

COMMITTEE REPORT

Planning Committee on
Item No
Case Number

16 October, 2024
05
24/1335

SITE INFORMATION

RECEIVED	15 May, 2024
WARD	Harlesden & Kensal Green
PLANNING AREA	Harlesden Neighbourhood Forum
LOCATION	5-6 Park Parade, London, NW10 4JH
PROPOSAL	Change of use from betting shop (Use Class Sui Generis) to amusement centre (adult gaming centre) (Use Class Sui Generis).
PLAN NO'S	See Condition 2.
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><u>When viewing this on an Electronic Device</u></p> <p>Please click on the link below to view ALL document associated to case https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_168885</p> <p><u>When viewing this as an Hard Copy</u> .</p> <p>Please use the following steps</p> <ol style="list-style-type: none">1. Please go to pa.brent.gov.uk2. Select Planning and conduct a search tying "24/1335" (i.e. Case Reference) into the search Box3. Click on "View Documents" tab

RECOMMENDATIONS

A. That the Committee resolve to GRANT planning permission.

B. That the Head of Planning is delegated authority to issue the planning permission and impose conditions and Informatives to secure the following matters:


Conditions:

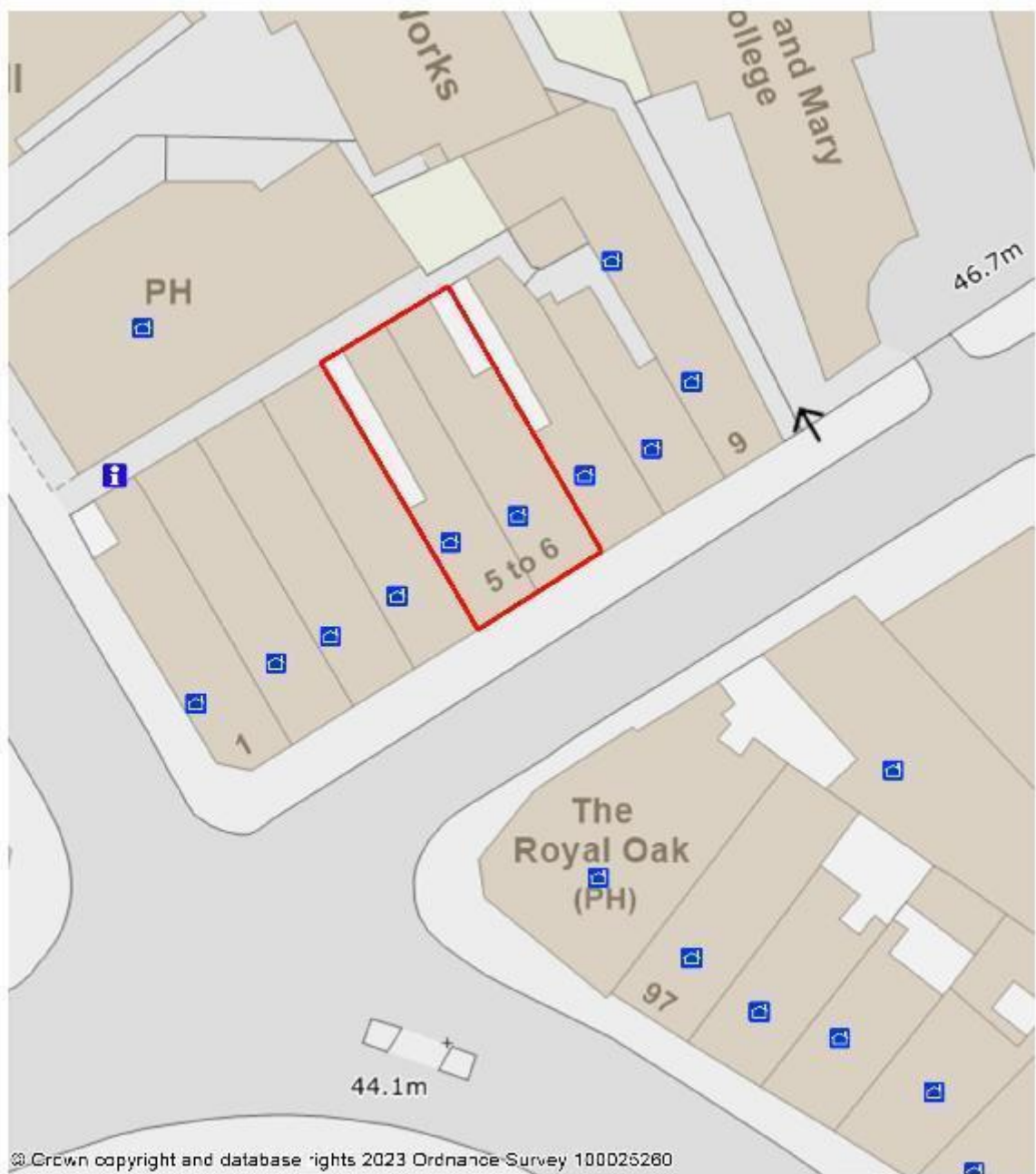
1. 3 Year time period
2. Approved plans / drawings
3. Window Display
4. Opening Hours
5. Noise

As set out within the decision notice

1. That the Head of Planning is delegated authority to make changes to the wording of the committee's decision (such as to delete, vary or add conditions, informatives, planning obligations or reasons for the decision) prior to the decision being actioned, provided that the Head of Planning is satisfied that any such changes could not reasonably be regarded as deviating from the overall principle of the decision reached by the committee nor that such change(s) could reasonably have led to a different decision having been reached by the committee.

SITE MAP

	Planning Committee Map Site address: 5-6 Park Parade, London, NW10 4JH © Crown copyright and database rights 2011 Ordnance Survey 100025260
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This map is indicative only.

PROPOSAL IN DETAIL

Change of use from betting shop (Use Class Sui Generis) to amusement centre (adult gaming centre) (Use Class Sui Generis).

EXISTING

This application relates to a double fronted ground floor commercial unit currently comprising a vacant betting shop. It sits within a three-storey Victorian terrace with residential properties above. The site is located within secondary shopping frontage within Harlesden Town Centre and The Harlesden Creative Cluster. The site is not listed but is located within the extended Harlesden Conservation Area. It also lies within the boundaries of the Harlesden Neighbourhood Forum.

The site is located in an Archaeological Priority Area and to the rear boundary of the site is a site of Archaeological Importance. It is within an air quality management area and the Harlesden and Willesden Junction Air Quality Focus Area. It is within a Critical Drainage Area (as identified with the West London Strategic Flood Risk Assessment).

