

14-05-26

Dear Licensing Committee, I write to formally object to the above application for a Bingo club premises licence at 131-135 Kilburn High Road, submitted by Golden Slots (Southern) Limited. My objection is made under the three Licensing Objectives of the Gambling Act 2005 as set out below.

1. PROTECTING CHILDREN AND VULNERABLE PERSONS FROM HARM OR EXPLOITATION The proposed location sits at a junction with high footfall of children and young people, in close proximity to local schools and food banks. Brent is currently the fifth most deprived local authority in the UK for income deprivation affecting children, with 58.7% of children living in income-deprived households. Siting a gambling venue at this location poses a direct risk of harm and normalisation of gambling behaviour for minors. Furthermore, I challenge the applicant's reliance on 2021 Census data to characterise the local population. This data is now five years out of date and materially misrepresents the current level of vulnerability in this area. Since 2019, deprivation in Brent has worsened significantly, with over half of the borough's small areas moving into more deprived deciles. Brent 021B is now the single most deprived Lower Super Output Area in all of London. I formally request that the Council applies the 2025 Indices of Deprivation data — not the applicant's 2021 figures — when assessing local risk under this objective.

2. PREVENTING GAMBLING FROM BEING A SOURCE OF CRIME OR DISORDER Late-night high-street gambling venues are well-documented as attractors of anti-social behaviour, including loitering, disorder, and an increase in petty crime such as shoplifting in surrounding retail premises. The Kilburn High Road already faces pressures as a busy urban corridor. Granting this licence risks compounding existing disorder issues, particularly during evening and late-night hours.

3. ENSURING GAMBLING IS CONDUCTED IN A FAIR AND OPEN WAY I raise concerns regarding the transparency of this application. A Bingo Hall licence permits a higher density of Category B3 gaming machines (with jackpots of up to £500) than would be permitted under a standard Adult Gaming Centre licence. I call on the Committee to scrutinise whether genuine bingo operations are intended, or whether this application represents a back-door route to establishing a high-density slot machine venue. The operator's transparency regarding its intended use of Category B machines should be examined in full. For the reasons above, I respectfully urge the Committee to refuse this application. At minimum, I ask that no decision is made until the 2025 Indices of Deprivation data has been formally considered as part of the local area risk assessment.