

PLANNING COMMITTEE

At a Meeting of the Planning Committee held in Council Chamber, Clydebank Town Hall, Dumbarton Road, Clydebank on Wednesday, 23 March 2016 at 2.06 p.m.

Present: Provost Douglas McAllister and Councillors Denis Agnew, Gail Casey, Jonathan McColl, Patrick McGlinchey, John Mooney, Lawrence O'Neill and Tommy Rainey.

Attending: Jim McAloon, Head of Regeneration and Economic Development; Pamela Clifford, Planning and Building Standards Manager; Keith Bathgate, Team Leader – Development Management; Alan Williamson, Team Leader – Forward Planning; Raymond Walsh, Network Services Co-ordinator; Karen McChesney, Lead Planner; Nigel Ettles, Principal Solicitor and Nuala Quinn-Ross, Committee Officer, Legal, Democratic and Regulatory Services.

Apologies: Apologies for absence were intimated on behalf of Councillors Jim Finn and Hazel Sorrell.

Councillor Lawrence O'Neill in the Chair

DECLARATIONS OF INTEREST

It was noted that there were no declarations of interest in any of the items of business on the agenda.

MINUTES OF PREVIOUS MEETING

The Minutes of Meeting of the Planning Committee held on 24 February 2016 were submitted and approved as a correct record.

NOTE OF VISITATIONS

A Note of Visitations carried out on 22 February 2016, a copy of which forms Appendix 1 hereto, was submitted and noted.

PLANNING APPLICATION

A report was submitted by the Head of Regeneration and Economic Development in respect of the following planning application.

New Application:-

- (a) **DC15/234 - Mixed use development including residential, retail, financial/service, restaurant, public house, office, hotel, care home, health centre, assembly and leisure uses with associated car parking, access road, quay wall improvements and landscaping (Planning Permission in Principle) at Queens Quay, Cart Street by Clydeside Regeneration Limited.**

The Planning and Building Standards Manager was heard in further explanation of the report. The Lead Planner provided further background details of the application.

The Planning and Building Standards Manager, the Team Leader – Development Management and the Lead Planner were then heard in answer to Members' questions.

The Chair, Councillor O'Neill then invited Mr Paul O'Donnell from Clydeside Regeneration Limited to address the Committee. Mr O'Donnell was heard in support of the application and in answer to Members' questions.

The Committee agreed:-

- (1) that it was minded to grant planning permission in principle; and
- (2) that authority be delegated to the Planning & Building Standards Manager to issue the decision subject to the conditions set out in Section 9 of the report, details of which are contained within Appendix 2 herewith and to the satisfactory conclusion of a legal agreement or other suitable mechanism to secure the payment of a developer contribution towards future bus services.

WEST DUNBARTONSHIRE LOCAL DEVELOPMENT PLAN

A report was submitted by the Head of Regeneration and Economic Development providing an update on the Local Development Plan.

After discussion and having heard the Planning and Building Standards Manager and the Team Leader – Forward Planning in further explanation of the report and in answer to Members' questions, the Committee agreed to continue this item of business to the April meeting of the Committee to allow external independent advice to be sought on the legal options available with regards to the West Dunbartonshire Local Development Plan.

HARDGATE HALL AND ADJACENT LAND AT GLASGOW ROAD, HARDGATE

A report was submitted by the Executive Director of Infrastructure and Regeneration provided an update on the matters detailed in the report to the November 2015 Planning Committee.

After discussion and having heard the Planning and Building Standards Manager in further explanation of the report and in answer to Members' questions, the Committee agreed:-

- (1) that no further direct action be taken;
- (2) that discussions continue between Council Officers and any prospective developers to ensure the site's long-term future; and
- (3) that an update report would be brought to Planning Committee in May.

REVIEW OF THE PLANNING ENFORCEMENT CHARTER

A report was submitted by the Head of Regeneration and Economic Development seeking approval of the Planning Enforcement Charter.

Having heard the Planning and Building Standards Manager in further explanation of the report, the Committee agreed to approve the content and the implementation of the updated Planning Enforcement Charter.

DRAFT PLANNING DELIVERY ADVICE: HOUSING AND INFRASTRUCTURE

A report was submitted by the Head of Regeneration and Economic Development informing of the content of draft Planning Delivery Advice that has been prepared by the Scottish Government.

The Committee agreed that Appendix 1 to the report be this Council's response to the draft Planning Delivery Advice consultation.

The meeting closed at 3.36 p.m.

PLANNING COMMITTEE

NOTE OF VISITATIONS – 22 FEBRUARY 2016

Attending: Keith Bathgate, Team Leader – Development Management

Apologies: Councillors Casey, McGlinchey and Rainey

SITE VISITS

Site visits were undertaken in connection with the undernoted planning applications:-

(a) Muirhouses Cottage, off Cochno Road, Hardgate

DC15/216 Siting of portacabins for use as temporary office (retrospective) at Muirhouses Cottage, off Cochno Road, Hardgate by DS Construction (Scotland) Ltd; and

DC16/013 - Erection of an agricultural building and outbuilding including associated works to form an area of hardstanding and landscaping (retrospective) at Muirhouses Cottage, off Cochno Road, Hardgate by Mr Donald Reddie.

(b) 196 Dumbarton Road, Old Kilpatrick

DC15/263 Change of use from vacant shop to hot food takeaway at 196 Dumbarton Road, Old Kilpatrick by Omar Singh Uppal.

DC15/234 - Mixed use development including residential, retail, financial/service, restaurant, public house, office, hotel, care home, health centre, assembly and leisure uses with associated car parking, access road, quay wall improvements and landscaping (Planning Permission in Principle) at Queens Quay, Cart Street by Clydeside Regeneration Limited.

MINDED TO GRANT subject to the following conditions:-

1. For the avoidance of doubt, Phase 1 works relate to any works associated with the spine road, road improvements, quay walls, public realm, linear park and pocket parks.
2. Prior to commencement of development on site approval of matters specified in conditions for the relevant development parcels shall be obtained from the planning authority.

Applications shall include:

- (a) site layout plans showing the position of all buildings, roads, footpaths, parking areas, walls, fences and landscaping;
 - (b) block and layout plans and elevations of each building, showing dimensions and palettes of external materials;
 - (c) landscape and streetscape plans showing the location and species of all proposed trees, shrubs, hedges, palettes of hard landscaping materials and street furniture;
 - (d) details of existing and proposed ground levels, and finished floor levels, relating to a clearly identified fixed datum point;
 - (e) a detailed report on the extent, scale and nature of any contamination of the site; and
 - (f) a detailed remediation scheme detailing the measures necessary to bring the site to a condition suitable for the intended use.
3. As part of any application(s) for approval of matters specified in conditions, and with regard to the requirements of condition 2 above, the design and layout of development parcels shall comply with the design principles/intents set out in sections 05 and 06 of the Design & Access Statement October 2015, and the accompanying Framework Drawing No. P(0) 003 rev E (or any subsequent amendments thereto), unless otherwise agreed in writing by the Planning Authority.

4. At the same time as the submission of the first commercial use application (excluding any district heating system) a minimasterplan shall be submitted for the mixed used area coloured yellow on Drawing No. P(0) 003 rev E (including building plots, design principles and a parking strategy) for the further approval of the Planning Authority.
5. Prior to or at the same time as the submission of the first application for the approval of matters specified in conditions for the health centre and care home (whichever comes first), a “minimasterplan” (including an integrated access and parking strategy, building design, materials, landscaping, streetscape) shall be submitted for the further approval of the Planning Authority.
6. As part of any application(s) for the approval of matters specified in conditions for Phase 1 works, and notwithstanding the requirements of condition 2c) above, details of the landscaping strategy for the spine road, linear park and pocket parks shall include:
 - (a) location and species of all proposed trees, shrubs, hedges;
 - (b) palettes of hard landscaping materials, street furniture and play equipment;
 - (c) identify potential locations for public art; and
 - (d) the means of management and maintenance of the landscaping and public open space.
7. No development (other than the spine road works, road improvement works, quay wall works, public realm works, health and care site works and investigative works, but excluding the linear and pocket parks) shall commence on site until such time as a site-wide water environment investigation and assessment has been submitted to and approved in writing by the Planning Authority. The report shall be prepared by a suitably qualified person and as a minimum shall include the following:
 - (a) Suitable and sufficient monitoring from across the site in order to identify the extent, scale and nature of contamination with regards to the water environment.
 - (b) An appropriate level of assessment that identifies the key receptors and the significance of any pollutant linkages found to be present.
 - (c) Should a significant pollutant linkage be identified on the site then a site wide preliminary remedial options appraisal is to be provided that demonstrates whereabouts on the site remediation is considered likely. Any measures identified in the report shall be implemented as approved within a timescale agreed with the Planning Authority.

8. No development (other than the spine road works, road improvement works, quay wall works, public realm works, health and care site works and investigative works, but excluding the linear and pocket parks) shall commence on site until such time as a site wide assessment of the underlying ground gas regime has been submitted to and approved in writing by the Planning Authority. The report shall be prepared by a suitably qualified person and as a minimum shall include the following:
 - (a) Suitable and sufficient monitoring from across the site in order to assess the ground gas conditions that currently exist under the site.
 - (b) A strategy confirming that and detailing how the monitoring of ground gas boreholes will continue throughout the various development phases. It should also make reference to the future method of reporting to the Planning Authority as the development progresses.
 - (c) A preliminary assessment of the implications of the existing ground gas conditions on the proposed mixed use development. Any measures identified in the report shall be implemented as approved within a timescale agreed with the Planning Authority.
9. As part of any application(s) for the approval of matters specified in conditions, Noise Impact Assessments for each development parcel shall be carried out to assess the potential impacts of noise from sources including road traffic, air traffic, plant equipment and entertainment noise and submitted for the further approval of the Planning Authority.
10. Prior to the reuse of material from the onsite spoil mounds and/or the importation of any material onto the site, details of the source of the material and associated test results to demonstrate its suitability for use shall be submitted to the Planning Authority for approval. In addition to this and in accordance with BS3882:2015, the material shall also be free from metals, plastic, wood, glass, tarmac, paper and odours associated with contaminated soils.
11. No development shall commence until the developer submits an archaeological mitigation strategy for the further approval of the Planning Authority. Thereafter the developer shall ensure that the approved strategy is fully implemented in accordance with the recommendations set out in sections 8.339 – 8.353 of the Environmental Statement and that all recording and recovery of archaeological resources within the development site is undertaken in agreement with the Planning Authority and West of Scotland Archaeology Service.
12. All applications for the approval of matters specified in conditions shall comply with the recommendations of the Flood Risk Assessment (October 2015), that is, land raising of low-lying areas of the site to above the 1 in 200 year plus climate change flood level (set at 5.1m AOD), and finished floor levels of all buildings are to be set to at least 0.6m above the 1 in 200 year plus climate

change flood level at 5.7m AOD. All development shall be implemented in accordance with these details.

