

Dissertation Title:

The Impact Of Betting Shops On UK High Streets And The Planning Response To It.



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1. Introduction

1.1 Hypothesis and Scope of Research

The main objective of the primary research for this dissertation was to test the hypothesis that local planning authorities are unable, in some cases, to fully implement or enforce their own policies or intentions regarding betting shops. If this hypothesis is true, then there would be grounds to argue the case for government intervention and to offer guidance at a national level. The research also aimed to highlight where local authority planning policy and documentation relating to betting shops may be insufficient in allowing councils to implement policy effectively. Details of the research are listed in Chapter 5.

The objectives of this dissertation were:

1. To determine whether local planning authorities have the necessary means to implement and enforce their own policies with regards to the clustering and proliferation of betting shops.
2. To investigate the impact that over-concentration of betting shops may be having on the vitality and viability of British high streets.
3. To design repeatable research methods that may assist in future studies relating to betting shops.

The scope of the research extended primarily to England and Wales but planning documentation from West Dunbartonshire in Scotland has also been analysed.

1.2 Personal Learning Objectives

My personal learning objectives in researching this topic are to gain a better understanding of the planning application and appeal processes in general and to gain insight into local planning authority policy documents, especially those dealing specifically with betting shops. In addition, I hope to gain a thorough understanding of the impact of betting shops on high streets and learn how these and other forms of land uses that may generally be unpopular, can be dealt with fairly, efficiently and thoroughly by the planning system. The topic presents its self as an interesting and topical avenue of investigation and an opportunity to contribute to the body of knowledge.

At the time of writing, I have no conflicts of interest to declare.

2. Background

In December 2016, the issue of the clustering of betting shops and payday lenders was debated in the House of Commons as part of the third reading of the proposed Neighbourhood Planning Bill. An amendment was being proposed by Graham Jones MP, member of parliament for Hyndburn, that the government give clarity by way of guidance to local planning authorities regarding the clustering of betting shops on UK high streets (House of Commons 2016). Mr. Jones' concerns reflected a mood which is echoed by other politicians and is a topic which has also been widely reported on in the media in recent years. These include the impact on the vitality and viability of high streets as well as on communities. The planning system needs to enjoy the confidence of the

general public and Mr. Jones' calls for government intervention at a national level suggest that the current planning system may not have that confidence in relation to betting shops. It should be noted that betting shops play a legitimate part in the mix of land uses on high streets. The concern and focus of this dissertation lies with analysing the mechanisms for managing proliferation and clustering of betting shops from a planning perspective.

2.1 What is a betting shop?

Betting shops in Britain are familiar to most people from the outside because of their colourful and conspicuous branding, but some may be unaware of how they operate. Betting shops are frequented almost exclusively by men, with women choosing to self-exclude (Hubbard 2016). Entry to betting shops is for people over 18 and bets can be placed on the outcomes of sports matches as well as events such as political elections, reality television shows and virtual sports events. In addition, current licensing laws permit betting shops to have a maximum of four Fixed Odds Betting Terminals (FOBT) (also referred to as B2 machines). These are typically roulette or other casino-style arcade games. Recent years have seen the growth of broadband internet as well as fast and affordable mobile phone data connections. Online betting and gaming has grown commensurately and yet high street betting shops continue to be frequented by punters.



Fig. 1 A typical betting shop interior, Edgware Road, London

(photo: author)

2.2 The History of Betting Shops in the UK

The BBC reported on the 1st of September 1960 that as from 1st of May 1961, betting shops would be allowed to open in the UK (BBC 1960). The government had hoped that legalising betting shops would take gambling off the streets and put an end to the practice of bookmakers sending ‘runners’ to collect bets from punters. Up to this point, bookmakers operated on-course at horse and dog racing tracks. From a social perspective, the move was welcomed in helping to bring the nation’s gambling habits under greater government control. Racing presenter, John McCririck described the situation at the time of betting shop legalisation:

“Gambling was being dragged out of the Dark Ages, when the only legal bets were made on the racecourse, or the phone. Street betting had been rampant and everyone knew it. Bookies’ runners ferried bets between punters and bookmakers, collecting in pubs and clubs (commonly in the urinals), and on street corners.” (Independent 2008 : np).

