

MC/26/0815

Date Received: 30 April 2026
Location: 130 High Street, Gillingham, Medway, ME7 1AS
Proposal: Change of use from shop (Class E) to betting office (Sui Generis).
Applicant Mr D Wilson
Agent Ms Altine Elias
Elias Topping
20 Blythe Way
Solihull
B91 3EY
Ward: Gillingham South
Case Officer: Jacky Olsen
Contact Number: 01634 333056

Recommendation of Officers to the Planning Committee, to be considered and determined by the Planning Committee at a meeting to be held on 29 July 2026.

Recommendation: Refusal

1. The proposed change of use would result in an over-concentration of gambling uses within the High Street that would have a detrimental effect on the retail function of the centre taking into account the proposed unit's prominent location within the centre of the pedestrianised area of the High Street and the proximity to other betting shops/amusement arcades. Furthermore, an additional betting shop on the High Street would have an unacceptable impact on the health and wellbeing of the local community where the local population is vulnerable to gambling due to high levels of deprivation, unemployment and health inequalities of the area. Therefore, the principle of a change of use from retail (Class E) to betting shop (Sui Generis) in this location is not considered acceptable contrary to Policy R17 of the Medway Local Plan 2003, Policies S16, S19 and T27 of the Draft Medway Local Plan 2041 and paragraphs 90 and 96 of the National Planning Policy Framework 2024.

For the reasons for this recommendation for approval please see Planning Appraisal Section and Conclusions at the end of this report.

Proposal

The application seeks permission for a change of use of the property with the pedestrianised High Street of Gillingham from a shop (Class E) to betting office (Sui Generis).

The unit would comprise an entrance, main floorspace comprising a predominantly digital layout with bet stations, football stations, 5 over 5 gantry and fixed odds

betting terminals (FOBTs). In addition, there would be a customer toilet, kiosk and rear staff kitchenette with fire and service exits to the rear.

Relevant Planning History

MC/14/1595	Advertisement consent for 1x internally illuminated fascia sign and 1x internally illuminated projecting sign.	Approval with conditions	30 July 2014
NK3/50/139A	Replacement of existing shop front and minor extension at rear to give inside access to outside WC.	Approval with conditions	12 September 1973
GL/50/139B	Change of use of ground and first floor of 130 High Street, Gillingham to Building Society Branch premises.	Refusal	7 February 1977

Representations

The application has been advertised on site, in the press and by individual neighbour notification to the owners and occupiers of the neighbouring property.

12 letters of representation have been received objecting to the application raising the following concerns:

- Adding to anti-social behaviour and crime in the High Street;
- Over proliferation and concentration of betting shops in the High Street;
- Impact on vitality of the High Street;
- Proximity of schools and colleges to the premises;
- Reduction in diversity of offer on the High Street;
- Transient nature of business;
- The betting shop would further intensify social inequalities;
- Impact on drug use and addiction.

Other matters have been raised, including the impact on school children, but these have not been considered as they are not planning considerations.

A petition has been received with **47 signatures** objecting to the application stating that the relocation and change of use (of the unit) to a larger, more focal point in the High Street will fundamentally impact on the character of the Town Centre.

Retaining a diverse mix of town-centre uses is important to the long-term success of the High Street. Residents are concerned about the long-term decline of their High Street, and are keen to restore pride to the area, including broadening the offer of businesses and services available to residents and visitors.

Councillor McDonald, the Ward Councillor, has objected to the application citing significant concerns regarding the cumulative impact of another gambling premises

on the town centre, local residents, public health, community wellbeing and the wider regeneration aspirations of Gillingham. He particularly highlights the effect of an over-concentration of gambling related uses on a balanced retail offer, on the community through social and economic challenges that run alongside these uses, the undermining of regeneration efforts and the normalisation of gambling activity.

Councillor Louwella Prenter has objected to the application citing concerns in regard to an over concentration of betting shops in the area and the detrimental effect that these have on the High Street including through anti-social behaviour and loitering.

Naushabah Khan, the Member of Parliament for Gillingham and Rainham has objected to the application citing the negative effect on vitality, diversity or long-term regeneration of the High Street. The central location and larger footprint of the relocated betting shop would make it a focal point in the High Street offer fundamentally impacting on the character of the town centre and contrary to the approach to encourage a diverse mix of businesses and services that contribute. The loss of a Class E retail unit may reduce opportunities to attract alternative business to broaden the offer available and an additional gambling premises could have significant consequences for the health and wellbeing of the community through gambling-related harm.