13. As part of the approval of matters specified in conditions, each development parcel shall comply with the recommendations of the Drainage Impact Assessment (Rev B, October 2015) with details of the means of disposal of surface water, foul sewage and a Sustainable Urban Drainage Scheme to be submitted for the further approval of the Planning Authority.
14. The number of dwelling units consented for the site is 1,056 units. If this number is exceeded the further agreement of the Planning Authority will be required.
15. Prior to the commencement of development, a strategy detailing the implementation of community/affordable housing provision within the site shall be submitted for the further approval of the Planning Authority.
16. As part of the Phase 1 application for the approval of matters specified in conditions, a Construction and Environmental Management Plan shall be submitted for the further approval of the Planning Authority in consultation with SNH. It shall:-
 - (a) detail measures to screen the development in terms of noise and visual disturbance from the Inner Clyde SPA, Ramsar site and SSSI;
 - (b) detail measures to limit pollution to the Inner Clyde SPA, Ramsar site and SSSI;
 - (c) identify those works that are likely to have significant potential for visual and noise disturbance, such as piling. No works which are identified as likely to have a significant potential for visual and/or noise disturbance shall be carried during the main wintering period (September to early April). The Construction and Environmental Management Plan shall be implemented within a timescale agreed with the Planning Authority.
17. As part of the Phase 1 application for the approval of matters specified in conditions, a detailed Recreation and Access Management Plan which details measures to limit potential disturbance to the north shore of the Inner Clyde SPA, Ramsar site and SSSI from increased access to the river shall be submitted for the further approval of the Planning Authority and implemented within a timescale agreed with the Planning Authority.
18. As part of the Phase 1 application for the approval of matters specified in conditions, the applicant shall submit a Sustainable Transport Strategy which shall include details of:
 - (a) bus integration into the site;
 - (b) walking routes to/from the site;

- (c) location of bus stops;
 - (d) green travel plans; and
 - (e) initiatives towards encouraging bus services into the site. The recommendations of the Sustainable Transport Strategy shall require to be implemented in accordance with an agreed phasing plan within a timescale agreed with the Planning Authority.
19. As part of any application for approval of matters specified in conditions, a Travel Plan shall be submitted to and approved by the Planning Authority detailing the opportunities for sustainable travel to and from that development parcel.
20. As part of the Phase 1 application for the approval of matters specified in conditions, the following shall be included:
- (a) details of parking provision for visitors to the Titan Crane and the riverside walkway; and
 - (b) details of the new signal controlled junction and realignment of Cable Depot Road (section 9.14 of the Transport Assessment (October 2015)). These works shall be implemented as approved as part of the Phase 1 works to the site.
21. Prior to any residential, commercial or health centre uses being brought into use the works recommended in the Transport Assessment (October 2015) to realign Ailsa Road (section 9.12) and carry out layout improvements to Cart Street/Glasgow Road junction (section 9.23) shall be implemented as approved.
22. Prior to commencement of any work on the site, a Site Access and Management Plan shall be submitted providing details of the means of construction traffic entering and exiting the site. It shall include details of accesses proposed for different phases of the site and shall be implemented as approved by the Planning Authority.
23. As part of any application(s) for the approval of matters specified in conditions, parking spaces shall be provided in accordance with the Council's adopted parking standards, and no building shall be occupied until its parking facilities have been completed.
24. As part of any application(s) for the approval of matters specified in conditions, each residential unit shall be provided with a secure covered bicycle storage facility at ground floor level. Each non residential development shall have adequate secure covered cycle storage for staff in addition to adequate securable covered cycle facilities for visitors/customers.

25. The amount of retail floorspace permitted is 3,000m² (gross). Any unit trading primarily in convenience goods shall not exceed 1,000m². Any unit trading in comparison goods shall not exceed 250m². Proposals to exceed these floorspace thresholds shall be the subject of a separate planning application and retail statement for the further approval of the Planning Authority.
26. As part of any application(s) for the approval of matters specified in conditions details of soft and water landscaping works shall be submitted to and approved in writing by the Planning Authority in consultation with Glasgow Airport. Details must comply with Advice Note 3 "Potential Bird Hazards from Amenity Landscaping & Building Design". These details shall include:
- The species, number and spacing of trees and shrubs
- Details of any water features
- Drainage details including SUDS – such schemes must comply with Advice Note 6 "Potential Bird Hazards from Sustainable Urban Drainage Schemes" The scheme shall be implemented as approved.
27. Any development that would create a roof area greater than 500 square metres with a roof pitch of less than 15° shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Planning Authority in consultation with Glasgow Airport. The submitted plan shall include details of the management of the roofs within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 "Potential Bird Hazards from Building Design".

PLANNING COMMITTEE

NOTE OF VISITATION – 16 MARCH 2016

- Present:** Councillor Patrick McGlinchey
- Attending:** Karen McChesney, Lead Planner
- Apologies:** Councillors Jim Finn and John Mooney

SITE VISIT

A site visit was undertaken in connection with the undernoted planning application:-

- (a) Queens Quay, Cart Street, Clydebank

DC15/234 - Mixed use development including residential, retail, financial/service, restaurant, public house, office, hotel, care home, health centre, assembly and leisure uses with associated car parking, access road, quay wall improvements and landscaping (Planning Permission in Principle) at Queens Quay, Cart Street by Clydeside Regeneration Limited.

WEST DUNBARTONSHIRE COUNCIL

Report by Strategic Lead - Regulatory

Planning Committee: 27 April 2016

**DC16/030 Change of use from vacant office unit to hot food takeaway
at 9 Second Avenue, Clydebank by Mohammed Ashad.**

1. REASON FOR REPORT

- 1.1** This application is subject to a number of representations. Under the terms of the approved Scheme of Delegation it therefore requires to be determined by the Planning Committee.

2. RECOMMENDATION

- 2.1** **Grant planning permission** subject to the conditions set out in Section 9.

3. DEVELOPMENT DETAILS

- 3.1** The application relates to a ground floor commercial unit within a block of modern flats on the south side of Second Avenue, Clydebank. The building is three storeys in height with residential flats on the upper floors, which are accessed from a car park at the rear of the block. The application unit is one of a row of five small commercial units on the ground floor at the east end of the building, which face onto a small car park fronting Second Avenue. These units currently comprise the application site (a vacant former insurance office), a betting shop, a newsagent, a hairdresser's shop and a Chinese takeaway. There are flats on the opposite side of Second Avenue, whilst to the rear of the unit is a resident's car parking area and the bin storage area, with Singer railway station beyond.
- 3.2** It is proposed to change the use of the vacant office unit into a hot food takeaway, and to install an extraction flue at the rear of the building. It is understood that the applicant wishes to sell curry, pizzas, burgers, kebabs etc., and to operate from 4pm to 11pm daily. It is expected to employ 3 or 4 full time/part time staff, with a likelihood of additional part time staff being employed at weekends once the business is established.

4. CONSULTATIONS

- 4.1** West Dunbartonshire Council Roads Services has no objection to the proposal, despite a small parking shortfall which is discussed in Section 7 below.

- 4.2** West Dunbartonshire Council Environmental Health Service has no objection subject to conditions regarding grease traps, extraction/flue systems and noise attenuation measures.

5. REPRESENTATIONS

- 5.1** Five objections have been received, comprising four from members of the public and one from the operator of the existing hot food takeaway. The grounds of objection are summarised as follows:-

- impact of increased traffic and pressure on the existing car parking for the proposed takeaway;
- adverse impact upon amenity of neighbouring flats;
- disturbance and anti-social behaviour late into the evening;
- noise from extraction equipment;
- risk of cooking odours and smoke from the flue affecting residents;
- increased risk of fire;
- increase in litter and attraction of vermin;
- already sufficient food and drink uses in this part of Clydebank;
- negative impact on property values;
- impact upon guttering and downpipe as a result of the flue;
- impact on rear garden area of residents; and
- adverse impact on the viability of existing takeaway;

6. ASSESSMENT AGAINST THE DEVELOPMENT PLAN

West Dunbartonshire Local Plan 2010

- 6.1** The site is within an area identified as an Existing Residential Area, where Policy H5 indicates that non-residential uses may be allowed where these are ancillary or complementary to the residential area and would not result in a significant loss of amenity to surrounding properties in terms of increased traffic, noise, vibration, smell, artificial light, litter, hours of operation and general disturbance.
- 6.2** Policy GD1 requires all development to be of a high quality of design and to respect the character and amenity of the area. It sets out criteria for consideration including requiring development to be appropriate to the local area in terms of land use, layout and design and to meet the roads, parking and access requirements of the Council.
- 6.3** The impact of the proposal upon the amenity of the residential area and the suitability of its parking arrangements are discussed in Section 7 below, where it is concluded that the proposal would be in compliance with policies H5 and GD1.

7. ASSESSMENT AGAINST MATERIAL CONSIDERATIONS

West Dunbartonshire Local Development Plan (LDP) (Proposed Plan)

7.1 On 8 April 2015, the Council advertised its intention to adopt the West Dunbartonshire Local Development Plan, incorporating all of the Examination Report recommended modifications (with the exception of those relating to the inclusion of Duntiglennan Fields, Duntocher as a housing development opportunity), and thereafter advised the Scottish Ministers of this. On 2 June 2015, the Scottish Ministers wrote to the Council to ask them to consider including the Duntiglennan modifications when adopting the Plan, and directing the Council not to adopt the Plan unless the Duntiglennan modifications were included. This matter remains unresolved. However, the Council has received legal opinion that the Proposed Plan along with the Examination Report are material considerations in the determination of planning applications.

7.2 The application site is within an Existing Neighbourhood where the uses are predominantly residential, and where Policy BC4 does not permit development that would significantly harm the residential amenity, character or appearance of such areas. Policy GE1 requires all development to contribute towards creating successful places, including by avoiding unacceptable impact on adjoining uses by way of noise and smell. Policy SC3 indicates that non-retail uses within local centres will be assessed in terms of their impact upon the amenity of the centre and surrounding uses. Policy SD1 includes a requirement that development should comply with Roads Development Guidelines and relevant parking standards. As with the equivalent policies of the Local Plan, it is concluded that the proposal would comply with these policies.

Principle of Hot Food Takeaway Use

7.3 The application site is part of a small parade of local shops within a predominantly residential area. In general, hot food takeaways can be appropriate uses for local centres, provided that these do not detract from residential amenity or give rise to other unacceptable impacts, and such uses are in line with policy SC3. Many residential areas include units in tenement properties below flats, and there is already a takeaway in one of the neighbouring units which was approved as part of the original planning application for the building (permission CB88/118 dated 6th September 1988). There is therefore no reason in principle that a takeaway use would not be acceptable at this location.

