

# Pay day lending and betting shops: planning guidance

AUGUST 2016





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## Introduction

Over recent years concerns have been expressed by the Council and within the community about the overall number and clustering of pay day lending and betting shops in Clydebank and Dumbarton town centre, particularly in relation to impact on the character and amenity of the town centres and the wellbeing of communities.

There have also been concerns expressed from within the Scottish Government about gambling and pay day lending uses. In April 2014, a summit on tackling pay day lending and gambling in Scottish town centres and neighbourhoods was hosted by Derek MacKay MSP, who was at the time Minister for Local Government and

Planning, and in June 2014 a revised Scottish Planning Policy was published that reflected concerns about the number and clustering of betting offices and high interest money lending premises in town centres.

This document offers guidance on how the relevant parts of the development plan should be applied when assessing proposals for pay day lending and betting shop uses along with evidence in relation to the impact of such uses on town centres and community wellbeing.

# Pay day lenders and betting shops: defining the issue

The Financial Conduct Authority's definition states that a payday lender offers high cost short-term credit where:

- **APR is equal to or higher than 100%**
- **Credit is provided for any period up to 12 months**
- **Credit is not secured by a mortgage, charge or pledge**

Betting is defined by the Gambling Act 2005 as the making or accepting of a bet on:

- **the outcome of a race, competition or other event or process**
- **the likelihood of anything occurring or not occurring**
- **whether anything is or is not true.**

This guidance relates to the offering of these services (i.e. high cost-short term credit and the accepting of bets) in premises. Betting offices fall within Class 2 (Financial, professional and other services) of the Use Class Order (Scotland)

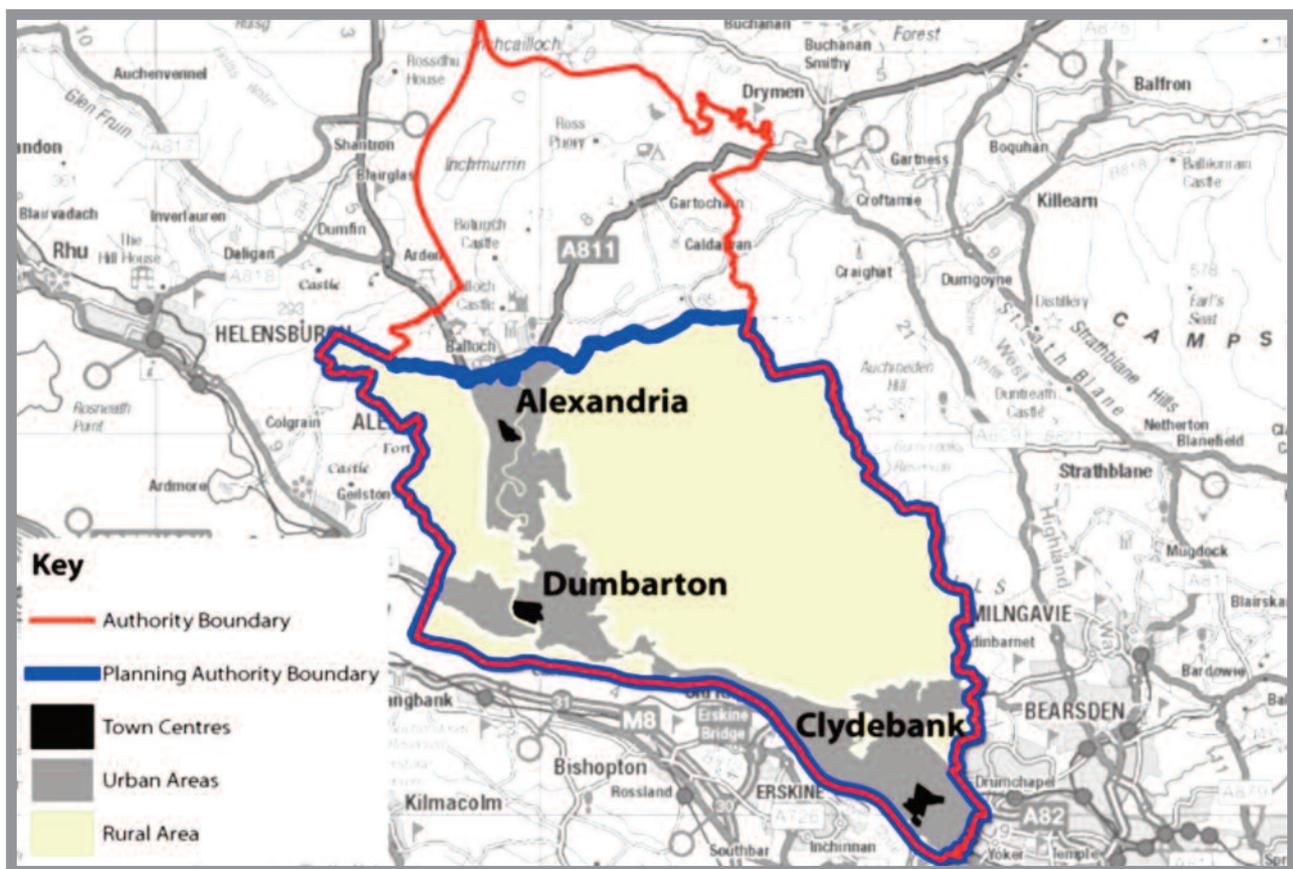
1997. Pay day lenders are also within this use class, although pay day loans can also be offered in premises in which the main purpose is clearly retail. This guidance relates to those instances where pay day lending is offered in premises which are identified as being Use Class 2.

## West Dunbartonshire: profile and vulnerability to gambling and high interest debt

West Dunbartonshire is a mixed urban-rural area sitting in the north-west of the Glasgow city-region. In 2014, West Dunbartonshire's population was officially estimated to be 89,730, the majority of which lived in the urban areas of Clydebank, Dumbarton and the Vale of Leven.

The West Dunbartonshire Council planning authority area excludes that part of the Council area within the Loch Lomond and the Trossachs National Park i.e northern parts of Balloch and the rural area to the east and west of Loch Lomond. West Dunbartonshire's three main town centres - Alexandria, Clydebank and Dumbarton - and the majority of the urban area sit within the Council planning authority area.

**Map 1:**  
**West Dunbartonshire Council and Planning Authority area**



On many measures, West Dunbartonshire can be identified as one of Scotland's most deprived Council areas. In 2012, 41 of West Dunbartonshire's 118 datazones (34.7%) were within Scotland's 20% most deprived datazones, and 12 (10.2%) were within Scotland's 5% most deprived datazones<sup>1</sup>. Table 1 provides further evidence that West Dunbartonshire compares poorly to the Scottish average when considering employment, benefits and earnings data.

<sup>1</sup><http://simd.scotland.gov.uk/publication-2012/simd-2012-results/overall-simd-results/most-deprived-datazones/>

**Table 1:**  
**West Dunbartonshire/Scotland comparison of employment, benefits and earnings data**

Measure	West Dunbartonshire	Scotland
<b>Economically active</b> % of residents aged 16 - 64	73.2%	77.8%
<b>Unemployment</b> % of economically active residents	7.7%	6.0%
<b>Long-term sick</b> % of economically inactive	40.7%	26.3%
<b>Earnings per residence</b> per week	£500.30	£527.00
<b>Out-of-work benefits</b> % of residents aged 16 - 64 claiming Job Seekers Allowance	2.8%	1.7%
<b>Benefit claimants</b> % of residents aged 16 - 64	20.1%	14.2%

Figures derived from [www.nomisweb.co.uk](http://www.nomisweb.co.uk), February 2016

Commissioned by the Responsible Gambling Fund, research prepared by Geofutures and the National Centre for Social Research<sup>2</sup> investigated relationships between the location of gambling machines and the socio-demographic and economic environment in which they are situated. The research found that areas with a high density of fixed odds betting terminals tend to have poorer socio-economic indicators. The report identifies Clydebank as being a High Density Machine Zone<sup>3</sup> - an area where there is a high density of gambling machines. It finds that areas

of high machine density tend to have poorer socio-economic indicators, with a higher proportion being low income areas and a higher proportion of residents being economically inactive. Of those who are economically active, a greater number active are in the lowest socio-economic sub-groups<sup>4</sup>. Table 2 provides evidence of this showing that West Dunbartonshire has a higher number of betting shop licences per person than other local authorities with a similar population, but which do not have as high a proportion of datazones within the 20% most deprived.

<sup>2</sup>Wardle H., Keily R., Thurstain-Goodwin M. and Astbury G. 2011. Mapping the social and economic characteristics of high density gambling machine locations. National Centre for Social Research and Geofutures Ltd. <sup>3</sup> Ibid., p.55. <sup>4</sup> Ibid., p.57.

**Table 2:**  
**Local Authority population and betting shop licence comparison**

Local authority area	Population	Betting shop licences	Persons per licence
East Renfrewshire	91,580	14	6,541
Stirling	92,380	15	6,159
West Dunbartonshire	89,370	25	3,574
Argyll & Bute	87,660	11	7,969
Midlothian	86,210	7	12,315

Betting shop licence figures derived from [www.stopthefobts.org](http://www.stopthefobts.org), February 2016. Original source is [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

# Policy context

Scottish Planning Policy states that planning for town centres should be flexible and proactive, enabling a wide range of uses which bring people into town centres, and that the planning system should encourage a mix of uses in town centres to support their vibrancy, vitality and viability throughout the day and into the evening.

Scottish Planning Policy recognises that there are concerns about the number and clustering of uses such as betting offices and high interest money lending premises in some town and local centres. It states that plans should include policies to support an appropriate mix of uses in town centres, local centres and high streets, and that where a town centre strategy indicates that further provision of particular activities would undermine the character and amenity of centres or the wellbeing of communities, plans should include policies to prevent such over-provision and clustering.

The West Dunbartonshire Local Development Plan identifies core retail areas in Dumbarton and Clydebank town centres where Policy SC2 applies. The purpose of the core retail area and the policy is to maintain a mix of shops and other uses, and in particular to guard against a proliferation of Class 2 uses. Policy SC2 states

that proposals for 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.**

In February 2015, the Council held a design charrette focussing on Clydebank town centre. The charrette report was approved by the Council's Infrastructure and Regeneration Committee in September 2015. There are several references in the report to the clustering to betting shops, pay day lenders and amusement arcades in Sylvania Way South, and an action for the Council to improve its evidence base on the negative impact of pay day lenders and betting shops on economic/health wellbeing.



## Current situation

The Council undertakes a town centre outlet survey in Spring each year to record what types of uses are occupying town centre units and to analyse the year on year change in the mix of uses and vacancy rates. Maps 2 and 3 highlight betting offices and pay day lending premises in Clydebank and Dumbarton town centres, and those premises with planning permission.

### Clydebank Town Centre

The Clyde Shopping Centre forms the majority of Clydebank town centre. The northern part of the centre is a modernised enclosed mall, and the southern part (Sylvania Way South) an unenclosed, but partially covered and fully pedestrianised, shopping area. The northern mall is adjoined by some larger retail units including a superstore, a cinema and restaurant uses, and car parking. Other uses in the town include Council offices and a leisure centre. There are also some more traditional streets with commercial uses on ground floor and flats above. Clydebank has good access links with a rail station in the town centre and another nearby, designated bus and taxi areas, and parking adjoining the shopping centre.

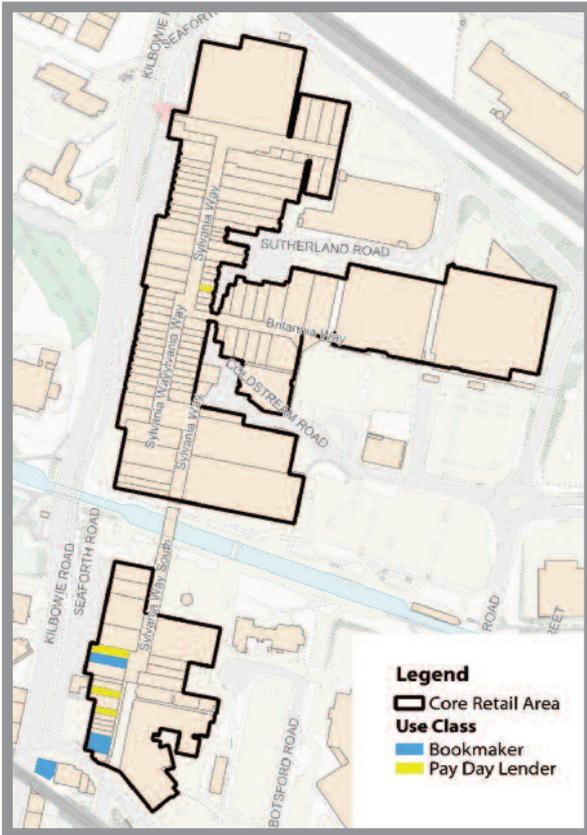
A core retail area is identified within the town centre by the Local Development Plan. Policy SC2 applies here, the purpose of which is to maintain a quality retail offer at the heart of the town centre and control against a proliferation of Class 2 uses. This covers the enclosed mall, adjoining large retail units and Sylvania Way South.

