# Merkur Slots Planning Application Concerns: Longsight District Centre

As a Manchester resident who has personally struggled with gambling addiction, I'm deeply concerned about the Merkur Slots application for 537 Stockport Road in Longsight. This document examines several serious issues with their application, including contradictions between their planning and licensing materials, the worrying concentration of gambling venues in our area, and the risks to vulnerable people in Longsight, an area with high deprivation.

A particular concern is how Adult Gaming Centres like this often lack the safeguards found in online gambling. In my experience, physical venues don't require registration, ID verification, or maintain the same level of monitoring that online platforms are required to implement. They often allow extended play without the intervention that would happen online.

This document analyzes the planning application for Merkur Slots at 537 Stockport Road in Longsight, Manchester, highlighting significant contradictions between their planning application and premises license hearing, as well as examining the concentration of gambling venues in a deprived area.

## Introduction

The planning application by Merkur Slots wants to change 537 Stockport Road from a vacant bank to an Adult Gaming Centre (AGC). Having lived in Manchester and dealt with the impacts of gambling venues in our community, I want to raise several concerns:

1. There are alarming contradictions between what they told planning versus licensing
2. Longsight already has too many gambling venues concentrated in a small area
3. This is a high deprivation area where vulnerable residents would be at greater risk
4. I'm worried about their plan to potentially expand gambling into the first floor later

As someone who has experienced gambling addiction, I know firsthand how venues like this can impact vulnerable people in our community, especially in areas already struggling with poverty and limited options.

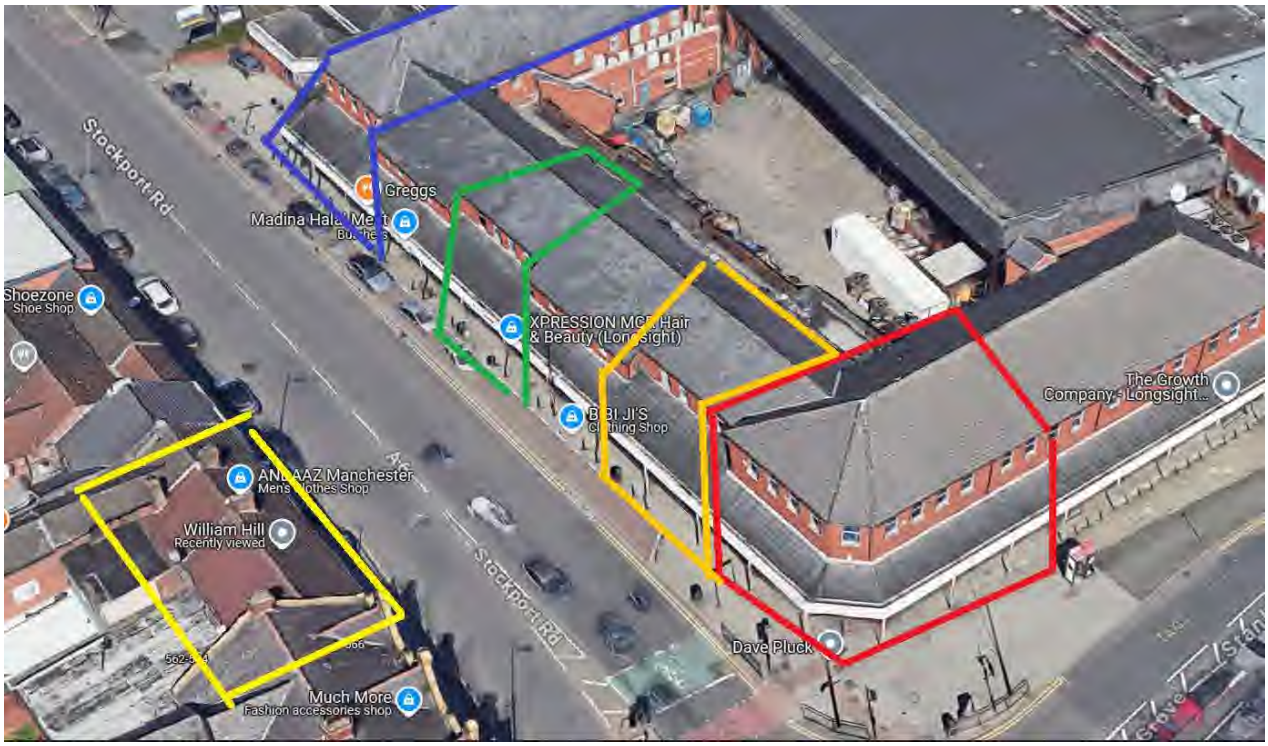
## My Personal Experience with Gambling Venues

