



Delegated Report

Change of Use Application

Application No:	20250580
Location:	Ground Floor 22 - 23 New Road, Gravesend, Kent, DA11 0AA
Description:	Change of use of premises to Adult Gaming Centre (AGC) with 8 Sports Betting Terminals (Sui Generis use).
Applicant:	I Miller, Luxury Leisure
Site Visit:	N/A Desktop Assessment

Procedural Matters

This application follows a granted change of use from Class E (Retail) to an Adult Gaming Centre (Sui Generis) from 2022 (ref. 20220456). The original application was granted permission 29 July 2022, with six conditions attached (three requiring approval) and has now expired.

Given that the original permission has expired, the details within the Covering Letter by rrplanning that the principle of the change is established inaccurate. This application must be considered within the current context of Gravesham Town Centre and against up-to-date local and national planning policy.

Furthermore, the proposal seeks to use the unit as an Adult Gaming Centre (AGC) and a Sports Betting Terminal (both Sui Generis), which is different from the original permission and would require planning permission in its own right.

Submitted Documents/Plans

- Application Form – dated 10 June 2025;
- Covering Letter by rrplanning – dated 10 June 2025;
- Supplementary Information – Noise Impact Assessment ‘Condition 5’ by Hepworth acoustics (ref. P25-031-R01);
- Drawing no. 3577(B)01 – Ground Floor and Basement Floor Plans as Existing;
- Drawing no. 3577(B)03 – Ordnance Survey Site Location Plan (scale – 1:1250);
- Drawing no. 3577(B)04 – Existing Site Plan (scale – 1:200);
- Drawing no. 3577(B)05 – Proposed Site Plan (scale – 1:200);
- Drawing no. 3577(C)01 – Ground Floor and Basement Floor Plans as Proposed.

Relevant Planning History

Reference	Description	Decision	Decision Date
20250584	Consent to display advertisement(s); Internally illuminated fascia sign and internally illuminated projecting sign x 2.	PENDING CONSIDERATION	
20250583	Erection of new shopfront.	PENDING CONSIDERATION	

20220456	Change of Use from Retail Use (E(a)) to an Adult Gaming Centre (Sui Generis).	PERMITTED	28.07.2022
20220162	Application for a determination pursuant to Article 3, Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) as to whether Prior Approval is required in respect of the proposed change of use of the existing Class E (Previously Office (B1 Use Class) and Dentists Office (D1 Use Class) at the first - fourth floors to residential (C3) to create 8 residential apartments.	PRIOR APPROVAL GRANTED	17.05.2022
20100796	Display of internally illuminated fascia sign and an internally illuminated projecting sign at fascia level.	CONSENTED	13.10.2010
20021014	Display of internally illuminated fascia sign and internally illuminated double sided projecting.	CONSENTED	30.01.2003
19950366	Retention of shopfront.	PERMITTED	26.02.1996

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS05 – Gravesend Town Centre Opportunity Area
- CS07 – Economy, Employment and Skills
- CS08 – Retail Leisure and Hierarchy of Centres
- CS11 – Transport
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- S3 – Maintenance of Shopping Frontages
- S4 – Non-Shopping Uses in the Shopping Areas

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 6 – Building a Strong, Competitive Economy
- Section 7 – Ensuring the Vitality of Town Centres
- Section 12 – Achieving Well-Designed Places

Supplementary Planning Guidance

- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)

Consultations, Publicity and Representations

External Consultees

Kent Police Designing Out Crime – We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. CCTV is advised for all areas, especially at entry points, till areas and other areas where cash handling is likely to take place, sports betting terminals, and other areas with limited natural surveillance or storage areas containing high-value equipment. Please ensure the CCTV supports the lighting plan.
2. We strongly recommend alarms, with an auto-dial function, be installed on all external doors, including emergency exits.
3. If new external doors and windows are proposed, we strongly recommend these to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+.
4. Access control. Adequate access control is required for entrances used by staff only such as storage rooms and other restricted areas.
5. Any Shutters should be as close to the building line as possible and must avoid the creation of a recess. Shutters must be certificated to LPS 1175: Issue 7, SR2; STS 202: Issue 3, BR2; Sold Secure Gold or PAS 68:2013

If ATM's are proposed;

6. The ATM be installed in accordance with the ATM Industry Association (ATMIA - Europe) & ATM Security Working Group (ATMSWG), Best Practice For Physical Security Guide, guidance, in order to complement and enhance community safety.
7. We recommend a fully monitored 24 hour attack alarm system be installed within the ATM and linked to a remote alarm monitoring company as should the shop's alarm system.
8. Other security devices e.g. forensic marking solutions, dye or note degradation packs should be installed, an ATM tracker system, a marked unique identifier/security code and signage stating that these measures have been incorporated also help deter crime.
9. Crime Prevention signage to be displayed so in an emergency if users see a skimming device or anything else suspicious around the ATM, they know who they should contact.
10. Dedicated CCTV camera to be installed to cover the front of the ATM with suitable lighting to aid image capture. IOC CCTV signage would also be required.
11. We recommend that an approved anchorage system is installed.

