

**GAME NATION, 22 - 23 NEW ROAD, GRAVESEND,
DA11 0AA**

**CITY GAMING LIMITED
PLANNING APPLICATION**

**Change of Use from Retail Use (E(a)) to an Adult Gaming
Centre (Sui Generis)**



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1. Background

1.1. This planning application is prepared and submitted by Andrew Woods of Woods Whur Solicitors, St James House, 28 Park Place, Leeds, LS1 2SP and 42-46 Princelet Street, London, E1 5LP. It is submitted on behalf of City Gaming Limited for change of use in respect of 22-23 New Road, Gravesend, DA11 0AA, from retail use (formerly A1 now Class E(a)) to Adult Gaming Centre (sui generis). Registered Title Number K633844.

1.2. This planning submission deals with the application site in question, and included within the planning submission is a Planning and Heritage statement, as well as a Design and Access statement. The Planning and Heritage statement specifically deals with National Planning Policy and Local Planning Policy.

1.3. There are photographs of the application site and surrounding area, as well as evidence as to the vitality and vibrancy that Adult Gaming Centres will add to an area by attracting local shoppers who will use this Adult Gaming Centre as well as other local facilities. This has been considered in several planning inspector appeal decisions, and those appeal decisions are also included, together with a summary of this application.

1.4. City Gaming Limited operates Adult Gaming Centres across the UK, and currently operate in excess of 60 Adult Gaming Centres. An application will be made for an Adult Gaming Centre premises licence under the Gambling Act 2005, and City Gaming Limited will

ensure that the operation of these premises complies with both any relevant planning permission and any premises licence.

1.5. City Gaming Limited have agreed a lease of 15 years with £45,000 a year rent. The shop previously traded as a New Look store, and has been vacant for a couple of years. The adjacent premises are also vacant, as are a number of other premises on New Road. It is proposed the company will invest £125,000 in upgrading the premises, and employ 10 staff.

1.6. It is noted in the Gravesend Local Plan that in the shopping street frontage, the borough Council will generally resist changes of use to alternatives other than shopping (policy S3), but it is noted in policy S4, that the borough Council will allow changes of use to uses which are appropriate to the Town Centre shopping area, which require a shop window frontage and provided that the total number of buildings in such uses in each particular length of street is not excessive.

1.7. There are several reasons set out in this planning statement, together with supporting evidence as to why it would be appropriate to allow this application, and those reasons include, but are not limited to, the following:

- The premises have been vacant for 2 years
- The adjacent premises are also vacant as are other units on New Road and King Street (evidence provided).

- The photographs submitted show a significant number of other units, including the former Debenhams store, as closed and vacant.
- There is only one other Adult Gaming Centre in the pedestrianised area of New Road (Admiral - 45 New Road). A second Adult Gaming Centre in the pedestrianised area would be a common feature of Town Centre shopping areas.
- Evidence is submitted as to the benefit that Adult Gaming Centres bring to the economy.
- Additional employment would be created.
- Additional investment in the Town Centre would be provided, in a Town Centre which is in need of investment.

1.8. The use of the application site as an Adult Gaming Centre will complement other retail and leisure uses in the area, and would provide some regeneration in an area which has seen decline during the pandemic.

1.9. Adult Gaming Centres contribute to the economy of an area, and reports confirm that for every £10 of turnover directly generated by an Adult Gaming Centre, a further £8.04 worth of turnover is supported in the wider economy. For every 10 jobs directly generated by Adult Gaming Centres, a further 7.2 jobs are supported in the economy.

1.10. The impact of the new class E usage, as part of the new National Policy Planning Framework, should be considered when applying local policies. The impact of online shopping and the COVID-19 pandemic should also be considered when dealing with a vacant

unit as should the impact of the new class E usage (referred to in the Planning & Heritage Statement) when assessing local policy.

Gravesham Borough Council

2. The Application Site

2.1. The application site is a ground floor premises situated at 22 - 23 New Road, Gravesend, DA11 0AA. The premises have been vacant for 2 years. The adjacent premises is also vacant, and has been for some time.

2.2. The applicant company has worked with the marketing agent to acquire this site, and agreed a permanent lease subject to licensing and planning. The operation of a second Adult Gaming Centre on New Road will benefit other outlets in the locality by attracting local customers who will use both the Adult Gaming Centre and other units.

2.3. The application site is situated in the pedestrianised area of New Road, which is showing evidence of retail decline with a number of stores closed and not trading. These include the following:

- The Debenhams store which was a major retail site on New Road, Gravesend, closed in May 2021, and remains empty. Reports in 'Kent Online' quote people as saying: 'I don't think there will be much point in coming to the town anymore, there is nothing here,' 'There is probably no reason to come into Gravesend now.' Alternatively, the director of communities at Gravesend Borough Council is quoted as saying that 'the loss of the High Street giant does not mark the death of town centres, but rather opens up an opportunity for rejuvenation.'

- In March 2020, New Look announced it was closing all of its stores, including the 20 stores in Kent. This included the Gravesend site, which appears to be have been vacant for over 2 years.
- The unit adjacent to the old New Look site is also vacant.
- The Thomas Cook store on New Road has closed and is vacant.
- The PureGym store on New Road is closed and vacant.
- The Warren James store is closed and vacant.
- There are also vacancies and closed shops/units on King Street.

2.4. There are units remaining on New Road which do attract customers to New Road, including a large Tesco Express, Primark, McDonalds, B&M, as well as financial uses.

Approving change of use to allow this empty unit to come back into use is not contrary to the intention of the policy and must be seen as beneficial to the area.

2.5. The pedestrianised area of King Street which also has vacant units appears to be more of a secondary area with a mixture of leisure including pubs, betting shops, barbers and restaurants. It is noted that there are 2 betting offices, namely BetFred and Coral Racing, on King Street, as well as the Paddy Power on Stone Street. This is a fairly common occurrence on town centre streets, and it is not uncommon to see 3 betting offices, just as it would not be uncommon to see 2 or 3 Adult Gaming Centres. Adult Gaming Centres and betting offices are completely different operations.

2.6. The applicant company is a highly respected operator of Adult Gaming Centres, with a senior management team with significant experience. It has agreed a 15 year lease subject to planning and licensing, and will invest both financially in the site (refurbishment will be £125,000), as well as employing in the region of 10 staff. The unit above the proposed Adult Gaming Centre is an empty commercial office which is not part of the proposed lease.

2.7. The vibrancy and vitality of the local economy is not benefitted by having an empty shop, especially when there are a number of empty shops in the area.

2.8. There is no over-concentration of such uses in the area. There is an Admiral Adult Gaming Centre 3 units away, and the provision of the second Adult Gaming Centre will provide customer choice on New Road, just as there is customer choice for betting offices on King Street.

