

Units 21/22 Harpurhey Shopping Centre, Lee Road, Harpurhey, M9 4DH
LOL Bingo
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PLANNING SUPPORT STATEMENT
PROPOSED CHANGE OF USE OF EXISTING
VACANT BETTING SHOP TO BINGO CLUB
WITH ANCILLARY AMUSEMENTS AND
REPLACEMENT SIGNAGE

1.0 Introduction

1.1 This Planning Support Statement has been prepared to accompany an application for planning permission for the proposed change of use of these vacant betting shop premises to a Bingo club use with ancillary amusement machines, at Units 21/22 Harpurhey Shopping Centre, Lee Road, Harpurhey, M9 4DH. The associated change in external signage also forms part of this conjoined application for planning permission and advertisement consent.

1.2 The Statement is set out in seven sections and comprises:

- 1.0 Introduction
- 2.0 Site Description & Surrounding Area
- 3.0 Proposals & Planning History
- 4.0 Relevant Planning Policies
- 5.0 Licensing Controls
- 6.0 Assessment of Planning Issues
- 7.0 Summary

2.0 Site Description & Surrounding Area

- 2.1 The application site itself comprises two units within a large, modern, multi-unit two-storey brick built building. The main vehicular entrance drive into the shopping centre lies to the immediate north and the large Harpurhey surface car park immediately to the north east. The units have previously been used as a Coral betting shop, which closed by March 2021.
- 2.2 The application site fronts the busy Walter Street service road with the principal Moston Lane to the north. The local area is characterised by a lively mix of retail and typical town centre commercial uses. There are no residential properties in the immediate vicinity of the site.
- 2.3 The application site is sustainably located within a local centre with strong transport links. There are a number bus stops in the immediate vicinity along Moston Lane, Rochdale Road and Church Lane.
- 2.4 The site does not lie within a designated conservation area and is situated within a low risk flood zone.

3.0 Proposals & Planning History

- 3.1 This planning application proposes the proposed change of use of these vacant betting shop premises to a Bingo club use with ancillary amusement machines, with the display of a replacement fascia sign and a replacement projecting sign.
- 3.2 A detailed description of the proposed operation is contained within the enclosed LOL Bingo presentation brochure. This is a digitalised, centrally located local community concept which seeks to replace the conventional edge of town bingo hall operation.
- 3.3 The internal layout of the site will be reconfigured to accommodate the principal large seating area for bingo players, as well as an area for electronic amusement machines, a counter, customer toilets and a staff office with staff toilet.
- 3.4 Materially, there would be minimal differences between the former betting shop use and the proposed bingo club. Both would have staffed and electronic gaming facilities, together with ancillary food and beverage facilities.
- 3.5 The proposed use will require additional staffing, thereby helping to generate additional employment at the site. The applicant's operational management procedures accompany this planning application (see enclosed presentation brochure and Local Area Risk Assessment), and these cover the intended management regime for the proposed use. As addressed below in Section 5.0, all of these detailed site management matters are already fully covered by the requirements of the licensing legislation and Manchester City Council, as licensing authority, will retain full control over such detailed site management measures, regardless of the planning position. With these recourse controls appropriately addressed by the licensing legislation, there is no need for the LPA to seek to replicate these controls.
- 3.6 The site has more than ample car parking in the immediate vicinity to incorporate the parking requirements of the proposed use. In addition, the site is sustainably located, with easy access to local bus services and with taxi ranks nearby.
- 3.7 The proposed advertisements comprise an internally illuminated fascia sign and an internally illuminated project sign. This type of signage is prevalent on neighbouring properties and throughout the shopping centre.
- 3.8 There is no relevant planning history for the site. However, the applicant notes the grant of advertisement consent in January 2017 for the display of an internally illuminated fascia sign and an internally illuminated projecting sign at Unit 14 of Harpurhey Shopping Centre (LPA Ref: 11454/AO/2016).

4.0 Relevant Planning Policy

National Planning Policy Framework 2021

- 4.1 The 2021 Framework reiterates the presumption in favour of sustainable development (paragraph 11) which requires development proposals that accord with an up-to-date development plan to be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless in conflict with the 2021 Framework. The 2021 Framework also requires LPAs to approach decisions on proposed development in a positive and creative way and to work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible (all paragraph 38).
- 4.2 The 2021 Framework requires planning policies and decisions to help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (paragraph 81).
- 4.3 The 2021 Framework requires planning policies and decisions to promote social interaction and opportunities for meetings between people who might not otherwise come into contact with each other (paragraph 92). The 2021 Framework adds that in order to provide the social and recreational facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared spaces and meeting places, such as public houses (paragraph 93).
- 4.4 The 2021 Framework states that good design is a key aspect of sustainable development (paragraph 126). Planning policies and decisions should ensure that developments function well and add to the overall quality of the area; are visually attractive; are sympathetic to local character and history, while not preventing or discouraging appropriate innovation or change; create attractive, welcoming and distinctive places; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks; and create safe, inclusive and accessible places that do not undermine the quality of life or community cohesion and resilience (all paragraph 130).