12. Cash limits should be kept to a minimum and appropriate filling and security measures must be in place for the protection and safety of those filling the ATM, be it a Cash In Transit (CIT) company or filling by the store staff.
13. The building, its locks and brickwork surrounding the ATM should be to the appropriate British Standard. There appear to be residential units above, these should not be made vulnerable should the ATM be attacked.

If approved, site security is required for the construction phase. There is a duty for the principle contractor “to take reasonable steps to prevent access by unauthorised persons to the construction site” under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

Internal Consultees

GBC Environmental Protection – This application uses an area of the premises for sports betting terminals for use between 0800 and 2200. It is understood that permission was granted in 2022 for an Adult Gaming Centre and conditions attached. One of which (Condition 5) related to a noise impact assessment due the residential use on the 1st floor above. It doesn't look like this condition has been discharged? The submitted noise assessment dated 03/04/2025 by Hepworth Acoustics appears to address condition 5 as it's titled 'Condition 5 Noise Assessment'.

The assessment assumes residential use above, so noise is considered on a worst-case scenario. The sound insulation of the ground/1st floor partition has been reviewed along with expected noise levels from the use. Additional upgrading measures to the partition are recommended in section 4.8 to ensure noise levels in the residential areas above are in accordance with the criteria in BS8233:2014.

It is advised that a condition is attached requiring the sound insulation works in the report to be installed prior to the use commencing. Suggested condition as follows:

Recommend Submitted Noise Mitigation Measures

The noise mitigation measures as detailed in report Noise Impact Assessment 'Condition 5' by Hepworth acoustics (ref. P25-031-R01) shall be implemented and installed by competent persons prior to the use commencing.

The mitigation measures as approved shall be retained thereafter.

GBC Licensing – The premises is currently licensed as an Adult Gaming Centre. There will have to be a variation of the AGC licence to amend the plan and an application for a Betting Shop licence. Both will need to be granted by this team before the premises can open.

Local Ward Councillors – No comment received.

Neighbouring properties

Eleven surrounding properties were consulted and three representations were received, all registering objection to the proposal.

- Previous approval expired (pre-commencement conditions not discharged)
- Separate change of use required for different Sui Generis Uses (Adult Gaming Centre and Betting Office)
- Shared access contrary to Gravesham's Statement of Gambling Licensing Policy – a separate access is required.

- Licencing application required
- Precedent set for other betting offices nationally
- Additional uses would result in an overconcentration of sui generis uses
- Contrary to Policy CS08 – affecting vitality and viability
- Other LPA decisions refusing introduction of betting offices into existing Adult Gaming Centres

The consultation period expired 08 July 2025.

Officer's Analysis

The application site is situated within Gravesend Town Centre, located within the Primary Shopping Area and application site also sits along the Primary Shopping Frontage.

The site previously operated as a retail unit last operated by New Look, the fashion retailer. It forms the ground level of nos. 22-25 New Road, which is considered to be a non-designated heritage asset that maintains original features and fenestration, which contributes to the quality of the street scene.



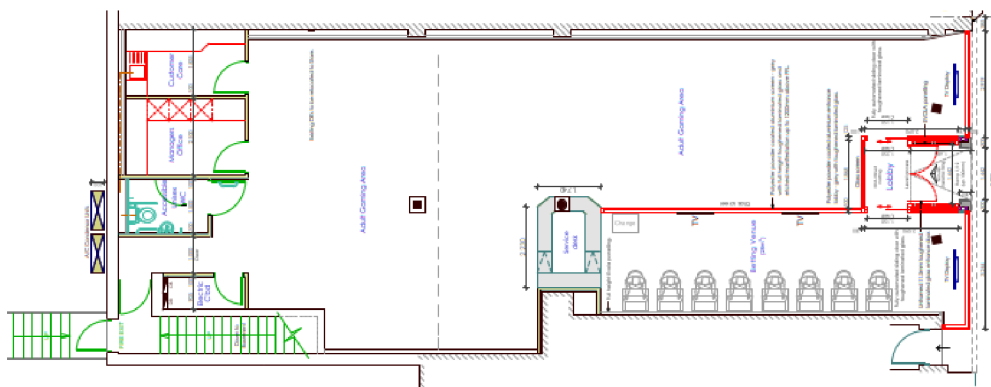
The site is directly opposite the existing Tesco, Metro store, and has a number of existing retail units within the immediate locality along New Road. However, there are also a number of vacant units nearby.