2.9. Adult Gaming Centres do not result in undue noise and disturbance from customers, and provide a limited catering offering providing customers with tea, coffee, soft drinks and biscuits.

2.10. Customer usage of the AGC will be a cross-section of adults, and is generally 50% split male and female. A significant proportion of the customer uses will be those who are in the area visiting other facilities and this will contribute to the vitality of the area.

2.11. The appearance of the Adult Gaming Centre would have characteristics which are very similar to retail shops, and their window displays have been compared to shops by planning inspectors dealing with the appeals.

2.12. Visually in terms of its attraction to New Road, the proposal would have characteristics similar to a shop.





1 Location Plan
Scale 1:1250

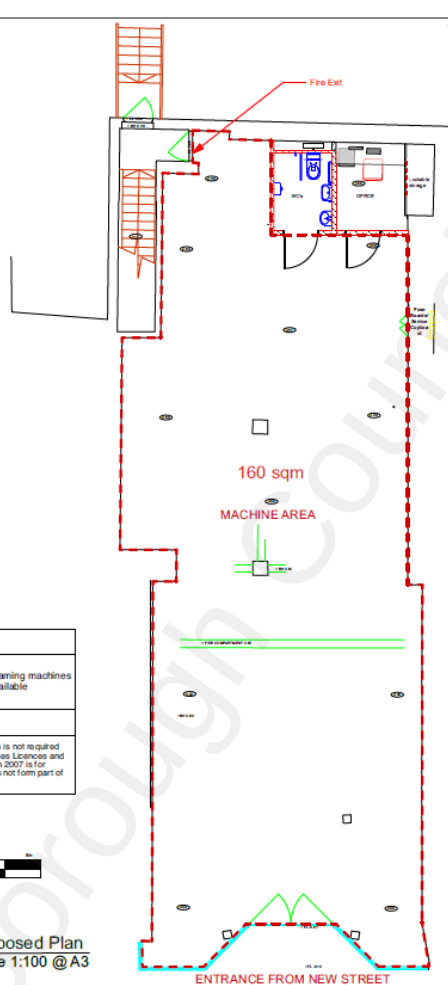


2 Block Plan
Scale 1:500

KEY:	
---	Area in which gaming machines will be made available
General Note:	
Anything shown on this plan, which is not required by the Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for illustrative purposes only, and does not form part of the premises licence.	



3 Proposed Plan
Scale 1:100 @ A3



REVISION NOTES:
REV A: 01/04/22 - Removed Cleaners Cupboard
REV B: 05/04/22 - Added Street name

CDM Notes:
These drawings to be used in conjunction with Risk Register & Designation Information Overview Plan, to be provided by all parties.

- Notes
- These drawings have been prepared with supplied information.
 - Contractor to carry out all drawings and ensure all measures of required works & report any discrepancy or build concerns, issues to the designers for resolution prior to any commencement.
 - Issuing services software at the time of drawings production.
 - These drawings to be used in conjunction with all associated project drawings, British standards & relevant complementary information supplied.
 - Contractors structural engineer to confirm all required details, fixings and substructure.
 - All elements to be fabricated with due consideration to H&S issues, including but not restricted to - manual handling during of stages, manufacture, delivery, site construction and final dismantling.
 - All glass elements to be toughened and to glaziers requirements.
 - Principal Contractor/Future Manufacturer to produce "Safe" drawings for approval & "Safe" drawings on project completion for final completion into the O&M Manual and the H&S File.

DRAWING STATUS:
For Information Only
(NOT FOR CONSTRUCTION)

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CLIENT

Game Nation

PROJECT
22, 23 New Rd, Gravesend
DA11 0AA

DRAWING TITLE
Licensing Plan

CONTACT	SCALE @ A3	DATE
D.M	1:100	23.02.22
JOB N°	DRAWING N°	REV.
1729	GRA_GA002	B

This drawing is not for construction.
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Any errors and omissions are to be reported to the designer.
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3. Planning and Heritage Statement

Documents considered

- National Planning Policy Framework and Guidance
- Gravesend Local Plan
- Planning History
- Planning Current Use

The Application

3.1. The application is to change the use of the ground floor of 22-23 New Road, Gravesend, DA11 0AA from a retail use (closed) to an Adult Gaming Centre (sui generis).

The application should be considered against the policies listed above, and in particular those making up the development policy pursuant to s38(6) of the Planning and Compulsory Purchase Act 2004.

3.2. The application site has been made available to the application as it is currently vacant and has been for 2 years. The term of the lease that the application has agreed to subject to licensing and planning is 15 years, and there will be an investment in the region of £125,000.

3.3. This Planning and Heritage Statement addresses the relevant documents set out above in 'Documents Considered', provides an overview of the application and concludes that the planning application is acceptable and planning permission can be granted accordingly.

3.4. City Gaming Limited is a well-regarded operator of Adult Gaming Centres, and its management team have considerable experience in operating such premises. Between them they hold 15 Personal Management Licences issued to Individuals by the Gambling Commission. The company holds a Gambling Commission operating licence, and has done so since 27 November 2018, and has not any issues at its other premises which may impact at all on this project. It has a full range of policies and procedures ensuring that the licensing objectives and the Gambling Act 2005 are met at all times, and take such responsibility to promote socially responsible gambling very seriously.

3.5. The application site is situated on New Road. This is a destination area for shoppers with some financial services provided, leisure facilities and financial services. The surrounding area also has a wide range of uses which include a mixture of retail and leisure.

3.6. The premises are situated in the primary shopping area and on the primary shopping frontage. Policy CS08 at paragraph 5.2.24 states 'the Council will seek to reinforce a sustainable network and hierarchy of centres by maintaining the sub-regional role of

Gravesend Town Centre; protecting and enhancing existing local centres; creating additional local centres to meet local retail needs, generated by new developments on key sites. In support of this, the Council will;

- Apply a sequential approach to the location of main town centre uses.
- Require an impact assessment of larger retail and leisure development.
- Support development of a scale and type appropriate to the position of the centres in the hierarchy and their character.
- Safeguard the retail character and function of existing a new centre by resisting development that would adversely affect their vitality and viability.
- Encourage the provision of a mix of units including opportunities for small shops and independent traders in all centres.

3.7. Policy S3 states that in shopping street frontages, the borough Council will generally resist changes to alternatives other than shopping, and Policy S4 states that in those shopping street frontages, the borough Council will allow change of use to uses which are appropriate to the town centre shopping area, and which require a shop window frontage included uses falling within the use class A2, provided that the total number of buildings with such uses in each particular length of street is not excessive.