Development Plan Policies

- 4.5 The Development Plan for Manchester comprises the Manchester Core Strategy 2012-2027. Principal relevant policies comprise Policy C3 (North Manchester District Centres – Cheetham Hill and Harpurhey) and Policy CC4 (Visitors – Tourism, Culture and Leisure).

- 4.6 Policy C3 states that redevelopment within Harpurhey District Centre has the potential to provide increased retail floorspace alongside additional uses, including food and drink, employment and community facilities. Supporting paragraph 10.23 encourages improvements to shops and services in Harpurhey.
- 4.7 Policy CC4 states that proposals to improve the appearance, use and accessibility of all cultural and visitor attractions and associated facilities will be supported. Development that improves facilities for visitors and residents will be promoted.

Supplementary Planning Guidance/Documents

- 4.8 The Guide to Development in Manchester Supplementary Planning Document and Planning Guidance (MSPD) was adopted in April 2007 and so is out of date with the current NPPF. Nevertheless, it contains certain objectives for development in Manchester that remain relevant today.
- 4.9 MSPD paragraph 2.47 encourages a variety and mix of land and building uses. Paragraph 2.48 states that shops and public facilities should be located within local centres. Paragraph 2.54 states that conversion of existing buildings is actively encouraged.
- 4.10 MSPD Paragraph 11.25 states that district and local centres should accommodate a range of facilities and services, not simply shops and hot food premises. Mixed uses will be encouraged.

Advertisements

- 4.11 The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 require the Local Planning Authority to only consider two issues with regard to advertisements; namely the interests of amenity and public safety. This is also replicated within para 136 of the NPPF (2021) which states that “*Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.*”
- 4.12 The 2021 Framework states that the control of advertisements should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts (all paragraph 132).
- 4.13 In considering the impact on amenity, the effect of the adverts on the appearance of the immediate neighbourhood, where residents or passers-by will be aware of the advertisement, must be taken into account.

5.0 Licensing Controls

- 5.1 Since 2000, Central Government has advocated a more relaxed licensing regime in order to encourage flexibility to licensed operators, more freedom of choice and a means of addressing and reducing the impact of binge drinking. The Government White Paper 'Time for Reform: proposals for the modernization of our licensing laws' (April 2000) sets out formal proposals for modernizing and integrating the alcohol, public entertainment and associated late night leisure licensing systems in England and Wales in order to encourage a strategy for 24-hour living in Town Centres.
- 5.2 The White Paper was followed by The Licensing Bill, introduced in Parliament in November 2002. On 10 July 2003, the Bill received Royal Assent, becoming the Licensing Act 2003. This was followed by Guidance from the Secretary of State for the Department of Culture, Media & Sport (DCMS) under Section 182 of the 2003 Act. The Guidance amplifies the meaning of the Act and is a statutory document to which licensing authorities must have regard when considering both their licensing policies and individual applications for new licences. There are four fundamental licensing objectives underpinning everything within the Act:
- i) The prevention of crime and disorder;
 - ii) Public safety;
 - iii) The prevention of public nuisance; and
 - iv) The protection of children from harm.
- 5.3 The Secretary of State for DCMS also produced an explanatory letter to accompany the Guidance. The letter explains that the 2003 Act "provides a genuine opportunity for the local development of our rich culture of live music, dancing and the arts. These, and other forms of entertainment, provide a diversity of activities for local people and visitors, help invigorate the leisure and night time economy and provide pursuits for young people that are not based around drinking".
- 5.4 In accordance with the Licensing Act 2003, Local authorities have a statutory duty to publish a licensing policy dealing with how they will promote the licensing objectives in their area. In producing this they must consult widely with other statutory authorities, the Police, the Fire Authority and the local community.
- 5.5 Manchester City Council (as Licensing Authority) has published and adopted a statutory Licensing Policy. The Council's policy confirms the four licensing objectives as the prevention of crime and disorder, public safety, the prevention of public nuisance and the protection of children from harm.
- 5.6 It is important to note that the application site requires a premises licence for all licensable activities taking place and a gaming licence, which will control the use at the site.