Table 3 details the number of betting shops and premises offering high interest lending in Clydebank town centre. Pay day lending and gambling uses are clustered on Sylvania Way South, where there are 2 betting shops and 3 premises offering high interest lending. There is also an amusement arcade on Sylvania Way South, another within the indoor market on Sylvania Way South and another close-by on Chalmers Street. There is another betting shop nearby on Chalmers Street. Another premises offering high-interest lending can be found on Sylvania Way.

Sylvania Way South is an area where the cluster of betting and pay day lending shops is very noticeable. With there also being 3 traditional banks on the street, it is an area where the retail offer is significantly less attractive than elsewhere in the town centre. This is particularly significant as it serves as a main gateway to the town centre linking Clydebank rail station and main bus stops on Chalmers Street with the rest of the town centre.

**Table 3:**  
**Betting shop and high interest lending premises in Clydebank town centre**

Clydebank town centre	
Betting shop premises	3
High-interest lending premises	4



**Map 2:**  
Clydebank town centre

## Dumbarton Town Centre

The town centre is based around the historic High Street and the more modern Artizan Centre. Beyond this area is a mix of residential and civic uses such as the Sheriff Court, municipal buildings and library. The town centre is served by a rail station and several bus services which make use of the High Street.

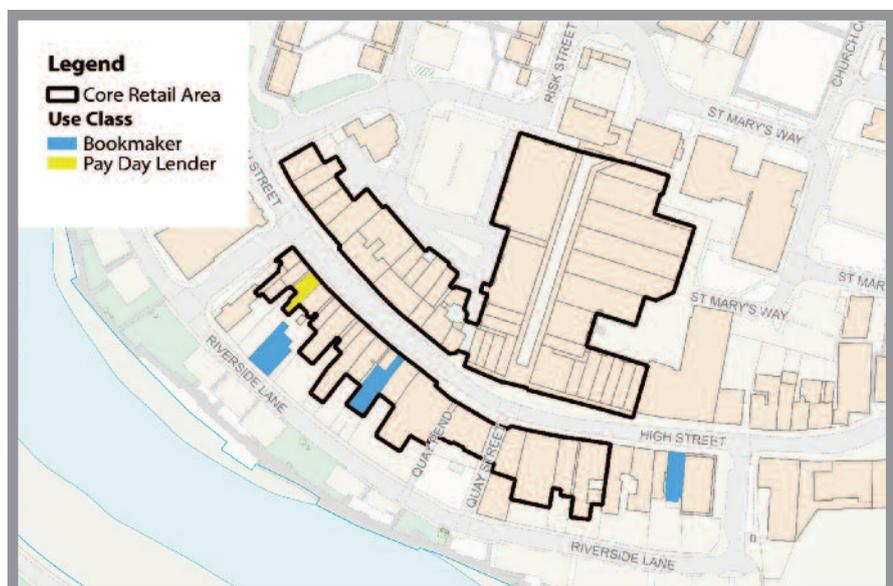
There is a core retail area identified within the town centre by the Local Development Plan, the purpose of which is to maintain a quality retail offer at the heart of the town centre and control against a proliferation of Class 2 uses. This covers the central part of the High Street and the Artizan Centre (College Way).

Table 4 details the number of betting shops and premises offering high interest lending in Dumbarton town centre. Pay day lending and betting shops are found along the High Street and in the Artizan Centre.

**Table 4:**  
Betting shop and high interest lending premises in Dumbarton town centre

Dumbarton town centre	
Betting shop premises	3
High-interest lending premises	2

**Map 3:**  
Dumbarton town centre



# Survey work and literature review

In preparing this guidance, two surveys have been undertaken by the Council:

- 1) The Councils' Citizen's Panel of over 1500 residents were surveyed in respect of their attitudes towards pay day lending and betting office premises. The survey prompted 1028 responses. This was supplemented by two focus groups, one in Clydebank and one in Dumbarton. Headline findings are set out below and the full research report is included at Appendix 1.
- 2) Customer counts of a variety of retail/commercial units were undertaken in Clydebank and Dumbarton town centres to provide an understanding of what contribution pay day lending and betting office premises made to footfall compared to other uses. Headline findings are set out below and the full results are included in Appendix 2.

Reference is also made to the Royal Society for Public Health's report on 'Health on the High Street' which undertook a national survey of public opinion on attitudes towards several high street uses including pay day lenders and betting shops.



## Citizen's Panel survey

The Council undertook a survey of its Citizen's Panel in August/September 2015. The survey results provide information of how residents within West Dunbartonshire view uses such as pay day lending and betting shops in terms of how they contribute to the vitality and viability of the area's town centres. The full survey is included as Appendix 1. Some headline statistics are included below.

*With regard to pay day lenders/pawn brokers:*

- **< 7%** felt they were important in a vibrant town centre
- **< 3%** agreed they add to the vitality/vibrancy of the town centre
- **71%** agreed that there are too many
- **7%** agreed they were important to help fill vacant premises

*At the focus group, views expressed on pay day lenders/pawnbrokers included:*

“

There is a clear demand for them, so they must provide a service for some people. I guess for some people they are a necessity.”

“

For some people the only option is the pay day lender. They are convenient in the sense that some people can get a small loan to see them through a short period until their benefits or wages are paid. Unfortunately, it doesn't always work out as simple as that and astronomical rates of interest are charged.”

“

I would prefer a couple of empty shops if it meant getting rid of these places (pay day lenders) from the High Street. They create the wrong impression and attract a criminal element.”

“

When you see these shops, the impression you get is of a community that has problems. They are not a sign of a healthy and vibrant community.”

*With regard to betting offices:*

- **< 6%** felt they were important in a vibrant town centre
- **9%** agreed they add to the vitality/vibrancy of the town centre
- **80%** agreed that there are too many
- **14%** agreed they were important to help fill vacancies

*At the focus group, views expressed on betting shops included:*



The bookies have always been part of our society...I had a friend who went to the bookies each morning...then came home and spent the afternoon watching the races on TV...he enjoyed it and it got him out of the house every day."



At least they pay business rates to the Council rather than there being even more depressing empty premises which generate no income. It might not be the shop that you want but it provides employment for some people."



In the olden days they (betting offices) were hidden up closes but now they are right on the High Street. Unfortunately, they now seem to be right at the centre of our community."

*The Citizen's Panel and focus group were also asked about the overall number and clustering of pay day lending and betting shops:*

- **75%** were concerned about the number and clustering of these uses
- **82%** agreed more of these uses would have a detrimental effect on vitality and vibrancy of town centres
- **4%** agreed more of these uses would improve vitality and vibrancy by increasing footfall
- **95%** agreed that the Council should be able to restrict the number and clustering of such uses



*At the focus group, views expressed on the overall number and clustering of payday lending and betting shops included:*

“

I'm a gambler and I like the fact that having two or three bookies in the town centre means there is competition and I can shop around to get better odds, but we don't need any more than the ones we've got. Two or three is plenty.”

“

In the lower part of Clydebank (shopping centre) all you have are charity shops, pound shops, pay day lenders, pawn shops and bookies. We definitely don't need any more of these. I understand some people want these places but we really don't need three or four in such a small area.”

“

The top half of the (Clydebank shopping) centre is not too bad...but the bottom part is all pound shops, charity shops, bookies, fruit machine places.”

“

I wouldn't want to see any more betting shops in the (Dumbarton) town centre.”

“

If there was a growth in the number of pay day lenders and bookies in Dumbarton, you might as well turn the lights out because it would destroy the town. People would avoid the High Street full stop. The High Street would be dead.”

“

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.”

Overall, the findings of the survey evidenced that West Dunbartonshire residents considered that pay day lending and betting shops, individually and collectively, had an adverse impact on the vitality and vibrancy of town centres.

The survey also sought views about the impact of pay day lending and betting shops on community wellbeing. Headline statistics are set out below.

*With regard to pay day lenders the survey found the following:*

- **90%** of respondents felt pay day lenders make it too easy for vulnerable people to get a loan
- **76%** of respondents felt pay day lenders charge very high interest rates
- **71%** of respondents felt pay day lenders are not good for the wellbeing of the community

*With regard to betting shops the survey found the following:*

- **79%** of respondents felt betting offices make it too easy to gamble
- **80%** of respondents felt there are too many betting offices
- **66%** of respondents felt betting offices are not good for the well being of the community
- **81%** of respondents considered that more pay day lending and betting shops would be bad for the health and wellbeing of the community





*At the focus group, comments on the community wellbeing issue included:*

“

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 wellbeing of our town and the community.”

“

I wouldn't want to see any more betting shops in the (Dumbarton) town centre. This is a deprived area and betting shops can be fatal for those who have a gambling addiction.”

“

In addition to the Citizen's Panel survey, discussions with Dumbarton Credit Union Ltd highlighted that there are issues within the West Dunbartonshire community with people getting into debt difficulty as a result of pay day lending and gambling (Appendix 3).

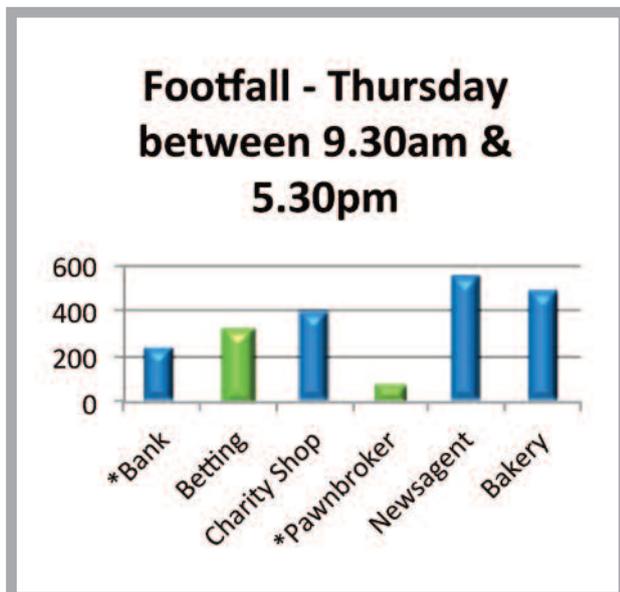
# Customer/ footfall counts

The Council undertook a survey of the number of customers visiting a variety of different shop/service types in Clydebank and Dumbarton town centres in September and October 2016. Full details of the survey methodology and full results are set out in Appendix 2.

The purpose of the survey was to gain an understanding of how many customers uses such as pay day lending and betting shops attracted to the town centres in comparison to other uses.

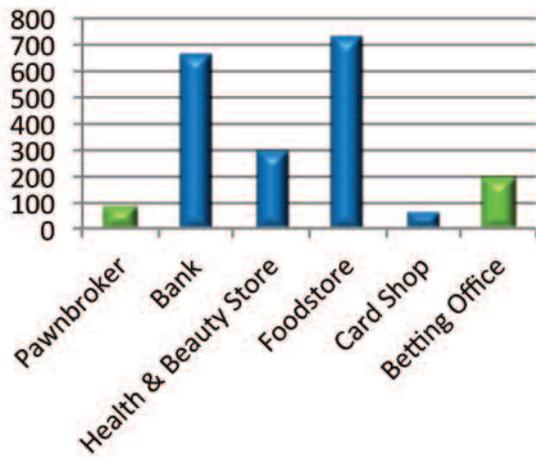
The results for Clydebank town centre indicate that whilst the betting shop surveyed attracted a comparable level of customers over the daytime period (9.30am to 5.30pm) to other uses, the pawnbroker surveyed attracted a significantly smaller amount of customers. Similar results were found in Dumbarton.

## Clydebank results

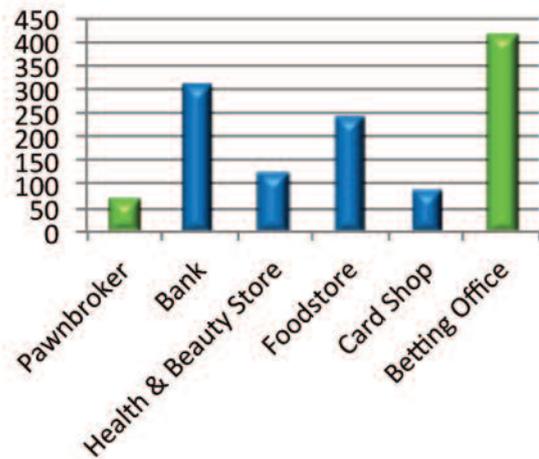


## Dumbarton results

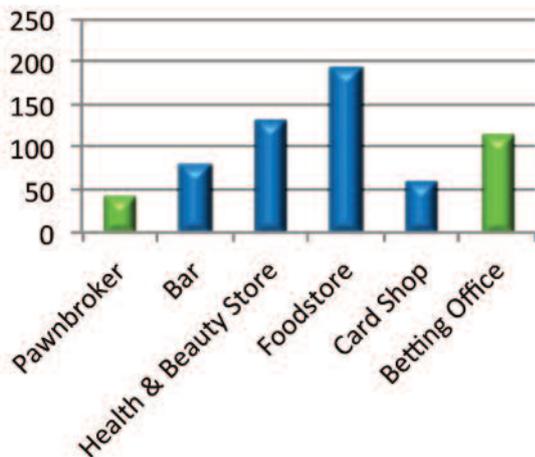
**Footfall - Thursday  
between 9.30am &  
5.30pm**



**Footfall - Saturday  
between 9.30am &  
1.30pm**



**Footfall - Saturday  
between 1.30pm and  
5.30pm**



## Evening results

### Clydebank evening count

Time	Unit	Tally
17.30 - 18.00	Ladbrokes	9
18.00 - 18.30	Paddy Power	10
18.00 - 18.30	Ladbrokes	3

### Dumbarton evening count

Time	Unit	Tally
17.30 - 18.00	William Hill	10
18.00 - 18.30	William Hill	10
18.00 - 18.30	William Hill	9

# Health of the High Street - the Royal Society for Public Health

The Royal Society for Public Health's report 'Health on the High Street' considers the positive and negative impacts of a range of town centre uses on health. Health was considered holistically with consideration given to:

- **Healthy lifestyle choices**
- **Social interaction**
- **Access to health care services and health advice**
- **Mental wellbeing**

The report used desk-based research, consultation with public health experts and a survey of a representative sample of 2000 members of the public to score a range of different high street uses in terms of their impact on health. Uses were given a score against each criteria ranging from +2 where the use had a positive impact on health to -2 where the use had a negative impact on health. A score of 0 was awarded when the impact was considered neutral.

