform management and staff at the premises what is taking place to ensure effective day to day management and also to record incidents that may be of interest to police and other authorities.
9. PC Stewart concludes that because there are 77 entries in the incident book over a period of 20 months from January 2022 to August 2023, that "It is quite clear that the customers of this premises do in fact cause crime and ASB".
10. This is not correct. It is necessary to consider the type of incident recorded, action taken and outcome in order to come to any conclusion about whether or not crime and disorder is caused. For example:
  - Sixteen (16) of the recorded incidents relate to individuals who are barred from the premises. The fact that these records have been made when these individuals have attempted to enter indicates that the status of the individuals was known or successfully assessed and the individuals were, correctly, prevented from using the premises or gaming. Far from reflecting negatively on the premises these records show that it is being run responsibly and in accordance with the Act, protecting those individuals and the premises. The premises should be commended for this, not criticised.
  - Forty-five (45) of the incidents relate to individuals who behaved in an aggressive manner at the premises. This would, I am sure, have resulted in them being removed from the premises and again is a measure of good management. As police only appear to have been called to the premises on six occasions in total it indicates that the premises dealt with incidents alone and effectively on at least Thirty-Nine (39) occasions.
  - Thirteen (13) incidents relate to incidents outside the premises, no reference is made to what these incidents are or if they involve customers from the premises. Without further investigation there is no evidence that they reflect negatively on the premises.
  - It appears that of three (3) incidents relate to alcohol. Again no explanation is given as to why this is considered to reflect negatively on the premises. For example, if three people attempted to bring alcohol into the premises and were prevented from doing so this is an

example of best practice and indicates the premises correctly, and effectively, dealt with the matter.

- Only six (6) incidents over the 20-month period required police 'attention', it is not clear if that means police attendance, or they were simply brought to police attention. In either case that is fewer than 1 incident every 3 months, a low number for a busy premises in a high street location.
- There are no details of any action taken by police on any of these occasions. For example: Did the incident occur in the premises or outside? Were customers involved? Did they result in police attendance? Were any Crimes committed or reported? If so what was the outcome?
- Before using this as evidence that the premises causes crime and disorder, and in particular causes enough to object to the application to extend the hours, some evidence is required, not just simple numbers from an incident book.

## **10. OVERALL CONCLUSION**

1. Having conducted observations at Merkur Slots and at gambling premises nearby, after carefully considering the evidence produced by the police in their representation and the incidents at Merkur slots, I am able to say that the premises currently supports the Licensing Objectives to a good standard and that it will continue to do so if this application to vary the licence is permitted.
2. I understand that under the Gambling Act, the question is whether the extension of hours would be reasonably consistent with the licensing objectives. From my observations, my conclusion is that it would.



