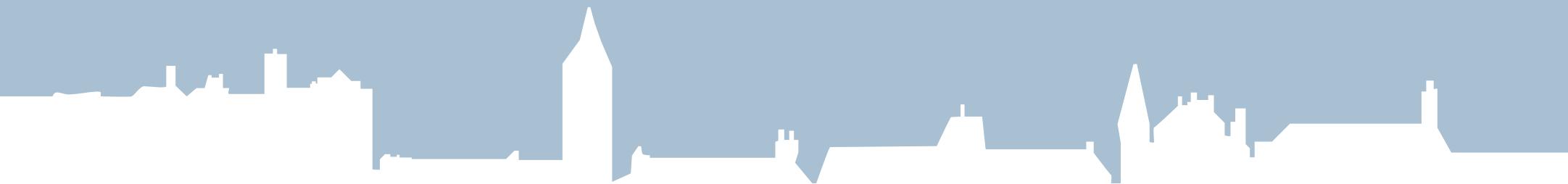


Town Centre Planning Pilots Programme



West Dunbartonshire Planning Guidance on Pay Day Loan and Betting Shops 'How To' Guide

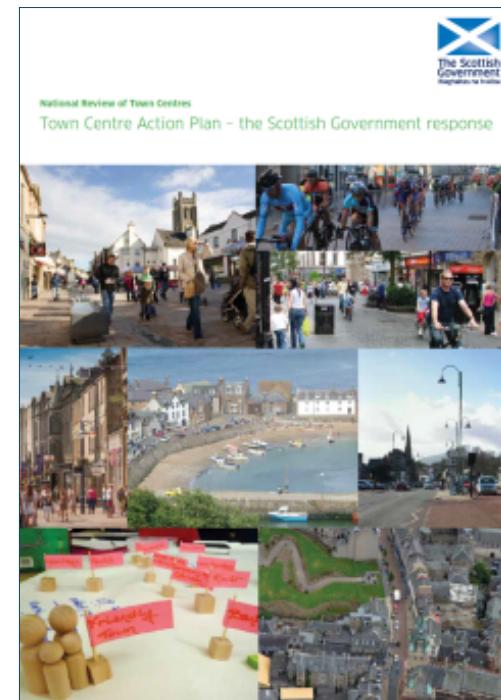
Town Centres Planning Pilots Programme



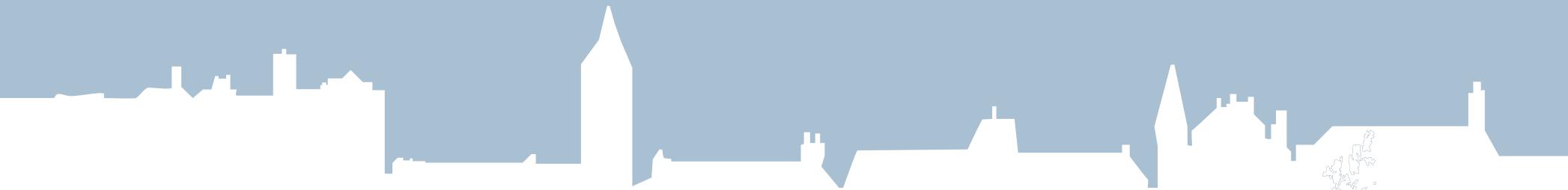
Town centres are at the heart of their communities and can be hubs for a range of activities. It is important that planning supports the role of town centres to thrive and meet the needs of their residents, businesses and visitors for the 21st century.

The **Town Centre Action Plan** (November 2014) sets out various actions to bring a focus on town centres.

One of its key themes is **Proactive Planning**, the Scottish Government fully embraces the Town Centres Review recommendation for a simple, encouraging and pro-active planning policy in support of town centres.



[Town Centre Action Plan](#)



We committed in the Action Plan that:

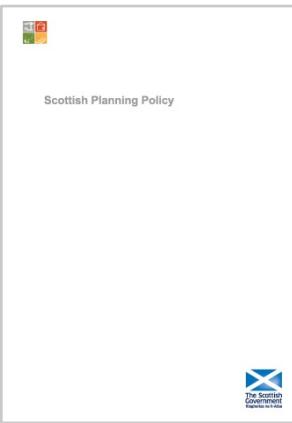
We will identify pilots with interested planning authorities who wish to consider collaboration and test approaches which could help simplify planning processes in town centres.