The policy context that is of direct relevance to the proposed development are CS05 (Gravesend Town Centre Opportunity Area) and CS08 (Retail Leisure and Hierarchy of Centres) of Gravesham's Local Plan Core Strategy (LPCS) (2014) and S4 (Non-Shopping Uses in the Shopping Areas) of Gravesham's Local Plan First Review (LPFR) (1994).

Proposed Development

The application seeks to change the use of the retail unit (Class E(a)) into an Adult Gaming Centre (Sui Generis) and Sports Betting shop (Sui Generis). The site would result in the loss of a retail unit along a Primary Shopping Frontage and within a Primary Shopping Area.

The submitted plans indicate that there would be a shared access, with separate, defined entrances into the distinct areas for the proposed Adult Gaming Centre and Betting Office (8 terminals).



The application site is within Gravesend Town Centre and, as such, Policy CS05 and CS08 (LPCS) and Saved Policies S3 (Maintenance of Shopping Frontages) and S4 (LPFR) are relevant.

Paragraph 90 of the National Planning Policy Framework (NPPF) (2024) maintains that decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation, planning decisions should;

- (a) *define a network and hierarchy of town centres and promote their long term-term vitality and viability by allowing them to grow and diversity in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix if uses (including housing) and reflect their distinctive characters;*
- (b) *define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a strategy for the future of each centre;*

Policy CS05 (LPCS) states that the principal focus for Gravesend Opportunity Area will be the focus for a town centre related economies and social activity. In order to achieve this, the policy seeks to consolidate the existing retail area, among other things, and also promote an evening economy.

Policy CS08 (LPCS) relates to retail, leisure and the hierarchy of centres and, in particular, seeks to protect and enhance local centres by safeguarding the retail character and function of such centres by resisting development that would adversely affect their vitality and viability and encouraging a mix of units.

Saved Policy S3 (LPFR) maintains that the Council will generally resist changes of use to alternatives other than shopping (within Use Class A1) at ground floor level or the principal trading level.

Saved Policy S4 (LPFR) maintains that the Council will allow changes of use to uses that are appropriate to the Town Centre Shopping Areas and which require a shop window frontage provided if the total number of buildings in such uses in each particular length of street is not excessive.

As indicated in the planning history above, the application site has had a long history of retail use which stems back to over 25 years.

It is noted that Part A of Schedule 2 to the Town and Country Planning (Use Classes) Order 1987 (as amended) includes Class E (Commercial, Business and Service use) which includes shops (formerly A1 use) and that, by virtue of Section 55(2) of the Town and Country Planning Act 1990 (as amended), a change in the primary use of land or buildings where the before and after use falls within the same use class, is work that does not amount to development. However, in this case, the last known use at the site was for retail use for a clothing store and, thus, the LPA need to consider the impact of the change of use to an Adult Gaming Centre and Betting Office within the Town Centre and along a Primary Shopping Frontage.

At paragraph 4.6.41, the preamble to Policy CS05 (LPCS), expands on how the Council will maximise development within the Gravesend Town Centre Opportunities Area. Of particular relevance are the following two points, which demonstrate how the Council will;

- Support and enhance retail, leisure, entertainment, cultural and tourism provision in accordance with the sequential approach;
- Support the redevelopment of under-used sites where this makes more efficient use of the sites and improves townscape character; and
- Support existing retail, commercial and service functions on the ground floors and the provision of offices and residential uses on upper floors subject to achieving a satisfactory living environment.

Evidently, the Council supports existing retail functions on ground floors while, simultaneously, supporting the redevelopment of under-used sites. Furthermore, Policy CS08 (LPCS) is explicit in what the Council seeks to achieve, which is to 'safeguard the retail character and function of existing and new centres by resisting development that would adversely affect their vitality and viability'. Paragraph 5.2.25 of Gravesend Town Centre 'will be maintained as the highest order centre within the Borough and retail, leisure, entertainment facilities and more intensive sport and recreation uses...'

