

28-04-26

To: Brent Council Planning Committee / Licensing Committee Re: Planning Application 37891 – 1 Walm Lane, Willesden Green I object strongly to this application and urge the Council to refuse it. While the site sits in a town centre location, Brent is not required to treat every lawful gambling use as acceptable in every location; the Council must be satisfied that the proposal is reasonably consistent with the Gambling Act licensing objectives and with Brent's own policy to protect residents from harm, crime, and the overconcentration of potentially harmful uses. Crime and disorder The first licensing objective is to prevent gambling from becoming a source of crime and disorder or being associated with crime and disorder. Brent's own policy recognises that the borough has significant local risks, including crime and ASB patterns that must be taken into account in gambling decisions. Willesden Green has recorded high levels of anti-social behaviour, with recent ward-level data showing ASB as the most common offence and violent crime also rising; nearby Cricklewood and Mapesbury have also seen notable hate-crime spikes and community-safety concerns. In that context, another gambling venue is not a neutral addition to the high street: it is a use that can intensify late-night footfall, loitering, street conflict, and pressure on already stretched enforcement resources. The Council is entitled to give real weight to the cumulative impact of gambling premises, not just the isolated effect of one more unit. Brent itself has publicly recognised the scale of gambling harm in the borough, estimating annual costs of £14.3 million, and has warned that clusters of gambling uses can undermine local communities and high streets. That evidence makes refusal more, not less, justifiable where an area is already experiencing crime, disorder, and visible vulnerability. Children and vulnerability The second licensing objective requires special care for children and other vulnerable people. Brent's policy specifically expects attention to local area profile, including where vulnerable groups and children are likely to be affected, and it highlights the need to choose suitable locations for gambling premises. Walm Lane and the wider Willesden Green area are not an abstract commercial zone; they are a mixed community setting with schools, families, commuters, and young people passing through daily, so the practical exposure of vulnerable people must be considered carefully. Where a gambling venue becomes part of the everyday high-street environment, it normalises an activity that Brent has already identified as carrying a disproportionate local harm burden. Saturation and overconcentration This proposal should also be refused because it adds to the overconcentration of potentially harmful uses on and around the Willesden Green/High Road frontage. Brent's planning policy BE5 is expressly concerned with preventing the overconcentration of adult gaming centres, betting shops, pawnbrokers, takeaways, and shisha cafes in town centres. Even where a proposal is described differently by the applicant, the practical effect on the frontage and the surrounding area matters: one more gambling venue reinforces a cluster that the Council is already trying to manage, not expand. This is especially

persuasive in an area where the council has already recorded substantial resident concern and where the local evidence base points to harm, deprivation, and crime sensitivity. Brent's policy is not simply about whether a use is technically lawful; it is about whether the authority should protect the high street from becoming dominated by uses that contribute little to vitality and much to harm. Public health impact Brent has made clear that gambling harm is a public health issue, not just a trading issue. The borough's own evidence indicates a much higher level of problem gambling than the national average, and the financial and social burden falls on residents, families, and local services rather than on the operator. Approving another gambling venue in this location would run directly against the Council's stated ambition for a healthier Brent and a thriving community-centred high street. The applicant may argue that conditions can manage the harm, but conditions cannot cure the basic problem of location where the cumulative and social impact is the issue. A refusal would be a proportionate response where the Council can reasonably conclude that the proposal is inconsistent with the licensing objectives and contrary to the borough's local policy aims.

Conclusion For all these reasons, the application should be refused. The Council has strong grounds to conclude that another gambling venue at 1 Walm Lane would add to crime and disorder risk, worsen overconcentration, increase exposure to vulnerable people, and undermine Brent's wider public health and community-safety objectives. In a borough that has already acknowledged the scale of gambling harm and the need to protect its high streets, approval would be the wrong decision.