

**STATEMENT OF CASE**

**FOR**

**ARGYLL AND BUTE COUNCIL  
LOCAL REVIEW BODY**

**REFUSAL OF PLANNING PERMISSION IN  
PRINCIPLE FOR A CHANGE OF USE FROM  
SHOP (CLASS 1) TO LICENCED BETTING  
OFFICE (CLASS 2) AT 11 MAIN STREET,  
CAMPBELTOWN, ARGYLL AND BUTE, PA28  
6AD**

**LOCAL REVIEW BODY REF. 10/0008/LRB**

**PLANNING PERMISSION APPLICATION  
REFERENCE NUMBER 10/00249**

**26<sup>TH</sup> MAY 2010**

## **STATEMENT OF CASE**

The planning authority is Argyll and Bute Council ('the Council'). The appellant is Clyde Leisure Ltd. ('the appellant').

The planning application, reference number 10/00249/PP, for the change of use of a shop (Class 1) to a licensed betting office at 11 Main Street, Campbeltown ("the appeal site") was refused under delegated powers on the 1<sup>st</sup> April 2010. The planning application has been appealed and is subject of referral to a Local Review Body.

### **DESCRIPTION OF SITE**

The application site is an existing retail premises located within Campbeltown town centre.

### **SITE HISTORY**

No relevant planning history relating directly to the appeal site; it is however noted that permission was granted for the subdivision of a retail shop to form one retail unit and one betting shop at 16 Main Street Campbeltown on 1<sup>st</sup> November 2007 (planning application 07/01744/COU refers) This site, together with the current application site, was (and remains) in the Campbeltown core shopping area. Although the general policy issues raised are directly comparable to the current application, this particular permission was for the relocation of an existing and established betting shop from the opposite side of the street (7 Main Street). There was no net increase in betting shops (or other Class 2 non-shop uses) within the core shopping area as a result of this permission and the existing Class 2 betting shop use was extinguished by legal agreement and reverted back to a Class 1 shop use.

### **STATUTORY BASIS ON WHICH THE APPEAL SHOULD BE DECIDED**

Section 25 of the Town & Country Planning (Scotland) Act 1997 provides that where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise. This is the test for this application.

### **STATEMENT OF CASE**

Argyll and Bute Council considers the determining issues in relation to the case are as follows:-

- Whether or not the proposal is acceptable having regard to the provisions of policy LP RET 2 which seeks to prevent the loss of Class 1 retail premises to non-retailing uses within the identified Campbeltown "core shopping area".

- Whether or not the proposed development is likely to give cause to a significant loss of amenity to existing residential development.

The Report of Handling (Appendix 1) sets out the Council's assessment of the application in terms of Development Plan policy and other material considerations. The consultation comments submitted by statutory and other consultees (Appendix 2) and third party representation (Appendix 3) are attached for the purpose of clarity.

## **REQUIREMENT FOR ADDITIONAL INFORMATION AND A HEARING**

The issues raised were covered in the Report of Handling which is contained in Appendix 1, including a summary of third party representations. As such it is considered that Members have all the information they need to determine the case. Given the above and that the proposal is small-scale, has no complex or challenging issues and has not been the subject of significant body of conflicting representation, then it is considered that a Hearing is not required.

The applicant has provided some clarification relating to the operation of the property in respect of the potential for the development to result in a loss of residential amenity by virtue of noise and disturbance. It would be appropriate to seek further comment from the Area Environmental Health Manager to ascertain whether his comments of 8<sup>th</sup> March 2010 which raise concern in these respects remain valid.

## **COMMENT ON APPELLANTS' SUBMISSION**

Having regard to part (7) of the appellants submission it is noted that their case relies heavily upon new information which was not made available to the case officer prior to the determination of the application. In this respect Members are respectfully reminded that Section 43B of the Act restricts the introduction of material in the review; paragraph 38. of Circular 7/2009 sets out that new material will only be permitted where the party can demonstrate that it could not have been introduced earlier in the process, or that it arises as a result of exceptional consequences.

