

513 Green Lanes Planning Statement

**Application under Section 73 of the Town and Country
Planning Act 1990 to vary condition 3 of
HGY/2021/0066**

Luxury Leisure

16 August 2023

LICHFIELDS

16167/60/NG
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1.0 Introduction

- 1.1 On behalf of our client, Luxury Leisure, Lichfields is pleased to submit a planning application to the London Borough of Haringey ('LBH'), pursuant to Section 73 ('S73') of the Town and Country Planning Act 1990 for the variation of condition 3 attached to planning permission reference: HGY/2021/0066 ("the extant planning permission") which granted consent for the change of use of 513 Green Lanes, N4 1AN, to an Adult Gaming Centre ('AGC').
- 1.2 The extant planning permission was granted on 10 March 2021 by LBH. As part of this permission, condition 3 was imposed restricting the opening hours of the AGC from 9am until 11pm.
- 1.3 This application seeks the variation of condition 3 to allow the premises to operate to a 2am opening and considers the potential impact of continued operation of the premises between the hours of 11pm and 2am only.
- 1.4 For the avoidance of doubt, the application seeks the extension to trading hours on the premises. All other aspects of the use will continue as proposed within application reference HGY/2021/0066.

Statement Structure

- 1.5 The Planning Statement is structured as follows:
- **Section 2:** provides a description of the application site and its context (including planning history);
 - **Section 3:** provides an overview of the applicant and a description of the proposed development, including the change of use;
 - **Section 4:** sets out the relevant planning policy context;
 - **Section 5:** assesses the application proposals in the context of relevant planning policy and other material considerations; and
 - **Section 6:** provides a summary of the assessment and outlines our conclusions.

2.0 Background

Luxury Leisure

- 2.1 Luxury Leisure Ltd, formerly owned by the Noble Organisation, was founded in the 1970s with an initial portfolio of amusement arcades incorporating the iconic brand of Nobles Amusements.
- 2.2 During the 1990s, seaside arcades became an important aspect within the company's portfolio, these included Harrisons Amusements and Playland Amusements located in the English seaside resort towns of Dawlish and Redcar, respectively. Through the 1990s, the organisation's portfolio had accumulated a total of 84 town centre AGCs and 5 seaside arcades.
- 2.3 In 2014, Luxury Leisure became part of the Novomatic UK Group, and the entire gaming estate underwent a complete rebrand resulting in the establishment of Admiral. The Group further acquired Talarius in 2017 and merged the organisations to form Luxury Leisure and Talarius, combined.
- 2.4 Luxury Leisure take pride in their reputation as market leaders, setting standards in compliance, social responsibility and safer gambling initiatives, many of which have been adopted by the trade association BACTA (the trade body for the amusement and gaming machine industry in the UK) and the wider sector. They have a reputation for responsible operations and have never had a licence revoked.
- 2.5 Luxury Leisure AGCs are popular leisure destinations which provide slots and gaming entertainment services across the nation. The company has 270 gaming venues and accounts for 22.5% of the total AGC venues within the UK. In excess of half of these venues trade 24 hours a day, 7 days per week.
- 2.6 Luxury Leisure operate strict controls and best practice measures to avoid and mitigate any risk of anti-social behaviour or negative social outcomes as a result of their operation, and implementation of these measures is embedded in company policy.

The Previous Applications

- 2.7 The original planning application submitted by Luxury Leisure in 2020, for the change of use of the ground floor of 513 Green Lanes from a licensed betting office (Sui Generis) to an AGC (Sui Generis) with 24-hour operation, was refused (ref. HGY/2020/1925). The application was resubmitted in 2021 with revised trading hours and approved with conditions (ref. HGY/2021/0066).
- 2.8 The resubmitted application received two consultation responses: one objection from a resident living above the premises, and one on behalf of Ladder Community Safety Partnership and Harringay Ward Police Panel whose stance was neutral. These comments cited possible noise disturbances and loss of amenity issues as reasons that may affect the neighbouring community.
- 2.9 London Borough of Haringey Public Health also made an objection stating that the proposal is in "*a vulnerable location*" with proximity to schools and a health care facility.

Concerns on such grounds, however, were not considered applicable in relation to relevant LBH planning policy.

2.10 A copy of the officer's report for application reference HGY/2021/0066 confirming these representations is included at **Appendix 1**.

2.11 The officer's report noted that Green Lanes has a "*vibrant 'evening' economy*", however deemed it necessary to restrict trading hours consistent with other uses in the vicinity and to be "*more 'in sync' with the economy and function of this District Centre*".

2.12 In the decision notice (**Appendix 2**), the hours of operation are restricted by condition 3 which states as follows:

"The use hereby permitted shall not be operated before 09:00 hours or after 23:00 hours Monday to Sunday.

Reason: This permission is given to facilitate the beneficial use of the premises whilst ensuring that the amenities of adjacent residential properties are not diminished consistent with Policy DM1 of the Development Management DPD 2017."

2.13 Luxury Leisure is now seeking to apply to vary condition 3, to allow for extended trading hours opening to 2am, on the basis that the unit has been operating for a significant period of time with no reported issues or complaints in relation to anti-social behaviour or adverse impacts upon surrounding residential amenity.

2.14 This application therefore seeks to vary condition 3 attached to the extant planning permission.

3.0 Site Description

- 3.1 The application site is a mid-terrace property of three storeys with the relevant unit located on the ground floor at 513 Green Lanes, Haringey Ladder in Haringey. The property fronts onto Green Lanes high street and is surrounded by mostly retail or service uses at ground floor level with residential uses above.
- 3.2 Prior to Luxury Leisure's occupation of the unit mid-2021, it stood vacant for 5 years with an unsuccessful attempt to open a yoga studio that was rejected by the landlords in 2017. Before that, it was occupied by a Betfred betting shop.
- 3.3 The site is centrally located within the designated district centre of Green Lanes in a primary shopping area with primary frontage. Its immediate surroundings are characterised by retail, non-retail and residential uses including a newly opened café next door. There are, however, several units which are currently vacant or temporarily closed across from the site and along the street.
- 3.4 Haringey Green Lanes tube station is approximately 500m to the south of the site providing Overground services and Haringey train station (Great Northern Rail) lies approximately 800m south-west of the site. There are bus stops nearby serving bus routes to Charing Cross, London Bridge, Waterloo, Wood Green, Palmers Green and Upper Edmonton.

4.0 **Planning Policy Context**

Development Plan

4.1 Having regard to Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, this statement considers the application conformity with the Development Plan, relevant national policy and guidance, as well as any other material considerations.

4.2 The relevant statutory development plan and supplementary planning documents for LBH comprise:

- 1 The London Plan (2021);
- 2 Haringey's Local Plan: Strategic Policies DPD (2013 – with alterations made in 2017);
- 3 Haringey's Local Plan: Development Management DPD (2017);
- 4 Haringey's Local Plan: Site Allocations DPD (2017);
- 5 Tottenham Area Action Plan (2017);
- 6 Highgate Neighbourhood Plan (2017); and
- 7 North London Waste Plan (2022).

The London Plan

4.3 The London Plan (adopted 2021) promotes, through Policy SD6, a diverse range of uses to support the vitality and viability of town centres noting that some retail and related uses when clustered can support town centres to develop niche or specialist roles and may provide important visitor attractions.

4.4 It is recognised that over-concentrations of some uses such as amusement centres can give rise to particular concerns regarding the impact on mental and physical health and wellbeing, amenity, vitality, viability and diversity (para. 6.9.5).

4.5 As a consequence, it is advised that the proliferation and concentration of these uses should be carefully managed through Development Plans and planning decisions particularly in centres that are within Strategic Areas for Regeneration. Green Lanes is identified as being in one of these areas.

Strategic Policies DPD

4.6 Policy SP10 Town Centres is the most prominent policy regarding the site which is located in the Primary Shopping Area of Green Lanes District Town Centre. Policy SP10 states that the Council will continue to support and strengthen its district centres as important shopping and service centres to meet people's day-to-day needs.

4.7 Paragraphs 5.3.42-43 of Policy SP10 states that there is a thriving evening economy at Green Lanes providing for a diverse community. According to the Retail Study of the centre, there is little evidence of anti-social behaviour; further, CCTV coverage and police presence around the area are rated as good.

- 4.8 These statements are reinforced in paragraph 7.2.15 of Policy SP15 Culture and Leisure that recognises Harringay Green Lanes District Centre as a potential cultural quarter in future due to its rich diverse community, strong evening economy and assorted range of restaurants.

Development Management DPD

- 4.9 Policy DM1 (Delivering High Quality Design) requires that development proposals maintain a design character with active, lively frontages to the public realm, as well as ensure a high standard of privacy and amenity for its users and neighbours. The Council will support proposals that address issues of noise, vibration, fumes, odour, light pollution and microclimatic conditions likely to arise from the use and activities of the development.
- 4.10 Policy DM42 (Primary and Secondary Shopping Frontages) sets out that the use of ground floor units for appropriate town centre uses within Primary Shopping Frontages of District Town Centres will be permitted where an active frontage is provided.
- 4.11 There is no explicit policies in relation to AGCs.

Other Material Considerations

National Planning Policy Framework (2021)

- 4.12 The National Planning Policy Framework (the Framework) was last updated on 20 July 2021 by the Ministry of Housing, Communities and Local Government. The overarching aim of the Framework is to proactively deliver sustainable development to support the Government's economic growth objectives. The Framework identifies three dimensions to sustainable development: economic, social and environmental.
- 4.13 Section 8 of the Framework promotes healthy and safe communities. Paragraphs 92 and 97 are of particular relevance to decision-making concerned with ensuring health, inclusive and safe communities.

“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continual use of public areas;”

“Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and

the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security;”

Paragraph 56 is also relevant for Local Planning Authorities in considering the imposition or wording of conditions. It states:

“Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Agreeing conditions early is beneficial to all parties involved in the process and can speed up decision-making. Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification.”

- 4.14 Whilst the Government is currently consulting on changes to the Framework as part of the national policy reforms proposed by the Levelling-up and Regeneration Bill, the paragraphs above remain unaffected.

Planning Practice Guidance

- 4.15 On 29 November 2016, the Government published the National Planning Practice Guidance (PPG) which is a live online document which is regularly updated (last updated 24 June 2021).
- 4.16 Of particular relevance to this application are Section 2b on ensuring the vitality of town centres, Section 14 on making an application (and related parts in Section 21b), Section 17a providing guidance on seeking planning permission via a S.73 as well as Section 21a on use of conditions.

5.0 Planning Assessment

- 5.1 The extant planning permission grants planning permission for the Sui Generis use of 513 Green Lanes as an Adult Gaming Centre, with restricted trading hours of 9:00 am until 11:00 pm, 7 days a week. On this basis, the principle of the Sui Generis use at the premises has already been established by this planning permission.
- 5.2 This Section 73 application relates to hours of operation only and does not seek to change any other aspects of the originally approved planning permission for the AGC.
- 5.3 It is considered that the key issues for consideration of this application for extended trading hours are potential impacts on crime, fear of crime and neighbouring residential amenity relating to the operation of the premise for the hours between 11pm and 2am only.

Anti-Social Behaviour, Crime and Fear of Crime

- 5.4 Due to their position as market leaders, the nature of their operation and by virtue of more than 50% of their premises operating 24 hours per day, Luxury Leisure take pride in their reputation, setting standards in compliance, safer gambling initiatives and social responsibility, and as part of this, security matters are taken very seriously. It is important to note that no alcohol is sold or allowed at any Luxury Leisure's AGCs. Anyone under the influence is refused entry. This is very clear in Luxury Leisure's licence and differs from other similar operations such as bingo halls/casinos etc.
- 5.5 Luxury Leisure have a 'Security and Compliance Statement' (**Appendix 3**) which sets out a summary of the security measures taken by Luxury Leisure, and their parent company (Novomatic UK). The company implements a range of best practices to mitigate any risk of anti-social behaviour or negative social outcomes.
- 5.6 Relevant measures included and detailed in the 'Security and Compliance Statement' include:
- 1 Enforcement of a 'think 25' policy and staff training;
 - 2 Participation in local policing strategies/partnerships;
 - 3 Use of CCTV as appropriate;
 - 4 Employing professional staff and providing extensive training.
- 5.7 Other measures include a monitored intruder and hold-up alarm with mobile PA units for staff, static buttons in the office and the use of door supervisors where required. Luxury Leisure also has procedures in place for making the premises secure, so that counting and securing the takings can be carried out in a secure environment, and for staff leaving the premises, so that staff safety is not compromised. This includes a 'three safe' system, comprising a 'day safe', time-lock safe and deposit safe to reduce the risk of robbery or burglary.
- 5.8 As highlighted previously, Luxury Leisure operate approximately 50% of their premises 24 hours a day, 7 days a week, in similar city and town centre locations across the country. They experience very few or no issues, incidents or complaints as a result of opening through the night. Luxury Leisure are currently operating 24/7 from their other AGCs

within the Borough at 475 High Road (Tottenham), 9 High Road (Turnpike Lane) and 117 High Road (Wood Green). The application site itself has had no planning enforcement history or action taken against it, with no past experiences of any issues or instances relating to noise, crime or anti-social behaviour since their operation on Green Lanes began in August 2021. This has been confirmed in correspondence with the Council's Planning Enforcement Team included at **Appendix 4**.

- 5.9 Luxury Leisure AGCs generally appeal to a wide demographic of customers, and this is something that is regularly recorded and monitored by the company. Surveys of Admiral customers suggest that generally there is 35%/65% male:female split with a high proportion of customers being between the ages of 45 and 55. Based on experience and anecdotal evidence, many visitors over night-time hours are those working shifts or anti-social hours and those working within the hospitality industry. These often include chefs, waiters, bar workers, taxi and delivery drivers. The majority of these customers arrive alone and are not part of larger groups.
- 5.10 Luxury Leisure have undertaken surveys of visitor numbers across a range of AGCs which operate 24 hours a day. This data was collected from 67 AGCs from the North-West, Midlands, London and the South-East and the East of England over a 2-week period in January 2022. These are included at **Appendix 5**. Generally, this demonstrates that on average there are less than 7 visitors per hour during the period between 8pm and 1am. This supports Luxury Leisure's assertion that their late-night operation is quiet and low key, but also represents an important element of their service, which focuses around providing a service/leisure facility for those working anti-social hours. Due to the lower numbers during these periods, Luxury Leisure can offer a more personalised experience for these visitors which accords with their general ethos relating to customer service, whereby staff do not sit behind counters or screens, and mingle and interact with the customers.
- 5.11 There are a number of recent appeal decisions relating to AGCs which further support the applicant's assertion that AGCs are not considered to contribute towards crime and anti-social behaviour, and that prolonged operation of these types of premises do not contribute towards any related issues.
- 5.12 The appeal decisions referenced below are included at **Appendix 6**.
- **Terry Farr vs London Borough of Waltham Forest (ref. APP/U5930/W/18/3193121 – 27 July 2018)**

When considering whether the proposal would have an impact on crime and disorder or whether it would contribute towards gambling addiction, the Inspector concluded at para. 13 that *"those are matters that are addressed by 'other legislation' and are therefore not for my consideration in determining this appeal"*.
 - **Luxury Leisure vs Hull City Council (ref: APP/V2004/W/19/3233244 – 22 October 2019)**

In relation to the proposed 24/7 trading in a district centre, the Inspector concluded at para. 22 that *"the application submission indicates it would be in 24-hour operation on all days of the week. This is not unacceptable with its District centre location. Thus, a restriction of the opening hours would also not be reasonable and necessary"*.

- **East Kent Leasing Ltd vs Luton Council (ref: APP/Bo230/W/20/3256275 – 29 December 2020)**

In determining appropriate conditions for the planning permission, the Inspector rejected the Council's suggestion of a condition limiting the opening hours of the premises to 09:00 to 23:00 Mondays to Saturdays and 10:00 to 22:00 Sundays and Bank Holidays. The Inspector considered that the nature of an AGC use is unlikely to result in undue noise and disturbance from comings and goings (at para. 17), and given its town centre location and the presence of late night and 24-hour uses in the area, did not consider it necessary to limit the opening hours.

- 5.13 To summarise, the applicant takes community safety and crime prevention very seriously and has numerous measures in place to prevent anti-social behaviour. The proposals are considered to protect the security of the district centre in accordance with policies in the Development Plan and the Framework.

Impacts upon Amenity

- 5.14 The site is located within Green Lanes District Centre. Policy DM1 of the Development Management DPD requires town centre uses (which would include AGCs) to have active street frontages, be of high-quality design that relate well with the surroundings and with respect to high standards of neighbouring amenity.
- 5.15 The site is surrounded by a mix of predominantly commercial premises at street level, including another AGC three doors away at 519 Green Lanes. Examples of extended late-night opening hours within the immediate vicinity of the site include Devran Kitchen (restaurant; open 8am-2am everyday), Gokyuzu (restaurant; open 9am-2am everyday), Hala (restaurant; open 8am-2am everyday), Hanedan (restaurant; open 12pm-12am everyday), Brouhaha (bar; open 4pm-12am on Fridays and Saturdays), Haringey Snooker Club (social/sports club; open 11am-2am Sunday to Thursday and 11am-3am Friday to Saturday) and The Salisbury Hotel (gastropub; open until midnight on Fridays and Saturdays). In terms of sensitive uses such as residential properties, there are residential dwellings above the shopfronts all along the high street.
- 5.16 A Noise Assessment was undertaken by Hepworth Acoustics in support of the proposed AGC during the planning application proposing 24/7 hours of operation (**Appendix 7**). A noise survey was carried out on 8 July 2020 between 01:00 and 03:00 to represent typical night-time conditions and between 13:00 and 15:00 to represent typical daytime conditions. Measurements were taken simultaneously at two different locations. Noise levels were measured at Location 1 and Location 2, approximately 1 metre and 5 metres from the existing building façade respectively.
- 5.17 Representative data taken from other operational Admiral AGCs has been used to demonstrate the typical noise levels generated by such uses. It is noted that these are very modest when compared to corresponding noise levels from other commercial premises such as bars and restaurants. These have been used to calculate and assess the potential noise impact from the proposed adult gaming centre on the nearest residential properties.
- 5.18 The assessment concludes that taking into consideration anticipated trading noise levels for similar AGCs, details of the existing shop frontage and the separation distances to

intervening premises in terms of internal, external and customer noise insulation, the noise impact of the proposed development will result in no discernible loss of amenity to the adjacent residences.

- 5.19 It should be highlighted that no alcohol is served within the AGC and part of Luxury Leisure's 'Security and Compliance Statement' (**Appendix 3**) identifies that suitably experienced and qualified staff, such as door supervisors, are employed to ensure that any issues are managed effectively.
- 5.20 The applicant also notes that within an appeal decision from 2020 (ref. APP/Bo230/W/20/3256275 at **Appendix 6**), the Inspector concluded at paragraph 17 that the nature of an AGC use is unlikely to result in undue noise and disturbance from comings and goings within its town centre location and did not consider it necessary to limit the opening hours. This is something further confirmed more recently by an Inspector as part of an appeal in the London Borough of Brent (ref. APP/T5150/W/21/3272089 at **Appendix 6**).
- 5.21 Furthermore, the applicant has already carried out soundproofing works approved by the local planning authority on the premises in compliance with condition 5 attached to the previous planning permission to safeguard the amenity of nearby premises and the general area (**Appendix 2**). These details ensured no amplified sound from the AGC would be audible outside the premises including the residence above and included the fitting of self-closing entrance and exit doors (ref. HGY/2021/1555). The officer concluded that the measured sound insulation performance exceeds the recommended performance criteria, therefore satisfying condition 5.
- 5.22 To summarise, Luxury Leisure has successfully traded with extended trading hours from 132 of its 270 premises nationally and the business is well-equipped to operate through night-time hours. The applicant has proven robust and tested measures in place to ensure its safe and amenable operation through to early morning hours, every day of the week.

6.0 Conclusions

- 6.1 This Section 73 application is submitted on behalf of Luxury Leisure for the variation of condition 3 (hours of operation) attached to planning permission reference: HGY/2021/0066, which granted permission for the change of use of 513 Green Lanes to an Adult Gaming Centre (AGC). Condition 3 restricted the hours of operations to 9am-11pm, 7 days per week, which was imposed for reasons relating to safeguarding the amenity of neighbouring residential properties.
- 6.2 Paragraph 55 of the Framework makes clear that planning conditions should be kept to a minimum, and only used where they satisfy the following tests: necessary; relevant to planning; relevant to the development to be permitted; enforceable; precise; and reasonable in all other respects. For the reasons set out in this Statement, we consider that the existing restriction on operational hours is not necessary or reasonable to make the development acceptable in planning terms and thus the variation of this condition to extend trading hours to 2am is justified.
- 6.3 This is supported by the Inspector in *Luxury Leisure vs Hull City Council* (ref: APP/V2004/W/19/3233244 para. 5.14 at **Appendix 6**), who did not consider a condition restricting operating hours to be reasonable nor necessary.
- 6.4 The proposed operating hours of the premises (9am-2am) are entirely in accordance with the Development Plan. Specifically, the proposals have regard to considerations set out in Policy SP10 in the LBH's Strategic Policies DPD and Policy DM1 of the LBH's Development Management DPD, and would not cause or contribute towards any issues relating to crime, anti-social behaviour or disturbance to nearby occupiers within this part of Green Lanes District Centre.
- 6.5 It should be noted that more than half of Luxury Leisure's AGCs across the country operate 24 hours a day and even more operating until the early hours of the morning in similar town centre locations. The applicant's other premises within the Borough trade 24/7 at 475 High Road (Tottenham), 9 High Road (Turnpike Lane) and 117 High Road (Wood Green). There are a number of other similar uses operating late nights within short walking distance and within the vicinity of the site.
- 6.6 Luxury Leisure has robust measures in place to ensure that the proposed development would not have a detrimental impact on crime or the amenity of neighbouring properties. The applicant takes community safety and crime prevention very seriously and has numerous measures in place to prevent anti-social behaviour. The visitor profile of AGCs has been surveyed by Luxury Leisure and it is demonstrated that there are low numbers of customers visiting between the hours of 11pm and 2am, who are generally older than 35, visit alone and are often those who work shifts such as drivers and restaurant or bar workers.
- 6.7 There are numerous precedent cases, which provide a compelling case for the 9am to 2am operation of 513 Green Lanes. These decisions are detailed in the section above, with full decision letters included at **Appendix 6**. These demonstrate that by nature, AGCs and similar uses have been considered by Inspectors as unlikely to result in undue noise and disturbance from comings and goings, and that given their town centre locations and the presence of late-night uses in the area, would not necessitate limited opening hours.

