

Bradley Hall

Planning Statement

226 Station Road, Edgware HA8 7AU

February 2024




RTPI

Chartered Town Planners

Confirmation of Instruction

Client	Luxury Leisure
Site	226 Station Road, Edgware. HA8 7AU
Prepared By	Fraser Tinsley MA (Hons) MBA, MRTPI, Principal Planner
Our Ref	BHPLG00526
Confirmation and Standards	The content of this report, including recommendations/opinions, are based on evidence made available to Bradley Hall unless otherwise identified. We confirm the document has been undertaken in accordance with the RTPI's requirement for planning professionals to meet and maintain high standards of competence as set out in its Ethics and Professional Standards practice advice, updated in 2017, and its Code of Professional Conduct.
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Report Signatories

Prepared By:	Fraser Tinsley MA(Hons) MBA MRTPI Principal Planner	
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1. Introduction

- 1.1 This Planning Statement has been prepared in support of a planning application by Luxury Leisure (“the Applicant”) seeking planning permission from London Borough of Barnet Council (“the Council”) in its role as the Local Planning Authority for the following proposed development at 226 Station Road, Edgware HA8 7AU:

‘Change of use of the ground floor from a retail unit (Class E) to an Adult Gaming Centre (Sui Generis) and staff area with external alterations and associated works.’

- 1.2 Luxury Leisure is part of the Novomatic UK Ltd who operate low-stake Adult Gaming Centres (“AGCs”) under the Admiral brand across the UK. They are the leading operator of amusement gaming within the UK and account for 22.5% of the UK’s Adult Gaming Centre market.
- 1.3 Luxury Leisure together with its sister company, Talarius, currently employ more than 2,500 staff within over 280 AGCs across the UK. This application is submitted in the context of a growth and full rebranding and refurbishment programme to develop and consolidate the Admiral brand. New and refurbished venues provide the latest interactive and technological features in their existing AGCs thus reflecting their quality and excellence gained from many years of experience in this market sector.
- 1.4 This Planning Statement assesses the proposal against all relevant local and national planning policies, guidance and other material considerations. The document forms part of a planning application which also includes the following submission documents:

Application Form
Planning Statement
Site Location Plan
Plans, Sections and Elevations

- 1.5 A separate planning application seeking advertising consent relating to signage will be lodged in due course.

2. Site Description & Development Context

- 2.1 The application relates to the former café / restaurant store which is located on the east side of Station Road in Edgware Town Centre.



FIGURE 1: 226 STATION ROAD (CENTRE UNIT)

- 2.2 The previous occupier ceased trading from the unit in 2020 and the unit has remained vacant since that time. The ground floor was formerly in use as an ice cream parlour / café (Class E).
- 2.3 The ground floor shopfront of the building has undergone significant alterations but a number of original features of the shopfront remain. Above the shopfront, the original early twentieth century façade remains largely intact but needs cleaning and refurbishment. This is formed of brickwork. The roof of the building is pitched and includes dormer windows.
- 2.4 The site is not located within a conservation area and the building itself is not statutorily or locally listed. Otherwise, the site is centrally located within the town centre and has excellent levels of public accessibility as is evident on the map provided at Figure 2 overleaf. This is an extract of the Barnet Unitary Development Plan. The site is designated as forming part of a Primary Retail Frontage.

Planning History

- 2.5 There is no recent planning history relevant to the current proposal for the site.