SUMMARY OF KEY ISSUES

The key planning issues for Members to consider are set out below. Members will need to balance all of the planning issues and the objectives of relevant planning policies when making a decision on the application:

- 1. Representations received:** 19 objections have been received. Officers have considered the comments and these are discussed in the report.
- 2. Change of Use/Principle of Development:** The existing site was previously in use as a double fronted betting shop. The proposal is for the change of use from a vacant double fronted betting shop to an adult gaming centre, no external alterations are proposed. The proposal has been assessed to comply with Policy BE5 of the Brent Local Plan and is not considered to lead to an over-concentration adult gaming centres in the vicinity of the application. Weight has been given to the planning application and appeal history on site.
- 3. Impact to Heritage, Character and Appearance:** The site is located within the Harlesden Conservation Area. No external alterations are proposed. Subject to a condition to ensure an appropriate level of active frontage, the proposed change of use is not considered to result in adverse harm to the character and appearance of the property, streetscene or wider area and it is considered that the proposed development would preserve the character and appearance of the Harlesden Conservation Area. Any forthcoming signage would be required to obtain Advertisement Consent.
- 4. Neighbouring Amenity/Noise:** The development has been assessed having regard to the proposed development and proximity of residential sensitive receptors with regard to the proposed operating hours, use and regard paid to the appeal decision and planning history. A condition to restrict opening times is proposed which is considered to be reasonable for the proposed use and size of the premises along with the submission and approval of a sound insulation condition.

RELEVANT SITE HISTORY

23/0989 – Refused but subsequently allowed at appeal (08/08/24)

Change of use from betting office to amusement centre (adult gaming centre) and alterations to shopfront at 5 Park Parade. Retention of (reduced size) betting office and alterations to the rear elevation comprising removal of louvre vent and installation of new door at 6 Park Parade.

Reason for refusal:

The proposed change of use would result in an unacceptable over-concentration of Adult Gaming Centres

and Betting Shops, which would harm the vitality and viability of Harlesden Town Centre. The proposed development is contrary to DMP 1 and BE5(d) of the Brent Local Plan 2019-2041.

22/1619 – Refused (06/07/2022)

Change of use from betting office to amusement centre (adult gaming centre) and alterations to shopfront at 5 Park Parade. Retention of (reduced size) betting office and alterations to the rear elevation comprising removal of louvre vent and installation of new door at 6 Park Parade.

Reason for refusal:

'The proposed change of use would result in an unacceptable over-concentration of Adult Gaming Centres, it would harm the vitality and viability of Harlesden Town Centre. The proposed development is contrary to DMP 1 and BE5 of the Brent Local Plan 2019-2041.'

20/3169 – Appeal Dismissed (14/10/2021)

Change of use from betting office (Use Class Sui Generis) to amusement centre (adult gaming centre) (Use Class Sui Generis).

00/1706 – Granted (19/09/2000)

Change of use from retail (Use Class A1) to licensed betting office (Use Class A2)

Condition 2: _

'The premises shall not be used except between the hours of 0800 hours and 2230 hours Sundays to Thursdays and between 0800 hours and 2300 hours Friday and Saturdays without the written consent of the Local Planning Authority.'

Reason: To ensure that the proposed development does not prejudice the enjoyment by neighbouring occupiers of their properties.'

CONSULTATIONS

A total of 164 consultation letters were sent, this is inclusive of Harlesden Neighbourhood Forum and Local Ward Councillors and the Metropolitan Police.

Site Notice put up: 08/08/2024

Press Notice published: 12/09/2024

A total of 19 objections were received, this is inclusive of a collective objection from the following Councillors:

Cllr Mili Patel – Harlesden and Kensal Green Ward
Cllr Jumbo Chan – Harlesden and Kensal Green Ward
Cllr Matt Kelcher

For clarity, the collective objection from Councillors has been counted as 3 objections.

The table below summarises concerns raised and provides officer comments or direct readers to the main body of the report:

Objections Raised	Officer comment
<u>Impact to vitality and viability of town centre and overconcentration of adult gaming centres</u> Over concentration of adult gaming centres (AGCs), pawn brokers or loan shops. Does not accord with Brent policies (BE5 and Harlesden Neighbourhood Plan cited). Undermines Local Plan and Harlesden Neighbourhood Plan. Lack of diversity in shops.	See main body of this report which addresses impact to vitality and viability of the town centre as well as the impacts of an overconcentration of

Concern about proximity to other AGC's and betting shops.

Other adult gaming centres and betting shops nearby. Silvertime already has a large presence in Harlesden.

Notes two AGCs in close proximity to 5-6 Park Parade. The AGC located at 53 High Street is 652 ft (199 metres) away and the AGC located at 10 Bank Building is 882 feet (268 metres) away.

Negative impact to town centres viability and diversity. Fails to comply with London Plan policy E9 C) 7.

Would not contribute to local economy. Extract money from community rather than attracting outside visitors or investing back into the area.

Undermines regeneration of the area and efforts to reset local and visitors' perceptions of Harlesden high street. We have a couple of quality outlets that have recently opened.

Reference made to OPDC Policies and Town Centre Health Check, they state betting shops, pawnbrokers and payday loans should not be located within 400m of one another.

Reference made to Borough of Islington in a Topic Paper 1 relating to gambling uses and states this confirms: 1. Adult gaming centres (AGC's) can have negative impacts where there are high concentrations of betting shops and AGC's.

The quality of our retail shops poor. Should promote a healthy town centre.

Over concentration of gambling shops and fast-food outlets. No additional diversity will be brought to the high street by granting this application.

Makes reference to the Harlesden Neighbourhood Forum, of all 148 District Centres in London, Harlesden has the second highest amount of betting office/casino floorspace at 1,700 sq. m.

The report stated: 'As Harlesden has no casino then this must be exclusively betting office and/or adult gaming centre floorspace.' The plan therefore supported a policy of managing clusters of such venues to prevent over-concentration.

Could be used as an alternative use that provides positive benefit for the community. For example, a shop or a library. Choose to support the regeneration of this wonderful, diverse community.

Undermining wider policies. Must look at the potential benefits and harms of any application and the impact on the wider population and policies of the council.

Representation notes that the calculations that used by the applicant based their assessment of the number of adult gaming centres and pawnbrokers / payday loan shops on the fact that the use of 46 High Street "is about to change to retail". States that the proposed change of use had not taken place at the time the application was submitted and therefore the 3% threshold required by the policy cannot be complied with.

No explanation as to why Park Parade has a particular need for another gaming centre.

Would undermine positive developments and result in negative impact for community's economic, social, and health landscape.

Harlesden not listed in London Plan for night time economy, yet applicant

such uses.

The impact of non-retail uses is discussed within the Principle of Development Section.

Planning policies of other Planning Authorities cannot be applied within Brent.

Marketing information is not required by the planning policy and officers cannot speculate on the reasons for the unit remaining vacant. The Council cannot consider whether there is a commercial need for an adult gaming centre.

Please see 'Principle of Development section of this report.

A Planning Condition is recommended to address level of active frontage.

Money laundering is an illegal activity which should be reported to the Police. It is not a material planning consideration.

The 'image of Brent' or articles in the press if of themselves is not a material planning consideration.

refers to contributing to night-time economy. It refers to theatres and hotels, not gambling centres.

