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L210813 Coventry St CoU Cover Letter



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**SUBMITTED VIA THE PLANNING PORTAL - PP-10122403**

Dear Sir or Madam

**SECTION 62 OF TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)  
CHANGE OF USE FROM A 'BETTING SHOP' (SUI GENERIS) TO A 'CASINO AND ADULT GAMING  
CENTRE' (SUI GENERIS)  
262 TOTTENHAM COURT ROAD, LONDON, W1T 7RG  
GROSVENOR CASINOS LTD**

### Introduction

We write on behalf of our client, Grosvenor Casinos Ltd, to apply for planning permission for the change of use of the premises at 262 Tottenham Court Road from a 'Betting Shop' (Sui Generis) to a 'Casino and Adult Gaming Centre' (Sui Generis).

The proposed development will facilitate an extension to the existing and adjacent Grosvenor 'St Giles' Casino (also at 262 Tottenham Court Road).

In accordance with the Town and Country Planning (Development Management Procedure) Order 2015 (as amended), we confirm the following documents comprise the application:

- This covering letter;
- The completed application form and certificates;
- The completed CIL form;
- Drawing Ref: 262TCR/SLP/2021'; and
- Drawing Ref: 2093.03 - 'Proposed Ground Floor Plan Option 2A';
- Drawing Ref: 2093.01 – 'Existing Ground Floor Plan'.

The application has been submitted electronically via the Planning Portal (Ref: PP-10122403). The relevant planning application fee of £462.00 has also been made using the online payment system.

### The Application Site

The application site comprises the ground floor commercial premises at 262 Tottenham Court Road in London (the 'Site'). The premises measures approximately 71 sq. m (GIA).

The Site is identified by the red line on Drawing Ref: 262TCR/SLP/2021'.

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The premises currently operates as a 'Betting Shop' (Sui Generis) and is currently occupied by Coral. We understand that the current operation is due to cease imminently which would create a vacancy within the commercial frontage.

The Site has excellent accessibility due to its proximity to Tottenham Court Road underground stations as well as a number of key bus routes. It has a PTAL Rating of 6b (the highest rating).

### **The Proposed Development**

The application seeks planning permission for the change of use of the Site from a 'Betting Shop' (Sui Generis) to a 'Casino and Adult Gaming Centre' (Sui Generis).

As set out above, the Site is directly adjacent to the premises occupied by the Grosvenor 'St Giles' Casino. The proposed development will facilitate an extension to the existing 'casino' and facilitate a larger ground floor entrance on Tottenham Court Road. The enlarged entrance will provide a greater presence, more appropriate for the scale of the established casino, as well as improving customer accessibility and operations at the site.

In addition to the creation of a new enlarged and refurbished arrival lobby, part of the floorspace will be used as an adult gaming centre in line with the wider casino uses.

The proposed extension of the existing casino will facilitate the successful re-occupation of the premises at the Site. It will avoid a prospective vacancy which would have a detrimental impact on vitality and viability. The proposed development will ensure that the premises continues to contribute positively to the overall attraction of the surrounding area.

The application seeks provision for the premises to be operated in line with the existing hours of the Grosvenor 'St Giles' Casino which is 24 hours a day, seven days a week.

The proposed arrangement of the floorspace at the Site is illustrated on Drawing Ref: 2093.03 - 'Proposed Ground Floor Plan Option 2A'.

Any new signage will be subject to a separate application for advertisement consent as may be necessary.

### **Assessment of the Proposed Development**

The statutory development plan for the site consists of the following documents:

- Camden Local Plan (the '**Local Plan**') (adopted July 2017); and
- London Plan (adopted April 2021).

Below we assess the proposed development against the relevant local policies that comprise the development plan and the national planning policies contained within the National Planning Policy Framework ('**NPPF**'), which is a material consideration.

#### **Land Use**

As illustrated on the adopted Policies Map, the Site is located within the 'Central London Frontage' and more specifically the 'Primary Shopping Frontage'.

Policy TC2 (Camden's Centres and Other Shopping Areas) of the Local Plan states that the Council will promote successful and vibrant centres through locating entertainment uses and other town centre uses within the Central London Frontages.

The proposed entertainment use is entirely appropriate given the location and designation of the Site. The use will contribute directly towards the visitor, evening and night time economy and the overall attraction of the frontage and wider centre.

The existing use of the premises as a 'betting shop' (also a 'Sui Generis' classification) means that the proposed development will not have any impact on the retail function of the defined frontage or wider centre. It follows that there will be no harm or conflict with Policy TC2 (f).

As such, the proposed use of the premises accords with the strategic objectives of the Local Plan and Policy TC2. The works will ensure the successful re-occupation of a prominent unit removing the potential for vacancy and breaks in the commercial operations of the frontage.

The proposed development will be an extension to an existing and well established entertainment use. The scale of the floorspace at the Site (71 sq. m) means that the extension can only be classed as *de minimis*. The additional floorspace will not change the overall scale, role or function of the existing casino operation and therefore there is no risk of any unacceptable additional impacts on the wider locality, including residential amenity.

The proposed re-occupation of the premises will generate a series of further benefits including contributing towards local economic growth and the creation of new employment positions and wages.

The NPPF maintains a presumption in favour of sustainable development. It sets out that planning policies and decisions should help create the conditions in which businesses can expand and adapt. The NPPF requires significant weight be placed on the need to support economic growth and productivity<sup>1</sup> and the development accords directly with that objective.

The proposed use accords directly with the overarching objectives of the development plan and the NPPF in terms of facilitating economic growth and creating a strong and competitive economy.

### **Summary and Conclusion**

The application seeks planning permission for the change of use from a 'Betting Shop' (Sui Generis) to a 'Casino and Adult Gaming Centre' (Sui Generis) at 262 Tottenham Court Road in London.

The proposed development will facilitate an extension of the existing Grosvenor 'St Giles' casino which operates from the adjacent premises. The change of use of the floorspace at the application site will facilitate an enhanced ground floor presence for the established casino more appropriate to its scale and function.

The proposed entertainment use is entirely appropriate given the location of the Site within the 'Central London Frontage'. As the existing premises is currently in use within a 'Sui Generis' classification, there is no dilution of the existing retail function of the frontage or wider centre. The proposal accords with Policy TC2 of the Local Plan.

Given the scale of the premises and the minor proposed extension to the existing operation within the adjacent unit (71 sq. m), there will be no additional or new impacts over and above the existing position. It follows there will be no unacceptable impacts on residential amenity or other policy considerations.

Critically, the proposed development accords with the overarching objective of the NPPF to deliver sustainable economic development. It will facilitate private sector investment, economic growth and productivity and job and wage creation.

We conclude that there are no material considerations which outweigh the presumption in favour of development and accordingly we request that the application is approved and planning permission granted.

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<sup>1</sup> See Paragraph 81 of the NPPF.



We trust that the details included within this submission provide you with sufficient information to register and consider this application. We will endeavour to contact you within the next few days to establish your timetable for decision making.

In the meantime, should you require any clarification or additional information, please do not hesitate to contact Tim Price or Ross Fraser at these offices.

Yours faithfully

**Savills (UK) Limited**  
Planning

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cc. CJ Uhure - Rank