As someone who has struggled with gambling addiction, I want to share my perspective on why this application concerns me. While online gambling sites have implemented increasingly robust safeguards over the years (including mandatory ID verification, cooling-off periods, spending limits, and self-exclusion programs that work across multiple sites), my experience with physical AGCs has been very different:

- No ID verification is required to enter or play at most AGCs
- No registration is needed, making it impossible to track patterns of problematic play
- Staff intervention is minimal and often only occurs at the point of visible distress
- It's possible to move between different physical venues in the same area without any tracking
- Self-exclusion is difficult to enforce as it relies on staff remembering faces

Many times, I've been able to enter an AGC and gamble extensively without anyone asking my name or checking if I was on a self-exclusion register. These venues know that people with addiction issues are a significant source of their revenue, and the safeguards simply aren't robust enough.

## Area Context & Concentration of Gambling Venues




The above image clearly shows:

- Blue square: Proposed Merkur Slots location
- Green square: Pawnbroker (subprime lending)
- Yellow squares: Existing betting shops (Paddy Power and William Hill)
- Red square: David Pluck (another gambling venue)

Despite claims in the planning application that "there are no other Adult Gaming Centres in the immediate vicinity" and that "the change of use will not lead to a concentration of similar uses," the visual evidence demonstrates:

1. This would be the FOURTH gambling venue within this small shopping center
2. Gambling venues would occupy a significant percentage of the Longsight District Centre frontage
3. The proximity of a pawnbroker adds another financial service targeting vulnerable populations

## Concerns About First Floor Space and Future Expansion

The planning application states:

> "The proposals concern the ground and first floor of 537 Stockport Road seeking the change of use from a vacant bank (Class E) to an AGC (Sui Generis). The customer/trading space will be on the ground floor only. The first floor will be used for ancillary storage space and for staff."

This representation of the first-floor space raises significant concerns:

1. **Precedent for Expansion**: Between November and December 2024, the Merkur premises in Stockport underwent substantial alterations that included installing a solid

wall through the venue to change the premise configuration, allowing for a considerable number of additional gambling machines.

2. **Risk of Future Application**: The large amount of first-floor retail space being designated as "ancillary storage" and "staff areas" appears disproportionate to the operational needs of the ground floor gaming center.

3. **Planned Future Action**: There is legitimate concern that, once planning permission is secured, the company may follow the same pattern as their Stockport location by submitting further applications to convert this "storage space" into additional gambling areas.

4. **Incremental Expansion Strategy**: This approach of securing initial permission with limited scope followed by subsequent applications for expansion appears to be a tactical approach to gaining approval for what might otherwise face stronger opposition if proposed in full initially.

## Ongoing Regulatory Issues

It should be noted that the Stockport Merkur venue is currently under Gambling Commission investigation again, according to a recent Guardian article (May 2025) which discusses how gambling firms are adopting aggressive tactics to expand 24-hour slot machine operations in towns across the UK.

This follows the same Stockport premises receiving a fine in February 2025 for social responsibility failures, as reported by iGaming Business.

This pattern of regulatory issues combined with expansion tactics raises serious questions about whether the current application truthfully represents the applicant's medium-term intentions for the premises.

# Key Contradictions Between Planning & Licensing Applications

Meeting of Licensing Sub Committee Hearing Panel, Wednesday, 2nd April, 2025 10.00 am (Item 24.)
https://democracy.manchester.gov.uk/mgAi.aspx?ID=16429

| **Planning Application** | **Licensing Hearing Minutes** | **Contradiction** |
|---|---|---|
| Presented as an Adult Gaming Centre (AGC) | Applied for a Bingo Premises license | **Fundamental difference in regulatory framework** |
| Heavy emphasis on gaming machines with minimal mention of bingo | Committee required: "Bingo facilities must be prominent upon entry to the premises and be the first terminals that can be accessed" | **Misleading representation of primary business activity** |
| No mention of compliance issues or regulatory problems | Direct reference to "the fine from the Gambling Commission" at their Stockport store and conditions "not adhered to at the Deansgate store" | **Omission of relevant regulatory history** |
| Vague about staffing levels | Required: "There shall be two members of staff at the premises at all times except in the case of an emergency" | **Committee identified staffing as a vulnerability requiring specific conditions** |
| Proposed "25% Vinyl to the glazing," "TV Screens," and "Posterboards" | Restricted: "One single poster advertising bingo only/bingo images shall be posted externally. No other external advertising/signage shall be displayed" | **Significantly different presentations regarding exterior appearance** |
| Claims operation until midnight would have no impact | Restricted hours to 8am-12am (from requested 24-hour operation) | **Committee identified concerns with extended hours** |