After 1st of May 1961, betting shops were opening at a rate of 100 a week and after six months the total had already reached 10,000. These betting reforms were introduced by a Conservative government and along with the new freedoms also came restrictions. Unlike the colourful betting shops of today in a planning culture that promotes active frontage on high street shops, the first examples were required to have ‘dead windows’, blacked-out or shuttered with no visible enticements to prospective punters. 1986 saw the next significant changes since 1961 in gambling legislation, with betting shops being allowed to provide hot drinks, brighter interiors, seating and television coverage from racecourses. By this stage, four major firms had grown to dominate the betting shop market; William Hill, Ladbrokes, Coral and Mecca.(Independent 2008 : np). The most significant change to betting shops followed with the *Gambling Act 2005* which allowed the introduction of Fixed Odds Betting Terminals (FOBT) into shops. These gaming machines are the source of much of the political and media interest that currently surrounds betting shop clusters.

2.3 Licensing and Planning

Betting shops fall under the control of two regulatory regimes, licensing and planning. In order to evaluate the role of planning, distinguishing between the responsibilities of the two regimes is important. Licensing Lawyers (2017) make the point that there may be a misconception that, due to local authorities making decisions on both licensing and planning, what applies to one must automatically apply to the other, but this is incorrect, these are two completely separate regimes. Town planning is primarily concerned with how land is used and not who uses it, licensing is concerned with the way in which the land use is operated. In the first instance, an applicant applies for an operating license where applicable, but may then also be subject to planning approval. One is not a guarantee of the other and additional operating conditions such as restriction on operating hours may be imposed on the applicant as part of the planning approval process.

The licensing department of the London Borough of Richmond upon Thames (2017) explain that under the government’s *Gambling Act of 2005*, councils are required to publish a statement of the principles that they propose to apply when exercising licensing functions. They also stress that these principles have been prepared bearing in mind the limitations on the discretion of the council which is imposed by the Act. The responsibilities of a licensing department are primarily to prevent gambling from being a source of crime or disorder, being associated with crime and

disorder or being used to support crime. Licensing should also ensure that gambling be conducted in a fair and open way and should protect children and vulnerable persons from being harmed or exploited by gambling.

When looking at planning law in relation to planning and licensing control, Moore (2014) refers to the case of *Roger Lethem v Secretary of State and Worcester City Council* [2003] JPL 332. In this case, a refusal to grant planning permission for a change of use of premises was appealed and the appeal dismissed. An application was then made to quash the appeal but this application was dismissed by the High Court. The applicant had contended that the inspector erred in failing to recognise that the objections he found to aspects of the proposed use change were matters that fell under the responsibility of licensing authorities and would therefore not justify a refusal of planning permission (Moore 2014). This dismissal of the appeal in this case sets a precedent in that it highlights the inextricable and intertwined nature of the two parallel regimes. Responsibilities of licensing may also apply to planning, and vice versa.

Using case law examples from pollution control and referring specifically to Planning Policy Statement (PPS) 23, Moore (2014) explains that planning and pollution control are separate but complementary procedures with both designed to protect the environment from harm caused from development, but with different objectives. The planning system should therefore not be used to duplicate environmental control, but Moore explains that the divide between the two regulatory regimes is not always clear and that invoking the planning powers for amenity reasons is acceptable even when conditions have been imposed by other means of control. PPS23 also made the point that the scope of the planning regime extended beyond that of the pollution control regime and that the objectives of planning are broader than those of licensing as they need to consider a wider context to ensure the overall vitality of an area.

