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Ms H Smith
Arun District Council
Maltravers Road
LITTLEHAMPTON
BN17 5LF

7 September 2026
By email only: planning@arun.gov.uk

Dear Ms Smith

**Proposed Change of Use to Adult Gaming Centre
58 High Street Bognor Regis PO21 1SP
BR/141/26/PL**

We are retained by clients who occupy premises close to the above property who wish to object to the proposed change of use to a 24/7 hour adult gaming centre

The application unit is located in the town's Secondary Shopping Frontage which lies within the Primary Shopping Area. As such the key policy relating to change of use is Local Plan policy RET DM1.

The policy confirms that retail, financial and professional services and food and drink uses will be permitted subject to certain criteria. These uses have now been subsumed within Class E, which was introduced after the Local Plan was adopted. The proposed use of the premises is however as a sui generis adult gaming centre which is not included in the uses which are deemed to be acceptable. The proposal cannot therefore in principle comply with part 2 of policy RET DM1.

The proposal is also unable to satisfy the three criteria listed under part 2 as follows:

- a. Adult gaming centres are already located and trading at 47-47a High Street and 42 London Road. Betting offices are also located immediately to the east of the site at 50 High Street and 52 High Street. If consent were to be allowed, the proposal would therefore result in no less than five sui generis gambling uses being located in close proximity, resulting in a concentration of non-retail uses which would be to the detriment of the town centre. The proposal would not offer a new service to those living and visiting the town but would merely replicate those facilities which are already present in large numbers. There would therefore be no benefit to the vitality of the town centre.
- b. As demonstrated by the existing adult gaming centres nearby, shopfronts for this type of use are heavily restricted by the relevant licencing regulations. This means views into the unit will be concealed, with operators typically relying upon full height vinyls which obscure the shopfront, meaning the proposed use is unable to provide an active shopfront and cannot therefore comply with criteria b of the policy.

We include below a typical shopfront for this type of use which clearly shows how views are restricted into the unit, failing to provide an active shopfront which would be in keeping with the character of the surrounding area.



- c. The applicant seeks to operate from the premises 24/7 365 days per year. The proposed 24/7 opening will inevitably have a detrimental impact on those living above, opposite and adjacent to this site through increased levels of disturbance and noise.

Whilst the applicant has put forward proposals to mitigate the inevitable noise and disturbance, it is inevitable there will be break out noise and disturbance associated with customers entering and leaving the premises particularly in the early hours of the morning, when most will be trying to sleep. This part of the town centre is not characterised by late night opening with the majority of businesses being closed by early evening. As such we believe the proposal presents a high risk of adversely affecting the quality of life for residents and cannot comply with criteria c.

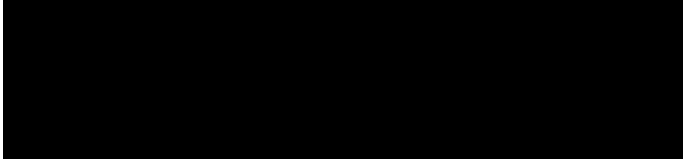
We would also confirm that the proposal also fails to satisfy policy P3 of the August 2026 National Planning Policy Framework. The policy confirms that new development should be appropriate for its location taking into account the likely effect on living conditions. In this case, the proposal will result in unacceptable levels of noise and have an adverse impact on those living above the site.

Statement by the MHCLG 11 August 2026

A final material consideration is the statement made by the MHCLG on 11 August 2026. The statement confirms that there are around 1,450 adult gaming centres across the UK and the Government is seeking to restrict this type of business which doesn't "do much for the local community". The clear intention is to prevent further gaming centres from opening, particularly in circumstances such as this where an overconcentration of similar uses already exists.

We would therefore suggest that the cumulative impact of the socially exclusive nature of the proposed use, together with its "behind closed doors" appearance will have a negative effect on the vitality and character of the area. As such we respectfully suggest that the proposal fails to comply with the various adopted policies outlined above and we trust consent will be refused in due course.

Yours sincerely



**Altine Elias BSc (Hons) MRICS
PARTNER**



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From: Altine Elias [REDACTED]
Sent: 08 September 2026 09:23
To: Planning <Planning@arun.gov.uk>
Subject: 58 High Street Bognor Regis PO21 1SP BR/141/26/PL

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Dear Planning Team

Please find attached a letter for your kind attention

Yours sincerely

ALTINE ELIAS BSc (Hons) MRICS
Partner

[REDACTED]

www.eliastopping.co.uk



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