Kent Police have asked for further discussions with the applicant/agent about site specific designing out crime approaches and have provided additional advice with respect to lighting and natural surveillance, alarms, external doors and windows, access control, waste and shutters that could be implemented within the development.

The ***agent for the applicant*** has responded to objections raised and have set out:

- That the application seeks to relocate the existing betting shop and, therefore, the gambling licence will also be relocated;
- The two other betting offices are located to the west of the application site at 118A and 82 High Street and, therefore, the application will not lead to any clustering or dominance of uses within the town centre;
- The survey undertaken designated 3 betting shops out of 144 units including the applicant's current premises totalling 1.74% of the total number of units overall. This figure will remain unchanged as Coral will surrender their gambling licence upon relocating;
- The proposal will not result in the loss of a trading shop as Holland and Barratt vacated in January 2026 and the use will mean the unit is again used;
- The applicant will seek a high quality digital fit out;
- The Secured by Design Officer has not raised objections, and the recommendations will be followed;
- The company's Security and Safety Plan details operational management plan and security measures to stop anti-social behaviour of which staff will be provided a copy;
- Alcohol will be prohibited and a Challenge 25 proof of age scheme will be in place.

Development Plan

The Development Plan for the area comprises the Medway Local Plan 2003 (the Local Plan). The policies referred to within this document and used in the processing of this application have been assessed against the National Planning Policy Framework 2024 (the NPPF) and are generally considered to conform. Where non-conformity exists, this will be highlighted and addressed in the appraisal section below.

The Emerging Local Plan has been agreed by Full Council for Reg 19 publication, consultation and has now been submitted under Regulation 22 to the Planning Inspectorate for examination. The policies within this version of the emerging plan have some weight in the determination of planning (and associated) applications.

Planning Appraisal

Principle

Section 38(6) of the Planning and Compulsory Purchase Act 2004 require applications for planning permission to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Policy R5 of the Local Plan relates to the core area of Gillingham town centre and states that Use Classes A1, A2 and A3 (now Class E) and other uses appropriate to a district centre will be permitted provided they support the vitality and viability of the centre as a whole. At the time the Local Plan was adopted, a betting office was considered to be a Class A2 use and, therefore, this Policy is relevant and is clear in its aim to guide only appropriate uses to the town centre to ensure its vitality and viability.

Policy R17 of the Local Plan deals with A2 and A3 uses and change of use and it states that:

Changes of use within, and on the edge of, the Core Areas of Chatham, Strood, Gillingham, Rainham and Rochester from Class A1 (retail) to A2 (Financial and Professional Services) or A3 (Food and Drink uses) at ground floor level will be permitted except where the addition of such a use within any particular part of the centre would cumulatively have a detrimental effect on the character and retail function of the centre or visual amenity.

Paragraph 90 of the NPPF sets out that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Policies should define the extent of the town centres and primary shopping areas and make clear the range of uses permitted in such locations.

Although not a retail use, the betting shop would still attract footfall to the town centre with staff and customers potentially undertaking linked trips to other shops and services. The hours of opening are proposed to be 08:00 to 22:00 every day and the applicant has provided an analysis of footfall from customer surveys of six Coral

shops from elsewhere in England in October 2015. The locations of the shops surveyed in support of the application are set out below:

- Town Centres – Wellington, Shropshire & Leighton Buzzard, Bedfordshire;
- District Centres – Small Heath, Birmingham & Hedge End, Southampton;
- Local Centres – Woodhall, Welwyn Garden City, Hertfordshire & Grove Park, London.

The survey work was undertaken some 11 years ago when trends were potentially different and shows that most customers (80%) visited at least weekly, usually for less than an hour with 35% saying they would visit other shops in the shopping centre. However, the age of the data is considerable and none of the survey locations seem particularly relevant to Gillingham. The applicant has not provided analysis on whether similar outcomes would be expected from the Gillingham unit or any more up-to-date or locally relevant surveys. Therefore, the survey data is given little weight in the assessment of the application. It is, however, acknowledged that whilst this may not generate the dwell time and follow-on trips that a retail unit might generate, this type of use would introduce more visits and footfall than a vacant unit, which does weigh in its favour.

The unit was vacated by the retailer Holland and Barratt in January 2026. The proposal would, therefore, bring the unit back into active use although it is worth noting that the relocation of the existing betting shop would result in its vacancy which would, therefore, negate the benefit of the proposal in this regard only with a vacant betting shop rather than retail unit. It is also worth noting that the unit has not been a long-term vacant unit that is in need of significant upkeep and, therefore, its occupation by another retailer would be likely.