In pre-application discussions with planning officers, the applicant was advised that the proposals conflicted with the normal requirements of policy LP RET 2 and that support could only be given to such a proposal where the applicant satisfactorily demonstrated that:

- (i) Every effort is to be made to retain a lively street frontage.
- (ii) That the premises have been vacant and unused for at least 12 months despite reasonable attempts (including a clear marketing strategy) to market the property/business; OR
- (iii) That the development is part of a wider building refurbishment or re-development which, in the view of the planning authority, will add

value to the economic vitality or built environment of the town centre.

Despite having been advised of the above, the application as submitted did not include information to support the proposal in respect of the requirements of (i), (ii) or (iii) above and was duly refused as being contrary to the provisions of policy LP RET 2.

It is surmised that the new information submitted by the applicant fails to satisfy the requirements of (ii) above as there is no confirmation as whether the property has been satisfactorily marketed.

Having regard to (iii), whilst there may indeed be some merit in the applicant's claim that the proposal would result in the refurbishment of the building it is noted that the supporting information which accompanied the application specified that no exterior modifications to the building with the exception of signage and livery were required for the development – in this respect it is considered disingenuous in the least that the applicant now seeks to introduce new material in the review process which would suggest to the contrary that a wider scheme of building refurbishment works would be involved.

The applicant has also submitted additional material relating to unoccupied commercial premises and an argument that there is a lack of demand for commercial property within Campbeltown town centre; it is again noted that the application as submitted did not contain any supporting information in this regard.

It is contended that any new information relating either to proposals for the improvement/repair of the building or local economic benefit associated with the proposal to justify a case under (iii) above is inadmissible to the review process having regard to Section 43B of the Act as there would have been no barrier to the applicant submitting such information at the time the application was submitted.

Whilst it is recognised that such information relating to the improvement of the building or economic benefit to the locale would have been material to the determination of the planning application it is however advised that any such submissions and consideration should be subject to an opportunity for proper public scrutiny and third party submissions through the mechanism of a revised application for planning permission rather than being introduced as an afterthought in the review process.

## **CONCLUSION**

Section 25 of the Town and Country Planning Act 1997 requires that all decisions be made in accordance with the development plan unless material considerations indicate otherwise.

The application site is located within 'settlement area' pertaining to Campbeltown and more pertinently within the identified "core shopping area"

defined by the Adopted 'Argyll and Bute Structure Plan' 2002 and the Adopted 'Argyll and Bute Local Plan' 2009. Within this zone policy LP RET 2 sets out a presumption against proposals involving the loss of Class 1 retail premises, except where the change is to Class 3 food and drink or, unless it can satisfactorily demonstrated that there is no demand for the property as a retail premises or, that the proposal would add significant value to the economic vitality or built environment of the town centre.

In this particular instance the proposal involves the loss of a Class 1 retail premises to a Class 2 licensed betting office; the applicant has failed in the details provided as part of the planning application to demonstrate that the proposal could be justified in respect of the criteria (i) – (iii) set out under policy LP RET 2. New information relating to a justification of the proposal under (iii) is considered by planning officers to be inadmissible to the review process.

In addition, the Area Environmental Health Manager has raised concern in his consultation response dated 8<sup>th</sup> March 2010, that the nature of the development gives potential to a significant loss of amenity of the area and adjoining residential property by virtue of noise and disturbance arising from the premises.

In view of the above, the proposed development is considered contrary to the provisions of Policies LP ENV 1, LP RET 2 and LP BAD 1 of the Adopted 'Argyll and Bute Local Plan' 2009. Taking account of the above, it is respectfully requested that the appeal be dismissed.

## Appendix 1 – Report of Handling

Argyll and Bute Council  
Development Services

**Delegated or Committee Planning Application Report and Report of handling as required by Schedule 2 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008 relative to applications for Planning Permission or Planning Permission in Principle**

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**Reference No:** 10/00249/PP  
**Planning** Local  
**Hierarchy:**  
**Applicant:** Mr. Martin Ferrie, Clyde Leisure Ltd.  
**Proposal:** Change of use from shop (Class 1) to licensed betting office (Class 2)  
**Site Address:** Shop at 11 Main Street, Campbeltown

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### DECISION ROUTE

Sect 43 (A) of the Town and Country Planning (Scotland) Act 1997

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#### (A) THE APPLICATION

- (i) **Development Requiring Express Planning Permission**
- Change of use from shop (Use Class 1) to a licensed betting office ('bookmakers') (Use Class 2)
- (ii) **Other specified operations**
- Internal alterations to shop. No external alterations proposed within current application
- 

#### (B) RECOMMENDATION:

That permission be Refused subject to the reasons contained in this report.