Pay day loan shops scored -4, the lowest scoring use, scoring poorly against Healthy Choices and Mental Wellbeing, and neutral against Social Interaction and Access to Services and Advice.

Bookmakers scored -2, the second lowest score, scoring -1 against Healthy Choices and Mental Wellbeing, and neutral against Social Interaction and Access to Services and Advice.

The public survey part of the Royal Society for Public Health research found that with regard to pay day loan shops, 68% believe they discourage healthy choices, 65% believe they impact on mental wellbeing, and 57% believe they have no effect on providing access to health services. With regard to bookmakers, 54% believe they discourage healthy choices, 49% say they have no effect on promoting social interaction and 52% believe they have a negative impact on mental wellbeing.

# Application of Local Development Plan Policy SC2 criteria

Policy SC2 of the Local Development Plan sets out the criteria the Council will apply in determining planning applications for change of use from Class 1 uses in the core retail areas of Clydebank and Dumbarton town centres. Based on the findings of the preceding survey and research information, this section of the guidance sets out the Council's position in respect of changes of use to pay day lending or betting shops.

## Would the change significantly reduce the retail offer of the core retail area, or parts of it?

Whilst this is a relevant consideration in any application for change of use from retail to a pay day lending or betting use, as it is about the loss of retail rather than what the unit is to become, there is no specific guidance to be offered.

## Would the change lead to the concentration of a particular use to the detriment of the town centre's vitality and viability?

The evidence of the Council's Citizen's Panel survey and focus groups is that the majority of West Dunbartonshire residents feel that there are too many pay day lending and betting shops in Clydebank and Dumbarton town centres and very few felt that these uses contributed to the vitality/vibrancy of the town centres. There was majority concern about the clustering of these

uses and a majority felt that more of these uses would have a detrimental effect on the vitality and vibrancy of the town centres.

The vitality of a town centre is best judged by those who use it regularly. There is clear evidence that the users of West Dunbartonshire's town centres consider that pay day lending and betting shops have an adverse impact on the vitality of the area's town centres.

The southern part of Clydebank town centre comprising Sylvania Way South, Chalmers Street and Kilbowie Road (south) already has a concentration of pay day lending and betting shops to the detriment of its vitality. No further uses of this type will normally be supported in this area.

The covered and enclosed part of the Clyde Shopping centre to the north of the Forth and Clyde Canal is West Dunbartonshire's prime shopping area and the most attractive location for attracting new retail investment. The introduction of pay day lending and betting shops to this environment would be to the detriment of its vitality and will not normally be supported.

With regard to Dumbarton town centre, the Council's position is that these uses are already well provided for in the core retail area and applications for more such uses will not normally be supported.

## Would the proposed use contribute to the vibrancy of the town centre by increasing footfall?

The evidence of the footfall survey is that pawnbrokers offering pay day lending services attracted very few customers in relation to other town centre uses. Therefore, pay day lending uses will not be supported on the basis that they will contribute to footfall and the vitality of the town centre.

Over the course of a day, betting shops were

found to attract a level of customers that compared well to other town centre uses. However, the evidence that they increased evening activity was mixed. Therefore betting shops will not normally be supported on the basis that they contribute significantly to evening footfall and vitality.

### **Are there other suitable locations in the town centre for the proposed use to locate?**

Both Clydebank and Dumbarton town centres have commercial streets outwith their core retail areas. Premises in these streets are not subject to policy SC2. However, the criteria set out in Policy SC2 and impact on community wellbeing may still be relevant considerations in these areas and neighbourhood centres.

### **Has the unit affected by the proposal been vacant and suitably marketed for retail use?**

The Council accepts that a vacant ground floor unit is a lost opportunity to generate additional activity and commerce within a town centre, and that generally speaking it is of greater benefit to have a unit occupied. However, it is the Council's position that this should not be an overriding factor in any planning decision on change of use applications. This is backed up by the Citizen's Panel survey which indicated that only a small number of residents considered these uses to be important for filling vacant premises. In areas where there is already a cluster of betting and pay day lending shops the fact that a unit is vacant should be a lesser consideration.

## **Community wellbeing**

Evidence has been presented that West Dunbartonshire is one of Scotland's more deprived Council areas. Evidence has also been presented that there is a significantly higher number of betting shops per person in West Dunbartonshire than in other similar sized authorities suggesting a link between gambling and deprivation. The Citizen's Panel survey has highlighted concern within the community about the impact of pay day lending and gambling on community wellbeing.

There is sufficient evidence for community wellbeing to be considered as a material consideration in the assessment of applications for pay day lending and betting shops, and that the evidence approved within this guidance should give weight to that consideration.

# Conclusion

This guidance offers the following evidence in respect of pay day lending and betting shop uses:

- **The socio-economic profile of West Dunbartonshire means that it is vulnerable to the ill-effects of gambling and high-interest short-term credit**
- **There is already a significant presence of these uses in West Dunbartonshire, including a cluster of such uses in Clydebank town centre, and evidence of a much higher betting shop/ population ratio than similar sized authorities**
- **A policy context exists in Scottish Planning Policy and the Local Development Plan to control the further proliferation of such uses**
- **The majority of residents of West Dunbartonshire held negative views in respect of the contribution these uses make to the vitality and viability of the area's town centres.**
- **Pay day lending uses do not contribute significantly to daytime footfall, and betting shops only make a limited contribution to evening footfall**
- **Public opinion surveys at the national and local level highlight concerns in respect of the impact of pay day lending and betting shop uses on community wellbeing.**

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



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**September 2015**

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

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## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

### **1. Introduction**

This document sets out our report for West Dunbartonshire Council on Citizens' Panel research conducted to help build the evidence base to support the development of Supplementary Guidance on Pay Day Lending and Betting Offices Premises.

In our report:

- Section 2 sets out the background to and objectives of the assignment
- Section 3 outlines our approach to designing and conducting the research programme
- Section 4 presents Panel members' views on the importance of a vibrant town centre
- Section 5 deals with respondents' attitudes to pay day lenders in local town centres
- Section 6 assesses Panel members' views on betting offices in their local town centre
- Section 7 establishes Panel members' views on the impact of the number and clustering of pay day lenders and betting offices in local town centres
- Section 8 sets out our concluding comments

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

### 2. Background and Objectives

A recent report on pay day lending and gambling in Scottish town centres and neighbourhoods<sup>1</sup> cited the importance of town centres as a base for small businesses and local jobs as well as the important role they play in community identity. This was echoed in a second report<sup>2</sup> which saw town centres as an important part of vibrant communities and a critical engine for economic growth in local areas. It regarded high streets as having an important role to play in supporting the public's health; a healthy high street can provide the public with healthy choices, support community cohesion and social interaction, promote access to health services and support individual well being.

Both reports also highlighted a growing concern with the clustering of pay day lenders and betting offices in town centres, with the Scottish Government's policy objectives in relation to this aiming to:

- Improve town centres, creating vibrant community hubs with a range of services by tackling the increasing numbers and clustering of pay day lenders and betting offices
- Minimise exposure and potential adverse risk to vulnerable individuals of pay day lenders via town centres
- Minimise exposure and potential adverse risk to vulnerable individuals through gambling via town centres

However, the report from the May 2014 summit recognised that a key barrier to more coherent action was the complex nature of reserved and devolved legislation; Planning and Business rates are devolved while Financial Services, Consumer Credit and Gambling are reserved. Consequently, the Scottish Government and local authorities have limited controls on how to address concerns about the impact of pay day lenders and betting offices. Nevertheless, it was felt the Planning system could be used to guard against clustering of these types of premises.

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<sup>1</sup> Tackling Payday Lending and Gambling in Scottish Town Centres and Neighbourhoods. A report from a summit hosted by the Minister for Local Government and Planning, Scottish Government. May 2014.

<sup>2</sup> Health on the High Street. Royal Society for Public Health. 2015

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

West Dunbartonshire Council's Planning and Building Standards Department is now involved in a pilot project supported by the Scottish Government which involves the preparation of Supplementary Planning Guidance in relation to planning applications for pay day lenders and betting offices. The purpose of the pilot is to strengthen/develop the evidence base available when the Council wants to refuse planning applications for pay day lenders and betting offices.

The Supplementary Guidance is required to be based on a policy in the Council's existing Local Development Plan, which sets out criteria for the assessment of non-retail uses (such as pay day lenders and betting offices) in core retail areas. These criteria are:

- 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.

Criteria a, d and e can be assessed objectively as they are based on unit size or availability of units. Criteria b and c are more subjective and quite often based on a single officer's assessment. The Council therefore commissioned Hexagon Research and Consulting to develop more objective evidence for these criteria (b & c) based on public opinion.

Our approach to developing this evidence base is outlined in Section 3.

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

**3. Our Approach**

There is a requirement to generate robust and credible data to support the Supplementary Guidance which can withstand scrutiny as it will be used in reports to the Planning Committee and be subject to independent scrutiny by Reporters considering appeals. It is also important that any evidence has not been derived from what could be viewed as 'leading' questions.

To meet these requirements, we recommended using the West Dunbartonshire Citizens' Panel, a group of over 1,500 adults evenly divided between the Regeneration areas and the rest of West Dunbartonshire (more details of the Panel are attached at Appendix 1). In our view the Panel provided the ideal basis to conduct a two stage research programme:

**Stage 1 - Focus group research**

Two focus groups with members of the Citizens' Panel were held in Clydebank and Dumbarton with the overall aim was of establishing respondents' views on the impact of the clustering of pay day lenders and betting offices on their town centre (positive and negative). Respondents' views on how to deal with any concerns about these types of premises, including amending the Planning guidance, were also sought.

Each focus group was based on an agreed discussion guide (attached at Appendix 2), with the aim of obtaining respondents' views in an unprompted way. With the agreement of respondents, the focus groups were recorded to ensure their comments are presented accurately and verbatim comments can be included in our report (although these have been anonymised). Once detailed transcriptions of the discussions were made, the recordings were deleted. The focus groups were held on the 24<sup>th</sup> July 2015.

Location	Number of respondents	Breakdown of respondents
Garshake, Dumbarton	7	4 male, 3 female
Town Hall, Clydebank	8	4 male, 4 female

Supplementary Guidance on Pay Day Lending and Betting Offices Premises

**Stage 2 - Survey of the Citizens' Panel**

On completion of the focus group programme, the second stage involved a survey of all members of the Citizens' Panel. A postal survey approach was adopted for the survey which covered a number of issues in addition to the questions required for the evaluation of pay day lenders and betting offices (see Appendix 3). Questionnaires were sent out to Panel members in early August 2015. By early September, a final response of 1,028 returns had been achieved (68%), and the table below illustrates the high level of accuracy that can be attributed to the results derived from this response overall, as well as for the two main sub areas.

**Survey Response**

	<b>West Dunbartonshire</b>	<b>Dumbarton</b>	<b>Clydebank</b>	<b>Alexandria</b>
Sample achieved	1,028	316	443	269
Sampling error	± 3.0%	± 5.5%	± 4.7%	± 6.0%

As illustrated above, results for the Panel as a whole have sampling errors limited to only ± 3%. This means, for example, that if 50% of Panel members say they support the proposal for the Council to introduce planning policies so they would have stronger control over the change of a use of a property into a pay day lender or a betting office, the real figure would be in a narrow range, from only 47% to 53%.

The sampling errors for the three towns rise marginally to a range from only ± 4.7% to ± 6.0% and our analysis includes a breakdown by town as well as for West Dunbartonshire as a whole.

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

**4. The importance of a vibrant town centre**

Surveyed Panel members from Dumbarton use their town centre less regularly than those in the other two towns. For example, only 39% said they visited the town weekly, compared to 56% of those from Clydebank and 61% from Alexandria. Despite this, there is widespread agreement across all three towns on the importance of a vibrant town centre. Almost three quarters (72%) agree this is 'very important' while only 1% stated that a vibrant town centre was 'not very important'.