- 6.8 Specifically in relation to the previous application (ref. HGY/2021/0066 at **Appendix 1**), Officers acknowledge that the site is in a town centre location where there is increased activity due to the opening times of shops, traffic and other residential properties contributing to an ‘evening economy’ in the area. It is not considered that the low number of customers visiting the premises between the proposed hours of 11pm and 2am would cause undue harm to neighbouring amenity above the existing situation.
- 6.9 It is also worth highlighting that the AGC at 513 Green Lanes, Haringey, has been in operation for c. 24 months and has not experienced any issues or instances relating to crime or anti-social behaviour since their operation began. This has been confirmed by the Council’s Planning Enforcement Team. In addition, we note that there were no comments from the Council’s Environmental Health team in relation to application ref. HGY/2020/1925 where 24/7 trading hours were originally proposed.
- 6.10 The application therefore requests that condition 3 (operating hours) attached to planning permission ref. HGY/2021/0066 is varied and the premises is able to operate from 9am to 2am every day.

Appendix 1 Officer's Report (ref. HGY/2021/0066)

REPORT FOR CONSIDERATION UNDER DELEGATED POWERS

1. APPLICATION DETAILS

Reference No: HGY/2021/0066

Ward: Harringay

Date received: 23/12/2020

Last amended date: 05/03/21 (inclusion of elevation showing replacement rear elevation condenser units)

Drawing number of plans: 1509 (0)01 A1; 1509 (0)02 A1; 1509 (0)03 A3; 1509 (0)05 A1; 1509 (S)01 A1; 1509 (S)02 A1; Planning Statement dated December 2020; 'Hepworth Acoustics' Noise Assessment; 1509 (0)06 A1.

Address: 513 Green Lanes N4 1AN

Proposal: Change of use of the ground floor of 513 Green Lanes, from a Licensed Betting Office (Sui Generis) to an Adult Gaming Centre (Sui Generis) operating from 09:00 am to 23:00 pm seven days per week; Associated works including shopfront alterations and replacement plant.

Applicant: Luxury Leisure

Officer contact: Conor Guilfoyle

2. SUMMARY OF RECOMMENDATION

GRANT PERMISSION subject to conditions

Conditions:

- 1) Development begun no later than three years from date of decision
- 2) In accordance with approved plans
- 3) Hours of operation
- 4) Noise level
- 5) Sound insulation

Informatives:

- 1) Hours of construction
- 2) Party Wall Act
- 3) Signage

3. PROPOSED DEVELOPMENT AND LOCATION DETAILS

Proposed development

- 3.1 This is an application for the change of use of the premises from a licensed betting office (Sui Generis) to an adult gaming centre (AGC) (Sui Generis) with associated shopfront alterations and replacement plant.

- 3.2 This application follows a recent application in 2020 for the same change of use (ref: HGY/2020/1925), the only difference between such applications being the opening hours associated with the new use. Specifically, the 2020 application sought to operate the adult gaming use on a 24 hour basis / 7 days a week, while this current applications seeks to operate between the hours of 09:00am to 23:00pm - 7 days a week.

Site and Surroundings

- 3.3 The application site relates to a ground floor commercial premises in use as a licensed betting office (Sui Generis) in a three-storey mid-terraced building with residential accommodation above. Numbers 515 and 509 Green Lanes adjoin to the north and south respectively. No.513a lies behind the rear to the west.
- 3.4 Green Lanes is a long-established shopping street and is the main north-south route through the borough. It is a designated District Centre in the Haringey Local Plan and the London Plan. The centre stretches along Green Lanes from the junction of Endymion Road, near Finsbury Park, in the south, to the junction with Beresford road in the north.
- 3.5 The property falls within primary frontage as designated in the Local Plan. The area is characterised by a mix of commercial uses including retail, restaurant and fast-food establishments.

Relevant Planning and Enforcement history

- HGY/2020/1925 - Change of use of the ground floor of 513 Green Lanes, from a Licensed Betting Office (Sui Generis) to an Adult Gaming Centre (Sui Generis) with shopfront alterations and replacement plant – Refused 16/09/2020 for the following reason:

The proposed extended opening hours with the associated use would give rise to an increase in general activity and associated noise and disturbance to the front of the premises during anti-social hours, with potential for anti-social behaviour, overall detrimental to the residential amenity of neighbouring occupiers contrary to Policies DM1 of the Haringey Development Management DPD (2017) and Policy SP10 of the Haringey Local Plan (2017).

- HGY/2017/0631 - Prior approval for change of use from Betting Office (Sui Generis) to Yoga Studio (D2) – Prior approval not required 10/04/2017
- HGY/2009/1091: Removal of condition 2 of planning decision OLD/1979/0372 to permit A2 (financial and professional services) uses at ground floor level – Granted
- OLD/1979/0372: Use of ground floor as a building society branch – Granted

4. CONSULTATION RESPONSE

4.1 The following were consulted regarding the application:

- None

5. LOCAL REPRESENTATIONS

5.1 The application has been publicised by way of 8 letters. The number of representations received from neighbours, local groups, etc. in response to notification and publicity of the application were as follows:

No of individual responses:

Objecting: 1

Supporting: 0

Neither: 1

5.2 The following local groups/societies made representations:

Ladder Community Safety Partnership (LCSP) (observation):

While the proposal is not welcomed, the LPSCP understand that this application is for opening hours of 9am – 11pm daily which will go some way to alleviating the loss of amenity and antisocial behaviour likely to be caused by the original proposal (HGY/2020/1925). As it seems likely that permission will be granted, request that the operating hours are stated and justified as clearly as possible in the conditions attached to avoid future challenge/ appeal.

(Officer Comment: A condition controlling the hours of operation is attached)

London Borough of Haringey Public Health: Objection:

Proposal is at a vulnerable location with number of schools nearby, a health care facility and two other AGCs within 2 minutes' walk and between two gambling premises on the [unspecified] high road – the over-concentration of gambling premises is stated to have a negative impact on the health and wellbeing of Haringey residents. Therefore, strong need to safeguard the area from over-concentration of gambling premises, protect our vulnerable communities, help to promote a healthy high street and retain a vibrant mix of uses in the town centre.

(Officer Comment: While the concerns are noted, a refusal on such grounds cannot be justified under relevant planning policy, mindful of the historic use of this site, the recent appeal decision etc – as discussed/ explained further below).

5.3 The following issues were raised in representations that are material to the determination of the application and are addressed in the next section of this report:

- Hours of operation/limits to avoid amenity harm to neighbours;
- Crime/anti-social behaviour;
- Number of betting shops in the area;
- Over-concentration of gambling premises with associated impact on health and wellbeing;
- Noise and disturbance associated with hours of operation, including objection to Sunday operating;
- Noise/disturbance from use/machines and from plant/condensers in relation to upstairs flat.

6 MATERIAL PLANNING CONSIDERATIONS

The main planning considerations raised by the proposed development are:

1. Background;
2. Vitality and viability;
3. Impact of the proposed development on the character and appearance of the area;
4. Effect on living conditions/ amenity of the area.

Background

- 6.1 As discussed above this current application follows on from a recent application in 2020 for the same use but to operate on a 24 hour basis. This application was refused permission as the extended opening hours over and above those associated with the historic use of the site as a betting shop were viewed by the LPA to give rise to an increase in general activity and associated noise and disturbance to the front of the premise, with potential for anti-social behaviour, which was viewed to overall be detrimental to the residential amenity of neighbouring occupiers.
- 6.2 The application seeks to operate between the hours of 09:00am to 23:00pm - 7 days a week. This previous refusal and the deliberation in the previous Officer's report are the basis for assessing this current application – specifically the differences between the applications and whether the changes made overcome this previous reason for refusal.

Impact on vitality and viability

- 6.3 The property forms a primary frontage for the purposes of the development plan. Policy DM42 of the Haringey Development Management DPD (2017) establishes, amongst other things, that within such frontages the use of ground floor units for appropriate town centre uses will be permitted firstly, where the overall number of units in non-retail use will not exceed 50% across the entire frontage; and secondly, an active frontage would be provided, or if this would not be possible, a window display or other appropriate town centre frontage.
- 6.4 The existing use is a non-retail 'sui generis' use. While the proposed use is materially different to warrant a change of use application, the uses are very similar in function

and equally would be a 'sui generis use'. Therefore, there would be no material change in the number of non-retail frontages on the street here.

- 6.5 The supporting text to Policy DM42 includes references to types of uses that may be appropriate to a town centre, including 'non-retail uses that are often directly linked to shopping trips'. It does not specifically exclude adult gaming centres from the definition. Consequently, taking these matters together, Officers consider that the proposed development would comply with the first aspect of Policy DM42.
- 6.6 Material submitted by the appellant includes detail of the proposed shop frontage treatment. It would be largely glazed to invite custom and consequently, in terms of both the proposed development's effect on the balance of non-retail uses within the primary frontage, and in terms of its potential frontage treatment, Officers consider that it would not materially harm the vitality and viability of the district centre.

Impact on the character and appearance of the area

- 6.7 Policy DM1 of the DPD requires development proposals to relate positively to their locality. Policy SP11 of the Haringey Local Plan (2017) requires the highest standard of design that respects its local context and character and historic significance.
- 6.8 The application proposes shopfront alterations. There are a variety of modern shopfronts in the area which are largely glazed, similar to the proposed. In terms of design and detailing the new shopfront is considered acceptable.
- 6.9 The proposal also seeks to replace two condenser units. Details show that the units would not be materially different compared to the current on site. The associated changes to the premises here are considered acceptable in terms of the appearance of this premises as such not harming the character of the area.

Effect on living conditions/ amenity of the area

Operating hours

- 6.10 This area of Green Lanes has a range of mainly commercial uses mostly comprising retail, restaurant and fast-food outlets. The proposal would not operate on a 24 hours per day as per the previous application, but instead from 09:00 to 23:00.
- 6.11 Green Lanes already has a vibrant 'evening' economy, with 'evening' economic uses including restaurants and take-aways closing by late night and early morning. The revised hours of operation are considered to be more 'in sync' with the economy and function of this District Centre.
- 6.12 As the revised opening hours would no longer be beyond 23.00 and into the early morning, this represents a material change compared to the previous application, with its hours of opening no longer viewed to attract customers late at night when residents can reasonably expect activity and background noise to be lower. This avoids the risk of customers and comings and goings causing noise and disturbance when background noise levels are lower.

Anti-social behaviour

- 6.13 It is noted that concerns are raised about the use of this site as an Adult Gaming use. It is important to highlight that the planning system as underpinned by legislation and policy cannot specifically control or proscribe uses, rather planning seeks to control the more broader movement within use classes (as per the Use Classes Order 1987); although the extent of such controls have been reduced in recent years with changes to the Use Classes Order made by central government. Specifically a LPA would need to be able to argue how movement from one use class to another would cause material harm, which is a high test.
- 6.14 In determining this application the LPA need to be mindful that in planning/land use terms a Betting Office (Sui Generis use) and a Adult Gaming Centre (Sui Generis use) are not very different and as such it is not possible to argue in planning terms that there is harm from moving from one to the other.
- 6.15 While concerns about Adult Gaming Centre on vulnerable people are understandable, concerns about such risks cannot be easily controlled or addressed via the planning system, but rather are more directly related to licensing and management functions, controlled by other areas of legislation. Specifically the Gambling Commission sets out the Licence Conditions and Codes of Practice (LCCP), which are applicable to operators of Adult Gaming Centres, with monitoring and enforcement undertaken by a local authority's licensing officers and the Gambling Commission's licensing officers. It is within this framework which such uses are meant to operate to protect vulnerable persons and more broadly prevent anti-social behaviour arising.
- 6.16 As recognised in the previous Officer's report, potential noise nuisance with such a late night use with associated comings and goings was viewed to likely to contribute to anti-social behaviour. As such Officers sought to prevent this from occurring by refusing such a 24 hour use, specifically in order to protect typical hours where residents have a reasonable expectation to have undisturbed sleep. The hours as applied for now are no longer viewed to harm such conditions or be materially different compared to the opening hours of many other uses in this district centre. As such the hours as applied for now are considered to be acceptable, with a condition being imposed in respect of these.

Noise from condenser units and internal noise generated

- 6.17 Concerns were raised from the occupiers of the upstairs flat in relation to noise and disturbance both from the external condenser units and internal noise generated in connection with the use. A noise report was submitted with the application which considered both aspects.
- 6.18 In respect of the two new external condensers these are to be installed to the rear of the property and would replace existing condensers in a similar location.

- 6.19 The predicted condenser noise levels in relation to the nearest habitable room window are outlined in the report submitted. The report recommends that mechanical equipment is mounted on suitable vibration isolation mounts or hangers to control structure-borne or ground-borne noise. The noise limits with such condenser and vibration mitigation measures are considered to be acceptable, so as not to harm the amenity of neighbouring occupiers. A condition will be imposed in respect of the noise rating level of such equipment.
- 6.20 In respect of internal noise generated noise measurements have been taken from an existing Admiral premises to provide reference internal noise levels for the expected gaming activities in relation to the site here. The noise report outlines that the trading noise is characterised by fairly modest average noise levels interspersed with occasional periods of more elevated noise. To mitigate against concerns about noise the report specifies airborne sound insulation between the ground floor gaming area and the flat above to achieve appropriate sound reduction. A condition is being imposed to secure the implementation of such sound proofing before this use becomes fully operational.
- 6.21 In terms of the concern about operating on Sundays the LPA would not be able to restrict use on this day mindful that many town centre uses operate on Sundays.

Conclusion

- 6.22 The proposal would not cause material harm to the vitality and viability, or character and appearance of Green Lanes District Centre and subject to conditions being imposed in respect of opening hours, noise rating level from the condenser units and internal sound insulation, the use here would not materially harm neighbouring residential amenity.
- 6.23 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION

7. CIL APPLICABLE

- 7.1 N/A – no new floorspace created.

8. RECOMMENDATION

GRANT PERMISSION subject to conditions

Registered No. HGY/2021/0066

Subject to the following condition(s)

1. The development hereby authorised must be begun not later than the expiration of 3 years from the date of this permission, failing which the permission shall be of no effect.

Reason: This condition is imposed by virtue of the provisions of the Planning & Compulsory Purchase Act 2004 and to prevent the accumulation of unimplemented planning permissions.

2. The approved plans comprise drawing nos; 1509 (0)01 A1; 1509 (0)02 A1; 1509 (0)03 A3; 1509 (0)05 A1; 1509 (S)01 A1; 1509 (S)02 A1; Planning Statement dated December 2020; 'Hepworth Acoustics' Noise Assessment; 1509 (0)06 A1. The development shall be completed in accordance with the approved plans except where conditions attached to this planning permission indicate otherwise or where alternative details have been subsequently approved following an application for a non-material amendment.

Reason: In order to ensure the development is carried out in accordance with the approved details and in the interests of amenity.

3. The use hereby permitted shall not be operated before 09:00 hours or after 23:00 hours Monday to Sunday.

Reason: This permission is given to facilitate the beneficial use of the premises whilst ensuring that the amenities of adjacent residential properties are not diminished consistent with Policy DM1 of The Development Management DPD 2017.

4. The rating level of any noise generated by the condenser units hereby approved shall be at least 5 dB below the pre-existing background level as determined by BS4142: 2014 Methods for rating and assessing industrial and commercial sound with the equipment mounted on suitable vibration isolation mounts or hangers to control structure-borne or ground-borne noise.

Reason: To safeguard the amenity of nearby premises and the area generally.

5. The use hereby permitted shall not take place until full details of a scheme for the soundproofing of the premises has been submitted to and approved in writing by the local planning authority and until these works have been carried out as approved. These details shall include the fitting of self-closing entrance and exit doors which shall thereafter be retained. No amplified sound from the adult gaming centre shall be audible outside the premises.

Reason: To safeguard the amenity of nearby premises and the area generally.

INFORMATIVE: Land Ownership

The applicant is advised that this planning permission does not convey the right to enter onto or build on land not within his ownership.

INFORMATIVE: Party Wall Act

The applicant's attention is drawn to the Party Wall Act 1996 which sets out requirements for notice to be given to relevant adjoining owners of intended works on a shared wall, on a boundary or if excavations are to be carried out near a neighbouring building.

INFORMATIVE: Hours of Construction Work

The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following hours:-

8.00am - 6.00pm Monday to Friday

8.00am - 1.00pm Saturday

and not at all on Sundays and Bank Holidays.

INFORMATIVE:

Planning permission has been granted without prejudice to the need to get advertisement consent under the Town & Country Planning (Control of Advertisements) (England) Regulations 2007.

Appendix 2 Decision Notice (ref. HGY/2021/0066)

Planning Service

Rob Krzyszowski Interim Assistant Director Planning, Building Standards & Sustainability

Miss Nuala Wheatley
Lichfields
The Minster Building
21 Mincing Lane
London
EC3R 7AG

Planning Application Reference No. **HGY/2021/0066**

TOWN AND COUNTRY PLANNING ACT 1990
TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND)
ORDER 2015

NOTICE OF PLANNING PERMISSION

Location: **513 Green Lanes, N4**

Proposal: **Change of use of the ground floor of 513 Green Lanes, from a Licensed Betting Office (Sui Generis) to an Adult Gaming Centre (Sui Generis) operating from 09:00 am to 23:00 pm seven days per week; Associated works including shopfront alterations and replacement plant.**

In pursuance of their powers under the above Act, the London Borough of Haringey as Local Planning Authority hereby **PERMIT** the above development in accordance with the application dated 23/12/2020 and drawing numbers: 1509 (O)01 A1; 1509 (O)02 A1; 1509 (O)03 A3; 1509 (O)05 A1; 1509 (S)01 A1; 1509 (S)02 A1; Planning Statement dated December 2020; 'Hepworth Acoustics' Noise Assessment; 1509 (O)06 A1

SEE SCHEDULE OF CONDITIONS ATTACHED

10/03/2021



Dean Hermitage
Head of Development Management and Planning Enforcement
Planning Service

NOTE:

1. You can find advice in regard to your rights of appeal at:
www.planningportal.gov.uk/planning/appeals/guidance/guidancecontent
2. This notice relates solely to a planning decision and does not purport to convey any approval or consent which may be required under the Building Regulations or any other statutory purpose.
If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning Inspectorate (inquiryappeals@planninginspectorate.gov.uk) at least 10 days before submitting the appeal.
For more information about making a Building Regulations application, please contact Haringey Council Building Control Team by email building.control@haringey.gov.uk, telephone 020 8489 5504, or see our website at www.haringey.gov.uk/buildingcontrol.

Planning Service
6th Floor, River Park House,
225 High Road, Wood Green,
London, N22 8HQ
T 020 8489 5504
www.haringey.gov.uk

Planning Service

Rob Krzyszowski Interim Assistant Director Planning, Building Standards & Sustainability

HGY/2021/0066

The following conditions have been applied to this consent and these conditions must be complied with:

1. The development hereby authorised must be begun not later than the expiration of 3 years from the date of this permission, failing which the permission shall be of no effect.

Reason: This condition is imposed by virtue of the provisions of the Planning & Compulsory Purchase Act 2004 and to prevent the accumulation of unimplemented planning permissions.

2. The approved plans comprise drawing nos; 1509 (O)01 A1; 1509 (O)02 A1; 1509 (O)03 A3; 1509 (O)05 A1; 1509 (S)01 A1; 1509 (S)02 A1; Planning Statement dated December 2020; 'Hepworth Acoustics' Noise Assessment; 1509 (O)06 A1. The development shall be completed in accordance with the approved plans except where conditions attached to this planning permission indicate otherwise or where alternative details have been subsequently approved following an application for a non-material amendment.

Reason: In order to ensure the development is carried out in accordance with the approved details and in the interests of amenity.

3. The use hereby permitted shall not be operated before 09:00 hours or after 23:00 hours Monday to Sunday.

Reason: This permission is given to facilitate the beneficial use of the premises whilst ensuring that the amenities of adjacent residential properties are not diminished consistent with Policy DM1 of The Development Management DPD 2017.

4. The rating level of any noise generated by the condenser units hereby approved shall be at least 5 dB below the pre-existing background level as determined by BS4142: 2014 Methods for rating and assessing industrial and commercial sound with the equipment mounted on suitable vibration isolation mounts or hangers to control structure-borne or ground-borne noise.

Reason: To safeguard the amenity of nearby premises and the area generally.

5. The use hereby permitted shall not take place until full details of a scheme for the soundproofing of the premises has been submitted to and approved in writing by the local planning authority and until these works have been carried out as approved. These details shall include the fitting of self-closing entrance and exit doors which shall thereafter be retained. No amplified sound from the adult gaming centre shall be audible outside the premises.

Reason: To safeguard the amenity of nearby premises and the area generally.

INFORMATIVE: Land Ownership

The applicant is advised that this planning permission does not convey the right to enter onto or build on land not within his ownership.

Planning Service

Rob Krzyszowski Interim Assistant Director Planning, Building Standards & Sustainability

INFORMATIVE: Party Wall Act

The applicant's attention is drawn to the Party Wall Act 1996 which sets out requirements for notice to be given to relevant adjoining owners of intended works on a shared wall, on a boundary or if excavations are to be carried out near a neighbouring building.

INFORMATIVE: Hours of Construction Work

The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following hours:-

8.00am - 6.00pm Monday to Friday

8.00am - 1.00pm Saturday

and not at all on Sundays and Bank Holidays.

INFORMATIVE:

Planning permission has been granted without prejudice to the need to get advertisement consent under the Town & Country Planning (Control of Advertisements) (England) Regulations 2007.

INFORMATIVE:

In dealing with this application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our pre-application advice service and published development plan, comprising the London Plan 2016, the Haringey Local Plan 2017 along with relevant SPD/SPG documents, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

10/03/2021



Dean Hermitage
Head of Development Management and Planning Enforcement
Planning Service

Appendix 3 Security and Social Responsibility Statement (March 2023)



LUXURY LEISURE, TALARIUS LTD & RAL LTD
NOVOMATIC GROUP
5th Avenue Plaza
Queensway
Team Valley
Gateshead
NE11 0BL

Luxury Leisure Talarius – Security and Social Responsibility

Dear Sir/Madam,

At Luxury Leisure Talarius, we adopt a risk-based approach to our security and social responsibility provision to ensure we uphold the Licensing Objectives at every location where we operate. The security department within Luxury Leisure has 13 members of staff, including a National Security Manager, five Regional Security Managers and four auditors, whilst our compliance department has an additional three members of staff, including a National Compliance Manager, Safer Gambling Manager and Data Protection Officer, all working under the Risk and Compliance Director.

The majority of our stores are in prominent town centre locations and appeal to a wide demographic of clientele, ranging from young professionals through to a more elderly, often retired customer base by providing a modern high street alternative to bingo clubs, casinos and bookmakers. Currently our national statistics show that 65% of our customers are females aged over 45.

