

Town Centre Planning Pilots Programme



Glasgow

Pay day lending and betting shops
– collecting evidence case study

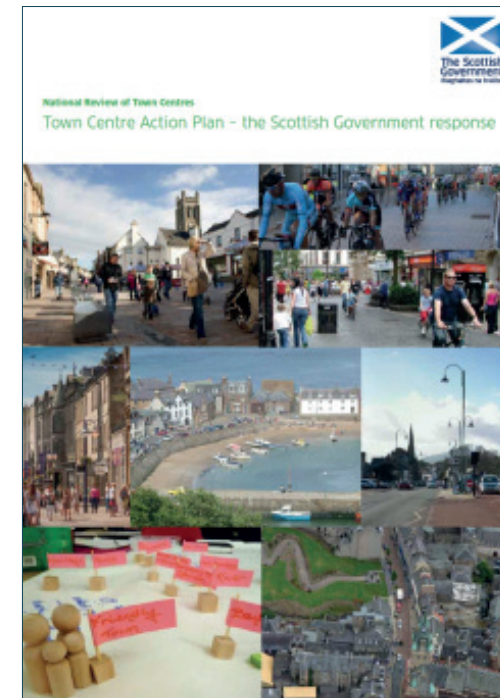


Town Centres Planning Pilots Programme

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 study includes an analysis of town centre data relating to pay day lenders and betting shops in Glasgow. A more detailed case study of Castlemilk town centre, where these uses appeared to be clustered, was also undertaken.



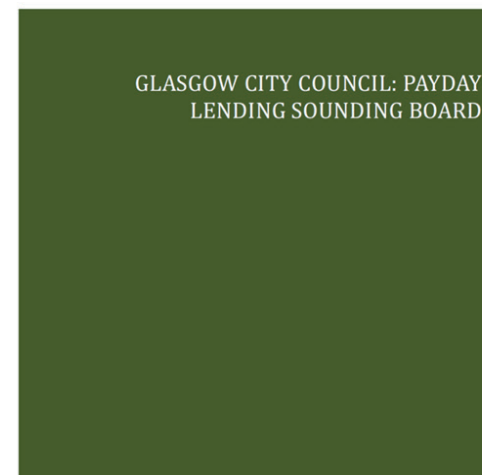
Project Details: The story behind it all...

The number of pay day lenders and betting shops in town centres has increased significantly in recent years. The increasing presence of these uses raised concerns on the effect they may be having on the centres themselves and on community wellbeing.

Glasgow City Council believes that these uses can be particularly detrimental to vulnerable communities where income inequality and addiction issues can be compounded, and where pay day loan and betting shops are conveniently located. It set up a Sounding Board on Pay day Lending in 2013 to consider the matter. Some of the recommendations of the Sounding Board related to the role of the planning system in regulating these uses in town centres.

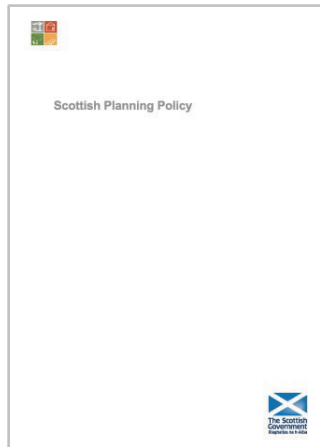
Scottish Planning Policy (2014) identified the clustering of pay day lenders and betting shops in town centres as potentially harmful to the centres, and to the communities that rely on them.

This pilot study sought to provide evidence to support use of the planning system to regulate these uses.



<http://www.glasgow.gov.uk/councillorsandcommittees/viewSelectedDocument.asp?c=P62AFQNTT181DX2U>

Policy links

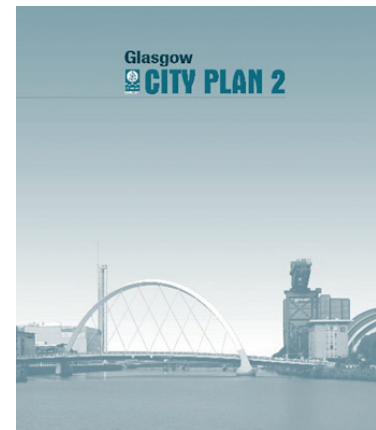


Scottish Planning Policy (2014) recognises there were concerns about the clustering of betting offices and high interest lending premises in local and town centres.

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.



Addressing the issue of clusters of pay day lenders and betting shops supports one of the five key priorities set out in the Council's Strategic Plan 2012-2017, which is 'a city that looks after its vulnerable people'.