Impacts on Amenity

7.4 Hot food takeaway uses have an acknowledged potential to give rise to disturbance to immediate neighbours, as such uses typically involve the coming and going of customers late into the evening with attendant noise from traffic and car doors closing etc. Customers waiting for food may stand outside smoking, and conversations can be audible to residents in nearby flats. These issues are most likely to be problematic in relatively quiet areas, (where the introduction of noisy activity will be most noticeable), or in locations where an undue concentration of late night uses may arise.

- 7.5** Whilst there is already one takeaway in the building, and there is a restaurant and a public house a short distance away on Kilbowie Road, it is not considered that this would amount to an undue concentration of food and drink uses in the vicinity of the site.
- 7.6** Concerns have been expressed by objectors about the risk of cooking odour/smoke, and of noise from extraction system. It is considered that these issues could be addressed by requiring that an extraction system of a suitable standard be provided and maintained, and the Environmental Health Service has no objection to the application on this basis. Concerns about the risk of fire, and the attraction of vermin are considered to be issues which could be addressed by suitable management/operation. With regard to concern about bin storage, the applicant has advised that the bins will be retained inside the premises and wheeled out the front of the building as and when waste collection will be required. Litter has also raised as a concern but, in practice the risk of litter from hot food takeaways tends to arise some distance from the unit itself when customers finish their meal, however a condition requiring the provision of bins close to the unit will help to address the issue of litter adjacent to the unit.
- 7.7** Concern has also been raised about the visual impact of the flue upon the building. Whilst the building's main frontage is onto Second Avenue, the entrances to the flats are from onto the car parking/landscaped area at the rear, and the building has been designed to present an attractive frontage onto this area. The proposed flue would not be an attractive feature, but it would be sited alongside a projecting gable feature and would not be prominent except when viewed from directly in front of it. It is also proposed to paint the flue a suitable colour to improve its appearance, rather than leaving it as plain galvanised steel. On this basis it is considered that the appearance of the flue would be acceptable. Concerns about damage to guttering etc. as a result of the installation of the flue would be a private legal matter between the various property owners.

Parking and Road Safety Issues

- 7.8** The Council's parking standard for hot food takeaway uses requires the provision of 5 off-street parking spaces. The premises currently have 12 shared parking for all 5 commercial units, which represents a shortfall in overall provision given that one of the units is already a takeaway. However, the demand for parking will vary between the units over different times of the day, and peak demand for the takeaway is likely to be in the evening when some of the other units are closed. Although there is high demand for on-street parking in Second Avenue due to the flats opposite having no dedicated parking, the Roads Service considers that the impact on parking in the vicinity would be minimal, and there should be no adverse effect upon road safety.

8. CONCLUSION

- 8.1** The proposed takeaway use would comply with relevant policies and is appropriate for this neighbourhood centre. It is considered that its impact upon amenity, parking and road safety would be acceptable.

9. CONDITIONS

- 1. Prior to the commencement of development on site details of an adequate sized grease trap shall be submitted to and approved by the Planning Authority in consultation with Environmental Health and thereafter it shall be installed prior to the takeaway being operational and maintained thereafter.**
- 2. Prior to the commencement of development on site, details of the specification of the flue system/extraction system shall be submitted to and approved by the Planning Authority. The submitted details shall include the noise output and filter system, and the external finish of the flue. The approved flue/extraction system shall be implemented prior to the takeaway being operational and shall be maintained thereafter.**
- 3. Prior to the commencement of development on site, litter bins shall be provided to the front of the unit. Details of their location and design shall be submitted to and approved by the Planning Authority and shall be erected on site prior to the takeaway being operational.**

Peter Hessett
Strategic Lead - Regulatory
Date: 7 April 2016

Person to Contact: Pamela Clifford, Planning & Building Standards Manager,
email: Pamela.Clifford@west-dunbarton.gov.uk

Appendix: None

Background Papers:

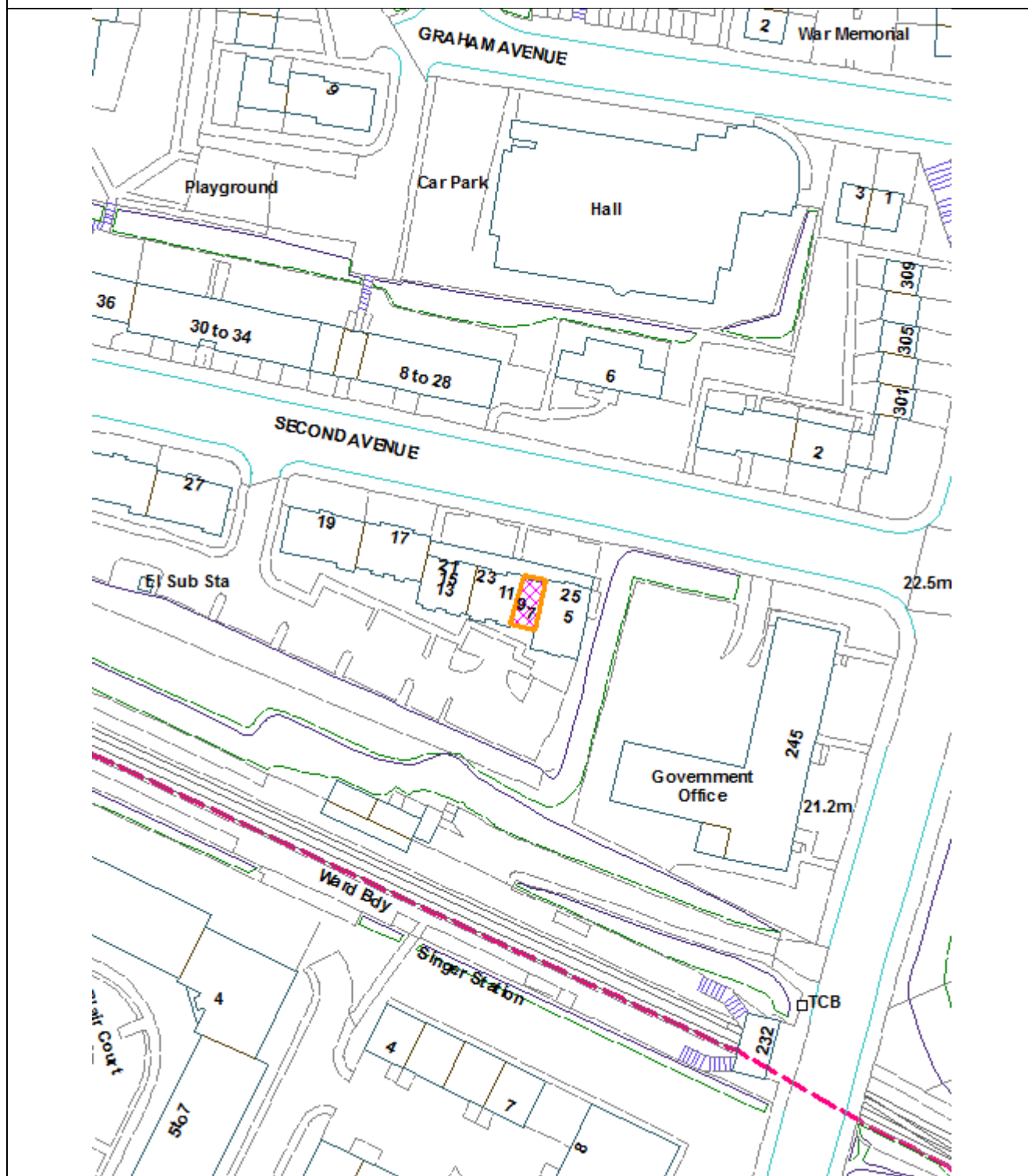
1. Application forms and plans.
2. West Dunbartonshire Local Plan 2010
3. West Dunbartonshire LDP Proposed Plan
4. Consultation Responses
5. Representations

Wards affected: Ward 4 (Clydebank Central)

DC16/030

Change of use from shop
to hot food takeaway and
the installation of a flue on
the rear elevation

9 Second Avenue
Clydebank
G81 3BD



WEST DUNBARTONSHIRE COUNCIL**Report by the Strategic Lead - Regulatory****Planning Committee: 27 April 2016**

**DC16/007 Change of use to dance studio at Unit 14, The Griffon
Centre, Levenside Road, Vale of Leven Industrial Estate,
Dumbarton by Miss Lindsey Donald**

1. REASON FOR REPORT

- 1.1** This application is considered to raise issues of local significance, and under the terms of the approved Scheme of Delegation it requires to be determined by the Planning Committee.

2. RECOMMENDATION

- 2.1** **Refuse** planning permission for the reasons set out in Section 9.

3. DEVELOPMENT DETAILS

- 3.1** The application relates to a vacant industrial unit measuring 140 square metres in floor area, which is within the Vale of Leven Industrial Estate. The predominantly single storey, brick building is part of a larger building that was once part of the former Westclox clock factory complex, but which is now divided into a number of units containing a mixture of various industrial and business uses. To the front of the application unit there is a service/access road and large communal car park shared by various nearby businesses. Although the building in which the unit is located is mostly single storey in height, the application unit has two small rooms at first floor level, which are currently used for storage, while the ground floor is divided into two rooms and also has welfare facilities. It is understood that the building has been vacant for 9 months, prior to which it was last used as a quilting/social craft workshop by the Loch Lomond Quilt Show.
- 3.2** The Vale of Leven Industrial Estate contains over 100 businesses and is a Proposed Business Improvement District (BID), which is a business-led initiative to improve the location as a commercial environment and to encourage investment to secure the future of the estate as a successful business area.
- 3.3** It is proposed to change the use of the unit from industrial to a dance studio (Use Class 11- Assembly and Leisure). There would be no external changes to the building, and the existing parking and access arrangements would remain. Internally, there would be a basic refurbishment and the existing

partition wall dividing the space on the ground floor would be replaced with a sliding partition that would allow the room to be divided into two rooms or used as one larger room depending on requirements. The applicant also intends to use part of the upper floor to manufacture dancewear. The dance studio would provide a range of dance classes for adults and children typically six days a week (Monday to Saturday, but occasionally on Sundays too if required), and fitness classes for adults five days a week. Typical opening times would be 9am to 9pm, but earlier classes starting at 6am may be offered if there was demand. It is expected that three full-time members of staff would work at the dance studio. The applicant has operated their business for around 4 years and during that time it has operated from a number of different premises in Dumbarton and Alexandria due to building closures which have required the business to relocate. Until recently the dance studio operated from the hall of Dumbarton Baptist Church, but had to vacate these premises due to the sale of that building. The applicant currently runs their dance studio from another church hall in Dumbarton, however, the present hall is only available to them for a limited number of hours and the business is therefore seeking its own premises.