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#### (C) CONSULTATIONS:

Environmental Services Mid Argyll	08.03.2010	Recommends refusal due to potential for statutory noise nuisance.
Licensing		No reply received.

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#### (D) HISTORY:

None directly relating to the current application site but permission was

granted for the subdivision of a retail shop to form one retail unit and one betting shop at 16 Main Street Campbeltown on 1<sup>st</sup> November 2007 (planning application 07/01744/COU refers) This site, together with the current application site, was (and remains) in the Campbeltown core shopping area. Although the general policy issues raised are directly comparable to the current application, this particular permission was for the relocation of an existing and established betting shop from the opposite side of the street (7 Main Street). There was no net increase in betting shops (or other Class 2 non-shop uses) within the core shopping area as a result of this permission and the existing Class 2 betting shop use was extinguished by legal agreement and reverted back to a Class 1 shop use.

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**(E) PUBLICITY:**

ADVERT TYPE:

Listed Building/Conservation Advert

EXPIRY DATE: 12.03.2010

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**(F) REPRESENTATIONS:**

**(i) Representations received from:**

Four e-mail letters of objection received from: Councillor John Semple, Campbeltown; Mary Turner, Kildalloig, Campbeltown; Deirdre Henderson, Campbeltown; and Marina Carrier, St. Mary's, Pier View, Low Askomil, Campbeltown.

One letter of objection received from the Campbeltown Community Council.

One e-mail letter of support received from Jason McCall – no stated residential or e-mail address.

**(ii) Summary of issues raised:**

- The proposed change of use and loss of a retail shop would be contrary to the viability and vitality of the town centre retail core. This will reduce the attractiveness and vibrancy of the town's retail centre.
- The proposed change of use would be contrary to the Council's development plan for the area.
- The proposed development would be likely to encourage an increase in criminal behaviour and an increase in vandalism in the centre of the town.
- The proposed opening hours would mean that there would be a risk of noise nuisance to surrounding residential properties.
- Moral concerns regarding the promotion of gambling, the temptation of 'poor and vulnerable' people etc. Planners should be providing / promoting and arts / music centre instead.
- Sounds great and what the town needs – more jobs and some competition for Scotbet. Whether there is one gambling facility in town or five makes no difference as the opportunity exists at the moment.

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**(G) SUPPORTING INFORMATION**

Has the application been the subject of:

- |       |  |    |
|-------|--|----|
| (i)   | Environmental Statement:   | No |
| (ii)  | An appropriate assessment under the Conservation (Natural Habitats) Regulations 1994:  | No |
| (iii) | A design or design/access statement:   | No |
| (iv)  | A report on the impact of the proposed development eg. Retail impact, transport impact, noise impact, flood risk, drainage impact etc: | No |

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**(H) PLANNING OBLIGATIONS**

Is a Section 75 agreement required: No

- 
- (I) Has a Direction been issued by Scottish Ministers in terms of Regulation 30, 31 or 32: No**

- 
- (J) Section 25 of the Act; Development Plan and any other material considerations over and above those listed above which have been taken into account in the assessment of the application**

- (i) List of all Development Plan Policy considerations taken into account in assessment of the application.**

'Argyll and Bute Structure Plan' 2002

PROP SET 2 – Retailing and Town Centres  
STRAT DC 1 – Development within the Settlements  
STRAT DC 9 – Historic Environment and Development Control

'Argyll and Bute Local Plan' 2009

LP ENV 1 – Impact on the General Environment  
LP ENV 13a – Development Impact on Listed Buildings  
LP ENV 14 – Conservation Areas and Special Built Environment Areas

LP RET 2 – Change of Use to and from Use Class 1 (Shops) in the Core Shopping Areas of the Main Town Centres  
LP BAD 1 – Bad Neighbour Development

- (ii) List of all other material planning considerations taken into**



**account in the assessment of the application, having due regard to Annex A of Circular 4/2009.**

- Scottish Planning Policy – February 2010.