**How often would you visit your local town centre?**

	Dumbarton	Clydebank	Alexandria	West Dunbartonshire
Daily	12%	8%	16%	12%
2-3 times a week	27%	48%	45%	41%
Once a week	33%	22%	23%	25%
2-3 times a month	20%	12%	9%	14%
Once a month	6%	6%	0%	4%
Less than once a month	2%	4%	7%	4%
Never	0%	Under 1%	Under 1%	Under 1%

**How important do you think it is to have a vibrant town centre?**

	Dumbarton	Clydebank	Alexandria	West Dunbartonshire
Very important	74%	67%	78%	72%
Quite important	25%	30%	21%	26%
Not very important	1%	1%	2%	1%
Not important at all	0%	0%	0%	0%
Don't know	0%	2%	0%	1%

There was also unanimous support among focus group respondents for the concept of a vibrant town centre, with many citing reasons such as its importance to the health and well being of the local community, as a base for community activity and an important centre of employment.

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

***Of course a vibrant town centre is important. It's a sign of the health of the local community.***

Clydebank respondent

***A town centre should be about more than just shopping. It should encourage people to use it for social and recreational purposes, to provide a focus for community activity.***

Clydebank respondent

***At one time the town centre had the post office, the big army recruitment centre, the Council office where you could pay your rent and rates, the Registrar, as well as a good range of shops. There were important civic functions as well as good commercial outlets. It provided a wide range of activities and was an important centre of employment. That's what a vibrant town centre needs.***

Dumbarton respondent

The features which most survey respondents regard as 'very important' in a vibrant town centre include:

- A wide range of shops (79%)
- Good quality shops (74%)
- Banks (70%)
- Pharmacy/health facilities (68%)

Conversely, those which were regarded as being of least importance focused on:

- Betting offices (59% stated these were 'not important at all')
- Pay day lenders/pawn shops (57%)

These priorities were also reflected across the three town centres.

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**How important are the following in a vibrant town centre?**

	<b>Very important</b>	<b>Quite important</b>	<b>Not very important</b>	<b>Not important at all</b>	<b>Don't know</b>
Wide range of shops	79%	21%	Under 1%	Under 1%	0%
Fast food outlets	11%	42%	41%	6%	Under 1%
Pharmacy/health facilities	68%	30%	2%	Under 1%	0%
Pubs	3%	43%	43%	11%	Under 1%
Charity shops	5%	49%	35%	10%	1%
Cafes and restaurants	36%	57%	5%	2%	0%
Betting offices	Under 1%	5%	35%	59%	1%
Libraries/museums/art galleries	42%	50%	7%	1%	0%
Banks	70%	29%	1%	Under 1%	Under 1%
Good quality shops	74%	24%	1%	1%	Under 1%
Pay day lenders/pawn brokers	Under 1%	6%	33%	57%	3%
Green/open spaces	38%	50%	9%	2%	Under 1%
'Pound' shops	11%	45%	30%	12%	2%
Leisure facilities (cinema etc)	45%	48%	5%	2%	0%
Local Government/civic uses	33%	51%	12%	2%	2%

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**‘Very important’ aspects of a vibrant town centre**

	Dumbarton	Clydebank	Alexandria
Wide range of shops	77%	76%	87%
Fast food outlets	9%	10%	15%
Pharmacy/health facilities	73%	60%	73%
Pubs	6%	2%	1%
Charity shops	8%	4%	5%
Cafes and restaurants	44%	30%	39%
Betting offices	0%	1%	Under 1%
Libraries/museums/art galleries	36%	46%	43%
Banks	75%	60%	78%
Good quality shops	81%	72%	70%
Pay day lenders/pawn brokers	0%	1%	0%
Green/open spaces	34%	41%	38%
‘Pound’ shops	11%	9%	14%
Leisure facilities (cinema etc)	45%	46%	43%
Local Government/civic uses	38%	25%	38%

**Base: respondents stating “very important”**

Focus group respondents agreed that the key aspects of a vibrant town centre should include good quality shops, as well as community facilities and services and effective traffic management.

***Better quality shops has to be the starting point, but the town centre should also be a place for people to interact, so meeting places, places to sit, cafes and so on are needed.***

Clydebank respondent

***I also think a town centre needs community services such as a library, or a health centre or the Council’s one stop shop. It shouldn’t just be about shopping.***

Clydebank respondent

***There should be good traffic management to encourage the traffic to flow along the High Street. The one-way system is meant to do that but the parking is rarely policed and you get people parking on both sides of the road. So, when a bus***

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

***stops at a bus stop, it holds up all the traffic because the road isn't wide enough for cars to get past.***

Dumbarton respondent

Panel members were then asked to indicate the extent to which they were satisfied with each of these aspects of their own town centre. A very high level of satisfaction was recorded for banks (89%) and pharmacy/health facilities (86%), while over half were also satisfied with cafes and restaurants (60%) and libraries, museums and art galleries (58%). Conversely, more than half of all Panel members were dissatisfied with the range (57%) and quality (56%) of shops and approximately a third dissatisfied with pay day lenders/pawn shops (34%) and betting offices (32%).

This pattern was largely repeated across each town centre apart from significantly higher satisfaction in Clydebank for:

- Leisure facilities (70%)
- Local government/civic uses (58%)
- The range (44%) and quality (42%) of shops
- Fast food outlets (40%)

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**How satisfied are you with the following in your town centre?**

	Very satisfied	Quite satisfied	Neither satisfied nor dissatisfied	Quite dissatisfied	Very dissatisfied	Don't know
The range of shops	2%	22%	19%	37%	20%	0%
Fast food outlets	5%	25%	47%	12%	9%	2%
Pharmacy/health facilities	25%	61%	10%	4%	Under 1%	Under 1%
Pubs	6%	27%	49%	9%	3%	6%
Charity shops	6%	42%	41%	9%	1%	1%
Cafes and restaurants	6%	54%	22%	12%	5%	1%
Betting offices	4%	5%	51%	15%	17%	8%
Libraries/museum s/art galleries	10%	48%	24%	10%	5%	3%
Banks	30%	59%	7%	3%	Under 1%	1%
The quality of the shops	4%	25%	14%	36%	20%	1%
Pay day lenders/pawn brokers	3%	5%	47%	16%	18%	11%
Green/open spaces	8%	37%	27%	21%	7%	Under 1%
'Pound' shops	7%	29%	42%	10%	8%	4%
Leisure facilities (cinema etc)	6%	28%	20%	24%	19%	3%
Local Government/civic uses	4%	34%	39%	12%	4%	7%

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## Satisfied with aspects of your local town centre

	Dumbarton	Clydebank	Alexandria
The range of shops	8%	44%	11%
Fast food outlets	27%	40%	18%
Pharmacy/health facilities	92%	78%	93%
Pubs	40%	26%	35%
Charity shops	44%	51%	46%
Cafes and restaurants	50%	68%	56%
Betting offices	6%	12%	9%
Libraries/museums/art galleries	44%	67%	61%
Banks	88%	89%	90%
The quality of the shops	13%	42%	29%
Pay day lenders/pawn brokers	5%	7%	13%
Green/open spaces	37%	49%	47%
'Pound' shops	44%	41%	17%
Leisure facilities (cinema etc)	8%	70%	4%
Local Government/civic uses	24%	58%	23%

**Base: respondents stating “very satisfied” or “quite satisfied”**

These findings were consistent with the views of focus group respondents. Dumbarton residents in particular complained about the poor range of shops, the prevalence of charity shops and that there were too many empty properties.

***There is very little in the town centre now. I would only go in maybe once every few weeks, usually to the bank. I think the authorities are just papering over the cracks with the town centre. It really is a terrible place and just doesn't work.***  
Dumbarton respondent

***People do their food shopping out of town or go to the shopping centre in Clydebank. I don't know many people who would come into Dumbarton on a regular basis because the shops are so poor.***  
Dumbarton respondent

***The shopping centre at Clydebank is undercover. They tried to put up some cover at the Artizan Centre, some sheets of glass like an awning, but it's very poorly***

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

***designed and when it rains, the water just pours in. And they are never cleaned so the appearance is very off-putting.***

Dumbarton respondent

***Unfortunately, the town centre is now full of charity shops. I know they are serving a purpose but you wouldn't decide to go into town to look in the charity shops. They don't really add anything to the vitality of the High Street.***

Dumbarton respondent

***There are too many empty shops on the High Street. That is even worse than having lots of charity shops; it creates an air of neglect and decay.***

Dumbarton respondent

Clydebank focus group respondents said they visited their town centre more frequently, with some saying the shopping centre met most of their needs. However, there was a concern that the town didn't have a genuine town centre, only a shopping centre, with none of the community focus they would prefer to see. Some also said there were too many charity shops and 'pound' shops.

***I think the shopping centre is perfectly adequate. I use it every day for my food shopping and there is also a bank.***

Clydebank respondent

***The town centre used to be around here (the Town Hall). We don't really have a town centre, just a shopping centre. You've got 3 Queens Square where they re-instated the old bandstand and there are occasions when some event is put on. But now a cycle path goes right through it and you take your life in your hands walking across it. They spent £2.2m doing up 3 Queens Square in an attempt to improve the town centre but to me it was a complete waste of money. It doesn't provide a community focus for the town.***

Clydebank respondent

***I don't use it (the shopping centre) as much as I used to as it has become dominated by places like pound shops.***

Clydebank respondent

***There are too many charity shops, especially when they seem to be concentrated in one part of the centre.***

Clydebank respondent

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

### 5. Pay day lenders

To help the Council develop its evidence base to support new Planning Guidance, survey respondents were asked to state the extent to which they agreed or disagreed with ten statements about pay day lenders/pawn brokers in their town centre (to minimise bias, the statements were phrased to reflect both positive and negative views of pay day lenders/pawn brokers). As illustrated in the table below, there is a very high level of agreement that pay day lenders/pawn brokers:

- Make it too easy for vulnerable people to get a loan (90% agreed with this statement)
- Charge very high interest rates (76%)
- There are too many of them (71%)
- They are not good for the well being of the town centre (71%)

Significantly, 92% also disagreed that pay day lenders/pawn brokers add to the vitality/vibrancy of the town centre (with 68% 'disagreeing strongly'). There was also little support for the role pay day lenders/pawn brokers play in helping to fill vacant premises (88% disagreed that this was important, with 50% 'disagreeing strongly') or by paying business rates (62% disagreed that this was important). These views were also strongly reflected within each of the three towns.

Supplementary Guidance on Pay Day Lending and Betting Offices Premises

**Do you agree or disagree with the following statements about pay day lender/pawn brokers in your town centre?**

	<b>Strongly agree</b>	<b>Agree</b>	<b>Disagree</b>	<b>Strongly disagree</b>	<b>Don't know</b>
They are important because they help to fill vacant premises	1%	6%	38%	50%	5%
They charge very high interest rates	57%	19%	1%	3%	20%
They make an important contribution to the area by paying business rates	1%	15%	38%	24%	22%
They make it too easy for vulnerable people to get a loan	63%	27%	3%	1%	6%
They add to the vitality/vibrancy of the town centre	Under 1%	2%	24%	68%	6%
There are too many of them	44%	27%	7%	6%	16%
They provide an important service for those who can't access mainstream financial institutions	3%	21%	39%	24%	13%
They attract the wrong type of people into the town/put others off	21%	30%	25%	7%	17%
They are a valuable employer in the town centre	2%	9%	37%	25%	27%
They are not good for the well being of the community	37%	34%	8%	6%	15%

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

**Agreement with statements in your local town centre about pay day lenders/pawn shops**

	<b>Dumbarton</b>	<b>Clydebank</b>	<b>Alexandria</b>
They are important because they help to fill vacant premises	10%	8%	3%
They charge very high interest rates	88%	74%	66%
They make an important contribution to the area by paying business rates	22%	14%	11%
They make it too easy for vulnerable people to get a loan	92%	87%	91%
They add to the vitality/vibrancy of the town centre	5%	2%	2%
There are too many of them	80%	75%	55%
They provide an important service for those who can't access mainstream financial institutions	30%	24%	16%
They attract the wrong type of people into the town/put others off	49%	53%	49%
They are a valuable employer in the town centre	20%	6%	8%
They are not good for the well being of the community	66%	70%	76%

**Base: respondents stating "strongly agree" or "agree"**

Focus group respondents were also asked if they felt there was a role for pay day lenders in their town centres. Only a few agreed, saying that they suited some people.

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

***There is clearly a demand for them, so they must provide a service for some people. I guess for some people they are a necessity.***

Dumbarton respondent

***I do some volunteering work with St. Vincent de Paul and I see the lower end of the social scale. A Credit Union is a brilliant thing but a lot of people just can't get access to these because they can't save, whether it's through drugs or alcohol dependence. For some the only option is the pay day lender. They are convenient in the sense that some people can get a small loan to see them through a short period until their benefits or wages are paid. Unfortunately, it doesn't always work out as simple as that and astronomical rates of interest are charged.***

Clydebank respondent

However, the overwhelming view of focus group respondents was that pay day lenders were unwelcome in their town centres because of the high interest rates they charge, that their presence was not a sign of a healthy community as well as a feeling that the pawn broking aspect of some of the shops encouraged criminal behaviour.