3.8. The provision of a second Adult Gaming Centre on New Road would not be excessive.

3.9. The provision of an Adult Gaming Centre at 22 - 23 New Road is wholly appropriate to the town centre shopping area. There is already one Adult Gaming Centre (Admiral) on New Road, which clearly complements other uses within the shopping area.

3.10. There will be no adverse effect on the vitality and viability of New Road by the approval of this change of use application. In fact, the approval of this change of use application will positively affect the vitality and viability of the area by bringing new employment and customers to the area, as well as increasing the length of time customers spend in the area. This submission has been supported by planning inspectors in some of the various appeal decisions which are included within this document at section 7.

3.11. The impact of the new class E usage as part of new National Policy must impact on the weight of the attached to the existing local policies. Class E now includes previous uses, class A1, A2, A3, B1A, B1B, B1C, and some D1 and D2 uses. This is a change in National Policy introduced in September 2020, and must impact on the approach taken by local authorities in applying their current policies.

3.12. It is not uncommon to see the High Street changing from predominantly retail to more of a mixed use (with retail still remaining predominant) and this reflects the way in which High Streets have changed in recent years. It is clear that the change introduced in September 2020 was designed to avoid policies overprotecting the former class A1 use.

National Policy

3.13. The NPPF (2021) sets out the presumption in favour of sustainable development.

3.14. The trend of national policy guidance towards non-retail uses has, since the issue of DCPN11 in 1985, been towards increased diversification through successive versions of PPG6, PPS6 and the Portas Review.

3.15. The trend of Government guidance is towards more flexibility of use and de-regulation in the form of changes to the GDO over the last few years, allowing greater flexibility of use.

3.16. Whilst the proposed use fall outside the use classes (it is sui generis), it is to be noted that class E (which includes retail and financial services) now also includes a broad range of non-retail uses not only for visiting members of the public but also for office, sport and recreation which have no affinity with shopping. The proposed usage equally appeals to shoppers and visiting members of the public who would also be using the other units in the vicinity. Although an Adult Gaming Centre is classed as Sui Generis Use, it is clearly a use which is very similar to those within Class E, in that it will attract visiting members of the public for recreation and will compliment all of the uses in the area.

3.17. There are three aspects of sustainable development, being those with an economic role, those with a social role and those with an environmental role:

- If the application is granted then additional jobs will be created and stability will be brought to the unit.
- City Gaming Limited actively promote social responsibility through their training and compliance measures, and these include protecting the vulnerable, protecting children, advertising Gamcare and other advice or support agencies, ensuring that gambling is fair and open.
- Liaising at all times with local responsible authorities and residents.
- Age verification measures.
- CCTV.

3.18. An economic role considers proposals which contribute to building a responsive, competitive and strong economy. This usage contributes to a strong economy. Customers using the Adult Gaming Centre will be customers who will also use the other facilities in the high street, and vice versa. The provision of this new facility, with its significant investment, will add to the strength of the high street. Various planning inspectors have found on appeal that Adult Gaming Centres clearly add to the vibrancy and vitality of New Road.

3.19. A social role requires the support of a strong, vibrant and healthy community. This Adult Gaming Centre would employ local people, and would become part of the community. Its location at 22-23 New Road would attract local people using other local facilities.

3.20. Finally an environmental role involves contribution towards protecting and enhancing the natural, built and historic environment. The investment, both in the interior of the building and exterior, will add to the vitality of the area.

3.21. There is no conflict with national policy. Adult Gaming Centre's are an accepted 'main town centre use' – having regard to the 'sequential test' (as set out at para 86 of the NPPF) the first preference for such uses is to be located within town centres.

3.22. Paragraph 001 of PPG Town Centres and Retail (July 2019 Update) confirms that LPAs need to consider structural changes in the economy, specifically changes in shopping and leisure patterns and format. It goes on to state that a wide range of complementary uses can help to support the vitality of town centres, including leisure and entertainment.

3.23. The premises are vacant and empty.

3.24. Under the Gambling Act 2005, which is the legislation covering the licensing of Adult Gaming Centres, the nature of the gaming machines on a premises is defined by the premises licence issued under the Gambling Act 2005. Adult Gaming Centres may offer a mix of B3, B4, C and D licence type gaming machines.

3.25. An Adult Gaming premises machine is also characterised by the charge and stakes available. No one under the age of 18 years is allowed to enter an Adult Gaming Centre.

22 - 23 New Road

3.26. The Business & Access Statement submitted refers to the general operation of the Adult Gaming Centres. There will not be any noise or disturbance to adjoining commercial uses or residents in the area. Noise and disturbance has never been an issue for City Gaming Limited's Adult Gaming Centres. Unlike Betting Offices there is no live sport in the shop and there will be no adverse noise at any time.

3.27. The design and use of the Adult Gaming Centre will contribute to economic, social and environmental sustainability. The proposal will generate a minimum of 6 full time and 4 part time jobs. The proposal will not lead to the closure of any other gambling sites or loss of any other jobs, and as such, weight can be given to the economic benefit of the creation of employment.

3.28. There are no material physical alterations. The setting of the Adult Gaming Centre will not harm the high street, as no change, other than advertising the Adult Gaming Centre, is proposed to the frontage.

3.29. The proposed use will mainly be used by local residents, tourists and those on a shopping trip. Further, its appearance and function which is shop- like would be appropriate to the building.

3.30. The applicant will successfully integrate within the high street / retail environment. Their primary function is to provide services and/or sales to visiting members of the public, and to provide a form of service to visiting members of the public. This addresses a primary function of Town Centre usage.

Other Submissions

3.31. Whilst every application has to be considered on its merits, it is relevant to consider matters referred to in other decisions relating to Adult Gaming Centre usage.

3.32. It is important not to base any decision on a general view that Adult Gaming Centres may not be an appropriate usage for a particular site. Adult Gaming Centres are lawfully permitted to operate under the Gambling Act 2005 in the same way that Betting Shops are lawfully permitted to operate under the Gambling Act 2005. The Gambling Act 2005 sets out the licensing objectives which must be promoted at all times by an Adult Gaming Centre operator which include the prevention of gambling being connected with crime, as well as

the protection of the vulnerable. As an Adult Gaming Centre operator licenced by the UK Gambling Commission, this applicant has in place policies and procedures which ensure that the licensing objectives under the Gambling Act 2005 are met. These matters are properly left to the Gambling Act 2005 applications, which will be considered by the Gravesham Licensing Department.

3.33. Matters which are properly addressed by other legislation, and in particular the Gambling Act 2005, should not be relevant to this application.