**COMPLETE  
LICENSING**

# **MERKUR SLOTS**

**Consultants  
Supplemental Report**

1. Poppleston Allen Solicitors have instructed me to conduct additional observations at, and in the vicinity of, Merkur Slots, 182-184 Edgeware Road, London, W2 over two nights between 23.30 hours on Friday 22<sup>nd</sup> March 2024 and 03.30 hours on Saturday 23<sup>rd</sup> March 2024 and between 23.30 hours on Saturday 23<sup>rd</sup> March 2024 and 03.30 hours on Sunday 24<sup>th</sup> March 2024. I previously conducted observations on the nights of Thursday 19<sup>th</sup> October 2023, Friday 20<sup>th</sup> October 2023 and Saturday 21<sup>st</sup> October 2023.
2. The observations are all in connection with the application to remove the Conditions that limit the hours of use for Bingo and Gaming machines and the operational hours and to permit the premises to be used for the provision of facilities for the playing of Bingo and other gaming machine use from Monday to Sunday 07.00 hours to 06.00 hours.
3. These additional observations follow the extension to the operating hours of McDonalds restaurant next door and are in order to establish if this has any impact on the operation of Merkur slots or the application to extend the hours. I refer the Sub-committee to my report dated 26<sup>th</sup> October 2023 for full details of my previous observations and a summary of my expertise.
4. During these observations, the weather was cold and dry. The Edgeware Road in the vicinity of Merkur Slots was busy, as it had been previously. On the night of Friday 22<sup>nd</sup> March 2024 it was particularly busy until about 02.00 hours after which time the road quietened down a little, however local shops and some restaurants remained open and busy. On the night of Saturday 23<sup>rd</sup> March 2024 the area was generally a little quieter and after 02.00 hours most of the restaurants were closed, although convenience stores and grocers remained open.
5. On my previous observations I noted that there were a number of homeless people sleeping rough in the vicinity of Barclays bank. During these latest observations I did not see any rough sleepers in the area and was only approached by a beggar on one occasion near to the Grosvenor casino. Overall I did not see any other evidence of anti-social behaviour or vulnerable people in the area.
6. I visited Merkur Slots on both nights and found that it was well run and provided a relaxed atmosphere. The customers were mainly in their 30's and 40's and a mix of males and females. The door to Merkur was kept locked with a door supervisor visible inside. On arriving at the premises the door supervisor opened the door and greeted customers. There were three members of staff inside who also greeted customers and walked around the premises talking to those playing the machines. I also visited the other gaming premises in the vicinity and these operated as previously and were orderly and well managed.
7. McDonalds next door to Merkur Slots remained open until about 03.30 hours on the Friday night and 02.30 hours on the Saturday night. It was busy both nights and although I was informed that only



take-away was available when I entered, some customers did sit inside and consume food. There was a door supervisor present and the atmosphere was orderly. Most of the customers purchased take-away food and there were also a substantial number of delivery riders collecting food.

8. The customers in McDonalds were generally a little younger than those in Merkur Slots and were mainly in pairs or groups of friends. They appeared to be mainly locals on their way home from a night out and some appeared to be local workers collecting food after, or during, work. Some made their way away on foot towards the residential areas nearby while others had vehicles or accessed night buses that run past the premises. I did not see anyone go from McDonalds to Merkur Slots, or vice-versa, on either night that I conducted observations.
9. In conclusion I can state that from my observations the later operating hours at McDonalds had no impact on the operation of Merkur Slots and Merkur Slots had no impact on the vicinity and would not do so if the application to extend the hours is permitted.







## **Full Observation Report**

**Stuart Jenkins – Licensing Consultant**

**Leveche Associates Limited**

### **Merkur Slots**

**182-184 Edgware Road London W2 2DS**

#### **Executive Summary**

1. Observations were conducted on Merkur Slots premises at 182-184 Edgware Road London W2 2DS and the surrounding area between 21:00 hours on Thursday 1<sup>st</sup> September 2022 and 06:15 hours on Friday 2<sup>nd</sup> September 2022, then again between 22:50 hours and 23:35 hours on Thursday 15<sup>th</sup> September 2022.
2. Two covert visits were made to the site and the surrounding area. The observations showed the premises are situated on a busy high street within a parade of shops on the A5 Edgware Road. The visits showed the premises to be well run with no issues on each occasion.
3. There are two other operators in the area with a similar business model to Merkur Slots which are Little Vic Casino 156 – 158 Edgware Road W2 2DS and Reel Time 212 Edgware Road W2 1DH which are advertised as being open 24-hours a day. From the observations and my visits to the area, it is clear that Merkur Slots operating 24-hours a day would not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

#### **Introduction**

4. I have been instructed to conduct independent observations on the Merkur Slots premises at 182-184 Edgware Road London W2 2DS and the surrounding areas.

5. These premises are licenced under the Gaming Act 2005 and are open Sunday to Thursday 07:00 to 01:00 hours and Friday and Saturday 07:00 hours to 02:00 hours.
6. The premises come under the jurisdiction of Westminster City Council.

### **Personal – Stuart Jenkins**

7. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
8. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
9. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
10. I was a Home Office qualified Crime Prevention Design Advisor.
11. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
12. I am the holder of a Personal Licence under the Licensing Act 2003.