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**(K) Is the proposal a Schedule 2 Development not requiring an Environmental Impact Assessment: No**

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**(L) Has the application been the subject of statutory pre-application consultation (PAC): No**

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**(M) Has a sustainability check list been submitted: No**

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**(N) Does the Council have an interest in the site: No**

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**(O) Requirement for a hearing (PAN41 or other): No**

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**(P) Assessment and summary of determining issues and material considerations**

This application relates to a vacant ground floor shop premises located within the Campbeltown core shopping area as defined by the Argyll and Bute Local Plan.

This shop has been vacant for several months having been purchased by the Applicant prior to making licensing and planning applications for the currently proposed use.

The application site is the ground floor of a mid terraced property with residential flats above. These premises are located within the Campbeltown conservation area and adjacent to several listed buildings, although the premises themselves are not listed.

It is proposed to change the use of this ground floor shop (Use Class 1) to a betting shop (Use Class 2).

This application is for a change of use only and does not involve any external alterations. The Applicant has stated that new signage will be required but these details do not form part of the current application.

No indication has been given by the Applicant as to the proposed opening hours of this betting shop.

Adopted Structure Plan proposal PROP SET 2 – ‘Retailing and Town Centres’ states that the Council shall seek to sustain the viability and vitality of town centres within Argyll and Bute and states that a sequential approach to retail development will be adopted in accordance with national guidance.

The current expression of national guidance is the 'Scottish Planning Policy' (February 2010) which acknowledges that the planning system has a significant role in supporting successful town centres through its influence on the type, siting and design of development. Planning authorities should assess how town centres can accommodate development and relevant opportunities should be identified in the development plan. The SPP also states that the development plan should identify appropriate locations for new development and regeneration, and can specify a centre's function, for instance allocating specific types and categories of use to certain centres or parts of centres. Paragraph 58 of the SPP states that, "When preparing policies and deciding applications, planning authorities should consider the scale of the developments and their likely impact, including cumulative impact, on the character and function of the centre, the amenity of nearby residents and anti-social behaviour and crime."

The approved and adopted Argyll and Bute Local Plan reflects this Government guidance. Campbeltown is recognized in the Development Plan as one of the six 'main town centres' within Argyll and Bute' each of which have been identified as having 'core shopping areas'. In such areas the vitality of the town centres and the commercial interests of individual shops benefit from ground floor shop premises being located close to one another. The Campbeltown centre is thus split into the 'core shopping area', a compact central zone that includes parts of Main Street (including the application site) and Longrow South; the 'main town centre' which is the zone immediately surrounding the core shopping area and the 'edge of town centre' which is a more extensive outlying zone surrounding the main town centre. Thus Campbeltown has been mapped and assessed for its capacity to accommodate development opportunities with appropriate locations for specific categories of development identified.

To this extent, Local Plan policy LP RET 2 – 'Change of Use to and From Use Class 1 (Shops) in the Core Shopping Areas of the Main Town Centres' states that within the ground floor frontage premises in core shopping area locations, changes of Use Class 1 (shops) to any other use other than Use Class 3 (food and drink) is contrary to this policy unless it is demonstrated that: (i) every effort is made by the applicant to retain a lively street frontage; (ii) the premises have been vacant for at least 12 months despite reasonable attempts (including a clear marketing strategy) to market the property / business or, (iii) the development is part of a wider building refurbishment or redevelopment which, in the view of the planning authority, will add value to the economic vitality or built environment of the town centre.

The proposed change of use would result in the loss of a ground floor shop within the core shopping area and is therefore contrary to Policy LP RET 2, to the Structure Plan strategy PROP SET 2 and to the advice contained within the Scottish Government's SPP. Although the shop premises are currently vacant and have been for a number of months, it appears they were purchased (or optioned) by the Applicant upon (or shortly after) becoming vacant. There has been no substantial evidence submitted to demonstrate that any attempts have been made to market the premises for shop use. No marketing strategy accompanies this application and the proposals do not form part of a wider programme of building refurbishment or redevelopment sufficient to outweigh the policy presumption that exists against the proposed development in this case.

The submitted planning application form contains the assertion by the Applicant that, 'the shop was used as a general retail outlet by the previous owners. It was offered for sale on the commercial property market for a considerable time before being purchased by Clyde Leisure.' The recollection of the planning authority is somewhat different to this but no evidence has been offered by either party to confirm or deny this assertion.