Risk Assessment by venue- The assessment of risk to the licensing objectives at a particular venue location is supported by a bespoke open source risk identification tool designed exclusively for Luxury Leisure Talarius and used to compile comprehensive local risk assessments that deal with the threats local issues may present to the licensing objectives. In this way, the measures we employ to mitigate identified risks are tailored to a specific venue.

Think 25- We operate a 'Think 25 policy' nationally and invest heavily in staff training and independent 'Test Purchasing' conducted by Serve Legal (a well-known and respected national company who work across all licencing sectors). As a result of our compliance policies and processes, in 2022 our test purchase pass rate was 94% compared with the rest of the AGC sector at 83% and the LBO sector at 89%. (Source: Serve Legal).

Crime- We have very few issues related to crime, disorder or anti-social behaviour and where we identify individuals involved in such, they are banned from all of our stores immediately.

Trade Bodies- We are members of the two multi-operator self-exclusion schemes (MOSES) that are available in the AGC sector, Smart Exclusion and the BACTA scheme so that those who wish to self-

exclude can do so from all of our premises and other AGC's in the locality. We take our responsibilities very seriously and are market leaders in social responsibility.

Player Protection- We also have installed in all of our venues, the technology to support Gamblewise, an application that allows customers to set themselves limits on the times and location they want to play and alerts them should they attend a location or visit a venue at a time or date when they have elected not to. The system also alerts staff who are trained to then conduct an interaction with the customer. We pay for this so it is free of charge for our customers to use.

Staff training and retention- Quality local management, staff, training and retention are our key strength, as this establishes strong and positive relationships with our customers, neighbours and local authorities, which ultimately leads to a solid reputation for responsible operating.

Alcohol- Alcohol is not served or consumed on any of our premises and we have robust policies and procedures in place to ensure our compliance with regards to both the law and the License Conditions and Codes of Practice so that those under the influence of alcohol cannot enter our premises.

Compliance- Our compliance with the Licence Conditions and Codes of Practice that govern the gambling sector was the subject of an in-depth Gambling Commission Corporate Assessment in 2019/2020. And we were the first UK operator to achieve the global G4 accreditation for social responsibility.

As a minimum standard, all of our stores have the following physical security measures and key security processes are recorded in a location security manual held on all sites and available on our company intranet.

CCTV - All of our stores are fitted with extensive CCTV coverage and are equipped with the latest HD cameras and digital recording equipment that ensure we retain a minimum of 28 days' footage. The CCTV can be viewed and reviewed remotely by key managers and security staff and in the event of an alarm activation is monitored live at the remote alarm monitoring station.

Intruder Alarm – All of our venues are fitted with an intruder alarm system and this is remotely monitored.

Hold-Up Alarm – We install and use 'live monitored' hold-up alarm systems in our venues. They use technologies that allow the monitoring station to view a venue where the alarm has been activated via a live CCTV stream and communicate with the venue staff through two-way audio. Monitoring station interventions often de-escalate incidents but if there is an emergency, then the call is made to the Police or other emergency service.

This has the impact of removing the risk of false activations and the demand on local police resource as well as enabling live monitoring of any event by trained staff who can intervene via the ceiling mounted speakers to assist staff by deterring potential offenders and de-escalating confrontational situations.

Safe system – Each of our stores utilises a system of ‘day safe’, time-lock safe and deposit safe to reduce the risk of cash loss in the event of a robbery or burglary.

Access Control –In most venues we install a ‘Maglock’ on the doors that can be turned on to control access in the evening or at night as required. This can be operated easily by our staff.

Third Party Cash in Transit (CIT) Service – Loomis, a professional and experienced CIT service provider, are contracted to service all of our stores with cash collection and coin delivery.

Staff Training- We train our staff to 'Know your customer'. This is an approach advocated by the Gambling Commission and has been adopted as a core tenet of our customer service provision ensuring that we operate in a way that is socially responsible by assisting our staff identify problem gambling and also minimising the risk of crimes such as theft, money laundering and fraud. There is a key focus on training, retraining and testing in these areas.

Trading Hours- We trade a significant number of businesses 24 hours a day due to the ever-increasing demands from our customers to have extended leisure time which is simply reflective of changing working patterns and the growing night-time economies in our large towns and cities.

Community Integration- Where they exist, we subscribe to and are active members of local town centre ‘shop watch’ type schemes, utilizing any radio networks and contributing to intelligence sharing.

Where we do operate in the late evening or at night we often recruit staff specifically for night working. All of our supervisors and above are required to supply a Disclosure and Barring Service (DBS) report and all of our staff receive training as part of their induction and also regular refresh training. At these stores, we constantly review the safety of both our customers and staff by providing door to door transport as required.

Mark Thompson
Risk and Compliance Director

Appendix 4 Email from LBH Planning Enforcement

Nuala Wheatley

From: Abiola Oloyede <Abiola.Oloyede@haringey.gov.uk>
Sent: 13 June 2023 13:02
To: Nuala Wheatley
Cc: Planning Support
Subject: RE: HGY/2021/0066 - 513 Green Lanes [LICH-DMS.FID433051]

CAUTION: This email originated from an external source.

Good afternoon Nuala

Sorry for the delay. No planning enforcement complaints have been received in relation to noise and antisocial behaviour at this address.

Kind Regards

Abiola

Abiola Oloyede

Planning Enforcement and Appeals Manager

Development Management | Placemaking and Housing | Haringey Council
Alexandra House 10 Station Road | London | N22 7TR

T. 020 8489 5593

E. abiola.loyede@haringey.gov.uk

Please note that the above is an officer's opinion only and does not prejudice any decisions that the Council may take.

From: Nuala Wheatley <nuala.wheatley@lichfields.uk>
Sent: 12 June 2023 10:32
To: Planning Support <PlanningSupport@haringey.gov.uk>
Cc: Dennis Pope <dennis.pope@lichfields.uk>
Subject: RE: HGY/2021/0066 - 513 Green Lanes [LICH-DMS.FID433051]

Hi James,

We haven't had a response from Planning Enforcement or ENV Health. Are you able to chase?

Thanks
Nuala

Nuala Wheatley
Senior Planner

Lichfields, The Minster Building, 21 Mincing Lane, London EC3R 7AG
T 020 7837 4477 / M 07384517089
E nuala.wheatley@lichfields.uk

Lichfields.uk

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Nathaniel Lichfield & Partners Limited (trading as "Lichfields") is registered in England, no. 2778116, registered office at The Minster Building, 21 Mincing Lane, London EC3R 7AG.

From: Planning Support <PlanningSupport@haringey.gov.uk>
Sent: Tuesday, May 30, 2023 12:39 PM
To: Nuala Wheatley <nuala.wheatley@lichfields.uk>
Cc: Dennis Pope <dennis.pope@lichfields.uk>
Subject: RE: HGY/2021/0066 - 513 Green Lanes [LICH-DMS.FID433051]

CAUTION: This email originated from an external source.
Good afternoon Nuala, I hope you're well.

Many thanks for your enquiry. I've forwarded it to our Planning Enforcement and Environmental Health ASB Teams for them to respond to you.

Kind regards,

James.

James Argles
Development Management Support Team
Placemaking and Housing | Haringey Council
5th Floor Alexandra House, 10 Station Road, Wood Green, London N22 7TR.

T. 0208 489 5567
james.argles@haringey.gov.uk

www.haringey.gov.uk
[twitter@haringeycouncil](https://twitter.com/haringeycouncil)
facebook.com/haringeycouncil



CLICK HERE to see our revised
Community Infrastructure Levy (CIL)

From: Nuala Wheatley <nuala.wheatley@lichfields.uk>
Sent: 30 May 2023 12:36
To: Planning Support <planningsupport@haringey.gov.uk>
Cc: Dennis Pope <dennis.pope@lichfields.uk>
Subject: HGY/2021/0066 - 513 Green Lanes [LICH-DMS.FID433051]

FAO: Environmental Health/Protection – please forward on to the relevant officer or department.

Dear Sir/Madam,

We write in relation to 513 Green Lanes, N4 1AP.

We act on behalf of Luxury Leisure, who operate the Admiral Adult Gaming Centre (AGC) from this premises.

We are currently undertaking research on behalf of our client in relation to the operation of their AGCs. In particular whether your Council have received any noise or anti-social behaviour related complaints in relation to this particular AGC and whether as a consequence this has involved the need for any action to been taken on your part.

We would be grateful therefore if you could confirm the above.

Kind regards,
Nuala

Nuala Wheatley
Senior Planner

Lichfields, The Minster Building, 21 Mincing Lane, London EC3R 7AG
T 020 7837 4477 / M 07384517089
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Appendix 5 Survey Data of Visitor Numbers

Average Across All Stores

North West

Average across stores Sun-Thur (2:00am-9:00am)	Average across stores Fri-Sat (2:00am-9:00am)
2.30	3.06

AGC 1	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)	Averages	Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	12	13	12		17	9	8.27	11.81
	TUESDAY	13	16	10					
	WEDNESDAY	8	11	5					
	THURSDAY	13	19	9					
	FRIDAY	16	20	12					
	SATURDAY	16	21	11					
	SUNDAY	12	19	7					
AGC 1	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)	Averages	Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	11	20	5		19	9	7.78	10.38
	TUESDAY	12	16	7					
	WEDNESDAY	11	15	8					
	THURSDAY	13	19	9					
	FRIDAY	16	23	10					
	SATURDAY	13	15	11					
	SUNDAY	16	23	10					

AGC 2	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)	Averages	Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	5	2		3	1	1.20	0.94
	TUESDAY	1	2	1					
	WEDNESDAY	1	2	1					
	THURSDAY	2	3	2					
	FRIDAY	2	4	1					
	SATURDAY	1	2	1					
	SUNDAY	2	3	1					
AGC 2	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)	Averages	Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	0	0	0		1	1	0.53	0.75
	TUESDAY	1	2	1					
	WEDNESDAY	1	3	0					
	THURSDAY	1	1	1					
	FRIDAY	1	1	1					
	SATURDAY	1	2	0					
	SUNDAY	1	1	1					

<u>AGC 3</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	2	1					
	TUESDAY	2	4	0					
	WEDNESDAY	3	3	3					
	THURSDAY	1	2	1					
	FRIDAY	2	4	1					
	SATURDAY	1	1	1					
	SUNDAY	1	2	0					
<u>AGC 3</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	4	0					
	TUESDAY	2	4	2					
	WEDNESDAY	2	4	1					
	THURSDAY	2	4	1					
	FRIDAY	2	3	1					
	SATURDAY	1	2	1					
	SUNDAY	2	2	1					
					Averages	3	1	1.05	0.88

<u>AGC 4</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	5	1					
	TUESDAY	3	6	1					
	WEDNESDAY	4	6	3					
	THURSDAY	2	4	1					
	FRIDAY	3	5	2					
	SATURDAY	4	5	2					
	SUNDAY	4	4	3					
<u>AGC 4</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	5	2					
	TUESDAY	4	6	2					
	WEDNESDAY	4	5	3					
	THURSDAY	2	3	1					
	FRIDAY	2	3	2					
	SATURDAY	3	6	1					
	SUNDAY	3	4	2					
					Averages	5	2	1.63	2.38

AGC 5	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	10	2	Averages	7	2	1.85	3.25
	TUESDAY	2	3	1					
	WEDNESDAY	4	5	3					
	THURSDAY	5	9	2					
	FRIDAY	5	6	5					
	SATURDAY	5	9	2					
	SUNDAY	3	6	1					
AGC 5	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	3	1	Averages	6	2	1.90	2.13
	TUESDAY	3	4	2					
	WEDNESDAY	5	9	3					
	THURSDAY	2	3	2					
	FRIDAY	4	7	3					
	SATURDAY	5	8	2					
	SUNDAY	6	10	3					

AGC 6	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	4	0	Averages	4	1	0.98	1.38
	TUESDAY	2	3	1					
	WEDNESDAY	3	6	0					
	THURSDAY	2	3	2					
	FRIDAY	3	5	1					
	SATURDAY	4	6	2					
	SUNDAY	2	1	2					
AGC 6	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	5	2	Averages	4	1	1.38	1.44
	TUESDAY	2	3	1					
	WEDNESDAY	3	6	1					
	THURSDAY	2	2	2					
	FRIDAY	2	4	0					
	SATURDAY	2	2	3					
	SUNDAY	2	3	1					

<u>AGC 7</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	6	2					
	TUESDAY	3	4	2					
	WEDNESDAY	4	8	2					
	THURSDAY	3	6	1					
	FRIDAY	4	8	2					
	SATURDAY	3	5	2					
	SUNDAY	3	5	1					
<u>AGC 7</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	1	3	0					
	TUESDAY	4	9	0					
	WEDNESDAY	1	2	0					
	THURSDAY	2	4	1					
	FRIDAY	2	2	3					
	SATURDAY	2	3	2					
	SUNDAY	1	2	0					
					Averages	6	2	1.43	2.13
					Averages	4	1	0.38	2.19

<u>AGC 8</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	1	2	1					
	TUESDAY	2	3	1					
	WEDNESDAY	1	2	0					
	THURSDAY	1	2	1					
	FRIDAY	2	4	1					
	SATURDAY	2	4	1					
	SUNDAY	3	6	1					
<u>AGC 8</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	5	1					
	TUESDAY	3	4	3					
	WEDNESDAY	2	3	1					
	THURSDAY	3	3	3					
	FRIDAY	2	2	2					
	SATURDAY	2	2	1					
	SUNDAY	1	2	0					
					Averages	3	1	0.81	1.00
					Averages	3	2	1.49	1.63

<u>AGC 9</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	12	15	7					
	TUESDAY	8	15	4					
	WEDNESDAY	4	6	2					
	THURSDAY	6	10	2					
	FRIDAY	4	7	2					
	SATURDAY	9	13	6					
	SUNDAY	10	18	4					
<u>AGC 9</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	11	15	6					
	TUESDAY	7	13	3					
	WEDNESDAY	6	9	3					
	THURSDAY	9	15	4					
	FRIDAY	8	11	5					
	SATURDAY	9	11	6					
	SUNDAY	16	18	14					
					Averages	12	4	3.65	4.13

<u>AGC 10</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	1	2	0					
	TUESDAY	1	2	1					
	WEDNESDAY	2	3	1					
	THURSDAY	2	3	1					
	FRIDAY	2	3	1					
	SATURDAY	2	3	2					
	SUNDAY	2	2	2					
<u>AGC 10</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	5	1					
	TUESDAY	1	1	1					
	WEDNESDAY	2	2	2					
	THURSDAY	2	3	2					
	FRIDAY	2	4	2					
	SATURDAY	1	2	1					
	SUNDAY	2	3	1					
					Averages	3	1	0.93	1.31

<u>AGC 11</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	6	0	Averages	5	1	0.88	0.13
	TUESDAY	2	3	2					
	WEDNESDAY	2	4	1					
	THURSDAY	2	5	1					
	FRIDAY	2	4	0					
	SATURDAY	3	7	0					
	SUNDAY	4	7	1					
<u>AGC 11</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	3	1	Averages	5	1	1.35	0.44
	TUESDAY	1	2	0					
	WEDNESDAY	6	8	4					
	THURSDAY	3	4	2					
	FRIDAY	3	6	1					
	SATURDAY	3	7	0					
	SUNDAY	3	5	1					

<u>AGC 12</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	5	1	Averages	4	1	0.94	0.88
	TUESDAY	2	3	1					
	WEDNESDAY	2	4	1					
	THURSDAY	1	1	1					
	FRIDAY	2	3	1					
	SATURDAY	3	6	1					
	SUNDAY	3	6	1					
<u>AGC 12</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	6	1	Averages	6	2	1.65	3.19
	TUESDAY	3	4	2					
	WEDNESDAY	3	5	1					
	THURSDAY	4	6	3					
	FRIDAY	6	10	4					
	SATURDAY	5	7	3					
	SUNDAY	2	3	2					

<u>AGC 13</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm- 1am)	Average per hour, per day (2am- 9am)	Averages	Average per hour 8pm- 1:00am (Mon- Sun)	Average per hour 2:00am - 9:00am (Mon- Sun)	Sun-Thur (2:00am- 9:00am)	Fri-Sat (2:00am- 9:00am)
	MONDAY	4	4	2		5	2	1.50	2.80
	TUESDAY	4	7	2					
	WEDNESDAY	2	3	1					
	THURSDAY	2	3	1					
	FRIDAY	4	7	3					
	SATURDAY	4	6	3					
	SUNDAY	2	4	1					
<u>AGC 13</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm- 1am)	Average per hour, per day (2am- 9am)	Averages	Average per hour 8pm- 1:00am (Mon- Sun)	Average per hour 2:00am - 9:00am (Mon- Sun)	Sun-Thur (2:00am- 9:00am)	Fri-Sat (2:00am- 9:00am)
	MONDAY	1	1	1		4	2	1.96	2.23
	TUESDAY	4	5	2					
	WEDNESDAY	2	2	1					
	THURSDAY	4	5	3					
	FRIDAY	3	4	2					
	SATURDAY	4	7	2					
	SUNDAY	3	5	2					

<u>AGC 14</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm- 1am)	Average per hour, per day (2am- 9am)	Averages	Average per hour 8pm- 1:00am (Mon- Sun)	Average per hour 2:00am - 9:00am (Mon- Sun)	Sun-Thur (2:00am- 9:00am)	Fri-Sat (2:00am- 9:00am)
	MONDAY	2	2	2		2	2	1.80	1.14
	TUESDAY	3	3	2					
	WEDNESDAY	2	2	1					
	THURSDAY	2	2	2					
	FRIDAY	1	2	1					
	SATURDAY	2	3	1					
	SUNDAY	1	1	2					
<u>AGC 14</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm- 1am)	Average per hour, per day (2am- 9am)	Averages	Average per hour 8pm- 1:00am (Mon- Sun)	Average per hour 2:00am - 9:00am (Mon- Sun)	Sun-Thur (2:00am- 9:00am)	Fri-Sat (2:00am- 9:00am)
	MONDAY	1	1	2		2	2	1.50	1.67
	TUESDAY	2	2	1					
	WEDNESDAY	2	3	2					
	THURSDAY	2	3	1					
	FRIDAY	2	2	2					
	SATURDAY	2	2	1					
	SUNDAY	1	1	#DIV/0!					

<u>AGC 15</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)	Averages	Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	5	1		4	2	1.60	1.69
	TUESDAY	2	2	1					
	WEDNESDAY	1	2	1					
	THURSDAY	5	5	4					
	FRIDAY	3	5	2					
	SATURDAY	2	3	2					
	SUNDAY	3	5	2					
<u>AGC 15</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)	Averages	Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	5	1		4	2	1.78	3.56
	TUESDAY	2	4	2					
	WEDNESDAY	3	4	3					
	THURSDAY	3	5	2					
	FRIDAY	5	6	5					
	SATURDAY	4	6	2					
	SUNDAY	2	3	2					

Midlands

<u>AGC 1</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)	Averages	Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	3	2		4	2	1.60	1.94
	TUESDAY	2	3	1					
	WEDNESDAY	3	3	2					
	THURSDAY	3	5	3					
	FRIDAY	3	6	2					
	SATURDAY	4	6	2					
	SUNDAY	3	4	1					
<u>AGC 1</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)	Averages	Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	4	1		3	2	1.48	2.19
	TUESDAY	3	4	2					
	WEDNESDAY	2	4	0					
	THURSDAY	2	2	1					
	FRIDAY	2	2	1					
	SATURDAY	4	6	3					
	SUNDAY	3	3	4					

AGC 2	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	3	1					
	TUESDAY	3	5	2					
	WEDNESDAY	2	3	1					
	THURSDAY	3	5	1					
	FRIDAY	5	8	3					
	SATURDAY	5	7	3					
	SUNDAY	2	3	1					
AGC 2	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	1	1	1					
	TUESDAY	2	2	2					
	WEDNESDAY	3	4	2					
	THURSDAY	3	5	2					
	FRIDAY	5	8	3					
	SATURDAY	6	10	4					
	SUNDAY	2	4	1					
					Averages	5	2	0.95	3.00
					Averages	5	2	1.43	3.38

AGC 3	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	7	3					
	TUESDAY	7	7	6					
	WEDNESDAY	6	9	3					
	THURSDAY	5	8	3					
	FRIDAY	6	8	4					
	SATURDAY	3	3	3					
	SUNDAY	6	8	4					
AGC 3	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	8	1					
	TUESDAY	6	9	4					
	WEDNESDAY	4	5	4					
	THURSDAY	5	9	3					
	FRIDAY	6	7	4					
	SATURDAY	6	8	5					
	SUNDAY	4	6	3					
					Averages	7	4	3.73	3.50
					Averages	7	3	2.88	4.75

AGC 4		Average per hour each day (8pm - 9am)	Average per hour, per day (8pm- 1am)	Average per hour, per day (2am- 9am)		Average per hour 8pm- 1:00am (Mon- Sun)	Average per hour 2:00am - 9:00am (Mon- Sun)	Sun-Thur (2:00am- 9:00am)	Fri-Sat (2:00am- 9:00am)
	Week 1 comm 10/01/22								
	MONDAY	2	3	1					
	TUESDAY	5	7	3					
	WEDNESDAY	2	3	1					
	THURSDAY	4	7	2					
	FRIDAY	4	7	3					
	SATURDAY	5	8	3					
	SUNDAY	3	4	2					
AGC 4		Average per hour each day (8pm - 9am)	Average per hour, per day (8pm- 1am)	Average per hour, per day (2am- 9am)		Average per hour 8pm- 1:00am (Mon- Sun)	Average per hour 2:00am - 9:00am (Mon- Sun)	Sun-Thur (2:00am- 9:00am)	Fri-Sat (2:00am- 9:00am)
	Week 2 comm 17/01/22								
	MONDAY	2	4	2					
	TUESDAY	3	4	2					
	WEDNESDAY	3	3	3					
	THURSDAY	4	8	1					
	FRIDAY	3	6	2					
	SATURDAY	5	8	2					
	SUNDAY	2	4	1					
					Averages	6	2	1.78	2.81
					Averages	5	2	1.48	1.88

AGC 5		Average per hour each day (8pm - 9am)	Average per hour, per day (8pm- 1am)	Average per hour, per day (2am- 9am)		Average per hour 8pm- 1:00am (Mon- Sun)	Average per hour 2:00am - 9:00am (Mon- Sun)	Sun-Thur (2:00am- 9:00am)	Fri-Sat (2:00am- 9:00am)
	Week 1 comm 10/01/22								
	MONDAY	3	4	0					
	TUESDAY	2	2	1					
	WEDNESDAY	3	3	3					
	THURSDAY	4	5	0					
	FRIDAY	2	5	1					
	SATURDAY	2	3	2					
	SUNDAY	2	2	2					
AGC 5		Average per hour each day (8pm - 9am)	Average per hour, per day (8pm- 1am)	Average per hour, per day (2am- 9am)		Average per hour 8pm- 1:00am (Mon- Sun)	Average per hour 2:00am - 9:00am (Mon- Sun)	Sun-Thur (2:00am- 9:00am)	Fri-Sat (2:00am- 9:00am)
	Week 2 comm 17/01/22								
	MONDAY	3	4	2					
	TUESDAY	2	3	2					
	WEDNESDAY	3	3	1					
	THURSDAY	2	4	1					
	FRIDAY	3	6	2					
	SATURDAY	3	5	2					
	SUNDAY	2	2	2					
					Averages	3	1	1.33	1.44
					Averages	4	2	1.69	1.75