Growing a night time economy in this form would not enhance Harlesden town centre.

Shop Vacancy .

Reference made to shop vacancy.

Notes the shop has been vacant, but that there is no evidence of marketing.

Although vacant an AGC would not improve Harlesden's Vitality and viability.

Vacancy rate concern and any active retail is welcomed subject to constraint, including active frontage.

Vacant, any new use would bring employment of some kind, however gambling facilities are often staffed by single individuals.

Number of businesses used as fronts for money laundering.

Reference made to a national press article last year picked up on the concerns of constituents and dubbed this high street 'the UK's Las Vegas' due to the prevalence of gambling establishments. Not the image wanted for Brent.

Increase in anti- social behaviour, crime and disorder, littering, noise and disturbance. .

Already problem in area with crime and anti-social behaviour. Concern proposal would worsen crime and anti-social behaviour.

Use will encourage loitering, crime, noise, disruption and disorder.

Regular arrests by police, multiple stabbings, drug dealing offences and fights on this street. Granting permission will exacerbate the problems.

Crimes like robbery, car theft as is drug dealing and use.

Park Parade hot spot for anti-social behaviour. Small street has seen the highest use of closure orders in Brent as police have acted to close facilities contributing to local issues. Another late night facility will not help the situation. Harlesden Police sent in an objection to the previous application for an AGC at this site.

Already gambling shops, fast food outlets and businesses that are clearly fronts for drug-dealing. States council is aware noting a number of shop fronts raided in recent months due to drug dealing.

Actively encouraging people to commit crimes in order to be able to gamble.

Concerns about safety and not being able to live peacefully.

Reference made to experiences of theft and burglaries.

Noting people looking for cash not goods.

Gambling encourages anti-social behaviour.

A number of shop fronts raided in recent months due to drug dealing and burglaries on road just this week (w/c 27th May 2024).

Police objected to previous applications.

The previous application and appeal decisions are material planning considerations. The Planning Inspector did not support the Local Planning Authorities view in terms of impact of the proposal on crime, anti-social behaviour and disorder. Please see the Planning Background section as well as a further assessment with the 'Impact to Residential Amenity' section of this report.

Concern about gangs loitering.

Use would attract ASB (anti-social behaviour) /opens up late and has in turn led to many years of complaints from residents and businesses alike.

Resource intensive to police.

Local police officers in the Harlesden and Kensal Green Safer Neighbourhood Team share view that these businesses encourage antisocial behaviours. An earlier witness statement concluded with the line: "Customers do not know a suitable time to call it a day so therefore will continue to stay at the shop for longer, getting more and more intoxicated and getting abusive and threatening. Not sure why this is suitable for a street that is already so high in ASB."

Local residents are trying to improve the area. Local police and councillors are trying to decrease issues.

Harm outweighs benefits. No benefit to community. Level of objection would suggest the opposite.

Operational Hours

Premises likely has antisocial hours will contribute to the detriment of the area and encourage this behaviour, as opposed to benefitting it and improving it. It will make area feel less safe, particularly for young families and noisier.

Already too many noisy/antisocial cafes.

Close to residential use.

Please see Impact to Residential Amenity section of the report

Transport Impacts

Concerns about impact to parking, suggesting not enough parking to accommodate another entertainment establishment, concern regarding more congestion and air pollution.

Park parade footfall in area crowded, concern more people to loiter outside will result in pavements becoming more congested, could cause more people to go into the already busy road around the Park Parade and Harrow Road cross section.

The site is in an excellent accessibility area and has a PTAL (Public Transport Accessibility Rating) of 6a which is the best rating.

Given the accessible location, existing use and size of the premises, it is not considered to give rise to significant numbers as to significantly impact parking, congestion or air pollution.

Given the size of the premises and taking into consideration the existing use, it is not considered that the proposed use would give rise to significant numbers of people as to cause an obstruction of the pavement outside.

Social impacts

High levels of debt and deprivation and vulnerable people, proposed development would make this worse.

Concerns about impact to crime, poverty, addiction and well-being. Raises concerns regarding the negative impacts to health and wellbeing. Reference made to studies about the impacts of gambling.

Will harm the local community.

Referred to July 2020, Brent independent report - A fairer future; Ending Poverty in Brent, which identified Harlesden as an area in Brent with a high concentration of poverty, which only increased during the pandemic. This remains the case:

A quarter of people in Harlesden live below the poverty line

Of those households in the neighbourhood who are in debt to the council, the average owed is £3,084

More than half of the members of the Community Shop in Brent (which provides food and other support to those most in need) are from the Harlesden area

Would undermine the council's wider objectives to fight poverty. They would also bring harm to the area.

Site few metres away from Brent Council's "EACH" facility which treats very vulnerable people with addiction issues. Placing a brightly coloured gambling establishment right opposite this desperately need facility can only lead to further harm.

All have a responsibility to try to enhance our neighbourhoods and provide environments for communities to flourish - another gambling ("gaming") centre does not.

Report referred to: Geography of Gambling Premises in Britain - University of Bristol July 2021:

'While the gambling industry may offer some much needed employment in these areas. It usually takes much more than it gives, leaving a legacy of greater hardship and increased social problems'

Harlesden targeted by gambling firms because there are so many local vulnerable people.

Notes NPPF sustainable principles and states this contravenes such principles. Refers to NPPF and '*support local strategies to improve health, social and cultural well-being for all*'.

Undermines good things people are trying to do in neighbourhood and threatens the positive steps made with families moving in, houses being fixed up, and positive businesses which make it a nicer place to be.

Already huge inequality in area. Reference made to Brent Poverty Commission Report, case studies include those addicted to gambling.

Results in addiction, exploiting those with addiction. Robs people of little money they have.

Should encourage businesses for jobs and community spirit. Does not serve community. Schools/places of education nearby and near key transport, main thoroughfare.

The Council can only consider planning policies and material planning considerations, and the policies relating to are discussed in this report. Nevertheless, the Council must also consider potential equalities impacts associated with a proposal.

With regard to the impact on children, there is a statutory requirement to exclude under 18s from AGCs.

The Gambling Commission sets out the Licence Conditions and Codes of Practice (LCCP), which are applicable to operators of AGCs. Monitoring and enforcement is undertaken by local authority licensing officers and the Gambling Commission's licensing officers. It is that regulatory, licensing and enforcement framework which is intended to enable safe gambling as a leisure activity whilst protecting children and vulnerable persons and ensuring that there is no association with anti-social behaviour and criminal activity.

Inappropriate location given proximity to several schools – notably St Claudine's and Newman College. Opening another brightly illuminated gambling den on the street will further glamourise and normalise gambling to young people.

Concerns for harm to young and/or vulnerable people. Inappropriate and intimidating for children, a woman who also has to walk past the site alone on a regular basis and encourages crime and seediness.

A betting shop and casino would alienate residents and visitors. Would make Harlesden a less desirable place to live and visit.

