

# Town Centre Planning Pilots Programme



## Payday lending and betting shops - collecting evidence case study



## **1 SUMMARY OF PROJECT**

- 1.1 To consider whether there was evidence of the clustering of uses such as payday lenders and betting shops, and to assess whether this was having a detrimental effect on the vitality and viability of town centres or the well-being of communities.

## **2 PROJECT DETAILS**

- 2.1 The Scottish Government considers that the location of premises for payday lenders and betting shops within town centres may be having a harmful effect on those centres, and on the well-being of the communities they serve. 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 payday loan and betting shops are conveniently located. The purpose of this study is to assess the role of the planning system in regulating these uses.
- 2.2 Glasgow has around 40 centres where town centre planning policy is applied, ranging in scale from the City Centre (Tier 1) the largest centre in the city-region, through major town centres with cross-boundary influence such as Pollok and Easterhouse (Tier 2), to smaller centres providing a largely local role and function to surrounding communities (Tier 3). In common with centres in other parts of Scotland, these centres face significant challenges from the changing Scottish retail environment, with issues of competition from other types of retailing, repositioning, income inequality and mobility. Given the scale of the City Centre and the Tier 2 centres, and the resources available, this study has been limited to Glasgow's Tier 3 town centres.
- 2.3 Those centres that serve communities ranked in the lowest 0-5% of the Scottish Index of Multiple Deprivation data zones have been identified in the analysis, in order to consider whether there is a relationship between levels of poverty and the presence of these uses. Academic and other research from elsewhere in the UK and experience of such uses in Scotland's town centres is also considered.
- 2.4 The report will also assess feedback from public and community stakeholders, and conclude by setting out the Council's proposed approach through the City Development Plan, Supplementary Guidance and potentially non-statutory Supplementary Planning Guidance.

## **3 BASELINE / BEFORE**

### **Glasgow City Council**

- 3.1 It is evident that payday lenders and betting shops have become a more common sight in town centres, raising concerns about the impact that they could be having on the financial well-being of communities. Glasgow City Council had already identified this issue in pursuit of its social inclusion objectives.
- 3.2 To consider this issue, Glasgow City Council set up a Sounding Board on Pay Day Lending in 2013, consisting of a range of stakeholders, including Councillors, payday lenders, book makers, advice services and credit unions.

The board was also informed by a leading independent authority on financial inclusion, Neil Alexander.

- 3.3 The Sounding Board concluded its findings in May 2013 by publishing a report. Among a variety of recommendations, the report proposed the following:-
- To investigate the prevalence of a correlation between gambling, particularly Fixed Odds Betting Terminals (FOBTs) and the co-location of gambling premises near payday loan outlets;
  - To reduce payday loan shop development on the high street; and
  - To reduce the ability of payday lenders to advertise via shop fronts.

### **Scottish Planning Policy / Government Legislation**

- 3.4 The Scottish Government sought to address this issue when publishing Scottish Planning Policy in June 2014. Paragraph 67 of Scottish Planning Policy states: “There are concerns about the number and clustering of some non-retail uses, such as betting shops and high interest money lending premises, in some town and local centres. Plans should include policies to support an appropriate mix of uses in town centres, local centres and high streets. Where a town centre strategy indicates that further provision of particular activities would undermine the character and amenity of centres or the well-being of communities, plans should include policies to prevent such over-provision and clustering.”
- 3.5 The Scottish Government also consulted on whether changes to the Use Classes Order would be an appropriate way of regulating these uses. The conclusion of this consultation was published in February 2015, in the report “Planning Controls, Pay Day Lending and Betting Offices – Analysis Report” which provided further authority guidance.

The principal recommendations of the Analysis Report were;-

- That Scottish Local authorities should continue to use existing planning mechanisms to address payday lenders and bookmaker concerns, and in particular Local Development Plan policies which guide local changes of use.
- That the Scottish Government should continue to reflect the issue in its wider policy framework and consider how these could address proliferation issues.
- Town Centre Pilots should be prepared by Glasgow City Council and West Dunbartonshire Council that would involve the public in the discussion and inform Supplementary Planning Guidance.

### **Academic and other Research on the Payday Lenders / Betting shops**

- 3.6 To further inform this study, an analysis of academic research was undertaken on the challenges that these uses present to the planning system.

The general conclusions of this research were that:

- The social problems associated with these uses are outwith the scope of the current legislation, and planning can only consider associated amenity

impacts;

- There is an issue regarding the time taken to formulate local development plan policies. As a result, this means that policies may be out of step with a specific problem of betting shops and pay day lenders in town centres;
- The planning system lacks the regulatory scope to address the changes required in considering planning applications;
- Whilst some suggest that payday lenders and betting shop uses have a negative impact on the viability and vitality of town centres, it is not the role of the planning system to make a moral judgement on behaviour or restrict competition;
- Whilst Article 4 directions and planning conditions may restrict such uses, the research suggests these are unlikely to be sufficient;
- Without changes to licensing, development will continue to be largely subject to market forces;
- A key barrier to better control is that planning, licensing, business rates and regulation of gambling is split between devolved and reserved matters; and
- Decisions for or against payday lenders / betting shops will need to balance the detrimental impacts of such uses against the additional footfall generated when compared to a vacant retail unit.
- There is no requirement for retrospective permission for existing betting shops and pay-day lenders – planning cannot, therefore, regulate existing clusters of these uses.

#### **4 WHAT WAS DONE / CHALLENGES**

- 4.1 The study was led by the Development Plan and Planning Neighbourhoods teams in Glasgow City Council, with input from Development Management colleagues, Shawlands Business Association and various Community Councils across the City.
- 4.2 In trying to address this issue, the large number of centres with a town centre designation in the City Plan presented a considerable challenge. It was necessary, therefore, to focus on the Tier 3 local centres.
- 4.3 In the main, Glasgow's town centres are based on a traditional street pattern, with commercial uses at ground floor level and tenement flats on upper floors. Some centres that have been developed more recently are in the form of purpose-built arcades.
- 4.4 The broad approach to this study can be summarised as follows:
  - i. Identify centres where these uses were present in relatively high numbers;
  - ii. Assess the balance between payday lender and betting shops in order to identify whether one was more problematic than the other;

- iii. Establish whether particular types of centre, or particular communities, were more of a focus for these uses;
  - iv. Engage with town centre stakeholders to gain an understanding of their perspective on the issue; and
  - v. Analyse, 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;
  - vi. Consider whether footfall information would be helpful in understanding which parts of the centre are more frequently visited.
- 4.5 It was considered that the large number of centres where these uses were present indicated that, initially, a broader analysis would be appropriate, followed by more in depth consideration of selected centres. This would differ from the approach taken in West Dunbartonshire, where the issue was broadly confined to specific locations within Clydebank and Dumbarton town centres.
- 4.6 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. This 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 payday lenders and betting shops. Those centres which serve communities in the lowest 5% of the Scottish Index of Multiple Deprivation were also identified.
- 4.7 Selected centres which showed higher vacancy levels or concentrations of payday lenders and betting shops were visited and mapped in order to consider whether particular spatial patterns were evident. Consideration was also given as to whether footfall surveys would indicate that the presence of these uses was affecting how the centre was used.
- 4.8 The Council also 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 payday 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 well-being of communities.

## Town Centre Surveys

- 4.9 The following table shows, for each centre (categorised by size) at 2014, a summary of the balance of uses and vacancies along with the number and percentage of payday lenders and betting shops in each centre. Centres in the lowest 5% of the Scottish Index of Multiple Deprivation are highlighted in order to assess whether there is a specific correlation between vacancy, bookmakers and pay-day-lenders (“BM/PDL”) and SIMD. A more detailed table, showing a RAG analysis of change between 2006 and 2014, is provided at Appendix 1.

