


17-04-2026

I write to formally object in the strongest possible terms to the application for an Adult Gaming Centre at 1 Walm Lane, Willesden. Whilst I understand applications are not rejected on moral grounds, at some point, doing the right thing has to be considered, alongside the points set out below. This application fails to meet the licensing objectives under the Gambling Act 2005, in particular: • the prevention of crime and disorder • the protection of children and vulnerable persons Failure to address local risk

The application does not comply with Brent's Statement of Principles, which requires a robust, location-specific risk assessment. Instead, it relies on generic measures and fails to reflect the realities of this area, including: • the high concentration of existing gambling premises • known levels of deprivation and vulnerability • ongoing crime and anti-social behaviour along Walm Lane and the High Road This represents a clear failure to meet policy requirements. Overconcentration and cumulative impact The immediate area is already saturated, including: • multiple betting shops • at least two Adult Gaming Centres within a very short distance • other high-risk uses such as payday lenders and pawn brokers Granting another licence would significantly intensify this clustering, increasing: • problem gambling and addiction • repeat and prolonged use • targeting of vulnerable individuals Brent's policy allows full consideration of these location-based risks, and in this case the cumulative impact is clear and unacceptable.

Non exhaustive list of other local gaming/gambling facilities within close proximity of proposed new site (walking distances to 1 Walm Lane according to Google Maps): ♣ Royal Casino Slots – 9 Walm Lane (a 1 minute walk away according to Google Maps) ♣ Merkur Slots – 51-55 High Street (a 3 minute walk away according to Google Maps) ♣ William Hill, 301 High Road, NW10 2JY (14 minute walk) ♣ William Hill, 163 Cricklewood Broadway, NW2 3HY (18 minute walk) ♣ Ladbrokes, 27 Walm Lane, NW2 5SH (2 minute walk) ♣ Ladbrokes 52 High Road, NW10 2PU (4 minute walk) ♣ Ladbrokes, 271 High Road, NW10 2JY (13 minute walk) ♣ Star Sports, 4-6 Cricklewood lane, NW2 1EX (18 minute walk) ♣ Paddy Power, 41-43 High Road, NW10 2TW (2 minute walk) ♣ Quiksilver Adult Gaming Centre – 164 Cricklewood Broadway, NW2 3ED (18 minute walk) ♣ Admiral Casino/Merkur Bingo, 160-200 Cricklewood Broadway, NW2 3ED (22 minute walk) ♣ Macau Casino Slots, 169-171 Cricklewood Broadway, (17 minute walk) Crime and disorder This area is already a recognised hotspot for crime and anti-social behaviour, with rising crime levels in recent years. Adult Gaming Centres are associated with: • cash-related crime and disorder • risks of money laundering • exploitation of vulnerable individuals Granting a further licence in this location would exacerbate existing problems, directly conflicting with the licensing objective to prevent crime and disorder. Protection of children and vulnerable persons The premises is located in close proximity to: • schools and colleges • supported and vulnerable housing • healthcare services and pharmacies • places of worship • a major transport hub at Willesden Green station This is a high-footfall area used daily by children and vulnerable residents,

including those experiencing financial hardship, addiction, or mental health challenges. In an already saturated area, another gambling venue will increase exposure, normalisation, and risk of harm. The application fails to demonstrate how these risks will be properly mitigated. Inadequate application and operator concerns The application raises serious concerns: • no clear proposed opening hours • generic and insufficient safeguards • lack of detail tailored to this specific location  Conclusion There is clear evidence that: • the area is already overconcentrated • vulnerability and exposure are high • crime and disorder risks are elevated • the application fails to provide adequate mitigation Taken together, granting this licence would undermine, not promote, the licensing objectives. I therefore urge the Licensing Authority to refuse this application. The local community has consistently expressed its desire for a thriving, balanced High Road, not one dominated by harmful gambling establishments. Granting this application would punish the whole community and surrounding areas. It would not encourage new businesses, visitors, or investment and spending in our local economy. Refusal is both justified and necessary to protect the wellbeing of residents.