The Town Centres Planning Pilots Programme is working with **10** planning authorities and Heads of Planning Scotland (HOPS) supporting **15** pilots based around **7** key areas, as shown on the map.

- This 'How To' guide sets out the process and thoughts behind the Planning Guidance prepared by West Dunbartonshire Council on pay day loan and betting shops.

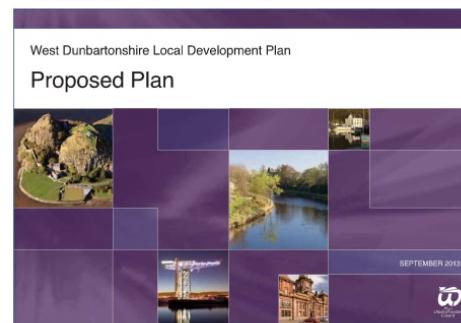


Policy links



Scottish Planning Policy (2014) recognises there were concerns about the clustering of betting offices and high interest lending premises in local and town centres.

It provides the basis for development plans to include policies where further provision of such uses would undermine the character and amenity of centres or the well-being of communities.

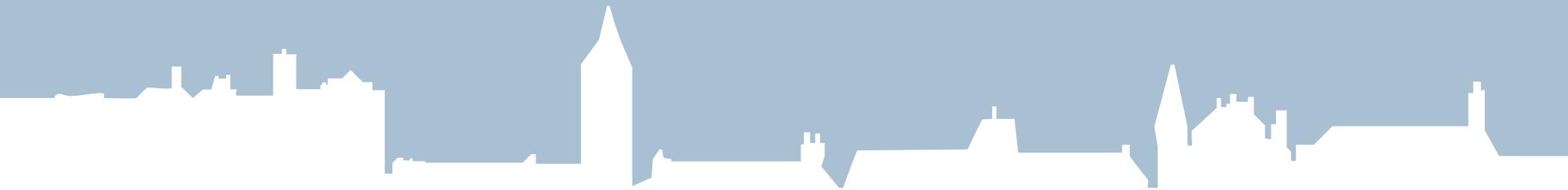


The Local Development Plan identified core retail areas within town centres and recognised the concern about the proliferation of Class 2 uses in some parts of the centre. It set a policy context for changes of use from retail.

Policy SC2

7.3.2 Proposals for the change of use of ground floor Class 1 uses within the core retail areas will be assessed in terms of:

- a) whether the change would significantly reduce the retail offer of the core retail area, or parts of it;
- b) whether the change would lead to the concentration of a particular use to the detriment of the town centre's vitality and viability;
- c) the contribution the proposed use would make to the vibrancy of the town centre by increasing footfall;
- d) the availability and suitability of other locations in the town centre for the proposed use to locate; and
- e) whether the unit affected by the proposal has been vacant and suitably marketed for retail use.



Project Details: The story behind it all...

West Dunbartonshire Councillors have been at the forefront of campaigns and discussions on the proliferation of pay day lending and betting shops on our high streets. The council was becoming increasingly frustrated at the overturning on appeal of decisions to refuse applications for such uses. It was considered that stronger guidance and evidence was required on the subject.

South Sylvania Way in Clydebank encapsulated the problem:

2 betting shops and permission for **1** more.

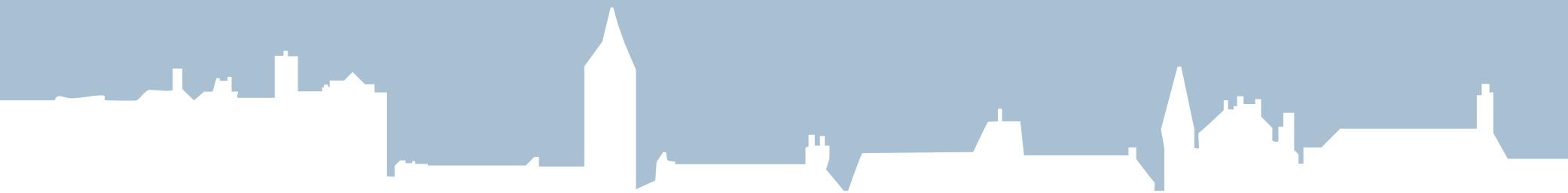
3 premises offering high interest loans and consent for **1** more.