**Table 1: August 2014 Town Centre Survey**

Centre	Class 1 (%)	Non Class 1 (%)	Vacancy (%)	Total Units (No.)	Payday Lenders (No.)	Betting Shops (No.)	SIMD lowest 5%
<b>Large Centres</b>							
Duke Street	50.8	37.6	11.7	197	3	5	Yes
Victoria Road	55.8	35.5	8.7	172	3	5	Yes
Cranstonhill/Yorkhill	46.5	46.5	7.0	172	0	0	
Shettleston	52.5	32.7	14.8	162	0	5	Yes
St George's Cross	66.7	25.2	8.2	159	1	3	
Cardonald/Halfway	51.7	39.9	8.4	143	1	7	
Govan	48.1	32.6	19.4	129	1	2	Yes
Govanhill	69.7	26.2	4.1	122	0	1	
Scotstoun/Whiteinch	50.5	40.2	9.3	97	0	2	Yes
Cathcart/Muirend	57.9	29.5	12.6	95	0	2	
Strathbungo	33.0	54.3	12.8	94	0	2	
Battlefield	58.2	30.8	11.0	91	0	1	
Bridgeton	37.4	31.9	30.8	91	0	2	Yes
Mount Florida	47.8	37.8	14.4	90	0	1	
Maryhill	51.7	37.9	10.3	87	0	4	Yes
Tollcross	46.9	35.8	17.3	81	0	2	Yes
<b>Total – Large Centres</b>				<b>1,982</b>	<b>9 (0.4%)</b>	<b>44 (2.2%)</b>	
<b>Medium Centres</b>							
Possilpark	57.0	29.1	13.9	79	0	3	Yes
Alexandra Parade	49.3	35.2	15.5	71	0	3	
Baillieston	53.6	43.5	2.9	69	1	3	
Cessnock	55.2	28.4	16.4	67	0	1	
Springburn	53.8	32.3	13.8	65	3	2	Yes
Anniesland	57.1	41.3	1.6	63	1	4	
Albert Drive	82.3	17.7	0.0	62	0	0	
Castlemilk	56.9	29.3	13.8	58	0	3	Yes
Woodlands	53.8	34.6	11.5	52	0	0	
Hyndland	69.4	28.6	2.0	49	0	0	
Kelvinbridge	57.1	35.7	7.1	46	0	0	
<b>Total – Medium Centres</b>				<b>681</b>	<b>5 (0.7%)</b>	<b>19 (2.8%)</b>	
<b>Small Centres</b>							
Yoker	46.9	34.4	18.8	32	1	1	
Drumchapel	53.6	32.1	14.3	28	0	2	Yes
Croftfoot	58.3	41.7	0.0	24	0	1	
Barrachnie	26.1	60.9	13.0	23	0	2	
Knightswood	59.1	36.4	4.5	22	2	3	
Gorbals	68.8	31.3	0.0	16	0	0	
<b>Total – Small Centres</b>				<b>145</b>	<b>3 (2.1%)</b>	<b>9 (6.2%)</b>	
<b>Totals</b>				<b>2,808</b>	<b>17 (0.6%)</b>	<b>72 (2.6%)</b>	

- 4.10 A number of broad conclusions can be drawn from this table:
- None of these centres meet the City Plan aspiration to maintain 70% Class 1 use, many are considerably lower than this figure;
  - Non-retail uses are significant in most centres, providing the opportunity for payday lenders and betting shops to occupy vacant Class 2 and Class 3 units without applying for planning permission.

- c. Payday lenders and betting shops do not represent a particularly high proportion of the total number of units in these centres (0.8% and 3.3% respectively);
  - d. Betting shops are more numerous than payday lending outlets across all centres, representing around 80% of the total units occupied by these uses. All centres have at least two betting shops, most have three or more, and they represent a greater proportion of the units in smaller centres than either medium sized or large centres. The data would tend to indicate that the main national bookmakers are generally represented in the identified centres, with the introduction of Fixed Odds Betting Terminals contributing to much of the recent growth;
  - e. Payday lenders, although less evident than betting shops, are more commonly found in the medium and large centres. The availability of online options may be a factor in the lack of growth compared to betting shops;
  - f. Large and medium sized centres have a greater representation of these uses than smaller centres;
  - g. Vacancy is an issue in most centres, and is significant in some, e.g. Bridgeton – 30.8%, Govan – 19.4%, Tollcross – 17.3%, Alexandra Parade – 15.5%. Class 1 units are affected more significantly by vacancy.
  - h. High levels of vacancy do not generally correspond with a higher presence of payday lenders and bookmakers. For example, Anniesland has the lowest vacancy level at 1.6%, but has one payday lender and four betting shops, among the highest in the centres surveyed. Bridgeton has a very high level of vacancy at 30.8%, but has no pay day lenders and two betting shops, which is well below average for the centres in the sample.
- 4.11 When the centres that serve communities within the lowest 5% SIMD are compared with non-SIMD centres (see Tables 2a and 2b below), there is a difference in the percentage of these uses, although not particularly significant.

**Table 2a: Town Centres – SIMD communities**

Centre	Class 1 (%)	Non Class 1 (%)	Vacancy (%)	Total Units (No.)	Payday Lenders (No.)	Betting Shops (No.)	SIMD lowest 5%
Duke Street	50.8	37.6	11.7	197	3	5	Yes
Victoria Road	55.8	35.5	8.7	172	3	5	Yes
Shettleston	52.5	32.7	14.8	162	0	5	Yes
Govan	48.1	32.6	19.4	129	1	2	Yes
Scotstoun/Whiteinch	50.5	40.2	9.3	97	0	2	Yes
Bridgeton	37.4	31.9	30.8	91	0	2	Yes
Maryhill	51.7	37.9	10.3	87	0	4	Yes
Tollcross	46.9	35.8	17.3	81	0	2	Yes
Possilpark	57.0	29.1	13.9	79	0	3	Yes
Springburn	53.8	32.3	13.8	65	3	2	Yes
Castlemilk	56.9	29.3	13.8	58	0	3	Yes
Drumchapel	53.6	32.1	14.3	28	0	2	Yes
<b>Totals - SIMD</b>				<b>1,246</b>	<b>10 (0.8%)</b>	<b>37 (3.0%)</b>	

**Table 2b – Non SIMD communities**

Centre	Class 1 (%)	Non Class 1 (%)	Vacancy (%)	Total Units (No.)	Payday Lenders (No.)	Betting Shops (No.)	SIMD lowest 5%
Cranstonhill	46.5	46.5	7.0	172	0	0	
St George's Cross	66.7	25.2	8.2	159	1	3	
Cardonald/Halfway	51.7	39.9	8.4	143	1	7	
Govanhill	69.7	26.2	4.1	122	0	1	
Cathcart/Muirend	57.9	29.5	12.6	95	0	2	
Strathbungo	33.0	54.3	12.8	94	0	2	
Battlefield	58.2	30.8	11.0	91	0	1	
Mount Florida	47.8	37.8	14.4	90	0	1	
Alexandra Parade	49.3	35.2	15.5	71	0	3	
Baillieston	53.6	43.5	2.9	69	1	3	
Cessnock	55.2	28.4	16.4	67	0	1	
Anniesland	57.1	41.3	1.6	63	1	4	
Albert Drive	82.3	17.7	0.0	62	0	0	
Woodlands	53.8	34.6	11.5	52	0	0	
Hyndland	69.4	28.6	2.0	49	0	0	
Kelvinbridge	64.4	33.3	2.2	45	0	0	
Yoker	46.9	34.4	18.8	32	1	1	
Croftfoot	58.3	41.7	0.0	24	0	1	
Barrachnie	26.1	60.9	13.0	23	0	2	
Knightswood	59.1	36.4	4.5	22	2	3	
Gorbals	68.8	31.3	0.0	16	0	0	
<b>Totals – Non SIMD</b>				<b>1,561</b>	<b>7 (0.4%)</b>	<b>35 (2.2%)</b>	

- 4.12 There are, however, 10 non SIMD centres with either one or fewer of these uses, mainly in more prosperous areas, which would tend to indicate that areas that experience poverty are more likely to have more of these uses present.
- 4.13 A smaller number of centres was selected on the basis of: (a) the high number of these uses, (b) evidence of potential clustering, or (c) where vacancy was particularly high. Further analysis of these centres indicates that these uses (particularly betting shops) have been present for some time, as Table 3 shows:

**Table 3: Payday Lenders /Betting Shops – Change 2008 - 2014**

Centre	2007		2010		2012		2014	
	PDL	BS	PDL	BS	PDL	BS	PDL	BS
<b>Victoria Road</b>	4	3	5	4	4	6	4	6
<b>Castlemilk</b>	1	3	1	3	2	3	1	3
<b>Bridgeton</b>	0	2	0	2	0	2	0	2
<b>Duke Street</b>	1	5	2	5	3	5	3	5
<b>Total</b>	<b>6</b>	<b>13</b>	<b>8</b>	<b>14</b>	<b>9</b>	<b>16</b>	<b>8</b>	<b>16</b>

- 4.14 Table 3 also shows that the number of betting shops has steadily increased over this period, while payday lenders increased until 2012, after which there was a slight decline. This may indicate some consolidation in the payday lending market.
- 4.15 Between August 2014 and January 2016, the Council received six planning applications for these uses across the Tier 3 centres, five for betting shops and one for a payday lender. With the exception of Woodlands town centre,



which had one proposal, the remaining four applications were in Bridgeton, Shettleston, Govan, Baillieston and Victoria Road, where vacant units were being taken up and these uses were already present in significant number. This pattern is consistent with the overall distribution across Tier 3 centres, with betting shops more prevalent.