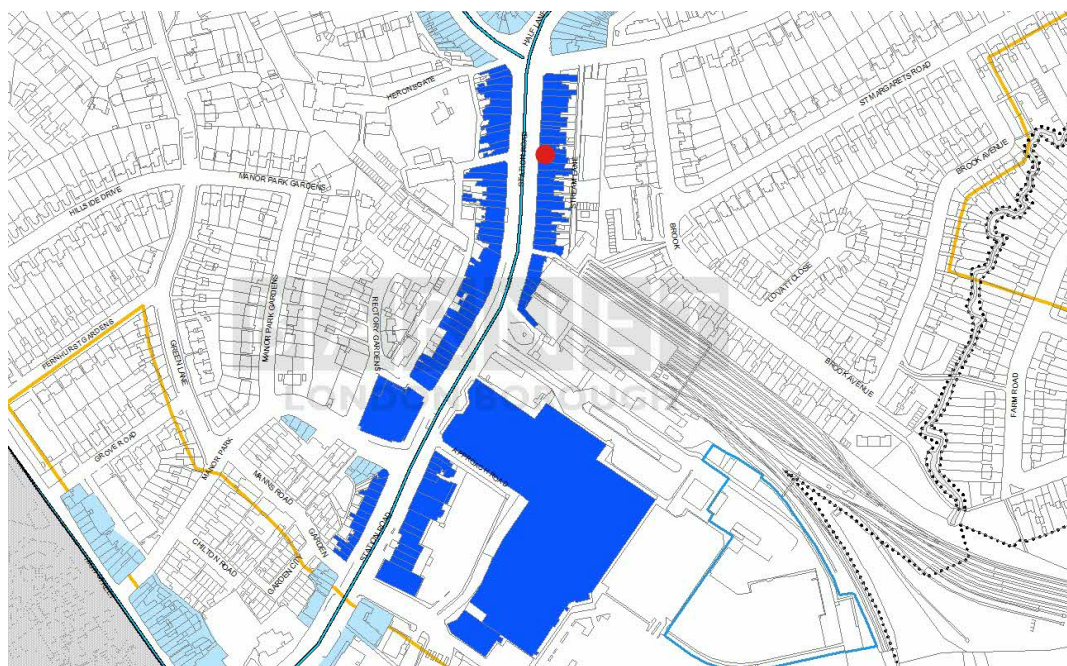


FIGURE 2: SITE LOCATION WITHIN CENTRAL EDGWARE (RED INDICATOR)

UK High Street

- 2.6 The UK High Street has experienced significant challenges as a result of changing retail habits which has forced many retailers to downsize their geographic footprint and consolidate retailing activity. The impact on town centres has been profound with many experiencing vacancy levels significantly above 10%. The Covid-19 pandemic has exacerbated this trend and they are experiencing increasing pressure.
- 2.7 There is an increasing recognition that there is a need for greater flexibility if high streets are to sustain a role as a location for local communities. The MHCLG's response (February 2019) to the Housing, Communities and Local Government Parliamentary Select Committee's 11th Report of Session 2017 to 2019 on high streets and town centres in 2030 recommended that the Government undertake a comprehensive review of planning policy as it relates to the high street, including focusing on use classes and permitted development rights. This was followed up by the introduction of the new Use Class E in September 2020 which recognised the need for greater flexibility of uses on the high street. Class E now incorporates previous Classes A1, A2 and A3 together with B1a, B1b, B1c and some D1 and D2 uses. This is a fundamental shift in the approach to the high street and means many Local authorities will need to adapt their policies and approach to reflect the greater flexibility.
- 2.8 The composition of town centres has changed significantly over the past 20 years and, despite the underlying growth in population and retail expenditure, much of this has diverted to out-of-centre locations and increasingly online. The proportion of retail units within town centres has reduced consistently and conversely the proportion of non-retail services and food/beverage uses has increased.
- 2.9 Many Local Authorities have traditionally resisted changes of use from retail to non-retail main town centre uses such as AGCs. With the change to Use Class E however, such policies seeking to protect traditional retail uses are no longer effective or have any significant degree of relevance. There is also a misconception that retail uses are in some way more beneficial to the vitality and viability of a town centre than other main town centre uses, with limited empirical evidence to support this hypothesis. The key message is that there is a need for greater flexibility with regard to permissible uses on the

high Street if they are to have a sustainable future. If a more flexible approach is not adopted this will likely mean that the trend of increasing vacancy rates and degradation will continue.