# Analysis of Claims in Planning Application

## Claim: "The proposals will bring a vacant unit back into beneficial/commercial use"

**Reality**: While technically true, this ignores the fact that, as stated in their own application, "The District Centre does not have empty units for long" - indicating that other more diverse commercial uses would likely occupy this space.

## Claim: "The principal benefit of the AGC would be the complementary nature of its use alongside the other uses in the retail cluster"

**Reality**: Adding a fourth gambling venue alongside a pawnbroker creates a concentration of similar services rather than complementary diversity.

## Claim: "AGCs are established main town centre uses and are regarded as uses that complement retail and service uses"

**Reality**: While individual venues might complement retail, the concentration of four gambling venues undermines retail diversity.

## Claim: "The proposed AGC will bring a vacant unit which has not been contributing to the local economy back into use"

**Reality**: This ignores the Committee's finding that "The District Centre does not have empty units for long so if the application was refused, it was felt something else would come along that was more appropriate."

## Claim: "Merkur AGCs attract people into centres, generate good levels of footfall, maintain high levels of pedestrian flow and generate linked trips"

**Reality**: The licensing committee heard significant concerns from Public Health and local councillors about harm to vulnerable populations, contradicting the portrayal of these venues as beneficial to community vitality.

## Claim: "The proposals have been amended in line with recommendations put forward by the EHO and are now acceptable"

**Reality**: While the Environmental Health Officer may have accepted the noise mitigation proposals, the licensing committee still found it necessary to impose additional restrictions beyond those agreed with the EHO, indicating continuing concerns.

### Claim: "The policies and procedures in place [are] strong and comprehensive"

**Reality**: The licensing committee explicitly noted: "The Panel did have concerns about the effectiveness of the Premises in protecting vulnerable people and children from gambling harm. The Panel noted the fine from the Gambling Commission was as a result of staff failing to implement policies and procedures, although still felt the applicant had failed in its duty to minimise risk."

## B2 vs B3 Gaming Machines Technical Distinction

The application makes a point that "AGCs do not have (and have never had) the Fixed Odds Betting Terminals that betting shops had." This statement is:

1. Technically correct but misleading
2. Relies on outdated distinctions that no longer apply

Key facts:

- B2 FOBTs (in betting shops) and B3 machines (in AGCs) now both have the same £2 maximum stake
- Both have the same £500 maximum prize
- The core differences are primarily just in game types and technical classification
- The application leverages the historical negative reputation of FOBTs (from when they allowed £100 stakes) to position their AGC as a "better alternative"

## Public Health and Community Concerns

Local objections highlighted:

- Area's high deprivation levels
- Large youth population
- Cultural sensitivities (particularly in Muslim communities)
- Existing anti-social behavior concerns
- Already high saturation of gambling venues

Public Health's testimony noted:

- "One in fifteen Manchester residents were said to have been affected by gambling related harms"
- Particular vulnerability of high deprivation areas
- Past failures of the operator to adhere to conditions

## Conclusion

The planning application for Merkur Slots at 537 Stockport Road presents a misleading picture that contradicts what they've said in their premises license hearing. Adding a fourth gambling venue to Longsight's shopping center would create a harmful concentration of betting shops and gaming centers in an area already struggling with deprivation.

As someone who has personally struggled with gambling addiction, I know the harm these venues can cause when they cluster in vulnerable communities. The lack of robust safeguards in physical venues compared to online gambling makes them particularly concerning.

Merkur's history of regulatory problems and their pattern of expanding gambling space after initial approval should make us question their intentions for the first floor of this property. Their claims about bringing benefits to our community don't match the reality of what gambling venues actually contribute to areas like Longsight.

I urge the planning committee to reject this application and protect our community from the further concentration of gambling venues targeting our most vulnerable residents.