### **Case Studies - Spatial Distribution of Payday Lenders, Betting Shops and Vacancies**

- 4.16 The centres identified in Table 3: Victoria Road, Castlemilk, Bridgeton and Duke Street were visited in order to gain a more detailed impression of the centre, to understand the distribution of payday lenders and betting shops, and also to assess whether there were concentrations of vacancies adjacent to these uses. Shawlands was also visited, to observe the public realm improvements that were taking place through the Town Centre Action Plan.
- 4.17 The Council also considered whether footfall information would be useful to gain a better understanding of how people moved around each centre, and whether there were parts of the centre which were better used than others. However, it was clear that, given the size of some centres, the traditional street pattern, and consequently the complex patterns of pedestrian movement within them, the recording of footfall information would require a significant resource that was beyond the scope of this study.
- 4.18 Each centre is considered below, with the outcome of the site visits indicating that a more detailed commentary on Castlemilk would be appropriate.
- 4.19 There were noticeable similarities in **Victoria Road** and **Duke Street**, where, despite a relatively high presence of these uses, they were distributed throughout what are fairly large centres (see Appendix 1). Overall, the centres were relatively vibrant, with below average levels of vacancy. It was difficult to conclude, therefore, that there was any indication of impact on the perception or function of the centre.
- 4.20 In **Bridgeton**, the main issue related to the very high vacancy level, rather than a particular concentration of payday lender or betting shops. During the site visit it was noted that the number of betting shops had increased from two to three since the last survey in 2014, and that they were focused in a particular part of the centre (although on either side of London Road, the main road running through the centre). The overall impression of Bridgeton was relatively positive, however, due to recent significant investment in public realm and business units by Clyde Gateway and Commonwealth Games legacy projects (see Appendix 1). Vacancies had reduced, but remained the most significant issue for the centre.

Image 1: Bridgeton Town Centre – Public Realm Investment



Image 2: Bridgeton Town Centre – Red Tree Business Centre



Image 3: Bridgeton Town Centre – The Olympia Library and Business Centre



4.21 The Council is making significant investment in **Shawlands**, as part of the Town Centre Action Plan implementation. Shawlands is a good example of a centre whose retail function has diminished, and where a night time economy has developed. Improvements to the public realm, allied to the introduction of a weekend farmer's market at Langside Hall, illustrates the support that has been given to the centre.

Image 4: Shawlands Town Centre – Public Realm Improvements



- 4.22 The most interesting findings were in **Castlemilk**, which had been identified as having a cluster of betting shops in a particular part of the centre. The centre boundary extends beyond the commercial core to include community uses, but its main focus is the Braes Shopping Centre (see Appendix 1).
- 4.23 First impressions on approaching the Braes Shopping Centre from the car park were encouraging, with good quality occupiers, attractive frontages and no vacancies. Inside the Braes arcade area, the quality of occupier was significantly lower, and a poor standard of shop front and signage indicated a lack of investment. A number of units were vacant (including the withdrawal of the Money Shop, the only payday lender that had been present in the centre). The town centre seems quite disjointed, however, with poor connectivity, and some units quite divorced from the main centre.

Image 5: Braes Shopping Centre entrance



Image 6: Braes Shopping Centre – exterior arcade



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



Image 8: Castlemilk Town Centre – poor connectivity



4.24 The three betting shops are located at the back of the arcade area, and are open to the street facing the adjacent housing. The units themselves are of a good standard, the neighbouring units are all occupied (mainly by hot food uses where the opening hours would be compatible with the later hours now operated by betting shops). The overall impression is much more positive than the main arcade area.

Image 9: Castlemilk Town Centre – betting shop cluster



4.25 In the detached area of the centre, the quality of environment is extremely poor, with a particularly unwelcoming feel. The occupied units in this area are quite poor in appearance, and a number of units are vacant.

Image 10: Castlemilk Town Centre edge – poor quality units and environment



4.26 For Castlemilk, the fundamental problem seems to be one of low demand leading to lack of investment in the centre. The centre manager noted the difficulty of attracting good quality tenants, and made reference to the loss of



population in Castlemilk. This is borne out by Census data, which shows that, as a result of re-development of higher density flats with low-rise family housing, the population declined from around 37,000 in 1971 to around 14,000 in 2011. When considered alongside the changes to shopping and leisure habits that have been apparent in recent years, the challenges for the centre become clear.

- 4.27 Castlemilk has been the focus for regeneration for many years, with significant investment in the physical fabric and economic development. Mixed tenure housing initiatives by the Council, Glasgow Housing Association and local Housing Associations are bringing population back to Castlemilk, with the hope that the local community will be able to support a wider range of shops and services in the town centre.
- 4.28 In terms of the centre itself, the approach which would appear to be most appropriate for the centre is one that involves a more detailed health check, leading to physical intervention in co-operation with the owners.

## **Feedback from Consultees**

- 4.29 The views of a range of people with an interest in town centres were sought, in order to gain a wider appreciation of the issues that affect the success of centres, with a particular focus on betting shops and payday lenders. The key observations were as follows:-

### Development Management Planners (Appendix 3)

“Payday lender and betting shop uses have a moderate effect on the vitality and character of town centres. This is mainly due to the relatively static displays in windows and the general lack of vitality this creates. This issue is not unique, however, to this sector, and can include amusement arcades, banks, pawnbrokers, and hot food shops, which often also provide ‘dead frontage’ during the day”

“Any measures to restrict or ban such uses should consider the impact on other uses as well and the consequential loss of footfall”

“A review of the Use Classes Order is overdue and any should consider the impacts of different uses when grouping them into different classes”

“The impact of payday lenders and betting shops is only assessed with respect to the loss of retail function, if it is relevant to the planning application”

“Loss of retail function tends to most problematic in deprived areas”

“Land use planning has limited scope to tackle a perceived over-provision of such uses. However town centre health checks could highlight a need for more positive interventions to support retail function and general amenity of town centres”

“In the east end of Glasgow the problem is essentially one of over-provision”

“The percentage of the town centre retail floor space given over to betting shops and pay day lenders needs to be more strictly controlled”

“When combined with other unsuitable uses the impression that is created is overwhelmingly negative”

### Shawlands Business Association (Appendix 4)

- 4.30 The Association made the following points:

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

“Betting shops are already pulling out of town centres as on line gambling increases – emphasising the considerable social aspects of this issue”

“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”

“A very difficult balancing act is therefore required within the management of each town centre so as not to alienate some sections of the customer base and community to the benefit of others”

#### West Dunbartonshire Council Charrette on Clydebank

4.31 In February 2015 West Dunbartonshire Council held a charrette to examine the problem of book makers and pay day lenders in Clydebank. The general recommendations and conclusions from this were:-

- To consider introducing licensing in the same way as alcohol outlets, if suitable legislation could be secured by the Scottish Government.
- Under the guidance provided by SPP, to prevent over-provision and clustering.
- To maintain town centre character, amenity and community wellbeing by better defining local limits and evidence of harm.
- In recognising that landlords primary concern is to secure occupancy, rental and maintenance of their properties, to proactively work with them to secure high quality alternative tenants (for example community services that could contribute better to high street vibrancy.)
- To note that with problems of long term vacancy, prevention of BM/PDL could potentially make matters worse.
- To consider introducing time limited planning consents that could be renewed.
- To review the terms of Use Class 2 and separate book makers/pay day lenders from banks within the Planning legislation.
- For local authorities to be more assertive with vacant units until the community get the use class/user they want.
- Although class 3 change to class 2 is not common, to explore a more robust prevention position and restrict betting shops entering town centres by the ‘back door’.
- To strengthen the planning authorities evidence and statistical base to enable a ‘public health test’ to form a material consideration when determining such uses.

