

From: Choudry, Councillor Saqlain

Sent: 06 April 2026 22:34

To: Business Licence; Long, Councillor Janice; Miller, Councillor Tom;
towncentreregeneration

Cc: Legister, Linda; Prashar, Anu; Esther, Chan

Subject: Re: New Adult Gaming Centre Application - Willesden Green - 37891

Dear Business License Team,

I write to formally object in the strongest possible terms to the application by Arcadio Casino Limited for a new Adult Gaming Centre premises licence at 1 Walm Lane, NW2 5SN. This objection is made with direct reference to Brent Council's Statement of Principles under the Gambling Act 2005 and on the basis that the application fails to satisfy the licensing objectives, in particular:

- the prevention of crime and disorder;
- the protection of children and vulnerable persons from being harmed or exploited by gambling.

1. Failure to address local risk as required by Brent policy

Brent's Statement of Principles is clear that applicants must demonstrate a thorough understanding of local risks and set out robust, location-specific mitigation measures. This application does not meet that requirement. The operating schedule relies on generic and standardised measures, rather than a detailed local risk assessment reflecting the specific characteristics of Willesden Green. There is no meaningful engagement with:

- the high concentration of existing gambling premises in the immediate vicinity;
- the known levels of deprivation and vulnerability in the area;
- the established issues of crime and anti-social behaviour along Walm Lane and Willesden High Road.

In failing to provide a credible local risk assessment, the applicant has not discharged the burden placed upon it by Brent's policy.

2. Overconcentration and cumulative impact

While Brent does not operate a formal "cumulative impact policy" for gambling, its Statement of Principles makes clear that the Licensing Authority will consider the location of premises and the risks posed by clustering of similar uses.

The area surrounding 1 Walm Lane is already saturated:

- two Adult Gaming Centres within approximately 0.1 miles;

- five betting shops in the immediate vicinity;
- additional high-risk financial uses such as pawn brokers and payday lenders.

Granting a further licence would intensify this clustering to an unreasonable degree. The proximity of three Adult Gaming Centres within a few minutes' walk is not incidental - it materially increases the risk of:

- problem gambling behaviours;
- repeat and prolonged use;
- targeting of vulnerable individuals.

Brent's policy expressly allows the Authority to take account of such location-based risks. In this case, the cumulative impact is both evident and significant.

3. Crime and disorder – policy conflict

Brent's Statement of Principles recognises that certain types of gambling premises, including Adult Gaming Centres, can give rise to heightened risks of crime and disorder, particularly in areas already experiencing such issues.

The evidence in this case is clear:

- Willesden is identified by Brent as an area experiencing medium to high deprivation;
- it is a recognised hotspot for crime and anti-social behaviour; the last 18 months has seen a series of crime and ASB in this particular hotspot, as demonstrated by crime reference numbers and police reports.
- recorded crime has increased by 8.1% as of January 2026, including open substance misuse.

The Social Market Foundation has also highlighted that Adult Gaming Centres are associated with:

- high levels of cash handling;
- risks of money laundering (as recognised by the Gambling Commission);
- local concerns regarding disorder and exploitation.

Brent's policy requires the Licensing Authority to consider whether the grant of a licence would exacerbate existing problems. In this context, it is difficult to see how an additional Adult Gaming Centre could do anything other than worsen them.

4. Protection of children and vulnerable persons

Brent's Statement of Principles places significant emphasis on the protection of children and vulnerable persons, including those:

- experiencing financial hardship;
- with mental health challenges or addiction issues;
- who may be susceptible to exploitation.

The proposed premises is located within close proximity to:

- schools and colleges such as Anson Primary, St Mary's Magdalen, Our Lady of Grace, Gladstone Park Primary
- care and supported accommodation; including vulnerable households and premises
- medical facilities including pharmacies such as Newcare Pharmacy and Willesden Medical Centre
- places of worship including Central Mosque of Brent, St Gabriels Church, Willesden Methodist Church
- a major transport hub at Willesden Green Underground station

It sits on a heavily used pedestrian route, with constant footfall from children and vulnerable individuals including those suffering from substance misuse and addiction.

Brent's policy explicitly recognises that location is a key factor in assessing risk to vulnerable groups. In an area already saturated with gambling opportunities, the addition of another venue will inevitably increase exposure, normalisation, and risk.

Research supports this:

- 44% of young people aged 14–17 report increased interest in gambling where venues are nearby;
- 27% report awareness of underage access to Adult Gaming Centres.

The applicant has failed to demonstrate how these risks will be effectively mitigated in this specific location.

5. Inadequate operating schedule and lack of detail

Brent's Statement of Principles makes clear that the Licensing Authority must be satisfied that appropriate measures are in place to uphold the licensing objectives.

This application falls significantly short:

- No proposed opening hours are stated, preventing proper assessment of impact.
- The measures offered are generic and lack specificity.
- There is no evidence of enhanced safeguards proportionate to the risks of this location.
- The applicant mentions 1 Walm Lane, Wembley: further showing the administrative slips on the application

Furthermore, Arcadio Casino Limited is, according to its filed accounts, a dormant company with no trading history. This raises serious concerns as to whether it has the operational capacity and experience to implement effective controls in practice. It also raises concerns whether the company has the genuine interest of the community at heart and whether it understands the locals needs in the area.

The Authority is entitled to give weight to the credibility and track record of an operator when assessing risk.

6. Policy conclusion

Brent's Statement of Principles is clear that each application must be considered on its merits, but also that the Licensing Authority should take a precautionary and evidence-based approach where risks to the licensing objectives are identified.

In this case:

- there is clear evidence of overconcentration;
- the location presents heightened vulnerability;
- crime and disorder risks are already elevated;
- the applicant has failed to provide adequate, location-specific mitigation.

Taken together, these factors strongly indicate that granting this licence would undermine, rather than promote, the licensing objectives.

Conclusion

For the reasons set out above, and having regard to Brent's Statement of Principles, I respectfully submit that this application should be refused.

Hundreds of residents have also expressed their desire to see a local area that is thriving and deserving of diversity, not of establishments that harm individuals and society. Another adult gaming centre included in Willesden / Brent will do more harm, than good. Enough is enough.

The Licensing Authority can be confident that refusal is both justified and necessary to uphold the licensing objectives and to protect the wellbeing of the local community.

Please could you confirm and acknowledge this objection, and next steps in this process.

Kind regards,

Cllr Saqlain Choudry

Councillor for Willesden Green, Brent