Policy S16 of the Draft Local Plan seeks to maintain a balanced provision of uses appropriate and reflective of the character, scale and role of the centre. Policy S19 of the Draft Local Plan supports opportunities for diversification and regeneration to enhance the offer including creating opportunities for a greater variety of uses on the High Street that increases dwell time.

The Gillingham Town Centre Masterplan & Delivery Strategy 2019 showed that retailers, shoppers and residents felt that the Town Centre was dominated by betting shops, charity shops and takeaways which were identified as 'not needed'. Anti-social behaviour was also described as a '*massive problem*' where people '*feel uneasy in the High Street with homeless and betting shops.*' The Masterplan concludes that the centre '*has been under-performing for many years and ... needs serious attention.*' The Masterplan highlights the importance of improving the offer from the High Street in terms of a mix of uses, nurturing the town centre's offer and continuing to meet the needs of the local community living closest to the town centre and is a material consideration.

Although Policies S16 and S19 of the Draft Local Plan do not prescribe a quantitative balance between retail and non-retail uses, they both place a strong emphasis on providing a greater variety of uses on the high street that increase dwell time and do not have a detrimental effect on the retail function of the centre. Given its prominent

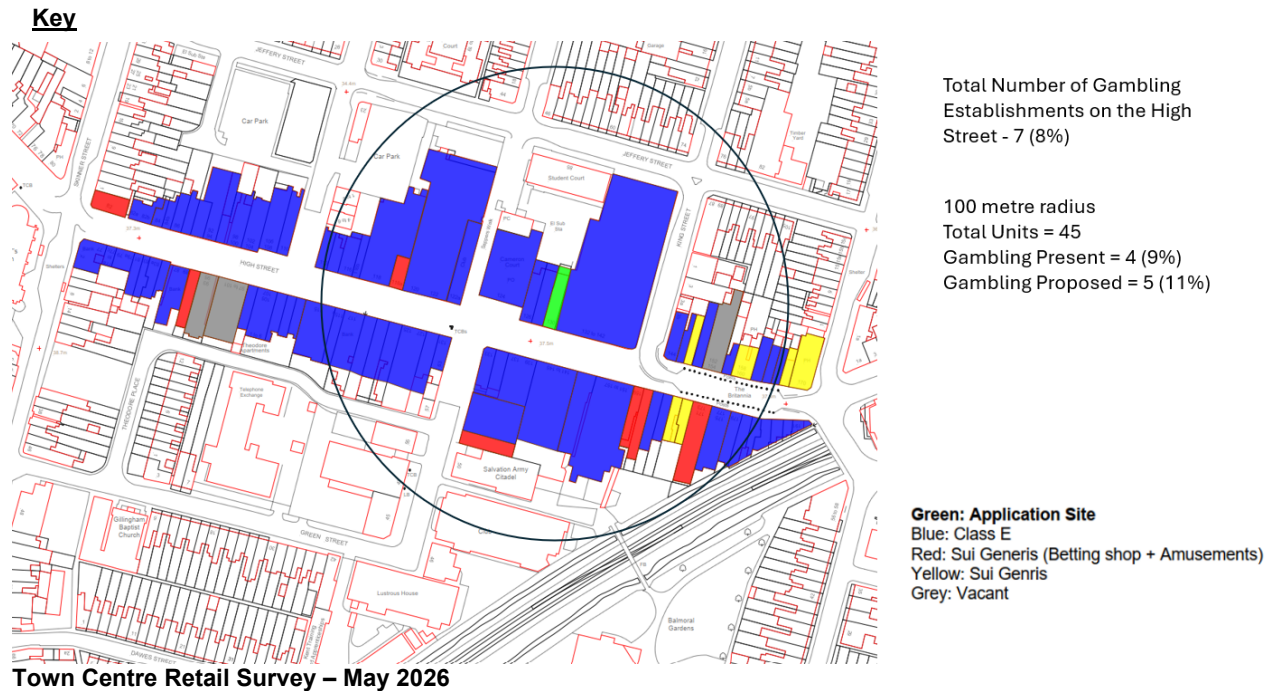
location in the pedestrianised town centre area, the unit plays an important role in delivering the objectives of Policies S16 and S19.

The applicant has stated that they have undertaken a detailed survey of the existing uses on the High Street in March of this year where they counted 28 out of 172 sui generis uses. Of these, they counted 3 betting shops. It is important to note that betting shops and amusement arcades are both counted as gambling establishments and, therefore, should both be counted for the purposes of the survey of the High Street.