***I work in the local Credit Union. Why on earth do people go in to these pay day lenders when there is a Credit Union on their doorstep? The interest in the Credit Union is 1% on the reduced balance. They can save to get some money behind them and get a loan when they need it at a low rate of interest.***

Clydebank respondent

***The pay day lenders argue that their loans are meant to be paid off quickly and the interest payable is usually a relatively small amount, but we all know they don't work like that. People borrowing the money usually extend the loan or take out another one and the interest piles up.***

Clydebank respondent

***I can't see what value they (pay day lenders) bring to the community other than to a small desperate minority. When you see these shops the impression you get is of a community that has problems. They are not a sign of a healthy and vibrant community.***

Clydebank respondent

***Some people just see what they are getting (a pay day loan) and don't think about the consequences. It's the same with the crowds you see in places like \*\*\*\*\* where they will get a TV valued at £600 for a few pounds a week but end up paying £3,000 for it as the weekly payments go on forever.***

Clydebank respondent

***My main concern is that the pay day lenders do not screen people properly so that they lend responsibly. They seem happy to lend to anyone and are probably glad when the customer can't pay back on time so they can add even more interest. That's not the type of business we should welcome on our High Street.***

Dumbarton respondent

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

***My worry is that they look like they are fences for criminal behaviour, offering cash for goods with little concern where they came from.***

Clydebank respondent

***I would prefer another couple of empty shops if it meant getting rid of these places (pay day lenders) from the High Street. They create the wrong impression and attract a criminal element.***

Dumbarton respondent

***I work in a charity shop and one of the lads who comes in from time to time told me when he is skint he nicks the footballs from outside \*\* \*\*\*\*\* then sells them to the pawn broker shop. He says he never gets asked where the things come from.***

Dumbarton respondent

***These pawn broker places just encourage crime. I know of one lad who broke into a church and stole two big brass candlesticks. When the Police found them in a pawn broker's shop, the manager said he had bought them that morning for a fiver. They were obviously worth a lot more but the manager turned a blind eye to where they had come from. We don't want that sort of thing going on in our town centre.***

Dumbarton respondent

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

### **6. Betting offices**

A similar approach was adopted to establish Panel members' views on betting offices in their town centre. Of the nine statements about betting offices, those which most survey respondents agreed with were:

- There are too many of them (80%)
- They make it too easy to gamble (79%)
- They are not good for the well being of the community (66%)

The majority of respondents also disagreed that betting offices:

- Added vitality and vibrancy to their town centre (85% disagreed, with 41% 'strongly disagreeing')
- Were important because they help to fill vacant premises (81% disagreed)

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

**Do you agree or disagree with the following statements about betting offices in your town centre?**

	<b>Strongly agree</b>	<b>Agree</b>	<b>Disagree</b>	<b>Strongly disagree</b>	<b>Don't know</b>
They are important because they help to fill vacant premises	1%	13%	42%	39%	5%
They make it too easy to gamble	44%	35%	13%	3%	5%
They make an important contribution to the area by paying business rates	2%	26%	30%	20%	22%
There are too many of them	44%	36%	6%	2%	12%
They add to the vitality/vibrancy of the town centre	2%	7%	44%	41%	6%
They attract the wrong type of people into the town/put others off	20%	28%	28%	9%	15%
They provide an important service for those who like to gamble	4%	40%	25%	17%	14%
They are not good for the well being of the community	32%	34%	17%	3%	14%
They are a valuable employer in the town centre	3%	20%	32%	19%	26%

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**Agreement with statements about betting shops**

	<b>Dumbarton</b>	<b>Clydebank</b>	<b>Alexandria</b>
They are important because they help to fill vacant premises	11%	15%	17%
They make it too easy to gamble	86%	81%	68%
They make an important contribution to the area by paying business rates	24%	27%	32%
There are too many of them	75%	83%	83%
They add to the vitality/vibrancy of the town centre	9%	6%	15%
They attract the wrong type of people into the town/put others off	55%	46%	46%
They provide an important service for those who like to gamble	47%	44%	39%
They are not good for the well being of the community	67%	69%	62%
They are a valuable employer in the town centre	29%	19%	22%

**Base: respondents stating “strongly agree” or “agree”**

Several focus group respondents acknowledged that betting offices have been around for a long time and can provide a useful service for some people. There was also an acceptance that they help to create employment and contribute income to the area through the payment of business rates.

***The bookie’s has always been part of our society and I’m sure there are some who enjoy the odd punt. I had a friend who went to the bookies each morning to place his bets then came home and spent the afternoon watching the races on the TV. It wouldn’t appeal to me but he enjoyed it and it got him out of the house every day.***  
Dumbarton respondent

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

***I've got a neighbour and he likes to have a wee bet now and then. I'm not opposed to that but surely we don't need to have more than one or two in the town.***

Clydebank respondent

***At least they pay business rates to the Council rather than there being even more depressing empty premises which generate no income. It might not be the shop that you want but it provides employment for some people.***

Dumbarton respondent

However, there was widespread concern among most focus group respondents about the number of betting offices, their siting at the heart of town centres and the growth of fixed odds betting terminals.

***Clydebank is a deprived area and people can't afford to lose money through gambling so I'm opposed to them being in busy places where people passing by might be tempted to go in.***

Clydebank respondent

***As well as the bookies there are places in the shopping centre where there are loads of fruit machines where kids as young as 10 or 12 can go. I think it's incredible that we are encouraging school kids to go to these places. In a few years time they will graduate to the bookies and a lifetime of debt.***

Clydebank respondent

***In the olden days they (betting offices) were hidden up closes but now they are right on the High Street. Unfortunately, they now seem to be right at the centre of our community.***

Dumbarton respondent

***These fixed odds betting terminals just eat money. I heard that they keep about 99 pence out of every pound bet.***

Dumbarton respondent

***The profit from the slot machines (fixed odds betting terminals) is massive. They are a real menace.***

Clydebank respondent

Supplementary Guidance on Pay Day Lending and Betting Offices Premises

**7. The number and clustering of pay day lenders and betting offices in town centres**

Given the views expressed above in relation to the perceived impact of pay day lenders and betting offices in West Dunbartonshire’s town centres, it is not surprising that the majority of Panel members stated they were concerned about the number of these premises (75%) as well as their clustering in particular parts of the town centres (70%). Conversely, typically only one in five respondents stated they were ‘not very concerned’ or ‘not concerned at all’.

**Are you concerned about the number and clustering of pay day lenders and betting offices in your town centre?**

	Very concerned	Quite concerned	Not very concerned	Not concerned at all	Don't know
The overall number of pay day lenders and betting offices in the town centre	31%	44%	15%	3%	7%
The clustering of pay day lenders and betting offices in particular parts of the town centre	32%	38%	18%	3%	9%

**Are you concerned about the number and clustering of pay day lenders and betting offices in your town centre?**

	Dumbarton	Clydebank	Alexandria
The overall number of pay day lenders and betting offices in the town centre	82%	75%	69%
The clustering of pay day lenders and betting offices in particular parts of the town centre	69%	77%	59%

**Base: respondents “very concerned” or “quite concerned”**

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

Focus group respondents in both towns also raised the issue (unprompted) of the clustering of pay day lenders and betting offices, with most saying they would prefer to see fewer of these outlets in their town centre.

***In the lower part of Clydebank (shopping centre) all you have are charity shops, pound shops, pay day lenders, pawn shops and bookies. We definitely don't need any more of these. I understand some people want these places but we really don't need three or four of each in such a small area.***

Clydebank respondent

***The top half of the centre is not too bad; there are some good shops there. But the bottom part is all pound shops, charity shops, bookies, fruit machine places. There is also a beautiful listed building, the old Co-operative building that is lying empty.***

Clydebank respondent

***There are three pay day lenders or pawn shops in a row at the bottom end of the shopping centre. I think there are more now than there were a few years ago. It's definitely not a problem that is going away.***

Clydebank respondent

***I wouldn't want to see any more betting shops in the town centre. This is a deprived area and betting shops can be fatal for those who have a gambling addiction.***

Dumbarton respondent

***You also get these 'cash generator' type of shops opening all the time. They can be good to get your foreign exchange when you're going on holiday, but the pawn broking and pay day loans side of the business is not welcome.***

Dumbarton respondent

Two of the Council's key criteria for the assessment of non-retail uses (such as pay day lenders and betting offices) in core retail areas are:

- Whether a change would lead to the concentration of a particular use to the detriment of the town centre's vitality and viability or,
- Whether the proposed use would make a contribution to the vibrancy of the town centre by increasing footfall

As illustrated in the table below, the vast majority of survey respondents (82%) agree that more pay day lenders and betting offices would have a detrimental effect on the vitality and vibrancy of their town centre. Conversely, only 4% agreed that more pay day lenders and betting offices would improve the vitality and vibrancy and vitality of their

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town centre by increasing footfall. In addition, 81% agreed that more pay day lenders and betting offices would be bad for the health and well being of the local community. These views were strongly reflected within each of the three towns.

**The effect of more pay day lenders and betting offices in your town centre**

It would have a detrimental effect on the vitality and vibrancy of the town centre	51%	31%	8%	1%	9%
It would improve the vitality and vibrancy of the town centre by increasing footfall	2%	2%	45%	45%	6%
It would be bad for the health and well being of the community	43%	38%	6%	3%	10%

**The effect of more pay day lenders and betting offices in your town centre**

	Dumbarton	Clydebank	Alexandria
It would have a detrimental effect on the vitality and vibrancy of the town centre	86%	77%	87%
It would improve the vitality and vibrancy of the town centre by increasing footfall	2%	6%	3%
It would be bad for the health and well being of the community	84%	81%	77%

**Base: respondents stating “strongly agree” or “agree”**

Survey respondents were asked to state the extent to which they agreed that the Council should be able to restrict the number and clustering of pay day lenders and betting offices in their town centre. Overall, 95% agreed with this statement, with 75% ‘strongly agreeing’, a pattern found across all three town. Less than 1% disagreed.

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**To what extent do you agree that the Council should be able to restrict the number and clustering of pay day lenders and betting offices in your town centre?**

	Dumbarton	Clydebank	Alexandria	West Dunbartonshire
Strongly agree	76%	77%	69%	75%
Agree	19%	18%	24%	20%
Disagree	0%	1%	0%	Under 1%
Strongly disagree	0%	1%	0%	Under 1%
Don't know	5%	3%	7%	5%

There was also universal agreement among focus group respondents that steps should be taken to prevent more pay day lenders and betting offices from opening in town centres, and in particular, from clustering in particular parts of the town centre.

***I'm a gambler and I like the fact that having two or three bookies in the town centre means there is competition and I can get shop around to get better odds, but we don't need any more than the ones we've got. Two or three is plenty.***  
Clydebank respondent

***We do not want more pay day lenders and bookies opening in the shopping centre or the streets around it. We made that clear during the Harry Corry case. We were up in arms about it.***  
Clydebank respondent

***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

***If there was a growth in the number of pay day lenders and bookies in Dumbarton, you may as well turn the lights out because it would destroy the town. People would avoid the High Street full stop. The High Street would be dead.***  
Dumbarton respondent

***They give them catchy names like but they are basically pawn shops. I get the feeling these are the only shops which can fill up the empty spaces in the High Street but I wouldn't say that was a good thing because there are simply too many of them already. I can understand some people may need them but surely one or two on the High Street is enough.***  
Dumbarton respondent

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

***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

***Siting a bookie's next to a pay day lender or a pawn broker is just asking for trouble.***

Clydebank respondent

***Surely it has reached the point where the local authorities can say, 'That's it. There aren't going to be any more bookies or any more pay day lenders'. I assume business of that nature have to be licensed so surely the Council can just stop awarding licenses to restrict the numbers.***

Dumbarton respondent

***The Council licenses bookies so I can't see why they don't refuse more licenses to reduce the number of premises.***

Dumbarton respondent

***Can't the Council set a cap on the number of licenses issued?***

Clydebank respondent

***I don't think the Council can do that (cap the number of licenses) because the Harry Corry case was an example of where the Council seemed unable to prevent the application for another betting office.***

Clydebank respondent

***What made me angry recently was when Harry Corry was closing someone wanted to use the site for another bookie's shop. The people of Clydebank all said no; we don't want another bookie's. That's the last thing we need. But the Council said they can go ahead and open a bookie's there. How can the Council take a decision like that against the wishes of the people? What can the people of Clydebank do to stop more bookies being opened if the Council won't help? It feels like we don't have a voice.***

Clydebank respondent

Respondents were informed that the Council has limited powers to address the number and clustering of pay day lenders and betting offices in town centres but one option would be to introduce planning policies so that the Council would have stronger control over the change of use of a property into a pay day lender or a betting office. As illustrated in the table below, 95% of Panel members said they would support this proposal, with more than two thirds (68%) saying they would 'strongly support' it. Only 2% said they opposed it.

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**To what extent would you support planning policies so that the Council would have stronger control over the change of a use of a property into pay day lender or a betting office?**

	Dumbarton	Clydebank	Alexandria	West Dunbartonshire
Strongly support	67%	72%	61%	68%
Support	30%	21%	32%	27%
Oppose	1%	4%	Under 1%	2%
Strongly oppose	0%	1%	0%	Under 1%
Don't know	2%	2%	7%	3%

This proposal was also widely welcomed by focus group respondents as an effective way to prevent the future clustering of pay day lenders and betting offices in their town centres.

