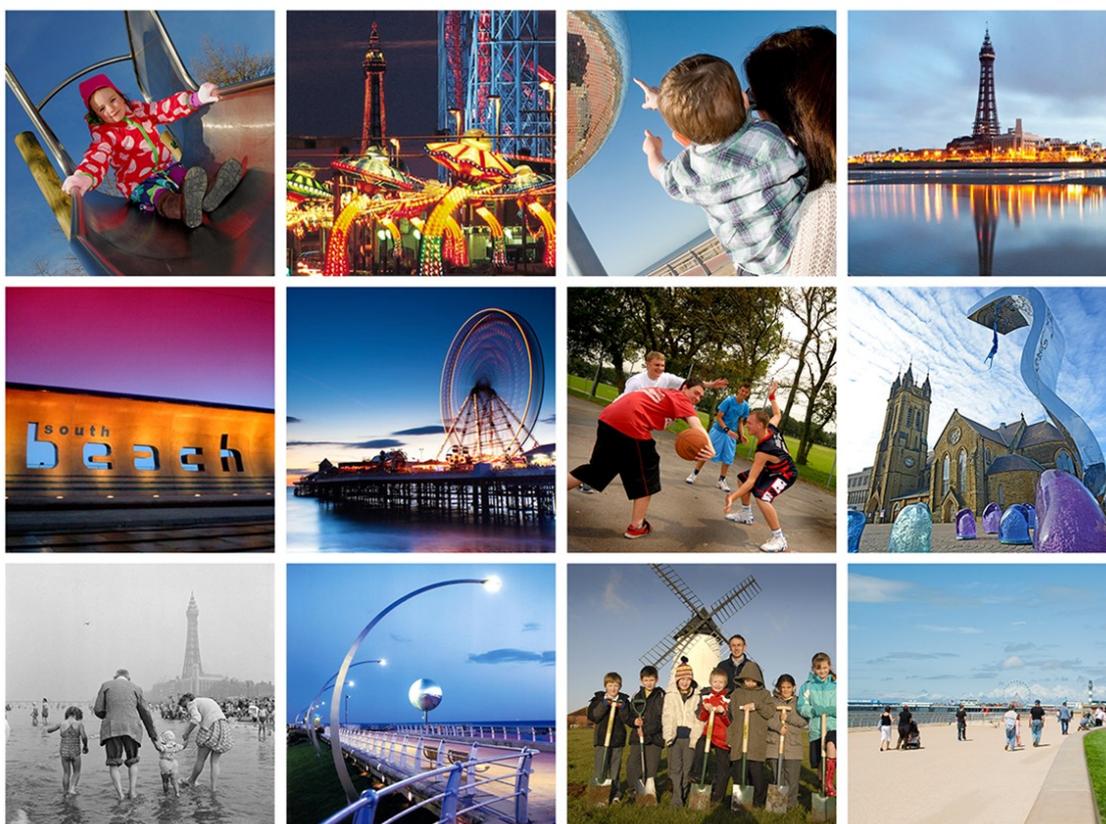


Blackpool Local Plan Part 2 Evidence Base

Betting Shops, Adult Gaming Centres and Pawnbrokers Topic Paper

December 2020

Blackpool Council



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1 Purpose of this report

1.1 This Topic Paper provides evidence to support Local Plan Part 2 policies **DM13: Betting Shops, Adult Gaming Centres and Pawnbrokers in the Town Centre** and **DM14: District and Local Centres** which seek to prevent the clustering of betting shops, adult gaming centres, and pawnbrokers in Blackpool's centres. It also demonstrates how Blackpool's approach is sound, supported by evidence and accords with the National Planning Policy Framework (NPPF).

Adult Gaming Centre	Adult gaming centres (AGCs) are premises for adults providing gaming machines with higher payouts than the more traditional family entertainment centres (amusement arcades) that can be found on Blackpool's Promenade.
Betting Shop	Betting shops are defined as premises where the primary activity is betting services. Betting shops have undergone significant change in recent years with fixed odds betting terminals now accounting for a higher proportion of betting shop revenue than traditional over the counter betting. Gambling legislation limits the number of fixed odds betting terminals to four machines per premises, which have driven a proliferation of betting shops on the high street.
Pawnbrokers	A pawnbroker is a store that offers loans in exchange for personal property as equivalent collateral. If the loan is repaid in the contractually agreed timeframe, the collateral may be repurchased at its initial price plus interest. If the loan cannot be repaid on time, the collateral may be liquidated by the pawnshop through a pawnbroker or second hand dealer through sales to customers. Increasingly many pawnbrokers also function as payday lenders.