In May 2026, the Council undertook a survey of the main High Street area east of Skinner Street and Canterbury Street within which both the existing and proposed units are located. The results are shown below. There are 45 retail units within 100 metres radius of the application premises. Four of these are occupied by either betting shops or amusement arcades with one of these being the existing Coral betting shop which is looking to relocate to the application premises. This represents 9% of the retail units within a 100 metre radius of the application property.

Whilst the applicant has argued that the vacancy of the existing unit would not result in any increase in the number of betting shops which operate in the town centre, the planning use would remain with the premises which could be occupied by another betting operator. It would not be possible to condition the change of use of a different premises as part of this application.

Therefore, the proposal is considered to be an additional sui generis unit to the High Street. The addition of a further betting shop will take the total betting shops/amusement arcades within a 100 metre radius of the application site to five (11% of the units). There are also two other betting shops or amusement arcades further down the high street to the west taking the total on this part of the High Street to seven. This is considered to be an over-proliferation of gambling premises that would be detrimental to the maintaining the balanced provision of uses appropriate to the aim of the centre to provide essential services, community uses to support sustainable living and creating linked trips and would cumulatively have a detrimental effect on the character and retail function of the centre.



If approved, the development would introduce a non-retail use into what is a prime retail space in Gillingham Town Centre, sited within 100 metres of four other betting shops creating a dominance of these uses in the centre of this important pedestrian High Street.

The Gillingham Town Centre Masterplan & Delivery Strategy 2019 highlights the importance of the existing anchor stores and retaining these and major national chains. The loss of Holland and Barrett from the unit is an example of this in a central position within the core retail area. The betting shop would have an inward facing rather than outward facing façade with limited views into the premises. Furthermore, the proposed betting shop would operate on the same basis as the other four betting shops/amusement arcades within 100 metres of the proposed unit (see map above), restricting access exclusively to adults and, therefore, prohibiting family groups, teenagers and children. While some other town centre uses may not appeal to all demographics, retail uses generally remain accessible to the wider public and do not impose such a significant and deliberate restriction.

The Town Centre and Markets Manager for Gillingham has been consulted and has commented as follows:

'I do not believe that the proposed change would contribute positively to the vitality and diversity for long term regeneration of Gillingham High Street.'

As Town Centre manager for Gillingham for over 25 years, we have currently been working on creating a Town Centre and Action plan with the Gillingham community. One of the key aims of activating the High Street is to improve the look and feel of the centre, not in any way create a harmful impact that this above application will achieve. The action plan supports a clear vision, encouraging a diverse mix of businesses and services that contribute to additional footfall, economic growth with supporting future social

regeneration. The proposed change of use to a betting shop doesn't support the above objectives.

Gillingham High Street already has three betting shops with three slot fruit machine units. Approving this application, there is a risk of further increasing the concentration of this type of facility.'

Whilst a betting shop can be counted as a leisure activity, it is also a gambling use which can bring negative effects to health and wellbeing. Paragraph 96 of the NPPF requires planning decisions to achieve healthy, inclusive and safe places which enable and support healthy lives. Concerns have been raised regarding the potential social and public health impacts of gambling uses, including implications for health inequalities.

Draft Local Plan Policy T27 of the draft Local Plan states that the Council will seek to manage the concentration and mix of specific premises to support healthier communities. In particular, the location and concentration of payday lenders, betting shops and amusement arcades will be carefully managed to avoid possible adverse impacts on health and wellbeing.

Using the Index of Multiple Deprivation (IMD), Gillingham South Ward is the most deprived within Medway with the High Street area (Lower Layer Super Output Area on the IMD) falling within the top 3% and 7% of most deprived neighbourhoods in England. Furthermore, the Ward has almost double the rate of unemployment compared to the national average for England and experiences considerable health inequalities with a lower life expectancy for both males and females than the national average.

Analysis by Public Health England in 2021 and the Problem Gambling Severity Index (PGSI) suggests that harmful gambling is associated with people who are unemployed and among people living in more deprived areas such as this Ward. Gambling is a public health concern and can be harmful for both people who gamble and those close to them, affecting finances, health including mental health and relationships (Office for Health Improvement and Disparities, 2025).

Within close vicinity of the site is Mercur Slots, Admiral Casino, Bet Fred, Bensons Amusements, Paddy Power and the existing Coral premises. This does not include other venues such as pubs, hotels, and social clubs that may host gaming machines, or retail outlets selling lottery tickets and scratch cards. These uses encourage gambling from the local population that is vulnerable to gambling due to higher levels of deprivation, unemployment and considerable health inequalities. Another gambling use within such close proximity to the existing gambling uses would be contrary to Policy T27 of the Draft Local Plan. There is also clear conflict with paragraph 96 of the NPPF which emphasises the need for planning policies to create healthy, inclusive and safe environments that promote health, prevent ill-health and reduce health inequalities, especially in deprived communities.