***That's definitely something I would support. If only the Council had those powers at the time of the Harry Corry case, we would have felt a lot happier. At the time we felt we were being ignored but now I understand the Council and the Scottish government had no option.***

Clydebank respondent

***It clearly won't help with the existing problem of bookies and pay day lenders. We have to accept that. But it will ensure the problem won't get any worse.***

Clydebank respondent

***The Council should be in a position to be able to refuse an application for a new bookie's or pay day lender if they feel there are too many of them in the area already and more would be detrimental to the well being of the town. If the simplest way to do that is to amend the planning laws, then I'm all for that.***

Dumbarton respondent

***A lot of the political parties mentioned taking action against the proliferation of pay day lenders and betting offices in their manifestos. It's good to see that now seems to be bearing fruit. The pay day lenders are the scourge of our nation and they need to be stopped.***

Clydebank respondent

***That sounds a lot better than playing around with the business rates. It tackles the issue head on by refusing to allow more premises to be turned into pay day lenders or bookies shops.***

Dumbarton respondent

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

***I'm delighted to hear that action is being taken on this (dealing with the clustering of pay day lenders and betting offices). It restores your faith in the political process.***

Clydebank respondent

***The Scottish government has been criticised for being too authoritarian but this (the clustering of pay day lenders and betting offices) is an issue which does need intervention.***

Dumbarton respondent

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

### **8. Concluding Comments**

The survey and focus group research programme with members of the West Dunbartonshire Citizens' Panel has generated feedback on three key issues:

**The importance of a vibrant town centre** – respondents widely acknowledged the vital role a vibrant town centre can play in promoting community well being and cohesion

**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 well being. 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 (Criterion b for the assessment of non-retail uses in core retail areas)
- Only 4% stated that more pay day lenders and betting offices would improve the vitality and vibrancy of the town centre by increasing footfall (Criterion c)
- 95% of Panel members agreed that the Council should be able to restrict the number and clustering of pay day lenders and betting offices in town centres

**Widespread support for Supplementary Planning Guidance** – there was widespread support (95%) for planning policies which would give the Council stronger control over the change of use of a property into a pay day lender or a betting office

**Jim Patton**

**Director**

**Hexagon Research and Consulting**

**September 2015**

Supplementary Guidance on Pay Day Lending and Betting Offices Premises

**Appendix 1**  
**West Dunbartonshire Citizens' Panel**

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

The West Dunbartonshire Citizens' Panel was recruited with the following aims:

- To be representative of local residents and willing to be surveyed on a regular basis about the policies and services of the community planning partners
- To recruit approximately 500 Panel members from the regeneration areas and a further 500 across the rest of West Dunbartonshire
- To allow these views to be fed into the decision-making processes of the community planning partners
- To keep Panel members informed of the actions taken by community planning partners in response to the views expressed

### **Previous Recruitment Exercises**

The original Panel recruitment exercise in 2005 produced 1,185 members, with 542 in the Regeneration areas and 639 across the rest of West Dunbartonshire. With the aim of running typically four surveys with the Panel each year, it was agreed to refresh the Panel on a regular basis and refresh exercises were carried out in October 2007, March 2009, February 2011, September 2012 and March 2014.

### **The 2014 Refresh**

Between late February and late March 2014, two exercises were completed to refresh the Panel:

- To replace those removed from the Panel, a fresh sample of 7,500 residents was drawn from the edited edition of the 2013 Electoral Register for West Dunbartonshire. Of these, 5,000 lived in the Regeneration areas and 2,500 lived elsewhere within West Dunbartonshire. Based on previous recruitment exercises, it was anticipated there would be an interest to join the Panel from approximately 5% of those from the Regeneration areas and 10% from those who lived elsewhere in West Dunbartonshire, generating approximately 500 new Panel members. The recruitment questionnaire (Appendix 1) was therefore issued to

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

the sample of 7,500 which generated 511 responses from residents who ticked a declaration to indicate they wished to become Panel members

- In recognition of wanting to maintain the Panel at a similar size, the response to the last two survey exercises was examined, revealing 490 Panel members who had not replied to either. These were sent a letter advising them they would be withdrawn from the Panel unless they indicated they wished to remain Panel members through a Freepost reply. However, none responded to say they wished to remain Panel members, leaving a core of 992 Panel members before the refresh exercise

When the 511 new Panel members were added to the 992 existing Panel members, this gave a refreshed Panel of 1,503 members, with 747 in the regeneration areas and 756 in the rest of West Dunbartonshire.

### **2014 Panel Characteristics**

Overall, the 2014 Panel has a very similar composition to the 2012 Panel and also continues to reflect many of the characteristics of the West Dunbartonshire adult population, with most variations being limited to only a few percentage points (a full breakdown is provided in Appendix 2 to this report). This is particularly the case in terms of the following characteristics:

- Residents aged 30-59 (53.5% of the Panel compared to 50.9% in the Council's estimate)
- Gender (56.1% of the Panel is female compared to 53.6% in the Council's estimate)
- Ethnicity (the Council estimates 99.3% of the adult population is white. Excluding 'not stated' responses, the Panel has 97.8% white members)
- Residents in owner occupation (62.6% of the Panel compared to 58% in the Council's estimate)

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However, the principal difference is that the Panel has a higher proportion of who are aged 60+ (37.1% compared to 28.8% in the Council's estimate).

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## **Appendix 2**

### **Focus group discussion guide**

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**Supplementary Guidance on Pay Day Lending and Betting Offices Premises  
Focus Group Discussion Guide**

Introduction	<p>Welcome respondents and outline purpose of discussion:</p> <p>Stress the confidentiality of the discussion</p>
Your town centre	<p><b>How often do you visit your town centre?</b></p> <p><b>What do you visit the town centre for?</b></p> <p><b>Overall, how important is it to have a town centre that is ‘vibrant’ and has a positive impact on the well being of the local community?</b></p> <p><b>Why do you say that?</b>  <i>Prompt:</i>  <i>Good for community cohesion</i>  <i>Important for the local economy</i>  <i>Provides an identity for the town</i>  <i>Diverse range of shopping outlets</i>  <i>Important community facilities</i>  <i>Important business location</i></p>
A ‘vibrant’ town centre	<p><b>What are the characteristics you would associate with a good town centre?</b>  <i>Prompt:</i>  <i>Good range of shops</i>  <i>Pharmacies/health facilities</i>  <i>Leisure centres/health clubs</i>  <i>Libraries</i>  <i>Museums/art galleries</i>  <i>Pubs</i>  <i>Cafes and restaurants</i>  <i>Good open/green spaces</i>  <i>Good parking facilities</i>  <i>Good public transport</i></p> <p><b>What are the characteristics you would associate with a town centre that was not good?</b>  <i>Prompt:</i>  <i>PDLs</i>  <i>BOs</i>  <i>Tanning salons</i>  <i>Fast food outlets</i>  <i>Vacant premises</i>  <i>Litter</i>  <i>Traffic congestion</i></p>

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Rating your town centre	<p><b>Overall, how would you rate your town centre on these characteristics?</b></p> <p><b>What do you regard as the best aspects of your town centre?</b></p> <p><b>What do you regard as the worst aspects of your town centre?</b>  <i>Prompt:</i>  <i>Clustering of PDLs and BOs</i></p>
PDLs	<p><b>What are your views on the presence of PDLs in your town centre? First of all, your positive views.</b></p> <p><i>Prompt:</i>  <i>They help fill vacant premises</i>  <i>They help increase the footfall in the town centre</i>  <i>They provide a service for those who can't access mainstream financial institutions</i></p> <p><b>Have you any negative views on the presence of PDLs in your town centre?</b>  <i>Prompt:</i>  <i>They exploit the most vulnerable by making it too easy to get a loan</i>  <i>They charge very high interest rates</i>  <i>They are aggressive when pursuing payment</i>  <i>There are too many of them</i>  <i>They create a bad impression</i>  <i>They attract the wrong type of people into the town/put others off</i>  <i>They are not good for the well being of local communities</i></p>
BOs	<p><b>What are your views on the presence of BOs in your town centre? First of all, your positive views.</b></p> <p><i>Prompt:</i>  <i>They help fill vacant premises</i>  <i>They help increase the footfall in the town centre</i>  <i>They provide a service for those who like to gamble</i></p> <p><b>Have you any negative views on the presence of BOs in your town centre?</b>  <i>Prompt:</i>  <i>They exploit the most vulnerable by making it too easy to gamble</i>  <i>There are too many of them</i>  <i>They create a bad impression</i>  <i>They attract the wrong type of people into the town/put others off</i>  <i>They are not good for the well being of local communities</i></p>

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

Clustering of PDLs and BOs	<p><b>Do you think that allowing more properties to change their use to become PDLs or BOs would affect the town centre?</b></p> <p><b>In what way?</b></p> <p><i>Positive prompts:</i>  <i>It would be good for the vibrancy and vitality of the town centre</i>  <i>It would be good for community well being</i>  <i>It would help fill vacant premises</i>  <i>It would help increase the footfall in the town centre</i>  <i>It would provide a service for those who like to gamble</i></p> <p><i>Negative prompts:</i>  <i>It would not be good for the vibrancy and vitality of the town centre</i>  <i>It would not be good for community well being</i>  <i>They exploit the most vulnerable by making it too easy to gamble</i>  <i>There are already too many of them</i>  <i>They create a bad impression</i>  <i>They attract the wrong type of people into the town/put others off</i></p>
Solutions	<p><b>To what extent would you say you were concerned about the clustering of PDLs and BOs in your town centre?</b></p> <p><b>Overall, do you think action is needed to curtail the number and clustering of PDLs and BOs in your town centre?</b></p> <p><b>What steps do you think should be taken?</b></p> <p><i>Prompt:</i>  <i>They should be charged higher business rates</i>  <i>Planning permission should be refused for a change of use to a PDL or BO</i></p>
Closing remarks	<p>Council's role in pilot scheme to develop supplementary guidance by September for the Scottish Government</p> <p>Thank respondents and end</p>

Supplementary Guidance on Pay Day Lending and Betting Offices Premises

## **Appendix 3 Survey Questions**

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

**Section 2: Your Town Centre**

**Q7.** Which of the following do you regard as your local town centre?

- Dumbarton (the High Street, including the Artizan Shopping Centre)  1
- Clydebank (the Clyde Shopping Centre, Sylvania Way South and the streets near this)  2
- Alexandria (Main Street, Bank Street and Mitchell Way)  3

**Q8.** How often would you visit your local town centre?

- Daily  1
- 2-3 times a week  2
- Once a week  3
- 2-3 times a month  4
- Once a month  5
- Less than once a month  6
- Never  7

**Q9.** How important do you think it is to have a vibrant town centre?

- Very important  1
- Quite important  2
- Not very important  3
- Not important at all  4
- Don't know  5

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**Q10.** How important are the following in a vibrant town centre?

	Very important	Quite important	Not very important	Not important at all	Don't know
Wide range of shops	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
Fast food outlets	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
Pharmacy/health facilities	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
Pubs	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
Charity shops	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
Cafes and restaurants	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
Betting offices	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
Libraries/museums/art galleries	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
Banks	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
Good quality shops	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
Pay day lenders/pawn brokers	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
Green/open spaces	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
'Pound' shops	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
Leisure facilities (cinema etc)	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
Local Government/civic uses	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

**Q11.** Thinking of your own town centre, how satisfied or dissatisfied are you with the following?

	Very satisfied	Quite satisfied	Neither satisfied nor dissatisfied	Quite dissatisfied	Very dissatisfied	Don't know
The range of shops	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Fast food outlets	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Pharmacy/health facilities	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Pubs	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Charity shops	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Cafes and restaurants	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Betting offices	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Libraries/museums/art galleries	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Banks	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
The quality of the shops	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Pay day lenders/pawn brokers	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Green/open spaces	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
'Pound' shops	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Leisure facilities (cinema etc)	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Local Government/civic uses	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6

Supplementary Guidance on Pay Day Lending and Betting Offices Premises

**Pay Day Lenders/Pawn Brokers**

**Q12.** To what extent do you agree or disagree with the following statements about pay day lenders/pawn brokers in your town centre?

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know
They are important because they help to fill vacant premises	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
They charge very high interest rates	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
They make an important contribution to the area by paying business rates	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
They make it too easy for vulnerable people to get a loan	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
They add to the vitality/vibrancy of the town centre	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
There are too many of them	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
They provide an important service for those who can't access mainstream financial institutions	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
They attract the wrong type of people into the town/put others off	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
They are a valuable employer in the town centre	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
They are not good for the well being of the community	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

**Betting Offices**

**Q13.** To what extent do you agree or disagree with the following statements about betting offices ('bookies') in your town centre?

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know
They are important because they help to fill vacant premises	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
They make it too easy to gamble	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
They make an important contribution to the area by paying business rates	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
There are too many of them	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
They add to the vitality/vibrancy of the town centre	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
They attract the wrong type of people into the town/put others off	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
They provide an important service for those who like to gamble	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
They are not good for the well being of the community	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
They are a valuable employer in the town centre	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5

Supplementary Guidance on Pay Day Lending and Betting Offices Premises

**Clustering of Pay Day Lenders and Betting Offices**

**Q14.** To what extent are you concerned about the number and clustering of pay day lenders and betting offices in your town centre?