2 Background

2.1 The number of betting shops, adult gaming centres, and pawnbrokers has increased in recent years. A study that examined 1,300 UK high streets between 2011 and 2013 showed pawnbrokers/payday lenders and betting shops increased their town centre presence by 17% (Local Data Company and the University of Oxford, 2013, page 5).

2.2 The number of betting shops, adult gaming centres and pawnbrokers has increased in Blackpool in recent years, which is a concern to many residents in the Borough. The Council considers that the proliferation of such uses could damage the function and character of its town, district and local centres. To protect the vitality and viability of Blackpool's centres, and in the interests of the health and wellbeing of its residents, the Council is therefore seeking to prevent clusters of betting shops, adult gaming centres, and pawnbrokers from forming through robust development management policy.

3 Policy Context

3.1 The National Planning Policy Framework 2019 (NPPF) states that there are three overarching objectives to sustainable development: economic, social, and environmental. The planning system should contribute to building a strong, responsive and competitive economy, support strong, vibrant and healthy communities, and protect the natural and built environment. The NPPF states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.

3.2 Betting shops, pay day loan shops, and pawnbrokers are classed as a Sui Generis use. These uses were formerly in Class A2 but were changed to Sui Generis uses in a revision to the Town and Country Planning (General Permitted Development) (England) Order in 2015, following the Government's 2014 Technical consultation on planning. The consultation showed overwhelming support for the proposal to require a planning application for change of uses to such uses.

3.3 At the local level, the Blackpool Local Plan Part 1: Core Strategy is particularly relevant with a key goal to strengthen community wellbeing to create sustainable communities and reduce inequalities in Blackpool's most deprived areas. Furthermore an objective of the Core Strategy is to develop sustainable and safer neighbourhoods.

4 Evidence and Impacts

4.1 The impacts of clusters of betting shops, pawnbrokers, and amusement centres is widely recognised by national publications, other local authorities, and has been the subject of considerable public and media interest. The following section draws together the main points of evidence on how betting shops, amusement centres, and bookmakers can impact on the vitality and viability of the high street and potentially on the health and wellbeing of a community.

Tackling gambling related harm: A whole council approach (November 2018)

4.2 Harmful gambling is increasingly cited as a public health issue which requires a broad response; that is to say, traditional approaches that focus on single interventions do not tend to work at a population level. It is recognised as a complex problem with a large number of different but often interlinked factors - no single measure is likely to be effective on its own in addressing it.

4.3 This publication, jointly prepared by Public Health England and the Local Government Association, provides an overview of problem gambling, and how councils can begin to try to help local residents who are impacted by it. It recognises that Planning teams have a role to play in relation to local gambling premises.

4.4 The document recognises that many local authorities have been extremely frustrated at their inability to prevent the development of clusters of gambling premises, specifically betting shops, in their areas. This became a particular issue following the economic downturn of 2008, which saw betting shops relocating into vacant town centre premises. A particular concern has been the associated concentration of Fixed Odds Betting Terminals in these clusters. Research undertaken by Geofutures for GambleAware has shown that clusters of premises and machines have typically been located in more deprived areas: 'areas close to betting shops tend towards higher levels of crime events, resident deprivation, unemployment, and ethnic diversity...players overall tend to live in neighbourhoods with higher levels of resident unemployment, multiple deprivation and economic inactivity.'

4.5 Neither the planning nor licensing frameworks have provided clear options for refusing new or additional gambling premises. The Gambling Act includes a statutory aim to permit licensing which has made it difficult to refuse new licence applications. However in 2015 Westminster City Council drew on the work they were doing in developing local area profiling when considering a new premises application.

4.6 With the support of and evidence from a large number of residents the council was able to refuse an application for a new betting premises licence in an area with multiple existing premises where the local characteristics had led the authority to identify it as a location with a high risk to those who were vulnerable of harm from gambling. That profiling

and evidence also led to the successful review of an existing betting shop in an area that was identified as posing a risk to those who were vulnerable and being a focal point for potential criminal activity.