AGC 6		Average per hour each day (8pm - 9am)	Average per hour, per day (8pm- 1am)	Average per hour, per day (2am- 9am)		Average per hour 8pm- 1:00am (Mon- Sun)	Average per hour 2:00am - 9:00am (Mon- Sun)	Sun-Thur (2:00am- 9:00am)	Fri-Sat (2:00am- 9:00am)
	Week 1 comm 10/01/22								
	MONDAY	5	6	2					
	TUESDAY	4	4	5					
	WEDNESDAY	8	11	4					
	THURSDAY	6	7	5					
	FRIDAY	7	7	7					
	SATURDAY	7	10	5					
	SUNDAY	8	11	4					
AGC 6		Average per hour each day (8pm - 9am)	Average per hour, per day (8pm- 1am)	Average per hour, per day (2am- 9am)		Average per hour 8pm- 1:00am (Mon- Sun)	Average per hour 2:00am - 9:00am (Mon- Sun)	Sun-Thur (2:00am- 9:00am)	Fri-Sat (2:00am- 9:00am)
	Week 2 comm 17/01/22								
	MONDAY	5	5	5					
	TUESDAY	6	9	3					
	WEDNESDAY	8	8	9					
	THURSDAY	7	10	5					
	FRIDAY	9	10	8					
	SATURDAY	11	11	12					
	SUNDAY	6	7	5					
					Averages	8	4	3.79	5.75
					Averages	8	6	4.88	9.88

AGC 7		Average per hour each day (8pm - 9am)	Average per hour, per day (8pm- 1am)	Average per hour, per day (2am- 9am)		Average per hour 8pm- 1:00am (Mon- Sun)	Average per hour 2:00am - 9:00am (Mon- Sun)	Sun-Thur (2:00am- 9:00am)	Fri-Sat (2:00am- 9:00am)
	Week 1 comm 10/01/22								
	MONDAY	3	8	0					
	TUESDAY	5	8	3					
	WEDNESDAY	4	8	1					
	THURSDAY	2	5	1					
	FRIDAY	4	7	1					
	SATURDAY	5	9	3					
	SUNDAY	3	6	1					
AGC 7		Average per hour each day (8pm - 9am)	Average per hour, per day (8pm- 1am)	Average per hour, per day (2am- 9am)		Average per hour 8pm- 1:00am (Mon- Sun)	Average per hour 2:00am - 9:00am (Mon- Sun)	Sun-Thur (2:00am- 9:00am)	Fri-Sat (2:00am- 9:00am)
	Week 2 comm 17/01/22								
	MONDAY	3	5	2					
	TUESDAY	2	3	1					
	WEDNESDAY	6	10	3					
	THURSDAY	2	4	0					
	FRIDAY	4	7	2					
	SATURDAY	6	10	3					
	SUNDAY	6	13	0					
					Averages	7	1	1.08	2.19
					Averages	7	1	1.13	2.31

<u>AGC 8</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	3	2	Averages	3	1	0.42	1.63
	TUESDAY	2	5	0					
	WEDNESDAY	1	1	0					
	THURSDAY	1	2	1					
	FRIDAY	3	4	3					
	SATURDAY	3	5	1					
	SUNDAY	0	1	0					
<u>AGC 8</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	3	0	Averages	5	0	0.22	1.06
	TUESDAY	3	4	0					
	WEDNESDAY	1	1	0					
	THURSDAY	2	5	0					
	FRIDAY	3	6	2					
	SATURDAY	4	9	1					
	SUNDAY	3	6	0					

East of England

<u>AGC 1</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	8	11	6	Averages	14	6	6.22	5.63
	TUESDAY	11	14	7					
	WEDNESDAY	7	13	3					
	THURSDAY	11	14	9					
	FRIDAY	11	21	4					
	SATURDAY	10	14	7					
	SUNDAY	9	12	7					
<u>AGC 1</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	9	11	8	Averages	14	7	7.09	6.38
	TUESDAY	11	14	4					
	WEDNESDAY	10	13	7					
	THURSDAY	8	10	7					
	FRIDAY	10	18	4					
	SATURDAY	13	18	9					
	SUNDAY	9	11	8					

London and the South East

AGC 1	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	3	2					
	TUESDAY	2	4	0					
	WEDNESDAY	3	5	1					
	THURSDAY	4	6	3					
	FRIDAY	5	9	1					
	SATURDAY	6	11	3					
	SUNDAY	3	6	1					
AGC 1	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	8	2					
	TUESDAY	3	4	2					
	WEDNESDAY	5	10	2					
	THURSDAY	3	4	3					
	FRIDAY	6	10	3					
	SATURDAY	7	9	5					
	SUNDAY	6	10	3					
					Averages	6	1	1.18	2.19
						Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
					Averages	8	3	2.00	4.00

AGC 2	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	0	0	#DIV/0!					
	TUESDAY	1	1	#DIV/0!					
	WEDNESDAY	2	2	#DIV/0!					
	THURSDAY	1	1	1					
	FRIDAY	1	1	1					
	SATURDAY	1	3	0					
	SUNDAY								
AGC 2	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	0	0	#DIV/0!					
	TUESDAY	1	1	#DIV/0!					
	WEDNESDAY	0	0	#DIV/0!					
	THURSDAY	1	1	#DIV/0!					
	FRIDAY	1	2	0					
	SATURDAY	1	1	0					
	SUNDAY	0	#DIV/0!	#DIV/0!					
					Averages	1	1	0.75	0.50
						Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
					Averages	1	0	#DIV/0!	0.06

AGC 3	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	5	2					
	TUESDAY	6	7	5					
	WEDNESDAY	2	3	1					
	THURSDAY	4	4	3					
	FRIDAY	4	5	4					
	SATURDAY	7	11	4					
	SUNDAY	5	9	3					
AGC 3	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	7	4					
	TUESDAY	3	3	3					
	WEDNESDAY	3	5	1					
	THURSDAY	3	4	3					
	FRIDAY	6	10	3					
	SATURDAY	5	8	3					
	SUNDAY	5	5	4					
					Averages	6	3	2.88	3.94
					Averages	6	3	2.98	2.94

AGC 4	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	7	10	5					
	TUESDAY	9	14	5					
	WEDNESDAY	7	12	4					
	THURSDAY	8	12	6					
	FRIDAY	11	13	9					
	SATURDAY	13	14	13					
	SUNDAY	8	13	4					
AGC 4	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	7	12	4					
	TUESDAY	7	12	4					
	WEDNESDAY	8	13	4					
	THURSDAY	9	12	7					
	FRIDAY	14	21	9					
	SATURDAY	9	14	5					
	SUNDAY	8	11	7					
					Averages	12	6	4.65	11.00
					Averages	14	6	5.20	6.56

AGC 5	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	8	9	4					
	TUESDAY	3	3	0					
	WEDNESDAY	5	6	3					
	THURSDAY	3	4	2					
	FRIDAY	4	7	2					
	SATURDAY	2	4	1					
	SUNDAY	5	5						
AGC 5	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	5	0					
	TUESDAY	5	6	0					
	WEDNESDAY	2	3	0					
	THURSDAY	2	5	0					
	FRIDAY	2	3	1					
	SATURDAY	4	9	1					
	SUNDAY	3	5	0					
					Averages	5	1	1.73	1.19
					Averages	5	0	0.00	0.63

AGC 6	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	2	1					
	TUESDAY	2	5	1					
	WEDNESDAY	2	4	0					
	THURSDAY	3	5	2					
	FRIDAY	3	5	2					
	SATURDAY	2	3	2					
	SUNDAY	2	4	0					
AGC 6	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	3	1					
	TUESDAY	2	3	1					
	WEDNESDAY	2	4	1					
	THURSDAY	2	4	1					
	FRIDAY	3	5	1					
	SATURDAY	2	4	1					
	SUNDAY	2	3	1					
					Averages	4	1	0.90	1.81
					Averages	4	1	0.83	1.06

<u>AGC 7</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	8	2					
	TUESDAY	5	9	2					
	WEDNESDAY	4	6	3					
	THURSDAY	6	9	3					
	FRIDAY	6	11	3					
	SATURDAY	7	13	2					
	SUNDAY	6	10	3					
<u>AGC 7</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	7	3					
	TUESDAY	3	7	1					
	WEDNESDAY	5	7	3					
	THURSDAY	6	10	0					
	FRIDAY	3	5	0					
	SATURDAY	6	9	4					
	SUNDAY	8	13	3					
					Averages	9	3	2.68	2.38
					Averages	8	2	2.14	2.50

<u>AGC 8</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	3	1					
	TUESDAY	2	3	1					
	WEDNESDAY	1	3	1					
	THURSDAY	2	3	2					
	FRIDAY	3	5	1					
	SATURDAY	3	5	2					
	SUNDAY	3	6	1					
<u>AGC 8</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	3	4					
	TUESDAY	3	5	2					
	WEDNESDAY	3	5	2					
	THURSDAY	1	3	0					
	FRIDAY	1	2	0					
	SATURDAY	4	8	2					
	SUNDAY	4	7	2					
					Averages	4	1	1.08	1.81
					Averages	5	2	1.93	0.94

<u>AGC 9</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	6	11	2					
	TUESDAY	5	9	3					
	WEDNESDAY	7	12	4					
	THURSDAY	5	11	1					
	FRIDAY	4	5	4					
	SATURDAY	7	14	2					
	SUNDAY	3	5	1					
<u>AGC 9</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	6	1					
	TUESDAY	4	4	3					
	WEDNESDAY	7	10	5					
	THURSDAY	4	7	3					
	FRIDAY	7	13	3					
	SATURDAY	9	12	6					
	SUNDAY	4	7	2					
					Averages	9	2	2.10	3.00
					Averages	8	3	2.70	4.81

<u>AGC 10</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	8	8	8					
	TUESDAY	5	6	5					
	WEDNESDAY	5	6	3					
	THURSDAY	5	7	3					
	FRIDAY	5	8	3					
	SATURDAY	6	9	3					
	SUNDAY	3	4	2					
<u>AGC 10</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	6	2					
	TUESDAY	3	6	2					
	WEDNESDAY	5	5	3					
	THURSDAY	7	9	6					
	FRIDAY	7	10	4					
	SATURDAY	6	8	5					
	SUNDAY	2	3	1					
					Averages	7	4	4.26	3.19
					Averages	7	3	2.56	4.38

<u>AGC 11</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	4	0					
	TUESDAY	2	3	1					
	WEDNESDAY	2	3	1					
	THURSDAY	1	3	1					
	FRIDAY	4	7	1					
	SATURDAY	6	10	3					
	SUNDAY	3	6	1					
<u>AGC 11</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	4	1					
	TUESDAY	3	6	1					
	WEDNESDAY	2	3	1					
	THURSDAY	2	3	1					
	FRIDAY	4	8	1					
	SATURDAY	5	7	3					
	SUNDAY	2	4	2					
					Averages	5	1	0.65	1.75
					Averages	5	1	1.13	2.06

<u>AGC 12</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	12	15	10					
	TUESDAY	10	11	9					
	WEDNESDAY	9	14	5					
	THURSDAY	8	11	5					
	FRIDAY	7	10	5					
	SATURDAY	10	11	9					
	SUNDAY	9	12	7					
<u>AGC 12</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	9	12	7					
	TUESDAY	11	13	9					
	WEDNESDAY	6	6	6					
	THURSDAY	7	8	6					
	FRIDAY	14	16	13					
	SATURDAY	7	9	5					
	SUNDAY	10	12	9					
					Averages	12	7	6.94	6.81
					Averages	11	8	7.11	9.13

<u>AGC 13</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	5	4	Averages	4	4	4.64	3.81
	TUESDAY	5	4	5					
	WEDNESDAY	3	2	4					
	THURSDAY	6	4	8					
	FRIDAY	5	5	5					
	SATURDAY	4	6	3					
	SUNDAY	3	4	3					
<u>AGC 13</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	4	4	Averages	5	5	5.28	4.63
	TUESDAY	5	5	6					
	WEDNESDAY	5	5	6					
	THURSDAY	6	7	6					
	FRIDAY	5	5	4					
	SATURDAY	5	5	5					
	SUNDAY	5	6	5					

<u>AGC 14</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	8	1	Averages	8	2	1.35	2.00
	TUESDAY	4	7	2					
	WEDNESDAY	4	7	1					
	THURSDAY	4	8	1					
	FRIDAY	6	11	2					
	SATURDAY	5	8	2					
	SUNDAY	3	5	2					
<u>AGC 14</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	6	4	Averages	7	3	2.43	3.88
	TUESDAY	3	5	1					
	WEDNESDAY	4	5	3					
	THURSDAY	4	8	2					
	FRIDAY	5	9	2					
	SATURDAY	8	10	5					
	SUNDAY	3	4	3					

<u>AGC 15</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	6	4	Averages	7	6	5.81	5.63
	TUESDAY	5	6	5					
	WEDNESDAY	6	6	5					
	THURSDAY	7	7	7					
	FRIDAY	6	7	6					
	SATURDAY	6	6	6					
	SUNDAY	8	9	7					
<u>AGC 15</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	4	7	Averages	5	5	5.25	5.81
	TUESDAY	6	7	6					
	WEDNESDAY	4	4	5					
	THURSDAY	5	5	5					
	FRIDAY	6	6	6					
	SATURDAY	6	5	6					
	SUNDAY	6	7	5					

<u>AGC 16</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	9	9	8	Averages	12	5	4.08	6.94
	TUESDAY	7	12	4					
	WEDNESDAY	5	5	4					
	THURSDAY	5	8	3					
	FRIDAY	11	15	8					
	SATURDAY	12	19	6					
	SUNDAY	9	15	4					
<u>AGC 16</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	5	2	Averages	11	5	3.63	7.00
	TUESDAY	5	9	1					
	WEDNESDAY	5	8	3					
	THURSDAY	7	9	5					
	FRIDAY	11	13	10					
	SATURDAY	9	15	5					
	SUNDAY	11	17	6					

<u>AGC 17</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	6	8	3					
	TUESDAY	5	10	1					
	WEDNESDAY	4	8	2					
	THURSDAY	4	7	2					
	FRIDAY	9	15	5					
	SATURDAY	8	12	6					
	SUNDAY	4	7	1					
<u>AGC 17</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	4	3					
	TUESDAY	4	9	1					
	WEDNESDAY	3	6	1					
	THURSDAY	3	5	2					
	FRIDAY	7	12	4					
	SATURDAY	7	12	3					
	SUNDAY	4	7	1					
					Averages	9	3	1.69	5.19
					Averages	8	2	1.42	3.38

<u>AGC 18</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	6	7	5					
	TUESDAY	2	1	2					
	WEDNESDAY	3	6	1					
	THURSDAY	4	7	1					
	FRIDAY	3	6	1					
	SATURDAY	5	8	3					
	SUNDAY	1	1	2					
<u>AGC 18</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	3	1					
	TUESDAY	2	4	1					
	WEDNESDAY	1	2	1					
	THURSDAY	2	4	1					
	FRIDAY	4	3	5					
	SATURDAY	4	5	3					
	SUNDAY	4	5	3					
					Averages	5	2	1.83	2.31
					Averages	4	2	1.25	4.06

<u>AGC 19</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	6	10	4	Averages	8	3	2.69	4.94
	TUESDAY	5	9	2					
	WEDNESDAY	7	11	1					
	THURSDAY	5	9	3					
	FRIDAY	4	3	5					
	SATURDAY	5	6	5					
	SUNDAY	6	9	3					
<u>AGC 19</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	5	2	Averages	7	2	2.42	1.75
	TUESDAY	5	9	3					
	WEDNESDAY	8	9	6					
	THURSDAY	5	8	2					
	FRIDAY	5	7	3					
	SATURDAY	3	7	0					
	SUNDAY	3	5	1					

<u>AGC 20</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	8	2	Averages	10	4	3.86	4.75
	TUESDAY	7	8	7					
	WEDNESDAY	7	10	4					
	THURSDAY	6	11	3					
	FRIDAY	6	10	4					
	SATURDAY	8	10	6					
	SUNDAY	8	11	5					
<u>AGC 20</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	8	2	Averages	10	4	2.77	6.06
	TUESDAY	6	7	2					
	WEDNESDAY	6	9	4					
	THURSDAY	7	10	4					
	FRIDAY	7	10	4					
	SATURDAY	12	17	8					
	SUNDAY	4	9	1					

<u>AGC 21</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	7	10	5	Averages	7	2	2.49	2.13
	TUESDAY	2	4	1					
	WEDNESDAY	6	8	3					
	THURSDAY	3	5	1					
	FRIDAY	4	6	2					
	SATURDAY	4	8	2					
	SUNDAY	4	7	2					
<u>AGC 21</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	6	4	Averages	6	2	2.65	2.00
	TUESDAY	4	5	3					
	WEDNESDAY	4	5	2					
	THURSDAY	4	7	2					
	FRIDAY	5	9	2					
	SATURDAY	4	8	2					
	SUNDAY	3	6	2					

<u>AGC 22</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	6	1	Averages	8	3	2.65	2.50
	TUESDAY	6	7	6					
	WEDNESDAY	7	13	3					
	THURSDAY	4	7	2					
	FRIDAY	7	11	4					
	SATURDAY	2	4	2					
	SUNDAY	4	7	2					
<u>AGC 22</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	3	2	Averages	7	2	2.43	1.94
	TUESDAY	5	6	3					
	WEDNESDAY	6	10	4					
	THURSDAY	5	7	3					
	FRIDAY	6	11	2					
	SATURDAY	6	11	2					
	SUNDAY	3	5	1					

<u>AGC 23</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	7	3	Averages	6	3	2.84	2.13
	TUESDAY	4	6	2					
	WEDNESDAY	8	12	6					
	THURSDAY	4	7	1					
	FRIDAY	5	9	2					
	SATURDAY	3	3	2					
	SUNDAY	2	2	2					
<u>AGC 23</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	6	10	3	Averages	6	4	4.05	3.00
	TUESDAY	5	6	5					
	WEDNESDAY	6	5	7					
	THURSDAY	4	5	2					
	FRIDAY	5	6	4					
	SATURDAY	3	4	2					
	SUNDAY	4	4	3					

<u>AGC 24</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	2	2	Averages	4	2	1.89	3.31
	TUESDAY	2	4	1					
	WEDNESDAY	3	3	2					
	THURSDAY	4	5	3					
	FRIDAY	5	5	5					
	SATURDAY	4	6	2					
	SUNDAY	4	7	1					
<u>AGC 24</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	3	1	Averages	5	2	1.48	1.69
	TUESDAY	3	3	4					
	WEDNESDAY	3	6	1					
	THURSDAY	1	2	1					
	FRIDAY	5	9	2					
	SATURDAY	3	4	2					
	SUNDAY	2	5	1					

<u>AGC 25</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	1	1	1	Averages	2	1	0.73	0.69
	TUESDAY	0	0	0					
	WEDNESDAY	4	6	0					
	THURSDAY	1	2	1					
	FRIDAY	1	2	1					
	SATURDAY	2	4	0					
	SUNDAY	1	1	closed					
<u>AGC 25</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	1	2	0	Averages	3	1	0.45	0.63
	TUESDAY	2	2	0					
	WEDNESDAY	2	3	0					
	THURSDAY	2	4	1					
	FRIDAY	2	4	1					
	SATURDAY	2	4	0					
	SUNDAY	3	3	closed					

<u>AGC 26</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	4	1	Averages	3	1	0.92	0.63
	TUESDAY	1	2	0					
	WEDNESDAY	2	2	2					
	THURSDAY	1	2	1					
	FRIDAY	1	3	1					
	SATURDAY	2	5	1					
	SUNDAY	2	4	1					
<u>AGC 26</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	4	2	Averages	4	2	1.73	2.06
	TUESDAY	1	2	1					
	WEDNESDAY	3	5	1					
	THURSDAY	4	6	3					
	FRIDAY	2	3	2					
	SATURDAY	3	4	2					
	SUNDAY	3	4	2					

<u>AGC 27</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	6	2					
	TUESDAY	1	3	1					
	WEDNESDAY	2	3	1					
	THURSDAY	1	2	1					
	FRIDAY	4	6	2					
	SATURDAY	1	3	0					
	SUNDAY	0	0	0					
<u>AGC 27</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	1	1	1					
	TUESDAY	3	4	3					
	WEDNESDAY	4	4	3					
	THURSDAY	2	3	1					
	FRIDAY	3	3	2					
	SATURDAY	2	5	0					
	SUNDAY	4	6	2					
					Averages	3	1	0.74	1.13

<u>AGC 28</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	8	3					
	TUESDAY	4	5	3					
	WEDNESDAY	1	2	1					
	THURSDAY	4	6	3					
	FRIDAY	10	13	8					
	SATURDAY	7	11	4					
	SUNDAY	4	6	3					
<u>AGC 28</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	8	3					
	TUESDAY	6	8	2					
	WEDNESDAY	3	6	1					
	THURSDAY	4	9	1					
	FRIDAY	7	14	2					
	SATURDAY	6	12	2					
	SUNDAY	7	11	3					
					Averages	7	4	2.49	6.00

<u>AGC 29</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	6	8	3	Averages	6	2	2.56	2.13
	TUESDAY	2	3	1					
	WEDNESDAY	4	6	3					
	THURSDAY	2	2	2					
	FRIDAY	6	10	3					
	SATURDAY	3	5	1					
	SUNDAY	4	5	4					
<u>AGC 29</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	7	3	Averages	5	3	2.76	4.56
	TUESDAY	4	5	3					
	WEDNESDAY	4	7	2					
	THURSDAY	3	4	3					
	FRIDAY	7	9	6					
	SATURDAY	4	4	4					
	SUNDAY	3	3	3					

<u>AGC 30</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	10	10	9	Averages	10	5	5.17	5.88
	TUESDAY	9	11	6					
	WEDNESDAY	4	6	2					
	THURSDAY	7	10	5					
	FRIDAY	7	10	5					
	SATURDAY	9	12	6					
	SUNDAY	6	8	5					
<u>AGC 30</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	6	7	4	Averages	8	3	3.35	2.63
	TUESDAY	5	8	2					
	WEDNESDAY	1	3	0					
	THURSDAY	7	10	5					
	FRIDAY	6	10	2					
	SATURDAY	5	8	3					
	SUNDAY	7	8	5					