#### Community Councils (Appendix 5)

4.32 Questionnaires were circulated to all of the eighty-one 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 in their Citizens Panel Survey on this issue. This consistency allowed ease of comparison between the results of both surveys. A blank questionnaire is attached to this report as Appendix 5.

4.33 A total of 14 responses to the questionnaire were received. A number of the Community Councils sent a joint response reflecting the general views of members, whilst others, most notably Auchenshuggle Community Council, provided individual responses. The following Community Councils submitted at least one response to the questionnaire:

- Auchenshuggle
- Kings Park
- Claythorn
- Craigton
- Tollcross
- Dowanhill, Hyndland and Kelvinside
- Partick
- Whiteinch
- Broomhill

These responses related to the following local and town centres:

- Tollcross
- Parkhead
- Cardonald/Halfway
- Anniesland
- Drumchapel
- City Centre
- Shettleston
- Partick/Byres Road
- Hyndland
- Scotstoun/Whiteinch

4.34 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 well-being of local communities. Strong trends were also apparent in the responses, and there were clear similarities between the findings of this survey and that conducted by West Dunbartonshire Council. Thus, the perception of bookmakers and pay-day-lenders among respondents was broadly negative, and there was generally strong support for the implementation of a policy restricting further development of these uses in town centres. The detailed findings of the survey are summarised as follows:

4.35 Questions 1-3 were essentially introductory questions requiring respondents to identify which Community Council they were a member of, which centre they considered to be their "local town centre" and how often they visited this centre. Question 4 gauged the views of respondents on the importance of a vibrant town centre. All but two of the respondents considered a vibrant town

centre to be very important. The other two respondents considered a vibrant town centre to be quite important.

- 4.36 Question 5 asked respondents to rate different town centre land uses in terms of their contribution to the creation a vibrant town centre. Factors such as the range and quality of shops, as well as the provision of services such as banks, were generally cited as being important in this regard. This feedback supports Glasgow City Council's current approach to concentrating retail uses, as well as other important services and facilities, within town centres. Pay-day-lenders and bookmakers were, in contrast, not identified by any of the respondents as being very important to the creation of a vibrant town centre. Instead, twelve of the fourteen responses indicated that these uses were either not important at all, or not very important, to the creation of a vibrant town centre. This general view does, however, contrast with one respondent who identified betting offices as being important to the creation of a vibrant town centre.
- 4.37 This generally negative view of these uses was apparent in the responses to many of the other questions posed. Question 7, for example, asked respondents to consider a number of statements, both positive and negative, about pay-day-lenders and pawnbrokers and consider to what extent they agree or disagree with them. Ten responses disagreed or strongly disagreed with the statement "they are important because they help to fill vacant premises," suggesting they did not consider pay-day-lenders to make a positive contribution to the viability of town centres. Ten responses similarly either disagreed, or strongly disagreed, with the statement "they add to the vitality/vibrancy of the town centre." There was also concern among the majority of the respondents about the social impacts of pay-day lenders/pawnbrokers, with twelve responses strongly agreeing with the statement "they make it too easy for vulnerable people to get a loan."
- 4.38 The majority of the responses to question 8, which posed a series of statements in the same manner as question 7 but in relation to bookmakers rather than pay-day-lenders, were also negative about these uses both in relation to their impact on the vitality and viability of town centres, and the wellbeing of communities. Nine respondents disagreed, or strongly disagreed, with the statement "they are important because they help to fill vacant premises." One respondent did not complete this section of the survey, while the remaining four respondents either agreed or strongly agreed with this statement. This, again, suggests that most respondents do not consider that betting shops make a positive contribution to the viability of town centres. The same nine respondents also either agreed, or strongly agreed, with the statement "they are not good for the wellbeing of the community." This confirms that most respondents also considered that betting shops give rise to social or economic issues which have a negative impact on the wellbeing of communities.
- 4.39 Questions 9 and 10 gauged whether participants were concerned about the number and clustering of pay-day-lenders and bookmakers, and thereafter their views on what impact further examples of these uses would have on both the vitality and vibrancy of their local town centre, and the well-being of their local community. Nine of the fourteen respondents indicated that they were either quite concerned or very concerned with both the numbers of these uses and their clustering within particular parts of town centres. Three of the remaining respondents indicated that they were not very concerned,

whilst one stated that they were not concerned at all. The remaining respondent did not complete this part of the questionnaire. An even larger majority of participants viewed the addition of further instances of these uses to their local town centre negatively. Eleven respondents strongly agreed that further bookmakers/pay-day-lenders would have a detrimental effect on the vitality and vibrancy of the town centre. Similarly, twelve participants either disagreed or strongly disagreed that they would improve the vitality and vibrancy of their local town centre by increasing footfall. Ten respondents further agreed, or strongly agreed, that more pay-day-lenders or betting offices would be bad for the health and well-being of their community.

- 4.40 Questions 10 and 11 sought the views of participants on whether the Council should be able to restrict the number and clustering of betting offices and pay-day-lenders in town centres, and whether planning policy may be an appropriate means of doing so. Ten of the respondents strongly agreed that the Council should be able to restrict the number and clustering of pay-day-lenders, and the same ten respondents also strongly supported the use of planning policy as a means of doing so. Of the remaining four respondents, two both agreed that the Council should be able to restrict these uses and supported the use of planning policy in doing so. One respondent did not agree that the Council should be able to restrict these uses, identifying such an approach as constituting unnecessary bureaucracy. The remaining participant did not complete this section of the questionnaire.

## **5 DISCUSSION AND CONCLUSIONS**

### **The extent of the issue**

- 5.1 The increasing presence of payday lenders and betting shops in town centres has raised concerns, both at the local and national level, on the effect that they may be having on the centres themselves and on community well-being. This is demonstrated by the focus in Scottish Planning Policy and Glasgow City Council's Sounding Board on the role that planning authorities could have in addressing clusters in town centres.
- 5.2 From the analysis contained in this study, it is clear that there is extensive coverage of payday lenders and betting shops across the City, with some evidence that these uses are more heavily represented in centres serving poorer communities. For betting shops in particular, this presence is relatively long standing with national operators all represented. Only in more prosperous communities is there little presence of these uses. It may also be concluded that betting shops outnumber payday lender by around 4 to 1. This may reflect the fact that payday lenders are a relatively new form of business, whereas betting shops have been part of communities and town centres for many years. There is also some evidence that market consolidation has reduced the number of payday lenders in centres.

### **The role of the planning system**

- 5.3 While recognising that the main power to address the operation of these uses lies within regulatory frameworks other than the planning system, this study considers that the health and well-being of centres, and the communities they serve, can be influenced by the effective operation of planning policy. The long-standing presence of betting shops in town centres, and, more recently, the emergence of payday lenders appears to be a reflection of changing lifestyles and of a government response to these trends.
- 5.4 A key measure of town centre health is the level of vacancy, particularly if it is long-term. The evidence suggests that there is not a strong relationship between the presence of these uses and higher vacancy levels. Indeed, in most cases, betting shops and payday lenders, operating within the context of the current regulation framework, are more likely to locate in centres with lower demand and consequent vacancies. There is some planning application evidence which suggests that there is continuing demand for these uses to locate in Glasgow's town centres, often in vacant units.

### **Engaging with people interested in town centres**

- 5.5 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.
- 5.6 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.
- 5.7 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 also generally strong support for the prospect of the Council restricting the further development of these uses through planning policy.

### **Planning policy and guidance**

- 5.8 The direction of policy in Glasgow has been to maintain the level of retail presence, as this has typically been the foundation on which many successful town centres have been built. As shopping and leisure habits have evolved, however, it is acknowledged that a broader approach towards town centres has become more appropriate. The view from town centre interests would tend to suggest that the overall vibrancy of the centre is a key priority. In this context, policy in the new City Development Plan is moving towards maintaining a balance of uses, and ensuring that the presence of long-term vacancies does not lead to the introduction of uses that are not supportive of the centre's role and function.
- 5.9 The Council gave consideration to the preparation of non-statutory guidance which would restrict the growth of these uses in town centres. However,

while the support for such an approach amongst many of those surveyed was noted, analysis of data on these uses and visits to affected town centres have not provided any clear and robust evidence to suggest that bookmakers and pay-day-lenders are, above other uses or, indeed, the proliferation of vacancies apparent in many centres, having a negative impact on the health of town centres. Furthermore, whilst there has been some growth in the representation of bookmakers, in particular, within town centres, many are long established and most of the national bookmakers were present in the centres surveyed. This fact, coupled with apparent consolidation in the pay-day-lender market and the increasing importance of the internet and mobile applications as a format for gambling and pay-day-lending, suggests that guidance on this issue may be unnecessary.