Impacts to social and mental health and family breakdowns. Use is negative for health and does not contribute to a healthier place to live.

Refers to Policy SD9:

'Town centre strategies should be tailored to each town centre. A clear vision should be developed with the local community, taking account of the town centre strategic role, opportunities for growth, potential to support regeneration, special characteristics, economic challenges and location in inner and outer London.

'Paragraph 2.10.2 states 'In order for regeneration initiatives to contribute to good growth it is important that they tackle poverty, disadvantage, inequality and the causes of deprivation, address social, economic and environmental barriers and benefit existing residents and businesses in the area. Regeneration can take many forms and involve changes of different scale and with different impacts, depending on the needs of local communities and the character of the area.'

Would add problems to an already economically deprived area.

Concern that more than one Silvertime AGC might be allowed to run business in this area where children and families congregate.

Rebranding to gaming centre may make it more attractive to young people.

References made to the Brent's 2019 Statement of Principles for Gambling, noting first principle is to prevent gambling. Notes that gambling is a source of crime or disorder. States that statement from police makes this association.

References made to the 2019 Statement of Principles for Gambling noting that *the cost to the borough of gambling-related harm is, per the 2012 Health Survey for England in excess of £2 million. At a time when services are hard hit by the impact of COVID -19 it seems illogical to increase the burden on services by expanding the impact of a recognised co-morbidity. In 2019 there were 94 licensed gambling premises in Brent. These have a dire impact in a deprived borough. Allowing an adult gaming centre to operate from 9am-midnight in an area with a late night economy of late-opening cafes and a pub cannot rationally accord with Objective 1 of the Statement of Principles for Gambling.*

Doesn't make Harlesden a nice place to live and work

Vulnerable people at risk.

Advertising encouraging gambling, references to advert impact studies.

Opening an Adult Gaming Centre at this location would undermine Objective Three of the gambling principles, namely to protect 'children and other vulnerable persons from being harmed or exploited by gambling'.

Normalises gambling to local children. Businesses like this don't send the right message to young people. Majority of families living in the area and such businesses attract undesirable individuals to streets further making area feel insecure.

Too many people living in poverty around here and the job of the government/council should be to help them get out of it, not put even more businesses like this in their doorstep.

Help make Harlesden a healthier place to live.

Many residents trying to improve quality of life in the local area and this gaming centre will only make things worse.

Supporting the work of the Brent Poverty Commission

The Brent Poverty Commission Report - established by the Council - highlighted issues of deprivation and high household debt in the area. Case studies included those from local people who became addicted to gambling.

Notes Harlesden is one of the poorest places in Brent. No need for more places where locals can be encouraged to lose their hard-earned money.

The opening of another AGC in the area (one, indeed, that remains open until 10pm) can only lead to an increase in gambling harm and undermine the Brent local plan's vision of creating a healthy borough which improves physical and mental wellbeing.

Protect residents' interests not 'life ruining businesses.'

No explanation of how the facility will help overcome local problems.

Reference made to Borough of Islington in a Topic Paper 1, noting gambling affects not only problem gamblers, but their close family and the surrounding community, that Vulnerable people are more likely to experience issues and difficulties with gambling and that people with substance misuse problems are more vulnerable to problem gambling.

Weight should therefore be afforded to the evidence contained in the Topic Paper which confirms that those living in deprived areas such as Harlesden centre are more vulnerable to gambling-related harm. The proposal will have an adverse impact on community safety and security, as well as mental and physical health and wellbeing of residents and workers alike.

Visual appearance

Impact to active frontage. Reference made to advertising on windows.

Brightly coloured gambling establishment.

Please see 'Impact to Character and Appearance section of this report'.

Previous cases/appeals

Reference made to previous refusals and appeal decisions. Planning was refused and states nothing has changed since/ the application is similar to previous application.

Application refused by planning committee due to overconcentration and not according with policy, notes previous application was for half of the unit as

The applicant has the right to lodge repeated applications in this instance. The appeal process is managed by

an AGC and that this application relates to the full site as a proposed AGC.

Questions why another application has been accepted by Brent Council.

Multiple applications, wasting time. Objected previously. Suspect applicants think residents will tire of commenting.

Questions if repeat appeals can be stopped.

Support Planning Committee's decision (23/0989).

Reference made to repeated licence applications.

New application lodged; communities' opposition has been disregarded.

Other _

More casinos and betting shops may need to more strain on council resources in terms of financial and social support/housing discretionary payments.

Consider re-locating if application is approved.

Reduce value of property.

Contests statements made in supporting planning documents.

the Planning Inspectorate. Each application is determined on its own merits.

The detailed considerations section of this report provides an analysis of the site planning history and differences between the previous case and this proposal. This is summarised in the 'Planning Background' section of this report.

Licensing applications are a separate legislative regime to planning.

Representations received have been considered when evaluating this application. It should be noted that applications must be considered against adopted planning policy.

Whether or not the proposed Adult Gaming Centre will result in potential financial or other impacts which will place further strain on local authorities cannot be considered within this planning application.

The proposal that has been submitted to the Council must be considered and potential alternative locations cannot be evaluated.

Impacts to the value of nearby properties is not material planning consideration.

Representation received contest the information

put forward by the applicant in terms of impact. This is noted. A full assessment has been made in relation to adopted planning policy and this is discussed in the detailed considerations section of this report.

POLICY CONSIDERATIONS

POLICY CONSIDERATIONS

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of this application should be in accordance with the development plan unless material considerations indicate otherwise.

The development plan is comprised of the

London Plan 2021
Brent Local Plan 2019-2041
Harlesden Neighbourhood Plan 2019-2034

Relevant policies include:

London Plan 2021

D4: Delivering Good Design
D12: Fire Safety
D14: Noise
E9: Retail, markets and hot food takeaways
T4: Assessing and Mitigating Transport Impacts
T5: Cycling
T6: Car Parking

Brent Local Plan 2019-2041

DMP1: Development Management General Policy
BD1: Leading the Way in Good Urban Design
BCH1: Brent's Heritage Assets
BE5: Protecting Retail in Town Centres
BE7: Shop Front Design and Forecourt Trading
BT1: Sustainable Travel Choice
BT2: Parking & Car Free Development

Other material considerations

The following are also relevant material considerations:

National Planning Policy Framework
National Planning Practice Guidance

Harlesden Character Appraisal
Harlesden Conservation Area, Conservations Area Extensions Designation Assessment (2022)

Supplementary Planning Guidance / Documents:
SPD1 – Brent Design Guide 2018

DETAILED CONSIDERATIONS

Planning Background

1. This application relates to a double fronted ground floor commercial unit currently comprising a vacant betting shop. It sits within a three-storey Victorian terrace with residential properties above. The site is located in the extended Harlesden Conservation Area within secondary shopping frontage within Harlesden Town Centre.
2. The previous planning history is a material consideration when determining a planning application.
3. An application (Local Planning Authority Ref: 23/0989) for the 'Change of use from betting office to amusement centre (adult gaming centre) and alterations to shopfront at 5 Park Parade. Retention of (reduced size) betting office and alterations to the rear elevation comprising removal of louvre vent and installation of new door at 6 Park Parade' was refused at planning committee.
4. The Committee overturned the recommendation for approval and refused the application for the following reason:

'The proposed change of use would result in an unacceptable over-concentration of Adult Gaming Centres and Betting Shops, which would harm the vitality and viability of Harlesden Town Centre. The proposed development is contrary to DMP 1 and BE5(d) of the Brent Local Plan 2019-2041.'

