

Hillingdon Council  
Planning and Building Control  
Civic Centre  
High Street  
Uxbridge  
UB8 1UW

23 September 2025

Our Ref: 24/7847

Dear Rhian

**Part Ground Floor, 62 Station Road, Hayes**

The purpose of this letter is to pick up all the issues raised so far and hopefully ease progression of the application towards a recommendation for approval. As you know, we have not seen full copies of the of the public comments due to council policy not to share them, but you provided a summary of the key points made in the 12 objections on 01.09.2025. There has only been one consultee objection from Highways which is addressed within this letter. Further information was required by Policy Officers and this information is summarised below. We are pleased to see that the Access Officer, Noise Specialist, Canal & Rivers Trust have all raised no objections.

**Public Comments**

Whilst public feedback is welcomed, there are a considerable number of misconceptions surrounding the AGC use. We have sought to address these below. The key concerns relate to anti-social behaviour, crime, impact on vulnerable people/problem gambling. This is dealt with below. Concerns about there being too many gambling premises is also raised. This is addressed in the section 'Planning Policy Comments' which focuses on Policies DMTC 2 and DMTC 4 which seek to control the number of gambling premises and other town centre uses including takeaways.

*Anti-Social Behaviour/Crime/Problem Gambling*

A common theme from objectors indicates a fear that the change if use would lead to excessive gambling and would give rise to anti-social behaviour, deprivation and the impact on vulnerable people (including young people).

Whilst we appreciate the concern, there is no evidence to support these claims made, nor any that points towards Merkur Slots Ltd having such an impact.

These matters are dealt with in detail by the licensing regime. The three licensing objectives for gambling premises are: preventing gambling from being a source of crime or disorder, being associated with crime and disorder or being used to support crime; ensuring that gambling is conducted in a fair and open way; and protecting children and other vulnerable people

**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**  
Charlotte Hunter | Charlotte Perry | Grace Beeby | Charlotte Parry | Jamie Pert  
Sam Elliott | Katia Clarke | Will Rogers

from being harmed or exploited by gambling. Our client is required to obtain a premises licence under the Gambling Act 2005 and demonstrate compliance with the three licensing objectives. The licensing application has been submitted and is due to be determined next month. The police have not objected to the licence.

Merkur Slots are a responsible operator and has measures and policies in place to ensure compliance with the licensing objectives and to ensure there are no adverse impacts on the amenity of neighbours and the area generally. The submitted planning brochure includes information on the way in which a Merkur Slots operates/the measures and policies they have in place, which include:

- The machines offer low stakes ranging from 10p to a maximum of £2
- Electronic Bingo will be provided as part of the offer
- Complementary refreshments, teas and coffees are provided
- Merkur Slots venues are popular with both males and females
- Customers visit on their own or in couples – large groups are rare (the internal set up internally does not allow groups to congregate around a single machine)
- Unlike betting shops, no live sports events are shown
- The customer base after midnight is predominantly the local 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
- Teams remain with customers on the venue floor rather than behind the counter
- A range of measures are in place to protect customers and the public, including a 'Think 25' policy, annual local area risk assessments, socially responsible gambling tools, and management and training initiatives
- Merkur Slots have never had a licence revoked or reviewed.

We acknowledge that there may be incidences of antisocial behaviour within the area, but no specific evidence has been presented that a well operated Merkur Slots AGC will give rise to significant levels of antisocial behaviour or exacerbate existing issues in the centre. Indeed, as mentioned above, the police have not objected to the licence application.

Respectfully, it would appear that many objectors have not read the submitted brochure.

#### Planning Policy Comments

Planning Policy have advised that Part B(ii) of Policy DMTC2 relates to the whole of the frontage within the secondary shopping area and not just the element of frontage within which an application site is located. They have therefore requested that the whole of the secondary shopping area be surveyed to understand the full composition of the frontage and the proportion of uses listed in Policy DMTC4 (namely hot food takeaways, drinking establishments, betting shops, night clubs, casinos, amusement centres, minicab offices and other similar uses).