In addition to the above, the proposed use of this building is classed as a 'bad neighbour development' as defined by Schedule 7 of the Town and Country Planning (General Development Procedure) (Scotland) Order 1992.

Local Plan policy LP BAD 1 – 'Bad Neighbour Development' states that such developments will only be permitted where all of the following criteria are satisfied: (a) There are no unacceptable adverse effects on the amenity of neighbouring residents; (b) The proposal includes appropriate measures to reduce the impact on amenity as defined by the use classes order (i.e. noise, light, smells); (c) There are no significant transport, amenity or public service provision objections; (d) Technical standards in terms of parking, traffic circulation, vehicular access and servicing and pedestrian access are met in full; and (e) The proposal does not conflict with any other Structure Plan or Local Plan policy.

In addition to the conflicts with the town centre and retailing policies described above, it is also considered that the proposed use of this building as a betting shop for non-specified opening hours would be likely to be materially harmful to the amenity of the occupiers of the residential flats above and on the general area by virtue of increased noise and disturbance both from the premises themselves and from increased activity and potential nuisance from the behaviour of persons outside the premises and attracted to that location by the presence of a use of this nature. Such nuisance behaviour, particularly that outwith the application site, cannot be controlled by the imposition of planning conditions.

The proposed development is therefore considered contrary to policy LP BAD 1 and to LP ENV 1 which considers development impact on the general environment.

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**(Q) Is the proposal consistent with the Development Plan: No**

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**(R) Reasons why Planning Permission or Planning Permission in Principle Should be Refused:**

The proposed change of use would result in the loss of a ground floor shop within the core shopping area and is therefore contrary to Policy LP RET 2, to the Structure Plan strategy PROP SET 2 and to the advice contained within the Scottish Government's SPP.

In addition to the conflicts with the town centre and retailing policies described above, it is also considered that the proposed use of this building as a betting shop for non-specified opening hours would be likely to be materially harmful to the amenity of the occupiers of the residential flats above and on the general area by virtue of increased noise and disturbance both from the premises themselves and from increased activity and potential nuisance from

the behaviour of persons outside the premises and attracted to that location by the presence of a use of this nature. Such nuisance behaviour, particularly that outwith the application site, cannot be controlled by the imposition of planning conditions.

The proposed development is therefore considered contrary to policy LP BAD 1 and to LP ENV 1 which considers development impact on the general environment.

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**(S) Reasoned justification for a departure to the provisions of the Development Plan**

N/A

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**(T) Need for notification to Scottish Ministers or Historic Scotland: No**

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**Author of Report:** Tim Williams

**Date:** 23<sup>rd</sup> March 2010

**Reviewing Officer:**

**Date:** 1<sup>st</sup> April 2010



**Angus Gilmour  
Head of Planning**

## **REFUSAL REASONS RELATIVE TO APPLICATION REF. NO. 10/00249/PP**

1. The proposed change of use of these premises to form a Class 2 betting shop would result in the loss of a ground floor shop within the defined Campbeltown core shopping area resulting in material harm to the viability, vitality and economic integrity of the area and is therefore considered contrary to Local Plan Policy LP RET 2, to the Structure Plan strategy PROP SET 2 and to the advice contained within the Scottish Government's SPP. No very special circumstances or supporting justification has been submitted by the Applicant that would outweigh the harm to these interests caused by the proposed development.
2. It is considered that the proposed use of this building as a betting shop for non-specified opening hours would be likely to be materially harmful to the amenity of the occupiers of the residential flats above and on the general area by virtue of increased noise and disturbance both from the premises themselves and from increased activity and potential nuisance from the behaviour of persons outside the premises and attracted to that location by the presence of a use of this nature. Such nuisance behaviour, particularly that outwith the application site, cannot be controlled by the imposition of planning conditions.

The proposed development is therefore considered contrary to Local Plan policy LP BAD 1 and to LP ENV 1 which considers development impact on the general environment.