5. The decision was appealed (Appeal Ref: APP/T5150/W/23/3332772) and allowed by the Planning Inspectorate with permission granted subject to conditions relating to approved drawings, hours of operation, noise insulation, window display and the erection of an access ramp.
6. The main differences between the appeal scheme and this revised application are:
 - The previous scheme was for the change of use of number 5 Park Parade from betting shop to an adult gaming centre, whilst a reduced sized betting shop would be retained at number 6 Park Parade.
 - No external alterations are proposed within this application, whilst the previous application included alterations to shopfront at number 5 Park Parade and alterations to the rear elevation comprising removal of louver vent and installation of a new door at 6 Park Parade.
7. Prior to this appeal decision an application (Local Planning Authority Ref: 20/31698) for the change of use from betting office (Use Class Sui Generis) to amusement centre (adult gaming centre) (Use Class Sui Generis) was refused for the following reasons:

The proposed change of use and operational hours would result in an unacceptable over-concentration of Adult Gaming Centres, it would harm the vitality and viability of the Harlesden Town Centre and is likely to result in exacerbated negative impacts such as noise disturbance, crime and anti-social behaviour. The proposed development is contrary to DMP 1 and DMP 3 of the Brent Development Management Policies Plan (2016).

Insufficient details have been submitted in regard to the external alteration (staircase, access and changes to window) as such the Local Planning Authority is unable to fully consider the impacts of the external alterations, contrary to Policy DMP 1 of the Brent Development Management Policies (2016).

8. The application was appealed (Appeal Ref: APP/T5150/W/23/3332772) and dismissed. The Inspector agreed that the proposed development would result in an exceedance of 3% of the frontages in use as adult gaming centres or pay day loan shops, resulting in an overconcentration of uses within the frontage. The Inspector concluded the proposal would have a harmful effect on the vitality and viability of Harlesden Town Centre.
9. The Inspector also found that the proposal would result in harm to the living conditions of occupiers of neighbouring properties with regards to noise and disturbance. However, they did not support the Local Planning Authorities view in terms of crime, anti-social behaviour and disorder, at paragraph 16 of the

Appeal Decision they stated:

'From the evidence before me, I am not convinced that the proposal would have a harmful effect on crime, disorder and anti-social behaviour in the surrounding area.'

10. Finally, the Inspector agreed that there was insufficient information provided to determine whether the proposed external alteration such as an external staircase would be acceptable.
11. A later planning application (reference: 22/1619) was submitted for the 'Change of use from betting office to amusement centre (adult gaming centre) and alterations to shopfront at 5 Park Parade. Retention of (reduced size) betting office and alterations to the rear elevation comprising removal of louvre vent and installation of new door at 6 Park Parade'.
12. Key changes between the above case (Ref: 22/1619) and the dismissed case include:
 - The proposal sought to divide the unit into two units, resulting in the change of use of number 5 Park Parade; with the retention of 6 Park Parade as a reduced sized betting office.
 - Alterations to the frontage of number 5 including the addition of a door and recessed entrance area
 - To the rear the existing louvre vent to the plant room was to be removed and a new door was proposed with the remaining area being bricked up
13. The operating hours were previously proposed to be 24 hours in the dismissed appeal scheme, whereas the later refused scheme sought the following opening hours
 - Monday to Friday, Saturdays & Bank Holidays: 08:00-22:00
14. This later scheme (ref 22/1619) was refused on 06/07/2022 for the following reason:

'The proposed change of use would result in an unacceptable over-concentration of Adult Gaming Centres, it would harm the vitality and viability of Harlesden Town Centre. The proposed development is contrary to DMP 1 and BE5 of the Brent Local Plan 2019-2041.'

15. The applicant outlined within their Planning, Design and Access Statement which supported the most recent planning application (Ref: 23/0989) and appeal (Ref: APP/T5150/W/23/3332772) that there has been a change to the proportion of frontage in pay day loan use and as such the proposed development complied with the overall 3% threshold for adult gaming centres, pawnshops and payday loan shops collectively, as outlined within Policy BE5 of the Brent Local Plan.

Procedural Matters

16. The site is now located within the extended Harlesden Conservation Area. The designation of the extended Conservation area occurred after the Local Appeal Authority determined the planning application, yet the appeal decision was issued after its designation. As a result, the appeal decision did not take the designation of the site as within a Conservation Area into account.
17. In December 2023 an update to the National Planning Policy Framework (NPPF) was published, but the Inspector noted that this did not alter the assessment of this appeal scheme.

Principle of Development

18. This application relates to a double fronted ground floor commercial unit currently comprising a vacant betting shop. It sits within a three-storey Victorian terrace with residential properties above. The site is located within secondary shopping frontage within Harlesden Town Centre and located within the extended Harlesden Conservation Area.
19. This application seeks planning permission for the change of use of the existing double fronted betting shop at number 5-6 Park Parade, to a double fronted adult gaming centre (Sui Generis Use Class). No external alterations are proposed.
20. London Plan policy E9 C) 7 states development should manage clusters of uses having regard to their positive and negative impacts on town centre vitality, viability and diversity. An overconcentration of uses can reduce the diversity of offer of a town centre and can therefore impact on its ability to meet local

needs as well as its vitality.