### **Observations**

13. I carried out my observations of Merkur Slots premises at 182-184 Edgware Road and the surrounding area between 21:00 hours on Thursday 1<sup>st</sup> September 2022 and 06:15 hours on Friday 2<sup>nd</sup> September 2022, and again between 22:50 hours and 23:35 hours on Thursday 15<sup>th</sup> September 2022.
14. The area felt safe with members of the public going about their business, working, shopping, and socialising.
15. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.

16. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.
17. The area of observations is densely populated with many retail premises, licensed bars, and restaurants. Edgware Road is well served by public transport with regular bus routes, taxis, and trains. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. There are London Underground Stations located at Edgware Road to the north of the premises and Marble Arch to the south. These transport mediums allow the public to arrive and leave the area safely and quickly.
18. The area has a diverse community living together in a mixture of privately owned and rental accommodation. The area also has several hotels and bed and breakfast establishments.
19. The premises is situated on the A5 a busy road running North to South. The southern end finishes at one of London's iconic tourist venues, Marble Arch and Hyde Park with the exclusive premises of Park Lane close by. To the north is the Marylebone Flyover which connects to the A40 a main arterial route into London. The road has two-way vehicular traffic passing the venue.
20. Running off Edgware Road, east to west are numerous residential hotel and commercial premises. On either side of Edgware Road there are many retail outlets including independent shop premises, licensed premises, gaming premises, betting shops, restaurants, estate agents, supermarkets, mini-supermarkets, hairdressers, barber shops, chemists and fast-food premises.
21. Immediately north of the premises is an empty shop then the junction with Crawford Place. Immediately south of the premises is a McDonalds Restaurant and then a large Waitrose Supermarket. Opposite there are a number of small independent shops including a mobile phone sales and service premises (Mr Tech and Linku), a Salon (Baghdad Salon) and a Pharmacy.
22. Pedestrian and vehicular traffic varied during the times of the observations. There was zoned parking in local side roads and additional underground parking for some of the residential apartment premises.
23. The area of observations was from Chapel Street in the north and George Street in the south.
24. There are seven other gambling premises in the Edgware Road W2 area of observations. The four bookmaker premises were all closed by 22:00 hours, the other gaming premises were open 24-hours:
  - i. Coral Bookmakers 214 Edgware Road W2 1DH – Image A16
  - ii. Ladbrokes Bookmakers 113-115 Edgware Road W2 2HX – Image A18
  - iii. Paddy Power Bookmakers 242 Edgware Road W2 1DS – Image A15
  - iv. William Hill Bookmakers 95 Edgware Road W2 2HX – Image A19
  - v. Little Vic Casino 156 – 158 Edgware Road W2 2DS – Image A10

- vi. Reel Time 212 Edgware Road W2 1DH – Image A16
- vii. The Victoria - Grosvenor Casino 150-162 Edgware Road W2 2DS – Image A11

25. These premises can be divided into three main types:

- i. Casino premises that serve alcohol.
- ii. Betting premises not licensed to serve alcohol.
- iii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.

26. There are two gaming premises that have a similar business model to Merkur Slots – Little Vic Casino 156-158 Edgware Road and Reel Time 212 Edgware Road which are both able to open 24-hours a day 7-days a week.

27. Throughout my observations in and around Edgware Road I saw no street drinkers, drug dealing, anti-social behaviour or other criminal activity around the premises or the area. There was begging taking place and homeless sleeping in doorways however this was well away from Merkur Slots and not linked to the premises in anyway – Image A8, A9.

28. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendices A and B.

## **Covert Observations**

### **Deployment One**

29. I conducted my covert observations from 21:00 hours on Thursday 1<sup>st</sup> September 2022 to 06:15 hours on Friday 2<sup>nd</sup> September 2022.

30. At 21:00 hours I arrived in the area of the Merkur Slots premises 182-184 Edgware Road W2 2DS and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall – Image A1.