4. CONSULTATIONS

- 4.1** West Dunbartonshire Council Roads Service has no objections to the proposed use.

5. REPRESENTATIONS

- 5.1** No representations have been received.

6. ASSESSMENT AGAINST THE DEVELOPMENT PLAN

West Dunbartonshire Local Plan 2010

- 6.1** The Vale of Leven Industrial Estate is designated as an Industrial and Business Use site, where Policy LE1 applies. There is a presumption in favour of uses which positively extend the permanent employment potential of such sites, although the policy does allow for the reuse of existing industrial or business class sites for suitable alternative uses where this can be justified against such criteria as: specific locational need, there being no adverse impact on the industrial land supply, lack of suitable alternative locations, economic and environmental benefits, the impact on the attractiveness of the location to industrial and business investment and there being no adverse effect on local infrastructure.
- 6.2** The Vale of Leven Industrial Estate is also designated as a Strategic Industrial and Business Location. Policy LE6 indicates that the industrial estate is strategically important as a location for industrial, business and warehousing uses. Sites within the industrial estate will be safeguarded for economic development uses and there shall be a strong presumption against uses other

than for business and industry. The proposal would result in the use of the premises for non-industrial purposes, and is therefore contrary to Policy LE6 and this is discussed below. However, the Strategic Industrial and Business Location designation was based on a previous Glasgow and the Clyde Valley Structure Plan and is not included in the more recent Strategic Development Plans.

7. ASSESSMENT AGAINST MATERIAL CONSIDERATIONS

West Dunbartonshire Local Development Plan (LDP) Proposed Plan

- 7.1** On 8 April 2015, the Council advertised its intention to adopt the West Dunbartonshire Local Development Plan, incorporating all of the Examination Report recommended modifications (with the exception of those relating to the inclusion of Duntiglennan Fields, Duntocher as a housing development opportunity), and thereafter advised the Scottish Ministers of this. On 2 June 2015, the Scottish Ministers wrote to the Council to ask them to consider including the Duntiglennan modifications when adopting the Plan, and directing the Council not to adopt the Plan unless the Duntiglennan modifications were included. This matter remains unresolved. However, the Council has received legal opinion that the Proposed Plan along with the Examination Report is material considerations in the determination of planning applications.
- 7.2** The Vale of Leven Industrial Estate is identified along with the adjoining Lomondgate as a Changing Place in the Proposed Plan. The strategy for this Changing Place supports the enhancement of existing properties within the Vale of Leven Industrial Estate. The Plan recognises issues with the condition and maintenance of premises and the green network within the industrial estate. It states that proposals for uses other than Use Class 4, 5 & 6 are not encouraged within the industrial estate and will be assessed against Policy GE2. The industrial estate is designated as part of the Lomondgate Strategic Economic Investment Location (SEILs), which is considered to offer investment opportunities for the key sectors of business and financial services, creative and digital industries and tourism. However, the Plan recognises that the SEIL designations cover large areas and uses will not be restricted to these key sectors. Policy GE2 states that development of Use Classes 4, 5 and 6 uses will be supported within existing business and industrial areas. Proposals for alternative uses will be assessed with regard to impact on the operations of existing uses in the area; impact on the suitability of the area for future industrial and business investment; impact of availability of land and buildings for business, industry or storage and distribution uses; the availability of other locations for the proposed use; and the positive contribution the proposed use can make to the area.
- 7.3** Policy DS1 has regard to all development and expects development to contribute towards creating successful places by having regard to the six qualities of a successful place: Distinctive, Adaptable, Resource Efficient, Easy to get to/Move around, Safe and Pleasant, and Welcoming. These

issues are considered below, and it is considered that the proposal is contrary to Policies GE2 and DS1.

Impact on Industrial Land Supply

- 7.4** The applicant has confirmed that the unit has been vacant for approximately 9 months, prior to which it was last used as a small craft workshop by a community group. There are other vacant units within the estate, and the uncertain future of the Polaroid building following the announcement of the closure of Polaroid, the loss of this unit would not have a significant impact on industrial land supply.

Impact on Neighbouring Industrial Units

- 7.5** The unit is located in an area of the industrial estate where there is a mixture of business/ industrial uses, as well as indoor football pitches and a café. These units are sited around a central car parking area although to the north of the unit is industrial/haulage uses such as a bus operator, haulage company and a vehicular salvage company. Such uses by their nature generate high volumes of traffic and require unobstructed access to their premises. The service road to the central car parking area is used by these heavy vehicles, as well as other vans and service vehicles servicing the other business /industrial uses in the vicinity. Furthermore, the Council have their own plans to locate a super depot in the Industrial Estate for their own operations and they are also working with a number of other future occupiers to bring haulage/ industrial uses to the industrial estate.
- 7.6** The use of the unit as a dance studio would introduce groups of children coming and going, many of whom would probably be dropped off and picked up by car as the site is not easily accessible by public transport and is unattractive to access with/by children on foot. It is considered that the operation of a dance studio focussed on children's classes would introduce a potentially dangerous conflict between uses and detract from the viability or operational convenience of the surrounding industrial units. Consideration also has to be given to the impact the development may have on attracting Use Class 5 & 6 uses to adjoining units in the future i.e. the uses that the area is identified in the Local Development Plan for. Investors may not want to operate in close proximity to a children's dance school.

Locational Need/Alternative Locations

- 7.7** The dance studio has moved premises several times over the last four years due to building closures, and is now looking for a more permanent base to provide some long-term security for the business. The applicant has explored several other options for premises over the last two years; however, they have struggled to find suitable accommodation due to high rents and other businesses being preferred as tenants. The use requires a space that is available for most of the day, six days per week at an affordable cost. The applicant has looked into numerous other properties, including space within the Artizan Centre in Dumbarton town centre, but development and rent costs for units at that location were out with the budget of the business. The applicant had discussions with the Council's Asset Management section regarding Council properties, but none of these proved to be suitable, and the

various other church halls, community centres etc. which were considered could not offer the space or amount of time required. The business requires being located within the Dumbarton/Alexandria area in order to continue to serve its existing customer base. The applicant therefore submits that they have fully explored alternative locations within this area, but that no more suitable location is available.

Social/Economic Benefits

- 7.8 The applicant has indicated that the proposed dance studio would be a complementary use within the industrial estate which would promote health and wellbeing at work by providing a place for persons working in the estate to exercise. It is often accepted that non industrial uses which complement the industrial uses are acceptable in an industrial estate such as a gym, child care facilities. In this instance, whilst there may be some use by local workers it is considered likely that most of those attending classes at the dance studio are likely to be children or adults who have no other reason to visit the industrial estate.

8. CONCLUSION

- 8.1 The proposed use is contrary to the industrial policies of both the adopted Local Plan (Policy LE1 and LE6) and the West Dunbartonshire Local Development Plan Proposed Plan (Policy GE2) which safeguards the area for business and industrial uses. The use cannot be justified as an alternative use as it would have an impact on adjacent uses and would make the Vale of Leven a less suitable location for future investment. Whilst the applicant has investigated a comprehensive list of alternative premises it is considered in this instance that the Vale of Leven is not the correct location for a dance studio.

9. REASONS

1. **The proposed use would be contrary to Policies LE6 of the West Dunbartonshire Local Plan 2010 where there is a strong presumption against uses other than business and industry and it cannot be justified against the criteria of Policy LE1.**
2. **The Vale Of Leven Industrial Estate is identified as a Strategic Economic Location (SEILs) and is safeguarded for business, industrial storage and distribution uses in terms of Policy GE1 and it cannot be justified in terms of the criteria of Policy GE2 of the West Dunbartonshire Local Development Plan Proposed Plan.**

Peter Hessett
Strategic Lead Regulatory
Date: 11 April 2016

Person to Contact: Pamela Clifford, Planning & Building Standards Manager,
Housing, Environmental and Economic Development,
Aurora House, 3 Aurora Avenue, Queens Quay,
Clydebank, G81 1BF.
0141 951 7938
email: Pamela.Clifford@west-dunbarton.gov.uk

Appendix: None

Background Papers:

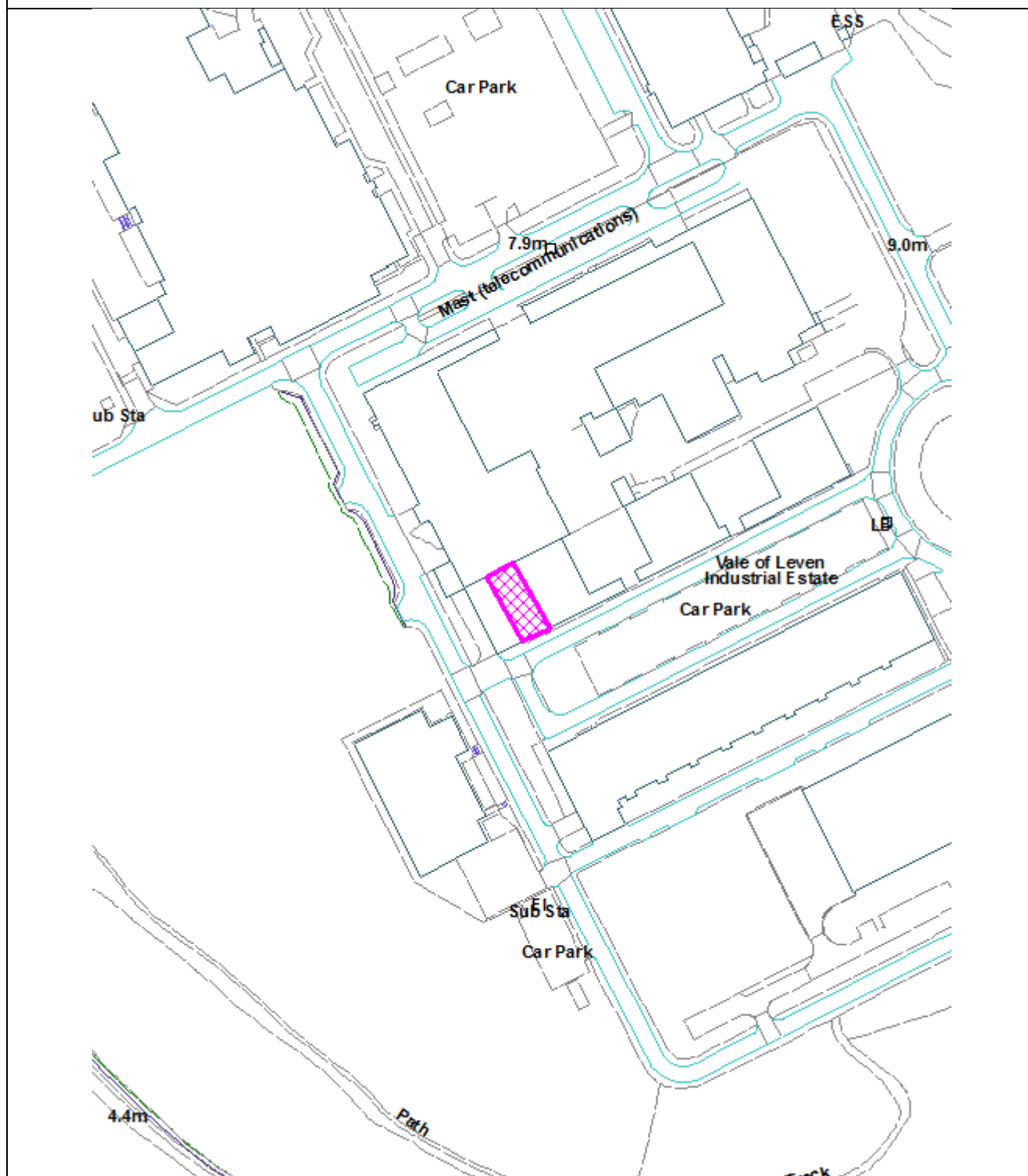
1. Application documents and plans
2. West Dunbartonshire Local Plan 2010
3. West Dunbartonshire LDP - Proposed Plan
4. Consultation responses

