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Planning – Development Control
Camden Council
Camden Town Hall Extension
Argyle Street
London
WC1H 8ND

Dear Sirs,

Proposed change of use from Class A1 (retail) to Class A2 (financial and professional service) use at 148 Southampton Row, London, WC1B 5AG

We act as planning consultants to Ladbroke's Plc.

Messrs Ladbroke's wish to occupy the above premises as a new licenced betting office. This new betting office facility will include all of the accoutrements associated with a modern betting office and full access and facilities for the less able.

With regard to policy, the Camden Core Strategy and Development Policies LDF documents are adopted as of 8 November 2010. These documents therefore represent the statutory development plan in force.

The subject site is located outside any defined shopping centre but is within the 'Central London Area' and also within a 'Growth Area'. Policy CS7 of the Core Strategy deals with 'Camden's Centres and Shops'. The first part of the policy highlights the Council's wish to promote in the range of 20-30,000 square metres additional retail at Euston and Camden Town, with the majority expected to take place at Euston. The second part of Policy CS7 deals generally with the protection of centres for shopping. Policy CS7 states that it will support the provision of –

Limited provision of small shops outside centres to meet local needs

Policy DP10 in the adopted Camden Development Policies document then sets out in greater detail, the approach to change of use proposal outside defined shopping centres. The first part of Policy DP10 deals with new developments. The second part of the policy states that -

The Council will seek to protect shops outside centres by only granting planning permission for development that involves a net loss of shop floorspace outside designated centres provided that:

- d) alternative provision is available within 5-10 minutes' walking distance;**
- e) there is clear evidence that the current use is not viable; and**
- f) within the Central London Area, the development positively contributes to local character, function, viability and amenity.**

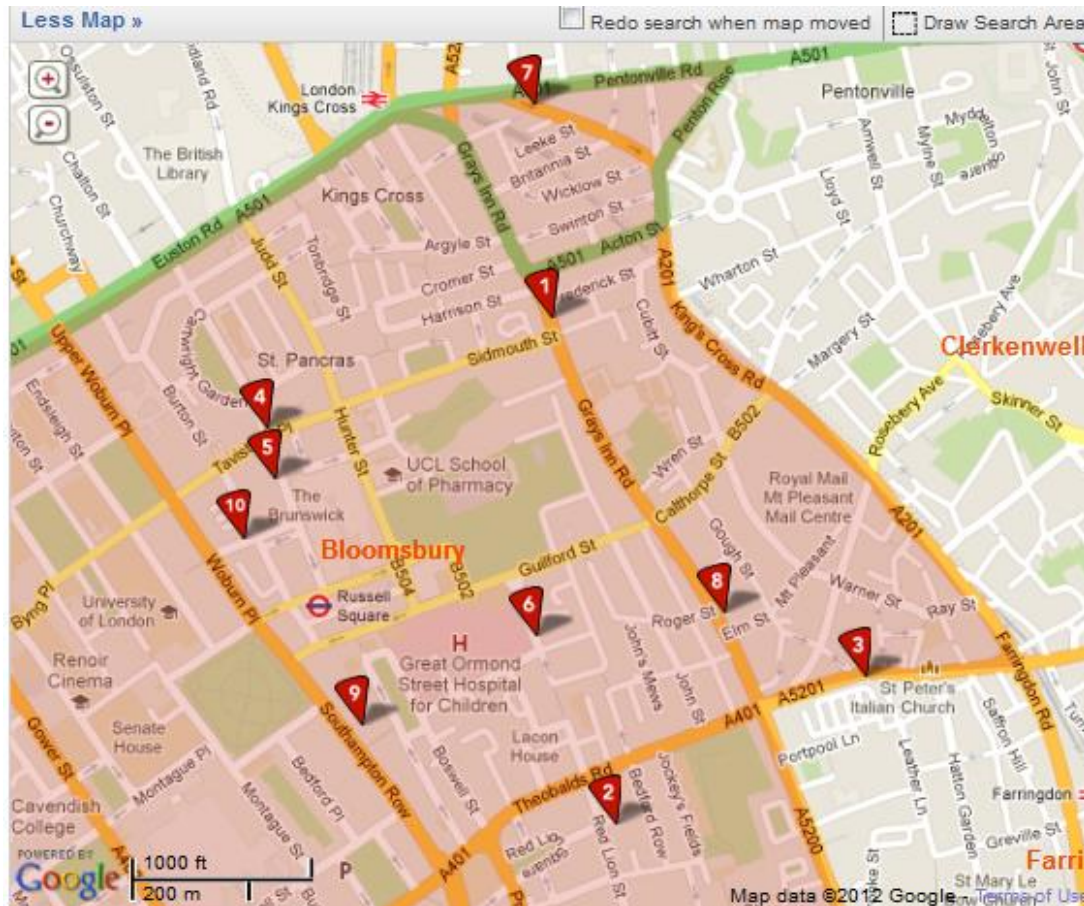
Supporting paragraph 10.7 explains that –