3 permissions for betting shops/ money shops granted on appeal in short period – vacancy/potential vacancy of unit a determining factor.

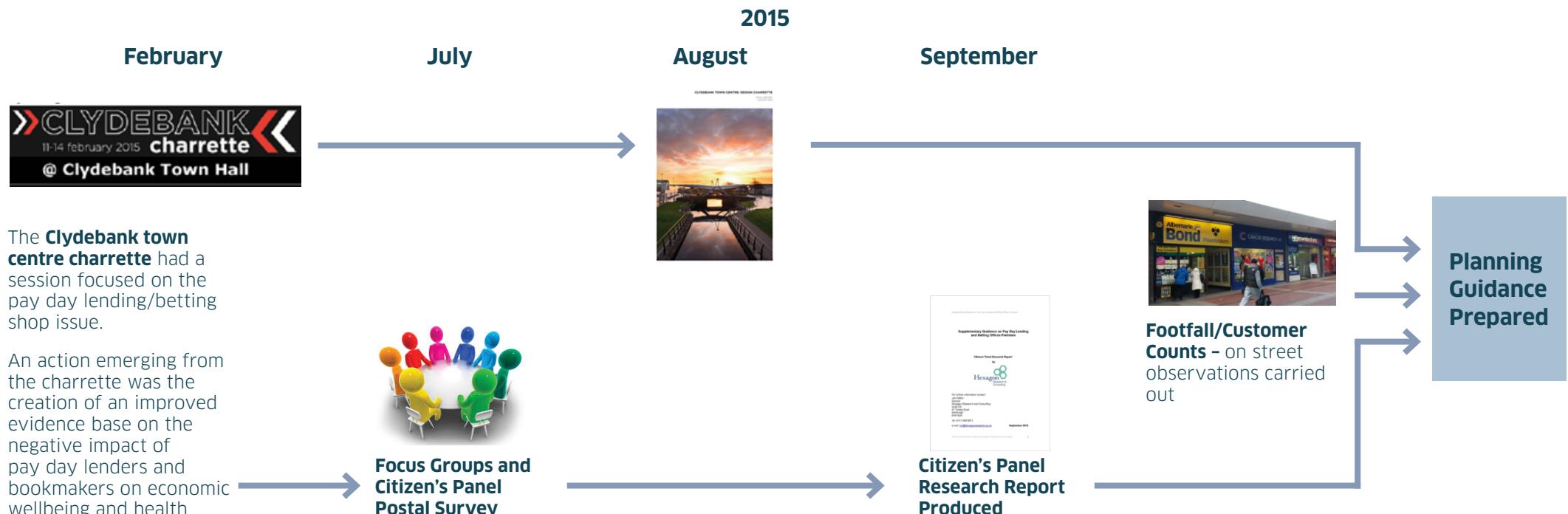
Limited consideration being given in appeal decisions to impact of clustering of such uses on long term vitality and viability of area.



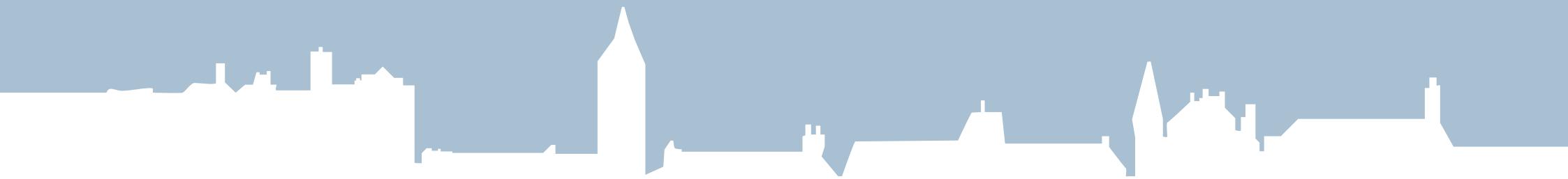
What was done...