- 5.10 The presence of vacant Class 2 and 3 units in many centres also provides opportunities, under current permitted development legislation, to open new bookmakers and pay-day-lenders without the benefit of planning permission. While it is acknowledged that these uses can often cause real harm to the wellbeing of communities, the limited applicability of planning guidance on this issue and the lack of robust evidence to link these uses with harm to the amenity, vitality and viability of centres suggests that the publication of supplementary guidance would not be appropriate at this time. Rather, it was more apparent that there was a need to tackle vacancy issues in town centres and promote a balance of uses that reflected the changing roles of our centres.

#### **Case Study: Castlemilk**

- 5.11 Castlemilk was the centre where a cluster of these uses was evident. Results from the site visit indicated that the centre suffers from low demand, vacancy and consequent lack of investment. It is apparent that the area where these uses have grouped is not showing the negative effects that may have been anticipated, particularly when compared to other parts of the town centre. Co-ordinated action in the centre would appear to be the most appropriate way of addressing the centre's decline in quality, the lack of connectivity, and the poor environmental quality, rather than guidance which is targeted towards particular uses.
- 5.12 It is also anticipated that wider regeneration initiatives, such as the introduction of more housing for sale and rent in Castlemilk, will support the centre more successfully, and encourage more investment.

## **6 POLICY LINKS**

- i. Glasgow City Plan 2
- ii. Glasgow City Development Plan – Proposed Plan  
<https://www.glasgow.gov.uk/index.aspx?articleid=16184>

## **7 RESOURCES**

- 7.1 The study was funded with a grant of £6,000 from a Scottish Government Programme - Town Centre Pilot: Sharing Good Practice. The Council relied on officers from within Development and Regeneration Services, and thanks are extended to the following officers who committed time to the study alongside their other responsibilities:



David Dunlop – Senior Planner, Planning Neighbourhoods  
Nick Lopez – Planner, Development Plan  
Sam Taylor – Principal, Development Plan

- 7.2 The pilot was supported by officers from the Scottish Government. The following officials provided extensive support and guidance, for which the Council is grateful:

Susan Stirling, Head of Placemaking and Housing, Planning and Architecture  
Kristen Anderson, Senior Planner, Planning and Architecture

## **8 ACHIEVEMENTS**

- 8.1 In the course of this study, the evidence gathered has indicated that compelling evidence for the preparation of Supplementary Planning Guidance specifically related to payday lenders and betting shops has been difficult to establish. 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.
- 8.2 Although it is recognised that retail activity is the main driver for many town centres, it is also acknowledged that a variety of uses are appropriate in town centre settings, and that a more holistic approach would be beneficial. As Supplementary Guidance in support of City Development Plan policy for the Network of Centres will be published for consultation in the coming months, detailed content cannot be made available at this time. However, this study has helped the Council to recognise that the role of town centres has changed significantly over time, and that vacancy levels are both an indicator of the market response to that change, and a potential risk to the centre's continuing health. As a consequence, development plan policy and guidance needs to be more flexible and positive, if renewed focus and investment in town centres is to be achieved. Policy will therefore be particularly focused on:
- a) Addressing long term vacancy in centres;
  - b) Re-considering the retail threshold approach set out in City Plan 2 for local centres;
  - c) Considering whether a broader mix of uses would be more consistent with a Town Centre First approach; and
  - d) Encourage uses (including temporary uses) that contribute positively to the physical and environmental improvement of the centre.

# Local Town Centre: Victoria Road

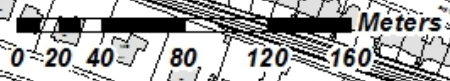
**Retail Hierarchy**

- Local Town Centre: Victoria Road

**Category**

- Betting Shop
- Secondary Bank/Moneylender
- Vacant Shop

 **Development and Regeneration Services**  
231 George Street  
Glasgow G1 1RX  
Executive Director  
Richard Brown



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# Local Town Centre: Duke Street

**Retail Hierarchy**

- Local Town Centre: Duke Street

**Category**

- Betting Shop
- Secondary Bank/Moneylender
- Vacant Shop

 **Development and  
Regeneration Services**  
231 George Street  
Glasgow G1 1RX  
Executive Director  
Richard Brown



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# Local Town Centre: Bridgeton

**Retail Hierarchy**

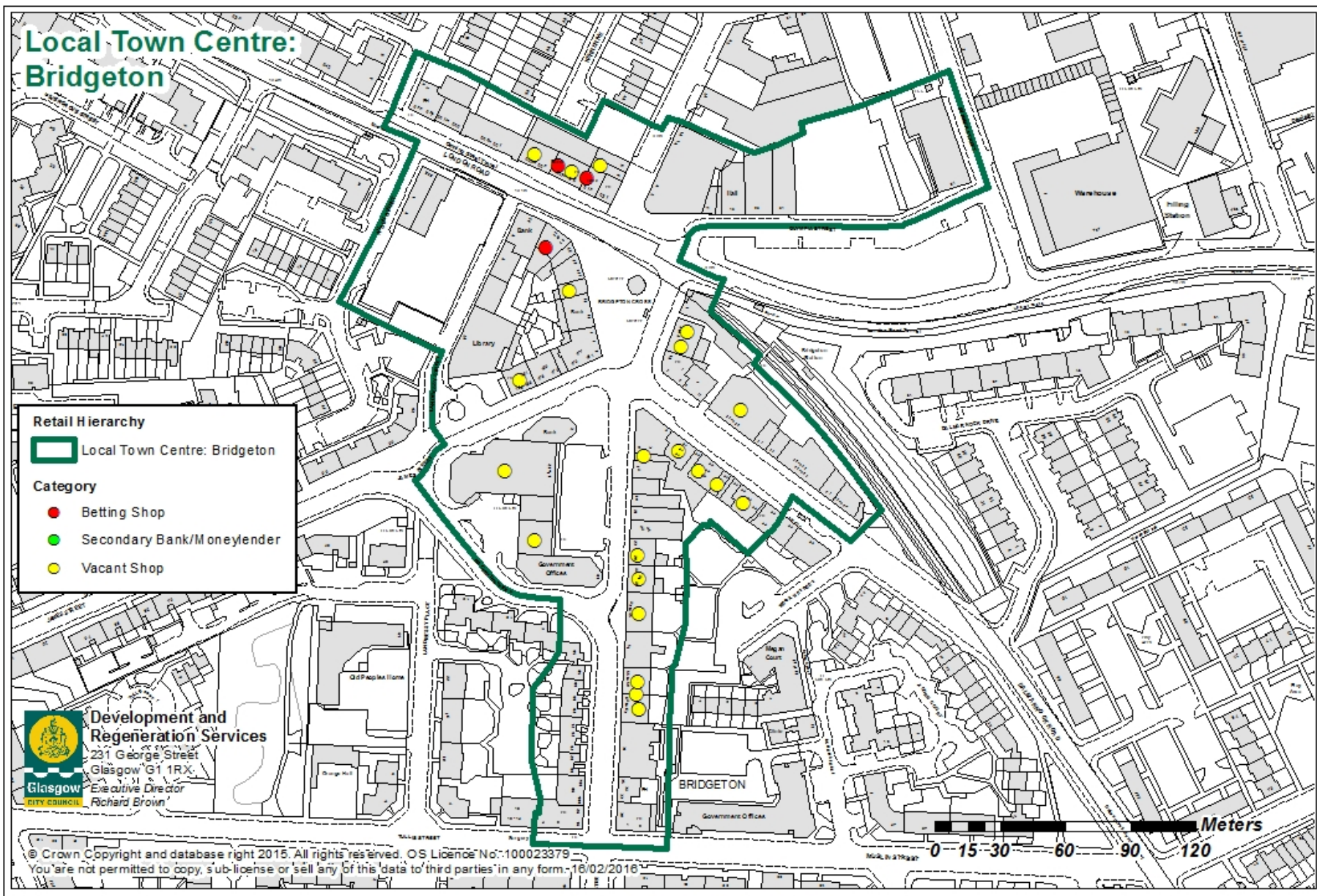
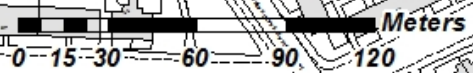
- Local Town Centre: Bridgeton