The Council wishes to retain local shops outside centres where possible, including those on small shopping parades. Therefore, we will resist the loss of shops (Use Class A1) unless there is alternative provision within 5-10 minutes walk (approximately 400-800 metres), depending on the scale of provision. We will also take into account the viability of the premises for the existing use, in particular any history of vacancy in a shop unit and the prospect of achieving an alternative occupier. However, we recognise that, as the number of people shopping locally has declined, it is unlikely that all shops outside centres will continue to find an occupier.

In compliance with policy we have surveyed all of the uses on Russell Square/Southampton Row down to its junction with Bloomsbury Way. There are a variety of uses here including hotels restaurants, souvenir shops, and convenience stores such as a Tesco, green grocers, a hair salon and two pharmacies'. There are other dry cleaners in the area within easy walking distance of the site as shown on the map below –

1. Alex's 2 Hour Dry Cleaners
2. Princeton Dry Cleaners
3. Diana's Dry Cleaner
4. Red and White Laundries
5. Bloomsbury Cleaners
6. Denner Dry Cleaners (Subject Site)

7. Ariana
8. Valet Dry Cleaning
- 9. Capri Exclusive Dry Cleaners**
10. Smart Line Dry Cleaners



We also enclose a letter from Mr Neil Davies of CBRE which confirms that the property has been marketed at a passing rent of £42,000pa both locally and nationally since July 2012. A board has been erected on-site throughout this period as well as the site having been marketed online and with targeted mail shots. Despite all of this, the only serious interest in the site has been from Class A2 occupiers. A copy of the marketing particulars is also enclosed.

A modern betting office of the type proposed is one of the most vibrant of all Class A2 uses and represents a valued leisure activity. Typically a betting office will attract high visitation rates with far more customers than a shop of similar size. In addition, at least 70% of customers will have already or will go on to make other purchases in the locality thereby creating spin-off trade. With the exception of Christmas Day, betting offices trade from 08.00 at the earliest to 22.00 at the latest. Since 1994, with the changes in betting and gaming legislation, betting offices are no longer closed in the sense that you can see into or out of them. They employ maximum use

of glazing and have 'active frontages'. Betting offices are therefore bright and busy and represent a picture of activity in the street scene. In this way they contribute to the vitality of the area in the most positive manner

We should also add that the trading characteristics of betting offices are such that there are minimal environmental impacts associated with betting office use. Betting offices are essentially highly localised walk-to-uses. They require no servicing and therefore the vehicular traffic generation related with this use is often less than that of a normal shop. There is also ample car parking provision nearby which serves this parade of shops. Environmental noise breakout is also kept to a minimum. As standard all new Ladbrokes betting offices are sound proofed to ensure there is no adverse impact on the amenity of nearby occupiers. This includes acoustic ceilings and self-closing doors.

Please note, the change of use of this unit will bring added vitality and footfall to the frontage, while the associated alterations and investment Ladbrokes intend to make in the property will ensure the long term viability of the unit as well. Ladbrokes will also create approximately 6 jobs such that the aims and objectives of national planning guidance are met. We therefore commend these applications to you for your approval.

Please note this application is to establish the principal of change of use only. Applications for alterations to the shopfront and signage will follow later under separate cover and will be accompanied by a Design and Access Statement.

If you have any queries relating to this proposal please do not hesitate to contact these offices in the first instance.

Yours sincerely,

HARIS KASUJI