31. Pedestrian and vehicular traffic passing the premises was constant throughout my observations but varied dependent on the time of night. Most of the shops had closed when I arrived. The bookmakers were still open but soon closed without any issues – Image A2, A3, A4, A5, A6.

32. At 21:28 hours I saw a female engaged in begging outside Lloyds Bank Edgware Road with a homeless person sleeping nearby – Image A8.

33. At 21:30 hours I saw a homeless male and female couple asleep outside Barclays Bank Edgware Road – Image A9.

34. Between 22:00 hours and 01:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting the shops, restaurants and late-night

takeaway shops. During this time there were no groups of youths hanging around the premises or in the nearby streets. Pedestrians and vehicles made their way along Edgware Road with purpose – Images A21, A22, A23, A24.

35. Between 00:11 hours and – 00:21 hours I conducted a covert visit to the Merkur Slots Edgware Road – Images A25, A26.
36. The front display of the premises was clean, well maintained and looked professional. The signage was clear and bright.
37. At 00:11 hours I went to the entrance door which was closed. I saw that entry was controlled by using a bell security entry system. On the glass of the door, I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in use.
38. I pushed the door and entered. On entry I saw to the right was a display board with the rules, policies and licences on show for customers and the authorities.
39. On entering this main area, the room opened into a large deep room. I saw it was on one level which was carpeted and there were gaming machines of various types throughout the premises.
40. About half way down on the left I saw a reception area where refreshments were also prepared. At the reception desk I saw two male members of staff dressed in smart corporate clothing.
41. One of the males approached and informed me that the premises was due to close in about 10 minutes. I stated I thought it closed at 1am and he stated it did, but they were closing early to allow staff to thoroughly clean the gaming machines and room. I saw that he had an SIA door supervisor badge clearly displayed. The other member of staff then spoke to me confirming I only had 10 minutes to use the machines until the premises closed, I replied that would be fine.
42. I saw there was one other customer in the premises. He was male about 27 years of age and casually dressed. No other customers came into the venue during my visit.
43. I found a gaming machine to play and sat down. I asked the second male if there were drinks available. He stated there were only soft drinks available as they were about to close. I declined the offer and carried on playing the machine.
44. There was a facility to prepare hot and soft drinks at the reception desk area which was clean and tidy.
45. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.

46. After 10 minutes in the premises, I was informed by staff that they were now closed, and I needed to leave. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 00:21 hours – Image A26.
47. At 01:00 hours Merkur Slots Edgware Road formally closed without any issues or incidents.
48. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Images A27, A28, A29, A30, A31, A32, A33, A34, A35, A36, A37, A38, A39, A40, A41.
49. I remained in the area until 06:15 hours when I concluded my observations.

## **Deployment Two**

50. I conducted my covert observations from between 22:50 hours to 23:35 hours on Thursday 15<sup>th</sup> September 2022.
51. At 22:50 hours I arrived in the area of the Merkur Slots 182-184 Edgware Road W2 2DS and started my observations by monitoring the venue and the immediate area around it – Image B1.
52. Pedestrian and vehicular traffic passing the premises was constant but varied as is typical with Edgware Road 24-hours 7-days a week.
53. Between 22:56 hours and 23:28 hours I conducted a covert visit to the Merkur Slots 182-184 Edgware Road W2 2DS – Image B2.
54. At 22:56 hours I went to the entrance door which was closed. The front of the premises was as I have described previously.
55. I pushed the door and entered the premises. In front of me was the board with the premises policies, rules and licences on display. I passed the policies board and entered the main area which was the same as when I visited previously.
56. I saw there were two male staff on duty who were dressed in smart corporate clothing. One of the males was also wearing an SIA door supervisor badge.
57. The member of staff without the SIA badge approached me, welcomed me to the venue and asked if I needed any help with choosing a gaming machine to play. I stated I was fine and looked around the premises.
58. I saw there were five other customers in the venue at the time of my visit. All five were male aged between 28 years and 55 years and casually dressed.