<u>AGC 31</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	5	1	Averages	5	2	1.86	3.31
	TUESDAY	3	6	2					
	WEDNESDAY	3	5	2					
	THURSDAY	3	4	2					
	FRIDAY	5	8	3					
	SATURDAY	4	5	4					
	SUNDAY	3	3	2					
<u>AGC 31</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	6	1	Averages	8	3	1.81	4.25
	TUESDAY	4	8	2					
	WEDNESDAY	4	8	2					
	THURSDAY	4	7	2					
	FRIDAY	5	7	3					
	SATURDAY	8	12	5					
	SUNDAY	5	8	3					

<u>AGC 32</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	5	2	Averages	6	3	2.97	4.19
	TUESDAY	3	4	2					
	WEDNESDAY	6	5	6					
	THURSDAY	4	5	3					
	FRIDAY	8	10	6					
	SATURDAY	4	5	3					
	SUNDAY	3	5	2					
<u>AGC 32</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	9	3	Averages	7	3	2.14	4.13
	TUESDAY	4	6	2					
	WEDNESDAY	4	6	2					
	THURSDAY	4	5	3					
	FRIDAY	5	10	2					
	SATURDAY	8	10	6					
	SUNDAY	3	6	2					

<u>AGC 33</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	8	15	3					
	TUESDAY	7	8	5					
	WEDNESDAY	7	11	5					
	THURSDAY	6	8	4					
	FRIDAY	8	11	6					
	SATURDAY	8	10	5					
	SUNDAY	5	9	2					
<u>AGC 33</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	7	10	4					
	TUESDAY	8	10	4					
	WEDNESDAY	6	8	4					
	THURSDAY	10	17	4					
	FRIDAY	8	13	5					
	SATURDAY	12	14	10					
	SUNDAY	7	11	4					
					Averages	10	4	3.58	5.63

<u>AGC 34</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	5	3					
	TUESDAY	5	6	5					
	WEDNESDAY	3	4	3					
	THURSDAY	5	7	3					
	FRIDAY	4	7	3					
	SATURDAY	8	11	6					
	SUNDAY	3	3	3					
<u>AGC 34</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	3	1					
	TUESDAY	2	4	1					
	WEDNESDAY	2	3	1					
	THURSDAY	3	4	2					
	FRIDAY	2	4	1					
	SATURDAY	5	9	2					
	SUNDAY	2	4	1					
					Averages	6	4	3.38	4.13

<u>AGC 35</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	6	4	Averages	8	3	3.29	3.75
	TUESDAY	11	11	9					
	WEDNESDAY	5	9	2					
	THURSDAY	4	7	2					
	FRIDAY	5	8	4					
	SATURDAY	5	6	4					
	SUNDAY	4	6	3					
<u>AGC 35</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	5	3	Averages	7	2	2.44	1.94
	TUESDAY	9	9	9					
	WEDNESDAY	4	8	1					
	THURSDAY	4	6	2					
	FRIDAY	6	10	3					
	SATURDAY	2	4	1					
	SUNDAY	4	5	2					

<u>AGC 36</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	3	1	Averages	4	2	1.60	1.63
	TUESDAY	2	3	0					
	WEDNESDAY	1	2	0					
	THURSDAY	4	6	3					
	FRIDAY	3	5	2					
	SATURDAY	2	3	2					
	SUNDAY	4	5	3					
<u>AGC 36</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	1	2	1	Averages	3	1	0.69	2.88
	TUESDAY	3	4	1					
	WEDNESDAY	2	3	1					
	THURSDAY	0	0	0					
	FRIDAY	4	8	1					
	SATURDAY	5	5	5					
	SUNDAY	1	2	0					

<u>AGC 37</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	4	2	Averages	3	1	0.89	2.25
	TUESDAY	1	2	0					
	WEDNESDAY	1	2	1					
	THURSDAY	2	2	1					
	FRIDAY	4	5	3					
	SATURDAY	2	2	2					
	SUNDAY	1	2	1					
<u>AGC 37</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	2	1	Averages	3	1	1.03	1.00
	TUESDAY	2	2	1					
	WEDNESDAY	2	4	1					
	THURSDAY	2	4	1					
	FRIDAY	2	2	1					
	SATURDAY	1	2	1					
	SUNDAY	1	2	1					

<u>AGC 38</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	6	4	Averages	8	3	3.56	2.13
	TUESDAY	5	8	3					
	WEDNESDAY	7	8	4					
	THURSDAY	6	7	4					
	FRIDAY	4	6	2					
	SATURDAY	7	14	2					
	SUNDAY	5	7	3					
<u>AGC 38</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	5	8	3	Averages	10	5	4.09	5.75
	TUESDAY	6	9	4					
	WEDNESDAY	8	8	6					
	THURSDAY	6	7	6					
	FRIDAY	8	10	6					
	SATURDAY	9	14	5					
	SUNDAY	7	11	4					

<u>AGC 39</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	3	2	Averages	5	2	1.83	2.13
	TUESDAY	3	6	2					
	WEDNESDAY	4	6	3					
	THURSDAY	4	7	2					
	FRIDAY	3	3	3					
	SATURDAY	3	5	1					
	SUNDAY	3	6	1					
<u>AGC 39</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	5	1	Averages	4	2	1.65	1.56
	TUESDAY	2	2	2					
	WEDNESDAY	5	8	2					
	THURSDAY	3	4	2					
	FRIDAY	3	4	2					
	SATURDAY	3	6	1					
	SUNDAY	2	2	2					

<u>AGC 40</u>	Week 1 comm 10/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	5	2	Averages	5	1	1.51	0.44
	TUESDAY	2	3	1					
	WEDNESDAY	5	6	3					
	THURSDAY	3	6	2					
	FRIDAY	3	6	0					
	SATURDAY	2	5	1					
	SUNDAY	4	8	0					
<u>AGC 40</u>	Week 2 comm 17/01/22	Average per hour each day (8pm - 9am)	Average per hour, per day (8pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	6	2	Averages	4	2	1.75	2.88
	TUESDAY	3	4	2					
	WEDNESDAY	2	2	2					
	THURSDAY	3	5	1					
	FRIDAY	3	5	2					
	SATURDAY	4	4	4					
	SUNDAY								

<u>AGC 41</u>	Week 1 comm 10/01/22	Average per hour each day (10pm - 9am)	Average per hour, per day (10pm-1am)	Average per hour, per day (2am-9am)		Average per hour 10pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	4	1					
	TUESDAY	1	2	1					
	WEDNESDAY	1	1	1					
	THURSDAY	1	2	1					
	FRIDAY	4	3	4					
	SATURDAY	2	2	1					
	SUNDAY	2	3	1					
<u>AGC 41</u>	Week 2 comm 17/01/22	Average per hour each day (10pm - 9am)	Average per hour, per day (10pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	2	4	1					
	TUESDAY	1	2	1					
	WEDNESDAY	1	1	1					
	THURSDAY	1	2	1					
	FRIDAY	4	3	4					
	SATURDAY	2	2	2					
	SUNDAY	0	0	1					
					Averages	2	1	0.50	2.08

<u>AGC 42</u>	Week 1 comm 10/01/22	Average per hour each day (10pm - 9am)	Average per hour, per day (10pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	4	7	3					
	TUESDAY	2	4	0					
	WEDNESDAY	3	3	3					
	THURSDAY	3	7	2					
	FRIDAY	3	6	1					
	SATURDAY	2	2	2					
	SUNDAY	1	3	1					
<u>AGC 42</u>	Week 2 comm 17/01/22	Average per hour each day (10pm - 9am)	Average per hour, per day (10pm-1am)	Average per hour, per day (2am-9am)		Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)
	MONDAY	3	6	2					
	TUESDAY	2	5	0					
	WEDNESDAY	2	4	0					
	THURSDAY	1	2	1					
	FRIDAY	3	4	2					
	SATURDAY	3	4	2					
	SUNDAY	4	6	3					
					Averages	4	1	0.67	1.50

AGC 43	Average per hour each day (10pm - 9am)	Average per hour, per day (10pm-1am)	Average per hour, per day (2am-9am)						
	Week 1 comm 10/01/22				Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)	
	MONDAY	2	4	1	Averages	2	1	0.50	2.08
	TUESDAY	1	2	1					
	WEDNESDAY	1	1	1					
	THURSDAY	1	2	1					
	FRIDAY	4	3	4					
	SATURDAY	2	2	1					
SUNDAY	2	3	1						
AGC 43	Average per hour each day (10pm - 9am)	Average per hour, per day (10pm-1am)	Average per hour, per day (2am-9am)						
	Week 2 comm 17/01/22				Average per hour 8pm-1:00am (Mon-Sun)	Average per hour 2:00am - 9:00am (Mon-Sun)	Sun-Thur (2:00am-9:00am)	Fri-Sat (2:00am-9:00am)	
	MONDAY	2	3	2	Averages	3	1	FALSE	0.50
	TUESDAY	2	2	3					
	WEDNESDAY	4	5	3					
	THURSDAY	2	6	0					
	FRIDAY	1	1	1					
	SATURDAY	2	6	0					
SUNDAY	2	6	1						

Appendix 6 Appeal Decisions ref. APP-B0230-W-20-3256275, APP-T5150-W-21-3272089, APP-U5930-W-18-3193121 and APP-V2004-W-19-3233244



Appeal Decision

Site visit made on 27 July 2018

by Grahame Gould BA MPhil MRTPI

an Inspector appointed by the Secretary of State

Decision date: 29th August 2018

Appeal Ref: APP/U5930/W/18/3193121 159 Hoe Street, Walthamstow E17 3AL

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Terry Farr against the decision of the Council of the London Borough of Waltham Forest.
 - The application Ref 171488, dated 18 April 2017, was refused by notice dated 24 November 2017.
 - The development proposed is change of use from estate agents office to amusement centre (adult gaming centre).
-

Decision

1. The appeal is allowed and planning permission is granted for the change of use from estate agents office to amusement centre (adult gaming centre) at 159 Hoe Street, Walthamstow E17 3AL in accordance with the terms of the application, Ref 171488, dated 18 April 2017, subject to the following conditions:
 - 1) The development hereby permitted shall begin not later than 3 years from the date of this decision.
 - 2) The development hereby permitted shall be carried out in accordance with the following approved plans: unnumbered 1:1250 scale Ordnance Survey plan; and RE/W/17/01 – Existing and Proposed Layout.
 - 3) Prior to the first use of any noise amplification equipment for music, sound or speech within the premises a scheme to attenuate the noise emitted by the amplification equipment shall be submitted to and approved in writing by the local planning authority. The scheme for the attenuation of any amplified noise shall include:
 - a) the results of an external background noise survey to be completed prior to the first use of any noise amplification equipment, with the survey to be undertaken in accordance with BS4142:2014 – Methods for rating and assessing Industrial and Commercial Sound;
 - b) the identification of the maximum noise level to be emitted by any amplification equipment; and
 - c) the details of any noise attenuation measures required to ensure that the noise emitted by any amplification equipment will not exceed the background noise level to be agreed in compliance with section a) of this condition.

Prior to the first use of any amplification equipment any measures forming part of a noise attenuation scheme submitted in compliance with this condition shall be implemented in accordance with the approved scheme of details and thereafter the measures shall be retained for the duration of the use of any noise amplification equipment.

- 4) On the commencement of the adult gaming centre use hereby permitted the premises shall be used for no purpose other than an adult gaming centre. For the purposes of this condition the definition for an adult gaming centre shall be that as stated in the Gambling Act 2005 or in any Act revoking and re-enacting that Act with or without modification. The adult gaming centre hereby permitted shall only operate with amusement with prize machines.
- 5) The premises shall only be open to customers between the hours of 08:00 and Midnight on Mondays to Sundays inclusive and inclusive of public holidays.
- 6) A shopfront display shall be provided for the duration of the use hereby permitted in accordance with details to be submitted to and approved in writing by the local planning authority prior to the commencement of the use.

Application for costs

2. An application for costs was made by Terry Farr against the Council of the London Borough of Waltham Forest. That application is the subject of a separate Decision.

Main Issue

3. The main issue is the effect of the use on the vitality and viability of Walthamstow town centre.

Reasons

4. The premises (No 159) comprise the ground floor of a mid- terrace property which is currently vacant. The premises were last occupied by an estate agency (a Class A2 use) and that use ceased in 2014¹. The development would involve a change of use to amusement centre/'adult gaming centre'. The appellant currently operates an adult gaming centre at 2 Central Parade, Hoe Street (No 2), premises that are around 150 metres from No 159². The existing business needs to relocate from No 2 because those premises are to be redeveloped following the exercising of a compulsory purchase order.
5. No 159 is within a section of Hoe Street where there is a high proportion of non-shop/Class A1 uses at street level. The usage of the street level premises in this part of Hoe Street has resulted in it being designated in development plan policy terms as a secondary shopping frontage in Walthamstow town centre.
6. Section B of Policy DM25 of the Waltham Forest Development Management Policies Local Plan of 2013 (the Local Plan) seeks to maintain and encourage Class A1 uses at ground floor level within secondary frontages. Policy DM25 goes on to state that other uses falling with use Classes A2, A3, A4 or A5 will

¹ Paragraph 2.1 of the appellant's appeal statement

² Paragraph 1.3 of the appellant's appeal statement

be considered provided that an undue concentration in the relevant shopping frontage would not arise, ie a level in excess of 50%. Policy DM25 further states that other uses appropriate to a shopping centre, such as crèche, aid centres and medical establishments may be permitted provided the 50% concentration threshold would not be exceeded and it can be shown that the use would contribute to the vitality and viability of the area.

7. Section G of Policy DM25 relates to non-retail service uses and other uses and specifically refers to sui-generis uses and indicates that in considering the suitability or otherwise of such uses, regard will be paid as to whether there would be a concentration of any such uses.
8. The development would result in no loss of a Class A1 premises, given that the most recent use of No 159 was as a Class A2 office. Accordingly I consider that the change of use to an adult gaming centre would not of itself be in conflict with section B of Policy DM25 of the Local Plan. It is contended that the proposed change of use would inadequately contribute to the maintenance and enhancement of this secondary shopping frontage's vitality and viability. However, other than asserting that there would be such an adverse effect no evidence has been put before me demonstrating that would be the case. For instance no evidence has been provided relating to the scale of the demand for Class A1 and A2 premises in the town's secondary areas and whether that demand is exceeding the supply.
9. Despite the Council's assertions I consider the evidence available to me strongly suggests that there is little prospect of the premises being reoccupied by a Class A1 or A2 user in the near future. I say that having regard to the fact that No 159 has been vacant and marketed since 2014. Limited marketing evidence has been submitted, with that evidence taking the form of a one page letter from a local selling/letting agent³. However, I consider it unsurprising that there has been limited interest in these premises, given their secondary location in the town centre.
10. Notwithstanding the limitations of the appellant's marketing evidence I consider that considerable weight can be attached to it because it has come from an agent that could reasonably be expected to have very good knowledge of the market for commercial premises in Hoe Street. That is because the agent has an office a few doors from No 159. So while very limited marketing evidence has been provided in support of the appellant's case I am not persuaded that the Council has presented any of its own evidence to countermand that presented by the appellant.
11. There are no other adult gaming centres within this secondary shopping frontage. Accordingly the relocation of the appellant's business to No 159 would not give rise to an undue concentration of this type of sui generis use, when regard is paid to section G of Policy DM25
12. On the evidence available to me, and for the reasons given above, I conclude that the use would not adversely affect the vitality and viability of Walthamstow town centre. I therefore consider that there would be no conflict with Policy DM25 of the Local Plan because: the use would not result in an increase in the number of non-Class A1 premises in the secondary frontage; the available evidence suggests that there is little prospect of a

³ Strettons' letter of 13 October 2017

Class A1 user seeking to reoccupy the premises; and there would not be an undue concentration of adult gaming centres in the affected part of Hoe Street.

Other Matter

13. Concerns have been raised that the use could have implications for crime and disorder or contribute to gambling addiction. Those are matters that are addressed by 'other legislation' and are therefore not for my consideration in determining this appeal.

Conditions

14. Various conditions have been suggested and I have considered the need for their imposition having regard to the provisions of the national policy and guidance. Apart from the standard implementation condition it is necessary that the development should be implemented in accordance with the submitted plans for certainty and I have imposed a condition to that effect.
15. To ensure that the noise associated with the operation of the premises is not intrusive for the occupiers of nearby dwellings I consider it is necessary that the generation of amplified noise within the premises should be managed through the imposition of a condition. While the suggested condition would require any noise emitted by amplification equipment not to exceed the existing background level, that level has not been identified. For a condition managing amplified noise emissions to be both enforceable and reasonable I consider the existing background noise level would need to be surveyed, in advance of any amplification equipment being used, so that an appropriate noise level could be identified and agreed and any necessary attenuation works could be specified and approved. I have therefore imposed a condition to that effect.
16. To protect the vitality and viability of the town centre and the living conditions of neighbouring residents it is necessary that a condition be imposed restricting the use of the premises to that of an adult gaming centre, as defined by the Gambling Act, and that the centre only operates with amusement with prize machines.
17. To safeguard the living conditions of adjoining residents an opening hours condition has been suggested limiting the opening times to 08:00 to 22:00 hours on Mondays to Saturdays and 10:00 to 20:00 hours on Sundays and public holidays. While No 2 operates without any opening hours' restriction and there appears to be no history of noise complaints associated with the use of those premises, I consider that the siting of No 159 relative to the nearby dwellings is not directly comparable with the situation at No 2. That is because No 2 appears to be situated in a busier section of Hoe Street, being closer to High Street and there is a canopy between No 2 and the residential accommodation above, with that canopy potentially providing some acoustic screening. By contrast No 159 is located in a section of Hoe Street that has a more compact layout and there is no canopy capable of providing any acoustic screening. Within the vicinity of No 159 the street level businesses appear not to trade at noise sensitive times, ie the period after midnight.
18. While the appellant is desirous of the premises being open around the clock, no indication of how significant any income generation might be during the

early morning period has been provided. While the premises are in a town centre that is likely to be characterised by some noise generating activity after 22:00 hours, I consider that in the absence of premises in the vicinity of No 159 opening beyond midnight any comings and goings to the premises after that time could be disturbing for nearby residents. I therefore consider that a condition should be imposed requiring the premises to be closed between midnight and 08:00 hours on Mondays to Sundays, inclusive of public holidays.

19. To assist with the assimilation of the use into the streetscene within Hoe Street I consider it necessary that a shopfront display should be provided. I have therefore imposed a condition requiring the details for such a display to be submitted for the Council's approval.

Conclusion

20. For the reasons given above I conclude that the appeal should be allowed.

Grahame Gould

INSPECTOR



Appeal Decision

Hearing held on 1 October 2019

Site visit made on 1 October 2019

by Darren Hendley BA(Hons) MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 22nd October 2019

Appeal Ref: APP/V2004/W/19/3233244 292 - 294 Holderness Road, Hull HU9 2JX

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by RAL Ltd against the decision of Kingston-Upon-Hull City Council.
 - The application Ref 19/00383/FULL, dated 5 April 2019, was refused by notice dated 12 June 2019.
 - The development proposed is the change of use of 294 Holderness Road from A1 shop to sui generis adult gaming centre in connection with existing adult gaming centre at 292 Holderness Road including external alterations.
-

Decision

1. The appeal is allowed and planning permission is granted for the change of use of 294 Holderness Road from A1 shop to sui generis adult gaming centre in connection with existing adult gaming centre at 292 Holderness Road including external alterations at 292 - 294 Holderness Road, Hull HU9 2JX in accordance with the terms of the application, Ref 19/00383/FULL, dated 5 April 2019, subject to the following conditions:
 - 1) The development hereby permitted shall begin not later than 3 years from the date of this decision.
 - 2) The development hereby permitted shall be carried out in accordance with the following approved plans: Location Plan 1393 (S)01 P1, Site Plan 1393 (S)02 P1, Existing Plan & Elevation 1393 (O)01 P1, Proposed Front Elevation 1393 (O)13 P1, Proposed Front Elevation 1393 (O)14 P1.
 - 3) The development hereby permitted shall not be brought into use until the flood risk resistance and resilience measures as are set out in the submitted Flood Risk Assessment dated 18 January 2019 (Doc ref: HOL-HYD-XX-XX-RP-D-5002) have been implemented. These measures shall be thereafter retained.

Procedural Matters

2. The appellant submitted a further plan, named 'Frontage Measurements & Use Class' which shows an audit of the primary frontage on Holderness Road. As the Council and interested parties have had the opportunity to comment on this plan, there is no possible prejudice. Accordingly, I have considered this plan in my decision. The same applies as regards the various documents that were submitted during the hearing.

3. I was informed at the hearing that the appellant operates under the name of 'Luxury Leisure'. Nevertheless, the appeal proceeds under the name of 'RAL Ltd' as ordinarily only the applicant can make an appeal. This is reflected in the banner heading details above. 'RAL Ltd' is also the company/group name that is set out on the submitted planning appeal form.
4. A second appeal¹ on this site was due to be the subject of the hearing. After the hearing had opened, the appellant withdrew this appeal verbally and this was announced to the hearing. Accordingly, the hearing proceeded only on the basis of the appeal that is set out in the banner heading details and which is the subject of my decision.

Main Issue

5. The main issue is the effect of the proposal on the vitality and viability of the Holderness Road District Centre.

Reasons

6. The appeal property is a vacant shop unit which lies adjacent to an existing adult gaming centre that is also operated by the appellant. The proposal would, in effect, be an extension of this use. The property is located within a terraced row of units which, in total, contain 2 adult gaming centres. A further vacant unit separates these gaming centres. The remainder of the units are occupied by a variety of Class A1 and non-A1 uses².
7. More broadly, both sides of this part of Holderness Road form a long linear arrangement of shops and services. On the same side as the appeal property, there is a stronger propensity of multiple national and regional retailers. The vacancy rate of units is fairly low and this is also reflected in the evidence of the main parties, albeit with minor differences. Holderness Road is a busy thoroughfare and, at the time of my site visit, footfall was relatively high with customers using the facilities that are on offer.
8. For the purposes of the Hull Local Plan 2016 to 2032 (2017) (Local Plan), the site is found within the defined Holderness Road District Centre. It also lies in the primary frontage of that centre. Policy 12 of the Local Plan sets out a number of considerations as regards vitality and viability that are of relevance. It states that within the primary frontage a high proportion of ground floor frontage length is to remain in A1 shopping use. It goes on to state that the change of use from A1 to non-A1 within the primary frontage will be permitted where the proportion of non-A1 ground floor frontage length would not exceed 30%.
9. It is common ground between the main parties that the concentration of A1 uses in the primary frontage is approximately 68%. Simply put, 32% is in non-A1 use. The proposal, as a non-A1 use, would further lead to the proportion of the non-A1 ground floor frontage length exceeding 30%.
10. In these circumstances, Policy 12 states that it is for the development to demonstrate that it would not undermine the viability and vitality of the centre. On similar lines, the Vitality and Viability of Centres Supplementary Planning Document 9 (2019) confirms that the policy thresholds are not to set an

¹ Appeal ref: APP/V2004/W/19/3225545

² under The Town and Country Planning (Use Classes) Order 1987 (as amended).

optimum level beyond which planning applications will simply be refused, but rather set a general threshold as a guide to when the applicant should provide supporting evidence to demonstrate their application would not undermine the vitality and viability of a centre. The same point is made by the Council's Management of Designated Shopping Frontages document, which details the composition and health of the centres across the city and was used to inform the preparation of the Local Plan.