3. Description of the Proposed Development

- 3.1 The proposed development would involve the change of use of the ground floor of the building at 226 Station Road, Edgware. HA8 7AU from its existing lawful use as a retail unit (Use Class E) to an AGC (Sui Generis) with external alterations and associated works to the building.
- 3.2 The operation of the unit as an AGC would be on the ground floor only and extend to a gross floor area of 109 sq.m. This would provide gaming for adults aged over-18 in accordance with relevant legislation.
- 3.3 A new shopfront is proposed at ground floor level which would assist in maintaining an active frontage and add activity to the street scene. Figure 3 below shows the proposed shopfront with the fascia signage being the subject of a separate application for advertisement consent to the Council. The shopfront has been designed to complement the upper floors of the building which in themselves would be cleaned and restored as part of the proposed façade works.

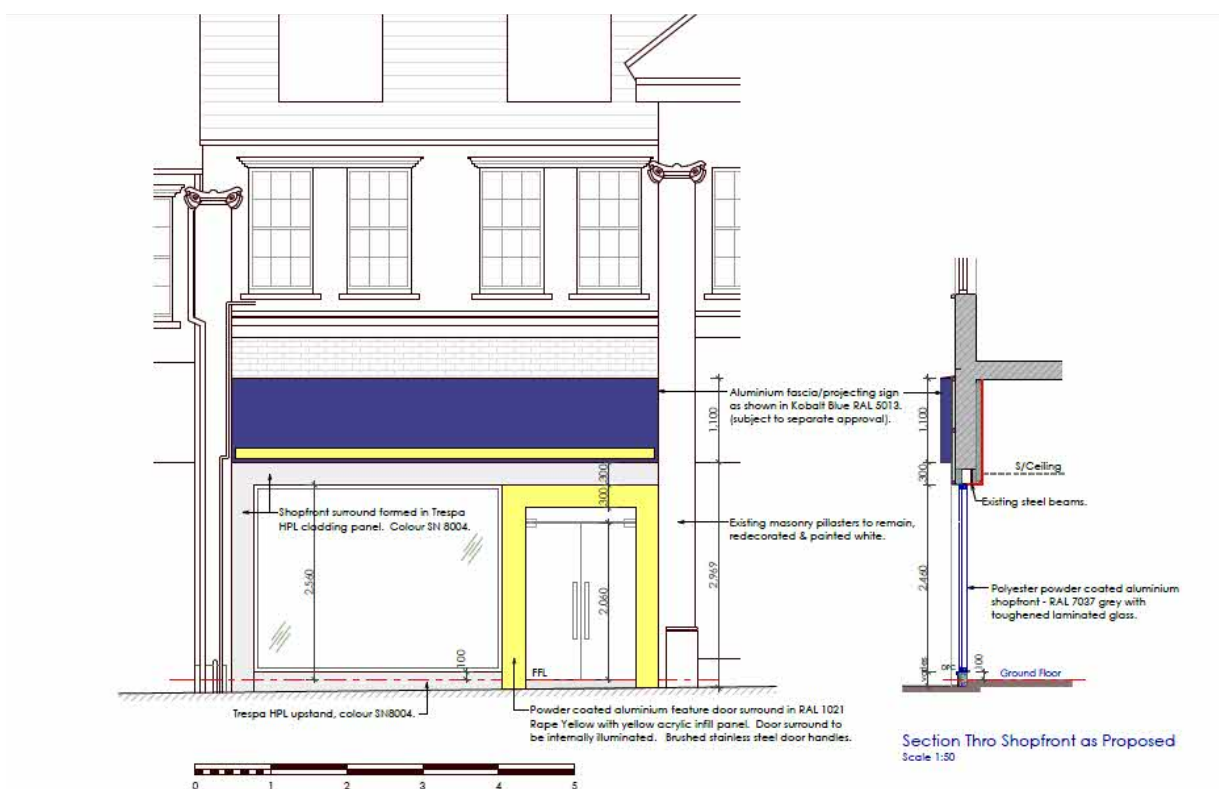


FIGURE 3: PROPOSED SHOPFRONT

- 3.4 The proposed front elevation of the building would significantly enhance this part of the high street compared to the current inactive and degraded frontage to the premises which has been vacant for over 3 years.