59. I found a gaming machine beyond the reception desk. The staff left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
60. Whilst I was playing the machine the male member of staff who spoke to me originally asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.
61. After a couple of minutes, the staff member brought over my coffee and stated if I needed any help to ask him or his colleague.
62. The hot and soft drinks were prepared at the reception desk area which was clean and tidy.
63. As before whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.
64. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image B3, B4.
65. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. Prior to me leaving two male customers left and did not return. I left the premises at 23:28 hours – Image B5.
66. Throughout my continuing observations I recorded a further photographic image that demonstrated there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Image B6.
67. I remained in the area until 23:35 hours when I concluded my observations.

## **Summary**

68. I found Merkur Slots in Edgware Road to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming.
69. At the time of my visits to the location, I saw mature females engaged in begging and homeless people sleeping in doorways on Edgware Road. However, this activity took place well away from Merkur Slots and was not linked to the premises in any way.
70. I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing or groups of youths hanging around.

71. People entering these premises were vetted before entering or immediately upon entry to ensure drunken or other vulnerable people didn't gain access to the premises.
72. It is clear the presence of Merkur Slots in Edgware Road does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to.
73. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
  - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
  - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
  - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
74. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
75. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
76. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
77. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. It is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.



78. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**20/09/2022**



## **Appendix A**

Observation Images

1st - 2nd September 2022

### **Merkur Slots**

182-184 Edgware Road

London

W2 2DS

### **Leveche Associates Ltd**

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1HQ

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A1**

21:21hrs

Merkur Slots 182-184 Edgware Road London W2 2DS



**Image A2**

21:21hrs

Edgware Road looking south

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A3**  
21:21hrs  
Edgware Road looking north



**Image A4**  
21:26hrs  
McDonalds 178 - 180 Edgware Road W2 2DS

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A5**

21:26hrs

Waitrose Supermarket  
168 - 176 Edgware Road W2 2DX



**Image A6**

21:27hrs

Edgware Road looking north

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A7**

21:27hrs

Pharmacentre 149 Edgware Road  
(opposite Merkur Slots)