Outlook

**Objection to proposed Merkur Slots, Longsight**

**From** [redacted]
**Date** Fri 23.5.25 3:55 PM
**To** Sue Wills <[redacted]

You don't often get email from [redacted] Learn why this is important

**ALERT** This message originated outside of the Manchester City Council network. **BE CAUTIOUS** before clicking any links or opening any attachments. Please remember your Cyber Training and report anything suspicious.

Good afternoon,

I would like to formally object to the proposed Merkur Slots venue at 537 Stockport Road, Longsight.

This area already has 3 gambling venues within yards of the proposed Merkur site.

In their application, Merkur state that they don't have FOBTS in their stores. This is to give the impression that there is a difference between FOBTS and the high stake B3 machines in their stores. Since the rules changed, the maximum stake on a FOBT is £2, exactly the same as a B3 slot machine.

FOBTS are considered the most dangerous gambling products on the market, so much so that betting shops are limited to 4 machines per venue. Adult gaming centres have no such restriction, despite their machines being just as harmful. They are the same machines, often offering the same games. The £2 stake is the same, as is the 2.5 second spin speed.

Permitting this venue would increase the number of gambling machines in this area from the current 12 located in the neighbouring betting shops to approximately 95.

Merkur agreed at the hearing for their licence they do not intend to use this site for bingo, the intention is to open an adult gaming centre.

An adult gaming centre in such close proximity to several other gambling venues would be no benefit to the local community.

Merkur have recently been fined £95,000 by the gambling commission for their social responsibility failings at the Stockport venue. This was due to their behaviour regarding my mum.

Merkur have never apologised for their actions. They refuse to take accountability for their actions, instead chosing to blame the front line staff.

There are very few residents in Longsight who would find it affordable to lose up to £1780 per hour in the proposed establishment. I recently witnessed a customer losing £100 in just 4 minutes. In

an already deprived area, this amount of money leaving the local economy and going directly into the pockets of shareholders would be devastating for residents and local businesses alike.

This business is not appropriate for the area in any way, regardless of the proposed opening hours.

Yours sincerely,

[redacted]

Aaron & Partners
Solicitors

Planning
Growth and Development
Manchester City Council
P O Box 532
Manchester
M60 2LA

Our Ref: BCT.JR.DAV193.24

Your Ref: 142755/FO/2025

Date: 23 May 2025

**By email only:** [redacted]

Dear Sirs

**Application Site: 537 Stockport Road Manchester M12 4JH**
**Application: Change of use from a vacant Class E unit (former Bank) to an Adult Gaming Centre (Sui Generis)**
**Applicant: Merkur Slots Ltd (UK)**

1. We are instructed by [redacted] in relation to the above application. [redacted]

2. Our client has serious concerns about the Application, which are set out in this letter. We shall be grateful if you will please take them into account when considering the Application.

**Relevant legal and policy background.**

3. Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 say that, to the extent that development plan policies are material to an application, the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise.

4. The development plan comprises Core Strategy 2012 – 2027 (the 'Core Strategy'), the saved policies of the Unitary Development Plan (UDP) and various supplementary planning documents.

5. National policy, such as the National Planning Policy Framework ('the NPPF'), is also a material consideration. The relevant policies will be considered below.



Work done by this firm (including consumer credit matters) is authorised and regulated by the Solicitors Regulation Authority (number 401104), except for work done as Insolvency Practitioner (regulated by the Institute for Chartered Accountants in England & Wales in the UK) and notarial work (regulated by the Faculty Office of the Archbishop of Canterbury).

Aaron & Partners LLP is a limited liability partnership registered in England & Wales under Registration Number OC307122. Registered office: Grosvenor Court, Foregate Street, Chester CH1 1HG. The term Partner denotes a senior person. Nobody described as a Partner is a Partner in legal terms. Some, but not all, of those described as Partners are Members of the LLP and a full list of Members is available at the registered office. Service by fax and email not accepted.

Lexcel Practice Management Standard Law Society Accredited
iag
INVESTORS IN PEOPLE

6. **Policy C2** of the Core Strategy states that Development will support thriving district centres, with distinct local character, providing a good range of accessible key services, including retail, health facilities, public services, leisure activities and financial and legal services. It goes on to say that the Council will ensure that provision is made for non-retail uses which make a positive contribution to the vitality and viability of centres.

7. Policy C2 also states that development should contribute positively to the diversity and mix of uses within centres without undermining their primary retail function. Development should also promote a range of retailers and shop formats

8. The reasoned justification to Policy C2 says that the main role of District Centres is access to retail services, and a strong retail offer can underpin other uses. This policy therefore supports the growth of District Centre retail to meet local needs, whilst also promoting a range of other services.

