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Development Control  
London Borough of Camden  
Camden Town Hall  
Argyle Street  
London  
WC1H 8ND



Dear Sirs,

**Proposed Change of Use from Vacant A1 (Retail) to A2 Betting Office  
Use at 9 Goodge Street, London W1**

We act as planning consultants to Ladbrokes Plc. Messrs Ladbrokes currently operate basement betting office premises at 23A Goodge Street. Ladbrokes cannot provide disabled access facilities from these premises and therefore wish to relocate to the above vacant premises. The proposed relocation will enable the company to provide to provide all the accoutrements associated with a modern betting office facility including ample viewing, seating and circulation space, separate staff and customer WC facilities and full access and facilities for the less able. This relocation will enable the company to provide a service to local customers which is fully compliant with Disability and Discrimination Act legislation.

With regard to policy we note that Nos. 1-53 (south side) and 2-50 (north side) are designated as within the defined Neighbourhood Centre. Policy R7 of the Replacement Camden Plan deals with 'Protection of Shops, Services and Food and Drink Uses'. Part A of this policy deals with Central London Frontages, Town Centres and Kings Cross and therefore does not apply to Goodge Street. Part B of Policy R7 deals specifically with Neighbourhood Centres and states as follows –

**At ground floor level in the Neighbourhood Centres, the Council:**

- a) will only grant planning permission for development that it considers will not cause harm to the character, function, vitality and viability of the centre; and
- b) will not grant planning permission for development that would prevent the centre from being capable of providing a range of convenience shopping.

The minutiae dealing with the interpretation of this policy are contained within supplementary planning guidance document, 'Camden Planning Guidance 2006' which stipulates that in Neighbourhood Centres the following applies –

*The Council will generally resist proposals that would result in:*

- *Less than 50% of frontages in being in retail use; and*
- *More than 3 consecutive units in non-retail use.*

Paragraph 46.11 of the Camden Guidance explains that -

*Frontages are considered to be a run of premises in shopping and other town centre uses. A frontage will start at a road junction or, where there are ground floor residential premises in the run, at the beginning of the first two consecutive non-residential uses at ground floor level. Frontages may continue around corners, or across entrances to premises above or to the rear, and may include isolated ground floor residential uses, but are ended by roadways that interrupt the run of premises*

We have informally discussed the interpretation of Policy R7 with Ms Emma Fenton in the forward Plans Team. She informs that the Council consider individual planning units when assessing change of use proposals. Therefore each individual use is scored as one. However, where there are double or triple fronted units then this is noted as an observation to be included within the development control decision making assessment. We therefore surveyed the Goodge Street Neighbourhood Centre on this basis.

The Goodge Street Centre is a small local centre with a triple fronted Tesco anchoring the other retail uses in the vicinity. The subject frontage for the purposes of Policy R7 is identified as from Nos. 1-17 Goodge Street. The layout of the frontage is as follows –

TOTTENHAM COURT ROAD		
No 63 (TCR)	Pret A Manger (Not in Defined Neighbourhood Centre)	
No 1-3 (Goodge Street)	Samurai Sushi	A3
No. 5-7	Subway Sandwich	A1
<b>No. 9 (Subject Unit)</b>	<b>Vacant Prime Time DVD</b>	<b>A1</b>
	Sta Travel	A1
	The Flower Shop	A1
No.15-17	Spaghetti House Restaurant	A3
WHITFIELD ROAD		

As you can see there are at present only two non-retail uses out of 6 planning units such that in policy terms one more non-retail use could be accommodated here following which you can apply restrictive development control policies with confidence. The subject premises will also be flanked by retail uses to either side such that there will be no concentration of non retail uses hereabouts. We believe that our assessment is corroborated also by the Councils own most recent 2007 Retail Monitoring Survey produced by the Forward Plans Team

This application is for the only ground floor A2 use in the Goodge Street Centre such that the subject will add diversity to the street scene and also make good use of vacant premises. We should also add that this proposal is a relocation of an already existing use and not an introduction of an altogether new non-retail activity. It will however produce a much improved betting office use and in this way enhance the range of uses on offer. Within the defined Goodge Street Centre as a whole there are 43 commercial premises of which only 9 or 20.9% are currently in non retail uses such that even with this relocation proposal in place there will still be ample A1 retail provision in this centre catering for the day-to-day needs of the local community.

Modern betting offices are of course one of the most vibrant of all Class A2 uses and represent a valued leisure activity. Typically a modern betting office of the type proposed 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. Nowadays betting offices open until 10.00pm at the latest in the summer months and they also trade on Sundays. In this way they bring trade to an area outside normal shopping hours. 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 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.

Please note at this stage we are merely applying for the principle of change of use. Proposals for shopfront alterations and Advertisement Consent will be applied for under separate cover and will be supported by a Design & Access Statement.

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

Yours sincerely,



**HARIS KASUJI**

c.c. Mark Stephens – Ladbrokes Plc.