21. Policy BE5 relates to betting shops, adult gaming centres and pawnbrokers, it seeks to prevent an over-concentration of particular uses in close proximity to a unit in the same use. The diversity of uses can be impacted by over concentration of uses, it can impact the town centre's ability to meet local need as well as the vitality and viability.
22. Harlesden Neighbourhood Plan asserts that although many of the services taking over shop units attract people to town centres, some are less of an attraction and an over-concentration especially can lead to a centre being less attractive to shoppers and other visitors. It asserts that Harlesden has the second highest level of 'casino/betting floorspace, it then goes on to say that Harlesden has no casino and this must relate to betting and/or adult gaming centre floorspace.
23. Brent Local Plan Policy BE5 outlines criterion where Betting Shops, Adult Gaming Centres and Pawnbrokers may be considered acceptable in principle.
24. The relevant criterion is there for a), b) and d) as listed below:
 - a) *no more than 4% of the town centre frontage consisting of betting shops;*
 - b) *no more than 3% of the town centre frontage consisting of adult gaming centres or pawnbrokers/payday loan shops;*
 - c) *no more than 1 unit or 10% of the neighbourhood parade frontage, whichever is the greater, consisting of betting shops, adult gaming centres or pawnbrokers/payday loan shops;*
 - d) *a minimum of 4 units in an alternative use in-between each.*
25. Criterion a) is not relevant, though the proposal would result in the reduction of a double fronted betting shop use.
26. The proposed development would not result in more than 3% of the town centre frontage consisting of adult gaming centres or pawnbrokers/payday loan shops and therefore complies with criteria b.
27. It is noteworthy that, since the refusal of reference 22/1619 (06/07/2022), number 89 High Street Harlesden, which was formerly in use as a pawnbroker has been occupied by a retail use. This has resulted in a reduction in the frontage of length of the town centre in pawnbroker use (captured under criteria b of policy BE5).
28. The site is not located within a neighbourhood parade frontage, the Criteria c) is not relevant.
29. Criteria d) requires that a minimum of 4 units in an alternative use in-between each use. It is acknowledged that the wording within criteria d) is arguably open to interpretation as the wording within the policy itself refers to a "minimum of 4 units in alternative use in-between each" without clarifying whether that is between each separate use of each separate unit.
30. Supporting text has been provided to explain the purpose of the policies within the plan, this is considered to be the correct interpretation. As such, the proposal complies with this part of the policy as there are a minimum of 4 units in alternative use between each use. For clarity, the following is specified within paragraph 6.4.39 within the Local Plan:

'To ensure there is not an overconcentration of particular uses within any single length of frontage the policy seeks to prevent adult gaming centres, pawnbrokers, betting shops and takeaways locating in close proximity to a unit in the same use.'
31. At Paragraph 10 of the appeal decision (Ref: APP/T5150/W/23/3332772) the Inspector noted.

'Although there would be a betting office adjoining, there would not be another AGC within 4 units either side of the proposed AGC. The proposed sub-division of the property and the creation of a betting office and AGC would, therefore, not conflict with BLP Policy BE5 and, as such, the retail function of Harlesden town centre would be protected.'
32. Unlike the previous scheme (LPA Ref: 23/0989, Appeal Ref: APP/T5150/W/23/3332772) which proposed the sub-division of the unit with one unit being a betting shop and the other proposed as an adult gaming centre, this revised proposal is for a change of use of the double fronted unit to an adult gaming centre,

with no sub-division.

33. In line with the above interpretation of Policy BE5 criteria (d) as cited in the appeal decision, an assessment has been and identified that there are no adult gaming centre uses within 4 units either side of the proposed site. Consequently, the proposed development complies with Policy BE5 criteria (d).
34. In summary, the proposed change of use would not result in an unacceptable over-concentration of Adult Gaming Centres as defined by the Council's policy, it would therefore not harm the vitality and viability of Harlesden Town Centre. The proposed development is considered to be in accordance with to DMP 1 and BE5 of the Brent Local Plan 2019-2041. The principle of development is in accordance with the Council's policies and the London Plan and therefore is considered acceptable.
35. 5-6 Park Parade have been vacant since at least December 2020 and have been subject to continuous vandalism harming the impression of the town centre. As a double fronted vacant unit it currently offers no meaningful contribution to the vitality or viability of the Town Centre.
36. Objections state a preference for an alternative use to be proposed on site. Marketing information is not required in relation to proposals for adult gaming centres as the Council's policies examine the concentration of such uses rather than the evaluation of alternative uses. It is therefore not known (and not required to be shown by the applicant) whether this unit could have been let for alternative purposes instead of remaining vacant.
37. Objections have been received in relation to the vitality and viability as well as the concentration of adult gaming centres and betting shops in the town centre. Objections have also been received in regard to the proximity to other gambling premises, noting number 10 Bank Buildings and number 53 Harlesden High Street. These are located approximately 163m and 170m from site respectively. Nevertheless, the proposed development is not considered to result in an unacceptable concentration or clustering of such uses when taking into account the parameters set within the adopted policies.
38. Policy BE5, Criterion b) addresses this matter and seeks to limit the proliferation of uses such as adult gaming centres. The proposed development would not result in more than 3% of the town centre frontage in adult gaming, centres/pawnbrokers/payday loan shops thereby complying with criteria b and complies with Criteria d) that requires that a minimum of 4 units in an alternative use in-between each use.
39. In summary, the proposed change of use would not result in an unacceptable over-concentration of Adult Gaming Centres as defined within the Council's adopted policies, it therefore would not harm the vitality and viability of Harlesden Town Centre. The proposed development is in accordance with to DMP 1 and BE5 of the Brent Local Plan 2019-2041. The principle of development is in accordance with the Council's policies and the London Plan and therefore is considered acceptable.

Impact Residential Amenity

40. The site is located within a town centre with commercial uses at ground floor and residential uses above. Objections were received in relation to impact to residential amenity.
41. It is considered that the proposed use, including the type and number of machines and commercial activity would result in the transmission of noise from commercial activity at the ground floor to the residential units above. Therefore, if the application was minded for approval a condition requiring the submission of a scheme of sound insulation measures to be submitted to the Local Planning Authority for approval would be recommended. It is noteworthy that the Inspector in Allowing the Appeal requested a condition in relation to sound insulation.
42. Brent's Environmental Health Team were consulted on the previous application and raised no objection, they referred to the need to limit noise from plant, yet no plant is proposed as part of this application.
43. The application has applied for the following operational hours for both units:
 - Monday to Friday, Saturdays & Bank Holidays: 08:00-22:00
44. Under reference 00/1706 which was a change of use to a betting shop, condition 2 restricted the use between 8am -10:30pm Sunday to Thursday and between 8am and 11pm Friday and Saturday, the reason attached was *'To ensure that the proposed development does not prejudice the enjoyment by neighbouring occupiers of their properties.'*

45. Application reference 20/3169 was for the change of use to a double fronted AGC and proposed 24 hours use. At paragraph 11 of the appeal decision the Inspector stated:

'The proposal would be in close proximity to residential properties, mainly upper floor flats. It has been indicated that the proposal would operate 24 hours a day which would lead to comings and goings at times which are late at night or early in the morning. Customer movements during hours when noise levels are usually low would be prominent and much more noticeable which would result in occupiers of surrounding properties being unduly disturbed.'

46. At paragraph 12, the Inspector emphasised noise during the night and in the early morning.

47. Furthermore the most recent appeal decision (Appeal Ref: APP/T5150/W/23/3332772) for the sub-division of the property and the creation of a betting office and AGC at paragraph 18 noted:

The previous Inspector had concerns about the potential impact of noise and disturbance on the occupiers of near-by residential properties associated with the customers of the proposed AGC. However, the previous proposal was for a 24 hour operation rather than the proposed AGC closing at 22:00 hours. Although the concerns of local residents have been noted, there is no objection to the proposed hours of operation from the council's Environmental Health Officers and this closing time would be 30 minutes earlier than the condition which controls the opening of the current betting office use. Suitable conditions to control the hours of opening and the provision of noise insulation could be imposed if this appeal succeeds and this would ensure that there would not be a conflict with BLP Policy DMP1(a).