The adopted development plan, City Plan 2's retail policy, encourages the maintenance of a retail threshold in all of Glasgow's town centres.

Consideration of the increase in pay day lenders and betting shops was consistent with this broad approach.



The emerging City Development Plan moves towards a policy approach that reflects more closely how the centre functions, and its direction of travel.

Baseline/Before

Glasgow has around 40 centres where town centre planning policy is applied, ranging in scale from the city centre, through major town centres with cross-boundary influence such as Pollok and Easterhouse to smaller centres providing a largely local role and function to surrounding communities. There was evidence of extensive coverage of pay day lenders and betting shops across the city, with some evidence that these uses are more heavily represented in smaller centres and those serving poorer communities.

Type of Centre	Class 1 (%)	Non Class 1 (%)	Vacancy (%)	Total Units (No.)	Pay day Lenders	Betting Shops
Large	51.8	35.9	12.3	1,982	9 (0.4%)	44 (2.2%)
Medium	58.7	32.3	9.0	681	5 (0.7%)	19 (2.8%)
Small	52.1	39.5	8.4	145	3 (2.1%)	9 (6.2%)
Totals	54.2	35.9	9.9	2,808	17 (0.6%)	72 (2.6%)

- ➔ The table shows the mix of uses, vacancy levels and the presence of pay day lenders and betting shops in different types of centres.
- ➔ More detailed survey material on individual centres and SIMD data is shown in the full study which can be found on the Glasgow City Council website <https://www.glasgow.gov.uk/index.aspx?articleid=19573>.

What we did...

To gather evidence on these uses, the study comprised **3** elements:

1. Classifying and mapping spatial distribution of PDLs and betting shops

An analysis of available information on local town centres, including:

- the presence of pay day lenders, betting shops, and recent trends;
- mix of uses and vacancies;
- multiple deprivation in nearby communities; and
- examination of whether there was any relationship between the presence of these uses and other indicators of struggling centres.

2. Finding out what communities and stakeholders think

Engaging with:

- Community Councils;
 - development management officers; and
 - town centre stakeholders
- to gain an understanding of their perspective on the issues.

3. Site visits and observations

- Site visits to selected centres: Victoria Road, Duke Street, Bridgeton and Castlemilk to get an impression of how these uses might be impacting on the centre's function.
- Analysis through visits and mapping, whether the presence of these uses was having a negative effect on the operation of the centre, e.g. leading to vacancy or lack of investment in part of a centre.
- An in depth case study of Castlemilk, where the presence of betting shops was evident, and where other issues were apparent.

More information on each of these elements is on the following pages

What was done...