Wards affected: Ward 2 (Leven)

DC16/007

Change of Use to Dance
Studio

Unit 14
The Griffon Centre
Levenside Road
Vale Of Leven Industrial Estate
Dumbarton
G82 3PD



WEST DUNBARTONSHIRE COUNCIL**Report by the Strategic Lead - Regulatory****Planning Committee: 27 April 2016**

Subject: Planning Guidance on Pay Day Lending and Betting Shops**1. Purpose**

- 1.1** To seek approval of draft Planning Guidance on Pay Day Lending and Betting Shops for publication.

2. Recommendation

- 2.1** It is recommended that the Committee approves Appendix 1 as draft Planning Guidance on Pay Day Lending and Betting Shops and that it is published for consultation.

3. Background

- 3.1** The Scottish Government Circular on Development Planning advises that local authorities may issue non-statutory planning guidance. This may be used to provide detail on a range of subject areas, and is particularly useful when an issue arises during the lifecycle of a Development Plan, and there is not the appropriate hook in the Plan to allow statutory Supplementary Guidance to be prepared. Non-statutory planning guidance does not form part of the Development Plan, but may be a material consideration in terms of considering a development proposal.

4. Main Issues

- 4.1** Over recent years, concerns have been expressed by the Council and communities about the number and clustering of pay day lending and betting shops within the West Dunbartonshire area. On a number of occasions the Planning Committee have refused applications for such uses, only for these decisions to be overturned at appeal.
- 4.2** There have also been concerns expressed from within the Scottish Government about betting 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. In June 2014 a revised Scottish Planning Policy was published which reflected concerns about the number and clustering of betting offices and high interest money lending premises in town centres.
- 4.3** As part of its Town Centres Planning Pilot, the Scottish Government supported the Council to prepare Planning Guidance to address the clustering

of pay day lending and betting shops. Draft guidance has now been prepared and is set out in Appendix 1 for approval.

- 4.4** The guidance applies to the core retail areas of Clydebank and Dumbarton town centre only, where Local Development Plan Policy SC2 applies, which seek to manage the change of use of Class 1 retail uses to other uses. Having this tie-in to the Local Development Plan will strengthen the status of the guidance. It is understood that Members may like to see the guidance applied more widely. However following consultation and an assessment of the pilot, there may be scope to apply similar guidance to wider areas in the future.
- 4.5** The guidance has been prepared in order to strengthen the Council's position in assessing whether such uses are appropriate in that particular location. It will also provide an evidence for appeal decisions.
- 4.6** In preparing the guidance, two surveys were undertaken:
- A survey of the Councils' Citizen's Panel in respect of their attitudes towards pay day lending and betting office premises. This received 1,028 responses and was supplemented by two focus groups, one in Clydebank and one in Dumbarton.
 - 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.
- Reference is also included in the guidance to research undertaken by the Royal Society for Public Health entitled 'Health on the High Street'.
- 4.7** These surveys contribute to an evidence base within the guidance which demonstrates:
- An apparent association between areas with poorer socio-economic indicators and a higher number of betting shops.
 - That a significant majority of the Citizen's Panel felt there were too many pay day lending and betting shops in Clydebank and Dumbarton town centres, and very few respondents felt these uses contributed to vitality/vibrancy of the centres.
 - Pay day lending/pawnbroking uses attract very few customers to the town centre in comparison to other uses.
 - Betting shops compare well to other uses in terms of how many customers they attract during the daytime, but the evidence that they increased evening activity was mixed.
 - There was concern amongst Citizen's Panel respondents about the impact of pay day lending and betting shop uses on community well-being.

Next Steps

- 4.8** The guidance will be graphically improved and then published for a consultation of at least 4 weeks. This will include seeking the views of local communities, the Scottish Government and industry bodies. Comments

received will be reported back to Committee along with a proposed finalised version of the guidance.

5. People Implications

5.1 There are no personnel issues associated with this report.

6. Financial Implications

6.1 There are no financial issues associated with this report.

7. Risk Analysis

7.1 It was not considered necessary to carry out a risk assessment on the matters covered by this report.

8. Equalities Impact Assessment (EIA)

8.1 A screening has been undertaken and no equalities issues have been identified.

9 Strategic Environmental Assessment

9.1 A pre-screening notification has been sent to the SEA Gateway. However, the guidance is not considered to have any significant environmental impacts, so it is not anticipated that an SEA will be required.

10. Consultation

10.1 The views of the Council's Citizen's Panel were sought during the preparation of the guidance. The draft guidance will now be consulted more widely on before being brought back to Committee for approval.

11. Strategic Assessment

11.1 The guidance is considered to support the Council's strategic priority of improving the well-being of communities and protecting the welfare of vulnerable people.

Peter Hessett
Strategic Lead - Regulatory
Date: 11 April 2016

Person to Contact: Pamela Clifford, Planning & Building Standards Manager,
pamela.clifford@west-dunbarton.gov.uk
0141 951 7938

Alan Williamson, Team Leader – Forward Planning,
alan.williamson@west-dunbarton.gov.uk
0141 951 7948

Appendices: Appendix 1 – Draft Planning Guidance on Pay Day
Lending and Betting Shops

Background Papers: None.

Wards Affected: Ward 3 – Dumbarton
Ward 6 – Clydebank Waterfront

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 well-being 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 well-being.

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; or 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.

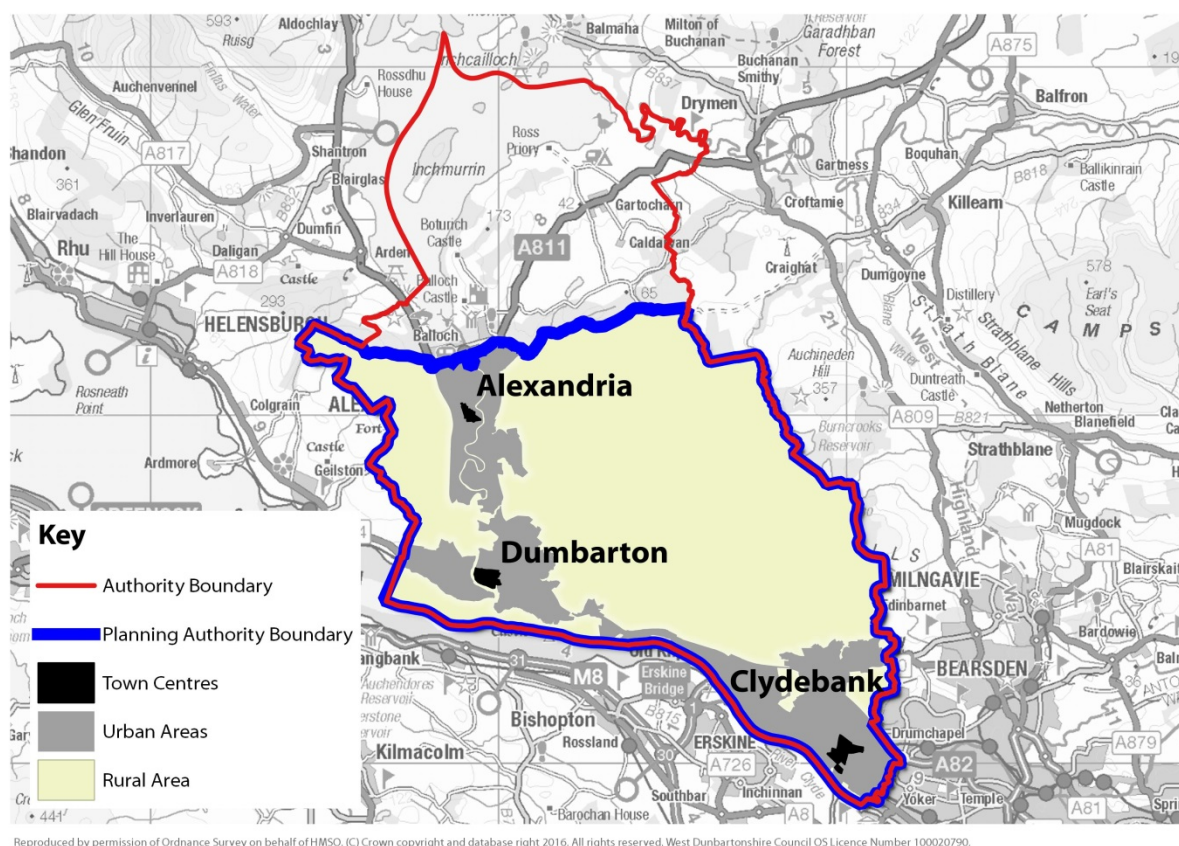
West Dunbartonshire: profile and vulnerability to gambling and high interest debt

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 datazones¹. Table 1 provides further evidence that West Dunbartonshire compares poorly to the Scottish average when considering employment, benefits and earnings data.

¹ <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 |
|--|----------------------------|-----------------|
| Economically Active – % of residents aged 16-64 | 73.2% | 77.8% |
| Unemployment - % of economically active residents | 7.7% | 6.0% |
| Long-term sick - % of economically inactive | 40.7% | 26.3% |
| Earnings per residence | £500.30/week | £527.00 |
| Out-of-work benefits – % of residents aged 16-64 claiming Job Seekers Allowance | 2.8% | 1.7% |
| Benefit claimants – % of residents aged 16-64 | 20.1% | 14.2% |

Figures derived from www.nomisweb.co.uk, February 2016

Commissioned by the Responsible Gambling Fund, research prepared by Geofutures and the National Centre for Social Research² 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 Zone³ - 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-groups⁴. 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.