48. The Inspector attached a condition restricting the premises opening hours to customers to between 08:00 to 22:00, as well as a pre-commencement condition relating to sound insulation, it required the submission of sound insulation measured to be submitted for approval and any subsequently approved details to be implemented prior to its first use. It is considered necessary to recommend these conditions in interest of protecting residential amenity of residential flats above and adjacent to the site.

49. Given that the proposed development now proposed reduced opening hours as listed above, taken with the appeal decision noted above and Town Centre location, it is not considered that the proposed comings and goings would result in adverse noise and disturbance if both premises are restricted to the hours proposed.

50. Comments were received raising concern that the use would result in crime, disorder and anti-social behaviour, noting the Police objected to a previous applications. Previous comments from the Police Safer Neighbourhoods Team suggested that adult gaming centres were driver for anti-social behaviour, maps were previously provided showing the location a concentration of anti-social behaviour, violence and drug offences. The comments noted a concentration around the Jubilee Clock and Silvertime gaming centre. The Safer Neighbourhood Teams raised similar concerns with the Appeal Scheme (Appeal Ref: APP/T5150/W/21/3269557) , a list of offences were submitted and the Inspector was furnished with this. The Inspector did not support the Local Planning Authorities view in terms of crime, anti-social behaviour and disorder, at paragraph 16 of the Appeal Decision (Appeal Ref: APP/T5150/W/21/3269557) they stated:

'The Council have detailed concerns relating to crime, disorder and anti-social behaviour including comments from local residents and bodies, the Police Safer Neighbourhoods Team and the Metropolitan Police. The Harlesden area is identified as an area of high deprivation with unemployment and homelessness levels generally high. There is no unequivocal link presented to me between these matters and the proposal which would result in a single AGC leading to a harmful effect on crime, disorder and anti-social behaviour in the area.'

51. In addressing concerns relating to crime, disorder and anti-social behaviour in the most recent appeal decision (Appeal Ref: APP/T5150/W/23/3332772), at paragraph 17 the Inspector noted the following:

'Local residents and the Police Service have identified concerns relating to crime, disorder and anti-social behaviour, including people being approached in the street for money. The Harlesden is also identified as an area of high deprivation with demographic indicators identifying that unemployment and homelessness levels are generally high. Reference is also made to the potential to encourage children to gamble because the appeal property is located close to a school. There is no unequivocal link presented between these matters to demonstrate that the proposed AGC would lead to a harmful effect on the fear of crime, disorder and anti-social behaviour in the area. In reaching this judgement, consideration has also

been given to the controls which would be imposed by a Gaming Licence and the assessment of the previous Inspector. Accordingly, there would not be a conflict with BLP Policy DMP1(f).'

52. Appeal decisions are a material planning consideration. As such, having regard to the appeal decisions, it is not considered that the proposed development would result in an unequivocal link between the addition of one adult gaming centre and the incidence of crime, disorder and anti-social behaviour.
53. A number of objections have been received in regard to the impact of betting shops and adult gaming centres (please see consultation section for more details). Planning and licensing are separate functions with different procedural and policy frameworks. The Gambling Commission sets out the Licence Conditions and Codes of Practice (LCCP), which are applicable to operators of AGCs. Monitoring and enforcement is undertaken by local authority licensing officers and the Gambling Commission's licensing officers. It is the regulatory, licensing and enforcement framework which is intended to enable safe gambling as a leisure activity whilst protecting children and vulnerable persons.

Impact to Heritage Assets, Character and Appearance

54. The site is located within the extended Harlesden Conservation Area. The designation of the extended Conservation area occurred on 28th May 2024. This was after application reference 23/0989 was refused by the Council on 25/10/2023, yet the appeal decision was issued after its designation (08/08/24). As a result, the appeal decision did take the designation of the site as within a Conservation Area into account.
55. There is a statutory duty to pay special attention to preserving or enhancing the character or appearance of the Conservation Area. Section 72(1) of the Planning (Listed Building and Conservation Area) Act 1990 (as amended) requires that with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
56. Chapter 16 of the NPPF (2023) relates to conserving and enhancing the historic environment. NPPF, Paragraph 195 recognises that heritage assets are an irreplaceable resource and seeks to conserve them in a manner appropriate to their significance. It is appropriate to consider the desirability of new development making a positive contribution to the local character and distinctiveness [203c].
57. Policy DMP 1, BD1 and SPD 3 (Shopfronts) advocate good design and seek to ensure that proposed development does not result in harm to the character and appearance of the site and surroundings. Policy BHC1 seeks to avoid harm to heritage assets and outlines a number of criteria relating to proposals for or affecting heritage assets.
58. This application relates to a double fronted ground floor commercial unit currently comprising a vacant betting shop. It sits within a three-storey Victorian terrace with residential properties above. The site is located in the extended Harlesden Conservation Area within secondary shopping frontage within Harlesden Town Centre. It should be noted that the proposal does not include any external alterations to the shop front itself.
59. Harlesden Conservation Area, Conservations Area Extensions Designation Assessment (2022) identified the terrace a 1-9 Park Parade to be of moderate significance. The Assessment identified that poor quality shop fronts and signs detract from the significance of Park Parade.
60. Brent SPD 3 relating to shop fronts asserts shopfronts should provide or maintain an active frontage. Whilst no external alterations are proposed the existing site has glazed panels, betting shops and adult gaming centres often do not maintain an active frontage, such obstructions undermine the requirement for an active frontage in the interest of vitality, particularly in town centre locations such as this site.
61. In the most recent appeal scheme (Appeal Ref: APP/T5150/W/23/3332772) at paragraph 10 the inspector noted:

'It would be possible through a suitable condition to control the window display to ensure the AGC maintains an active presence facing towards Park Parade.'

62. The Inspector attached the following condition (5) to the appeal decision:

'For the adult gaming centre hereby approved a clear and unobstructed window display facing Park

Parade shall be maintained at all times with non-tinted/obscured glass in the entrance door and front windows. Additionally, signage and/or visual obstructions on the entrance door and any of the windows may be allowed up to a maximum height of 1.2 metres from ground level but no promotional material shall be displayed on the windows or entrance door.'

63. It is considered necessary to recommend this condition in the interest of ensuring the proposed change of use would maintain a reasonably active frontage.
64. Signage would be subject to Advertisement Consent.
65. Subject to the above condition, it is considered that proposed development would preserve the character and appearance of the Harlesden Conservation Area. Furthermore, the proposed development would not result in harm to the character and appearance of the host site or wider surrounding area.

Transport Considerations

66. Car parking and servicing standards would remain the same. The site currently does not offer off street parking or servicing and no changes are proposed either, so maximum standards will continue to be complied with. The site lies in a town centre and has excellent access to public transport services, so there are plenty of alternatives to driving to the site available. Whilst it is not ideal to service from the main street, the site will not have frequent servicing needs.

