

Monday 23<sup>rd</sup> December, 2024

Application Number: 33757

To whom it may concern,

**Re: Subject: Objection to Merkur Slots Application at 263–265 Neasden Lane**

I am writing on behalf of concerned residents, and as an elected representative of the Neasden community, to formally object to the proposed Merkur Slots development at 263–265 Neasden Lane. This objection seeks to highlight the detrimental impacts of the application in terms of its size, location, impact on vitality and viability, and its contribution to social harm within the community.

**General Overview**

Brent already faces significant challenges related to gambling, as highlighted in a recent needs assessment (2024). **The borough has the second-highest concentration of gambling premises in London, with 81 licensed establishments—making gambling facilities more accessible than supermarkets, banks, or schools.** Brent was also ranked 5<sup>th</sup> among local authorities with the highest number of betting shops per capita. Another exploitative gambling establishment is therefore grossly unwelcome and inappropriate for our community.

Key findings of Brent Council's Joint Strategic Needs Assessment (JSNA) have revealed that:

**Gambling Prevalence:**

- 6.2% of Brent residents are categorised as problem gamblers, over double the national average (2.9%).

**Economic Impact:**

- Gambling-related harm costs Brent an estimated £14.3 million annually.

**Targeting of Deprived Areas by:**

- Operators such as Merkur Slots consistently target deprived areas, including Harlesden, Neasden, and Willesden.

**Addictive Products:**

- Fixed Odds Betting Terminals (FOBTs) and online slots cause over half of all problem gambling cases in the UK, despite being played by only 3% of the population.
- FOBTs have an addiction rate of over 50%. For comparison, heroin has an addiction rate of 20-30%, and tobacco has an addiction rate of 30%.

These findings underscore the need for a reduction in the number of gambling establishments, particularly in areas like Neasden Lane, to mitigate harm and protect vulnerable populations.

## 1. Impact on Vitality and Viability

The proposed Merkur Slots development also poses a significant threat to the vitality and viability of Neasden Lane as a local commercial centre. **There are already 3 betting shops in just 100 metres of Neasden Lane which consistently attract anti-social behaviour.** The introduction of yet another gambling establishment in this prominent location undermines the council's efforts to cultivate a diverse and vibrant local economy.

The National Planning Policy Framework (NPPF) and the London Plan emphasise the importance of maintaining healthy, inclusive, and economically sustainable town centres. Gambling establishments, such as the proposed adult gaming centre, disproportionately affect the balance of commercial activities in retail hubs. Neasden Lane already accommodates several similar establishments, creating an over-concentration that deters other types of businesses from thriving and reduces the area's attractiveness to a wider demographic.

Additionally, the proposed design lacks a vibrant, active frontage that contributes to the pedestrian experience. Instead of fostering engagement and interaction, the development detracts from the sense of community and activity essential for a thriving town centre.

## 2. Concerns Regarding Size and Location

The scale and location of the proposed Merkur Slots venue are inappropriate for the area and conflict with the surrounding land uses. The development raises serious concerns about its impact on nearby residential properties. The continuous nature of the operation is likely to lead to increased noise and anti-social behaviour, particularly during late-night hours when most other businesses are closed. A study by our neighbouring borough, Ealing Council, outlined a profound link between gambling premises and anti-social behaviour.

The Brent Local Plan highlights the importance of protecting residents from excessive noise, antisocial behaviour, and disturbance resulting from commercial activities. This proposal fails to meet those criteria and risks undermining the residential amenity of those living in close proximity. Furthermore, its prominent location on Neasden Lane, a vital artery for the local community, exacerbates its negative impact by prioritising a gambling establishment over more inclusive and beneficial land uses.

## 3. Social Impact and Health Concerns

The Merkur Slots application raises profound concerns regarding its potential to exacerbate social harm within the community. Neasden is already an area facing significant socio-economic challenges, including high levels of deprivation and vulnerability to gambling-related harm. The addition of another gambling establishment will only compound these issues, since these shops fuel a vicious circle of harm, addiction and despair.

The key findings from the Brent gambling needs assessment emphasise that:

- **Financially Vulnerable Populations:** Many individuals gamble out of financial desperation, particularly during the ongoing cost-of-living crisis.
- **Young People and Ethnic Minorities:** Young people (16-24 years) are three times more likely to exhibit problem gambling habits. While ethnic minorities gamble less frequently, they experience disproportionately higher rates of harm.

The NPPF and the London Plan emphasise the importance of creating healthy, inclusive communities that contribute to the well-being of their residents. This proposal directly undermines those principles by targeting a population already disproportionately affected by gambling-related harm. Instead of promoting inclusivity and resilience, the development risks deepening existing inequalities and social challenges.

In summary, the proposed Merkur Slots development at 263–265 Neasden Lane is fundamentally at odds with our aspirations for the local area and the needs of the local community.

We are deeply concerned by its size, location, and the operational nature threaten the quality of life of residents, and the social fabric of the area. The proposal contravenes the objectives of the London Plan, the Brent Local Plan, and the NPPF.

We strongly urge the Licensing Authority to reject this application and prioritise developments that contribute positively to the economic, social, and cultural well-being of Neasden and its residents.

Yours sincerely,

**CLLR LIZ DIXON**

Dollis Hill Ward