1. **Scottish Planning Policy** identified the number and clustering of betting offices and high interest lending premises in town and local centres as a concern.
2. **Decision taken to prepare Planning Guidance** to better express strength of council position on this matter.
3. **Desktop and empirical research undertaken**, including analysis of recent appeal decisions, plotting town centre uses to highlight concentrations of PDLs, betting shops, and amusement arcades, footfall/customer counts and citizen surveys.
4. **Guidance developed** based upon Local Development Plan core retail area policy which seeks to manage change of use from retail.



What was done...



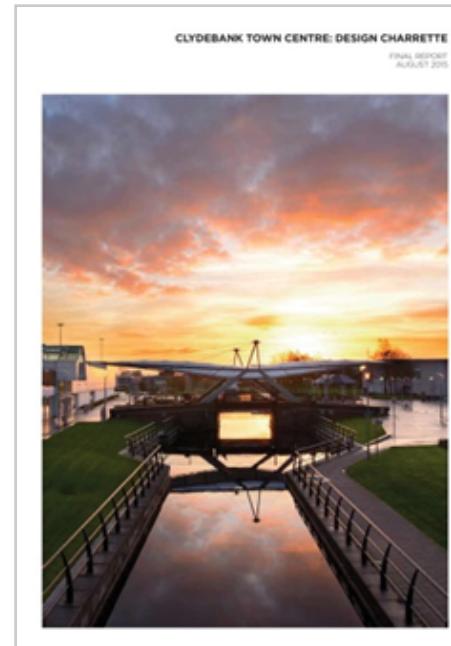
Clydebank charrette

The Clydebank town centre charrette had a session focused on the pay day lending/betting shop issue. The discussion had been arranged because of local concerns about the number and clustering of some non-retail uses, such as betting offices and high interest money lending premises in Clydebank town centre.

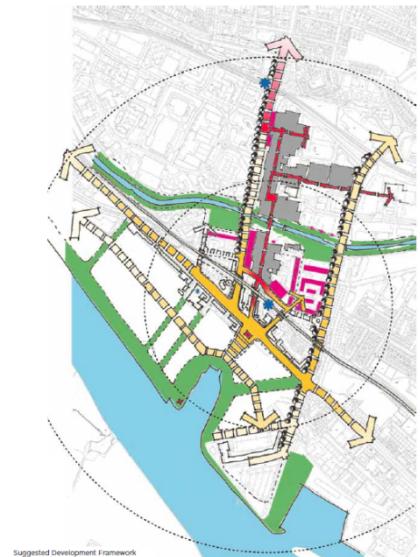
The main aim of the facilitated discussion was to scope out the initial approach that WDC could take.

An action emerging from the charrette was the creation of an improved evidence base on the negative impact of pay day lenders and bookmakers on economic wellbeing and health.

The charrette also provided an opportunity to develop a new vision and development framework for the town centre, including a broader mix of commercial and employment uses, leisure, civic, community services and residential, as opposed to clusters of pay day lending/betting shops. It also recommended more civic and community functions, events and festivals to build more community pride.



| Clydebank Town Centre: Design Charrette - West Dunbartonshire Council



What was done: Data gathering

Citizen's Panel Survey

To obtain the views of local people on the perceived impact of pay day lending and betting shop uses on the vitality and viability of centres and community wellbeing, Hexagon Research were commissioned. Through the Town Centre Planning Pilot Programme there was also an opportunity to seek input from Scottish Government research officials to look at how the consultation questions were framed to avoid leading questions and ensure the research was not perceived to be biased.

The research involved:

- two focus groups, one in Clydebank and one in Dumbarton, with seven to eight residents at each; and
- a postal survey of 1500 residents on the council's Citizen's Panel.

There was universal concern amongst the Citizen's Panel about the number and clustering of pay day lender and betting shop premises, both in terms of their impact on town centres and community wellbeing.

The surveys provided a rich resource of statistics and quotes of resident's views of their town centres, and how pay day lending and betting shop uses impact on them.

Supplementary Guidance on Pay Day Lending and Betting Offices Premises

Supplementary Guidance on Pay Day Lending and Betting Offices Premises

Citizens' Panel Research Report

by



For further information contact:

Jim Patton
Director
Hexagon Research and Consulting
Suite 401
47 Timber Bush
Edinburgh
EH6 6QH

Tel: 0131 669 9574

e-mail: jim@hexagonresearch.co.uk

September 2015

Citizen Panel Research Report by Hexagon Research and Consulting

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What was done... Data gathering

Citizen's Panel Survey

The Citizen's Panel results revealed major concerns about the number and clustering of pay day lenders and betting offices – there was universal concern about the number of pay day lenders and betting offices premises, and in particular, their clustering in some of the busiest parts of town centres where they had an unhealthy impact on community wellbeing.