² 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

³ Ibid., p.55.

⁴ 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, February 2016.
Original source is 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 well-being 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 well-being.

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 3 and 4 highlight betting offices and pay day lending premises in Clydebank and Dumbarton town centres, and those premises with planning permission to change to these uses as at April 2015.

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.

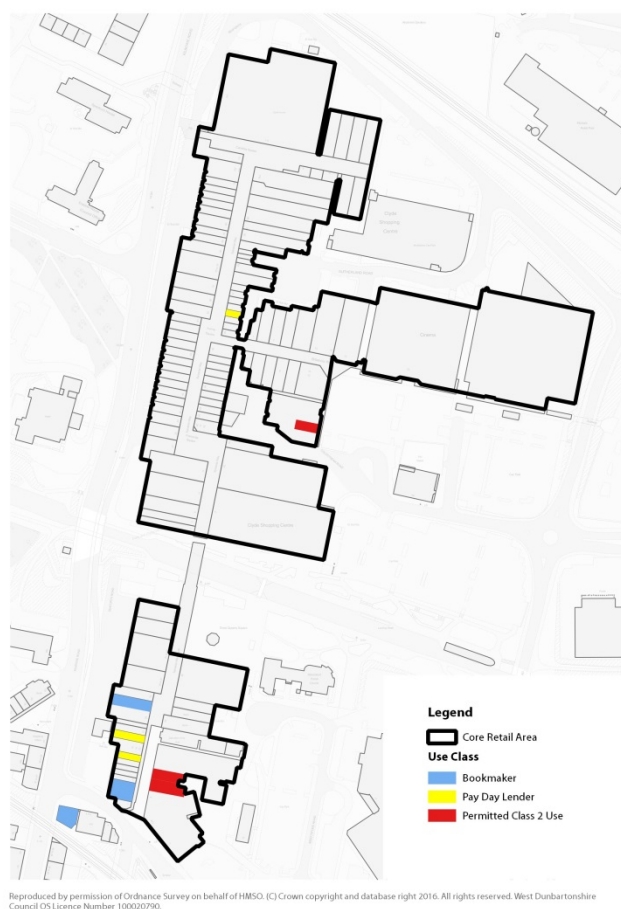
Table 3 details the number of betting shops and premises offering high interest lending in Clydebank town centre. Pay day lending and gambling uses are clustered on Sylvania Way South, where there are 2 betting shops and 3 premises offering high interest lending. There is also an amusement arcade on 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

| | Betting Shop premises | High-interest lending premises |
|------------------------------|----------------------------------|---|
| Clydebank Town Centre | 3 | 4 |

Map 3 - 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 are 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.

| | Betting Shop premises | High-interest lending premises |
|------------------------------|------------------------------|---------------------------------------|
| Dumbarton Town Centre | 3 | 2 |

Map 4 - Dumbarton Town Centre



Reproduced by permission of Ordnance Survey on behalf of HMSO. (C) Crown copyright and database right 2016. All rights reserved. West Dunbartonshire Council OS Licence Number 100020790.

Survey work and literature review

(The published version of this Guidance will display a selection of the statistics and quotes included below graphically)

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 clearly a 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 the 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 societyI had a friend who went to the bookies each morning...then came home and spent the afternoon watching the races on the 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.

Only 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 Clydebanks (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 well-being. 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 well-being 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 well-being of the community.

At the focus group, comments on the community well-being 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 well-being 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).

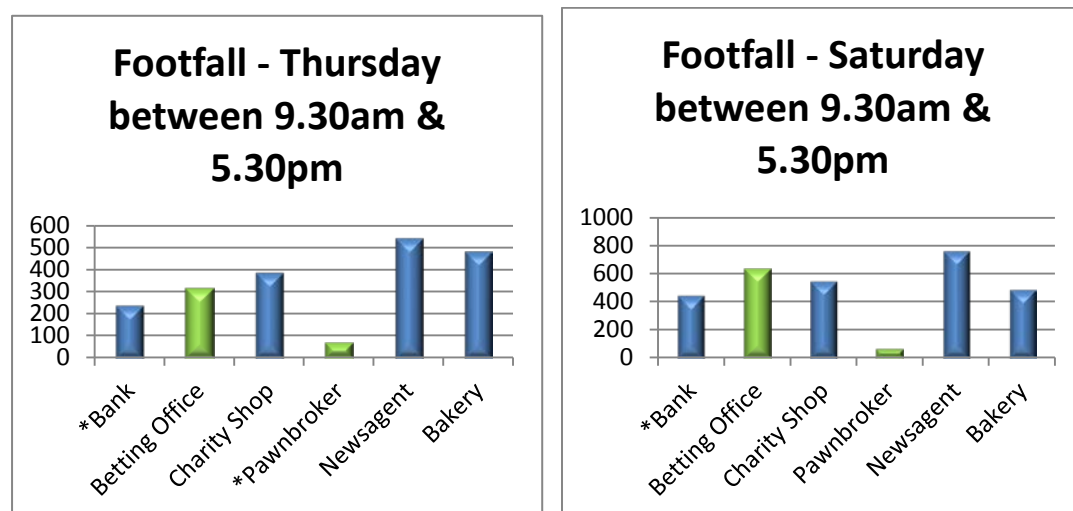
Customer/footfall counts

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.

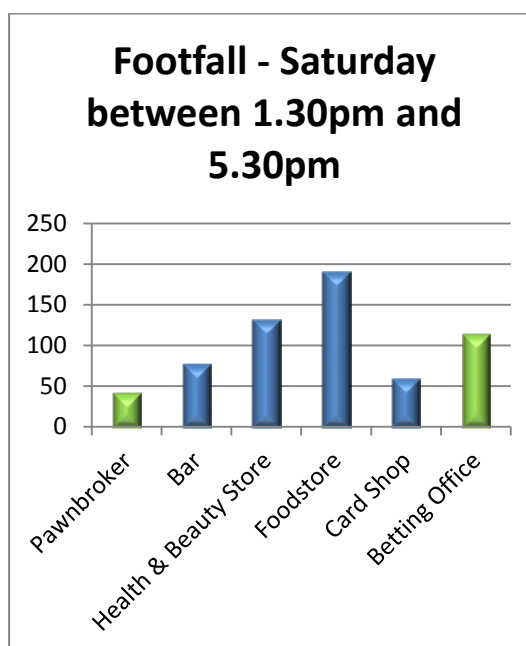
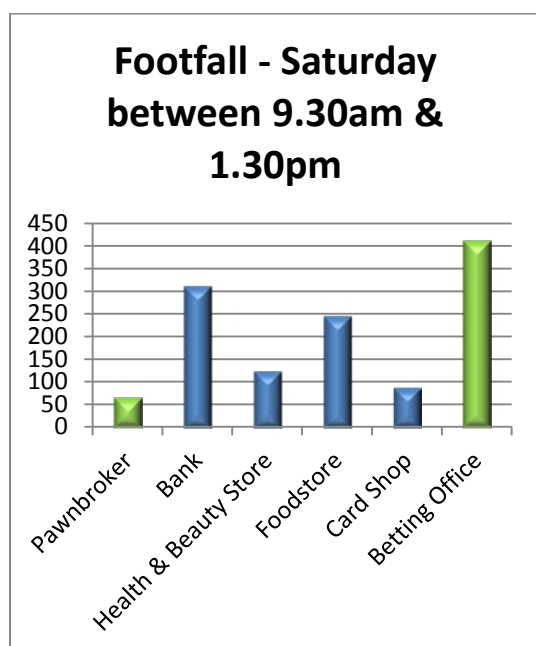
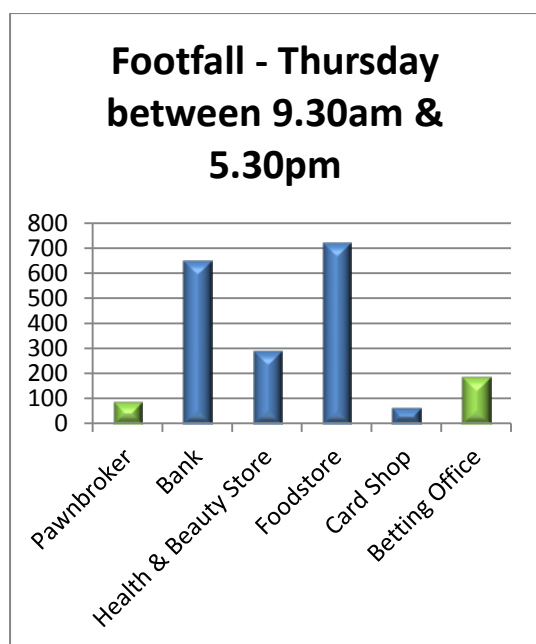
The purpose of the survey was to gain an understanding of how many customers uses such as pay day lending and betting shops attracted to the town centres in comparison to other uses.

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



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'⁵ 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.

⁵ Royal Society for Public Health, 2015. *Health on the High Street*.

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 well-being 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 well-being

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 well-being.

There is sufficient evidence for community well-being 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 well-being.

Supplementary Guidance on Pay Day Lending and Betting Offices Premises

Citizens' Panel Research Report

by



For further information contact:

Jim Patton

Director

Hexagon Research and Consulting

Suite 401

47 Timber Bush

Edinburgh

EH6 6QH

Tel: 0131 669 9574

e-mail: jim@hexagonresearch.co.uk

September 2015

Contents

| | Page |
|--|---------------|
| 1. Introduction | 3 |
| 2. Background and Objectives | 4 |
| 3. Our Approach | 6 |
| 4. The Importance of a vibrant town centre | 8 |
| 5. Pay day lenders | 16 |
| 6. Betting offices | 21 |
| 7. The number and clustering of pay day lenders and betting offices in town centres | 25 |
| 8. Concluding Comments | 32 |
| Appendix 1: The West Dunbartonshire Citizens' Panel | 33 |
| Appendix 2: Focus group discussion guide | 37 |
| Appendix 3: Survey questions | 41 |

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

2. Background and Objectives

A recent report on pay day lending and gambling in Scottish town centres and neighbourhoods¹ 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 report² 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.

¹ 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.

² 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.

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 24th July 2015.

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

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

| | West Dunbartonshire | Dumbarton | Clydebank | Alexandria |
|-----------------|--------------------------------|------------------|------------------|-------------------|
| 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.

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.

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.

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 | 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% |

‘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

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%)

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/museums/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% |

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

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

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.