Economic Characteristics

- 3.5 Paragraph 11 of the NPPF identifies that there is an economic element to sustainable development. In this context the proposed development would introduce economic activity into Edgware Town Centre and constitute an expansion of the existing leisure and recreational economy.

- 3.6 The proposal would secure the use of this commercial building of which its future is currently uncertain since the premises became vacant in 2000 and there would appear very limited, if any, interest in retail use of the premises in the current retailing climate. The development would also provide investment in jobs (circa 10 jobs to be created) and would provide a high-quality and accessible working environment with excellent staff facilities.
- 3.7 Luxury Leisure and their parent company, Novomatic UK, operate within strict Corporate Social Responsibility (CSR) policies and adhere to the Responsible Gaming Code which contains a number of key criteria. These are as follows:
1. Recognising that prevention is the best form of player protection;
 2. Protecting children and minors;
 3. Encouraging responsible communication;
 4. Reinforcing the need for player responsibility;
 5. Employing professional staff;
 6. Keeping players informed;
 7. Guaranteeing fair gaming; and
 8. Working with experienced partners.
- 3.8 Operationally this means that the company implements a range of best-practice measures across their AGCs to mitigate any risk of anti-social behaviour and/or negative social outcomes. These 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. Keeping players informed and extensively communicating the risks of problem gambling;
 6. Staff-led monitoring to identify those at risk of problem gambling and referral of them to support networks; and
 7. Making available to customers gambling management tools as well as the ability to self exclude from the premises.
- 3.9 A copy of the Applicant's "Security and Social Responsibility Statement" is attached at Appendix A of this Planning and Heritage Statement to help inform the Council's assessment of the proposed AGC use.

4. Legislative and Policy Context

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the “development plan” unless material considerations indicate otherwise. Such material considerations can include Government policy statements, including the National Planning Policy Framework (NPPF) of which a revised version was published by the Government in September 2023.

Local Planning Policy

- 4.2 The adopted Local Plan for the area is The London Plan (2021) and the Barnet Local Plan (2012) which is made up of the Barnet Adopted Core Strategy (2012); and the Barnet Development Management Policies DPD (2012). The site is in a designated Primary Retail Frontage. Relevant Core Strategy Policies are CS1, CS5 and CS6. Relevant Development Management Policies are DM01, DM02, DM04, DM11 and DM17.
- 4.3 Policy CS6 of Barnet's Local Plan Core Strategy 2012, seeks to promote competitive town centre environments and provide consumer choice, whilst ensuring the efficient use of land and buildings in all town centres, encouraging a mix of compatible uses including retail, managed affordable and flexible workspace, leisure and residential that add to the vibrancy of the area, whilst respecting character, amongst other things.
- 4.4 Policy DM01 states that all development should represent high quality design and should be designed to allow for adequate daylight, sunlight, privacy and outlook for adjoining occupiers. Policy DM02 states that where appropriate, development will be expected to demonstrate compliance to minimum amenity standards and make a positive contribution to the Borough. The development standards set out in Policy DM02 are regarded as key for Barnet to deliver the highest standards of urban design. Policy DM11 of Barnet's Local Plan Development Management Policies 2012 (DMP) expects a suitable mix of appropriate uses as part of development within the town centres to support their continued vitality and viability, whilst not creating an over-concentration of similar uses which detracts from the retail function of the town centre. The preamble to policy DM11 states that 'the primary frontage in a town is the strip of most popular, central shops'.
- 4.5 While the Local Plan 2012 is dated it remains the statutory development plan for Barnet until such stage as the replacement plan is adopted and as such applications should continue to be determined in accordance with the 2012 Local Plan. The Council are currently producing a new Local Plan which will replace the Core Strategy and Development Management Policies DPD. The new Local Plan has passed through Examination (Regulation 24) is at Regulation 25 stage and will likely be adopted shortly (Regulation 26). We have therefore based the assessment on both existing and emerging policy which may be the relevant adopted policy at the point of determination of a planning application seeking AGC use of the unit.
- 4.6 Emerging Policy TOW03 Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars will likely be the key material policy consideration in determining proposals for an AGC at this location. This policy is in draft form and is subject to change as a Main Modification in the Inspectors Report following the Examination which was published in August. The {Policy originally stated:

Policy TOW03 Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars

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b. In addressing increasing levels of health inequality within the Borough as well as to preserve the retail-based role of Barnet's town centres the Council will resist the proliferation and over concentration of: betting shops, adult gaming centres, amusement arcades, pawnbrokers, pay day loan shops and shisha bars will not permit proposals for such Sui Generis uses that:

viii) Are not separated from any existing Sui Generis unit in this group by at least two units which are neither units (in uses as highlighted in (b) nor hot food takeaway uses.

ix) Are located within 400m of the boundary of an existing school or youth centre.

x) Are not accompanied by Health Impact Assessments (HIAs) when requested by the Council.

xi) Do not provide active frontages and must have a positive visual impact on the street scene.

xii) Have a significant impact on local community and residential amenity in terms of noise, vibrations, odours, traffic disturbance and litter'.

4.7 The Inspectors Report identified at paragraph 78 the following Main Modification to Policy TOW03

Policy TOW03 - Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars.

78. A MM for soundness and general conformity with the London Plan should include the following changes:

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Policy TOW03 (part b, and sub-criteria viii, xi and xii): re-wording of part b) to ensure that the policy approach is positively prepared relative to provision of the identified uses by indicating the circumstances and locations such as town centres where proposals will be supported. This should include clarifying the intention to address health inequalities, whilst preserving the viability and vitality of Barnet's town centres by avoiding an over-concentration of the stated uses. Associated changes will be required to suitably re-phrase sub-criteria viii), xi) and xii) accordingly as related requirements rather than restrictions, and also to re-number them as subcriteria i) to iii) of part b).

- Policy TOW03 (part b, sub-criterion ix): a requirement that betting shops, adult gaming centres, amusement arcades, pawnbrokers, pay day loan shops and shisha bars should be located more than 400m from the boundary of an existing school or youth centre is not justified by supporting evidence of its necessity to avoid demonstrable harm and therefore, should be deleted.

- Policy TOW03 (part b, sub-criterion x): this should be removed as a subcriterion of part a) and should instead be a separate part of the policy that indicates the specific circumstances where the Council will expect Health Impact Assessments to accompany the related proposals.

4.8 While the revised Policy TOW03 is not available it is clear that to comply with the Inspectors requirements it will be necessary to be modified in the following ways relevant to this application:

1. Be more flexible.
2. Delete the restrictions relating to identified uses and be positively worded identifying when they will be permitted.
3. Delete the 400-metre rule relating to AGC proximity to a school or youth centre.

National Planning Policy Framework (NPPF)

- 4.9 Adult Gaming Centres are accepted to fall within the definition of “main town centre uses” as defined in the NPPF Glossary. Paragraph 87 details sequential testing which main town centre uses are subject to with the presumption being in favour of town centre locations. Paragraph 86 confirms that Local Planning Authorities should support the vitality and viability of town centres; define the extent of town centres and primary shopping areas; and set policies that make clear which uses will be permitted in such locations. Paragraph 81 also requires Local Planning Authorities to recognise the requirements of different forms of businesses and economic development.

Conservation and Shopfront Design

- 4.10 The application site is not located within a designated Conservation Area. Shopfront design will be subject to a separate planning application in due course.