'It would be a backward step to allow too many of these (pay day lenders and betting offices) to be located on the High Street. Even though it might reduce the number of empty premises, it would be detrimental to the well being of our town and the community.'

(Dumbarton respondent)

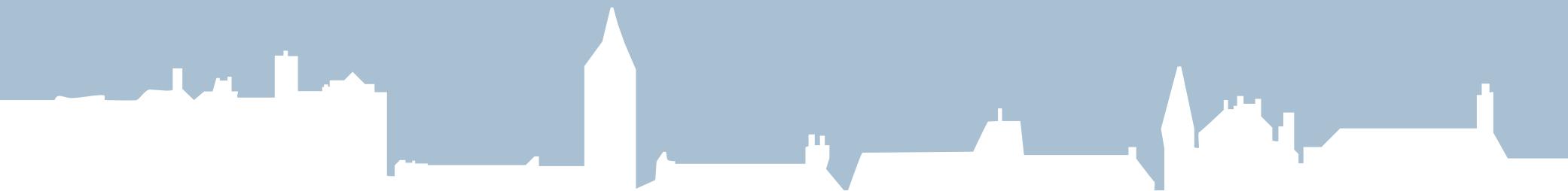
'The real problem is the proximity of bookies in one place. If there was one at either end of the shopping centre, I don't think people would complain. But having them concentrated near each other, and near pawn shops or pay day lenders, is going to create an environment that is very off putting to most people coming into the centre.'

(Clydebank respondent)

Significantly,

- 82% of survey respondents agreed that more pay day lenders and betting offices would be detrimental to their town centre's vitality and vibrancy.
- Only 4% stated that more pay day lenders and betting offices would improve the vitality and vibrancy of the town centre by increasing footfall.

What was done...



Footfall/Customer count

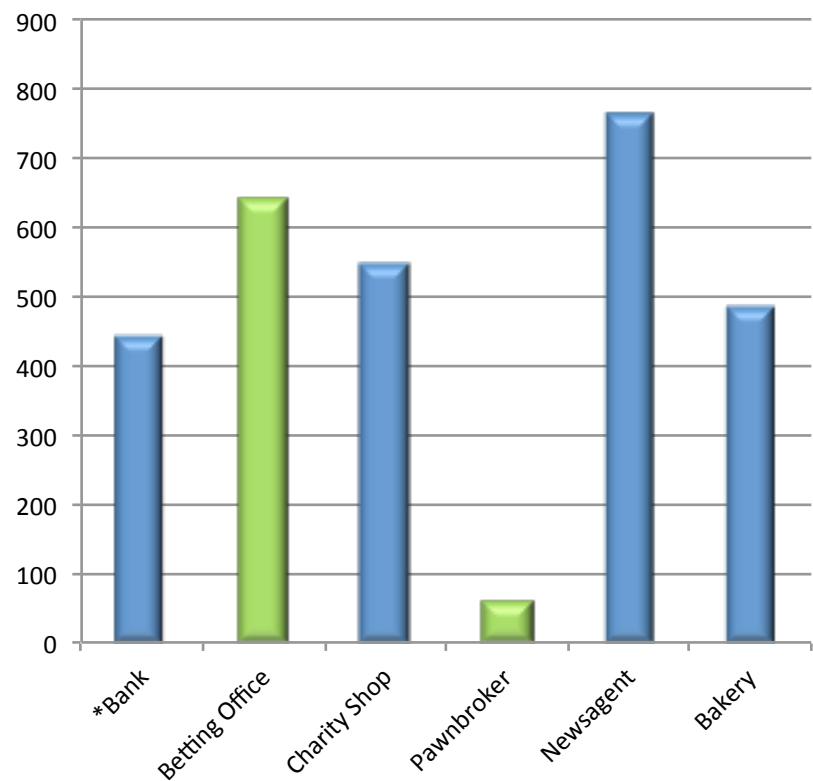
To obtain an indication of the contribution that pay day lending and betting shop uses make to vitality and viability a customer/footfall count was undertaken.

