

**Cricklewood Town Team Response - Application for gambling premises licence - old
Barclays Bank**

1. This objection is entered by The Cricklewood Town Team (“CTT”) in response to an application made on the 14th February 2024 by Golden Slots (Southern) Limited (“Golden Slots”) for a gambling premises licence for an adult gaming centre in the old Barclays Bank at 169-171 Cricklewood Broadway (“the Application”).

Background to CTT

2. The Cricklewood Town Team (CTT) works to improve the environment and build a stronger community alongside residents’ associations, community creative and faith groups, local businesses, statutory partners including the police and Barnet, Brent and Camden councils as well as the voluntary sector. Straddling the junction of three boroughs and three wards CTT works in response to feedback from and surveys of residents, businesses and traders around Cricklewood to create a thriving local economy, increase visitor enjoyment and make a greener cleaner environment and a safe place for all of us – a community where all voices are heard and valued.
3. Since 2010 CTT has staged a wide range of cultural, health, social and business events. For more details see <https://cricklewood.net/>.

Grounds for Objection

4. CTT objects to this application on three grounds (1) that there is a lack of need and that allowing this application would mean the loss of an opportunity for other uses (2) that there is a legitimate and evidence-based concern of crime, disturbances, and

ill effects on the community increasing if this application is allowed (3) that this proposal is inconsistent with Brent's Borough plan 2023-2027.¹

Ground 1 - Lack of need and loss of opportunity for other developments

5. There are significant gambling establishments in Cricklewood already. As Golden Slots note in their risk assessment submitted with their application *"There are 3 betting shops within 100m – William Hill, Paddy Power and Star Sports. There is also a Merkur Bingo at 200 Cricklewood Broadway and Admiral Casino at 160 Cricklewood Broadway."* It does not seem to CTT that there is any benefit to the area having an additional gambling premises in the area. If there is a benefit, this has not been clearly evidenced. CTT takes notice of the over representation of gambling establishments in deprived areas as the author of a 2021 study set out *"The research highlights the clear mismatch between the amenities available in 'left behind' areas, compared with those that are more affluent. Rather than having greater access to the facilities, services and opportunities that help people to improve their lives, those in more deprived communities are disproportionately faced with choices that can often prove harmful."*²

6. CTT are further concerned that Cricklewood's opportunity to grow as a thriving community is being undermined by the granting of applications such as that made by Golden Slots. Cricklewood had local banks in the community which have now nearly all closed. CTT are concerned that Cricklewood's prime high street locations are being granted to establishments which are unlikely to serve the needs of the community and that this is entrenching the lack of valuable amenities in the locality. Putting the point at its lowest, the bingo premises license granted under number 30158, will be lost if this application is granted. CTT considers that bingo at least

¹ See <<https://www.brent.gov.uk/the-council-and-democracy/strategies-priorities-and-policies/brent-borough-plan-2023-2027#boroughplan>> accessed 5th March 2024 at 23:37.

² See <<https://www.localgov.co.uk/Poorest-areas-have-most-gambling-premises-study-finds/52822>> accessed 6th March 2024 at 09:09 and the associated report Jamie Evans & Katie Cross, The Geography of Gambling Premises In Britain (July 2021), Personal Finance Research Centre (PFRC) University of Bristol.

brings communities together to some degree and considers that this fallback position is a material planning consideration.

7. CTT consider that it would be well placed to partner with Brent Borough Council to revitalise the site in question. CTT takes notice of the success in Mill Hill turning former banks into successful restaurants.³ CTT further notes Brent Borough's success in local regeneration in other areas.⁴ CTT believes that local community engagement would allow a better use for the site to be identified but that this first requires that the application be refused.
8. It is because this establishment is not needed and because it would prevent other community enhancing businesses from operating that the application should be refused.