4.7 There have been similar challenges in using the planning system to limit the opening of gambling premises. A number of councils previously sought to use Article 4 directions to remove permitted development rights to convert other types of premises into betting shops without the need for planning permission. However, changes to the planning system in 2015 effectively introduced this approach across all areas. As a result of the change, betting shops in England are now classed as *sui generis* (a use that does not fall within any use class). This means that any new betting shop must apply for full planning permission. The only exception to this relates to a new betting shop tenant moving into a unit formerly used (as its last known use) as a betting shop. In this circumstance, the new tenant would be able to operate under the previous user's planning use class.

4.8 This means that planning authorities now have some powers to manage the opening of new or additional betting shops in their areas. If an authority wished to refuse a new application for planning permission it would still need to do so by reference to its local plan and associated evidence base. Local Plans need to be approved through examination by the national Planning Inspectorate, and councils would need a robust evidence base to include restrictions on betting shops.

4.9 The report recommends what councils can do:

- Update local plans to include planning policies relating to betting shops.
- Consider whether and how planning policies relating other gambling premises should be included within local plans.

Health on the High Street: Running on Empty (2018)

4.10 Blackpool has been recognised as having the third most unhealthiest high street in the UK in the Royal Society for Public Health Report *Health on the High Street: Running on Empty* (2018).

4.11 The 2015 initial report recognises there is strong evidence that increasing opportunities – availability and accessibility – to gambling does increase the number of regular and problem gamblers in an area (Ben Cave Associates, 2014). Therefore the presence of bookmakers on the high street, and particularly in areas of dense clustering of betting shops, problem gambling is at its highest.

4.12 Worryingly, Wardle et al (2014)¹² found that gambling machine density was disproportionately greater in areas of socio-economic deprivation, and also in areas with a younger than average population profile. Individuals with the lowest income are already known to gamble the largest proportion of their income compared to other income groups,

and by targeting areas of deprivation, poverty associated with gambling is likely to increase. Clustering of betting shops is a problem facing many areas, particularly in London. Newham in East London for example, has more than 80 betting shops – six per square mile (The Guardian, 2013b). Past relaxation in planning laws has allowed clustering to occur – shops could previously be converted to bookmakers without needing planning permission (Parliament UK, 2014).

The Portas Review (2011)

4.13 In 2011 Mary Portas was appointed by the government to lead an independent review into the future of the high street. **The Portas Review** was published on 13 December 2011. The review states that:

“I also believe that the influx of betting shops, often in more deprived areas, is blighting our high streets. Circumventing legislation which prohibits the number of betting machines in a single bookmakers, I understand many are now simply opening another unit just doors down. This has led to a proliferation of betting shops often in low-income areas.” (page 29)

4.14 Recommendation 13 of the report is to put betting shops into a separate use class so that Local Authorities can control these uses. The government has acted upon this recommendation and in the latest update to the general permitted development order which came into effect on 16 April 2015 betting shops were removed from the A2 use class and made a sui generis use meaning planning permission will always be required for a change to a betting shop use. The Council has responded to this change by adding controls to the Local Plan for betting shops.

4.15 A **paper by the Centre for Social Justice** links high cost credit to problem debt, and problem debt to mental health difficulties, family breakdown, addiction, worklessness and crime (Centre for Social Justice 2013, page 87). High-cost credit refers to payday loans, home-collected credit, and pawnbroker loans. Loans of this type are usually of low value but have high interest rates.

4.16 The paper states that growing pressures on household budgets and restrictions on mainstream lending have led increasing numbers of low-income households to turn to high-cost lenders including pawnbrokers, payday lenders, home credit and illegal moneylenders. The paper points to minority of users for whom high-cost credit can quickly drive them deeper into problem debt (Centre for Social Justice 2013, page 19).

4.17 According to a government survey 62% of households using high-cost credit were in financial difficulties (insolvency action or arrears) compared with 15% of other users of unsecured credit. Furthermore 42% of payday loan customers said that their loan had been rolled over, exposing them to high charges and interest rates (Department for Business, Innovation and Skills 2013, page 92).

Research for the Responsible Gambling Trust, July 2016

4.18 In July 2016, the Local Government Association quoted research conducted by Geofutures for the Responsible Gambling Trust which found that rates of “problem gambling” were higher in areas with clusters of betting shops. The LGA called for the Government to introduce a “cumulative impacts test” to enable councils to reject applications for new betting shops where there are already existing clusters of shops.