Of direct relevance here, are the LPFR (1994) policies which seeks to avoid any deterioration in the quality of the shopping centre and resists changes of use to alternative, other than shopping (within the former Use Class A1) at ground floor level or principal trading level. Policy S4 is also of relevance regarding non-shopping uses, whereby the Council recognise that non-shopping units are required in the Town Centre, but caveats this that these units must contribute to the prevailing character by avoiding dead frontages and maintain the variety within the street. Policy S3, although seeking to safeguard different issues, consolidates this by ensuring that the quality of the shopping centre is maintained, by controlling uses that would lead to deterioration or weaken the shopping frontage.

The main issue for this application is the effect of the proposed development on the character and function of the Gravesham Town Centre Opportunity Area, which will be assessed in the Change of Use section. The report will continue to assess potential impact on Amenity as well as Design and Appearance.

Change of Use

As aforementioned in this report, the application site is a vacant unit, formerly a 'New Look' clothes shop (Class E). The unit has been vacant for approximately 5 years. A vacant unit within the primary shopping area is an under-used site and undermines the function, vitality and viability of the town centre.

A general survey was undertaken into the uses within Gravesham's town centre, mapping 58 units along New Road. The units have been presented in Table 1 below, which separates their uses (including vacant units):

Use Class	Number of Units	%
Sui Generis	11	19.3%
Class E	43	75.4%
Vacant	3	5.3%
Total	57	

Table 1 - New Road Survey

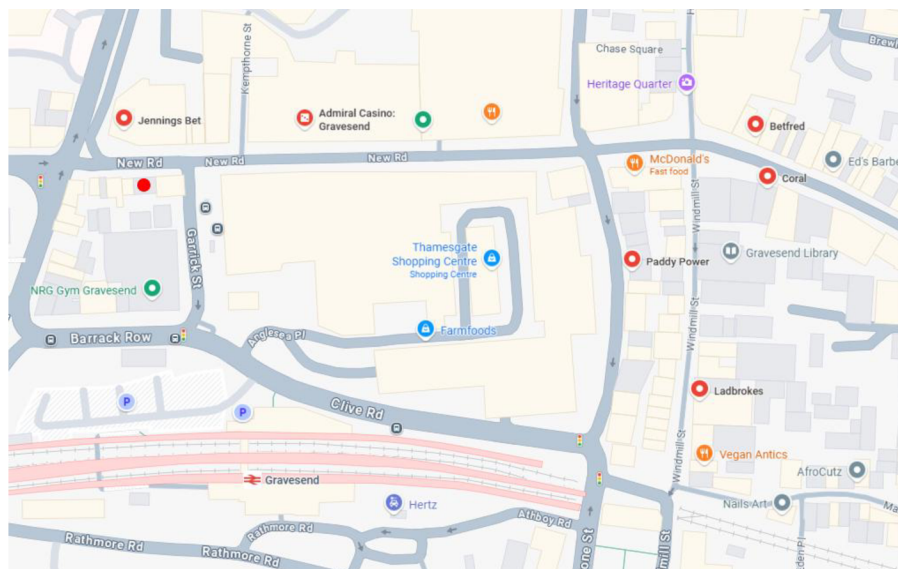
The survey demonstrates there are number of vacant units within the town centre, however the percentage of vacant units is not excessive. The survey also shows that there is a variety of uses on New Road. However, as the previous use of the application site was retail, and the proposed use as an Adult Gaming Centre (AGC) and Betting Office, the figures have been broken down further by identifying the Class E (Retail) units and the Sui Generis betting offices and AGCs. The findings are presented in Table 2:

Use Class	Type	Number of Units	%
Sui Generis	Betting Shops	1	5.3%
	AGCs	2	
Class E	Retail	22	38.6%

Table 2 - Use Breakdown

Table 2 demonstrates that just over one third of the units on New Road are in use as Class E (Retail), which amongst the other Class E uses could denote a healthy variety within the shopping area. However, three units of the eleven Sui Generis uses within the area are betting offices or AGCs, which only equates to 5.3% of the units within the survey area and would increase to 7% with the proposed AGC.