On a Thursday and Saturday in Clydebank and Dumbarton, counts were taken of the amount of customers visiting six different shop types during a 10-minute period every hour. Results were extrapolated to provide an hourly and daily customer count.

This allowed a comparison of the different amount of customers that different types of shops were attracting to the town centre.

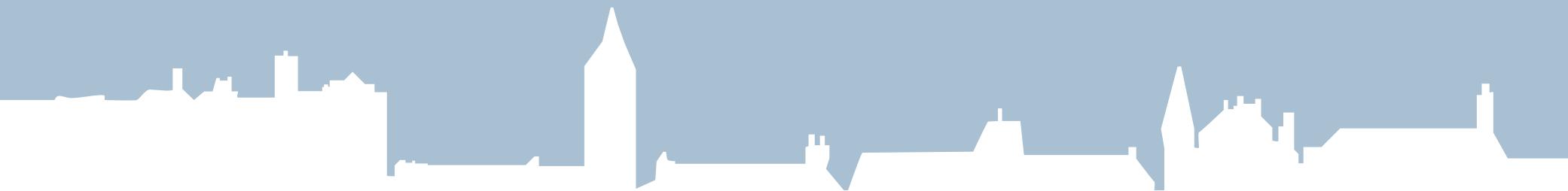
This provided evidence that pay day lending uses were not attracting a significant amount of customers to the town centre. Betting shops attracted a similar level of custom to other shops but did not generate much evening activity.

Footfall - Saturday between 9.30am & 5.30pm



*Bank closed during last two hours of count
(3.30pm - 5.30pm)

Research results and development of Planning Guidance



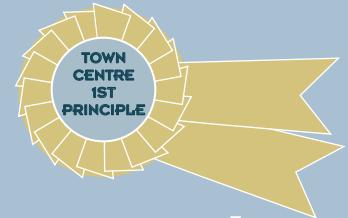
The results from Citizens Panel provided statistical evidence for the council to strengthen its stance on the impact of these uses on town centre vitality and community wellbeing.

Specifically, the evidence gathered supported the use of certain criterion in Policy SC2:

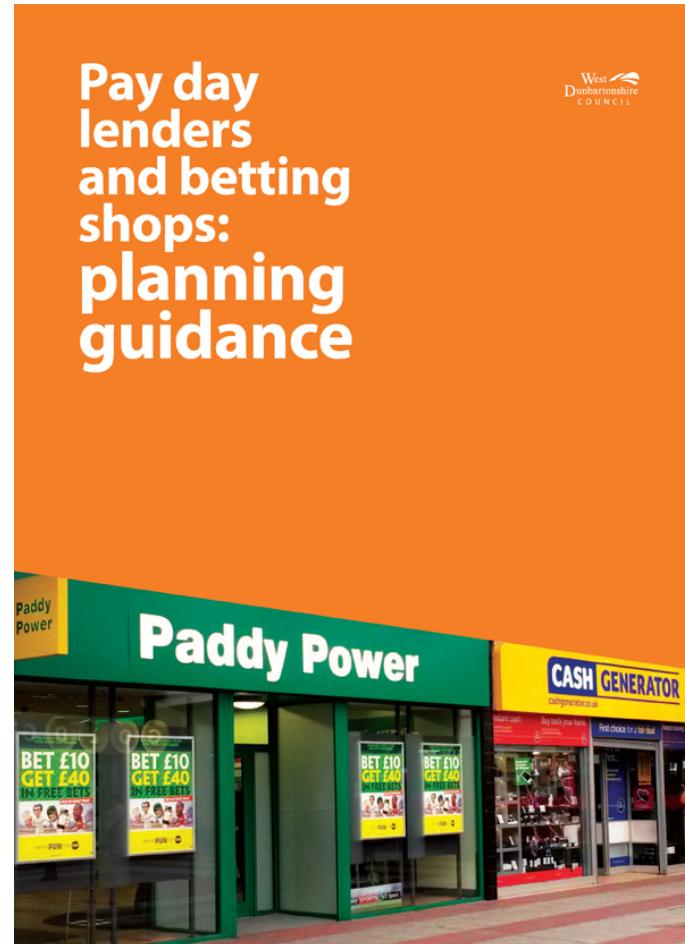
- the Citizens Panel results has provided evidence for the criterion relating to vitality and viability; and
- the customer counts has provided evidence for the criterion relating to footfall.