**Category**

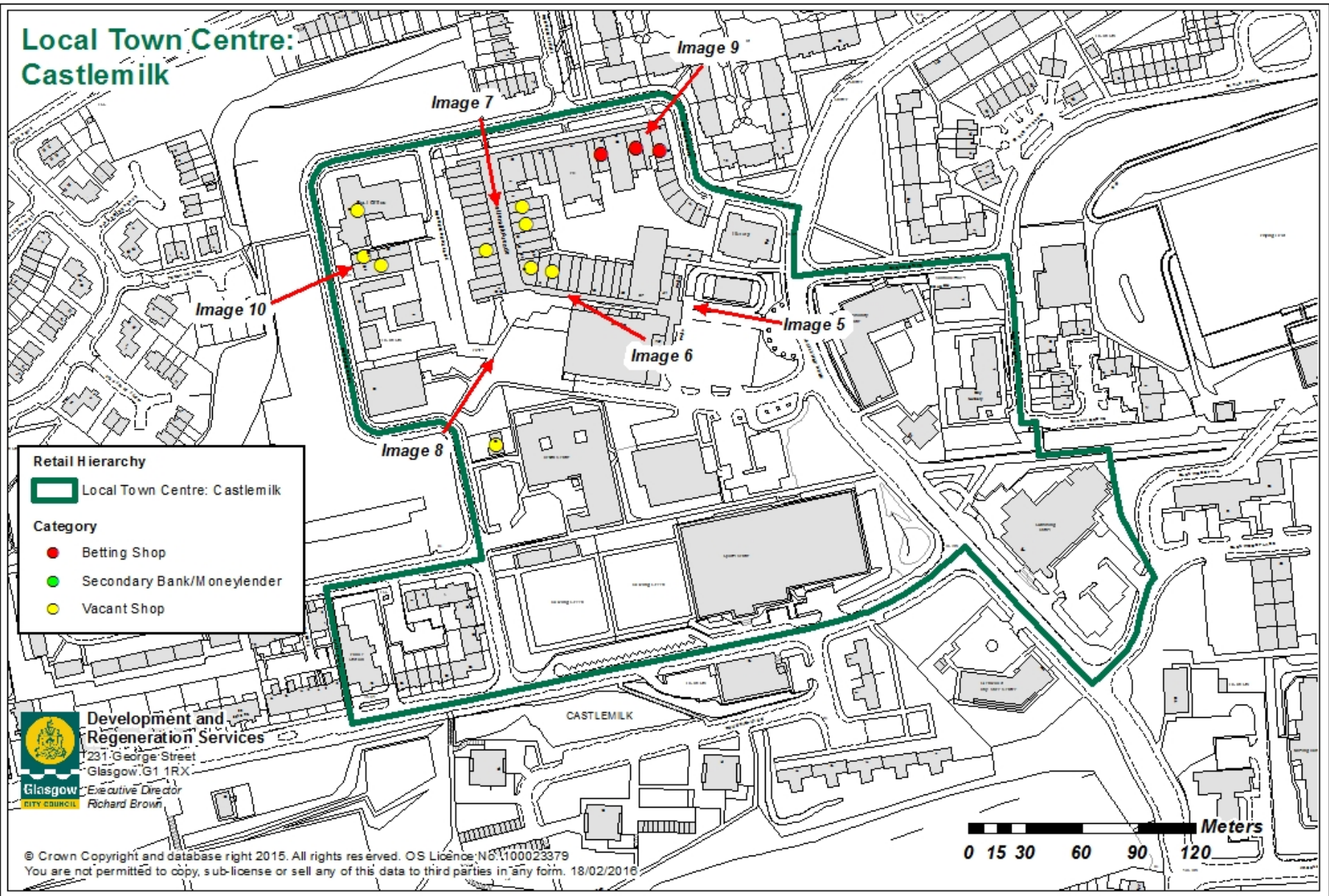
- Betting Shop
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# Local Town Centre: Castlemilk



## APPENDIX 1: TOWN CENTRE SURVEYS 2006 - 2014

Town Centre	Ground Floor Commercial Units							All Units
	Class 1			Non-Class 1			Vacant	
	Operational	Vacant	Total	Operational	Vacant	Total	Total	
<b>Large Centres</b>								
DUKE STREET - March 2008	84	33	117	69	17	86	50	203
	41.4%	16.3%	57.6%	34.0%	8.4%	42.4%	24.6%	
DUKE STREET - September 2012	95	22	117	68	12	80	34	197
	48.2%	11.2%	59.4%	34.5%	6.1%	40.6%	17.3%	
DUKE STREET - August 2014	100	16	116	74	7	81	23	197
	50.8%	8.1%	58.9%	37.6%	3.6%	41.1%	11.7%	
VICTORIA ROAD - September 2007	96	15	111	55	6	61	21	172
	55.8%	8.7%	64.5%	32.0%	3.5%	35.5%	12.2%	
VICTORIA ROAD - November 2013	96	9	105	64	3	67	12	172
	55.8%	5.2%	61.0%	37.2%	1.7%	39.0%	7.0%	
VICTORIA ROAD - August 2014	96	8	104	61	7	68	15	172
	55.8%	4.7%	60.5%	35.5%	4.1%	39.5%	8.7%	
CRANSTONHILL/YORKHILL - January 2008	76	22	98	73	4	77	26	175
	43.4%	12.6%	56.0%	41.7%	2.3%	44.0%	14.9%	
CRANSTONHILL/YORKHILL - May 2013	72	16	88	80	2	82	18	170
	42.4%	9.4%	51.8%	47.1%	1.2%	48.2%	10.6%	
CRANSTONHILL/YORKHILL - August 2014	80	9	89	80	3	83	12	172
	46.5%	5.2%	51.7%	46.5%	1.7%	48.3%	7.0%	
SHETTLESTON - March 2008	80	20	100	59	4	63	24	163
	49.1%	12.3%	61.3%	36.2%	2.5%	38.7%	14.7%	
SHETTLESTON - September 2012	86	17	103	57	3	60	20	163
	52.8%	10.4%	63.2%	35.0%	1.8%	36.8%	12.3%	
SHETTLESTON - August 2014	85	16	101	53	8	61	24	162
	52.5%	9.9%	62.3%	32.7%	4.9%	37.7%	14.8%	
ST GEORGES CROSS/ GREAT WESTERN ROAD - December 2007	95	20	115	46	1	47	21	162
	58.6%	12.3%	71.0%	28.4%	0.6%	29.0%	13.0%	
ST GEORGES CROSS/ GREAT WESTERN ROAD - November 2013	109	5	114	41	2	43	7	157
	69.4%	3.2%	72.6%	26.1%	1.3%	27.4%	4.5%	
ST GEORGES CROSS/ GREAT WESTERN ROAD - July 2014	106	8	114	40	5	45	13	159
	66.7%	5.0%	71.7%	25.2%	3.1%	28.3%	8.2%	
CARDONALD/HALFWAY - September 2007	77	9	86	55	2	57	11	143
	53.8%	6.3%	60.1%	38.5%	1.4%	39.9%	7.7%	
CARDONALD/HALFWAY - September 2012	80	7	87	54	1	55	8	142
	56.3%	4.9%	61.3%	38.0%	0.7%	38.7%	5.6%	
CARDONALD/HALFWAY - August 2014	74	11	85	57	1	58	12	143
	51.7%	7.7%	59.4%	39.9%	0.7%	40.6%	8.4%	

