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Planning
Manchester City Council
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September 2024

Our Ref: 24/7644

Dear Sir/Madam

537 Stockport Road, Manchester, M12 4JH

This planning application seeks full planning permission for the change of use of 537 Stockport Road from a vacant Class E unit (former Bank) to an Adult Gaming Centre (AGC) (Sui Generis) (SG) use to allow Merkur Slots Ltd (UK) to occupy the unit.

Application Site and Surroundings

The application site comprises 537 Stockport Road and is situated in a sustainable location within Longsight District Centre. The site is a former Bank (Class E), and the unit has sat vacant since November 2023.

The predominant use of the area is retail however there are a variety of other commercial uses within the centre. The site sits adjacent to McDonalds. It should also that nighttime uses, such as takeaways, are established in the area.

The property is not statutorily or locally listed, and the site does not fall within a conservation area.

Proposals

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 and staff areas.

The first floor will be used as ancillary storage space and for staff.

Access to the unit will remain from the front of the unit (fronting Stockport Road).

Planning Policy Context

Principle of Development

Managing Director
Helen Cuthbert

Directors
Stuart Slatter | Claire Temple | Alastair Close
Dan Templeton | Elliot Jones | Katie Turvey

Consultant
Lorna Byrne

Associate Directors
Heather Vickers | Sam Deegan | Niall Hanrahan | Rob Scadding | Paul Galgey

Associates
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The Development Plan regarding Manchester City Council comprises of the Manchester Core Strategy (July 2012) and saved policies within the Urban Development Plan 1995 (2012) and any relevant supplementary planning documents.

With particular regard to the principle of development, the key policy tests are adopted local policies C1, C2, C10 and C5 of the Manchester Core Strategy.

When analysing core strategy policies C5, it is clear that Longsight is denoted as a district centre whereby the Council are looking to retain and attract visitors to the centre. Policy C2 elaborates on this further, confirming that development will be supported in district centres where proposals for leisure uses make a positive contribution to the vitality and viability of centres.

AGCs are established main town centre uses and are regarded as uses that complement retail and service uses, whilst also contributing to a centre's day-time, evening and night-time economy. The change of use in this instance will ensure that Merkur Slots will contribute towards the vitality and viability of the District Centre as a whole.

Related to this point, Merkur Slots Ltd (UK) commissioned ESA Retail, an independent survey company, to carry out footfall, pedestrian flow and linked trip surveys at three of their trading AGCs across England. The results can be seen via the submitted ESA retail report, which clearly demonstrates that Merkur AGCs are entirely appropriate and complementary uses within primary retail areas and district centres which often have higher footfalls than some traditional retail units. The nature of high streets has changed. Merkur AGCs attract people into centres, generate good levels of footfall, maintain high levels of pedestrian flow and generate linked trips, clearly demonstrating their appropriateness in main frontages within town/district centres.

The principal benefit of the AGC would be the complementary nature of its use alongside the other uses in the retail cluster, and the potential to generate linked trips and to stimulate additional footfall. This would bolster the vitality and viability of the existing composition of retail, sustaining its attractiveness to a wide section of residents, workers and visitors, demonstrating full accordance with local policy C5 and C2.

Policy C10 of the core strategy encourages evening uses that contribute to the vitality of Manchester's Centres, particularly District Centres which have an important role as the focus for the City's evening economy. The considerations for an application of this nature are as follows:

1. Cumulative impact – 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.

2. Residential amenity – the proposed use should not create an unacceptable impact on neighbouring uses in terms of noise, traffic and disturbance.

3. new uses in Manchester centres should support both the day-time and evening/night-time economies whilst not undermining the role of the primary shopping area.

From 01 September 2022, drinking establishments and hot food takeaways were moved from classes A4 and A5, respectively, into Sui Generis. Longsight is a busy district centre, located on a major radial route through central Manchester. Resultingly, the existing composition along Longsight is one that accommodates a number of late-night uses, predominately bars, restaurants and takeaways all of which contribute positively to the vitality and viability of the district centre.