5. Planning Assessment

- 5.1 The proposed development will now be assessed against all relevant national and local planning policy, guidance and other material considerations below.
- 5.2 The main issues for consideration by the Local Planning Authority in this case will relate to:
- Principle of the development and impact on the vitality and viability of the town centre;
 - Impact of the proposal on the occupiers of neighbouring units.
- Design and Character
Health and Wellbeing

Principle of the Development

- 5.3 The application site is located within a designated Primary Retail Frontage in Enfield Town Centre. The proposed AGC is recognised as a “Main Town Centre Use” as defined by the National Planning Policy Framework and, as such, the principle of AGC use in this location is established as being acceptable by the NPPF.
- 5.4 The immediate street frontage surrounding the proposed unit contains a mix of uses predominately in Class E use. There are two Sui Generis betting shops located to the south of the unit in the frontage. These are William Hill at 2018/220 Station Road and Betfred at 200 Station Road. The proposed AGC is not a betting shop and offers a distinct type of use. While both types of use enable licenced gambling, there are clear differences in the character and nature of operation. They serve different market segments and demographics. The Inspector in the context of an appeal at 48 Ballards Lane, Finchley (Appeal Ref: APP/N5090/W/20/3260444 – Ref: 20/3147/FUL) addressed this issue stated at paragraph 11 that:

'Although there are distinct differences between an AGC and a betting shop, there are also some similarities.'

These ‘distinct differences’ identified by the Inspector in the context of that appeal means that betting shops and AGCs should not be considered as the same type of use in the context of the issue of perceived over proliferation of a particular type of use in a location.

Town Centre Vitality and Viability

- 5.6 The proposed AGC would contribute towards Town Centre vitality and viability in two distinct ways. Firstly, the proposal would bring back into active use existing high street premises that has been vacant for three years. Activity would be returned to the street frontage at this location in a scenario whereby the premises otherwise would likely continue to be vacant detracting from vitality and viability. We note that restoring a vacant premises to active use has been identified as a positive factor in the planning balance relating to AGC proposals elsewhere in the Borough. The proposal at 48 Ballards Lane was vacant for four years prior to the grant of the permission. The proposal at 48 Golders Green Road (Appeal Ref: APP/N5090/W/21/3270129 – Ref: 20/5698/FUL) was vacant five years prior to permission being granted. A similar situation exists in the context of the current application and should be considered positively in the planning balance.
- 5.7 The proposed AGC would generate additional footfall in the town centre with survey data and evidence from other Admiral-operated AGCs suggesting that visits contribute to the success of other surrounding retailers through linked trips. The appellant has extensive experience operating AGCs

elsewhere in the country. They do provide active use and shopfronts and complement other uses including retail by increasing footfall in an area through linked trips to other retail and services provision. The applicant regularly undertakes customer surveys and the latest was undertaken in April 2023. This survey was based on 10no. Admiral AGCs operating in London and the south-east, with an overall sample size of 989 customers. The survey confirmed that the main purpose of 73% of Admiral's customers was to visit the AGC itself. Furthermore, of all those surveyed who were visiting the Admiral AGC, 51% undertook linked trips within the same centre. This confirms therefore that for most Admiral's customers the primary purpose was to visit the AGC itself; hence, if the AGC wasn't there many of these customers would not be visiting the centre. A significant number of Admiral's customers also undertake linked trips using other retail and services. A copy of the customer survey results is provided at Appendix B.

- 5.8 The conclusion is that AGCs are an attraction to Town Centres which increase footfall, particularly in the evening and contribute to vitality and viability through ensuring former retail premises remain in active use and contributing to the footfall and linked trips to other retail and services.