Town Centre	Ground Floor Commercial Units							
	Class 1			Non-Class 1			Vacant	
	Operational	Vacant	Total	Operational	Vacant	Total	Total	
<b>Large Centres</b>								
GOVAN - October 2007	45	48	93	33	6	39	54	132
	34.1%	36.4%	70.5%	25.0%	4.5%	29.5%	40.9%	
GOVAN - September 2012	61	21	82	40	5	45	26	127
	48.0%	16.5%	64.6%	31.5%	3.9%	35.4%	20.5%	
GOVAN - August 2014	62	19	81	42	6	48	25	129
	48.1%	14.7%	62.8%	32.6%	4.7%	37.2%	19.4%	
GOVANHILL - February 2008	76	13	89	30	5	35	18	124
	61.3%	10.5%	71.8%	24.2%	4.0%	28.2%	14.5%	
GOVANHILL - November 2013	83	7	90	30	1	31	8	121
	68.6%	5.8%	74.4%	24.8%	0.8%	25.6%	6.6%	
GOVANHILL - August 2014	85	4	89	32	1	33	5	122
	69.7%	3.3%	73.0%	26.2%	0.8%	27.0%	4.1%	
SCOTSTOUN/WHITEINCH - July 2006	43	16	59	41	2	43	18	102
	42.2%	15.7%	57.8%	40.2%	2.0%	42.2%	17.6%	
SCOTSTOUN/WHITEINCH - June 2013	50	8	58	37	2	39	10	97
	51.5%	8.2%	59.8%	38.1%	2.1%	40.2%	10.3%	
SCOTSTOUN/WHITEINCH - August 2014	49	7	56	39	2	41	9	97
	50.5%	7.2%	57.7%	40.2%	2.1%	42.3%	9.3%	
CATHCART/MUIREND - July 2007	63	6	69	29	4	33	10	102
	61.8%	5.9%	67.6%	28.4%	3.9%	32.4%	9.8%	
CATHCART/MUIREND - September 2012	59	4	63	30	2	32	6	95
	62.1%	4.2%	66.3%	31.6%	2.1%	33.7%	6.3%	
CATHCART/MUIREND - August 2014	55	7	62	28	5	33	12	95
	57.9%	7.4%	65.3%	29.5%	5.3%	34.7%	12.6%	
STRATHBUNGO - February 2008	28	19	47	51	4	55	23	102
	27.5%	18.6%	46.1%	50.0%	3.9%	53.9%	22.5%	
STRATHBUNGO - November 2013	33	3	36	51	6	57	9	93
	35.5%	3.2%	38.7%	54.8%	6.5%	61.3%	9.7%	
STRATHBUNGO - August 2014	31	3	34	51	9	60	12	94
	33.0%	3.2%	36.2%	54.3%	9.6%	63.8%	12.8%	
BATTLEFIELD - April 2007	45	2	47	40	7	47	9	94
	47.9%	2.1%	50.0%	42.6%	7.4%	50.0%	9.6%	
BATTLEFIELD - September 2012	49	5	54	31	6	37	11	91
	53.8%	5.5%	59.3%	34.1%	6.6%	40.7%	12.1%	
BATTLEFIELD - August 2014	53	4	57	28	6	34	10	91
	58.2%	4.4%	62.6%	30.8%	6.6%	37.4%	11.0%	

Town Centre	Ground Floor Commercial Units							
	Class 1			Non-Class 1			Vacant	
	Operational	Vacant	Total	Operational	Vacant	Total	Total	
<b>Large Centres</b>								
MOUNT FLORIDA - April 2008	48	7	55	34	5	39	12	94
	51.1%	7.4%	58.5%	36.2%	5.3%	41.5%	12.8%	
MOUNT FLORIDA - October 2012	46	7	53	35	2	37	9	90
	51.1%	7.8%	58.9%	38.9%	2.2%	41.1%	10.0%	
MOUNT FLORIDA - August 2014	43	10	53	34	3	37	13	90
	47.8%	11.1%	58.9%	37.8%	3.3%	41.1%	14.4%	
BRIDGETON - August 2006	33	30	63	28	4	32	34	95
	34.7%	31.6%	66.3%	29.5%	4.2%	33.7%	35.8%	
BRIDGETON - October 2012	31	21	52	30	7	37	28	89
	34.8%	23.6%	58.4%	33.7%	7.9%	41.6%	31.5%	
BRIDGETON - August 2014	34	22	56	29	6	35	28	91
	37.4%	24.2%	61.5%	31.9%	6.6%	38.5%	30.8%	
MARYHILL - January 2007	51	13	64	41	3	44	16	108
	47.2%	12.0%	59.3%	38.0%	2.8%	40.7%	14.8%	
MARYHILL - October 2012	44	7	51	34	1	35	8	86
	51.2%	8.1%	59.3%	39.5%	1.2%	40.7%	9.3%	
MARYHILL - August 2014	45	8	53	33	1	34	9	87
	51.7%	9.2%	60.9%	37.9%	1.1%	39.1%	10.3%	
TOLLCROSS - June 2006	42	3	45	41	2	43	5	88
	47.7%	3.4%	51.1%	46.6%	2.3%	48.9%	5.7%	
TOLLCROSS - September 2012	38	8	46	29	6	35	14	81
	46.9%	9.9%	56.8%	35.8%	7.4%	43.2%	17.3%	
TOLLCROSS - August 2014	38	8	46	29	6	35	14	81
	46.9%	9.9%	56.8%	35.8%	7.4%	43.2%	17.3%	



Town Centre	Ground Floor Commercial Units							
	Class 1			Non-Class 1			Vacant	
	Operational	Vacant	Total	Operational	Vacant	Total	Total	
<b>Medium Centres</b>								
POSSILPARK - February 2007	43	8	51	24	4	28	12	79
	54.4%	10.1%	64.6%	30.4%	5.1%	35.4%	15.2%	
POSSILPARK - September 2012	43	6	49	23	4	27	10	76
	56.6%	7.9%	64.5%	30.3%	5.3%	35.5%	13.2%	
POSSILPARK - August 2014	45	7	52	23	4	27	11	79
	57.0%	8.9%	65.8%	29.1%	5.1%	34.2%	13.9%	
ALEXANDRA PARADE - August 2006	33	13	46	25	4	29	17	75
	44.0%	17.3%	61.3%	33.3%	5.3%	38.7%	22.7%	
ALEXANDRA PARADE - September 2012	33	13	46	23	2	25	15	71
	46.5%	18.3%	64.8%	32.4%	2.8%	35.2%	21.1%	
ALEXANDRA PARADE - August 2014	35	8	43	25	3	28	11	71
	49.3%	11.3%	60.6%	35.2%	4.2%	39.4%	15.5%	
BAILLIESTON - March 2008	33	3	36	31	3	34	6	70
	47.1%	4.3%	51.4%	44.3%	4.3%	48.6%	8.6%	
BAILLIESTON - September 2012	35	2	37	32	0	32	2	69
	50.7%	2.9%	53.6%	46.4%	0.0%	46.4%	2.9%	
BAILLIESTON - September 2014	37	1	38	30	1	31	2	69
	53.6%	1.4%	55.1%	43.5%	1.4%	44.9%	2.9%	
CESSNOCK - September 2007	32	9	41	19	7	26	16	67
	47.8%	13.4%	61.2%	28.4%	10.4%	38.8%	23.9%	
CESSNOCK - September 2012	35	8	43	20	4	24	12	67
	52.2%	11.9%	64.2%	29.9%	6.0%	35.8%	17.9%	
CESSNOCK - August 2014	37	9	46	19	2	21	11	67
	55.2%	13.4%	68.7%	28.4%	3.0%	31.3%	16.4%	
SPRINGBURN - February 2007	38	9	47	20	0	20	9	67
	56.7%	13.4%	70.1%	29.9%	0.0%	29.9%	13.4%	
SPRINGBURN - September 2012	35	7	42	20	2	22	9	64
	54.7%	10.9%	65.6%	31.3%	3.1%	34.4%	14.1%	
SPRINGBURN - August 2014	35	8	43	21	1	22	9	65
	53.8%	12.3%	66.2%	32.3%	1.5%	33.8%	13.8%	
ANNIESLAND - December 2007	35	4	39	22	3	25	7	64
	54.7%	6.3%	60.9%	34.4%	4.7%	39.1%	10.9%	
ANNIESLAND - September 2013	37	2	39	24	0	24	2	63
	58.7%	3.2%	61.9%	38.1%	0.0%	38.1%	3.2%	
ANNIESLAND - August 2014	36	1	37	26	0	26	1	63
	57.1%	1.6%	58.7%	41.3%	0.0%	41.3%	1.6%	