Achievements



- ★ The Guidance was warmly received by Planning Committee and unanimously approved.
- ★ The Guidance was published for consultation in May 2016.
- ★ The Guidance provides a robust evidence base for the assessment of future applications for pay day lending and betting shop uses.
- ★ The Guidance is understood to be the first in Scotland that focuses on pay day lending and betting shop uses.



Resources



Several collaborative meetings were held with Glasgow City Council, who were undertaking a similar project, and the Scottish Government and the Directorate for Planning and Environmental Appeals (DPEA).

Other meetings were held with local credit union and money advice service to gain their insight.

Citizens Panel questions undertaken by Hexagon Research were part of a wider corporate questionnaire the costs of which were covered corporately.

Citizens Panel focus groups, undertaken by Hexagon Research, cost £1800.

Footfall/customer counts were undertaken internally circa £500 salary costs.

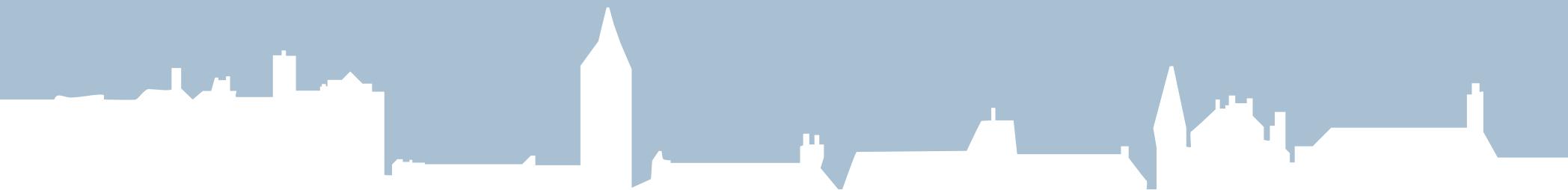
Guidance was prepared by the Forward Planning Team Leader at West Dunbartonshire Council.

Challenges

- Difficulty in establishing what would be valid evidence in planning terms to strengthen the council's position on this matter – carried out desk-based review of recent reports and settled on customer counts and local public opinion surveys.
- No experience of customer counts within planning team. Methodology had to researched and devised.
- Some wariness around the concept of focusing in on particular uses within a use class e.g. treating pay day lending and betting shops as different from other service uses.
- Some difficulty in finding the evidence that gambling/high-interest debt is a particular problem in West Dunbartonshire.
- Not confident of being able to extend the Guidance beyond the town centres covered by Policy SC2.



Key learning points



Use of Citizen's Panel – working with Hexagon Research and Scottish Government research officials to develop a valid questionnaire to provide the evidence required. This had to be devised in a ‘neutral’ way to ensure that respondents were not being led to answer a particular way. It also had to be devised in way to maximise response.

Customer Count – a resource efficient method was required to undertake this piece of work. The methodology involved the counting of customers (children with parents, staff and delivery people were excluded) visiting six different types of shops. Each shop was counted for a 10-minute period in an hour, with the exercise repeated through the opening hours of the premises. Each count was then multiplied by six to give an hour count, and then by the shop opening hours to give a daily count. The exercise was undertaken on one Thursday and one Saturday in each town centre in fair weather conditions. This provided us with an indication of the number of customers being drawn to a particular shop in comparison to other uses.

Place-based approach – the Guidance had to be based on the quality of ‘place’, not just an opposition to pay day lending and gambling uses. The Citizen’s Panel Survey, therefore had a focus on the impact that these uses have on the attractiveness of places (our town centres) and the locations of such uses were mapped to identify clustering, and therefore where the quality of place was being affected. The Clydebank charrette also focused on the area where clustering occurred investigating how it could be ‘lifted’ to make it more attractive to other uses.

For further information contact:
Alan Williamson
Team Leader-
Forward Planning, West Dunbartonshire Council
0141 951 7948
alan.williamson@west-dunbarton.gov.uk



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