Further to the New Road survey area, the image below highlights other betting offices in the wider town centre (King Street and Windmill Street), which brings the number of betting offices and AGCs up to 7 (not including the hereby proposed use) and could be considered an over-saturation of gambling establishments:



The context of Gravesend Town Centre has not significantly changed since the previous permission for change of use to an AGC (ref. 20220456). Therefore, the LPA draw similar conclusions that “it is considered that the proposal safeguards the function of Gravesend town centre, and will increase the vitality of the area by bringing a vacant unit back into use. The LPA cannot justify a grouping of gambling uses into their assessment based on deprivation indexes and therefore the provision of three AGCs is not an over-concentration”

Objections received highlighted the distinction between an AGC and Betting Office, which fall within separate Sui Generis uses, and would require a separate change of use. While this is acknowledged by the LPA, as set out earlier the previous permission has expired and the use of the site remains as a Class E (Retail) and as such this change of use application would address both the AGC and Betting Office. However, given that the proposal seeks a betting office the clustering of both gambling and gaming establishments is required.

The proposal would result in 8 units within an 270m radius containing gambling or adult gaming facilities. Therefore, it is important to establish if the proximity of such uses would weaken the character of the shopping area as required by saved policy S3 (LPFR) and Policy CS05 (LPCS). To this point, an appeal (ref. APP/V2004/W/19/3233244) was allowed by the Inspector for a new AGC in a terraced row that already contained two AGCs. The Inspector concluded that “the proliferation of adult gaming centre uses, in particular in this terrace of units, would not be to the extent that the proposal would cause undue concern”,

as the mix of uses within the wider centre would be maintained.

Contrary to this decision, the Inspector, for the dismissed discussed previously in Finsbury Park (APP/V5570/W/20/325708), considered it would have “detrimental impact on the vitality and viability of the Town Centre” by failing “to assist in achieving a healthy, inclusive, and safe place within an area of deprivation that is susceptible to gambling related harm”. However, the Islington Local Plan policies sets restrictions that are more robust on change of use of premises within primary frontages, unless the unit has been vacant for a continuous 2-year period. Moreover, the policies state that betting shops, amusement centres and other similar uses (that the Inspector considered to include AGCs) are to be restricted when they result in negative cumulative impacts. Unlike Islington, Gravesham’s LPCS does not reference gambling establishments, instead more generally encouraging mix, and places no such time restrictions on the changes of use for premises. Therefore, in this instance, although the AGC and betting office uses are clustered within town centre area, the wider mix of uses in the centre will be maintained and the shopping frontage will be improved from its current state as a vacant unit, in accordance with saved policy S3 (LPFR).

The neighbour representation objected to the development on the grounds of the proposed change of use being contrary to policy and the AGC/betting office would cause harm to the town centres retail function. The majority of the issues raised have been considered in this section, specifically the mix of uses within the town centre and oversaturation of Sui Generis uses.

Lastly, the neighbour response commented on the loss of another retail uses, and its impact on viability and vitality town centre. The established retail market has changed considerably in recent years with the introduction and significant uptake in online shopping, which has had an impact on primary shopping areas and resulted in a decrease in retail shops within these areas. Moreover, the proximity of large shopping centres such as Bluewater has affected the viability of town centres of Gravesend and surrounding towns. The LPCS and LPFR policies do not preclude the addition of AGCs or betting offices in the town centre. Instead, as highlighted above, they seek to restrict the numbers of uses in order to ensure that proposals maintain and enhance the vitality and viability of the town centres’ retail and service function, and that they do not result in an unacceptable concentration of uses or in unacceptable effects on the amenity, character and function of the area. Therefore, this proposal is not considered to undermine the provision of shopping services in Gravesend’s town centre, nor impact the vitality or viability of the centre, but would bring a vacant site within the primary shopping area back into use.

It is acknowledged that the previous report (Appendix 1) deduced that “the LPA do consider that the provision of any additional uses would be an over-concentration to the detriment of the retail function, viability and vitality, and would not support any future applications for such a change of use”. In this case, the change of use would provide an additional AGC and betting office, however these are contained within one unit and for the purposes of the viability and vitality of the Town Centre would not result in any greater detriment than the sole AGC as approved in 2022 (ref. 20220456).

As such, subject to conditions, the proposal is in accordance with Policies CS05 and CS08 (LPCS), saved Policies S3 and S4 (LPFR), as well as paragraph 85 of the NPPF (2024).

Amenity

Policy CS19 (LPCS) seeks to protect amenity and ensure acceptable future living conditions. The NPPF (2024) also assists and seeks to ensure developments will function well, do not undermine quality of life and create attractive and comfortable places to live, work and visit and seeks to “secure high-quality design and a good standard of amenity for all existing and future occupants of land and buildings”.

Under this proposal, the key issues that would affect neighbouring amenity relate to the hours of operation, noise, social effects of gambling and car parking. Comments on these aspects are as follows:

NOTE: - It is important to highlight that a Prior Approval Class MA application was approved for the change of use of the upper floors of 22-25 New Road to no.8 apartments.