Other Local Authorities’ Evidence

4.19 A number of planning authorities have adopted planning policies in relation to betting shops, adult gaming centres and pawnbrokers.

4.20 **Newham Council** received Planning Inspectorate approval for a cumulative impact approach in their local plan (adopted 2018) which introduces limits to numbers of betting shops (and fast food outlets), ensuring they are separated from each other in the street scene. The policy prevents new betting shops from locating in areas where there are already three units of the same use within a 400 mile radius (typically a five minute walk).

In all areas, the need to avoid over-concentrations of specific uses (currently betting shops, takeaways, and nightly-stay hostels) by ensuring that:

Linear concentrations:

- i. No more than two of the same specified uses are adjacent to each other; and
- ii. There is a separation distance of at least two units in other uses between pairs (or groups if more than two units) in the same specified use; or

Area concentrations:

- iii. There are no more than three premises in the same specified use within 400m of each other; and
- iv. A 400m catchment drawn around a proposed specified use does not overlap with any more than two other catchment areas drawn around existing, committed or proposed units in the same specified use.

4.21 The **London Borough of Brent** also has an adopted planning policy controlling betting shops, adult gaming centres and pawnbrokers within their Local Plan (adopted 2016):

Betting shops, adult gaming centres and pawnbrokers will be permitted where it will result in:

- no more than 4% of the town centre frontage consisting of betting shops;
- no more than 3% of the town centre frontage consisting of adult gaming centres or pawnbrokers/payday loan shops;
- no more than 1 unit or 10% of the neighbourhood parade frontage, whichever is the greater, consisting of betting shops, adult gaming centres or pawnbrokers/payday loan shops;
- a minimum of 4 units in an alternative use in-between each

4.22 The supporting text to the policy seeks to ensure there is not an over-concentration of particular uses within any single length of frontage the policy seeks to prevent adult gaming centres, pawnbrokers, betting shops and takeaways locating in close proximity to a unit in the same use. The NPPF states planning policy is to take account of and support local strategies to improve health, social and cultural wellbeing.

4.23 Brent's town centre health checks indicate in the borough pawnbrokers often also provide a payday loan service, and these uses are often indistinguishable from each other, therefore for the purposes of this policy the term pawnbrokers is inclusive of payday loan companies.

4.24 The number of betting shops, payday loan stores and pawnbrokers has increased in **Camden**. The Council considers that a proliferation of these uses could damage the character, vitality and viability of town centres. The Council will therefore monitor the number and impact of betting shops, payday loan stores, and pawnbrokers over the plan period and consider whether evidence shows there is a need to introduce limits on such uses in the future.

4.25 **Islington's** Development Management Policies were adopted in June 2013. Policy

"A. Proposals for cafes, restaurants, drinking establishments, off licences, hot food takeaways, lap dancing clubs, nightclubs, casinos, betting shops, amusement centres and other similar uses will be resisted where they:

- i) Would result in negative cumulative impacts due to an unacceptable concentration of such uses in one area; or
- ii) Would cause unacceptable disturbance or detrimentally affect the amenity, character and function of an area."

DM4.3 (Location and concentration of uses) states:

4.26 Islington adopted the Location and concentration of uses Supplementary Planning Document in April 2016. The SPD states that “All applications for new betting shops will be robustly assessed, with particular regard had to potential adverse impacts on character, function, vitality, viability, amenity and health and wellbeing” (paragraph 7.32).

4.27 **London Borough of Haringey** adopted their Development Management DPD in July 2017. There a specific development management policy relating to Betting Shops:

A Proposals for betting shops will only be permitted where they are appropriately located within the Metropolitan Town Centre, a District Town Centre, or Local Centre having regard to Policy DM42 (Primary Shopping and Secondary Frontages) and DM43 (Local Shopping Centres)

B Proposals for new betting shops will be assessed against their impact on town centre vitality and viability having regards to:

- a) The number of existing betting shops in the centre
- b) The need to avoid over-concentration and saturation of this particular type of use

5 Betting Shops, Adult Gaming Centres and Pawnbrokers in Blackpool

Betting Shops

5.1 Blackpool is recognised in an article by [onlinebetting.org](https://www.onlinebetting.org.uk/betting-guides/bookmaker-cities.html) to be in the top ten places with most betting shops per capita (<https://www.onlinebetting.org.uk/betting-guides/bookmaker-cities.html>). According to the research undertaken, it recognises Grimsby as the worst – with one betting shop per 6,721 people, however our research suggests that there are 33 betting shops in Blackpool Borough which equates to 1 per 4151 of the population which is significantly worse.