## APPENDIX TO DECISION APPROVAL NOTICE

Appendix relative to application **10/00249/PP**

- (A) Has the application been the subject of any “non-material” amendment in terms of Section 32A of the Town and Country Planning (Scotland) Act 1997 (as amended) to the initial submitted plans during its processing. **No**
- (B) The reason why planning permission has been refused:

**The proposed change of use would result in the loss of a ground floor shop within the core shopping area and is therefore contrary to Policy LP RET 2, to the Structure Plan strategy PROP SET 2 and to the advice contained within the Scottish Government’s SPP.**

**In addition to the conflicts with the town centre and retailing policies described above, it is also considered that the proposed use of this building as a betting shop for non-specified opening hours would be likely to be materially harmful to the amenity of the occupiers of the residential flats above and on the general area by virtue of increased noise and disturbance both from the premises themselves and from increased activity and potential nuisance from the behaviour of persons outside the premises and attracted to that location by the presence of a use of this nature. Such nuisance behaviour, particularly that outwith the application site, cannot be controlled by the imposition of planning conditions.**

**The proposed development is therefore considered contrary to policy LP BAD 1 and to LP ENV 1 which considers development impact on the general environment.**

## Appendix 2 – Statutory and other Consultee Comments

### Other Consultees:

- **Argyll and Bute Council – Environmental Health (8<sup>th</sup> March 2010)**

Argyll and Bute Council  
Comhairle Earra Ghàidheal agus Bhòid



# Memorandum

**Legal & Protective Services**

**Date:** 8<sup>th</sup> March 2010

**To:** planning.maki@argyll-bute.gov.uk

**Attn:** Planning

**Our Ref:** GT/

**From:** Geoff Taylor,  
Environmental Health Officer

**Extension:** 4782

**Planning Application No: 10/00249/PP**  
**Change of use from shop (Class 1) to licensed betting office (Class2)**  
**11 Main Street, Campbeltown, PA28 6AD**

I recommend that approval for this application be refused.

It is likely that noise emanating from activities in and around the betting shop, including shouting and amplified sound from speakers, would have an adverse effect on the amenity of the area. The potential for a statutory noise nuisance to be caused to the residents of the flats above and beside the premises also exists.

**Reason:** In order to protect nearby residents and the amenities of the area from noise disturbance.

Yours sincerely,

Geoff Taylor  
**Environmental Health Officer**

### **Appendix 3 – Third Party Representation**

**Four e-mail letters of objection received from: Councillor John Semple, Campbeltown; Mary Turner, Kildalloig, Campbeltown; Deirdre Henderson, Campbeltown; and Marina Carrier, St. Mary's, Pier View, Low Askomil, Campbeltown.**

**One letter of objection received from the Campbeltown Community Council.**

**One e-mail letter of support received from Jason McCall – no stated residential or e-mail address.**



**MacDonald, Rory**

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**From:** MacLean, Marion on behalf of planning.reps  
**Sent:** 15 March 2010 08:13  
**To:** Williams, Tim  
**Cc:** Clark, Catherine; MacDonald, Rory  
**Subject:** FW: PublicAccess for Planning - Application Comments (10/00249/PP)

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

For your attention...

Marion MacLean  
System Support Technician  
Planning Dalriada House

Tel: 01546 604853  
email: [Marion.MacLean@argyll-bute.gov.uk](mailto:Marion.MacLean@argyll-bute.gov.uk)

-----Original Message-----

From: publicaccess@argyll-bute.gov.uk [mailto:publicaccess@argyll-bute.gov.uk]  
Sent: 13 March 2010 00:31  
To: planning.reps; Williams, Tim  
Subject: PublicAccess for Planning - Application Comments (10/00249/PP)

PublicAccess for Planning - Application Comments (10/00249/PP)

"Jason McCall" has used the PublicAccess for Planning website to submit their comments on a Planning Application. You have received this message because you are the Case Officer for this application or because this is a designated mailbox for PublicAccess comments submissions.

PublicAccessForPlanning - Application comments for 10/00249/PP

"Jason McCall" you have been sent this email because you or somebody else has submitted a comment on a Planning Application to Argyll & Bute planning department using your email address.

A summary of your comments is provided below. Comments were submitted at 13/03/2010 00:30:32 from .

Comments: "Sounds great and what the town needs, more jobs and some competition for Scotbet

Best of luck, whether there is one gambling or 5 in town, makes no difference.... The opportunity is there ATM"

PublicAccess for Planning. (c) CAPS Solutions Ltd.