**Image A8**

21:28hrs

Female engaged in begging Edgware Road  
looking north

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A9**

21:30hrs

Rough Sleeper Edgware Road looking north



**Image A10**

21:30hrs

The Little Vic Casino 156 Edgware Road W2 2DS

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A11**

21:31hrs

Victoria Casino 150 -162 Edgware Road W2 2DT



**Image A12**

21:32hrs

Female engaged in begging Edgware Road



**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A13**

21:32hrs

Congestion Charge Restrictions Signage Edgware Road



**Image A14**

21:40hrs

Edgware Road j/w Chapel Street and Praed Street  
looking south

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A15**

21:40hrs

Paddy Power 242 Edgware Road W2 1DS



**Image A16**

21:42hrs

Coral Bookmakers 214 Edgware Road W2 1DH

# Merkur Slots

Merkur Slots 182-184 Edgware Road London W2 2DS

1st - 2nd September 2022



**Image A17**

21:43hrs

Reel Time 212 Edgware Road W2 1DH



**Image A18**

21:47hrs

Ladbrokes Bookmakers  
113 - 115 Edgware Road W2 2HX

# Merkur Slots

Merkur Slots 182-184 Edgware Road London W2 2DS

1st - 2nd September 2022



**Image A19**

21:49hrs

William Hill Bookmakers 95 Edgware Road W2 2HX



**Image A20**

21:50hrs

Edgware Road looking north

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A21**

23:53hrs

Merkur Slots 182 - 184 Edgware Road W2



**Image A22**

23:55hrs

Edgware Road j/w Sussex Gardens looking north

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A23**

23:55hrs

Edgware Road looking south



**Image A24**

23:58hrs

Edgware Road looking north

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A25**

00:10hrs

Merkur Slots 182 - 184 Edgware Road



**Image A26**

00:22hrs

Merkur Slots 182 - 184 Edgware Road

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A27**

02:40hrs

Merkur Slots 182 - 184 Edgware Road



**Image A28**

02:40hrs

Edgware Road looking south



**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A29**

02:40hrs

Edgware Road looking north



**Image A30**

02:41hrs

Al Mustafa Express 135 Edgware Road W2 2HR

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A31**

02:42hrs

Little Vic Casino Edgware Road



**Image A32**

02:42hrs

Edgware Road looking south

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A33**

04:37hrs

Merkur Slots 182 - 184 Edgware Road



**Image A34**

04:37hrs

Edgware Road looking north

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A35**

04:37hrs

Edgware Road looking south



**Image A36**

04:38hrs

Rough Sleepers Edgware Road looking north

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A37**

04:39hrs

The Little Vic Casino Edgware Road



**Image A38**

06:04hrs

Merlur Slots 182 - 184 Edgware Road

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A39**

06:04hrs

McDonalds Edgware Road



**Image A40**

06:05hrs

Edgware Road looking north

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A41**

06:05hrs

Edgware Road looking south



## **Appendix B**

Observation Images  
15th September 2022

### **Mercur Slots**

182 -184 Edgware Road  
London  
W2 2DS

### **Leveche Associates Ltd**

Nightingale House  
46-48 East Street  
Epsom  
Surrey KT17 1HQ



**Merkur Slots**  
182-184 Edgware Road London W2 2DS

15th September 2022



**Image B1**

22:54hrs

Edgware Road looking north



**Image B2**

22:55hrs

Merkur Slots 182 -184 Edgware Road W2 2DS

15th September 2022



**Image B3**

23:22hrs

Toilet Check Sheet  
Merkur Slots 182 - 184 Edgware Road



**Image B4**

23:22hrs

Staying in Control Literature / Gamcare Leaflets  
Toilets Merkur Slots 182-184 Edgware Road

**Merkur Slots**  
182-184 Edgware Road London W2 2DS

15th September 2022



**Image B5**

23:28hrs

Merkur Slots 182 - 184 Edgware Road

**Image B6**

23:28hrs

Edgware Road looking south



## **Full Observation Report**

**Mr Nicholas Mason – Consultant**

**Leveche Associates Limited**

**Merkur Slots**

**19 The Concourse**

**Edmonton Green N9 0TQ**

### **Executive Summary**

1. Observations were conducted on Merkur Slots premises at 19 The Concourse Edmonton Green N9 0TQ and the surrounding area between 20:45hrs on Thursday 22nd September 2022 and 05:45hrs on Friday 23<sup>rd</sup> September 2022. The premises are situated in a pedestrianised area of Edmonton Green.
2. One covert visit was made to the Merkur premises and the surrounding area. Observations showed the premises to be well run and operating correctly with no issues.
3. There are no other gaming premises with a similar business model to Merkur Slots in the immediate area. From the observations, it is clear that Merkur Slots operating 24-hours a day does not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

## **Introduction**

4. We are instructed to conduct independent observations at Merkur Slots premises at 19 The Concourse Edmonton Green Shopping Centre N9 0TQ and the surrounding area.
5. The premises has a 24-hour licence under the Gaming Act 2005 and is open 24-hours a day 7-days a week.
6. The premises come under the jurisdiction of the London Borough of Enfield Council and the Edmonton Green Ward for the Metropolitan Police.

## **Personal Summary – Nicholas Mason**

7. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
8. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for the risk assessment and management of intelligence led operations by covert means, including the disruption of organised crime groups infiltrating the licensing industry.
9. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
10. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into MPS through other UK crime authorities / Police forces.
11. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
12. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
13. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
14. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

## **Observations**

15. Observations were carried out at Merkur Slots premises at 19 The Concourse Edmonton Green Shopping Centre N9 0TQ and the surrounding area on Thursday 22nd September 2022 into the early hours of Friday 23<sup>rd</sup> September 2022.