11. The Planning Practice Guidance section: Town centres and retail (PPG) also sets out a number of indicators for assessing the health of town centres. These are also of relevance to vitality and viability. They include diversity of uses, the proportion of vacant street level property and customers' experience and behaviour, amongst other considerations.
12. The Council are concerned that the proposed use, as well as exceeding the 30% figure under Policy 12, would not be complimentary to the shopping function of the centre. In this regard, the supporting evidence on vitality and viability that the appellant has put forward centres on bringing a vacant unit back into use, employment generation, linked trips to other uses in the centre and contributing towards an evening economy, as well as increased natural surveillance during those times.
13. Turning first to bringing a vacant unit back into use, the property has not been occupied since June 2017. The marketing for the premises started before then, in November 2016. It has included an advertising board on the property, which was still in place at the time of my site visit, the preparation and distribution of a marketing brochure and listings on various property websites. An agent was appointed to carry out the marketing.
14. Despite what I consider has been a thorough marketing exercise, it is evident that the only realistic interest that has been expressed in the unit is from the appellant. Whilst the Council queried whether it has been offered at a reasonable value, there is no substantive evidence to assert this concern. As a consequence, if the proposal was not to go ahead, there seems little realistic possibility of the unit been occupied by an A1 use. For the unit to continue to remain vacant, and considering it has already been so for over 2 years, would mean it would continue to depreciate from the viability and vitality of the centre, even though the overall vacancy rate is fairly low. This attracts significant weight in my decision.
15. The site's location close to the other shops and services would result in the potential for linked trips and associated footfall. There would be minor benefits with the envisaged employment levels, to the evening economy with the proposed opening hours and with regard to providing natural surveillance, along with the existing gaming centres and other evening uses.
16. The proliferation of adult gaming centre uses, in particular in this terrace of units, would not be to the extent that the proposal would cause undue concern. It would still maintain the mix of uses that would be expected in such a centre and it would have the benefit of having one less vacant unit. Although the shop front display areas would differ from an A1 use, this would not diminish from the appeal of this row of shops, the primary frontage, or the centre as a whole because the overall form and appearance of the units would be maintained.

17. When these factors are taken together, in particular that the vacant unit would be brought back into use, the proposal would be complimentary to the shopping environment as it would not undermine the vitality and viability of the centre. Likewise, when the indicators in the PPG are considered, the proposal would not detract from the health of the centre. It would maintain the diversity of uses and it would lower the proportions of vacancies. Nor would it diminish from customers' experience and behaviour of the centre, as it would be a complimentary use that would not be unexpected in such a location and allow for the potential for linked trips.
18. The planning history of 290 Holderness Road concerning a proposed adult gaming centre that I have been referred to attracts limited weight in my decision. When this was approved, it was under a development plan that is no longer in force and whilst it has then been recently refused under the current Local Plan, I have based my decision on the planning merits of the case before me, including the totality of the evidence. The same applies as regards the appeal decisions in other parts of the country for adult gaming centres that have been drawn to my attention, as the development plans and the particular site circumstances differ. The appellant's customer inflow surveys also have a limited bearing as they relate to different locations, notwithstanding that the proposal would allow for linked trips for the reasons that I have set out.
19. I conclude that the proposal would not have an unacceptable effect on the vitality and viability of the Holderness Road District Centre. As such, it would comply with Policy 12 because whilst the stated 30% proportion of non-A1 uses in the primary frontage would be exceeded, the development has demonstrated that it would not undermine the vitality and viability of the centre.

Other Matters

20. The appellant described a number of measures during the hearing which concerned security and social responsibility. Although I am aware of the concerns that can be expressed because of the nature of the use, these largely lie outside of what I can consider. This is also irrespective of whether the proposal would be implemented by the appellant, or by another similar organisation. Noise and disturbance, crime prevention and anti-social behaviour are not in dispute and, accordingly, I have not considered these matters further.

Conditions

21. As well as the time limit condition (1), I have imposed a condition in the interests of certainty concerning the approved plans (2). I have also imposed a condition to minimise the risk of flooding (3). This involves the resistance and resilience measures that are set out in the Flood Risk Assessment that was submitted with the planning application and includes the floor levels, amongst other measures.
22. In relation to the external appearance of the proposal, this is already adequately addressed through requiring the proposal to be carried out in accordance with the approved plans. At the hearing, the Council requested a condition concerning the proposed internal layout. However, as no such plan forms part of the appeal submission and the gaming machines, in any event, would be moveable, such a condition would not be reasonable and necessary.

In relation to the proposed opening hours, the application submission indicates it would be in 24 hour operation on all days of the week. This is not unacceptable with its District Centre location. Thus, a restriction of the opening hours would also not be reasonable and necessary.

Conclusion

23. For the reasons set out above, and having regard to all matters raised, the appeal should be allowed subject to the conditions.

Darren Hendley

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Kevin Farnsworth	Luxury Leisure
Sean Heaney	Luxury Leisure
Elizabeth Speed	Luxury Leisure
Justin Gartland	Lichfields
Adam Jackson	Lichfields

FOR THE LOCAL PLANNING AUTHORITY:

John Wright	Hull City Council
Ben Foster	Hull City Council
Roger Gray	Hull City Council

INTERESTED PARTIES:

Councillor Chambers	Hull City Council
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DOCUMENTS SUBMITTED AT THE HEARING

- 1 RE6 and RE8 Customer Inflow Surveys
- 2 Hull City Council, Hull Local Plan: 2016 to 2032 Vitality and viability of centres Supplementary Planning Document 9 (2019)
- 3 Hull Local Plan 2016 to 2032 Policies Map (2017)
- 4 Hull Local Plan – Publication Consultation Document 2016 to 2032 The Management of Designated Shopping Frontages



Appeal Decision

Site visit made on 24 November 2020

by Bhupinder Thandi BA (Hons) MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 29 December 2020

Appeal Ref: APP/B0230/W/20/3256275

Ground floor, 10-12 Chapel Street, Luton LU1 2SE

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by East Kent Leasing Ltd against the decision of Luton Council.
 - The application Ref 20/00398/COU, dated 26 March 2020, was refused by notice dated 19 May 2020.
 - The development proposed is change of use from betting office (sui generis) to amusement centre (adult gaming centre) (sui generis).
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Decision

1. The appeal is allowed and planning permission is granted for the change of use from betting office (sui generis) to amusement centre (adult gaming centre) (sui generis) at Ground floor, 10-12 Chapel Street, Luton LU1 2SE in accordance with the terms of the application, Ref 20/00398/COU dated 26 March 2020 subject to the conditions set out in the Schedule to this decision.

Application for costs

2. An application for costs was made by East Kent Leasing Ltd against Luton Council. This application is the subject of a separate decision.

Main Issue

3. The main issue is the effect of the proposed development upon the vitality and viability of Luton town centre.

Reasons

4. The appeal site comprises a property located within Luton town centre that is vacant at ground floor. The premises was last occupied as a betting shop. Chapel Street has a mix of uses along it, albeit dominated by hot food uses including late night businesses.
5. Luton is a typical town centre with a main indoor shopping centre, pedestrianised high street and off shoot streets containing a mix of retail and other uses. During my visit I observed a small number of betting shops and an amusement centre along the pedestrianised section of the town centre and no obvious proliferation of such uses.
6. Amusement centres and betting shops, for that matter, are an established part of high streets and shopping centres across the country and complement their retail function. There are no other amusement centres along Chapel Street. The

betting shops and amusement centre are located on George Street. Due to the low total number of such uses and the presence of intervening uses, gambling facilities do not dominate the centre as a whole. Nor would the proposed use result in a cluster or concentration of such uses in the area. I am also mindful that the previous use of the premises was a betting shop therefore there would be no overall increase in the total number of such uses.

7. The appellant has provided information undertaken at various premises around the country which indicates that some customers link visits to amusement centres with shopping trips or work. Whilst this survey is limited in scope, it has not been challenged by the Council and notwithstanding their comments there is no substantive evidence to indicate that customers to the premises would not visit other shops and facilities in the town centre thereby contributing towards its vitality and viability.
8. The use of the amusement centre would be restricted to people over a certain age. However, there is no substantive evidence that this would have a harmful material effect on visitors to the town centre or social cohesion, particularly when considering the previous use.
9. The Council contend that the proposed development would necessitate a requirement for security personnel, although there is no evidence before me to support this. In any event the presence of security personnel at the entrance to pubs, bars, shopping centres and high street retailers is a common feature of many town centres. In my judgement this would not give rise to an impression of a nuisance or unsafe use. Moreover, I am not aware of any objection from the local police force.
10. The Council contend that the town centre is at a critical stage of its regeneration. However, there is no substantive evidence before me to support this. Nor did I observe obvious signs of regeneration activity on the ground during my site visit. I therefore afford this limited weight in coming to my decision.
11. I note that no evidence has been provided demonstrating why alternative uses could not occupy the premises. However, I find that with specific regard to this appeal there is no planning policy requirement to do so. I have therefore given this matter negligible weight in coming to my decision.
12. As such, the proposed development would not undermine the vitality and viability of Luton town centre. As such it would accord with Policies LLP1, LLP3 and LLP25 of the Luton Local Plan (2016) which, amongst other things, require all new development to preserve or improve the character of the area; town centre proposals to contribute towards job creation, contribute to the achievement of a mixed area which is vibrant and active and enhance the distinctiveness and character of the area by responding positively to townscape.
13. It would also accord with the National Planning Policy Framework at paragraphs 85 and 127, which amongst other things, seek to promote the growth and diversification of town centres to allow them to grow and diversify in a way that can respond to rapid change in the retail and leisure industries and allows a suitable mix of uses, and create places where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Conditions

14. In addition to the standard time limit condition, I have imposed a condition specifying the relevant drawings as this provides certainty.
15. The appellant has submitted a sound insulation assessment with regard to comments made by the Council's Environmental Health Officer in relation to noise transmission through the building. Whilst the Council have not commented on its contents, I am satisfied that the details are satisfactory and thus it is not necessary to impose the condition.
16. The Council has suggested a condition preventing external alterations to the appearance of the building. However, such alterations would require separate permission and do not form part of the scheme before me. Therefore, it is not necessary to impose such a condition.
17. The Council have suggested a condition limiting the opening hours of the premises to 0900 to 2300 Mondays to Saturdays and 1000 to 2200 Sundays and Bank Holidays. However, the nature of the use is unlikely to result in undue noise and disturbance from comings and goings and given its town centre location and the presence of late night and 24 hour uses in the area I do not consider it necessary to limit the opening hours.

Conclusion

18. For the reasons set out above the appeal succeeds.

B Thandi

INSPECTOR

Schedule of Conditions

- 1) The development hereby permitted shall begin not later than 3 years from the date of this decision.
- 2) The development hereby permitted shall be carried out in accordance with the following approved plans: Location/Block Plan and Existing and Proposed Ground Floor Plan Drawing Number 20003/001/B.



Appeal Decision

Hearing (Virtual) held on 15 February 2022

Site visits made on 15 February 2022

by J Bowyer BSc(Hons) MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 04 March 2022

Appeal Ref: APP/T5150/W/21/3272089 251-253 Neasden Lane, London NW10 1QG

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Luxury Leisure against the decision of the Council of the London Borough of Brent.
 - The application Ref 20/2546, dated 14 August 2020, was refused by notice dated 23 October 2020.
 - The development proposed is change of use of the ground floor from licensed betting shop (sui generis) to adult gaming centre (sui generis) with shopfront alterations and associated plant.
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Decision

1. The appeal is allowed and planning permission is granted for change of use of the ground floor from licensed betting shop (sui generis) to adult gaming centre (sui generis) with shopfront alterations and associated plant at 251-253 Neasden Lane, London NW10 1QG in accordance with the terms of the application Ref 20/2546 dated 14 August 2020 subject to the conditions in the attached schedule.

Preliminary Matters

2. Insofar as it is relevant to the appeal proposal, the development plan in place when the Council determined the application comprised the London Plan 2016, the Core Strategy 2010 (CS) and the Development Management Policies 2016 (DMP). Before the appeal was submitted, the London Plan 2021 (LP) was published and superseded the previous iteration. After the closure of the hearing, the Brent Local Plan 2019-2041 (BLP) was adopted by the Council on 24 February 2022, superseding relevant policies of the CS and DMP and making changes to the Policies Map, including in relation to the designated boundary and frontages of the Neasden Town Centre.
3. The main parties were able to comment on any implications for the appeal of these changes as well as the weight to be given to the BLP depending on its status at the time of my decision in their written submissions and at the hearing. I have taken the comments made into account, and I am satisfied that no prejudice would be caused by my determination of the appeal giving full weight to the LP and BLP.
4. The agreed Statement of Common Ground (SoCG) sets out that crime and antisocial behaviour is no longer a matter of dispute between the parties, and confirms that reference to crime and antisocial behaviour should be removed

from the first reason for refusal. Following clarification by the appellant that the proposed shopfront alterations include painting of the aluminium frame and mullions but not of the glazing, the Council is also satisfied that its second reason for refusal concerning the effect of the proposal on the character and appearance of the street scene and the Neasden Town Centre could fall away. I have considered the appeal and framed the main issues accordingly.

Main Issues

5. Having regard to the above, the main issues are:
- i) the effect of the proposal on the vitality and viability of the Neasden Town Centre; and
 - ii) the effect of the proposal on the living conditions of nearby occupiers with particular regard to noise and disturbance.

Reasons

Vitality and Viability of Neasden Town Centre

6. The appeal site is located within a Secondary Frontage of the Neasden Town Centre as defined by the BLP. It includes a ground floor unit which was last in use as a licensed betting office, but which the SoCG notes has been vacant since October 2019. The appellant proposes an Adult Gaming Centre (AGC) on the site.
7. Policy BE5 of the BLP outlines that AGCs will be permitted where they would result, amongst other things, in no more than 3% of the town centre frontage consisting of AGCs or pawnbrokers/payday loan shops. There are no pawnbrokers/payday loan shops in Neasden Town Centre, but the appellant accepts that the proposal together with existing AGCs at 304 and 322 Neasden Lane would result in around 3.38% of the designated Town Centre frontage comprising AGC use. It would not therefore be supported by Policy BE5.
8. However, the appellant's evidence indicates that the appeal property was marketed between September 2019 and December 2021 through a marketing board on the property, circulation to mailing lists, and listing on company and retail database websites. Other than the appellant, the agent instructed to carry out the marketing advises that there were very few enquiries and no interested parties of note or offers received, and that no inspections have taken place since 2019. The Council's appeal statement records that it had been unable to find listings for the property on any of the named websites, but it was confirmed at the hearing that searches were carried out after the marketing agent's instruction had ended. It is therefore unsurprising that details were no longer online, and I have no firm reason to doubt that the unit was actively marketed for a considerable period in accordance with the details outlined by the appellant, albeit that this has now ceased.
9. The marketing agent has commented that they consider the price that the property was marketed at to be overrented, but that it was made clear during the marketing that incentives were available and the advertised rent would not in their opinion have dissuaded interested parties. The submitted marketing particulars do not refer specifically to the availability of incentives, and the Council has drawn my attention to provisions within the BLP specifying that marketing should be undertaken at an appropriate rent/a price that genuinely reflects market value. However, these provisions relate to policies that are not

directly relevant to the proposal before me, and while they offer some guidance on approach, I do not therefore consider it would be reasonable to apply these as requirements that the appeal development must comply with.

10. The appellant suggests that it is standard for incentives not to be disclosed in marketing details, and that most businesses looking for a property would be cognisant of potential for negotiation. The marketing was carried out by an experienced agent, and while I acknowledge the Council's concern that the valuation could have deterred some potentially interested parties from pursuing the property further, I consider it unlikely that this would be so widespread as to lead alone to the lack of interest in the property.
11. In this regard, I further note the location of the appeal site towards the outskirts of this part of the Town Centre and within a frontage that was reclassified from Primary to Secondary Frontage on adoption of the BLP. The marketing agent comments that the primary factor in the lack of demand for the property is its location, advising that demand for edge of prime and secondary units has fallen, and suggesting that this trend will continue and accelerate. I have no substantive evidence to the contrary, and irrespective of the rent level within the marketing particulars for the site, I consider having regard to the evidence before me that there is little realistic prospect of the unit coming forward for alternative use.
12. In addition, I observed a number of other vacant units in the Town Centre. While overall vacancy levels may not be high, there is no clear evidence before me of unmet demand for space from independent traders or other occupiers, nor to demonstrate that the proposal would adversely affect the ability of the Town Centre to cater for local needs or to accommodate cultural activity. The Council advised that Neasden had been identified as performing more poorly than other town centres in London. However, it confirmed that the designated boundary was subsequently altered as part of the BLP to provide greater focus to the Town Centre and support the offer that can be maintained. The Town Centre was also relatively busy when I visited, even in poor weather conditions, and I have not been provided with any firm evidence demonstrating that the proposal would cause actual detriment to its health.
13. To the contrary, the site has been unoccupied for over 27 months now, and as a fairly large, vacant unit offers no meaningful contribution to the vitality or viability of the Town Centre. The proposal would bring the unit back into active use. The Council points to data from 'A Fair Deal: Betting Shops, Adult Gaming Centres and Pawnbrokers in Brent 2013' indicating that footfall associated with AGCs is much lower than other town centre uses. Be that as it may, there would undoubtedly be an increase in footfall relative to a vacant unit which I have found has little realistic prospect of alternative use, and even town centre users who did not visit the premises would benefit from an active and occupied unit rather than an empty frontage.
14. Furthermore, the appellant has provided the results of surveys suggesting that a proportion of customers to AGCs will also visit surrounding businesses. The sample size is relatively limited, and I do not have full details of the survey methodology, nor of the AGCs and town centres considered. As a consequence, I am unable to draw direct comparison with the circumstances of the appeal site or reach any firm conclusions on the likely level of linked trips that would stem from the appeal proposal. Even so, I do not doubt that at least some

customers would also use other nearby shops or services, supporting these businesses and contributing to the vitality and viability of the Town Centre as a whole. The development would also employ staff, and while employee levels may be no higher than for alternative town centre uses, there would be an increase over a vacant unit.

15. Moreover, the BLP explains that Policy BE5 seeks to prevent uses including AGCs locating in close proximity to units in the same use to ensure that there is not an over-concentration of particular uses within any single length of frontage. The other AGCs in the Town Centre are located to the opposite side of Neasden Lane, and given the separation and overall mix of other uses that are present between the units, I am satisfied that AGCs would be reasonably well spread-out. I do not therefore find that there would be an impression of a predominance or particular cluster of AGCs within the Town Centre.
16. Insofar as it would result in more than 3% of the Neasden Town Centre frontage consisting of AGCs or pawnbrokers/payday loan shops, the proposal would not be supported by BLP Policy BE5. Nevertheless, the exceedance would be relatively slight, and I find taking the above factors in combination that the development would not cause actual detriment to the overall health or diversity of uses within the Town Centre or its ability to meet local needs, and would not result in an unacceptable over-concentration of AGCs. In my judgement, the proposal would make a small but nevertheless positive contribution to the vitality and viability of the Town Centre, and I conclude that the benefits of the proposal would in this case be sufficient to outweigh the failure to accord with one limb of BLP Policy BE5.
17. The proposal would also comply with Policy DMP1 of the BLP which advises that development will be acceptable provided it is, amongst other things, of a location, use and siting that complements the locality. It would further accord with the National Planning Policy Framework (the Framework) insofar as it endorses a positive approach to the growth, management and adaptation of town centres.

Living Conditions

18. The appeal proposes that the AGC would be open 24 hours a day. There are residential occupiers nearby, including to the upper floors of the appeal building and adjacent premises. However, the site is located within a Town Centre with a fairly diverse mix of uses nearby, including a number that I saw were open late into the evening.
19. I note that examples of premises near to the site highlighted by the appellant do not operate 24 hours a day. Even so, there is a bus stop close to the appeal site which I saw is served by a large number of routes. These include services which operate through the night, and which would therefore be likely to result in some associated noise and activity close by. Furthermore, no restriction was placed on the opening hours of 322 Neasden Lane when permission was granted for its use as an AGC, and signage advertises that it is open 24 hours a day. I saw that the AGC at 304 Neasden Lane and a supermarket at 295-299 Neasden Lane also advertise 24 hour opening. The Council was unable to find any record of a restriction that was imposed on the opening hours of No 304 when planning permission was originally granted having been formally varied. Even without this unit though, Neasden Lane appears to be a fairly busy road, and it seems to me having regard to the above that a degree of activity is

likely to continue in the Town Centre through the night and early morning, and that some background noise and activity would be reasonably expected by residential occupiers near to the site.