Fire Safety

67. London Plan policy D12a indicates that the fire safety of developments should be considered from the outset. This includes measures to demonstrate space identified for the appropriate positioning of fire appliances, appropriate evacuation assembly points and floor layouts and cores planned around issues of fire safety for all building users.
68. A 'Fire Risk Assessment' has been submitted, it acknowledges the requirements of Policy D12a of the London Plan and does address some of these criteria within Policy D12a. It details an evacuation strategy/means of escape, identifies some fire hazards and details control measures, it refers to building regulation requirements in reference to measures to limit the spread of fire and development. Some reference is made to warning systems and fire extinguishing equipment, noting that they would comply with building regulations. Matters of testing and maintenance are also referred to.
69. Some of the information is not detailed pursuant to Policy D12A which intends to ensure fire safety is considered early in the development process and accordingly deals with fire safety matters that could relate to land use planning. However, it is not intended to replace the detailed information required through Part B of the Building Regulations and given the nature of the change of use and location, it is considered reasonable to determine this case with an informative to the applicant regarding their obligations under Building Regulations.

Flooding and Sustainable Drainage

70. Local Plan Policy BSUI4 sets out proposals for minor developments, householder development, and conversions should make use of sustainable drainage measures wherever feasible and must ensure separation of surface and foul water systems. Proposals that would fail to make adequate provision for the control and reduction of surface water run-off will be refused.
71. Local Plan Policy BSUI4 requires new developments to make use of sustainable drainage measures wherever feasible and ensure separation of surface and foul water systems. On site water management and surface water attenuation suggest that proposals should submit a Drainage Strategy in line with the hierarchy set out in policy SI13 of London Plan and must ensure separation of surface and foul water systems.
72. The site is in Flood Zone 1 (low risk of flooding). It is located within a Critical Drainage Area (as identified with the West London Strategic Flood Risk Assessment), however no external alterations are proposed.
73. In this circumstance, given the nature of the change of use, low risk of flooding and lack of external alterations, it is considered that the proposal is acceptable in regard to flood risk and drainage and such reports are not necessary.

Biodiversity and Urban Greening

74. Policy BGI1 (d) sets out the need for all developments to achieve a net gain in biodiversity and avoid any detrimental impact on the geodiversity of an area.
75. Biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990, for major applications made on or after 12th February 2024. Non-major developments are also required to achieve the net gain in biodiversity for applications made on or after 2nd April 2024.
76. This application is not considered to meet the development threshold for biodiversity net gain both in terms of local policy requirements or mandatory requirements given that it is for a change of use and does not include any external alterations.

Accessibility

77. The Inspector attached the following condition to the recently 'Allowed Appeal' in relation to accessibility.

'Prior to the commencement of the use of 5 Park Parade as an adult gaming centre hereby approved, an entrance ramp shall be provided for customers which is sufficient to allow wheelchair access in accordance with Part M of the Building Regulations and the ramp shall thereafter be retained and maintained.'

78. Given that there are now no external alterations, changes to the entrance or no sub-division of the unit, this condition is not considered reasonable to recommend.

Equalities

79. In line with the Public Sector Equality Duty, the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. In making this recommendation, regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).

Conclusion

80. The principle of development is acceptable and would not result in an over concentration of AGCs within Harlesden Town Centre as defined within the council's planning policies or result in harm to the vitality and viability of the town centre. The proposed development is considered to be acceptable in terms of impact to character and appearance of the subject property and the wider streetscene and the development would preserve the character of the Harlesden Conservation Area. The proposed development is not considered to have an adverse impact on the amenities of neighbouring properties. Subject to conditions, the proposed use would be acceptable and not result in harm to the locality and neighbouring occupiers. The proposal is considered to be in general accordance with the development plan having regard to material considerations.
81. Approval is accordingly recommended.

DRAFT DECISION NOTICE



Brent

DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

DECISION NOTICE – APPROVAL

Application No: 24/1335

To: Roger Etchells
Roger Etchells + Co
7 Francis Lane
Newton Burgoland
Coalville
Leics
LE67 2SD

I refer to your application dated **15/05/2024** proposing the following:

Change of use from betting shop (Use Class Sui Generis) to amusement centre (adult gaming centre) (Use Class Sui Generis).

and accompanied by plans or documents listed here:
See Condition 2.

at **5-6 Park Parade, London, NW10 4JH**

The Council of the London Borough of Brent, the Local Planning Authority, hereby **GRANT** permission for the reasons and subject to the conditions set out on the attached Schedule B.

Date: 08/10/2024

Signature:

David Glover
Head of Planning and Development Services

Notes

1. Your attention is drawn to Schedule A of this notice which sets out the rights of applicants who are aggrieved by the decisions of the Local Planning Authority.
2. This decision does not purport to convey any approval or consent which may be required under the Building Regulations or under any enactment other than the Town and Country Planning Act 1990.

DnStdG

SUMMARY OF REASONS FOR APPROVAL

- 1 The proposed development is in general accordance with the:-

National Planning Policy Framework 2023
The London Plan 2021
Brent Local Plan 2019-2041
Harlesden Neighbourhood Plan 2019 -2034

- 1 The development to which this permission relates must be begun not later than the expiration of three years beginning on the date of this permission.

Reason: To conform with the requirements of Section 91 of the Town and Country Planning Act 1990.

- 2 The development hereby permitted shall be carried out in accordance with the following approved drawings:

Location Plan
A2938/SK1 – Existing & Proposed Ground Floor Layout + Elevation

Reason: For the avoidance of doubt and in the interests of proper planning.

- 3 For the adult gaming centre hereby approved a clear and unobstructed window display facing Park Parade shall be maintained at all times with non-tinted/obscured glass in the entrance door and front windows. Additionally, signage and/or visual obstructions on the entrance door and any of the windows may be allowed up to a maximum height of 1.2 metres from ground level but no promotional material shall be displayed on the windows or entrance door.

Reason: In order to provide and maintain active frontage and to maintain a positive character of the shopping area.

- 4 The premises 5 and 6 Park Parade shall not be open to customers other than between the hours of 08:00 to 22:00.

Reason: To ensure that the proposed development does not prejudice the enjoyment by neighbouring occupiers of their properties.

- 5 Prior to the first use of 5 and 6 Park Parade as an adult gaming centre hereby approved, a scheme of sound insulation measures shall be submitted to and approved in writing by the local planning authority. The insulation shall be designed so that noise from the adult gaming centre use does not result in an exceedance of the indoor ambient noise levels specified within BS8233:2014 'Guidance on sound insulation and noise reduction for buildings' in the flats above and adjacent to the uses. The approved insulation measures shall thereafter be implemented prior to the first use of 5 and 6 Park Parade.'

Reason: To minimise noise transference in the interest of residential amenity.

INFORMATIVES

- 1 Any forthcoming signage would be required to obtain Advertisement Consent.

Any person wishing to inspect the above papers should contact Sarah Dilley, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 2500