



As part of our continued monitoring of emerging local plan documents on behalf of Paddy Power, we have a strong track record of securing amendments to overly onerous draft local plan policies that seek to restrict betting shops, exercising our client's right to be heard.

Limited window of opportunity

Securing amendments to local plans in the early stages of consultation – for example the Issues and Options phase – would attract long odds. However, whilst at this stage the content of a local plan is typically broad, it can often provide an invaluable steer into that particular Local Planning Authority's (LPA) perception of betting shops. Our approach is unabated, until the local plan is adopted or the revisions we seek are incorporated prior to examination during earlier stages of consultation, such as the 'publication' version or the 'submission version'.

We use this time to carry out timely and proportionate activity. Often this means sifting through and analysing the evidence base and other supporting documents and research papers to understand the LPA's rationale behind the policy / supporting information in question. Even then securing revisions isn't a sure thing.

First and foremost, on behalf of Paddy Power, we make it very clear that LPAs are right to scrutinise the concentration of particular uses. However, when we surmise that draft policies impacting betting shop applications are not 'consistent with national policy', nor been 'positively prepared' and are not 'justified' nor 'effective', we recommend to our client that written representations are made.

The argument we present is measured, focused, succinct and substantiated, testament to the successes we have had across the country. The informed and clear case we put forward is predicated on specific evidence demonstrating that the soundness tests and legal requirements have not been met.

Knowing what to look for

An LPA's Retail Study can provide an invaluable insight into the health and prosperity of centres, often where our client is keen to open a new betting shop. From the Retail Study we can glean a number of vital factors that we can use to form cogent arguments, weakening the empirical research that has been conducted. Making our written representation count is fundamental and this is where we really add value. Whether it's evaluating the economic performance of centres, identifying the location of existing betting shops or advocating the rigorous licensing process, we have an ingrained understanding of what LPAs look out for when assessing written representations of this nature.

We collate our own evidence base to build a coherent argument, triggering a debate concerning the, in our view, unjustified claims and subsequent rigid draft policies contained within the policy document.

This has included policies that have:

- Forged a link between the presence of betting shops to the economic and social well-being of residents
- Introduced a threshold policy, limiting the number of betting shops within centres
- Grouped betting shops with pay day loan shops
- Introduced an exclusion zone, prohibiting betting shops in particular location

Home advantage

Planning Potential works across the country and has garnered positive working relationships with many LPAs. The success we have had tells us that our submissions pack a punch having secured sought-after revisions to stringent policies.

We have attended and participated in a number of examination hearings on behalf of Paddy Power, negotiating with both the LPA and Examiner along the way. We have enjoyed a number of achievements - a culmination of hard work, a great deal of research and professional work. These successes have provided a greater certainty for Paddy Power and we have been able to deliver betting shops in locations that seemed, at one stage, a long shot.

We have successfully submitted written representation and/or attended examinations in public concerning the following local plans:

- Nottingham City Council
- Hull City Council
- Leicester City Council (awaiting outcome)
- London Borough of Barking and Dagenham
- London Borough of Brent
- London Borough of Camden
- London Borough of Croydon
- London Borough of Hackney
- London Borough of Hammersmith & Fulham
- London Borough of Haringey
- London Borough of Havering
- London Borough of Hillingdon
- London Borough of Islington
- London Borough of Newham
- London Borough of Redbridge
- Royal Borough of Richmond upon Thames
- London Borough of Southwark
- London Borough of Tower Hamlets

Planning Potential Ltd

Magdalen House
148 Tooley Street
London SE1 2TU
T: 020 7357 8000