3.34. It should be recognised that Adult Gaming Centres (and betting shops) are an established part of high streets and shopping centres throughout England and Wales.

3.35. Customers who visit an Adult Gaming Centre will be using other facilities and venues within the area, and an Adult Gaming Centre usage would complement and support the other uses. Additional pedestrian traffic will be created in the area. This development will increase activity in this locality from its present levels in the daytime.

3.36. In an uncertain time following the pandemic, it would be detrimental to the area for this unit to remain vacant.

3.37. There is no evidence that an Adult Gaming Centre at this site will adversely impact on residents in the area or on the area generally.

3.38. There are a number of relevant planning inspector appeal decisions referred to in section 7 which conclude the following:

- The benefit of bringing a vacant unit back to use
- Adult Gaming Centres being complimentary to the shopping environment
- Maintaining the diversity of uses and lowering vacancies

3.39. Adult Gaming Centres fall within the definition of a main town centre use.

4. Business and Access Statement

Introduction

4.1. The application seeks planning permission for a change of use of the ground floor of these premises from the retail use to an Adult Gaming Centre, a sui generis use commonly found in town and district centres.

4.2. The premises occupy the ground floor of the site at 22 - 23 New Road, Gravesend, DA11 0AA.

4.3. The Adult Gaming Centre area is 160 sqm- title number K633844. The freehold owner is Lownie Investments Ltd .

4.4. The projected cost of works is £125,000. No work has yet commenced.

4.5. The proposed premises will occupy the ground floor and the surrounding area has a variety of premises, including food and drink, retail, banks, estate agents. The proposed premises will complement the existing uses and shoppers will use both the existing units and the proposed Adult Gaming Centre.

4.6. The various ground floor uses in the area reflect the character of the area and the scale of the proposal as a shopper orientated adult gaming centre is consistent with the surroundings. In terms of appearance, the proposal will not change; the existing appearance will be maintained.

4.7. The proposal is for a change of use of the ground floor only.

4.8. No landscaping is proposed.

4.9. Internally a disabled toilet will be added to the rear of the ground floor to provide access to the facilities for disabled customers and staff in line with the Equality Act 2010. There will also be an office and storage facilities as well as the main machine area.

Adult Gaming Centre Use

4.10. City Gaming Limited is an operator of Adult Gaming Centres which holds an operating licence issued by the Gambling Commission. An application is being made for change of use at this site and an application has been made to the Local Authority for a premises licence under the Gambling Act 2005. In support of the premises licence application City Gaming Limited will submit a full local area risk assessment to the local authority which will set out

how the licensing objectives referred to in The Gambling Act 2005 will be met. Staff at the premises will be highly trained and customers will receive face to face service.

4.11. The senior management team at City Gaming Limited has been operating Adult Gaming Centres for many years and between them have operated a considerable number of sites.

4.12. The machines offer low stakes ranging from 10p to a maximum of £2 and the average stake in an Adult Gaming Centre is between 30-50p. Adult Gaming Centres have been on the high street for many years. Unlike other gambling operations, staff do not remain behind a counter, but remain on the floor with the customers. There are no Fixed Odds Betting terminals in Adult Gaming Centres.

4.13. These premises will be no noisier than a shop as there will be no noise generated by the premises. The customer usage of this shop would be the same type of person as attracted by nearby shops, but in smaller numbers.

4.14. The premises will attract local people who are using the high street for other activities and local residents. The customer split will be 50% male and 50% female and customers often visit on their own or in a couple but rarely in larger groups. Teas and coffees are provided to customers.

4.15. As the premises are situated on the Ground Floor of a building noise will not escape from these premises and disturb residents but in any event there are never any problems with noise at Adult Gaming Centres.

4.16. No person is allowed on the premises who is intoxicated and appropriate signage will be on display. There will be a significant investment in both the premises and the employment of people. The proposed level of investment will create a gaming destination for shoppers and residents in the area. Adult Gaming Centres are regularly found in the centre of many High Streets and many town centres have more than one AGC in the area. This use relies on pedestrian flows and trades successfully in many shopping areas and contributes as a complimentary use to the overall attraction of the area. There will be no adverse impact and there is no evidence of any anti-social behaviour connected to such use.

4.17. There is a statutory obligation to not allow under 18s into the premises and a mandatory condition will be placed on the Premises licence that under 18s must be excluded from Adult Gaming Centres. The premises will also operate Challenge 25 which requires all customers who appear to be under 25 to show Identification to verify their age.

4.18. It is important to note that the proposed use as an Adult Gaming Centre is strictly regulated by the local authorities licensing authority, which is legally obliged to take into

consideration the three licensing objectives, which include keeping crime out of gambling premises and the protection of children from harm. Should there be any issues with Adult Gaming Centres, then action can be taken against the Gambling Act 2005 premises licence.

4.19. City Gaming Limited are committed to designing a high quality Adult Gaming Centre which is fully serviced and accessible to all customers. The site has access to all local transport and amenities, including free and pay and display car parks nearby.

4.20. Customers will have direct access to the Adult Gaming Centre from New Road.

Access

4.21. The proposal is on New Road. It could not be better located in terms of accessibility by all means of transport. The applicant expects most customers to be on foot.

4.22. All customers will continue to access the Adult Gaming Centre from the front. There is no change to the existing doorway, and access will remain as it was with the bank. There is no change to the width of the door entrance, and the public will have no difficulty in accessing the unit.

4.23. The proposed Adult Gaming Centre would be accessible by a choice of transport modes which all serve Gravesend currently which will ensure access for all parts of the community.

Conclusion

4.24. The proposal accords with national policy.

4.25. It accords with local policies.

4.26. There will be no harm to retail vitality or diversity.

4.27. Adult Gaming Centres are established within hundreds of town centres, adding diversity and choice of uses in town centre locations.

4.28. The proposed change of use will create new employment and there will be additional investment by the applicant.

4.29. There are other material considerations which reinforce the presumption in favour of granting permission.

4.30. The proposal would maintain and enhance the vitality and viability of the area and provide night time activity.

Gravesham Borough Council

5. Photographs

1. View up Stone Street
2. Debenhams Store - Closed
3. Thomas Cook Store - Closed
4. PureGym - Closed
5. Application Site
6. Warren James - Closed
7. Empty Unit - King Street
8. Empty Unit - King Street
9. Empty Unit - King Street











Gravesham Borough Council









6. Adult Gaming Centres and The Economy

7.1. Bacta has announced that the adult gaming centres industry contributed £126.8m in tax revenues to the exchequer, had a turnover of £750 million, and employed well over 7,000 people in 2019. The figures, which can be found in a new report from the Centre for Economics and Business Research, highlight the significant contribution the industry makes to the UK economy.