**Kildalloig  
Campbeltown  
Argyll PA28 6RE**

8<sup>th</sup> March 2010

**Planning applications 09/01423/PP for Adult Gaming Premises and  
10/00249/PP for Betting Shop in Main Street, Campbeltown**

Mr Tim Williams  
Senior Planning Officer  
Argyll & Bute Council  
Ardrishaig  
Argyll

Dear Mr Williams

As a local resident who is on the electoral roll I wish to object to both of the above planning applications on the following grounds:

- The former use of these premises has been retail. The proposed change of use of these properties to gaming and betting will mean loss of retail outlets in the core retail area of the town. This will reduce the attractiveness and vibrancy of the town's retail area.
- The proposed change of use will be contrary to Argyll & Bute Council's development plan for this area.
- The proposed development would be likely to encourage an increase in criminal behaviour and an increase in vandalism in the centre of the town.
- The proposed opening hours would mean that there would be a risk of noise nuisance to surrounding residential properties.

Yours sincerely

Mary Turner

0 58440

CC to: Argyle and Bute Development Services,  
Argyll and Bute Legal and Protective Services  
Cllrs Donald Kelly: John Semple: Rory Colville



St Mary's, Pier View,  
Low Askomil  
Campbeltown  
Argyll PA28 6EP  
24<sup>th</sup> March

Dear Sir or Madam,

Re: Application for License for Licensed Betting Office  
and Adult Gaming Centre,  
11 and 9 Main St. ,Campbeltown

I have been concerned for some time about the development and well-being of Campbeltown and it's people. I wonder what sort of hope planners have for the town and what they desire to provide.

On the one hand I see Campbeltown CARS wanting to make best use and provision of cultural facilities through use of old buildings; on the other I see a very large sign saying 'Nickel 'n Dime' welcoming visitors to the harbour and town. Is it a cheap-skate town we are wanting to promote?

In the same vein I am concerned about the potential licensing of the above premises.

Firstly; there is one betting shop already in the centre and a town of this size does not need two.

Secondly: How can we on one hand spend money on encouraging responsible use of money and resources in young adults, when, on the other hand, we are allowing premises such as these to tempt the vulnerable to waste the money they have. I believe that planners have a responsibility for right decisions and if they do things for expediency – or worse, for financial reasons, they have to live with the consequence of their decisions.

Thirdly: These premises are not shops (something CARS seems to be concerned about). However if planners are wanting to provide for the poor and vulnerable then they need to look at providing work and alternative forms of employment and service. While we encourage activities which do nothing to enhance the worth and value of life and our citizens, particularly the young, we are not seeking justice for these people, or for those that might be drawn in to gaming because they have no other activity. Let the planners provide an art/music centre for example, where the vulnerable can go and develop the gifts they have and become more confident that they have something to offer to society. (See [www.impactarts.co.uk](http://www.impactarts.co.uk) – a Glasgow Arts initiative changing lives.)

I hope to see this town focussing on what is good and life-giving. This will draw visitors and provide work.

Although I do not come under the 3 stipulated groups of people who can object; I believe strongly that these places would affect the whole population of Campbeltown who go into the centre and thus I am affected by these places as I would have to pass them.

Yours sincerely,

(Dr)

Marina Carrier

**MacDonald, Rory**

---

**From:** MacLean, Marion on behalf of planning.reps  
**Sent:** 15 March 2010 08:13  
**To:** Williams, Tim  
**Cc:** Clark, Catherine; MacDonald, Rory  
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System Support Technician  
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email: [Marion.MacLean@argyll-bute.gov.uk](mailto:Marion.MacLean@argyll-bute.gov.uk)

-----Original Message-----

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Subject: PublicAccess for Planning - Application Comments (10/00249/PP)

PublicAccess for Planning - Application Comments (10/00249/PP)

"Jason McCall" has used the PublicAccess for Planning website to submit their comments on a Planning Application. You have received this message because you are the Case Officer for this application or because this is a designated mailbox for PublicAccess comments submissions.

PublicAccessForPlanning - Application comments for 10/00249/PP

"Jason McCall" you have been sent this email because you or somebody else has submitted a comment on a Planning Application to Argyll & Bute planning department using your email address.

A summary of your comments is provided below. Comments were submitted at 13/03/2010 00:30:32 from .

Comments: "Sounds great and what the town needs, more jobs and some competition for Scotbet

Best of luck, whether there is one gambling or 5 in town, makes no difference.... The opportunity is there ATM"

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