Hours of Use and Employment

The application proposes that the AGC would be open 24/7 as per the previous application (ref. 20220456), with the betting office only operating between 08:00-22:00 (14hrs). These opening hours are managed by Licensing.

Through a wider investigation into other AGCs in surrounding towns, 24/7 opening hours are common for this type of use. The other betting offices also operate similar hours to the proposal. Therefore, it would be inappropriate for the LPA to object to the proposed opening hours of the unit.

The proposed use will employ up to 12 full time members of staff.

Noise

The application has been supported by a noise impact assessment, which has been reviewed by GBC Environmental Protection. The assessment assumes residential uses above the unit, and has assessed noise on a worst-case scenario, considering the sound insulation of the ground and first floor partition and the expected noise levels from the AGC and betting office. It concludes that additional upgrades are recommended to ensure that noise levels in the residential areas are in accordance with BS8233:2014 criteria.

In order to ensure that the recommended upgrades are carried out, Gravesham's Environmental Protection officers have suggested a planning condition to implement and install noise mitigation measures prior to the use commencing.

Subject to the suggested condition, the amenity of surrounding residents would be safeguarded in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2024).

Effects of Gambling

The Department of Health and Social Care commissioned Public Health England (PHE) to undertake a review of evidence on gambling harms (2019). Public Health England (PHE) were requested to 'inform and support action on gambling-related harm as part of the follow up to the Department for Digital, Culture, Media and Sport-led review of gaming machines and social responsibility'.

The review identified that the types of harms associated to gambling are:

- financial
- relationship disruption, conflict or breakdown
- mental and physical health
- cultural
- employment and education (referred to as reduced performance at work or study)
- criminal activity

The public health issues and harm resulting from gambling arising from the PHE report are acknowledged, however, AGC uses are deemed legitimate and the use would be subject to a separate licensing regime under the Gambling Act 2005. The Gambling Act 2005 would ensure that the proposed use would operate in a manner that addresses certain issues related to gambling. Therefore, although there are public health issues and research demonstrating harmful risks associated to gambling, due to AGCs being legitimate uses and the position of the Gambling Act 2005, there is not adequate grounds for the application to be refused for such concerns.

Parking and Highways

Policy CS11 (LPCS) seeks to ensure that new developments mitigate their impact on the highway and

provide sufficient parking in accordance with adopted parking standards.

The application site is located within the town centre, with good access to surrounding public car parks in the St George's and other nearby car parks. Therefore, although the proposal would result in a net increase of 10 employees (on the current situation), it is not considered to result in any significant additional vehicle movements nor have any adverse impact on the highway network, and would be in accordance with Policy CS11 and paragraph 116 of the NPPF (2024).

Design and Appearance

The design and appearance of the shopfront and advertisements are considered in separate application (ref. 20250583 / 20250584).

Conclusion

The application has been fully considered and is in accordance with local and national planning policy.

The site is a vacant and unused unit with the primary shopping area of Gravesend town centre. Although Adult Gaming Centre and Betting Office uses are present within the town centre, the introduction of a new unit would not result in an over-concentration and will bring a vacant unit back into use, which strengthens the viability and vitality of the area, without undermining the provision of shopping services given the existing mix. Therefore, the principle of changing the use of the unit to an Adult Gaming Centre and Betting Office is considered to, subject to conditions, accord with Policies CS05, CS08 and CS19 (LPCS), saved Policies S3 and S4 (LPFR), as well as paragraph 86 of the NPPF (2024).

The proposed use will be conditioned to ensure that noise upgrades are implemented and installed prior to the use commencing, which will safeguard neighbour amenity in accordance with Policy CS19 (LPCS). There are no highway concerns with the proposal.

Lastly, consideration was made towards the public health concerns surrounding AGCs and gambling. Whilst the harmful impacts are concerning, the provisions of the Gambling Act 2005 controls the operation of uses such as AGCs. Moreover, given that AGC and Betting Offices are legitimate uses there is little grounds to refuse the application on public health concern.

Overall, it is recommended that the application is permitted, subject to conditions.

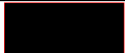
Recommendation

Permission

Suggested Conditions

- Time Limit
- Approved Plans
- Restriction on Use
- Noise Insulation Improvements

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mr Ethan Bonthron	Team Leader:	Richard Hart
Signed:		Signed:	
Dated:	13 th August 2025	Dated:	15 th August 2025