1. Classifying and mapping spatial distribution of PDLs and betting shops

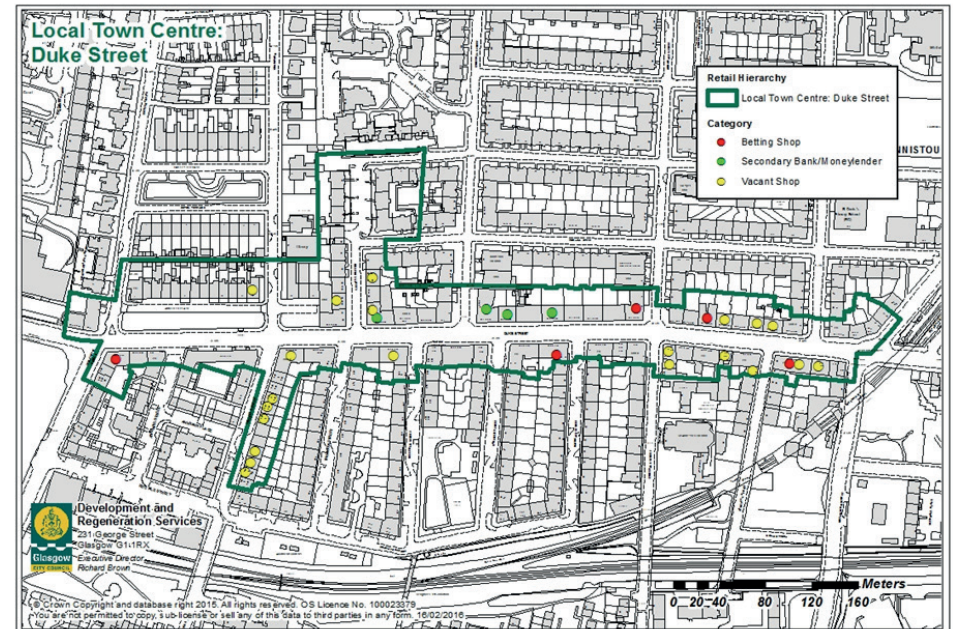
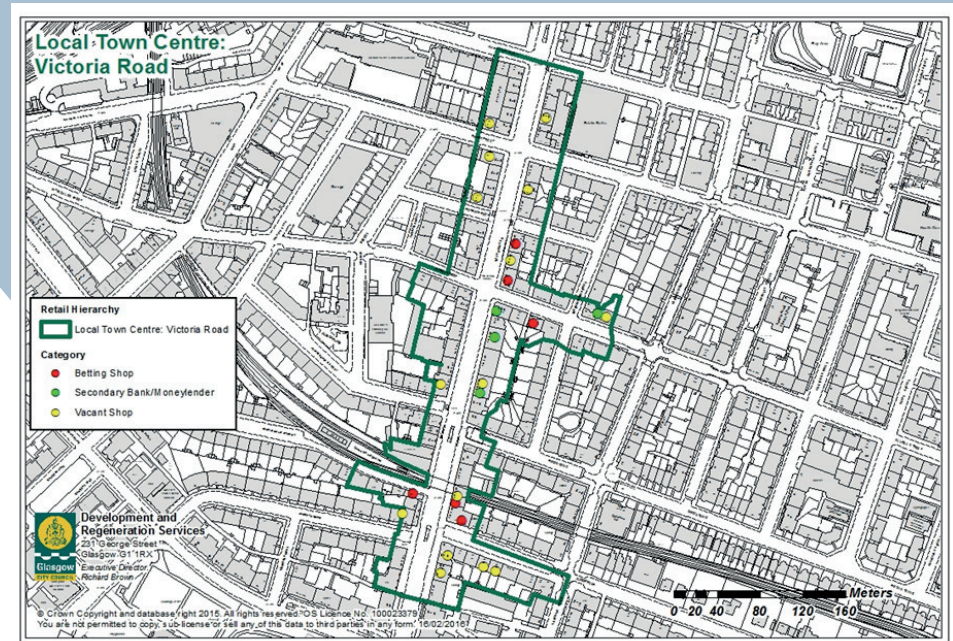
The city's town centres are monitored regularly to assess changes in the balance of uses, and vacancy levels. This is supportive of City Plan policy, which aims to achieve a level of 70% retail within centres, and 80% in the Principal Retail Areas of centres where retail is particularly concentrated.

The data was analysed in order to assess how each centre had changed over time in terms of the balance of uses, vacancy levels, and to identify the presence of pay day lenders and betting shops.

Those centres which serve communities in the lowest 5% of the Scottish Index of Multiple Deprivation were also identified.

This data provided the opportunity to:

- ➔ identify centres where these uses were present in relatively high numbers;
- ➔ establish whether particular types of centre, or particular communities, were more of a focus for these uses; and
- ➔ assess the balance between pay day lender and betting shops in order to identify whether one was more problematic than the other.



What we did: Finding out what people think...

2. Finding out what communities and stakeholders think

The council sought the views of planning officers, communities and businesses on the impact of these uses on centres and wider communities. The following actions were undertaken:

- ➔ circulated a questionnaire to Development Management officers inviting them to share their views on where there are issues with pay day lenders and betting shops, and what practical policy measures and processes could potentially be developed to counter them;
- ➔ carried out a sample consultation with the Shawlands Business Association, to help inform the Council's findings. The Council benefited from an long standing relationship with the Association through the Shawlands Town Centre Action Plan;
- ➔ worked closely with West Dunbartonshire Council to share experience of betting shops and pay day lenders and to reflect this in its recommendations; and
- ➔ consulted with Community Councils to garner their views on the impact of these uses on town centres and the wellbeing of communities.

What people said...

There were a range of views on this issue.

Town centre representatives recognised the potential social consequences of such businesses, but acknowledged that town centres often have to balance the interests of competing services to maintain the vitality and viability of the centre.

From the local authority perspective, development management officers agreed that these uses could contribute to a negative impression in a centre through, for example, dead frontages. Officers were also cautious of the potential impact that restriction could have on other uses and centre footfall.

'Betting shops and pay day lenders should be kept to a minimum within the Shawlands Town Centre Action Plan area.'

(Shawlands Business Association)

'Town centres need to up their game in terms of the quality of businesses on offer. Betting shops and pay day lenders do not create a positive impression.'