5.2 In order to identify the number and concentration of betting shops in Blackpool, we have drawn upon the gambling licensing data to indicate which premises in the borough have a gambling license. This information gives a definitive picture of the number and concentration of betting shops, as without a license the operators would be unable to trade. We have produced a list and map to illustrate the locations in Blackpool's Town Centre, District Centres and Local Centres which are set out in the Appendices.

Pawnbrokers

5.3 In order to identify the number and concentration of Pawnbrokers in Blackpool, we have drawn upon town and local centre survey data to indicate where such premises are located. This information gives a picture of the number and concentration of Pawnbrokers and Payday Loan shops within the council's designated shopping areas. This is available in Appendix 2. Set out below are the key findings from the research. This not a complete picture, however, as there will be some premises which are located outside of these shopping areas.

5.4 There are 13 Pawnbrokers in Blackpool Borough which are all located within the more deprived areas of the town:

- 31% (4) are located within the Town Centre - Three of the Town Centre Pawnbrokers are located within 93 metres of each other.
- 46% (6) are located within South Shore District Centre
- 23% (3) are located within Central Drive Local Centre

Adult Gaming Centres

5.5 There are 8 Adult Gaming Centres in Blackpool Borough. 38% (3) are located within the Town Centre. The remaining Adult Gaming Centres are located within other centres across the Borough (one per centre).

Existing Clusters - Town Centre

5.6 Looking at the uses cumulatively and spatially, it is clear that there is a cluster of the defined uses forming in the Town Centre on Church Street close its junction with Topping Street, with 5 of such uses within 90 metres each other.