Impact on Surrounding Occupiers

- 5.9 The primary potential impact on neighbouring residential amenity associated with the proposed development is the possibility for noise generation associated with the use of the premises as an AGC. This matter has been addressed in many instances in other locations within the Admiral chain of AGCs with the conclusion being that Admiral-operated AGCs do not generate levels of noise that have the potential to adversely impact on residential amenity over and above general retail use. Sound insulation is used within all premises to shield surrounding occupiers from any noise associated with the operation of an AGC and any music played within the premises is always at a background level. Gaming machines are also designed to produce minimal acoustic output and thus avoid any issues that could cause noise and disturbance to surrounding occupiers. The result is that the noise impact of the proposed development would not result in any discernible loss of amenity for adjacent occupiers. The applicant proposes that a Noise Management Plan be required by a pre-commencement condition attached to a Grant of Planning Permission for the proposed development. This approach has been adopted elsewhere in similar scenarios including at appeal at 7 Upper Brook Street in Ipswich where an AGC was recently approved at appeal (Ref: APP/R3515/W/23/3319465) and included residential accommodation above the unit.
- 5.10 It is also noted that this area of the Town Centre already accommodates a number of late night activities such as bars and restaurants. Any noise generation associated with the proposed AGC must be seen in this context and, regardless, any noise and disturbance associated with the proposed use would be significantly less than that associated with other evening economy type uses. Admiral units do not serve alcohol, nor do they allow the consumption of alcohol on-site. This helps to mitigate the potential for anti-social behavior and thus further prevent adverse impacts on residential amenity.

Design and Character

- 5.11 The application site is not located within a Conservation Area, nevertheless, careful attention has been had to ensure an appropriate and high-quality design of the proposed shopfront. The shopfront will be renewed, replacing the existing degraded shopfront shown Figure 1. It will complement the immediate building and wider frontage. The upper level of the building will also be cleaned and refurbished which will bring positive benefits to the wider streetscape. The overall impact of the proposals will be positive and represents a significant improvement to the current situation. As noted above, signage proposals will be subject to a separate advertisement application in due course.

Health and Wellbeing

- 5.12 There is no evidence to suggest that AGCs cause problem gambling or contribute towards other negative health and wellbeing outcomes. Gaming is a legal and licensed activity. AGCs offer a safe and monitored environment for visitors to game as a quasi-social activity. This has discernible benefits compared to other forms of gambling such as online and in less secure environments. Nevertheless, alleged risks to problem gamblers, young people and other vulnerable persons are matters relevant to licensing and management functions, not planning. All Admiral units operate a Think 25 policy to reinforce that under 18-year olds are not able to gamble. In addition, they do not serve alcohol, nor do they allow the consumption of alcohol on the premises.
- 5.13 A final point is that trading hours restrictions are not consistent with recent Appeal decisions relating to AGCs. Decisions in Waltham Forest (Ref: APP/U5930/W/22/3307485), Harrow (Ref: APP/M5450/W/22/3310290) and Bedford (Ref: APP/K0235/W/22/3306897) have specifically allowed for 24-hour trading without compelling evidence in support of restriction. We note the Inspectors comment in respect of the Bedford case which stated:

‘11. The proposed use would be open 24 hours a day, seven days a week. Consequently, this would result in the additional movement of people in an area at times when most of the other shops and uses in this part of the town centre are closed. Nonetheless, and irrespective of whether or not the proposed shop front would allow surveillance of Allhallows, there is no cogent evidence that the ACG and activity associated with this would result in the risk of any unacceptable anti-social behaviour.’

In this context, we request that the LPA reconsider to proposal to restrict trading hours of the AGC as proposed and allow for 24-hour trading.

- 5.14 The applicant has engaged with the Metropolitan Police prior to submission of this planning application. The applicant is also a member of the WalkSafe scheme. Founded in 2020, WalkSafe gives vulnerable people the information they need to stay as safe as possible while they’re walking alone on UK streets. App users can plan their routes using police and community-provided data. WalkSafe also offers hundreds of ‘safe havens’ for people seeking immediate safety while out alone . With more than 280 venues on high streets across the UK, Admiral is perfectly positioned to serve as a major provider of WalkSafe’s ‘safe havens’. The AGC operator will now welcome anyone who seeks safety while walking alone. Details of the applicant’s membership of the scheme are provided at the link below:

<https://walksafe.io/blog/admiral-partners-with-walksafe-to-offer-vulnerable-people-refuges-when-theyre-out-alone/>.