There are no other Adult Gaming Centres in the immediate vicinity application site, nor within the wider District Centre. The applicant does not have an existing AGC in Longsight District Centre, meaning it cannot be argued that there is already a concentration of Sui Generis uses which are detrimental to the character or vitality and viability of the centre. The introduction

of an AGC in a unit that has stood vacant since November 2023 and previously operated as a bank (not a typical retail use) will not harm the character or vitality and viability of Longsight District Centre. If anything, the change of use will achieve long term investment into the unit.

Policy C10 relates to leisure and the evening economy and states, amongst other things, that new uses in Manchester centres should support both the day-time and evening/night-time economies. As mentioned, Longsight currently contains a good mix of uses and the proposal would not lead to a concentration of similar uses. Whilst not a traditional retail use, it would nevertheless attract customers and footfall and contribute to the vitality and viability of this part of the city centre. It would not therefore undermine the function and character of Longsight and the wider District Centre,

Since no AGC's located within Longsight District Centre, this application would not cause a cumulative impact. Further, based on this, the introduction of an AGC in this location would not be detrimental to the character or vitality and viability of the centre, demonstrating compliance with adopted local policy, including criteria set out in policy C10.

It is important to highlight that AGC's are completely dissimilar to a typical betting shop. The submitted Merkur Planning Brochure seeks to address the myths surrounding AGCs and explains how they are different to betting shops. It also includes quotes from noise reports and appeal Inspectors. Merkur Slots Ltd (UK) venues (AGC's) are consistently considered as a leisure/entertainment use, of which, is an accepted Main Town Centre Use and should be noted that AGCs are very different uses both in the way that they operate and their customer base. Public concerns surrounding gambling and betting shops are largely due to the presence of Fixed Odds Betting Terminals (FOBTs). Merkur Slots venues do not offer these types of machines. Merkur Slots' machines offer low stakes ranging from 10p to a maximum of £2.

AGCs are established main town centre uses and are common district centre use that complement retail and service uses and help to contribute to a centres evening and night-time economy. The proposed AGC will bring a vacant unit which has not been contributing to the local economy back into use and return activity to the frontage which is a significant benefit to this part of Longsight District Centre. The introduction of the proposed AGC use will also result in additional benefits, including the redecoration of the existing tired frontage, increased footfall, contributing to linked trips and the creation of 12 new full-time jobs. In this respect, the new use will clearly complement the vitality and vibrancy of the centre, serving the local community within this part of Manchester and will contribute towards the vitality and viability of the centre. As a result, the introduction of an AGC in this location will support day-time and evening economies, whilst not undermining the role of the District Centre.

Active frontage

The proposals will also bring a vacant unit back into active use. When considering adopted Policies C1 and SP1, it is noted that emphasis is placed on the character of areas and the impact vitality and viability. With this in mind, a submitted windows manifestations plan has been submitted and is a move away from the applicant's typical approach to window displays (which includes vinyl to the glazing comprising colourful signage and imagery and tv screens with promotional material and daily news/weather) and comprises a more bespoke approach. For clarity, the proposed display would incorporate the following:

- 25% Vinyl to the glazing (bespoke)
- TV Screens
- Posterboards (Set-back)

This approach has been adopted elsewhere and an example can be seen at Figure 5.1 which shows an existing venue in Plymouth which was allowed at appeal.

Figure 1 – Existing Merkur Slots Venue at 116 New George Street, Plymouth



The Planning Inspector in this case commented as follows:

'The proposal would provide a suitable active frontage that would be beneficial to the character and appearance of the area. It would rectify and repair the harmful effect the empty premises have on the townscape in this location'.

Combined, the window display manifestations plan and the footfall data clearly demonstrate that the propped Merkur Slots AGC will provide an active frontage, via the implementation of an appropriate frontage/window display which maintains visual interest that will clearly add vibrancy, animation and activity to this part of the frontage, demonstrating full compliance with local planning policy

Based on the above, an AGC at this location is in full accordance with local policies the local development plan and the National planning policy, as the change of use will result in use that would remain active and be of visual interest.

Based on the above, an AGC at this location is in full accordance with the council's overarching policies for Longsight District Centre. The proposals will protect and enhance the vitality and vibrancy of this part of the Longsight and the District Centre as a whole.

Amenity

AGCs typically operate 24-hours, and this is proposed for the application site.