7.2. With all this taken into account, it is therefore possible to create an overall contribution from AGCs directly and indirectly at a level of: turnover £750m, GVA £398m, employment 7,254 (FTE).

7.3. In 2019, it is estimated that AGCs employed 4,227 fulltime equivalent jobs, created a turnover of £416m with a gross value added (GVA) of £216m.

7.4. The turnover, GVA employment and employee compensation contributed by AGCs have all increased significantly from 2015 to 2019.

7.5. The proportion of employees working full-time increased from 49 percent in 2017 to 59 percent in 2019.

7.6. The contribution of AGCs to the economy goes even further if one considers the support given to suppliers to the industry, as well as the demand supported when employees associated with the direct and indirect layers spend their earnings in the wider economy. The report shows the following:

7.8. For every £10 of turnover directly generated by firms operating AGCs, a further £8.04 worth of turnover is supported in the wider economy.

7.9. For every £10 of GVA directly generated by AGCs, a further £8.41 of GVA is supported in the wider economy.

7.10. For every 10 jobs directly generated by AGCs, a further 7.2 jobs are supported in the economy.

Source: Coinslot International - 12 March 2021

<https://www.coinslot.co.uk/2021/03/12/agc-contribution-uk-treasury-persuade-reopening/>

7.11. In the arcades sector, adult gaming centres totalled £97.0m in GGY (Period - April 2020 - September 2020).

Source: Gambling Commission - Industry Statistics - May 2021

<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/industry-statistics-may-2021>

7. Summary of AGC Planning Appeals

Executive Summary

- *'I see no reason why the proposed AGC should not contribute to the mix of retail and non-retail uses offered within the town centre.'*
- *'Leaving properties vacant for long periods is normally considered detrimental to the viability and vitality of the town centre.'*
- *'The proposed use would add to the variety of uses in the town centre... this proposal would strengthen and provide investment... four full time jobs would be created... I agree with the appellant's evidence that amusement centres can be part of their customer trips into the centre. Thus, the proposed use would contribute to the vitality and viability of the centre.'*
- *'It is contended that the proposed change of use (to AGC) would inadequately contribute to the maintenance and enhancement of this secondary shopping frontage vitality and viability. However, other than asserting that there will be such an adverse effect, no evidence has been put before me demonstrating that would be the case.'*
- *'I also bear in mind that the proposal would be open longer than the existing use, and would attract footfall in the evenings at night over a longer period of time than the current use. As such, it would make a greater contribution to the evening economy than the existing use.'*
- *'The retail market has changed significantly in recent years with the advent of internet shopping, and even in primary shopping areas there has been a move towards a greater variety of operators catering to different needs.'*
- *'There is little evidence therefore to suggest that this proposal would undermine the existing or future provision of shopping services in this location. Rather, the proposed change of use would return a vacant unit to use, would widen the range of uses as envisaged by policy 6 and would generate additional footfall and employment. In this context, the proposal would benefit the vitality and viability of the town centre.'*
- *'When these factors are taken together, in particular that the vacant unit would be brought back into use, the proposals would be complementary to the shopping environment as it would not undermine the vitality and viability of the centre.'*
- *'Although the proposed sui generis use would conflict with policy... in this particular case the benefits of the scheme would bring about justified decision not in accordance with the development plans.'*
- *'The proposed use would comply with the aims of this policy by supporting the vitality and viability of the town centre and bring a vacant unit back into use, facilitating a use which could add to the footfall and increase the opportunity for shared trips. It would also add to the evening economy being the use would open up to 24 hours and also subsequently increase employment opportunities.'*
- *'The proposal would generate footfall and gaming centre customers also tend to visit shops. In addition, the appellant sets out that the proposed use would create 7 full-time equivalent jobs, introduce a new use and investment in the premises and centre... the proposal would bring a vacant unit back into use with the potential for some linked trips, thereby complementing and helping to maintain the vitality and viability of the centre.'*

1. Future Leisure Limited v London Borough of Brent (Ref: APP/T5150/W/17/3189944 – 9 May 2018)

- This appeal relates to the proposed change of use from a pay day loan establishment to an AGC. The main issue being the effect of the proposal on the vitality and viability of Willesden Green town centre, with particular regard to safety, security and anti-social behaviour and crime.
- In particular in relation to the impact on children, Paragraph 17 states that: *"It would not be appropriate to reject a planning application for a legitimate form of use on the basis of an assumption that the premises would not be run in accord with the relevant statutory regulations".*
- In respect of social concerns about harmful effects and alleged links with gambling and in relation to vulnerable persons, the Inspector stated the following at Paragraphs 26, 29 and 30:
"Moreover, if such general social concerns about harmful effects and alleged links between gambling, alcohol abuse and mental health disorders were accepted as a sound basis for rejecting planning for such uses, it is unlikely that planning permission would be given for any betting shops or AGCs or indeed other types of premises, such as pawnbrokers/payday lenders, off-licences, public houses or takeaways."
"The proximity of facilities for vulnerable groups would not, of itself, justify withholding permission, given that the Council's DMP and relevant statute accepts AGCs as a legitimate form of planning use, albeit that they are also subject to a separate licensing and regulatory regimes".
"Moreover, vulnerable persons in the area would, whether the proposal was approved or not, still have access to betting shops, off-licences, public houses, pay-day lenders and pawnbrokers as they would in many high streets across London and the country".
- The Inspector when considering previous planning appeal decisions, confirmed in Paragraph 37 that, providing there was compliance with policies designed to prevent an over-concentration of AGCs, there was no reason why they should be considered to undermine the vitality and viability of town centres and:
"...Therefore, I see no reason why the proposed AGC should not contribute to the mix of retail and non-retail uses offered within the town centre".
- Some residents suggested that the property should remain vacant or utilised for an alternative use. The Inspector's response to this at Paragraph 39 stated:
"...leaving properties vacant for long periods is normally considered detrimental to the viability and vitality of town centres".
- Other matters raised included that the premises was in the Conservation Area. As there were to be no external alterations and that there could be a condition to retain a retail window display, it was determined that the change of use would not have an adverse effect on the character or appearance of the Conservation Area.

2. JWT Leisure v Blackpool Borough Council (Ref: APP/J2373/W/18/ 3196247 – 18 May 2018)

- This appeal relates to the proposed change of use from retail to an AGC. The main issue being the effect of the proposal on the vitality and viability of Blackpool Town Centre, with particular reference to its character and appearance.
- In respect of these issues, the Inspector confirmed at Paragraph 11 that: *"The proposed use would add to the variety of uses in the town centre, and in particular to the north-east of the PRC. By re-using the unit, the proposal would strengthen and provide investment, supporting the re-branding of the town centre. Four full-time jobs would be created. I note that the proposed use would consist mainly of low-stake and prize gaming machines for adults. Thus, it would be different to amusement arcades. I agree with the appellant's evidence that amusement centres can be part of their*

customer's trips into the centre. Thus, the proposed use would contribute to the vitality and viability of the centre".