- 5.7 The operational and management conditions imposed by Manchester City Council on the applicant's proposed bingo use, through the licensing legislation, will cover a wide range of issues. These will include the full range of detailed site management matters, including the opening hours of the premises and the hours that licensable activities can take place; as well as any site-specific security requirements.
- 5.8 Both the Licensing Act 2003 and the Council's own Licensing Policy are material considerations in the determination of planning applications. There is no reason to consider that these controls cannot be effective at the application site. These controls offer comfort to local residents, businesses and the local planning authority.

6.0 Assessment of Planning Issues

- 6.1 The proposed bingo use would introduce an appropriate town centre use that would attract pedestrian footfall, which would complement and support the leisure function of these premises and this local centre in general. The proposed bingo use would enhance the vitality and viability of the local centre. The scale and nature of the proposed bingo use will also complement the function and character of the local centre. Indeed, the proposed use will help diversify and enhance the vitality and viability of the centre, which is sustainably located close to a number of transport options. The requirements of the 2021 Framework and the aims and aspirations of Manchester Core Strategy are therefore met by the application proposal.
- 6.2 The prime measure of the vitality of an urban centre is the number of people attracted to it at different times of the day and evening. The proposed bingo use will enhance and diversify the existing commercial leisure use of these premises, which would help attract customers to the site and the wider local centre in general. These customers will increase their time spent at the site and will increase their dwell times within the local centre. It is highly probable that many customers will combine their visit to the proposed bingo club with other trips into the local centre, whether for work, leisure or shopping purposes. The character and function of local centre would be enhanced through a wider mix of uses, including commercial leisure uses such as this.
- 6.3 The proposed use will require additional staffing, thereby helping to generate additional employment at the site. This employment generation and economic activity would be a material benefit of the proposed use, enhancing and diversifying the commercial leisure use of the premises for a further active and appropriate town centre use. In addition to the direct economic benefit from the employment of additional staff at these premises, the proposed use would again enhance the vitality and viability of the local centre, as stated above, through the increased pedestrian footfall and the increased dwell-times and customer spend; in association with the increased potential in linked trips with work, shopping and leisure activities, as well as the employment benefits for local suppliers and head office staff etc. The proposed use would therefore be to the benefit of other operators within the immediate and surrounding area and the local economy as a whole.
- 6.4 The proposed use will represent an alternative, well-managed, commercial leisure use within these existing commercial premises, that would provide enhanced alternative leisure facilities within the locality.
- 6.5 As addressed above in Section 5.0, detailed site management matters are already fully covered by the requirements of the licensing legislation and Manchester City Council will retain full control over such detailed site management measures, regardless of the planning position. With these recourse controls already appropriately addressed by the licensing legislation, there is no need for

the LPA to seek to replicate these controls. The Licensing Authority will regulate activity at the site to ensure the prevention of public nuisance and anti-social behaviour. It is not anticipated that there would be any detrimental implications for the local area. However, the Environmental Protection legislation also affords local authorities considerable and wide-ranging powers to address any incidents of noise disturbance, not that this is in any way anticipated at the application site.

- 6.6 Taking all of the above into account, it is clear that the proposed use is fully in compliance with the aims and aspirations of the relevant national and local planning policies rehearsed above. The application proposals would result in a complementary mixed commercial leisure use of these existing commercial premises and this would improve the attractiveness of this local centre and would help to diversify its evening economy and leisure function; ensuring that this area remains vibrant, attractive and accessible to all throughout the day and evening. The application proposals would also directly enhance social infrastructure provision within a highly accessible location. In accordance with the 2021 Framework's presumption in favour of sustainable development, this planning application should be approved without delay.
- 6.7 It is also considered that the signage proposals do not conflict with any relevant adopted local planning policy for this site.
- 6.8 The proposed signage scheme will be essentially ephemeral in nature and will not result in any significant or material impacts upon the character and appearance of the host building and it is considered to be appropriate in nature and scale.
- 6.9 Illumination of elements of the proposed replacement signage scheme is considered to be both reasonable and justified for the premises, given the trading hours and the nature of the applicant's business, which includes evening and night-time trade. Furthermore, the existing signage already lawfully installed on the building and on other buildings in the locality includes the same method of illumination.
- 6.10 The relevant considerations for determining proposals for advertisement consent comprise visual amenity and public safety only. Visual amenity is not only related to the aesthetics of the specific signage, but must relate to visual considerations of the surrounding area, including any detriment caused by loss of investment to commercial buildings and their external appearance. The 2021 Framework is clear that the control of advertisements should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.
- 6.11 The signage proposal is an essential part of the applicant's strategy to attract custom to ensure the economic viability of this commercial social and leisure facility. The signage is necessary in order to help attract custom for the new venture and facilitate the continuing economic health of the beneficial use of these premises for its appropriate town centre use. The proposed signage

scheme would help to facilitate the appropriate new use of these premises for a use which will continue to add to and enhance the vitality and pedestrian footfall within the local street scene.