20. Moreover, the appellant has provided a Noise Assessment which concludes that noise likely to result from the numbers of customers expected to arrive at or leave the site would not be distinguishable against measured night-time noise levels at the nearest residential window. The expected customer numbers are based on survey data of similarly sized premises in London and the appellant's experience showing that most customers arrive at and leave AGCs alone or in pairs, and are broadly consistent with my observations of visitors to the existing AGCs in Neasden. I appreciate that my visits represent a snapshot and reflect the offer of the existing AGCs, and that it would not be possible to control actual numbers of customers. However, I have no firm reason to find that the assumed numbers of customers would be likely to differ significantly from premises of similar size elsewhere in London, and the Council's evidence in relation to the first main issue also indicates that footfall to AGCs is typically fairly low. I further note that the measured night-time noise levels have not been adjusted to account for the survey having been carried out during the COVID-19 pandemic when the night-time economy remained subject to restrictions, and the assessed baseline is therefore likely to be somewhat below post-pandemic levels.
21. The Council and interested parties refer to crime and antisocial behaviour in the Town Centre, and the police have provided lists of incidents that have been recorded including in relation to the existing AGCs. However, it is not clear whether these occurred inside the relevant premises, whether there was associated noise or disturbance of any significance. Nor do I know the time at which these incidents took place and therefore whether they were during periods that occupiers would be more sensitive to noise. In any event, there is no compelling evidence demonstrating that the specific proposal that is before me would attract or harmfully exacerbate crime or antisocial behaviour so as to result in noise or disturbance that would undermine the appellant's assessment.
22. In my view, the Noise Assessment offers a suitable basis on which to consider the proposal, and I note that the Council's Environmental Health consultee raised no objection to the proposal on grounds of noise. Having regard to the evidence before me, I do not consider that there would be uncharacteristic or intrusive noise or disturbance associated with comings and goings to the appeal site so as to stand out or detract from the quality of life of surrounding residents. Subject to appropriately worded planning conditions, I also agree with the main parties that activity taking place within the premises and proposed plant equipment would not result in unacceptable noise or disturbance to nearby residential occupiers.
23. In contrast to the appeal before me, the Council confirmed at the hearing that proposals for AGCs at 141 Kilburn High Road and at 5-6 Park Parade, Harlesden which were the subject of recent appeal decisions were not advanced with specific noise assessments. I have not therefore attached significant weight to the conclusions within these appeal decisions that there would be harm to the living conditions of neighbouring occupiers through noise and disturbance, and I have instead reached my own conclusions on the appeal proposal on the basis of the evidence before me.

24. For these reasons, I conclude that the proposal would not cause unacceptable harm to the living conditions of nearby occupiers by reason of noise or disturbance. Accordingly, I find no conflict with Policy DMP 1 of the BLP which outlines that development will be acceptable subject to criteria including that it does not unacceptably increase exposure to noise and general disturbance.

Other Matters

25. Notwithstanding the Council's position, I acknowledge representations by interested parties regarding potential crime and antisocial behaviour, and that these are already matters of local concern. However, as set out under the second main issue above, there is no substantive evidence demonstrating that the specific proposal that is before me would attract or increase crime or antisocial behaviour.
26. AGCs are a legitimate form of use, and risks of problem gambling or to young or vulnerable people would be addressed by management functions and regulatory control including through the licensing regime. Given these factors and that the current use of the site would already permit forms of gambling, the nature of the AGC use involving gambling would not be a reasonable justification to withhold planning permission.
27. While I have taken into account representations by interested parties, I am satisfied that none of the other matters raised, either individually or collectively, would result in a level of harm that would justify dismissal of the appeal, and they do not alter my findings on the main issues.

Conditions

28. As well as the standard time limit condition, I have imposed a condition specifying the approved plans for the avoidance of doubt and in the interest of certainty. A condition to control the treatment of the shopfront is necessary to maintain an active frontage in the interests of the character and appearance of the area and the vitality of the Town Centre. However, I do not consider that a restriction on the display of promotional material would be reasonable or necessary given that this would be subject to control under other regulatory regimes, and I have amended the Council's suggested condition accordingly.
29. There is some uncertainty over the internal construction of the appeal building and the details of the plant equipment to be installed at the site. Conditions to require full details of plant equipment and further noise assessment and implementation of measures necessary to mitigate the effects of noise are therefore necessary in the interests of the living conditions of neighbouring occupiers and the character and appearance of the area. I have also imposed a condition requiring provision for staff cycle storage in the interests of supporting travel by sustainable modes and to meet the requirements of the development plan.
30. Given my conclusion on the second main issue, a condition suggested by the Council to restrict operational hours would not be reasonable or necessary, and I have not imposed it.

Conclusion

31. I have found that the development would not harm the living conditions of nearby occupiers, and there would be no conflict with BLP Policy DMP1. While

the proposal would not accord with one of the limbs of BLP Policy BE5, it would not harm the viability or vitality of the Neasden Town Centre and would result in benefits that I consider would in this case outweigh this failure. I find that material considerations therefore indicate that the appeal should be determined otherwise than in accordance with the development plan, and that planning permission should be granted.

32. Accordingly, I conclude that the appeal should be allowed.

J Bowyer

INSPECTOR

Schedule of Conditions

- 1) The development hereby permitted shall begin not later than 3 years from the date of this decision.
- 2) Unless otherwise amended under the conditions below, the development hereby permitted shall be carried out in accordance with the following approved drawing: 3386(B)01.
- 3) A clear and unobstructed window display shall be maintained at all times with no signage and/or visual obstructions to views into the premises above a height of 1.2 metres from external ground level and with non-tinted/non-obscured glass to the entrance door or any front windows.
- 4) No external plant or noise generating equipment shall be installed other than in accordance with a scheme, including details of the plant/equipment and existing and proposed elevations, which has first been submitted to and approved in writing by the Local Planning Authority.
- 5) The site shall not be first occupied for the use hereby permitted until a noise assessment and scheme of mitigation to protect neighbouring residential occupiers from noise from within the appeal premises and from external plant or noise generating equipment has been submitted to and approved in writing by the Local Planning Authority. All works which form part of the approved scheme of mitigation to protect neighbouring residential occupiers from noise from within the appeal premises shall be implemented in full before the site is first occupied for the use permitted and shall be retained thereafter. All works which form part of the approved scheme of mitigation to protect neighbouring residential occupiers from noise from external plant or noise generating equipment shall be implemented in full before the equipment is first brought into use and shall be retained thereafter.
- 6) The site shall not be first occupied for the use hereby permitted until space has been laid out within the site for staff bicycles to be parked in accordance with details which have first been submitted to and approved in writing by the Local Planning Authority, and the space shall thereafter be kept available for the parking of bicycles.

APPEARANCES

FOR THE APPELLANT:

Dennis Pope	Lichfields
Thomas Bailess	Hepworth Acoustics
Ian Miller	Luxury Leisure
Shaun Hooper	Luxury Leisure
Mark Thompson	Luxury Leisure

FOR THE LOCAL PLANNING AUTHORITY:

Sarah Dilley	Development Management, London Borough of Brent
Paul Lewin	Planning Policy, London Borough of Brent

DOCUMENTS SUBMITTED AT THE HEARING

1. Extracts of the Development Management Policies 2016 and Brent Local Plan 2022 containing supporting text referring to marketing.
2. Extract of Appeal Decision APP/T5150/A/02/1103105.
3. Appeal Decision APP/T5150/W/16/3163392 dated 23 February 2017.

Appendix 7 Noise Assessment by Hepworth Acoustics

PROPOSED ADMIRAL PREMISES AT 513 GREEN LANES, HARINGEY, LONDON

NOISE ASSESSMENT

On behalf of:
Luxury Leisure

PROPOSED ADMIRAL PREMISES AT 513 GREEN LANES, HARINGEY, LONDON

NOISE ASSESSMENT

Report prepared by:
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On behalf of:
Luxury Leisure

Report prepared by:
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1.0 INTRODUCTION

- 1.1 Hepworth Acoustics Ltd has been commissioned by Luxury Leisure to carry out a noise assessment in connection with a proposed Admiral development in the ground floor unit at 513 Green Lanes, Haringey, London N4 1AN.
- 1.2 This assessment has been requested in connection with the planning application for the development. Currently the ground floor unit is vacant. The applicant proposes to convert this to an adult gaming centre, which will include slot machines and other electronic gaming machines. We understand that the applicant proposes opening to customers for 24 hours a day, 7 days a week.
- 1.3 This assessment has included the following:
- A site inspection;
 - A survey of the prevailing environmental noise levels at the site;
 - Assessment of noise from the proposed external condensers;
 - Measurement of indoor activity noise at a similar Admiral venue to use as reference noise levels;
 - Recommendations of appropriate noise control measures.
- 1.4 The site is bounded by Green Lanes (A105) to the east. To the west of the site are private residences. Either side of the site are retail premises with residential apartments above. There is a residential apartment on the first floor of the building, directly above the ground floor trading premises. The site location is shown in Figure 1.
- 1.5 The gaming area of the proposed development will be at the front of the building, adjacent to Green Lanes. The rear of the premises will be used for WCs, storage, and staff facilities. The nearest residential habitable-room window to the rear is 8 metres away, based on our survey on site. Between the rear of the premises and the nearest residence is a 1.2 metres high brick wall with a 1.3 metres high solid timber screen on top.
- 1.6 Two new condensers are proposed to serve the climate control system for the premises, to replace the existing (disconnected) condensers that previously served the unit when it was occupied by Betfred. These are located at the rear of the property.

- 1.7 All recommendations are given for acoustics reasons only. Compliance with other requirements (e.g. fire, structural, thermal, etc.) must be checked by others.
- 1.8 The various noise units and indices referred to in this report are described in Appendix I. All noise levels mentioned in the text have been rounded to the nearest decibel, as fractions of decibels are imperceptible.

2.0 ACOUSTIC DESIGN CRITERIA

- 2.1 The *National Planning Policy Framework* (NPPF) 2019 provides some general guidance to local authorities on taking noise into account in planning policies and decisions. NPPF paragraph 180, a) states that planning policies and decisions should “mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life”.
- 2.2 Policy 7.15 of the adopted London Plan (2016) states that development proposals should seek to manage noise by “mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses”. Supporting paragraph 7.52 states that managing noise “can also mean preventing unacceptable adverse effects from occurring. Managing noise includes improving and enhancing the acoustic environment and promoting appropriate soundscapes. This can mean allowing some places or certain times to become noisier within reason, whilst others become quieter”.
- 2.3 For the internal noise limits for the first-floor residences, we have referred to the guidance in British Standard 8233: 2014 *Guidance on sound insulation and noise reduction for buildings*.
- 2.4 British Standard 8233: 2014 *Guidance on sound insulation and noise reduction for buildings*, which carries the full weight of an adopted British Standard, recommends guidance on design criteria for acceptable noise levels within residential accommodation. BS 8233 guidelines for the daytime (07:00 – 23:00) and night-time (23:00 – 07:00) periods are summarised in Table 1.

Table 1: BS 8233 recommended acoustic design criteria

Activity	Location	Internal Noise Levels	
		Daytime 07:00 – 23:00	Night-time 23:00 – 07:00
Resting	Living room	35 dB LAeq,16hr	-
Dining	Dining room / area	40 dB LAeq,16hr	-
Sleeping (daytime resting)	Bedroom	35 dB LAeq,16hr	30 dB LAeq,8hr

- 2.5 BS 8233 clarifies that the above guidance relates only to noise without ‘specific character’ (e.g. such as that which has a distinguishable, discrete and continuous tone, is irregular enough to attract attention, or has strong low-frequency content) and that where such characteristics are present, lower noise limits might be appropriate.

- 2.6 The type of noise associated with the proposed gaming machines has 'specific character'. To account for this, we recommend that noise intrusion from the ground floor trading area to the residence above should be controlled to be within NR 15. This is equivalent to no more than around 23 dB L_{Aeq} and is therefore well within the BS 8233 limits stated in Table 1.
- 2.7 BS 8233 also recognises that regular individual noise events at night can cause sleep disturbance. Peaks of noise from individual events are usually described in terms of L_{Amax} values and these can be highly variable and unpredictable. Research described in WHO *Community Noise Guidelines* states, "*for a good sleep, it is believed that indoor sound pressure levels should not exceed approximately 45 dB L_{Amax} more than 10-15 times per night*".
- 2.8 In respect of peaks of noise we have therefore adopted a design target of typical peaks of noise to be controlled to no more than NR 30 in terms of L_{max} which is equivalent to no more than around 38 dB L_{Amax} .
- 2.9 For external plant, we understand that the Local Authority, Haringey Borough Council, has no specific noise limits but recommends following the guidance *British Standard 4142:2014 'Methods for rating and assessing industrial and commercial sound'*. The current version of British Standard 4142 is BS 4142: 2014 + A1: 2019 '*Methods for rating and assessing industrial and commercial sound*'. This standard provides methods for rating and assessing sound of an industrial and/or commercial nature. The standard will be referred to as BS 4142 for the rest of this report for brevity.
- 2.10 BS 4142 requires the 'rating' noise level for the operation to be compared with the background (L_{A90}) noise level in the absence of the operational noise being assessed.
- 2.11 The 'rating' level is derived based on the 'specific' L_{Aeq} noise level attributable to the operation with an '*acoustic feature*' penalty added for any noise sources which give rise to tonal, impulsive, intermittent, or other characteristics readily distinctive against the residual acoustic environment.
- 2.12 An initial estimate of the impact of the operation is determined by subtracting the background level from the rating level. BS 4142 states that:
- Typically, the greater this difference, the greater the magnitude of the impact
 - A difference of around +10 dB or more is likely to be an indication of a significant adverse impact, depending on the context
 - A difference of around +5 dB is likely to be an indication of an adverse impact, depending on the context

- The lower the rating level is relative to the measured background level, the less likely it is that the operation will have an adverse impact or a significant adverse impact. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context.

2.13 Where the initial estimate of the impact needs to be modified due to the context, all pertinent factors should be taken into account, including:

- The absolute level of sound;
- The character and level of the residual sound;
- The sensitivity of the receptor and whether dwellings ... will already incorporate design measures that secure good internal and/or outdoor acoustic conditions, such as: i) façade insulation treatment, ii) ventilation and/or cooling, and iii) acoustic screening.

3.0 NOISE SURVEYS

Covid-19

3.1 Due to the government restrictions in response to the Covid-19 pandemic, environmental noise levels at the site were abnormally low at the time of the survey. With travel restrictions and many commercial premises closed, noise-generating activity in Haringey is reduced. The usual night-time economy in the area, including the many bars and restaurants along Green Lanes, were either shut down at the time of the survey, or operating at a reduced capacity, meaning the number of people in the area at night-time is atypically low. The result is that daytime and night-time noise levels are lower than can be expected once government restrictions are relaxed.

3.2 To adapt to this unusual situation and allow noise assessments to proceed in a realistic and practical way, the Association of Noise Consultants [ANC] and the Institute of Acoustics [IOA] published the *Joint Guidance on the Impact of COVID-19 on the Practicality and Reliability of Baseline Sound Level Surveying and the Provision of Sound & Noise Impact Assessments*, Version 2, dated 24th March 2020. This includes the following advice:

“The COVID-19 outbreak presented new challenges in obtaining representative baseline sound levels because typical road, air and rail transport usage have been reduced by travel restrictions and social distancing measures. Other sound sources may also have been affected – for example, due to changes in operating patterns at industrial and commercial premises. However, now that site visits cannot routinely occur, other approaches may have to be taken to establish an appropriate robust estimate of baseline conditions, such as using existing data (for example, from previous local surveys and noise maps) or undertaking baseline sound predictions. These approaches can be supplemented by additional limited on-site sound level measurements, where permitted. The most appropriate option to use must be determined on a case-by-case basis, assessing the level of uncertainty and including this information in the reporting. Most importantly at this time, before progressing with any methodology, there should be discussion of the intended approach with the relevant regulating authority.”

3.3 We have reviewed historical noise assessments carried out by others for developments in the vicinity of 513 Green Lanes. Unfortunately, there is nothing suitable for our needs.

3.4 Defra supplies predicted road traffic noise data, available at www.extrium.co.uk/noiseviewer.html. The Defra noise maps for daytime and night-time noise for the area are shown in Figures 2 and 3. Note that these noise maps are predictions based on road traffic data only, and therefore do not consider

noise from other sources such as fixed mechanical plant, pedestrians, aircraft, or entertainment noise. Therefore, they would be an underestimate for a location such as Green Lanes where, under normal conditions, noise from these other sources would be present. The Defra data is still of use, despite this, as we can conclude that the levels shown on their maps are an underestimate. This means we can be confident that our predicted post-Covid environmental noise levels should be above the levels indicated by Defra.

- 3.5 Taking all of the above guidance into consideration, our strategy has been to visit the site to familiarise ourselves with the surrounding area and the locations of the adjacent noise-sensitive receptors. We have carried out on-site sound level measurements to assess the existing noise levels. These have been adjusted using data from the Defra noise maps, to make a reasonable prediction of future environmental noise levels. If necessary, this can be verified with an additional noise survey once more commercial activity in the area has resumed.

Environmental Noise

- 3.6 Environmental noise measurements were carried out at the site to determine the prevailing ambient noise levels. Noise was measured at Location 1, on the pavement in front of the building, and at Location 2 at the rear of the building. The locations are marked on Figure 1.
- 3.7 The noise measurements were taken on Tuesday 8th July 2020 between 01:00 and 03:00 to represent typical night-time conditions and between 13.00 and 15.00 to represent typical daytime conditions. Measurements were taken simultaneously at Locations 1 and 2. Measurements were taken in sequential 15-minute samples at both locations.
- 3.8 The measurement microphones at Locations 1 and 2 were mounted on tripods around 1.5 metres above local ground level. Location 1 was approximately 1 metre from the existing building façade, hence at Location 1 the measurement microphone was not in free-field conditions and a -3 dB correction is applicable to the measured noise levels to derive the equivalent free-field levels. At Location 2, the microphone was 5 metres from the existing building façade, hence it was in free-field conditions and no correction is required.
- 3.9 The weather conditions throughout the noise survey were dry and overcast, with wind speeds below 5 m/s. Wind was from the north, with temperatures between 16°C and 20°C. These were considered suitable conditions for the survey.

- 3.10 The results of the noise survey (i.e. prior to application of correction factors for Location 1) are detailed in Appendix II. The noise levels are summarised in Table 2. The L_{Aeq} and L_{A90} values in Table 2 are the arithmetic average of the samples at each location for the relevant time period, with the -3 dB correction for Location 1 included.

Table 2: Environmental noise levels summary (dBA)

Location	Time	Noise level		
		L_{Amax}	L_{Aeq}	L_{A90}
1	Day	70 – 89	62	59
	Night	69 – 88	60	51
2	Day	58 – 72	46	41
	Night	51 – 75	41	33

- 3.11 The dominant noise source at Location 1 was road traffic noise and pedestrians on Green Lanes. The dominant noise source at Location 2 was road traffic noise.
- 3.12 The Defra data indicates that the measured noise levels are at least 5 dB(A) below the pre-Covid levels.
- 3.13 On this basis, we propose using the predicted post-Covid noise levels shown in Table 3 for assessment purposes. These include a + 5 dB(A) adjustment.

Table 3: Predicted post-Covid environmental noise levels (dBA)

Location	Time	Noise level	
		L_{Aeq}	L_{A90}
1	Day	67	64
	Night	65	56
2	Day	51	46
	Night	46	38

Reference Noise Levels

- 3.14 Noise measurements were taken inside the existing Admiral premises at 3 Seven Sisters Road, London N7 6AJ from 18.45 to 19.45 on Thursday 29th November 2018. This time was selected following consultation with staff to be representative of a typical busy period. The results are shown in Appendix II and summarised in Table 4.

Table 4: Typical Admiral internal trading noise levels (dB)

Description	Octave Band Centre Frequency (Hz)								A
	63	125	250	500	1k	2k	4k	8k	
L_{eq}	61	63	65	61	60	58	56	48	66
Typical L_{max}	89	85	83	81	79	74	79	69	85

- 3.15 Therefore, the trading noise is characterised by fairly modest average noise levels interspersed with occasional periods of more elevated noise.

Sound Level Meter Details

- 3.16 Noise measurements at Location 1 and inside Admiral Seven Sisters were carried out using a Brüel & Kjær 2250 Type 1 sound level meter (serial no. 3011626). Noise measurements at Location 2 were carried out using a Rion NL-31 Type 1 sound level meter (serial no. 01120844). Both meters were fitted with windshields.
- 3.17 The calibration levels of the meters were checked before and after the surveys with a Brüel & Kjær Type 4231 sound calibrator (serial no. 2412667). No significant calibration deviation was observed.

4.0 ASSESSMENT

Noise Break Out

- 4.1 We understand that the existing glazed frontage and glass entry door for the ground floor will be retained. We would expect this to provide sound reduction of at least 20 dB R_w .
- 4.2 Based on this, the break out noise levels will be well below the background noise levels on Green Lanes. We therefore do not anticipate any issues with break out of noise through the shopfront.

Internal Sound Insulation

- 4.3 Based on the reference noise levels shown in Table 4 and the recommended noise intrusion limit stated in Paragraphs 2.6 and 2.8, we recommend specifying airborne sound insulation performance for the construction between the ground floor gaming area and the flat above to achieve the sound reduction performance shown in Table 5:

Table 5: Recommended sound reduction performance between ground and first levels (dB)

Description	Sound Reduction (dB) Octave Band Centre Frequency (Hz)							
	63	125	250	500	1k	2k	4k	8k
To bedrooms	21	27	36	41	44	48	46	44
To living rooms	16	22	31	36	39	43	41	38

- 4.4 The exact construction between the ground and first floor is not currently known. There is a suspended ceiling in the ground floor space. Above the suspended ceiling is a large air void with a concrete slab above. The floor construction above this can be determined during the next stage.
- 4.5 It was not possible during the site inspection to gain access to the flat above to conduct sound level difference testing to establish the existing acoustic separation between the ground and first floor. We recommend this is carried out at the next stage to confirm whether any sound insulation enhancement is needed.
- 4.6 Based on our experience of acoustic testing of similar constructions, it is feasible that the existing separating floor construction achieves the recommended sound insulation criteria. If not, it may need enhancement, for example, an isolated acoustic ceiling below or other additional linings, as appropriate. This can be confirmed at the detailed design stage, but we understand that the applicant

is happy to agree to a planning condition that requires the submission of details of noise mitigation measures to the Council for approval in the event such measures are determined to be necessary.

- 4.7 We do not anticipate there to be potential for noise disturbance to or from the adjacent retail premises through the party walls.

External Plant Noise

- 4.8 Two new external condensers are proposed to serve the climate control system for the gaming centre. These are to be installed to the rear of the property. These are to replace the two existing condensers in this location, which served the former Betfred but are no longer operational.
- 4.9 Based on our experience of this type of equipment, we do not expect the new equipment to feature tonal or impulsive characteristics readily distinctive against the residual acoustic environment. The condensers will operate on demand and therefore will be intermittent. As such, we have applied a +3 dB acoustic feature correction for intermittency when calculating the rating level of sound from the new condensers in accordance with the guidance in BS 4142.
- 4.10 As stated in BS 4142, "Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context." As the specific units have not been selected at this stage, we will set sound power limits based on achieving a rating level 5 dB(A) below the predicted background sound levels at the rear of the premises, as shown in Table 3 of this report.
- 4.11 We recommend that the new condensers are mounted on the ground to the rear of the premises so they utilise the existing retaining wall to block line of sight from the nearest residences to the condensers. This is predicted to reduce noise levels at the nearest residences by at least 12 dB(A). The noise barrier calculation is shown in Appendix IV. Ground attenuation is taken to be negligible.
- 4.12 There will also be quarter-spherical distance attenuation of 8 metres giving an additional 23 dB(A) reduction. The formula used for quarter-spherical distance attenuation, based on equation 4.5 on page 54 of Fläkt Woods Practical Guide to Noise Control (9th edition, 2005), is as follows:

$$L_p = L_w - 20 \log r - 5$$

Where:

L_p = sound pressure level (dB)

L_w = sound power level (dB)

r = distance (metres)

- 4.13 Based on this, we recommend that the condenser unit models selected have sound power emissions no greater than 62 dB(A) L_w per unit. The predicted condenser noise levels incident on the nearest habitable room window with this limit are shown in Table 6.