- Specific to concerns expressed about the effect of the proposed use on the health and education of Blackpool's population, the Inspector stated at Paragraph 13 that: *"... there is little conclusive evidence that the proposal would, individually or collectively, result in harm to people's health and education, or prevent them from leading healthy lifestyles".*

3. Terry Farr v London Borough of Waltham Forest (Ref: APP/U5930/W/18/ 3193121 – 27 July 2018)

- This appeal relates to the proposed change of use from an estate agent's office to an AGC. The main issue being the effect of the use on the vitality and viability of Walthamstow town centre.
- Expressly in relation to the vitality and viability of the secondary shopping frontage, the Inspector found at Paragraph 8: *"It is contended that the proposed change of use would inadequately contribute to the maintenance and enhancement of this secondary shopping frontage's vitality and viability. However, other than asserting that there would be such an adverse effect no evidence has been put before me demonstrating that would be the case".*
- In addition, although the marketing evidence produced by the appellant was limited, considerable weight was attached to it. The reason being that it has come from an agent that could reasonably be expected to have very good knowledge of the market for commercial premises in Hoe Street, as the agent's office was a few doors from the property.
- The Inspector on the evidence available to him, states at Paragraph 12 that: *"I conclude that the use would not adversely affect the vitality and viability of Walthamstow town centre. I therefore consider that there would be no conflict with Policy DM25 of the Local Plan because: the use would not result in an increase in the number of non-Class A1 premises in the secondary frontage; the available evidence suggests that there is little prospect of a Class A1 user seeking to reoccupy the premises; and there would not be an undue concentration of adult gaming centres in the affected part of Hoe Street".*
- Other matters raised included that the use could have implications for crime and disorder or contribute to gambling addiction. The Inspector at Paragraph 13 confirmed that: *"Those are matters that are addressed by 'other legislation' and are therefore not for my consideration in determining this appeal".*

4. GT Promotions Ltd v London Borough of Lewisham (Ref: APP/C5690/W/ 17/3191347 – 28 August 2018)

- This appeal relates to the proposed change of use from a 'pay day loans' establishment to an AGC. The main issue in this appeal is the effect of the proposal on the vitality and viability of Lewisham town centre.
- In terms of background, it was confirmed that there were several adult gaming centres and betting offices on nearby streets. However, the Inspector found that due to total number of units and the presence of intervening uses, gambling facilities did not dominate the centre as a whole. Nor would the addition of one such use result in a cluster or concentration of such uses (Paragraph 7)
- Specific to levels of footfall and contribution to the economy, The Inspector found at Paragraph 11: *"the loss of footfall associated with those uses would not occur. I also bear in mind that the proposal would be open longer than the existing use and would attract footfall in the evenings and at night,*

over a longer period of time than the current use. As such it would make a greater contribution to the evening economy than the existing use”.

- In respect of the property being a non-retail development, within the primary shopping frontage, the Inspector at Paragraph 13 confirmed that: *“there is no evidence to suggest that the proposed change of use would harm the amenity of adjoining properties”*. In the same paragraph it also confirmed that the potential noise from around the clock use could be addressed by way of a condition.
- In relation to the shop frontage, the Inspector found that in comparison to the existing ‘pay day loan’ frontage that: *“The design of the shop front itself is broadly consistent with those of surrounding units. I consider that the proposal is likely to result in a more active window display than is there at present. However, in the absence of an existing window display it would not be appropriate, in the specific circumstances of this case, to require a display window selling retail goods by condition”* (Paragraph 15).
- In summary in relation to these points the Inspector concluded at Paragraph 16 that: *“given the existing and proposed use, I am satisfied that the development would not result in the loss of a retail unit, active frontage or a retail display. Neither would it result in the dilution of the retail offering or the weakening of the shopping strength, vitality or interest of the area. Furthermore, it would contribute to the evening economy. Consequently, I consider that the proposal would not have a materially harmful effect on the vitality and viability of the town centre and policy LTC16 is satisfied”*.
- Other matters raised related to concerns regarding the social and public health issues arising from ‘problem’ and ‘at risk’ gamblers. The Inspector confirmed at Paragraph 21 that: *“it would not be appropriate to reject a planning application for a legitimate form of use on the basis of an assumption that the premises would not be run in accord with the relevant statutory regulations”*.

5. Michelle Jones (Kerching Amusements) v Broxtowe Borough Council (Ref: APP/J3015/W/18/3212670 - 9 April 2019)

- This appeal relates to the proposed change of use from a vacant shop unit (within the designated primary shopping frontage) to an AGC. The main issue in this appeal being the effect of the proposal on the vitality and viability of Eastwood Town Centre.
- The Inspector in considering this issue noted at Paragraph 10 that: *“The retail market has changed significantly in recent years with the advent of internet shopping and, even in primary shopping areas, there has been a move toward a greater variety of operators catering to different needs. Indeed, I note the comments of the Council’s Town Centre & Regeneration Officer which refer to the ‘evolving’ role of the town centre with a ‘long-term structural shift away from retail dominated provision to services of all types, but especially leisure (e.g. bars, cafés, entertainment) and a continued rationalisation of non-sustainable retail spaces.”*
- The Inspector also noted that the vacancy rate within the primary frontage was 14 units out of 95, or 14.7%. Suggesting that demand for vacant premises was not outstripping demand. The Inspector stated at Paragraph 13: *“There is little evidence, therefore, to suggest that this proposal would undermine the existing or future provision of shopping services in this location. Rather, the proposed change of use would return a vacant unit to use, would widen the range of uses as envisioned by Policy 6 and would generate additional footfall and employment. In this context, the proposal would benefit the vitality and viability of the town centre”*.
- Other matters raised concerns in relation to the potential adverse social impacts of an adult gaming centre. The Inspector was satisfied that the business would be strictly controlled by the

requirements of the Gambling Commission and there is nothing to suggest that these requirements would or could not be adhered to.

- Potential disturbance as a result of the noise from the gaming machines was raised as a concern. It was indicated to the Inspector that the machines are volume adjustable and so he was satisfied that a condition restricting noise from being audible beyond the boundaries of the premises would be sufficient to prevent harm to adjacent occupants.