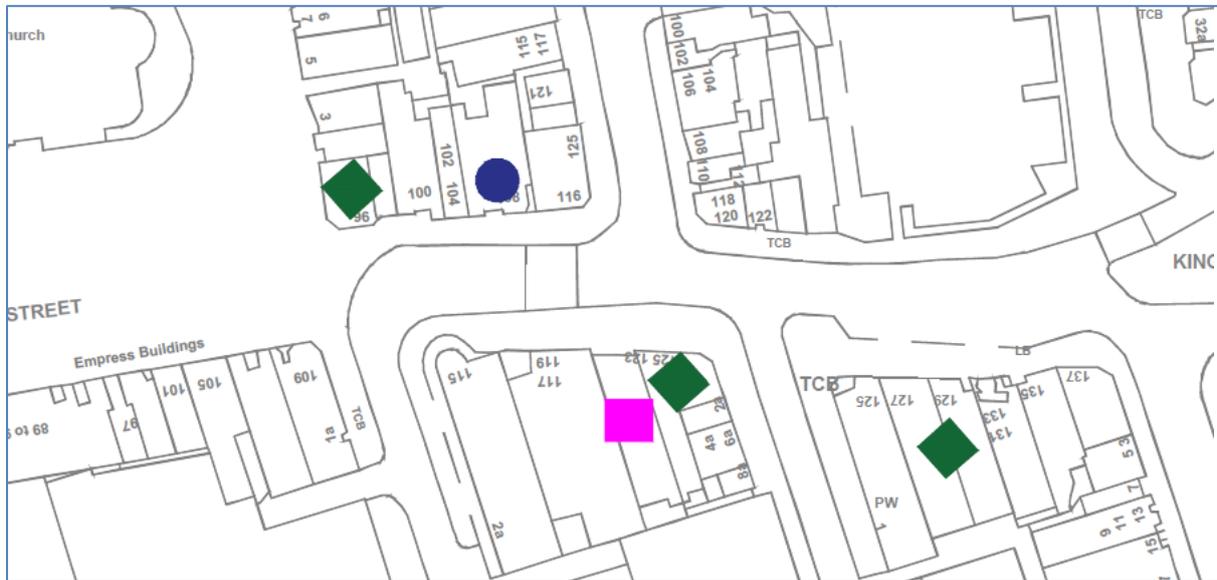


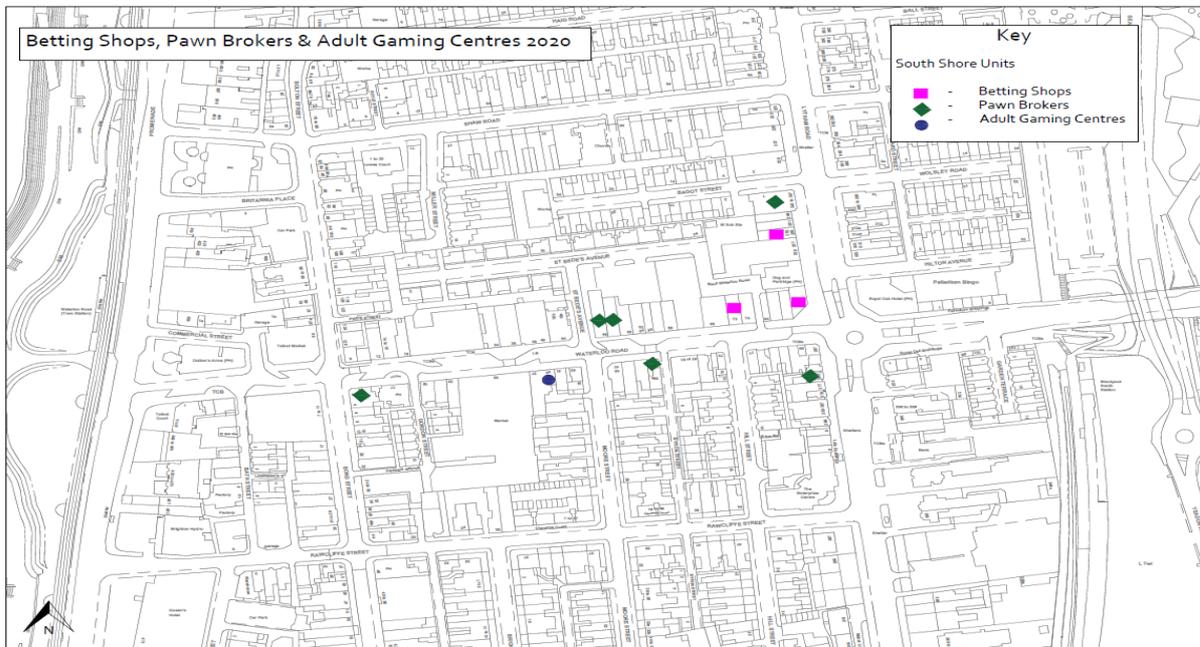
Figure 1: Cluster of uses on Church Street, Blackpool Town Centre



Existing Clusters – South Shore District Centre

5.7 In terms of District Centres, South Shore District Centre raises concern as a significant proportion the Borough’s Betting Shops are located within it.

Figure 2: Cluster of uses in South Shore District Centre



5.8 It is important to ensure these situations identified above are not exacerbated with further uses that will incrementally undermine the vitality and viability of centres involved.

6 Policy Approach

Blackpool Town Centre

6.1 Taking into account all the collated evidence, the following development management policy and supporting text is to be included in the Local Plan Part 2:

Policy DM13: Betting Shops, Adult Gaming Centres and Pawnbrokers in the Town Centre

1. To ensure that Blackpool Town Centre's shopping areas (beyond the primary and secondary frontages) provide a diverse and balanced range of shop units, the council will seek to manage the concentration of amusement centres, betting shops and pawnbrokers.
2. Any proposal for a new betting shop, adult gaming centre or pawnbrokers will only be permitted where it can be demonstrated that the proposal:
 - a. will not impact adversely on the amenity, character and function of an area;
 - b. will not have a detrimental impact on the vitality of the town centre;
 - c. will not result in negative cumulative impacts due to an unacceptable concentration of such uses in one area, ensuring that:

Linear concentrations:

- i. None of the specified uses in the policy are adjacent to each other; and
- ii. There are at least two units in other uses between other betting shops, adult gaming centres or pawnbrokers; or

Area concentrations:

- iii. There are no more than three (in total) betting shops, adult gaming centres or pawnbrokers within 400m of each other.

To ensure that the Town Centre shopping areas remain diverse and balanced, the Council is seeking to limit the amount and concentration of betting shops, adult gaming centres and pawnbrokers within the Town Centre. It is recognised that these particular uses can impact on the vitality and viability of the high street and potentially on the health and wellbeing of a community. Further information can be found in the related Topic Paper.