	Very concerned	Quite concerned	Not very concerned	Not concerned at all	Don't know
The overall number of pay day lenders and betting offices in the town centre	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
The clustering of pay day lenders and betting offices in particular parts of the town centre	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5

**Q15.** What would be the effect of more pay day lenders and betting offices being opened in your town centre? Please state whether you agree or disagree with the following statements

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know
It would have a detrimental effect on the vitality and vibrancy of the town centre	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
It would improve the vitality and vibrancy of the town centre by increasing footfall	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
It would be bad for the health and well being of the community	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5

## Supplementary Guidance on Pay Day Lending and Betting Offices Premises

**Q16.** To what extent do you agree that the Council should be able to restrict the number and clustering of pay day lenders and betting offices in your town centre?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know

1

2

3

4

5

**Q17.** The Council has limited powers to address the number and clustering of pay day lenders and betting offices in town centres.

One option would be to introduce planning policies so the Council would have stronger control over the change of a use of a property into a pay day lender or a betting office.

To what extent would you support this option?

Strongly support

Support

Oppose

Strongly oppose

Don't know

1

2

3

4

5

# Betting office and pay day loan lender customer count

## Introduction

This research provides background information in support of the Pay Day Lending and Betting Shops Planning Guidance. The guidance will assist in the decision making of planning applications for pay day lending and betting shops.

It was considered it would be useful to establish what contribution pay day lending and betting shops make to footfall in Clydebank and Dumbarton town centres in comparison to other town centre uses.

## Survey methodology

A total of 6 units were surveyed in each town centre across the typical shopping hours of 9.30am - 5.30pm and extended to count evening footfall generated by betting shops. This was carried out on a Thursday 10th September and Saturday 12th September in Clydebank; and Saturday 19th September and Thursday 1st October in Dumbarton; two days for each town centre. Of the 6 units surveyed in each town centre, a betting office and pay day lender were included, as well as 4 other retail/commercial related uses (see charts below). The method was to count the number of people entering each unit, with some exclusions such as young children, staff and postal workers. Surveys were based on a 10 minute count per unit per hour, and therefore do not reflect the actual footfall count for the day. However, the results have been weighted to reflect what an average count for the day would have been, based on the 10-minute results. The weighted results can be seen in the charts below.

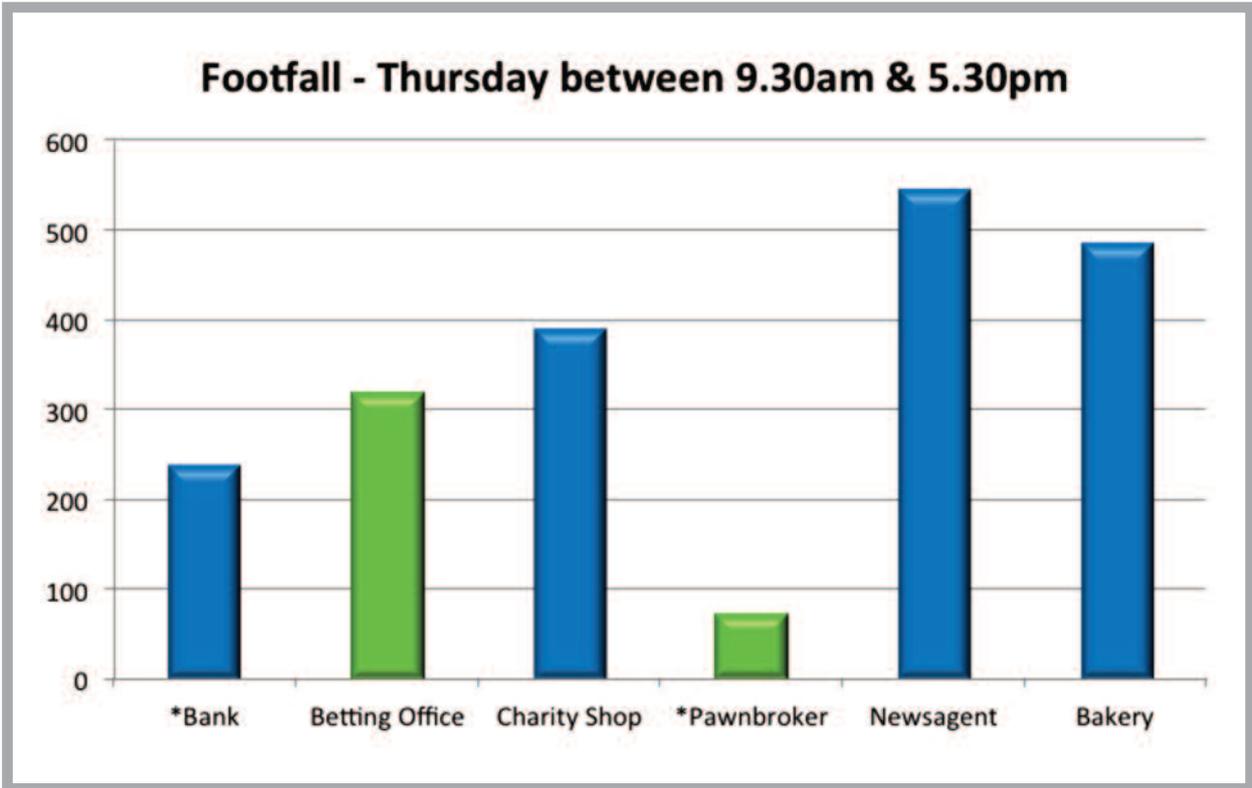
A further evening count of the betting offices was undertaken to gauge footfall coming into the centre after normal shop opening hours.

The survey was undertaken by Council staff.

## Footfall results

Figures 1 and 2 show the Clydebank results for each day. On Thursday the betting office was the fourth busiest shop, with the charity shop, newsagent and bakery attracting more customers. On Saturday, the betting office was the 2nd busiest unit, with the highest number of customers visiting the newsagent.

For both survey days, the pawnbroker attracted the least customers of all six units. It should be noted that the bank on both days closed earlier than the other stores (4.30pm on Thursday and 3.30pm on Saturday), as did the pawnbroker on the Thursday count (4.30pm).



<sup>1</sup>Figure 1

\*Bank and Pawnbroker closed during last hour of count (4.30pm - 5.30pm)



<sup>1</sup>Figure 2

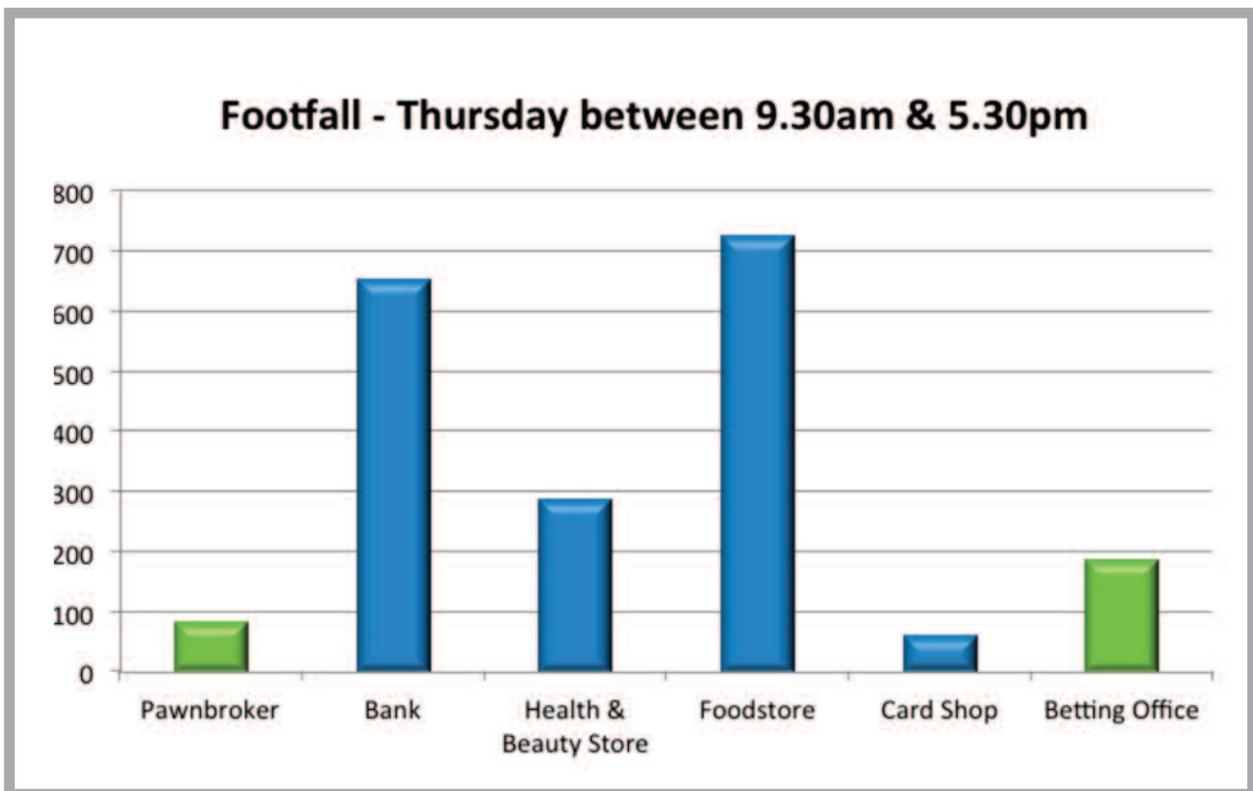
\*Bank closed during last two hours of count (3.30pm - 5.30pm)

<sup>1</sup> Results have been weighted to reflect an average count for the day

Figures 3 - 5 show the results for Dumbarton. Thursday's footfall was of a similar pattern to Clydebank, the betting shop was the fourth busiest unit when compared to the others. On Saturday morning the betting shop faired the busiest with higher footfall than the other units surveyed. In the afternoon this dropped to the third highest footfall.

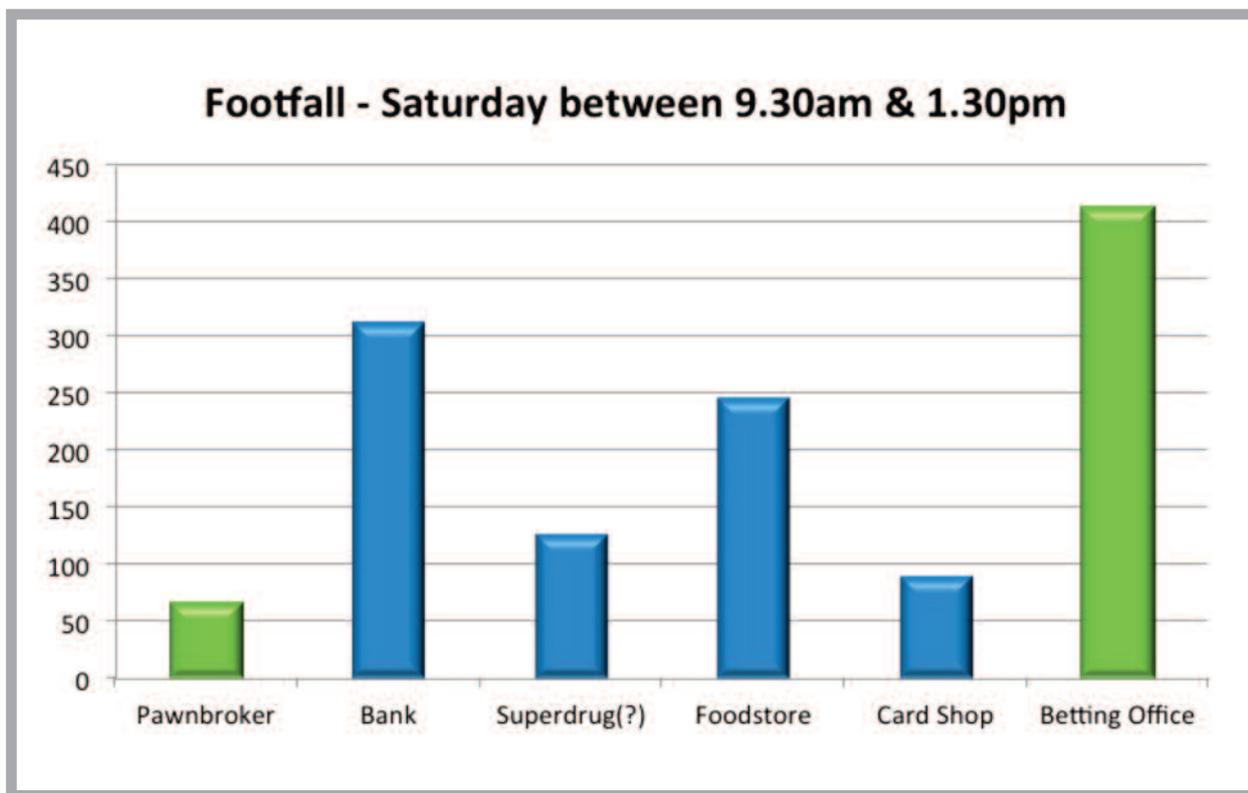
The pawnbroker took the second lowest footfall on Thursday with only the card shop taking less. On Saturday the pawnbroker had the lowest footfall for both morning and afternoon.