Do you agree or disagree with the following statements about pay day lender/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 | 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% |

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

| | Dumbarton | Clydebank | Alexandria |
|--|------------------|------------------|-------------------|
| 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.

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

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

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)

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

| | Strongly agree | Agree | Disagree | Strongly disagree | Don't know |
|--|-----------------------|--------------|-----------------|--------------------------|-------------------|
| 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% |

Agreement with statements about betting shops

| | Dumbarton | Clydebank | Alexandria |
|--|------------------|------------------|-------------------|
| 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

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

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

Supplementary Guidance on Pay Day Lending and Betting Offices Premises

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

| | Strongly agree | Agree | Disagree | Strongly disagree | Don't know |
|--|----------------|-------|----------|-------------------|------------|
| 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.

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

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.

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

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

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

Appendix 1

West Dunbartonshire Citizens' Panel

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

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)

Supplementary Guidance on Pay Day Lending and Betting Offices Premises

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).

Appendix 2

Focus group discussion guide

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>How often do you visit your town centre?</p> <p>What do you visit the town centre for?</p> <p>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?</p> <p>Why do you say that? <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>What are the characteristics you would associate with a good town centre? <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>What are the characteristics you would associate with a town centre that was not good? <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> |

| | |
|-------------------------|---|
| Rating your town centre | <p>Overall, how would you rate your town centre on these characteristics?</p> <p>What do you regard as the best aspects of your town centre?</p> <p>What do you regard as the worst aspects of your town centre? <i>Prompt:</i> <i>Clustering of PDLs and BOs</i></p> |
| PDLs | <p>What are your views on the presence of PDLs in your town centre? First of all, your positive views.</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>Have you any negative views on the presence of PDLs in your town centre? <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>What are your views on the presence of BOs in your town centre? First of all, your positive views.</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>Have you any negative views on the presence of BOs in your town centre? <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> |

| | |
|----------------------------|---|
| Clustering of PDLs and BOs | <p>Do you think that allowing more properties to change their use to become PDLs or BOs would affect the town centre?</p> <p>In what way?</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>To what extent would you say you were concerned about the clustering of PDLs and BOs in your town centre?</p> <p>Overall, do you think action is needed to curtail the number and clustering of PDLs and BOs in your town centre?</p> <p>What steps do you think should be taken?</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> |

Appendix 3 Survey Questions

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

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 |

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 |

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 |

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 |

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 |

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.

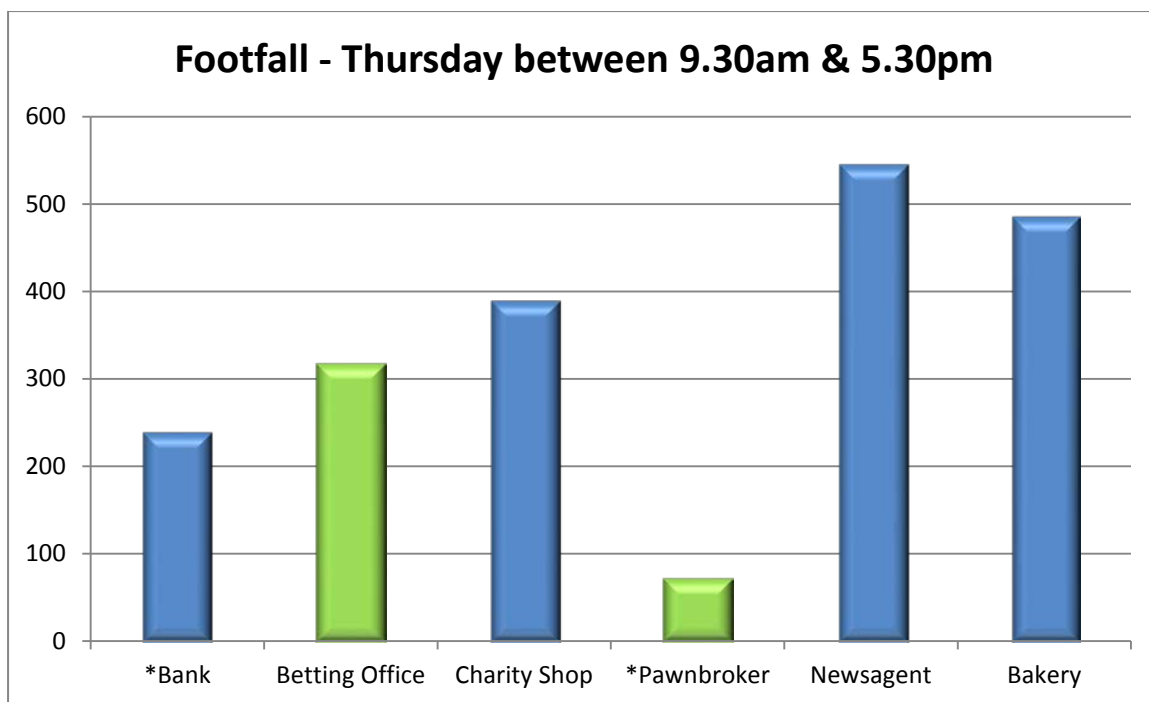
A further evening count of the betting offices was undertaken to gauge footfall coming into the centre after normal shop opening hours.

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).



¹Figure 1

*Bank and Pawnbroker closed during last hour of count (4.30pm – 5.30pm).

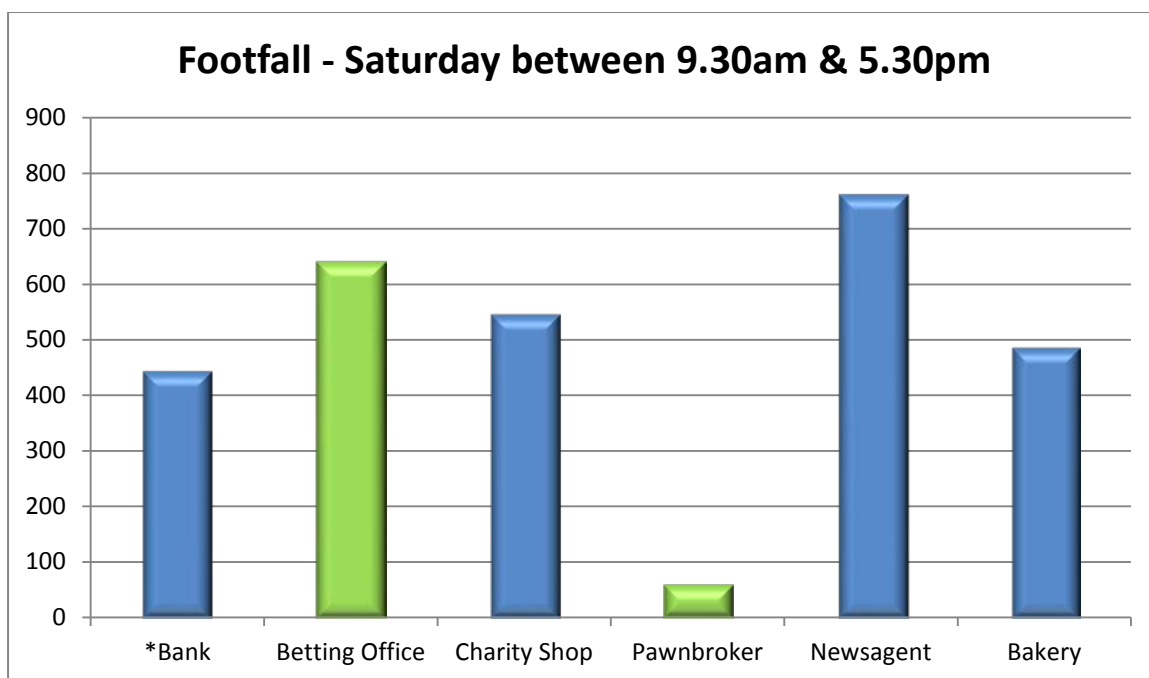


Figure 2

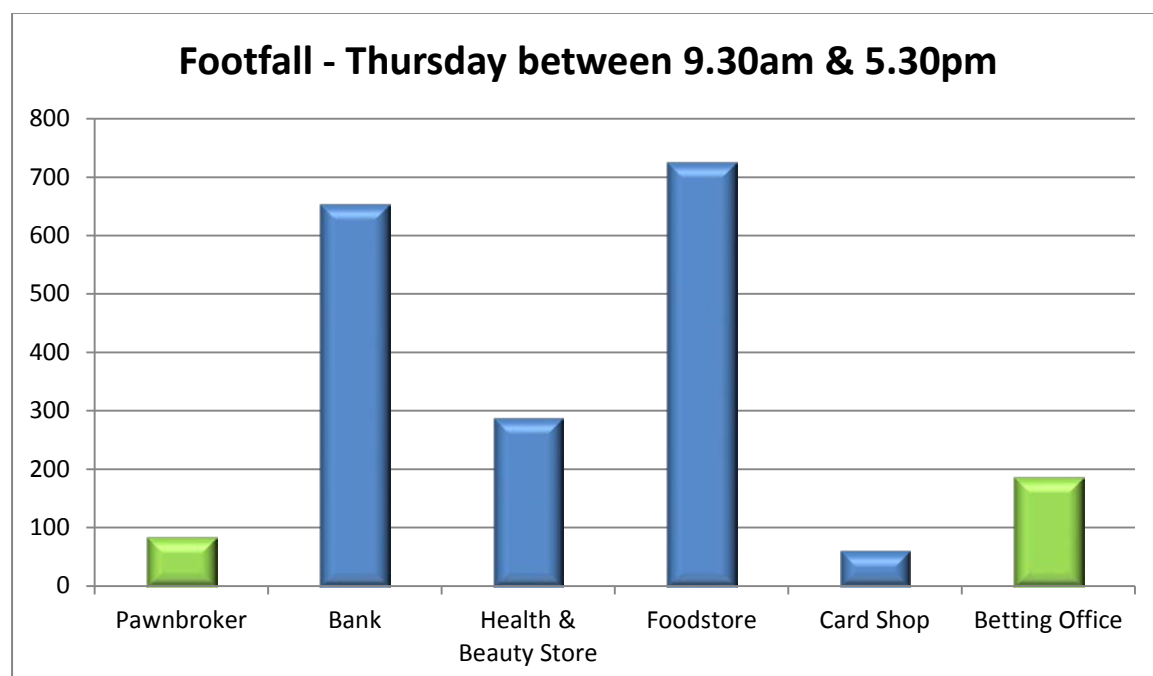
*Bank closed during last two hours of count (3.30pm – 5.30pm).

¹ 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 fared the busiest with higher footfall than the other units surveyed. In the afternoon this dropped to the third highest footfall.

