

07-04-2026

I write to object to the application by Arcadia Casino Limited for a new Adult Gaming Centre premises licence at 1 Walm Lane, NW2 5SN on the following grounds: 1. The application is defective in material ways 2. The applicant is not suitable to hold a Gambling Act licence 3. Granting the application would undermine efforts to reduce crime and anti-social behaviour in the area 4. Granting the application would risk causing harm to vulnerable people 5. There is already a concentration of similar gambling shops in the area

The application is defective in material ways On Monday 6 April 2026, the applicant, Arcadia Casino Limited, posted notice of its application and the consultation period at 1 Walm Lane. In addition to that notice wrongly describing the property as being in Wembley, it wrongly notifies residents that the 28-day consultation period comes to an end on 29 April 2026, when the correct deadline would be 4 May 2026. The applicant has therefore misled residents and would deny residents a full chance to be heard on this issue. The application does not state the intended opening hours. So the Licensing Authority is being asked to assess risks about crime and disorder and fair conduct of gambling without a clear statement of the hours during which the premises will operate. The application fails to identify all of the places of worship, schools, hostels, food banks and bus stops close to 1 Walm Lane. For example, it only mentions Christian places of worship, when there are numerous Islamic, Jewish and Buddhist places of worship very close to the premises as well. By failing to identify all the places at which there may be people who may be at risk of gambling harms, the application fails to meet basic standards and shows the applicant does not understand the area in which it proposes to operate. Given the applicant has no trading or operating history (see below), this is a serious concern and a significant defect in the application. For these reasons alone, the application should be rejected.

The applicant is not suitable to hold a Gambling Act licence Arcadia Casino Limited is a company registered at Companies House in 2020 under company number 12551756. It has only ever filed accounts unaudited micro entity accounts as a dormant company. Its accounts (including its most recent accounts, for the period to 30 April 2025) suggest it has never traded, or incurred any expenses or generated any revenues. It also has a history of late filings. With such a history, and as a dormant company, the applicant's assurances and statements in Part 5 of its application and elsewhere as to what it can be trusted to do were it granted a licence to open a new adult gaming centre cannot reasonably be believed. Arcadia Casino Limited has no experience of setting up and running an adult gaming centre. It has no experience of managing the risks of harm inherent in operating a gambling operation in a community. Permitting such an applicant to do so would risk causing significant harm to those living and working in the area. Arcadia Casino Limited not being a suitable applicant means the application should be rejected. Granting the application would undermine efforts to reduce crime

and anti-social behaviour in the area Brent already has too many gambling premises, with the harms falling hardest on areas facing deprivation and vulnerability. Allowing another Adult Gaming Centre to be opened would make the situation worse. It would undermine efforts aimed at the prevention of crime, disorder and anti-social behaviour and it would undermine the protection of children and vulnerable persons from harm. Anti-social behaviour is a major problem in Willesden. As of January 2026, annual recorded crime had gone up by 8.1%, including increasing open substance misuse. Businesses and residents in the area immediately around 1 Walm Lane consistently raise complaints about anti-social behaviour, including at night. The state of affairs has required increased action from the police and the Council, and we do not need new gambling establishments making the risk of disorder and crime even worse. Brent's own licensing evidence identifies the area of Willesden High Road and Walm Lane as an area of medium to high deprivation and a hotspot for crime and anti-social behaviour. The Social Market Foundation's report on Adult Gaming Centres found that AGCs carry specific crime and disorder risks. It notes that AGCs involve high volumes of cash transactions, that the Gambling Commission considers them to present a medium risk of facilitating money laundering, and that Brent residents raised concerns about crime and anti-social behaviour around such premises. Granting the application would risk causing harm to vulnerable people. There are numerous schools, colleges, care homes, homeless hostels, places of worship and medical centres close to 1 Walm Lane, all of which are attended by vulnerable people in the area. It is also a major pedestrian thoroughfare, with hundreds of residents (including many children and vulnerable people) walking past 1 Walm Lane to or from Willesden Green tube station and the various bus stops close by. A report found that 44% of young people aged 14 to 17 agreed that the presence of gambling venues near where they live makes people their age more interested in gambling, while 27% said they knew young people who had visited an Adult Gaming Centre. In an area already saturated with gambling venues and associated uses, the Licensing Authority is entitled to conclude that another Adult Gaming Centre would expose children and vulnerable residents to further harm rather than protect them from it. There is already a concentration of similar gambling shops in the area. Brent has one of the highest numbers of gambling premises in London, with 81 licensed gambling premises. It is also among the boroughs with the highest levels of gambling-related harm. Brent's Joint Strategic Needs Assessment confirms that there are more residents at high and low risk of gambling harms than national averages. There are already numerous gambling sites close to 1 Walm Lane. There are already two Adult Gaming Centres within 0.1 miles, each with around 20 to 30 slot machines. Opening a new Centre would mean there would be three within a few minutes' walk of each other and on a busy pedestrian route. There are also five betting shops on Willesden High Road and Walm Lane, each of which has additional slot machines. There are various pawn shops, loan shops and cash machines very close by, which would enable

vulnerable people to access cash to spend at an adult gaming centre easily. This application should be refused.