(Shawlands Business Association)

'...very difficult balancing act so as not to alienate some sections of the customer base and community to the benefit of others...'

(Shawlands Business Association)

'...when combined with other unsuitable uses, the impression that is created is overwhelmingly negative...'

(GCC Development Management)

What we did... Finding out what people think through a survey of Community Councils



Questionnaires were circulated to all of the 81 active Community Councils within Glasgow City. The survey was designed to obtain the views of respondents on town centres and their relationship with betting shops and pay day lenders. The questionnaires were, apart from some very minor amendments, the same as those used by West Dunbartonshire Council (also participating in a similar pilot) in their Citizens Panel Survey on this issue.

Whilst there was a reasonable response to the survey, with 10 of the 81 Community Councils having responded, and these responses covered 10 of the city's 40 designated town centres, the response fell significantly short of providing a full coverage of the city's Community Councils and town centres. Furthermore, many Community Councils in deprived areas, where there are apparent issues with the clustering of bookmakers and pay day lenders, did not respond.

Nonetheless, the survey did provide an insight into the views of local communities on the relationship between bookmakers/pay day lenders and both the health of town centres, and the wellbeing of local communities. Strong trends were apparent in the responses, and there were clear similarities between the findings of this survey and that conducted by West Dunbartonshire Council.

- ➔ The perception of bookmakers and pay day lenders among respondents was broadly negative.
- ➔ Community Councils generally viewed these uses negatively, both in terms of their impact on the vitality and viability of town centres and their social and economic impact on the health and wellbeing of communities.
- ➔ However, there were a number of respondents who viewed these uses less negatively, and one that was particularly positive about the contribution of bookmakers and pay day lenders to town centres.
- ➔ There was generally strong support for the implementation of a policy restricting further development of these uses in town centres.
- ➔ There was also generally strong support for the prospect of the Council restricting the further development of these uses through planning policy.

3. Site visits and observations

Castlemilk Case Study

Castlemilk was identified for a more detailed assessment, due to:

- an apparent clustering of betting shops;
- reasonably high vacancy levels; and
- a surrounding community that was multiply deprived.

The site visit revealed that the centre had deep seated issues of lack of demand and under-investment.