Planning Potential have undertaken a survey of the whole secondary shopping area. A total of 116 units were recorded, of which 25 (21.5%) are uses listed within DMTC4. As such, a breach of the 15% threshold already exists. This isn't surprising given these are uses that are typically found in secondary frontages (a 15% threshold is therefore very low/restrictive for such a wide number of traditional secondary frontage uses). It is also odd that there is no threshold for these uses in the primary

shopping area apart from betting shops. The proposals would result in a slight increase to 22.4% (based on the fact that the proposals involve the subdivision of the unit into 2 units which increases the total number of units to 117).

Policy DMTC 2 is all about protecting the vitality and viability of centres and ensuring retail is the predominant use. Paragraph 3.7 of the supporting text states that:

*“Ensuring the viability of Hillingdon’s retail centres by managing their land uses is considered integral to the economic and social prosperity of Hillingdon...However, the Council will consider proposals which constitute a departure from policies in this chapter, where they provide clear and long lasting benefits to the vitality and viability of town centres in the borough”.*

It is firstly important to note that the local plan was adopted in January 2020. Town centres have gone through significant change since then with the Covid pandemic and the subsequent change to the Use Classes Order and the introduction of Class E making it easier for a full range of uses to occupy high street units without the need for planning permission (this includes non-traditional town centre uses). As such, the current policies are based on a different time and are out of date. Secondly, the final sentence of paragraph 3.7 clearly states there is flexibility with the application of the policies/thresholds. We set out below why we consider the proposals will provide long-lasting benefits to the vitality and viability of Hayes Town Centre.

What was clear from the town centre survey is that the secondary shopping area is relatively healthy and operating well despite the existing breach of the 15% threshold for certain uses. 75% (87 units) of the Secondary Shopping Area is in Class E use. There is a well-balanced mix of units throughout the secondary frontage and vacancies are very low. As such, there is nothing to suggest an AGC at the application site would lead to a detrimental impact on the vitality and viability of the secondary shopping area, or indeed the amenity of the area/residents.

**There are no existing gambling premises in the secondary shopping area.** Whilst there are existing gambling premises in the wider centre, none are close to the application site. The nearest gambling premises would be 75 metres away with several intervening uses and a crossroads in between. There will be no physical or visual link between the two. The Merkur Slots will provide healthy competition and form part of the town’s overall offer.

The proposed AGC will bring part of a vacant unit which has not been contributing to the local economy back into use and return activity to the frontage, generating good levels of footfall, pedestrian flows and linked trips (see the footfall survey data submitted with the original application which shows Merkur Slots footfall is often higher than retail units) which is a significant benefit to this part of centre. It will also create 12 new jobs.

A robust marketing letter has been submitted to you on 1<sup>st</sup> August setting out the marketing campaign that has taken place over the last 2 years, demonstrating the unit is unlikely to be occupied by a Class E operator. Operators who enquired stated that the location was off pitch and that the cost of the fit out which would include a new shopfront would be too high. Occupation of one of the newly created units by a national town centre operator will encourage occupation of the remaining part of the unit by a new Class E operator, particularly given a new shopfront to this unit is proposed as part of the application.

As such, there are clear material considerations that outweigh the conflict with the 15% threshold, which is out of date in any event, and it is clear that long-lasting benefits to the vitality and viability of Hayes Town Centre.

#### Highways Officer Comments

Highways have objected to the application on the basis of inadequate cycle parking. Following receipt of these comments, the applicant has proposed cycle parking to the rear of the unit in accordance with guidance contained in the London Cycling Design Standards (see plan ref: 914-PL-109 attached). As a result, proposals are in accordance with London Plan Policy TP5.

With regards to comments regarding the proposed platform lift which will provide wheelchair access and the highways officer's request for the doors to open inwards, the platform lift is for wheelchair use only so the door can only open outwards to allow for adequate space for the wheelchair within the lift. A wheelchair user would simply not be able to use the lift if the door were to open inwards. It is important to note that the lift will not be in frequent use and only part of the door would extend beyond the front building line. Further, a member of staff will be required to assist with the use of the lift as the lift will be locked when not in use. This means there will be a member of staff on the pavement helping customers in and out of the lift, and ensuring there is no conflict with pedestrians when opening the door. The pavement to the front of the unit is wide and therefore there will be plenty of space for pedestrians to still be able to walk past when the lift is in use.

We trust the contents of this letter are helpful and will be given due consideration in the determination of the application which we hope officers will be able to support.

Yours sincerely,

**Planning Potential**

Harrogate

Enc.