- 6.12 Given its positioning along Lee Road, the signage will be clearly visible to pedestrians and other road users. However, the fascia signage and projecting sign have been designed to sit within the rhythm of the existing façade and is in keeping with the existing commercial character and other signage schemes in the vicinity.
- 6.13 The proposed lighting will be discrete, and the size of the lettering is in proportion to the detailing elsewhere on the building, ensuring that there would be no harm in this regard. The materials and colours will also be compatible with the character of the street. With this in mind, the signage is not considered to look out of place and will not result in any harm to the character of the area.
- 6.14 In considering public safety, the impact of the signs on the safe use and operation of any form of traffic or transport including the safety of pedestrians, must be taken into account. The behaviour of drivers of vehicles who would see the advertisement must be considered and regard made, to the possible confusion with traffic or other signals. The Institution of Lighting Engineers Technical Report Number 5: Brightness of Illuminated Advertisements (2001) provides guidance for maximum luminance and suggests that in city centre locations, with high levels of night time activity, illuminated areas up to 10m² should have a maximum luminance level of 600 cd/m². The adverts will be c200 cd/m² and therefore the brightness would not distract road users.
- 6.15 The advertisements would not cause harm to the safety of pedestrians. There are also no highway signs which the proposal may interfere with and the proposal is not considered to have an adverse impact on the safety and operation of the adjoining public highway.

7.0 Summary

- 7.1 The proposed bingo use will introduce an appropriate use into these commercial premises, for an appropriate town centre use that would attract pedestrian footfall and would complement and support the leisure function of the local centre in general. It is therefore considered that the proposed use will support the character and function of the local centre.
- 7.2 The scale and nature of the proposed use will not result in any material, detrimental impact on the function and character of the local centre itself, but will help diversify and enhance the vitality and viability of the local centre.
- 7.3 The application proposal is located within a principal urban area, utilising an existing vacant building in a sustainable location. The proposed use will maintain and enhance the vitality and viability of this local centre, commensurate with its role and function.
- 7.4 The prime measure of the vitality of an urban centre is the number of people attracted to it at different times of the day and evening. The proposed use will enhance and diversify the existing commercial leisure use of these premises, which would help attract customers to the site and the wider local centre in general. These customers will increase their time spent at the site and will increase their dwell times within the local centre. It is highly probable that many customers will combine their visit to the proposed bingo club with other trips into the local centre.
- 7.5 The character and function of local centre will be enhanced through a wider mix of uses, including commercial leisure uses such as this. This new use will attract a significant number of customers throughout the daytime and into the evening, helping to diversify this part of the local centre.
- 7.5 The proposed use will require additional staffing, thereby helping to generate additional employment at the site. This employment generation and economic activity would be a material benefit of the proposed use, enhancing and diversifying the commercial leisure use of the premises for a further active and appropriate town centre use.
- 7.6 All of the detailed site management matters are already fully covered by the requirements of the licensing legislation and Manchester City Council will retain full control over such detailed site management measures, regardless of the planning position. There is no need for the LPA to seek to replicate these controls. The licensing regime is also part of the suite of statutory control measures that will be exercised over the operation of the premises by Manchester City Council. The Licensing Authority will regulate activity at the site to ensure the prevention of public nuisance and anti-social behaviour. It is not anticipated that there would be any detrimental implications for the local area. However, the Environmental Protection legislation also affords local authorities considerable and wide-ranging powers to address any incidents of noise disturbance, not that this is in any way anticipated at the application site.

- 7.7 The site is sustainably located, with easy access to local bus and train services and with a large public car park in the very close vicinity. There would be no demonstrable harm caused to the local transportation network as a consequence of the proposed use.
- 7.8 The proposed signage scheme will be essentially ephemeral in nature and will not result in any significant or material impacts upon the character and appearance of the host building and it is considered to be appropriate in nature and scale. It is considered that the proposed replacement signage would not result in harm to visual amenity or public safety. The signage proposal will help ensure the continued economic use of this site and its continued function as an appropriate commercial leisure use, which adds to the vitality and viability of the local area in general without compromising the visual amenities of the wider area.
- 7.9 Taking all of the above into account, it is clear that the proposed use and its signage are fully in compliance with the aims and aspirations of the relevant national and local planning policies. The application proposal will result in a complementary mixed commercial leisure use of these existing commercial premises and this would improve the attractiveness of this local centre and would help to diversify its evening economy and leisure function.

