

OBJECTION: PREMISES LICENCE APPLICATION

131–135 KILBURN HIGH ROAD (BINGO HALL)

As the five recently elected Green Party Councillors for Kilburn in Brent and Camden, we write to formally object to the application for a new bingo hall premises licence at 131–135 Kilburn High Road.

Our objection is based on the failure of this application to promote the licensing objectives, particularly the protection of children and vulnerable persons, within the context of Kilburn's specific socio-economic challenges.

1. PROTECTION OF CHILDREN AND VULNERABLE PERSONS

Extreme Local Deprivation and Child Poverty: Kilburn is currently at the center of a public health and poverty crisis that makes the introduction of a high-frequency gambling venue inherently hazardous.

National Deprivation Context: Brent is now the **fifth most deprived** local authority in the UK for income deprivation affecting children, with **58.7% of our children** living in income-deprived households. In Camden, 69.4% of children live in income-deprived families in the Kilburn area.

Child Income Deprivation: Brent has the fifth-highest IDACI score in the country, with 58.7% of children living in income-deprived households. In Camden (kilburn), **69.4% of children** live in income-deprived families.

Housing Crisis: Brent ranks number one in England for "*Barriers to Housing and Services*," reflecting extreme overcrowding and homelessness. Brent Council receives over 2,000 new housing applications a year and there are more than 33,000 people already on the waiting list. Each week, an average of 170 households approach the council as homeless or at risk of becoming homeless, and 20 new households enter temporary accommodation.

Proximity to Crisis Services and Food Bank Dependency

The "Proximity of Need" and Gambling Risk We wish to draw the Committee's attention to the high concentration of crisis and food aid services in the immediate vicinity of the proposed venue. 131–135 Kilburn High Road sits in a "*service corridor*" for residents in acute financial distress, located just minutes from:

- **Quex Road Food Bank** (Sacred Heart Church)
- **FoodCycle Kilburn** (St. Laurence's Church)
- **The UCKG HelpCentre** (234 Kilburn High Road)

Any LARA that fails to identify the high footfall of minors or the proximity of crisis services, such as local food banks, is fundamentally flawed.

Inadequate Local Area Risk Assessment (LARA)

We hold grave concerns regarding the adequacy of the applicant's risk assessment as it relies upon out of date 2021 census data and fails to cite Deprivation in Brent data which has confirmed that deprivation and its associated challenges are intensifying in the community.

Evidence of Harm

Recent 2026 data from the **Trussell Trust** and **FoodCycle** indicates that food bank dependency in London remains 45% higher than pre-pandemic levels, with 72% of users unable to cover essential living costs.

Research published in early 2026 (Downs et al., [Gambling-Harm in a Community Foodbank Setting: Exploring the Feasibility and Utility of a Brief Non-Clinical Screening Approach](#)) identifies a significant prevalence of gambling-related harm among food bank users, with those living within 2km of a gambling establishment being significantly more likely to bet more than they can afford.

By placing a gambling venue in a location where the most financially vulnerable residents congregate to access emergency food aid, the applicant is creating a *"high-risk intersection."* For a resident struggling to afford their next meal, the presence of high-stakes gaming machines acts not as a leisure opportunity, but as a predatory trigger that directly undermines the Licensing Objective of protecting vulnerable persons from being exploited by gambling.

2. PREVENTION OF CRIME AND DISORDER

The introduction of another gambling venue on the High Road poses a significant risk to local public order. Acquisitive Crime: There is a documented link between high-frequency gambling and crimes such as theft or shoplifting, as individuals may resort to illegal acts to fund an addiction.

Kilburn High Road is currently facing a crime crisis. A recent week-long Met Police operation in this immediate vicinity resulted in [45 arrests for weapons and drug offences, and the seizure of over 1,100 stolen phones and large machetes.](#)

A new gambling hub provides a magnet for anti-social behaviour and acquisitive crime, such as shoplifting. We believe the High Road should be a place for community businesses, not a hub for gambling-related disorder.

3. Sheffield Judgment

We urge the Licensing Committee to scrutinise the applicant's corporate history and the *"Sheffield Precedent"* (Royal Amusements v Sheffield City Council [2025]). That judgment established that: The *"Aim to Permit"* does not compel an authority to grant a licence where locality-specific risks are too high.

Licensing conditions are often incapable of addressing *"invisible harms"* like debt and family breakdown that occur beyond the premises door. Furthermore, we note that similar applications have been refused elsewhere (such as the [Spelthorne refusal](#) in October 2025) based on risks to children and crime. Brent should not be a *"path of least resistance"* for predatory business models.

CONCLUSION

Kilburn is home to some of the most income-deprived children in the United Kingdom. Placing another new gambling venue in the heart of this community is an unacceptable risk to public safety and child welfare. We urge the London Borough of Brent Licensing Committee to put the safety of our residents above corporate expansion and refuse this licence.

Signed,

Cllr Suzanne Gallagher (Kilburn Ward, London Borough of Brent)

Cllr Stephen Malonga (Kilburn Ward, London Borough of Brent)

Cllr Paul Ryan (Kilburn Ward, London Borough of Brent)

Cllr Andre Lopez-Turner (Kilburn Ward, London Borough of Camden)

Cllr Ash Atkinson (Kilburn Ward, London Borough of Camden)