There are two separate charts displayed for Saturday. This is due to the bank closing at midday, and for the afternoon a public house was surveyed instead.

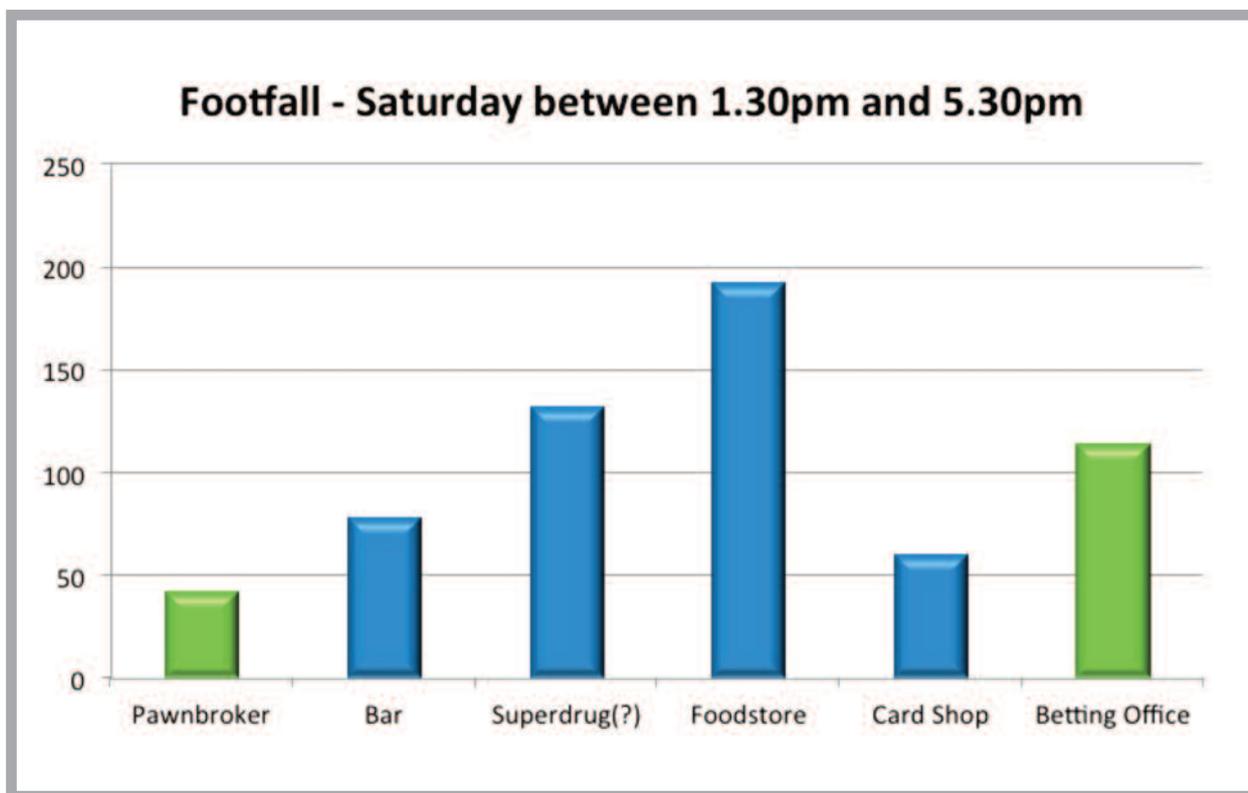


<sup>2</sup>Figure 3

<sup>2</sup> Results have been weighted to reflect an average count for the day



<sup>3</sup>Figure 4



<sup>3</sup>Figure 5

<sup>3</sup> Results have been weighted to reflect an average count for the day

## Evening count

This provided evidence of the footfall attracted into the centres during evening hours, after the typical closing hours of other stores. Betting shops in both town centres were open late into the evening.

In Clydebank two betting shops were surveyed for half hour periods between 5.30pm and 7pm on Thursday 12 September.

In Dumbarton. A single betting shop was surveyed between 5.30pm and 7.00pm on Thursday 1 October, with numbers recorded for half hour periods.

## Summary

From the results above, it is demonstrated that the betting offices attract a similar and at times higher footfall than that of other high street retailers/commercial users. It is also evident that such uses attract footfall into the early evening.

Generally speaking, the pawnbrokers did not have many customers in comparison to other high street occupiers.

# Customer count - actual recorded results

**Clydebank:** Thursday 10th September  
**Weather conditions:** Good, generally sunny throughout

**Hour: 9.30 - 10.30**

Unit	Tally
Clydesdale Bank	7
Paddy Power	4
British Heart Foundation	5
H & T Pawn	2
RS McColl	14
Greggs	8

**Hour: 10.30 - 11.30**

Unit	Tally
Clydesdale Bank	5
Paddy Power	8
British Heart Foundation	13
H & T Pawn	1
RS McColl	11
Greggs	11

**Hour: 11.30 - 12.30**

Unit	Tally
Clydesdale Bank	3
Paddy Power	11
British Heart Foundation	22
H & T Pawn	3
RS McColl	16
Greggs	22

**Hour: 12.30 - 13.30**

Unit	Tally
Clydesdale Bank	7
Paddy Power	10
British Heart Foundation	12
H & T Pawn	1
RS McColl	14
Greggs	18

**Hour: 13.30 - 14.30**

Unit	Tally
Clydesdale Bank	4
Paddy Power	8
British Heart Foundation	7
H & T Pawn	2
RS McColl	10
Greggs	13

**Hour: 14.30 - 15.30**

Unit	Tally
Clydesdale Bank	4
Paddy Power	5
British Heart Foundation	3
H & T Pawn	2
RS McColl	7
Greggs	3

**Hour: 15.30 - 16.30**

Unit	Tally
Clydesdale Bank	10
Paddy Power	2
British Heart Foundation	2
H & T Pawn	1
RS McColl	9
Greggs	3

**Hour: 16.30 - 17.30**

Unit	Tally
Clydesdale Bank	CLOSED
Paddy Power	5
British Heart Foundation	1
H & T Pawn	CLOSED
RS McColl	10
Greggs	3

**Clydebank:** Thursday 10th September, evening count  
**Weather conditions:** Good, light

Time	Unit	Tally
17.30 - 18.00	Ladbrokes	9
18.00 - 18.30	Paddy Power	10
18.00 - 18.30	Ladbrokes	3

# Customer count - actual recorded results

**Clydebank:**                      **Saturday 12th September**  
**Weather conditions:**       **Overcast, occasional rain**

## Hour: 9.30 - 10.30

Unit	Tally
Royal Bank of Scotland	16
Paddy Power	5
British Heart Foundation	6
H & T Pawn	1
RS McColl	21
Greggs	6

## Hour: 10.30 - 11.30

Unit	Tally
Royal Bank of Scotland	13
Paddy Power	17
British Heart Foundation	12
H & T Pawn	0
RS McColl	21
Greggs	10

## Hour: 11.30 - 12.30

Unit	Tally
Royal Bank of Scotland	16
Paddy Power	16
British Heart Foundation	10
H & T Pawn	2
RS McColl	22
Greggs	12

## Hour: 12.30 - 13.30

Unit	Tally
Royal Bank of Scotland	10
Paddy Power	17
British Heart Foundation	19
H & T Pawn	1
RS McColl	14
Greggs	8

## Hour: 13.30 - 14.30

Unit	Tally
Royal Bank of Scotland	6
Paddy Power	13
British Heart Foundation	16
H & T Pawn	4
RS McColl	14
Greggs	23

## Hour: 14.30 - 15.30

Unit	Tally
Royal Bank of Scotland	13
Paddy Power	22
British Heart Foundation	10
H & T Pawn	1
RS McColl	10
Greggs	7

## Hour: 15.30 - 16.30

Unit	Tally
Royal Bank of Scotland	x
Paddy Power	4
British Heart Foundation	9
H & T Pawn	0
RS McColl	13
Greggs	10

## Hour: 16.30 - 17.30

Unit	Tally
Royal Bank of Scotland	x
Paddy Power	13
British Heart Foundation	9
H & T Pawn	1
RS McColl	12
Greggs	5

# Customer count - actual recorded results

**Dumbarton:**                      **Saturday 19th September**  
**Weather conditions:**       **Cloudy**

## Hour: 9.30 - 10.30

Unit	Tally
Ramsdens	1
Bank of Scotland	12
Superdrug	6
William Hill	14
Farmfoods	10
Hallmark & Thorntons	0

## Hour: 10.30 - 11.30

Unit	Tally
Ramsdens	2
Bank of Scotland	17
Superdrug	1
William Hill	20
Farmfoods	2
Hallmark & Thorntons	7

## Hour: 11.30 - 12.30

Unit	Tally
Ramsdens	4
Bank of Scotland	18
Superdrug	9
William Hill	27
Farmfoods	16
Hallmark & Thorntons	6

## Hour: 12.30 - 13.30

Unit	Tally
Ramsdens	4
Bank of Scotland	5
Superdrug	5
William Hill	8
Farmfoods	13
Hallmark & Thorntons	2

## Hour: 13.30 - 14.30

Unit	Tally
Ramsdens	5
Bank of Scotland	3
Superdrug	3
William Hill	8
Farmfoods	12
Hallmark & Thorntons	0

## Hour: 14.30 - 15.30

Unit	Tally
Ramsdens	0
Bank of Scotland	3
Superdrug	10
William Hill	6
Farmfoods	4
Hallmark & Thorntons	5

## Hour: 15.30 - 16.30

Unit	Tally
Ramsdens	2
Bank of Scotland	5
Superdrug	5
William Hill	1
Farmfoods	9
Hallmark & Thorntons	4

## Hour: 16.30 - 17.30

Unit	Tally
Ramsdens	0
Bank of Scotland	2
Superdrug	4
William Hill	4
Farmfoods	7
Hallmark & Thorntons	1

# Customer count - actual recorded results

**Dumbarton:** Thursday 1st October  
**Weather conditions:** Foggy start, clear/sunny for remainder

**Hour: 9.30 - 10.30**

Unit	Tally
Ramsdens	1
Bank of Scotland	16
Superdrug	2
Farmfoods	8
Hallmark & Thorntons	0
William Hill	1

**Hour: 10.30 - 11.30**

Unit	Tally
Ramsdens	0
Bank of Scotland	22
Superdrug	8
Farmfoods	10
Hallmark & Thorntons	1
William Hill	1

**Hour: 11.30 - 12.30**

Unit	Tally
Ramsdens	3
Bank of Scotland	12
Superdrug	6
Farmfoods	25
Hallmark & Thorntons	2
William Hill	2

**Hour: 12.30 - 13.30**

Unit	Tally
Ramsdens	2
Bank of Scotland	18
Superdrug	9
Farmfoods	10
Hallmark & Thorntons	4
William Hill	6

**Hour: 13.30 - 14.30**

Unit	Tally
Ramsdens	3
Bank of Scotland	17
Superdrug	8
Farmfoods	20
Hallmark & Thorntons	1
William Hill	3

**Hour: 14.30 - 15.30**

Unit	Tally
Ramsdens	3
Bank of Scotland	7
Superdrug	9
Farmfoods	15
Hallmark & Thorntons	1
William Hill	11

**Hour: 15.30 - 16.30**

Unit	Tally
Ramsdens	0
Bank of Scotland	9
Superdrug	4
Farmfoods	15
Hallmark & Thorntons	1
William Hill	3

**Hour: 16.30 - 17.30**

Unit	Tally
Ramsdens	2
Bank of Scotland	8
Superdrug	2
Farmfoods	18
Hallmark & Thorntons	0
William Hill	4

**Dumbarton:** Thursday 1st October, evening count  
**Weather conditions:** Good, light

Time	Unit	Tally
17.30 - 18.00	William Hill	10
18.00 - 18.30	William Hill	10
18.00 - 18.30	William Hill	9



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Alan Williamson  
Team Leader – Forward Planning  
Planning & Building Standards  
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Clydebank  
G81 1BF

16 October 2015

Dear Alan

Further to our recent meeting I would like to confirm that in the credit union's experience we have encountered many cases where we have been asked to help members who have been caught up in the never ending circle of pay day lenders. We have also been asked to help members who have fallen into debt because of their problems with gambling and the easy access to betting shops within our area.

People do not seem to realise the hold these organisations can have until it is too late with their importance being placed on the repayment amount rather than the total to be paid back and then they encounter difficulty should they fall into arrears. With both payday lenders and betting shops being plentiful in this area it is difficult for those in great need to avoid the temptation.

Dumbarton Credit Union tries to help those who are referred to them by either local agencies or relatives and friends. Members who for example have chaotic lifestyles, are unable to complete forms or have hidden debt they do not wish discovered were all persuaded by pay day lenders and have now managed to turn their lives around with our help.

I cannot emphasise enough how much these pay day lending and gambling organisations ruin the lives of many local residents.

Yours sincerely

Mrs Brenda Pasquire  
Office Manager



**Credit Union**

Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority