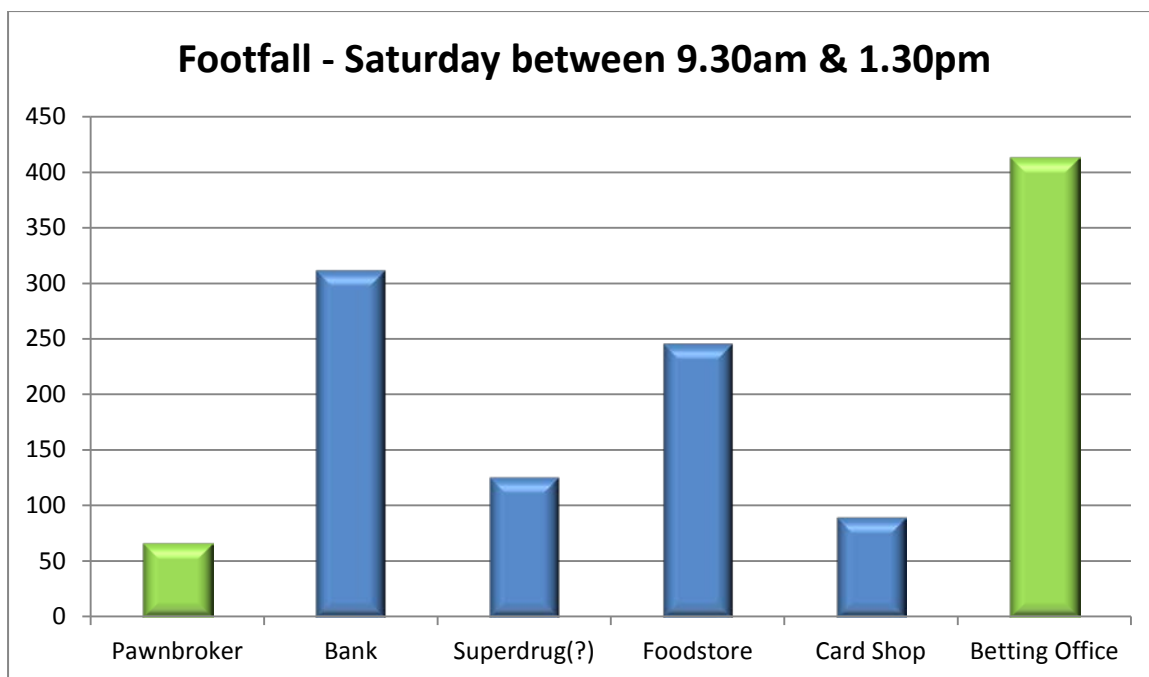
The pawnbroker took the second lowest footfall on Thursday with only the card shop taking less. On Saturday the pawnbroker had the lowest footfall for both morning and afternoon.

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.



²Figure 3

² Results have been weighted to reflect an average count for the day.



³Figure 4

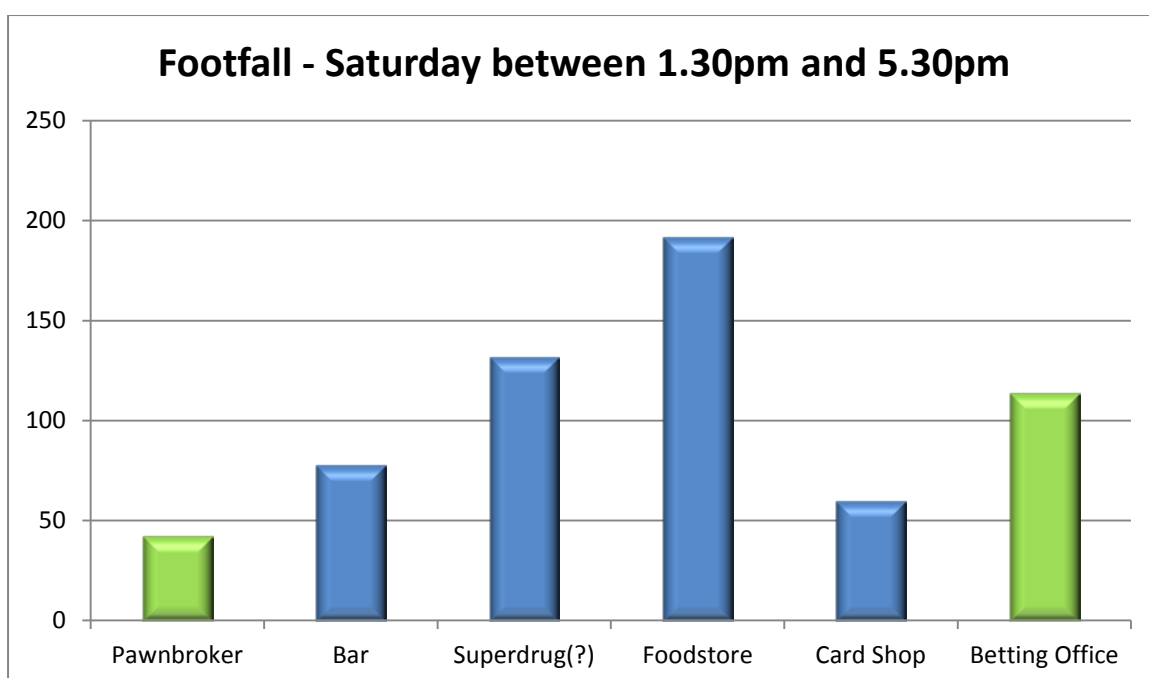


Figure 5

³ 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

Weather conditions: Good, light

Evening Count

| Time | Unit | Tally |
|-------------|-------------|-------|
| 17.30-18.00 | Ladbrokes | 9 |
| 18.00-18.30 | Paddy Power | 10 |
| 18.30-19.00 | Ladbrokes | 3 |

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: 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: 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: 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 |

Dumbarton Saturday 19th September

Weather conditions: Cloudy

Hour: 9.30 - 10.30

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

Hour: 10.30 - 11.30

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

Hour: 11.30 - 12.30

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

Hour: 12.30 - 13.30

| Unit | Tally |
|----------------------|-------|
| Ramsdens | 4 |
| Bank of Scotland | 5 |
| Superdrug | 5 |
| Ladbrokes | 8 |
| Farmfoods | 13 |
| Hallmark & Thorntons | 2 |

Hour: 13.30 - 14.30

| Unit | Tally |
|----------------------|-------|
| Ramsdens | 5 |
| Burgh Bar | 3 |
| Superdrug | 3 |
| Wm Hill | 8 |
| Farmfoods | 12 |
| Hallmark & Thorntons | 0 |

Hour: 14.30 - 15.30

| Unit | Tally |
|----------------------|-------|
| Ramsdens | 0 |
| Burgh Bar | 3 |
| Superdrug | 10 |
| Ladbrokes | 6 |
| Farmfoods | 4 |
| Hallmark & Thorntons | 5 |

Hour: 15.30 - 16.30

| Unit | Tally |
|----------------------|-------|
| Ramsdens | 2 |
| Burgh Bar | 5 |
| Superdrug | 5 |
| Ladbrokes | 1 |
| Farmfoods | 9 |
| Hallmark & Thorntons | 4 |

Hour: 16.30 - 17.30

| Unit | Tally |
|----------------------|-------|
| Ramsdens | 0 |
| Burgh Bar | 2 |
| Superdrug | 4 |
| Ladbrokes | 4 |
| Farmfoods | 7 |
| Hallmark & Thorntons | 1 |

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 |
| Wm Hill | 1 |

Hour: 10.30 - 11.30

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

Hour: 11.30 - 12.30

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

Hour: 12.30 - 13.30

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

Hour: 13.30 - 14.30

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

Hour: 14.30 - 15.30

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

Hour: 15.30 - 16.30

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

Hour: 16.30 - 17.30

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

Evening count

| | |
|---------------|----|
| William Hill | |
| 17.30 - 18.00 | 10 |
| 18.00 - 18.30 | 10 |
| 18.30 - 19.00 | 9 |



Dumbarton Credit Union Ltd.

147 High Street

Dumbarton

G82 1NZ

Tel.: 01389 768 585

Email: enquiries@dumbartoncreditunion.org

Alan Williamson
Team Leader – Forward Planning
Planning & Building Standards
Aurora House
Aurora Way
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

WEST DUNBARTONSHIRE COUNCIL**Report by the Strategic Lead - Regulatory****Planning Committee: 27 April 2016**

Subject: Receipt of appeal against enforcement notice at Fisherwood House, Lomond Road, Balloch (EP14/047 & EP15/057)

1. Purpose

- 1.1** To inform the Committee of the receipt of an enforcement appeal.

2. Recommendations

- 2.1** That the Committee notes the receipt of this appeal.

3. Background

- 3.1** Following complaints about the use of an outbuilding within the garden of Fisherwood House, in early 2015 the Planning Service initiated enforcement action in relation to its unauthorised use for holiday accommodation. The property owner then submitted an application for retrospective planning permission for the use, and officers agreed to allow that application to run its course before taking the enforcement action further. However, the application was refused under delegated powers in September 2015 due to concerns about the impact of the use upon the amenity of a neighbouring dwelling, and a review of that decision was also refused by the Local Review Body on 10 February 2016.
- 3.2** A further enforcement notice was therefore issued on 16 February 2016, requiring that the unauthorised use of the outbuilding cease, and also that an unauthorised fence which had been erected on the site during 2015 be removed.

4. Main Issues

- 4.1** The appellant has lodged an appeal against the enforcement notice on the following grounds
- *That the use does not constitute a breach of planning control;*
 - *That the use is immune from enforcement action due to the length of time which has passed since it occurred;*
 - *That the requirement to remove the fence exceeds what is necessary to remedy the injury to amenity which it causes; and*
 - *That the time period for compliance falls short of what should reasonably be allowed.*

4.2 The appeal is to be determined by a Reporter appointed by the Scottish Ministers, and dealt with by way of written representations. The Committee will be advised of the outcome of the appeal in due course.

5. People Implications

5.1 None

6. Financial Implications

6.1 The appellant has not submitted a request for an award of expenses, although at the time of writing the deadline for such requests had not yet passed.

7. Risk Analysis

7.1 No risks have been identified.

8. Equalities Impact Assessment (EIA)

8.1 Not required.

9. Consultation

9.1 Not required.

10. Strategic Assessment

10.1 There are no strategic issues.

Peter Hessett

Strategic Lead - Regulatory

Date: 8 April 2016

Person to Contact: Pamela Clifford, Planning & Building Standards Manager,
email: Pamela.Clifford@west-dunbarton.gov.uk

Appendices: None

Background Papers: 1. Enforcement Notice
2. Appellant's Grounds of Appeal

Wards Affected: Ward 1 (Lomond)