

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 25/06/2025 4:41 PM from [REDACTED]

Application Summary

Address:	Ground Floor 22 - 23 New Road Gravesend Kent DA11 0AA
Proposal:	Use of premises as Adult Gaming Centre (AGC) with 8 Sports Betting Terminals (Sui Generis use).
Case Officer:	Mr Ethan Bonthron

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	[REDACTED]

Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application

Reasons for comment:

Comments:	We act on behalf of Done Brothers (Cash Betting) Limited, trading as Betfred. The applicant is proposing that they can include the sport betting terminals under the AGC use classification. The 8 sport betting terminals would be within their existing premises, as an entirely separate, designated and distinct area within the premises where customers would have the ability to place bets on sporting fixtures. A separate designated distinct area is necessary, given the licensing requirements that they will be obligated to adhere to in the event that a betting office licence is granted for this area. We believe on behalf of our client that planning permission is required for a specific change of use from an adult gaming centre, sui generis, to a betting office, sui generis, in respect of this separate designated and distinct area within the premises. It can be seen on the proposed floor plans submitted with the application that the 8 sport betting terminals will be separated from the adult gaming centre through the use of walls and a completely new entrance into what has been described as the 'betting venue'. What is clear from the proposed layout, is the requirement to share facilities with the adult gaming centre unit, including staffing area/counter, which serves both uses, and toilet facilities, this new area within the premises, the subject of this application, cannot accommodate recognised and necessary staff and customer facilities in its own right. It is our firm opinion that the applicant will be required to make an application, in due course, for a betting office licence if they wish to provide 8 self-service sport betting terminals to customers using the premises, because their existing (adult gaming centre) licence prohibits them, from doing so. The application will no doubt be subject to appropriate scrutiny (by responsible authorities, local residents and businesses, and ultimately by the licensing authority) having regard to those factors that are relevant when determining such an application under the Gambling Act 2005. On that basis, we respectfully submit that moves by this applicant to provide 8 self-service sports betting terminals, in what will be, in effect, a betting office operating from within their premises, should also be subjected to the same level of planning scrutiny, involving as it does, a material change of use, especially in the separate designated and distinct area within their premises.
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As one of the country's leading betting shop business owners, (trading as they do over 1,400 betting shops) Betfred are understandably concerned at this applicant's approach to the planning regime, when proposing a sub-division of their unit, to create a separate betting office premises within their existing adult gaming centre premises, arguing as they do, that there are no sound planning reasons for a refusal of this application when one is dealing with different sui generis uses which they contend "share similar characteristics". Arguably the grant of this application would, in our client's view, create a very dangerous precedent.

Notwithstanding this fundamental concern regarding the premise of the application, having due regard to the merits of this application and local planning policy, detailed development control policies are contained within the Gravesend Local Plan Core Strategy Adopted 2014. These premises are located in the defined primary shopping frontage of Gravesend Town Centre. Policy S3 does not restrict the use within Primary Shopping Frontages to retail but is not considered appropriate on a primary frontage. The implementation of this separate, designated and distinct area within this premises will increase the number of gambling units within the Primary Shopping Frontage. This change would impact the vitality and viability of the area and go against the approval within the officer report. The officer report for the approval of the AGC (20220456) states:

"However, the Local Planning Authority considers that this use is on the balance and therefore is extremely unlikely to support any other developments of the same use within the town centre, tipping the balance contrary to relevant policies."

The addition of the 8 self-service betting terminals within the separate area of the premises essentially adds another gambling unit to the Primary Shopping Frontage and Primary Shopping Area, going against what the officer of the recent approval states.

In all respects, no evidence has been presented that would lead to any other decision but to refuse planning permission for this proposal.

We reserve the right to make further comment on any additional matters the applicant may choose to raise in response to these representations.

Kind regards