This approach will also help the Council address strategic and borough wide objectives in relation to improving health and well-being and wider regeneration. The Council will resist applications for such uses where they would cause unacceptable harm to the character, function and amenity of an area or negatively impact on the health and well-being of the borough's residents.

In assessing the likely impacts of a proposal, regard will be given to the type of use, proposed opening hours, size of premises and operation and servicing. The Council will also consider whether the proposal is likely to increase or create a negative cumulative impact in the surrounding area. As such none of the specified uses in the policy will be permitted where they will be adjacent to each other; and there must be at least two units in other uses between other betting shops, adult gaming centres or pawnbrokers. In addition there can be no more than three (in total) betting shops, adult gaming centres or pawnbrokers within 400m of each other.

These specified uses will not be permitted in the Town Centre's primary and secondary frontages, as set out in policies DM12 and DM13.

District and Local Centres

6.2 In order to protect the vitality and viability of the Borough's District and Local Centres, the following development management policy and supporting text will resist the concentration of non-A1/A2/A3/A4 uses which includes amusement centres, betting shops and pawnbrokers in order to support the vitality and viability of the centres

Policy DM14: District and Local Centres

1. The Council will support proposals that safeguard and enhance the role of the district and local centres defined on the Policies Map.
2. Proposals for shops (Class E(a)), offices (falling under Class E(c)), cafes and restaurants (Class E(b)) and pubs/bars/drinking establishments (sui generis) appropriate to the scale and function of the centre and which would reinforce the centre's role will be supported.
3. The expansion of shopping and other commercial uses into adjoining residential streets by the piecemeal conversion of individual properties will not be permitted. Proposals to extend the shopping frontage of these centres will only be allowed if they involve frontages that are abutting an existing shopping frontage, are in scale with the existing centre and can be achieved without harming residential amenity.
4. Proposals for uses not described in 2. above (including residential and sui generis uses) will only be permitted in exceptional circumstances where they would not undermine the retail function, role and character of the centre. Any proposal that creates an over-concentration of uses not identified in 2. above or has a significant adverse effect on the amenity of existing residents will not be permitted.

:

5. The impact of any proposal on the retail function of a centre will consider:
 - a. the use proposed and its compatibility with nearby uses;
 - b. the current vitality and viability of the centre;
 - c. the use proposed and whether it would lead to an over concentration uses not described in 2. above ;
 - d. the site's location and prominence within the centre;
 - e. the level of vacancies within the centre;
 - f. the need to maintain a retail core within the centre;
 - g. the viability of the continued use of the property as a use described in 2. above ;

6. Any proposal for a Hot Food Takeaway use (sui generis) must also accord with Policy DM16 'Hot Food Takeaways'.

Blackpool's District and Local Centres are identified on the Policies Map. These centres operate successfully and this policy seeks to protect and enhance them.

District Centres provide for a range of convenience shopping, comparison shopping, pubs/restaurants, office uses and other service uses. They are also a focus for social and community uses for Blackpool's neighbourhoods.

The District Centres are:

- South Shore (Waterloo Road)
- Bispham
- Highfield Road
- Whitegate Drive
- Layton

Local Centres provide for day-to-day convenience shopping needs and other supportive uses readily accessible by a walk-in local catchment and the Council recognises their importance. Proposals that would lead to the loss of convenience and other retailing from local centres would particularly disadvantage the elderly and less mobile members of the community.

There may be exceptional circumstances when an appropriate alternative use is considered within a District or Local Centre. It must be robustly demonstrated that the proposal will not undermine the remaining retail/service function of the centre, having regard to the criteria set out in the policy.

7 Conclusion

7.1 The policy approach to betting shops, pawnbrokers and adult gaming centres in the Local Plan Part 2 as set out in Section 6 is considered to be consistent with national policy in supporting the continued success, vitality and viability of Blackpool's centres. It is also consistent with the Blackpool Local Plan Part 1: Core Strategy which supports development that encourages healthy lifestyles and addresses the Council's health priorities and protects the vitality and viability of Blackpool's centres.