It is important to consider that Merkur Slots noise levels are generally very low and impacts on disturbance to surrounding uses are effectively mitigated and minimal. For example, as set out in the submitted brochure, only background music is played within venues (similar to shops) and there are no tannoy systems. Further, the late-night customer base is predominately late shift workers looking to relax and larger groups are very rare due to the offer within the AGCs. As such, the nature of the use proposed would not result in adverse noise in either the day or night-time hours and the use is appropriate to the busy high street context and complies with local plan policy.

Notwithstanding, a worst-case noise assessment has been prepared concluding that there will be no harmful noise impacts from 24-hour operation on the nearest residential premises (15m away) in full accordance with criteria 2 of core strategy policy C10 and Para. 185 of the NPPF, provided the rectification works to the property outlined in the assessment are implemented. These rectification works which relate to noise breakout from the building are outlined in Appendix C of the

submitted noise report. All recommendations will be implemented meaning the limit of NR20 will be achieved and the site would be suitable for 24-hour operation, ensuring compliance with Local Plan policy DM1.

As part of the noise assessment, case studies from 10 other Merkur Venues have been included regarding internal noise levels and external noise levels (comings and goings and noise from patrons smoking outside), demonstrating Merkur Slots customers are typically quiet.

The submitted Merkur Slots brochure also demonstrates the following:

- AGCs do not have (and have never had) the Fixed Odds Betting Terminals that betting shops had
- The machines offer low stakes of between 10p and £2 – the average stake from customers is 30-40p
- Merkur's AGCs offer Bingo
- 48% of customers are female
- A 'Think 25' entrance policy is operated at venues (nobody under 18 years old will be allowed entry)
- Complementary refreshments, teas and coffees are provided
- AGCs are where people go to spend their spare change, have a game of bingo and enjoy their favourite pastime (these machines have been around for many years)
- Customers visit on their own or in couples – large groups are rare
- The customer base after midnight is predominantly the local entertainment workforce and shift workers who like to relax after their busy shifts (hence requirement for flexible hours)
- The machines generate low levels of noise, only background music is played (similar to shops) and there are no tannoy systems
- Merkur Slots have never had an operational licence revoked.

Given the nature of the proposal and the commercial context of the site, 24-hour opening is considered acceptable in this location.

To provide further reassurance, Appendix E of the submitted noise report details an operational management plan. Key measures include:

- The main entrance doors will not be fixed or propped open at any time whilst the premises is trading and there are customers in the venue.
- Customers wishing to smoke will be asked to do so as quickly as possible and in a responsible and quiet manner.
- Individuals who are deemed to be under the influence of excessive alcohol shall not be allowed to enter the premises.
- A notice will be placed that is visible from the exterior of the premises stating that drinking of alcohol directly outside the premises is forbidden and that those who do so will be banned from the premises.
- Customers will be reminded to respect neighbours when they leave.

- Staff, on request, will provide relevant information to customers who require a taxi or directions to the nearest station or bus stop.

The applicant is willing for the OMP to be conditioned as part of any forthcoming decision. Based on the above, proposals are in full accordance with saved policy DC26 and criteria 2 of policy C10 of the Core Strategy.

Conclusion

The principle of the proposed change of use is entirely acceptable in planning terms. The proposals will protect and enhance the vitality and viability of this part the Longsight District Centre. The proposal involves the bringing back of a vacant unit into beneficial/commercial use, which will trigger a number of economic benefits, and will allow an established operator to contribute to the Centre. It has been demonstrated through a detailed noise report that proposed 24-hour opening hours will not lead to any harmful impacts.

The proposals therefore comply with local and national policy, it is therefore respectfully requested that the application is approved without delay in accordance with para 11 of the NPPF.

Application Package

In addition to this cover letter, the following documents are submitted in support of the application. The application fee has been paid via the Planning Portal:

- Completed Application Form and Certificate
- Site Location Plan identifying the application site in red
- Existing and Proposed Floor Plans
- Proposed Display Manifestation Plan
- Noise Assessment prepared by Archo Consulting
- Company Planning Brochure
- ESA Retail Pedestrian Flow, footfall and linked trips data
- Planning Application Fee

We trust that the information submitted is sufficient for the determination of the application and we look forward to receiving confirmation the application has been validated in due course. Should you have any queries, please do not hesitate to contact us.

Yours sincerely,

Planning Potential

Harrogate