By operating 24 hours a day the unit has the potential to provide a facility to improve community safety in the area.

6. Summary & Conclusions

- 6.1 This Planning and Heritage Statement has been prepared on behalf of Luxury Leisure Ltd to assist Barnet Council in its consideration of a full application for planning permission for the change of use of 226 Station Road, Edgware. HA8 7AU from a retail / commercial unit (Class E) to an Adult Gaming Centre (Sui Generis).
- 6.2 Luxury Leisure and sister company, Talarius Ltd, currently employ over 2,500 staff across over 280 AGCs in the UK and account for 22.5% of the UK's Adult Gaming Centre Market. This application is submitted in the context of a growth and full rebranding and refurbishment programme to develop and consolidate the Admiral brand.
- 6.3 The property is currently vacant and has been unoccupied for approximately three years. No retail tenant has been secured for the premises. The proposed change of use to an AGC would not conflict with existing and emerging Local Plan policies and is acceptable as a matter of principle. Moreover, an AGC use at this location would contribute to the viability and vitality of Edgware Town Centre by increasing footfall. Survey data and evidence from other Admiral-operated AGCs indicates that they contribute positively to other surrounding retailers through linked trips and this general conclusion has been accepted at appeal.
- 6.4 The site is located in a Primary Retail Frontage which offers the most appropriate location for an AGC which is recognised as main town centre use in the NPPF. The proposal would also provide investment in jobs (circa 10 jobs in total being created) whilst providing a high-quality working environment with excellent staff facilities.
- 6.5 The proposed development has been shown to comply with relevant existing and emerging Local Plan and NPPF policy. Significantly, the Inspectors Interim Report required significant revisions to the emerging Policy TOW03 which is of particular relevance to this proposal. It will be necessary to modify the policy in the following ways relevant to this application which are likely to support an AGC proposal:
 1. Be more flexible.
 2. Delete the restrictions relating to identified uses and be positively worded identifying when they will be permitted.
 3. Delete the 400-metre rule relating to AGC proximity to a school or youth centre.
- 6.6 The Applicant enforces a Think 25 policy and undertakes detailed staff training to prevent usage by under-18s. Admiral units do not serve alcohol nor do they allow the consumption of alcohol on the premises. Amplified music is not played and, combined, these measures help to mitigate the potential for anti-social behaviour and prevent adverse impacts on residential amenity. The proposal would not give rise to adverse noise impacts and would comply with the relevant development plan policies in this respect. There is no reason therefore, based on amenity grounds, not to allow Admiral to trade 24/7 in this instance in line with many of Admiral's other existing AGC facilities across the UK.
- 6.7 Sustainable development would be achieved in social, economic and environmental terms in this case and the proposal is compliant with national and local planning policy. It is submitted that in accordance with paragraph 11 of the NPPF the application should be approved by the Local Planning Authority.

Appendix A - Security and Social Responsibility Statement



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 B – Customer Survey



Survey of Admiral Customers, April 2023

- 1- Undertaken within ten Admiral outlets in the London and South East including at Streatham, Camberwell, Hayes, Hammersmith, Penge, Woolwich, Bethnal Green, Romford, Croydon and Shirley
- 2- Sample size 989 customers
- 3- Dates of Survey- Friday 21 April to Thursday 27 April 2023

Q1 What is the main purpose of your visit to Admiral today?		
	Number	%
To use the AGC	719	73
Work	76	7.7
Shopping	137	13.9
Other	57	5.8
Total	989	
Q2 Are you also visiting other shops?		
Yes	496	51
No	476	49
Total	972	
Q3 What is your gender?		
Male	650	66.6
Female	307	31.6
Prefer not to say	19	2
Q4 What is your age?		
Below 36	304	31.2
Over 36	626	64.3
Do not wish to say	44	4.5

The logo for Bradley Hall, featuring the company name in white text on a dark blue square background. A thin teal horizontal line is positioned below the text.

Bradley Hall

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