7.2 The policy approach is positively prepared as it plans to maintain an appropriate mix and balance of uses on the high street. The policy is not a ban on betting shops, adult gaming centres or pawnbrokers, but rather seeks to stop clusters of these uses from occurring which may harm the vitality and viability of Blackpool's centres.

7.3 The policy approach is justified by evidence showing firstly that the clustering of payday lending, betting shops, and pawnbrokers is occurring in the borough and secondly that concentrations of these uses can harm the vitality and viability of centres, and have been linked with health and wellbeing impacts. For the reasons set out above, the Local Plan's approach is considered to be justified, effective, positively prepared and consistent with NPPF and is therefore considered to be sound.

Appendix A – List of Betting Shops in Blackpool Borough

Premises Name	Premises Address	Centre
Coral	329 Red Bank Road	Bipham DC
Betfred	83 Highfield Road	Highfield DC
Betfred	45 Red Bank Road	Bispham DC
Betfred	285 Devonshire Road	Devonshire Road LC
Ladbrokes	55 - 59 Dickson Road	-
Ladbrokes	54 Coronation Street	-
William Hill	327 - 329 Whitegate Drive	Whitegate Drive LC
William Hill	88 - 90 Talbot Road	Town Centre
William Hill	5 Squires Gate Lane	Sq Gate Lane/Clifton Dr LC
William Hill	74 - 78 Bond Street	-
William Hill	69 - 71 Highfield Road	Highfield Road DC
William Hill	7 Westcliffe Drive	Layton DC
William Hill	100 Waterloo Road	South Shore DC
William Hill	121 Church Street	Town Centre
William Hill	18 Foxhall Road	-
William Hill	22 - 28 Cherry Tree Road North	Cherry Tree Road Nth LC
William Hill	45 Whitegate Drive	Whitegate Drive DC
William Hill	142 - 144 Central Drive	Central Drive LC
William Hill	10 Central Drive	-
William Hill	20 Market Street	Town Centre
William Hill	327 - 329 Dickson Road	Dickson Road LC
William Hill	380 Talbot Road	Talbot Road LC
William Hill	57 - 59 Ansdell Road	Ansdell Road LC
William Hill	68 Red Bank Road	Bispham DC
Megabet	49 Highfield Road	Highfield Road DC
Betfred	73 Vicarage Lane	Vicarage Lane LC
Betfred	62 - 64 Whitegate Drive	Whitegate Drive DC
Betfred	72 Waterloo Road	South Shore DC
Ladbrokes	84 Church Street	Town Centre
Betfred	4 Bank Hey Street	Town Centre
Coral	253 Lytham Road	South Shore DC
Coral	43 - 45 Church Street	Town Centre
Betfred	19 - 21 Westcliffe Drive	Layton DC

Appendix B – List of Pawn Brokers in Blackpool Borough

Address	Centre	Business Name
171 Central Drive	Central Drive Local Centre	Mr Cheaps
97-99 Central Drive	Central Drive Local Centre	H and T Pawnbrokers
95 Central Drive	Central Drive Local Centre	Nathan and Co
15 Waterloo Road	South Shore District Centre	Albermarle Bond
46 Waterloo Road	South Shore District Centre	Cash Generator
48 Waterloo Road	South Shore District Centre	Cash Converters
243-247 Lytham Road	South Shore District Centre	Money Traders
273 Lytham Road	South Shore District Centre	J and L Carr
57-59 Waterloo Road	South Shore District Centre	Cash for Gold

Town Centre Pawnbrokers:

Address	Business Name
22-26 Dickson Road	Money Traders
98 Church Street	Nathan and Co
100 Church Street	North West Pawnbrokers
127-129 Church Street	Cash Converters

Appendix C – List of Adult Gaming Centres in Blackpool Borough

Name	Address	Centre
Warwicks Amusements	106 - 108 Church Street	Town Centre
Warwicks Amusements	118 - 120 Talbot Road	Town Centre
Warwicks Amusements	42 Abingdon Street	Town Centre
J.W.T. Leisure	116 Central Drive	Central Drive LC
Warwicks Amusements	10 - 12 Westcliffe Drive	Layton DC
J.W.T. Leisure	39 Waterloo Road	South Shore DC
Reel to Reel	17 Highfield Road	Highfield Road DC
Harts Amusements	6 - 10 Red Bank Road	Bispham DC

Appendix D – Map of Town Centre Betting Shops, Adult Gaming Centres and Pawnbrokers