9. The proposed development is located next to Paddy Power at 551-553 Stockport Road and in close proximity to our Client's premises at 555 Stockport Road and William Hill at 562/564 Stockport Road.

10. The Applicant's cover letter states that Adult Gaming Centres ('AGCs') should be differentiated from betting shops on the basis that AGCs do not offer Fixed Odds Betting Terminals ('FOBTs') but instead offer low stakes machines capped at £2. It is important to note that these machines are fundamentally the same as FOBTs offered by betting shops, and that FOBTs have been capped at £2 stake since 2019.

11. This cluster of betting/gambling shops would be detrimental to the retail attraction of the immediate area, in conflict with the retail hierarchy, and would cause a reduction in terms of diversity and mix of uses within Longsight, harming its vitality and ability to meet the needs of local people.

12. The cumulative effect of several betting premises in close proximity would also negatively impact upon the visual interest of the streetscene, further harming the vitality of the area.

13. For the reasons set out above, it is considered that the Application clearly conflicts with Policy C2 and should therefore be refused.

14. **Policy C10** states that role the Council will carefully consider all applications for change of use from A1 retail. Particular attention will be paid to situations where the application relates to units occupying a prime or prominent location within the centre, or units with substantial floorspace or frontage. The policy also states that in areas where there is already a concentration of bars (A4), hot food takeaways (A5) and other night-time uses which are detrimental to the character or vitality and viability of the centre, there will be a presumption against further facilities.

15. The Council is required to take into consideration the cumulative effects of night-time uses and thee impact upon the character of the area. As set out above, there are already three gambling premises in close proximity to the proposed development, and if granted the proposed use would be detrimental to the vitality and viability of the district centre. There is also a cluster of hot food takeaways on Stockport road, close to the application site. The presumption against further facilities is triggered and the Council must therefore refuse the application.

16. **Policy SP1** requires that development in all parts of the city should make a positive contribution to neighbourhoods of choice including enabling all residents to lead healthier lives in safer places with good access to facilities that support health and wellbeing. **Policy DM1** states that all development should have regard to design for health.

17. Paragraph 98 of the NPPF states that planning decisions should enable all residents to lead healthier lives in safer places with good access to facilities that support health and wellbeing.

18. The Applicant was recently investigated and sanctioned by the Gambling Commission in relation to breaches of gambling licence conditions relating to social responsibility, failing to keep its customers safe from harm. This raises concerns about the impact of the proposal upon the health and wellbeing of local residents, and it is submitted that the Application therefore does not accord with Policy DM1, Policy SP1 and the NPPF.

19. **Policy DM1** States that all development should have regard to community safety and crime prevention.

20. Due to the location of the application site on a corner abutting a pedestrian route to the nearby Asda store, it is particularly important that the development supports natural surveillance. However, the limited views from the obscured frontage means that natural surveillance would be limited. This would make the area less attractive to users and detract from the vitality and viability of the locality, in conflict with Policy DM1 and the above-mentioned Policy C2.

21. It is therefore submitted that the proposal is not compliant with local and national policies, and that there are no material considerations which indicate that the Application should not be determined in accordance with the adopted plan. Planning permission should therefore be refused.

Yours faithfully,

[redacted]

[redacted]
Solicitor
For Aaron & Partners LLP
Email: [redacted]

Outlook

**Objection to Proposed Adult Gaming Store 142755/FO/2025**

**From** [redacted]
**Date** Thu 8.5.25 3:35 PM
**To** Sue Wills <[redacted]

[You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification ]

ALERT This message originated outside of the Manchester City Council network. BE CAUTIOUS before clicking any links or opening any attachments. Please remember your Cyber Training and report anything suspicious.

Application Number: 142755/FO/2025

Dear Council or To Whom It May Concern,

I am writing in response to the notice regarding the proposed opening of an adult gaming store in our neighbourhood. I would like to express my strong opposition to this application.

We believe such a business is not in keeping with the character of our community and may attract a rougher crowd, potentially leading to increased noise, anti-social behaviour, and a general decline in the atmosphere and safety of the area. This is not something we want for our neighbourhood, which is home to families, children, and long-standing residents who value a peaceful and respectful environment.

We urge the council to consider the views of the local community and reject this application.

Yours sincerely,
[redacted]