

Mr Aziz
12 Bradwell House
London
NW6 5NL

The Planning Inspectorate
Room 3/19 Eagle,
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

10/2/16

REF: PINS Reference: APP/X5210/W/15/3140916 **Appeal ref: 2015/1549/P**

As a local resident I am aware of the notification of an appeal in relation to 64 Kilburn High Road, and chiefly the appeal for the grounds of use of ground floor from retail unit (Class A1) to a betting shop (Sui Generis). I write to comment on this application and that it should be roundly rejected on the grounds of:

HOMELESS HOSTEL LOCATED NEARBY

There is a homeless hostel Conway House (20-22 Quex Rd, London NW6 4PG) located a 2 minute walk away. Having spoken to my local Councillor it is my understanding that they have not been **FULLY** consulted on the proposed betting shop (A consultation was allegedly done). With many vulnerable people living there a betting shop would create greater availability of fixed odd terminals which can attract addicts and those who are dispossessed such as the homeless who often do not have the capacity to gamble responsibly. The 2010 British Gambling Prevalence Survey found losses from problem gamblers on FOBT's exceeded losses on several leading gambling activities combined. Having such an establishment so close by to a homeless hostel will only exacerbate the situation.

SATURATION

There are already 8 betting shops on the high road, and there are **more than 22 betting, fixed odds gaming machines, and cash loan shops on the High Road already**. Kilburn High Road is heavily saturated by this type of business. Paddy Power ALREADY has a site on the High Road, only a short walk of 5-6 minutes away from their proposed new site.

LOSS OF RETAIL SPACE

Given the saturation of such establishments, the council should strongly consider preserving retail units in an area that is already saturated with non-retail units. Their presence lessens the attractiveness of its retail offer to shoppers, resulting in the loss of a retail unit in a prime location. Adding a **9TH** betting shop will only detract from creating a vibrant high street for friends and family to eat shop and drink

LACK OF CONTRIBUTION TO LOCAL COMMUNITY AND ECONOMY

Creating footfall and 5 (low paid) jobs are not sufficient enough reasons to give such permission for a change of use of facility. A betting shop does little to help the local community or economy.

At a time when public resources are stretched such establishments are a financial drain. For example **crime** in betting shops far exceeds crime in other venues with 1.25 **police** call outs per betting shop last year compared to just 0.12 to bingo halls and 0.19 to adult gaming centres.

Given that a Paddy Power betting shop will need access to local public services such as the police one has to question their highly questionable taxation arrangements. They are fully operational and active in the UK whilst being 'based' in a lower tax regime of Ireland. Their online activities take place in the Isle of Man where they pay Zero Corporation Tax. Such tax-avoidance activity reduces the government tax take and has a direct impact on the amount of money available to local councils such as Camden for things such as **policing – the very thing betting shops require heavily on.**

FOOTFALL

Paddy Power have stated that their establishment would create footfall. Yes footfall right outside a Marks & Spencer and Boots - two shops frequented by residents the former by families for their weekly shop, and the latter by young children e.g. teenage girls buying make-up. People would be **congregating and 'hanging around'** outside the premises as they always do with betting shops. Is this really what Kilburn High Road wants or needs? I for one think not.

I write as a layman and as a concerned local resident, please reject this appeal as it is unwanted by local residents and would have a detrimental effect on the High Road for the reasons listed above. It will not **develop** the High Road further – it will only seek to **decay** it.

Yours faithfully,

Mr D. I. Aziz