Town Centre	Ground Floor Commercial Units							
	Class 1			Non-Class 1			Vacant	
	Operational	Vacant	Total	Operational	Vacant	Total	Total	
<b>Medium Centres</b>								
ALBERT DRIVE - July 2007	47	2	49	12	2	14	4	63
	74.6%	3.2%	77.8%	19.0%	3.2%	22.2%	6.3%	
ALBERT DRIVE - December 2013	50	1	51	11	0	11	1	62
	80.6%	1.6%	82.3%	17.7%	0.0%	17.7%	1.6%	
ALBERT DRIVE - August 2014	51	0	51	11	0	11	0	62
	82.3%	0.0%	82.3%	17.7%	0.0%	17.7%	0.0%	
CASTLEMILK - July 2007	36	6	42	19	0	19	6	61
	59.0%	9.8%	68.9%	31.1%	0.0%	31.1%	9.8%	
CASTLEMILK - December 2013	32	5	37	19	2	21	7	58
	55.2%	8.6%	63.8%	32.8%	3.4%	36.2%	12.1%	
CASTLEMILK - August 2014	33	4	37	17	4	21	8	58
	56.9%	6.9%	63.8%	29.3%	6.9%	36.2%	13.8%	
WOODLANDS - December 2007	36	3	39	16	1	17	4	56
	64.3%	5.4%	69.6%	28.6%	1.8%	30.4%	7.1%	
WOODLANDS - September 2012	32	1	33	18	1	19	2	52
	61.5%	1.9%	63.5%	34.6%	1.9%	36.5%	3.8%	
WOODLANDS - July 2014	28	5	33	18	1	19	6	52
	53.8%	9.6%	63.5%	34.6%	1.9%	36.5%	11.5%	
HYNDLAND - December 2007	37	0	37	8	0	8	0	45
	82.2%	0.0%	82.2%	17.8%	0.0%	17.8%	0.0%	
HYNDLAND - September 2012	36	0	36	12	1	13	1	49
	73.5%	0.0%	73.5%	24.5%	2.0%	26.5%	2.0%	
HYNDLAND - August 2014	34	0	34	14	1	15	1	49
	69.4%	0.0%	69.4%	28.6%	2.0%	30.6%	2.0%	
KELVINBRIDGE - December 2007	24	2	26	15	1	16	3	42
	57.1%	4.8%	61.9%	35.7%	2.4%	38.1%	7.1%	
KELVINBRIDGE - September 2012	28	2	30	16	0	16	2	46
	60.9%	4.3%	65.2%	34.8%	0.0%	34.8%	4.3%	
KELVINBRIDGE - July 2014	29	0	29	15	1	16	1	45
	64.4%	0.0%	64.4%	33.3%	2.2%	35.6%	2.2%	

Town Centre	Ground Floor Commercial Units							
	Class 1			Non-Class 1			Vacant	
	Operational	Vacant	Total	Operational	Vacant	Total	Total	
<b>Small Centres</b>								
YOKER - November 2006	13	6	19	11	0	11	6	30
	43.3%	20.0%	63.3%	36.7%	0.0%	36.7%	20.0%	
YOKER - September 2012	14	2	16	10	4	14	6	30
	46.7%	6.7%	53.3%	33.3%	13.3%	46.7%	20.0%	
YOKER - August 2014	15	3	18	11	3	14	6	32
	46.9%	9.4%	56.3%	34.4%	9.4%	43.8%	18.8%	
DRUMCHAPEL - October 2006	17	16	33	16	2	18	18	51
	33.3%	31.4%	64.7%	31.4%	3.9%	35.3%	35.3%	
DRUMCHAPEL - September 2012	14	2	16	10	0	10	2	26
	53.8%	7.7%	61.5%	38.5%	0.0%	38.5%	7.7%	
DRUMCHAPEL - August 2014	15	2	17	9	2	11	4	28
	53.6%	7.1%	60.7%	32.1%	7.1%	39.3%	14.3%	
CROFTFOOT - November 2007	14	1	15	10	0	10	1	25
	56.0%	4.0%	60.0%	40.0%	0.0%	40.0%	4.0%	
CROFTFOOT - December 2012	14	0	14	10	0	10	0	24
	58.3%	0.0%	58.3%	41.7%	0.0%	41.7%	0.0%	
CROFTFOOT - August 2014	14	0	14	10	0	10	0	24
	58.3%	0.0%	58.3%	41.7%	0.0%	41.7%	0.0%	
BARRACHNIE - January 2008	7	0	7	16	0	16	0	23
	30.4%	0.0%	30.4%	69.6%	0.0%	69.6%	0.0%	
BARRACHNIE - September 2012	7	0	7	15	1	16	1	23
	30.4%	0.0%	30.4%	65.2%	4.3%	69.6%	4.3%	
BARRACHNIE - September 2014	6	1	7	14	2	16	3	23
	26.1%	4.3%	30.4%	60.9%	8.7%	69.6%	13.0%	
KNIGHTSWOOD - April 2008	15	0	15	8	0	8	0	23
	65.2%	0.0%	65.2%	34.8%	0.0%	34.8%	0.0%	
KNIGHTSWOOD - January 2012	12	2	14	7	1	8	3	22
	54.5%	9.1%	63.6%	31.8%	4.5%	36.4%	13.6%	
KNIGHTSWOOD - August 2014	13	0	13	8	1	9	1	22
	59.1%	0.0%	59.1%	36.4%	4.5%	40.9%	4.5%	
GORBALS - August 2006	7	1	8	3	0	3	1	11
	63.6%	9.1%	72.7%	27.3%	0.0%	27.3%	9.1%	
GORBALS - October 2012	11	0	11	5	0	5	0	16
	68.8%	0.0%	68.8%	31.3%	0.0%	31.3%	0.0%	
GORBALS - July 2014	11	0	11	5	0	5	0	16
	68.8%	0.0%	68.8%	31.3%	0.0%	31.3%	0.0%	

## APPENDIX 2 – DEVELOPMENT MANAGEMENT QUESTIONNAIRE

Dear Colleagues,

As part of an ongoing Scottish Government Study into Betting shops and Pay Day Lenders in town centres, I have been asked to prepare some research into their impacts in areas of multiple deprivation. The findings of this will help inform future Supplementary Planning Guidance in Scotland.

As a Development Management officer with experience of town centre planning applications I would very much welcome your views.

Would it be possible to complete the short questionnaire below and forward it back to me by Friday 3<sup>rd</sup> July

**DEVELOPMENT MANAGEMENT QUESTIONNAIRE**

In processing planning applications how do you consider the impacts of Book Makers and Pay Day Lenders on the character and amenity of town centres?

- SEVERE
- SIGNIFICANT
- MODERATE
- MINOR
- LOW

If you consider the problem to be significant or severe, where specifically in Glasgow do you consider this a problem?

Should specific policy measures be introduced to counter this? YES NO

If YES, what?

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..... Thanks for your comments.

David Dunlop, Senior Planner  
[david.dunlop@drs.glasgow.gov.uk](mailto:david.dunlop@drs.glasgow.gov.uk) X 76097.

**APPENDIX 3 (Circulated to Shawlands Business Association & Community Council)**

**SHAWLANDS TOWN CENTRE CATCHMENT AREA – PILOT STUDY**

Glasgow City Council has been asked by the Scottish Government to develop Supplementary Planning Guidance on how local authorities should consider planning applications for changes of use to Betting shops and Pay Day Lenders within town centres.

As a customer, business or stakeholder located in the Shawlands Town Centre catchment I would appreciate your views on this issue.

In considering the impacts of Book Makers and Pay Day Lenders on the character and amenity of town centres including Shawlands do you consider there to be an issue and if so how would you rank this?

- SEVERE
- SIGNIFICANT
- MODERATE
- MINOR
- LOW

If you consider such uses have a minor or low impact on town centres or bring specific benefits please tell us your views

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If you consider the problem to be significant or severe, please tell us your views and how local authorities should address your concerns?

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If you consider there to be a problem in Glasgow where specifically do you think this occurs?

Should specific policy measures be introduced to counter this? YES NO

If YES, what?

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THANK YOU FOR YOUR VIEWS  
PLEASE SEND YOUR RESPONSE TO [Shawlands@drs.glasgow.gov.uk](mailto:Shawlands@drs.glasgow.gov.uk)  
Contact David Dunlop  
Development & Regeneration Services  
0141 287 6097 for further information.

#### **APPENDIX 4 – BUSINESS FEEDBACK – SHAWLANDS BUSINESS ASSOCIATION**

Shawlands Business Association is concerned that betting shops and pay day lenders should be kept to a minimum within the Shawlands Town Centre Action Plan area.

Bookies however are already pulling out of town centres as on line gambling increases – It is therefore a considerable social issue.

Town centres therefore 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.

A very difficult balancing act is therefore required within the management of each town centre so as not to alienate some sections of the customer base and community to the benefit of others.

**APPENDIX 5 – COMMUNITY COUNCIL FEEDBACK**