Ground 2 – Concern of crime, disturbances, and ill effects on the community

9. CTT are concerned that the Golden Slots risk assessment understates the issue of crime in the area. In Golden Slots' risk assessment, they maintain that "*Cricklewood is generally considered a safe area with crime rates below the national average. The most serious crime is antisocial behaviour followed by violence and sexual offences; theft and shoplifting are less common.*" Unfortunately, Cricklewood suffers from considerable crime. In January 2024 alone Cricklewood had 188 reported crimes, of which 81 occurred in the immediate vicinity of the proposed location of this establishment (more than two per day) of which 13 were anti-social in nature (more than one every three days) and 21 involved shoplifting crimes (more than one every two days).⁵ The immediate vicinity of the proposed establishment appears to the

³ This is one of them, before – <<https://millhillbroadway.blogspot.com/2020/04/hsbc-bank-restaurant-bar-mill-hill.html>> - and after <<https://bankfoodanddrink.co.uk/>> both websites accessed 5th March 2024 at 23:56.

⁴ See <<https://www.brent.gov.uk/business/regeneration>> accessed 5th March 2024 at 23:58.

⁵ See <<https://www.met.police.uk/area/your-area/met/barnet/cricklewood/about-us/crime-map>> accessed 3rd March 2024 at 19.11.

CTT (and contrary to Golden Slots assessment) to be a hotspot for crime, particularly shoplifting and anti-social behaviour.

10. CTT is concerned that an increase in gambling facilities will increase the number of crimes driven by financial need or frustration following vulnerable individuals making significant losses. In connection with this the CTT is concerned that Golden Slots have self-assessed in their application that the risk is medium in relation to (1) "Failure to deal with customers making complaints about the outcome of gambling" and (2) "Failure to recognise signs associated with problem gambling or substantial changes in gambling style". While it is noted that mitigation features are indicated in the risk assessment CTT is concerned that at least some of these risks are almost certain to arise with a corresponding detrimental impact on the community, particularly given the proposed 24-hour opening times.
11. CTT are further concerned that the prevalence of gambling institutions will undermine the community enhancing work in the vicinity. For example, Ashford Place is a centre helping the homeless and financially vulnerable is less than half a mile from the proposed premises, Barnet Foyer which offers accommodation to vulnerable young people is half a mile away. It is notable that Golden Slots is aware of the harms of problem gambling. It states in its policy that *"It is the Company's policy that no member of staff is permitted to gambling on its Premises This is to protect both the Operator and employees against any issues that can arise from the effect of problem gambling."* Unfortunately, it appears to CTT that a level of problem gambling being exacerbated by this establishment being permitted to operate is inevitable.
12. High crime of a nature likely to be exacerbated by this establishment and the deleterious effects on community groups are both good reasons to refuse this application.

Ground 3 - inconsistency with Brent's Borough plan 2023-2027

13. Brent Borough Plan 2023-2027 states that its third strategic priority is Thriving Communities. Two points are made in this connection:

- a. Desired Outcome 1 is *"Enabling Our Communities"* to do this Brent Borough says it will *"Support the Voluntary and Community Sector with clear communication and forums to provide insight, data and case studies of the lived experiences of residents."* There is no evidence to suggest that the local community lived experience supports the grant of the application. This objection alone is evidence that the local community lived experience militates against the grant of this application.
- b. Desired outcome 2 is *"A Safer Borough"* to do this Brent Borough says that it will *"design out crime and anti-social behaviour"*. Without repeating ground 2 here, it suffices to say that CTT does not consider that the Application is consistent with seeking to design out crime and anti-social behavior because it creates a hotspot of similar establishments that will likely increase undesirable associated behavior.

Conclusion

14. CTT is committed to making Cricklewood a vibrant and pleasant place to live. The application falls short of this goal. It is simply not needed. More concerning, CTT consider that the evidence shows that this development will be harmful to Cricklewood and contrary to Brent Borough's 2023-2027 plan. CTT therefore asks that the application not be granted.

15. CTT hopes that priority is given to proposals that clearly evidence a positive impact upon the community and looks forward to supporting such applications in the future.

Cricklewood Town Team

March 2024