6. Luxury Leisure v Hull City Council (Ref: APP/V2004/W/19/3233244 – 22 October 2019)

- This appeal relates to the proposed change of use from an A1 Shop (Retail) to an AGC. The main issue in the appeal is the effect of the proposal on the vitality and viability of the Holderness Road District Centre.
- The appeal site was located within a defined District Centre on Primary Frontage where the Council restricted non-A1 uses to no more than 30%. The proposals involved a change of use from A1 to AGC, which would have been in conflict with this threshold and hence was refused permission by the Council.
- The Inspector noted at Paragraph 14 that the appeal property had been vacant for over 2 years, which would mean that it would continue to depreciate from the viability and vitality of the centre even though the overall vacancy rate was low – the Inspector confirmed that this attracted significant weight in their decision.
- The Inspector recognised at Paragraph 15 that the appeal site's close location to other shops and services would result in potential for linked trips and associated footfall. In addition, there would be minor benefits for employment and the evening economy with the proposed 24/7 trading. The decision stated: *"The site's location close to the other shops and services would result in the potential for linked trips and associated footfall. There would be minor benefits with the envisaged employment levels, to the evening economy with the proposed opening hours and with regard to providing natural surveillance, along with the existing gaming centres and other evening uses".*
- At Paragraph 16 the Inspector recognised 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".*
- The Inspector concluded in relation to vitality and viability of the centre at Paragraph 17 that: *"When these factors are taken together, in particular that the vacant unit would be brought back into use, the proposals would be complimentary to the shopping environment as it would not undermine the vitality and viability of the centre. Likewise, when the indicators in the PPG are considered, the proposal would not detract from the health of the centre. It would maintain the diversity of uses and it would lower the proportion of vacancies. Nor would it diminish from customers' experience and behaviours of the centre, as it would be a complimentary use that would not be unexpected in such a location and allow the potential for linked trips."*
- In relation to the proposed 24hr operation, the Inspector concluded at Paragraph 22 that: *"...In relation to the proposed opening hours, the application submission indicates it would be in 24 hour operation on all days of the week. This is not unacceptable with its District centre location. Thus, a restriction of the opening hours would also not be reasonable and necessary."*
- Other matters raised related measures which concerned security and social responsibility. The Inspector stated at Paragraph 20 that: *"Although I am aware of the concerns that can be expressed because of the nature of the use, these largely lie outside of what I can consider".*

7. Majid Morabbi v Derbyshire Dales District Council (Ref: APP/P1045/W/19/3228235 - 20 December 2019)

- This appeal relates to the proposed change of use from a single storey public convenience to an AGC. The main issues in this appeal were, firstly, whether the proposal would result in unacceptable effects on the residential amenity of neighbouring occupants. Secondly, the suggestion that the proposal would give rise to noise and disturbance and potential anti-social behaviour.
- There is a large public house with a large external area facing the premises. The Inspector, therefore, found at Paragraph 10 that: "...it is my opinion that any noise and disturbance to nearby residents as a result of the proposal is likely to be negligible given this established nearby use which reinforces the busy town centre character of the area".
- Conditions were applied in restricting the hours of the proposed premises and prohibiting any amplified music. This led the Inspector at Paragraph 12: *"to the view that the proposed development, subject to conditions, would not cause any noise and disturbance of a degree sufficient to result in unacceptable harm to the living conditions of the occupants of adjacent residential properties. For these reasons, I find no conflict with Policies S3 and PD1 of the Adopted Derbyshire Dales Local Plan 2017 which, amongst other things, seeks to ensure that development achieves a satisfactory relationship to adjacent development and does not cause unacceptable effects by reason of noise or other adverse impacts on local character and amenity"*.
- Other matters raised included that the premises was in the Conservation Area, but this was dismissed, as there was to be no physical alterations to the appearance of the appeal property.
- Objections were also received on moral grounds, on the proximity to a school with the inference that young people would be attracted to the premises. The Inspector stated at para 15: *"These are not planning matters for my consideration as national and local planning policies do not proscribe such uses. Rather, the government seeks to regulate such activities by other statutory means predominantly via the licencing regime"*.

8. Luxury Leisure v London Borough of Croydon (Ref: APP/L5240/W/19/3232831 - 13 January 2020)

- The main issues in this appeal relate, firstly, to the effect of the development on the vitality and viability of the Thornton Heath district shopping centre. Secondly, to the effect of the proposed shop front alterations on the character and appearance of the host property and the surrounding area.
- The premises had been vacant for some time and the condition of the premises had a detrimental effect on the character and appearance of the area. The Inspector, therefore, found that the proposal would result in a significant improvement to the contribution the premises would make to the character and appearance of the area. In addition there would also be job creation and overall it would contribute to the vitality and viability of the area. Para 10 states: *"The development would, therefore, result in a significant improvement to the contribution this premises makes to the character and appearance of the area. In view of the period of time this premises has remained in its current condition, I view this as a benefit of the scheme, along with the creation of jobs. These matters would contribute to the vitality and viability of the Thornton Heath shopping centre"*. Further, in Paragraph 13 it states: *"...despite being marketed during the regeneration period, the proposed use would not jeopardise the positive momentum of the centre's regeneration..."*. In addition, at Paragraph 15, it states: *"Although the proposed sui generis use would conflict with Policy DM4.2 of the CLP, in this particular case the benefits that the scheme would bring about justify a decision not in accordance with the development plan"*.

- Specific to character and appearance, there was concern in relation to the illumination of the yellow door surround and the effect that it would have on the nearby Thornton Heath Clock Tower. The Inspector agreed to allow a condition that limited the level of illumination, allowing this door feature to be more subdued. On this basis, the Inspector confirmed at Paragraph 35: *"...the development would have an acceptable effect on the character and appearance of the host property and the surrounding area, in compliance with Policy DM11 (Shop Front Design and Security) of the CLP, which requires the design of new shop fronts to respect the scale, character, materials and features of the buildings of which they form part"*.
- Other matters raised related to those under the age of 18, sale of alcohol and stakes on machines. The Inspector stated: *"Many of the concerns raised are more relevant, and better dealt with, under the licencing regime"*.

