

From: Krupesh Hirani

Sent: 02 April 2026 17:13

To: Business Licence

Subject: RE: Objection to the Premises Licence Application 37891 – Arcadia Casino Limited, 1 Walm Lane, NW2 5SN

Dear Sir / Madam,

I am writing in my capacity as the London Assembly Member for Brent and Harrow to formally object to the application by Arcadia Casino Limited for a new Adult Gaming Centre (AGC) at 1 Walm Lane.

Beyond my current role, I speak as a former local Councillor for Dudden Hill. I know this specific area intimately, and I am deeply concerned about the negative impact another gambling venue will have on the Willesden Green community. Furthermore, through my work on the **London Assembly's Health Committee**, I have examined the extensive evidence regarding gambling harms as a significant public health issue. Granting this licence would be fundamentally inconsistent with the licensing objectives under the Gambling Act 2005.

1. A Public Health Crisis and Overconcentration

My work at the London Assembly has highlighted that gambling harm is not merely an individual issue but a community-wide health crisis. Brent is already at a breaking point:

- **Saturation:** Brent has one of the highest concentrations of gambling premises in London (81 licensed venues).
- **Disproportionate Risk:** Brent's Joint Strategic Needs Assessment (JSNA) shows that **6.2% of our residents** are gambling at the highest level of risk—more than double the national average of 2.9%.
- **Deprivation:** As I have often argued in the Health Committee, these harms fall hardest on areas facing high deprivation. Adding another AGC to Walm Lane is not "providing choice"; it is predatory clustering in a vulnerable community.

2. Preventing Crime and Disorder

As a former councillor for this area, I am well aware that the High Road and Walm Lane are already hotspots for anti-social behaviour (ASB) and violent crime. The applicant's own assessment acknowledges nearly **10,000 crimes** in the vicinity over the last year.

The proposal for this venue is woefully inadequate to meet the "Crime and Disorder" objective:

- **Vague Operating Hours:** The applicant has failed to specify opening times in the application. It is impossible for the Licensing Authority to assess risk when the hours of operation are unknown.
- **Insufficient Staffing:** A minimum of only two staff members in a high-crime area, surrounded by pubs and pawnbrokers, is a recipe for disorder. High-cash businesses like AGCs require robust, site-specific security, not generic "Challenge 25" policies.

3. Protecting Children and Vulnerable Persons

This is the most critical objective. The Health Committee's research consistently shows that the visibility of gambling venues "normalises" the habit for young people.

- **Proximity to Services:** 1 Walm Lane is 0.2 miles from Willesden Green station and surrounded by schools, colleges, and support services for those struggling with drug and alcohol dependency. We have had a major issue in recent years with people sadly addicted to alcohol and drugs around the tube station area in particular with various additional outreach sessions with drug and alcohol services having to be arranged in the immediate vicinity to support people through their addiction issues. Having this gambling outlet here would prey on these particular individuals vulnerabilities.
- **Economic Vulnerability:** The presence of multiple pawnbrokers (H&T and others) within yards of this site creates a "cycle of harm" where residents in financial distress can easily liquidate assets to gamble.

4. Community Renewal vs. High Street Decline

From my time representing Dudden Hill, I know that residents want a high street that offers genuine community value, diversity, and safety. Research by *More in Common* confirms that most Londoners would rather see an empty shop unit than another gambling den.

- **Saturation of betting shops:** Residents rightly ask why one area needs a dozen betting and gaming shops. This over-saturation brings the area down and acts as a deterrent to more family-friendly, health-conscious businesses that Brent actually needs.

Conclusion

The evidence I have seen at the London Assembly, coupled with my local knowledge of Willesden Green, leads to one conclusion: **this application must be refused**. The applicant has provided poor case that ignores the specific socio-economic challenges of the area. It does not offer sufficient protection for the vulnerable, it fails to address the very real risks of crime and disorder in a hotspot area, and it ignores the public health data that shows Brent is already suffering from an excess of gambling opportunities.

I strongly urge the Licensing Sub-Committee to reject this application and protect the health and well-being of the Willesden Green community.

Best wishes,

Krupesh

Krupesh Hirani AM

London Assembly Member for Brent and Harrow

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