Image 10: Castlemilk town centre edge – poor quality units and environment

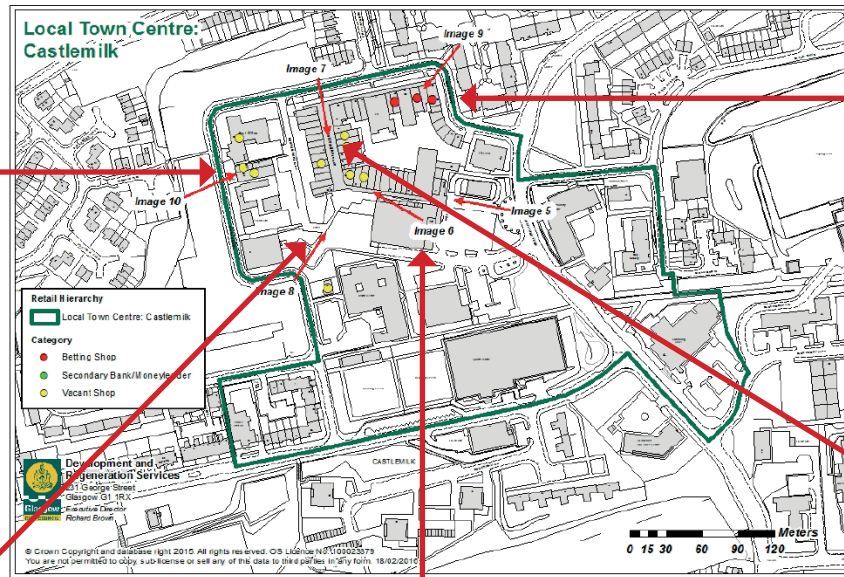


Image 9: Betting shop cluster



Image 8: Castlemilk town centre – poor connectivity



Image 6: Braes Shopping Centre – exterior arcade

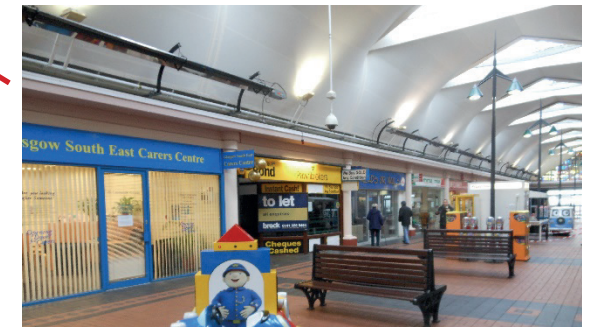


Image 7: Braes Shopping Centre – interior arcade, vacant unit

What we found

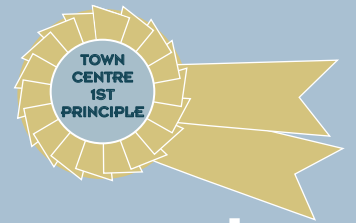


Findings

- ➔ City Plan aspiration to maintain retail in local centres is not being achieved consistently.
- ➔ Non-retail uses provide opportunities for pay day lenders and betting shops to locate in town centres without planning permission.
- ➔ Betting shops are more numerous than pay day lenders (around 4 to 1) but are not a particularly high proportion of the total units.
- ➔ Vacancy is significant in many centres, but is not closely linked to presence of pay day lenders and betting shops.
- ➔ These uses locate in areas with higher levels of poverty, more prosperous areas have few or none.
- ➔ Evidence that most local communities were not supportive of these uses in town centres.


Challenges/Key learning points

Challenges	Key Learning Points
<p>The council relied on internal resources to undertake the study. This presented challenges in terms of fitting time in alongside other work programme commitments.</p>	<p>Invest time to understand the impacts</p> <p>Benefits of having a clear understanding of the issues. Planning authorities should carefully reflect on initial assumptions about the effect that these types of uses have on town centre function.</p>
<p>As the study progressed, it became apparent that the large number of centres with town centre designation in Glasgow meant that certain centres would need to be prioritised.</p>	<p>Focus effort</p> <p>In hindsight, it would have been more useful to visit and focus on selected centres earlier in the study, rather than an in depth analysis of the town centre survey data.</p>
<p>It was also evident that understanding how centres function would not be straightforward, and that planning guidance on its own might not be the most appropriate approach. This became clearer when selected centres were visited.</p>	<p>Take a holistic place-based approach</p> <p>The premise that the issue of pay day lenders and betting shops in town centres could be addressed by specific planning guidance was tested. The council concluded that a more rounded approach to addressing wider issues of town centre decline, including physical change and encouraging a wider mix of uses, would be more appropriate.</p> <p>Rather than following the route of topic-based Supplementary Guidance focused solely on pay day lenders and betting shops, the council concluded that a place-based approach, addressing wider issues of town centre decline, including physical change and encouraging a wider mix of uses, would be more rounded and appropriate.</p>



- ★ Gathered evidence that most local communities were not supportive of these uses in town centres. Development Management officers and business representatives recognised the complex arguments surrounding pay day lenders and betting shops in town centres.
- ★ The study demonstrated that the issue of pay day lenders and betting shops in town centres was complex, and was often linked to deeper issues of loss of retail function or responding to existing vacancy.
- ★ The main benefit of undertaking this pilot study has been to give the council the opportunity to consider more carefully the issues affecting its town centres, and to develop a policy approach which is more appropriate to individual centres.
- ★ The study gave the council the opportunity to consider a more flexible proactive approach towards town centre policy. Supplementary Guidance will be better informed as a result, and policy will be particularly focused on:
 - addressing long term vacancy in centres;
 - reconsidering the retail threshold approach set out in City Plan 2 for local centres;
 - considering whether a broader mix of uses would be more consistent with a Town Centre First approach; and
 - encourage uses (including temporary uses) that contribute positively to the physical and environmental improvement of the centre.

Resources

- 
- ➔ The study was led by the Development Plan and Planning Neighbourhoods teams in Development and Regeneration Services, mainly:
Nicolas Lopez – Planner, Development Plan
David Dunlop – Planner, Planning Neighbourhoods
Sam Taylor – Principal, Development Plan
 - ➔ Views were also sought from development management officers. The council also engaged with one of the city’s town centre representatives and all Community Councils in the city.
 - ➔ The study was funded by a grant of £6,000 from the Scottish Government Town Centre Pilots Programme. The council’s contribution was made through officer time. Thanks are extended to Susan Stirling and Kristen Anderson from the Scottish Government Planning and Architecture Division for their support during this study.

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This publication is available at www.gov.scot

Any enquiries regarding this publication should be sent to us at
The Scottish Government
St Andrew's House
Edinburgh
EH1 3DG

ISBN: 978-1-78652-275-7

Published by The Scottish Government, June 2016

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA
PPDAS72379 (07/16)

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