9. Praesepe Holdings Ltd v Doncaster Metropolitan Borough Council (Ref:APP/F4410/W/20/3250246 - 14 August 2020)

- This appeal relates to the proposed change of use from a vacant shop unit to an AGC. The main issues in this appeal relate, firstly, to the effect of the proposal on the vitality and viability of the Doncaster town centre and primary shopping frontage. Secondly, the effect of the proposal on the health and wellbeing of residents living in the Town Ward of Doncaster.
- The property had been vacant since October 2018 and although highlighted as primary shopping frontage the Inspector found there was already broadly a 50/50 split between retail and non-retail uses. As such, the Inspector states at Paragraph 11: *"The use proposed would comply with the aims of this policy by supporting the vitality and viability of the town centre and bring a vacant unit back into use, facilitating a use which could add to the footfall and increase the opportunity for shared trips. It would also add to the evening economy being a use that would be open up to 24 hours, and also subsequently increase employment opportunities"*.
- The council considered that the property was in a deprived area and the Ward has an over representation of residents susceptible to problem gambling. The Inspector cited the 'Gambling: An Evidence Briefing Paper for Doncaster' report that accepts that there is a lack of robust evidence concerning problem gambling. In addition he confirmed that the report does not correlate that the proximity of a gambling establishment within a close proximity to residents' results in additional problem gambling.
- In response to this the Inspector at Paragraph 16 states that he did: *"...not agree therefore that the argument presented can be given significant weight, or that there is a clear link between the proposed use of the site and the concerns the Council identify"*. At Paragraph 13, he goes on to state: *"I do not consider therefore that the proposal would adversely affect the health and wellbeing of residents in the Town Ward of Doncaster. I do not consider therefore that this would lead to a conflict with either the Framework or the Emerging Local Plan policy 51"*.
- Other matters raised included that the premises was in the Conservation Area. As there were no changes were proposed to the external façade of the building and a shop window display was confirmed to be retained; the Inspector at Paragraph 18 considered *"the duty to preserve the Conservation Area would be achieved"*.

10. East Kent Leasing Ltd v Luton Council (Ref: APP/B0230/W/20/3256275 – 29 December 2020)

- This appeal relates to the change of use from betting office to AGC. The main issues in this appeal relate to the effect of the proposed development upon the vitality and viability of Luton town centre.
- The Inspector confirmed at Paragraph 6 that: *“Amusement centres and betting shops, for that matter, are an established part of high streets and shopping centres and complement their retail function”*.
- The inspector considered a number of elements, including linked visits to amusement centres with shopping trips or work, the age restrictions in place at an AGC, whether security should be provided, and whether that the town centre is at a critical stage of its regeneration. In relation to these points, the Inspector concluded at Paragraph 12: *“As such, the proposed development would not undermine the vitality and viability of Luton town centre. As such it would accord with Policies LLP1, LLP3 and LLP25 of the Luton Local Plan (2016) which, amongst other things, require all new development to preserve or improve the character of the area; town centre proposals to contribute towards job creation, contribute to the achievement of a mixed area which is vibrant and active and enhance the distinctiveness and character of the area by responding positively to townscape”*.
- Further in Paragraph 13 the Inspector confirmed that the proposals did accord with the NPPF: *“Paragraphs 85 and 127 (of the NPPF), which amongst other things, seek to promote the growth and diversification of town centres to allow them to grow and diversify in a way that can respond to rapid change in the retail and leisure industries and allows a suitable mix of uses, and create places where crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion”*.
- When considering the Council’s suggestion to limiting opening hours by conditioning them; the Inspector instead confirmed at Paragraph 17 that: *“... the nature of the use is unlikely to result in undue noise and disturbance from comings and goings and given its town centre location and the presence of late night and 24 hour uses in the area I do not consider it necessary to limit the opening hours”*.

11. Future Leisure Ltd v Westminster City Council (Ref: APP/X5990/W/ 21/3271781 – 09 November 2021)

- This appeal relates to the proposed change of use from a ‘betting shop’ to an AGC. The main issues in this appeal relate to the effect of the development on the character, function and vitality and viability of the Queensway/Westbourne Grove Major Centre.
- The Council indicated that the development was unlikely to generate footfall and would not compliment the centres retail function. However, the inspector accepted the evidence before him that (Paragraph 12) *“...the proposal would generate footfall and that gaming centre customers also tend to visit shops. In addition, the appellant sets out that the proposed use would create 7 full time equivalent jobs, introduce a new use and investment in the premises and the centre”*. The Inspector thereby concluded that: *“the proposal would bring a vacant unit back into use with the potential for some linked trips, thereby complementing and helping to maintain the vitality and viability of the Centre”*.
- Specific to vulnerable persons being attracted to a gaming centre the Inspector at Paragraph 14 confirmed that: *“Risks to problem gamblers and other vulnerable persons would be more directly relevant to the appropriate licensing and regulatory functions..... Furthermore, there is little evidence to support the view that quality of life and community cohesion would be detrimentally impacted by the proposed use”*.

- Concerns about the effect of the development on the living environment for local residents and the effect of the development on measures undertaken to improve the public realm were considered. The Inspector found at para: 16 that: *“there is limited evidence that the living conditions of nearby residents or others staying in the area would be harmed because of the development. Nor has it been shown that the development would be detrimental to the recent public realm improvements”*.
- In justifying her decision for allowing the appeal, the Inspector concluded at Paragraph 17 that: *“Overall, I am satisfied that the proposal would not detract from the character, function or vitality and viability of the Queensway/Westbourne Grove Major Centre. The development would comply with the requirements of Policies 7, 14 and 16 of the WCP in so far as these policies seek to protect living conditions of residents, maintain the vitality and viability of town centres and ensure that entertainment uses are of a type and size appropriate to their location. It would also accord with the Framework where it takes a positive approach to the growth, management, and adaptation of town centres”*.
- Other matters raised included that the premises was in the Conservation Area. The Inspector found at Paragraph 20 that: *“The building is part of relatively complete mid-Victorian terrace in yellow stock brick which is characteristic of the local area. The proposal would bring an existing vacant unit back into use without external alterations to the building. The maintenance of a window display may be sought by condition. Overall, in the context of the street scene, the character of the conservation area would be preserved”*.

8. Summary

8.1. Adult Gaming Centres do not result in undue noise and disturbance from customers, and operate on high streets alongside other daytime and night time facilities.

8.2. AGCs add to the vibrancy and vitality of the High Street, by complementing other uses with their customers using other facilities at the same time as visiting an AGC.

8.3. The applicant has committed to a lease at the premises, which will bring stability to the use of this particular site, and will create up to 10 new jobs.

8.4. The investment in the site will add to the amenity of the area.

8.5. There are no social risks connected to this application whilst there are economic and environmental benefits.

8.6. The National Planning Policy Framework recognises the requirements of different forms of businesses and economic development, and AGCs are included in the definition of 'main town centre uses.'

8.7. There is no over-proliferation of AGCs in this area, and the number is consistent with a high street of this nature.

8.8. This application would bring back to use a vacant unit which the area and other units in the locality would benefit from.

8.9. There will be a positive effect on the vitality and viability of the area.

8.10. There will not be an overprovision of Adult Gaming Centres, and if this application is granted, the number will not be excessive.