Therefore, overall, the principle of converting the existing retail unit into a betting shop is not considered acceptable as it would further increase the number of gambling premises within the core retail area resulting in an over-proliferation of

such uses that would restrict the variety and diversification of retail provision to the local community. Additionally, the high level of gambling uses within the High Street would encourage gambling by the local population which is particularly vulnerable to gambling due to higher levels of deprivation and considerable health inequalities. Therefore, the principle of the proposal is considered to be contrary to Policy R17 of the Medway Local Plan 2003, Policies S16, S19 and T27 of the Draft Local Plan paragraph 90 of the National Planning Policy Framework 2024.

Design

Policy BNE1 of the Local Plan states that development should be satisfactory in terms of scale and mass and should respect the visual amenity of the surrounding area, further emphasised by paragraph 135 of the NPPF.

The application does not propose any external changes to the premises and so there are no concerns in regards to the impact on the appearance of the host property or street scene. Therefore, the application is considered in accordance with Policy BNE1 of the Local Plan and paragraphs 131 and 135 of the NPPF.

Residential Amenity

Paragraph 135f of the NPPF states that achieving well-designed places should include creating a high standard of amenity. Policy BNE2 of the Local Plan protects those amenities enjoyed by neighbouring properties. Policy T8 of the emerging Plan is also relevant in relation to the criteria relating to amenity.

Neighbour Amenity

There are residential uses on the upper floors of the High Street but it is not clear whether the upper floors of 130 High Street are currently occupied. Nevertheless, the change of use would mean that the unit would be open from 08:00 to 22:00 every day. These times adhere to other units within the High Street Monday to Saturday and are not considered unreasonable for both Sundays and Bank Holidays as many of the shops are open on Sundays. Therefore, the use is unlikely to result in harmful levels of noise and disturbance to neighbouring properties. If the application were to be considered acceptable, a condition is recommended to ensure the proposed hours are maintained.

As such, it is considered that the proposal would meet the standards for neighbouring amenity in accordance with Policy BNE2 of the Local Plan, Policy T1 of the Draft Local Plan 2025 and paragraph 135f of the NPPF.

Highways

Policy T1 of the Local Plan relates to the impact of new development on the highway network. Policy T13 of the Local Plan is related to parking standards. Paragraph 115 of the NPPF seeks development located in sustainable locations, limiting the need to travel and offering choice of transport modes to reduce congestion and emission and improve air quality and public health. Paragraph 116 of the NPPF states that

development should only be refused on highways grounds if there is an unacceptable impact on highways safety.

The proposed unit does not have any existing vehicle parking spaces but is located within Gillingham High Street which is a highly sustainable location where customers can arrive by a variety of methods including walking, cycling and public transport.

Consequently, no objections would be raised in regard to Policies T1 and T13 of the Local Plan or paragraphs 115 and 116 of the NPPF.

Biodiversity Net Gain

As of 2 April 2024 all sites were subject to Biodiversity Net Gain (BNG) as per the conditions of Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

In this instance, no onsite habitat is impacted by the proposal and, therefore, no objection is raised to this with regard to paragraph 193 of the NPPF.

Conclusions and Reasons for Refusal

The principle of converting the existing shop into a betting office is not considered acceptable as it would further increase the number of gambling premises within the core retail area resulting in an over-proliferation of such uses that restrict access exclusively to adults prohibiting family groups, teenagers and children diminishing the family-friendly character that supports a balanced and resilient centre contrary to Policy R17 of the Medway Local Plan 2003, paragraph 90 of the National Planning Policy Framework 2024 .

The proposal would add to the proliferation of gambling uses within the High Street to a high level that would encourage gambling by the local population which is particularly vulnerable to gambling due to higher levels of deprivation and considerable health inequalities.

The application would normally have been dealt with under Delegated Powers but has been reported to Planning Committee following the Call In from Ward Members.

Background Papers

The relevant background papers relating to the individual applications comprise: the applications and all supporting documentation submitted therewith; and items identified in any Relevant History and Representations section within the report.

Any information referred to is available for inspection in the Planning Offices of Medway Council at Gun Wharf, Dock Road, Chatham ME4 4TR and here <http://publicaccess1.medway.gov.uk/online-applications/> .