

21 March 2016

Planning Application APP/16/00182 – Betfred Betting Shop Relocation

I wish to lodge an additional detailed objection to the above-noted Planning Application.

While there have already been over 100 individual objections lodged formally against this application, including a preliminary one from myself, there are two specific areas that require further examination.

First, the application is for use of the ground floor of the proposed location only. The upstairs level is currently accessed by an internal staircase which will be removed according to the submitted layout plans. There is no indication as to what will happen to the upper floor nor how access will be obtained. A major organisation which previously expressed interest was told that they would have to be responsible for both floors. Neither the applicants nor the owners have submitted details of how new access to the upper floor would be provided. The plans for the revised layout show that there is no room for stairs and there is no indication of installation of a lift. This means that access would have to be either via an external staircase behind the unit or incorporation of the upper floor into either unit 1 or unit 5. Without alternative access there would be a critical safety exposure in the event of a fire, electrical or water emergency and therefore this application should be rejected until such time as such alternative arrangements for access have been confirmed and, if necessary, a further planning application submitted.

Second, while the applicants should be commended for a detailed analysis of the provisions in the NPPF and the Havant Borough Local Plan as they apply to this application, which will prove of great value to the two councillor-led task forces looking at the future of the Town Centre, the claimed benefits used to justify the application do not in fact so do. Paradoxically, the fact that this application is for a re-location rather than a new development actually weakens the case further.

The applicants claim that this proposal meets all three primary criteria in the NPPF – economic, social and environmental. There is clearly no environmental contribution made by the proposal and it is patently clear that a betting shop provides little or no meaningful social benefit; indeed, the overwhelming level of opposition suggests the opposite. Further, it is clear that users of the existing business also make use of the Wellington Public House and should it move to the centre of the town it must be concluded, in the absence of any consultee response from Hampshire Constabulary to the contrary, there is a heightened risk of anti-social behaviour in the northern end of the London Road precinct up to the Denmead Queen and the Heroes of Waterlooville.

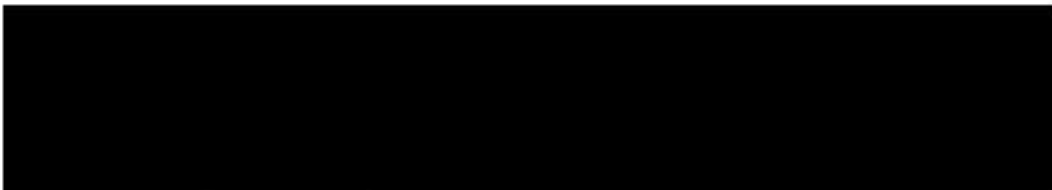
This leaves only the claim for economic benefit. Had this been a proposal for an entirely new business then both the arguments presented and the case studies submitted in what would appear to be a warning against potential costs at appeal might be relevant. The referenced appeals relate to already-thriving commercial developments where a new betting shop would have less impact on the overall mix but clearly this does not apply to Waterlooville Town Centre and we believe that a refusal could therefore be defended against any appeal.

However, it is not the case that this is new business, but is simply the repositioning of an existing one. The question is therefore whether greater benefit would arise than from any already resulting from the present location. The existing business has been established for some time but the applicants have failed to provide any comparable benefit analysis and there is no obvious beneficial result to be seen in the area of its current location from its presence.

The only new business - a specialist clothing shop - to open recently, other than estate agencies, is clearly not as a result of betting shop customer trade! The applicants also claim that this proposal will fill an otherwise empty unit which is correct, but also claim that will be a net gain, which is much less likely. The applicants have pledged not to allow the existing property to be used for a further betting shop, which indicates that they are retaining the lease. But attempts to market property in this part of the London Road have proved very difficult and there is no guarantee that they will be successful. They also claim that they will increase employment but at best it would be negligible and in the short term non-existent.

I would ask you to at least defer consideration until the first point above is resolved, either by the applicant or the owner of the property and its neighbours, and to refuse consent altogether on the second point as not being in the interests of either the residents or the long-term plans for the Town Centre.

Yours faithfully,



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