Table 6: Predicted Condenser Noise at Nearest Habitable Room Window

Description	dB(A)
Single condenser sound power limit (dB L_w)	62
Sound power level for 2no. condensers simultaneously (dB L_w)	65
Distance attenuation to nearest habitable room window (8 metres, $\frac{1}{4}$ spherical propagation)	-23
Shielding from wall	-12
Resultant condensers emission level at nearest habitable room window (dB $L_{Aeq,15mins}$)	30
Acoustic feature correction	+3
Rating level	33
Predicted night-time background noise level at rear (dB $L_{A90,15mins}$)	38
Comparison (Rating level – $L_{A90,15mins}$)	-5

- 4.14 We recommend that all mechanical equipment in the development is mounted on suitable vibration isolation mounts or hangers to control structure-borne or ground-borne noise.

Outdoor Customer Noise

- 4.15 We have been asked to consider the potential noise impact at night from customers arriving at or leaving from the premises. Based on our experience monitoring the existing Admiral premises at 3 Seven Sisters Road, customers mostly arrive and leave alone or in pairs, and do not making significant noise. We expect similar at this location. Based on expected occupancy levels at the proposed venue, around two to three customers are likely to arrive or leave in a 15-minute period at peak times – the

occupancy numbers for other similar-sized Admiral premises in London from 20:00 to 02:00 from Thursday to Saturday are shown in Appendix III for reference.

- 4.16 If customers have a conversation when leaving, typical speech noise levels are around 65 dB(A) @ 1 metre. Taking into consideration the distance to the nearest residential window, this will reduce to 53 dB(A) at the first floor windows. This is 7 dB(A) below the measured night-time L_{Aeq} levels at the front façade, or 12 dB(A) below the predicted post-Covid levels at the front façade. It would also not be distinguishable from other conversing passers-by. Based on this, noise impact from customers arriving at or leaving from the premises is predicted to be low.

5.0 CONCLUSIONS

- 5.1 A noise assessment of the proposed Admiral premises at 513 Green Lanes, Haringey, London N4 1AN has been carried out.
- 5.2 This assessment has involved carrying out a baseline noise monitoring survey to establish the existing noise climate outside the building. Adjustments to the measured levels have been proposed to account for the atypical noise environment at the time of survey due to temporary government restrictions introduced during the Covid-19 pandemic.
- 5.3 Noise measurements have been made in an existing Admiral premises to provide reference internal noise levels for the expected gaming activities at the proposed development.
- 5.4 Based on the reference noise levels and our recommended internal residential noise limits, suitable sound insulation performance criteria have been specified for the demising construction between the ground and first floors.
- 5.5 A prediction of the noise impact of the new condensers proposed to serve the climate control system for the gaming centre has been conducted. Recommendations for suitable noise limits and vibration mitigation measures have been provided.
- 5.6 Comments on the likely noise impact of customers arriving and leaving the premises at night have also been provided.
- 5.7 By following the recommendations in this report, we conclude that the noise impact of the proposed development will result in no discernible loss of amenity to the adjacent residences.

Figure 1 – Site Location

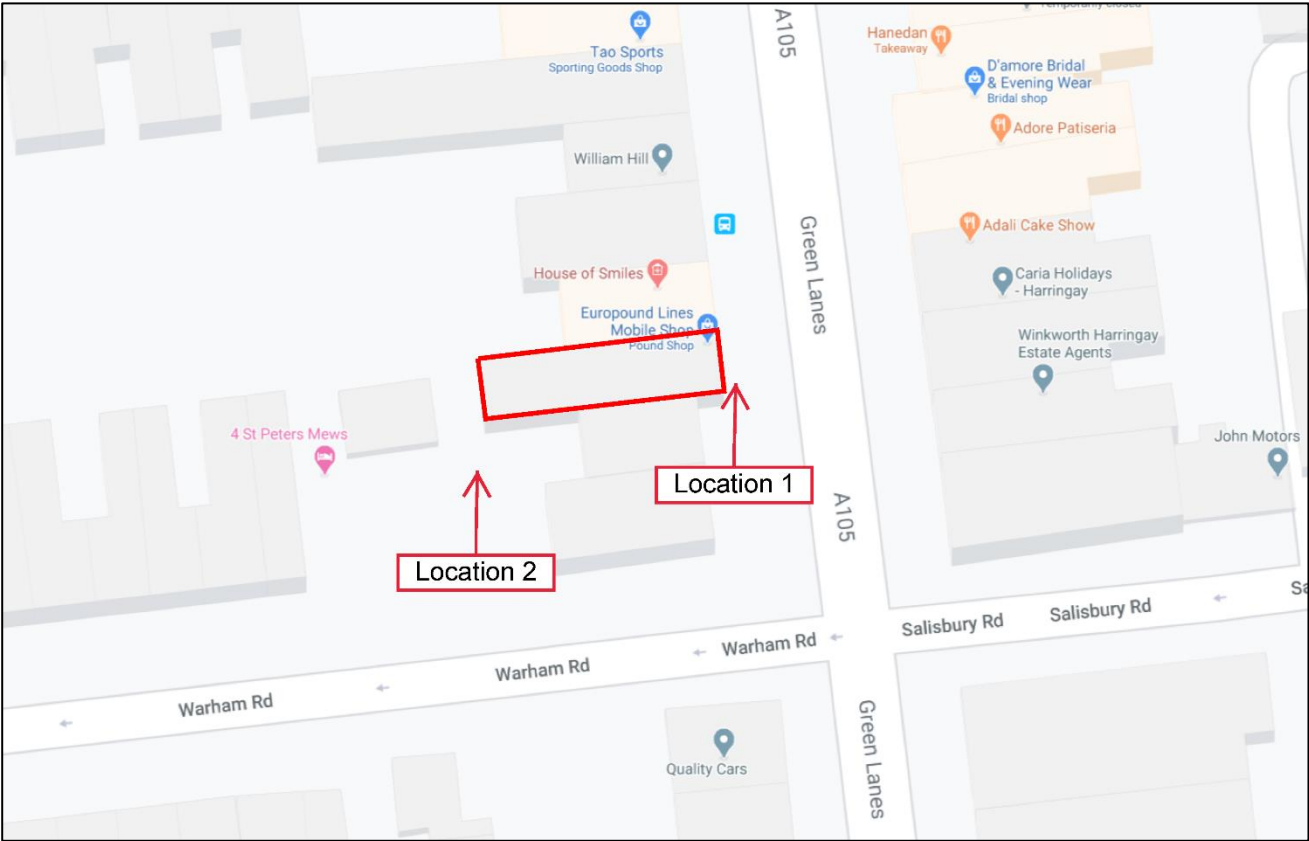


Figure 2 – Defra Daytime Road Traffic Noise

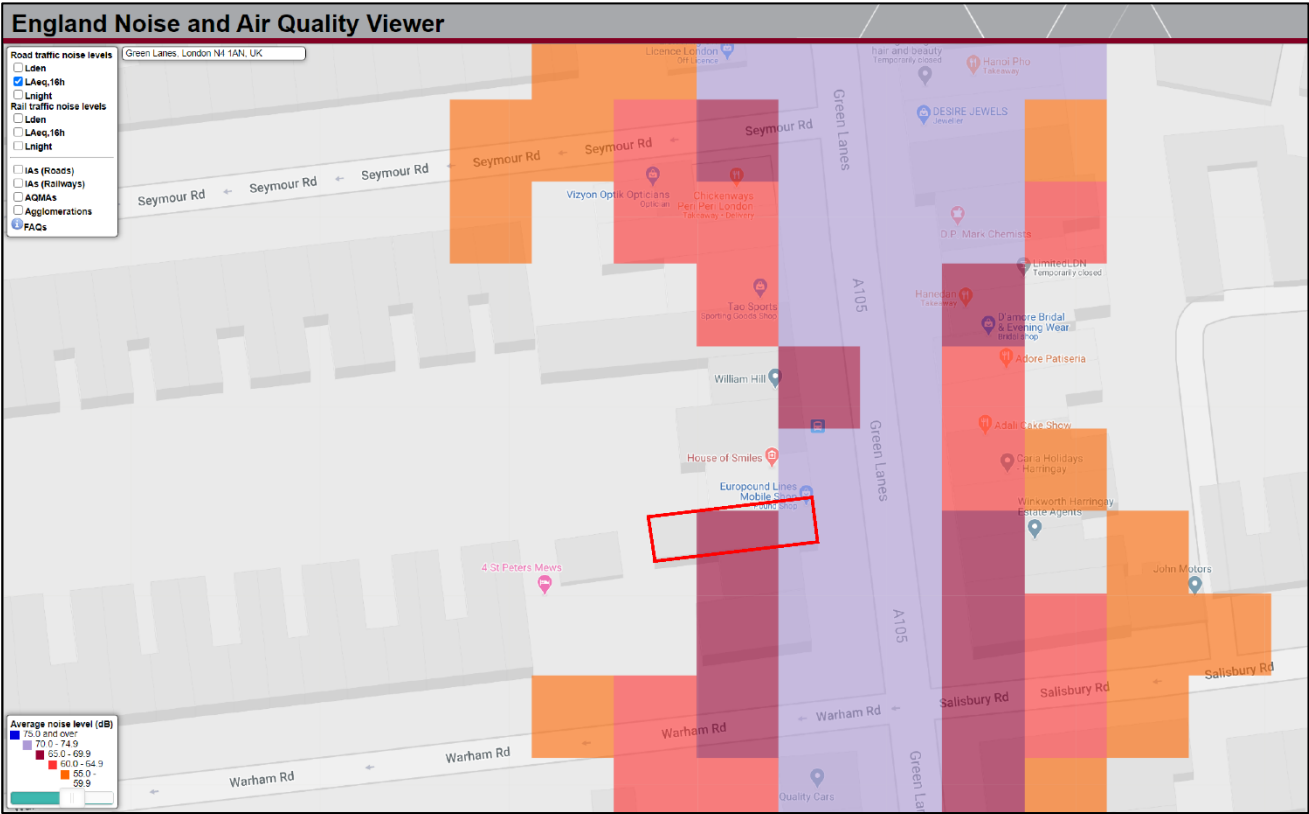
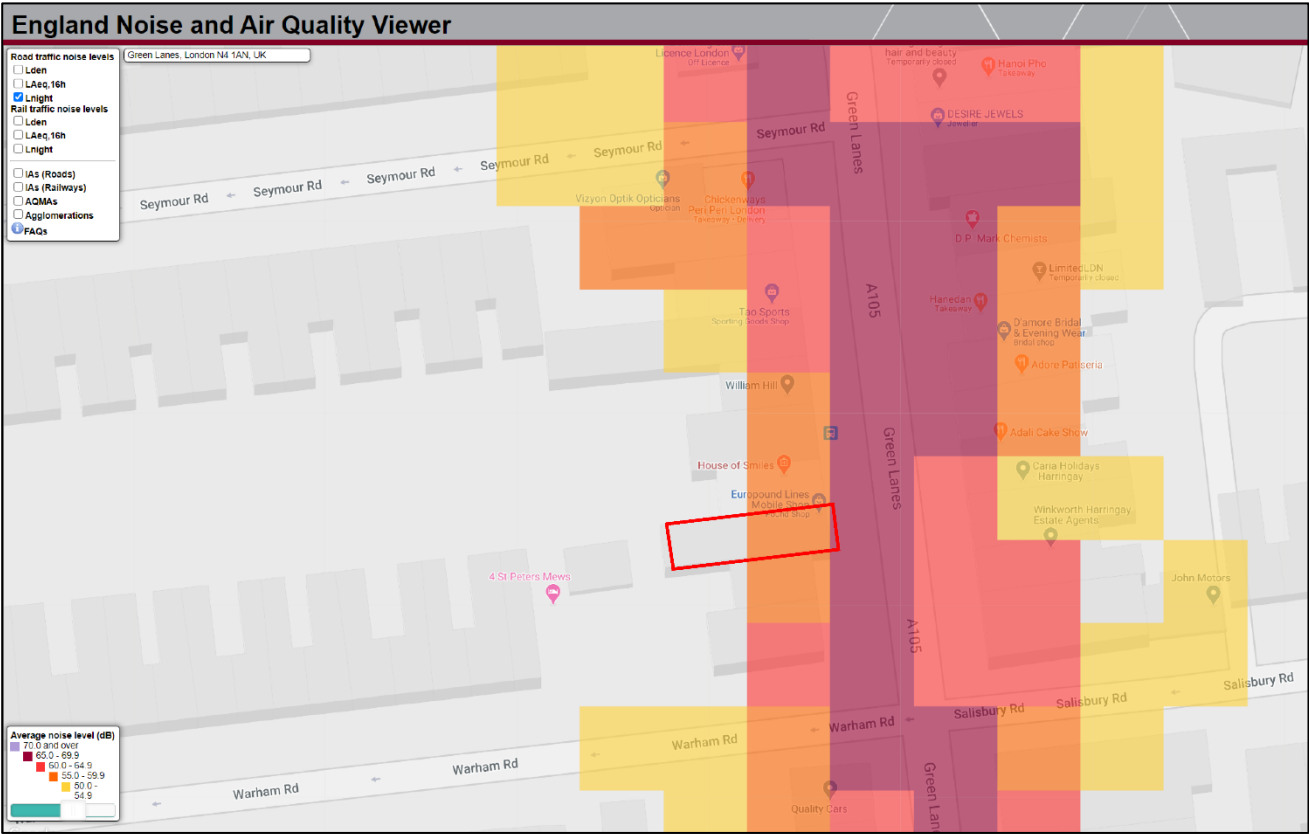


Figure 3 – Defra Night-Time Road Traffic Noise



Appendix I: Noise Units & Indices

Sound and the decibel

A sound wave is a small fluctuation of atmospheric pressure. The human ear responds to these variations in pressure, producing the sensation of hearing. The ear can detect a very wide range of pressure variations. In order to cope with this wide range of pressure variations, a logarithmic scale is used to convert the values into manageable numbers. Although it might seem unusual to use a logarithmic scale to measure a physical phenomenon, it has been found that human hearing also responds to sound in an approximately logarithmic fashion. The dB (decibel) is the logarithmic unit used to describe sound (or noise) levels. The usual range of sound pressure levels is from 0 dB (threshold of hearing) to 120 dB (threshold of pain).

Due to the logarithmic nature of decibels, when two noises of the same level are combined together, the total noise level is (under normal circumstances) 3 dB(A) higher than each of the individual noise levels e.g. 60 dB(A) plus 60 dB(A) = 63 dB(A). In terms of perceived 'loudness', a 3 dB(A) variation in noise level is a relatively small (but nevertheless just noticeable) change. An increase in noise level of 10 dB(A) generally corresponds to a doubling of perceived loudness. Likewise, a reduction in noise level of 10 dB(A) generally corresponds to a halving of perceived loudness.

The ear is not equally sensitive to sound at all frequencies. It is less sensitive to sound at low and very high frequencies, compared with the frequencies in between. Therefore, when measuring a sound made up of different frequencies, it is often useful to 'weight' each frequency appropriately, so that the measurement correlates better with what a person would actually hear. This is usually achieved by using an electronic filter called the 'A' weighting, which is built into sound level meters. Noise levels measured using the 'A' weighting are denoted dB(A) or dBA.

Frequency and Hertz (Hz)

As well as the loudness of a sound, the frequency content of a sound is also very important. Frequency is a measure of the rate of fluctuation of a sound wave. The unit used is cycles per second, or hertz (Hz). Sometimes large frequency values are written as kiloHertz (kHz), where 1 kHz = 1000 Hz.

Young people with normal hearing can hear frequencies in the range 20 Hz to 20 kHz. However, the upper frequency limit gradually reduces as a person gets older.

Glossary of Terms

- $L_{Aeq,T}$ This is the A-weighted 'equivalent continuous noise level' which is an average of the total sound energy measured over a specified time period, T. In other words, L_{Aeq} is the level of a continuous noise which has the same total (A-weighted) energy as the real fluctuating noise, measured over the same time period. It is increasingly being used as the preferred parameter for all forms of environmental noise.
- $L_{Amax,f}$ This is the maximum A-weighted noise level that was recorded during a sample duration, with the sound level meter on the 'fast' setting.
- $L_{A90,T}$ This is the A-weighted noise level exceeded for 90% of the time period, T. L_{A90} is used as a measure of background noise.
- L_W This is the sound power level of a sound source, in decibels, which is 10 times the logarithm to the base 10 of the ratio of sound power radiated by the source to a reference power. The reference power is 1 picowatt (1×10^{-12} watt). The sound power level is the fundamental measure of the total sound energy radiated by a source per unit time.

Appendix II: Noise Survey Results

Location 1

Equipment: Brüel & Kjær 2250 Type 1 Sound Analyser (serial no. 3011626) with tripod and windshield
 Weather: Dry, wind speed below 5 m/s
 Date: Tuesday 7th July 2020

All levels in dB re 20 µPa.

Table A1: Measured external noise levels (dB)

Start time	Duration (h:mm:ss)	L _{Aeq,T}	L _{Amax,f}	L _{A90,T}
07/07/2020 01:00	0:15:00	65	91	55
07/07/2020 01:15	0:15:00	62	72	53
07/07/2020 01:30	0:15:00	63	78	54
07/07/2020 01:45	0:15:00	62	74	54
07/07/2020 02:00	0:15:00	62	74	54
07/07/2020 02:15	0:15:00	65	85	55
07/07/2020 02:30	0:15:00	62	79	53
07/07/2020 02:45	0:15:00	62	77	54
07/07/2020 13:00	0:15:00	64	75	61
07/07/2020 13:15	0:15:00	68	92	64
07/07/2020 13:30	0:15:00	64	72	63
07/07/2020 13:45	0:15:00	65	73	62
07/07/2020 14:00	0:15:00	66	77	62
07/07/2020 14:15	0:15:00	68	84	63
07/07/2020 14:30	0:15:00	64	79	61
07/07/2020 14:45	0:15:00	64	78	61

Location 2

Equipment: Rion NL-31 Type 1 sound level meter (serial no. 01120844) with tripod and windshield
 Weather: Dry, wind speed below 5 m/s
 Date: Tuesday 7th July 2020

All levels in dB re 20 µPa.

Table A2: Measured external noise levels (dB)

Start time	Duration (h:mm:ss)	L _{Aeq,T}	L _{Amax,f}	L _{A90,T}
07/07/2020 01:00	0:15:00	41	56	33
07/07/2020 01:15	0:15:00	41	56	33
07/07/2020 01:30	0:15:00	49	75	33
07/07/2020 01:45	0:15:00	40	54	33
07/07/2020 02:00	0:15:00	39	53	32
07/07/2020 02:15	0:15:00	38	51	32
07/07/2020 02:30	0:15:00	40	58	33
07/07/2020 02:45	0:15:00	40	52	34
07/07/2020 13:00	0:15:00	51	72	40
07/07/2020 13:15	0:15:00	45	62	40
07/07/2020 13:30	0:15:00	45	69	40
07/07/2020 13:45	0:15:00	45	58	41
07/07/2020 14:00	0:15:00	48	71	40
07/07/2020 14:15	0:15:00	46	58	42
07/07/2020 14:30	0:15:00	45	64	41
07/07/2020 14:45	0:15:00	45	61	40

Reference internal noise levels at existing Admiral venue, 3 Seven Sisters Road, London

Equipment: Brüel & Kjær 2250 Type 1 Sound Analyser (serial no. 3011626) with tripod and windshield

Date: Thursday 29th November 2018

All levels in dB re 20 µPa.

Table A3: Measured internal noise levels (dB)

Location	Time start	Time end	L _{Amax}	L _{Aeq}	L _{A90}
Gaming Area	18:45	18:50	78	66	60
	18:50	18:55	91	68	61
	18:55	19:00	89	67	61
	19:00	19:05	81	65	61
	19:05	19:10	72	64	60
	19:10	19:15	77	61	57
	19:15	19:20	90	65	60
	19:20	19:25	82	66	62
	19:25	19:30	77	68	60
	19:30	19:35	79	63	58
	19:35	19:40	82	64	61
	19:40	19:45	80	64	60

Appendix III: Headcount Data from other Admiral premises

Thursday	20:00	21:00	22:00	23:00	00:00	01:00	02:00
Wood Green	2	2	2	2	4	4	3
Hackney	9	8	7	6	4	3	4
Basildon	2	2	3	2	1	2	2
Streatham	4	3	4	4	4	4	4

Friday	20:00	21:00	22:00	23:00	00:00	01:00	02:00
Wood Green	2	5	3	7	5	6	3
Hackney	11	8	9	10	6	7	4
Basildon	4	4	3	3	3	3	3
Streatham	3	2	1	3	3	2	3

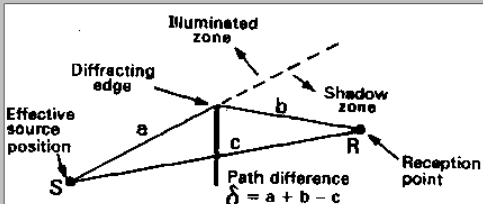
Saturday	20:00	21:00	22:00	23:00	00:00	01:00	02:00
Wood Green	8	6	6	3	2	2	6
Hackney	7	5	8	8	4	4	2
Basildon	4	4	3	2	3	2	2
Streatham	6	7	6	6	4	2	2

Barrier Attenuation	h (Source)	h(Receiver)	h(Barrier)	d(S-B)	d(B-R)	d(S-B-R)	d(SBR)	d(SR)
	1.3	4.0	2.5	1.0	7.0	8.0	8.72	8.44

	a	b	c	Path Diff	Log
	1.56	7.16	8.44	0.277620	-5.57E-01

Frequency (Hz)	500	h(S)-H(R)	h(S)-H(R)/SBR	Theta	h(min shadow)	Zone
Speed (c)	344	2.7	0.3375	0.325496	1.6375	Shadow

	Freq Hz	Barrier Correction dB
	At Frequency (Hz)	
Fresnel		-12.8
Octave Band	63	-7.0
	125	-8.5
	250	-10.4
	500	-12.8
	1000	-15.5
	2000	-18.3
	4000	-21.2
8000	-24.2	



Minimum mass kg/m ²	10.0
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	BS5228							
	63	125	250	500	1k	2k	4k	8k
Fresnel/BS5228	-7	-8	-10	-13	-15	-18	-21	-24