In their policy documentation on betting shops, the London Borough of Brent (2014, p14) make the following statement: “*Since the introduction of the 2005 Gambling Act the council’s Licensing Committee have limited powers to prevent an over-concentration of betting shops and AGCs, as decisions can no longer take account of need. It is therefore necessary to use the planning system to control these uses.*” This claim again reinforces the responsibility of planning, this time with a very specific reference to the clustering of betting shops. The responsibilities of planning concern the nature of land use with a major objective being to protect town centres from any detrimental impacts on the vitality and viability of high streets. Managing the change of land use from one use class to another is a major responsibility of planning and is particularly relevant to betting shops. Managing use change ensures that a balance is achieved between retail and non-retail uses and helps to ensure that high streets remain competitive, diverse and attractive. Many authorities specify limits on the proportion of non-retail frontages that are permitted in a town centre with this ranging typically between 15% and 30%. Clustering of uses is also controlled by planning and this is particularly relevant to betting shops. Some authorities also set a minimum distance that needs be achieved between similar uses to prevent over-concentration. Over 80% of the planning appeals studied for this dissertation involved a change of use from one use class to another and even though local authorities have the power to restrict use change, evidence from research by the author shows that these policies often fail when tested at appeal.

The House of Lords (2017) Select Committee which reviewed the *Licensing Act 2003* published their report, *The Licensing Act 2003: Post-Legislative Scrutiny* in April 2017. The report stressed

that efforts should be made at council level to coordinate licensing and planning but noted that licensing and planning regimes are not formally joined and this prevents planning officers making representations against licensing applications. A key finding of this report was that planning committees are more effective and reliable, and are well-equipped for making licensing decisions. As a result, a recommendation was made that planning departments should take over the licensing function. It was also recommended that the licensing and planning systems should begin immediately. A further recommendation was that licensing appeals should no longer go to magistrates' courts but should, like planning appeals, go to the planning inspectorate. These recommendations reflect a lack of confidence in the current licensing/planning relationship and boldly question whether the current licensing regime in the UK is even fit for purpose.

In conclusion, licensing and planning are separate, parallel regimes but often have overlapping responsibilities. Defining the functions of each regime can be difficult and planning may need to take responsibility on issues where licensing has failed, particularly with respect to protecting the wider urban context that planning seeks to manage. At the time of writing, licensing and planning remain separate regimes.

2.4 Use Class Change

The Portas review into the future of high streets analysed the current health of UK high streets and concluded with recommendations for future action. One of the recommendations was that betting shops should be moved into a separate Use Class of their own, a call which was echoed by Harriet Harman MP (2011) and the Town and Country Planning Association (TCPA). In their report, *Planning Out Poverty*, The TCPA (2013) refer to proliferation and concentrations of betting shops along with uses such as take-aways and off-licences. These uses are referred to as "low-end" (TCPA 2013: p22) and note that these clusters are a concern for local residents who were interviewed as part of case studies. Clustering of betting shops and these other non-retail land uses are mentioned alongside dog dirt, litter, cheap alcohol establishments and smoking outside schools as being issues negatively affecting the areas covered in their case studies. The TCPA admits that planning is struggling to offer an effective way of controlling the problem. Their recommendation was that the government should consider granting new powers, perhaps on a discretionary basis, to allow for community control over changes of use. They go further to explain that this could be achieved by making modifications to the Use Class Order so that the use of retail premises for a betting shop would require planning permission. The Royal Society for Public Health (RSPH) (2015) also joined the call for a Use Class change in their report, *Health on the High Street*. An objection to the proposed Use Class changes came from the Association of British Bookmakers (ABB) who voiced their concerns through the Centre for Economics and Business Research (CEBR) report which was commissioned by them. Concern was voiced that a Use Class change would result in fewer betting shops being opened and this would impact on the amount of employment that bookmakers would be able to offer, especially to the unskilled, the young and women. Fears were expressed that under stricter regulations, smaller bookmakers might struggle to expand resulting in a lack of competition amongst larger rivals. One interviewee in the report claimed that a Use Class change would result in as many as 30-50% rejected applications for new shops, another estimated potential rejections as high as 75% (CEBR 2012). The Greater London Assembly (GLA) (2013) also made a recommendation in 2013 that betting shops be considered *sui generis* for planning purposes, specifically with the intention of addressing the issue of over-concentration.

Whether the recommendations from Portas, Harman, the RSPH, The GLA and the TCPA and others was coordinated or not, the Department for Communities and Local Government held a consultation in 2014 and legislation was introduced on 16 April 2015 when the *Town and Country Planning (Use Classes) (Amendment) (England) Order 2015* and the *Town and Country Planning (General Permitted Development) (England) Order* come into force. Betting shops were taken out of A2 (financial services) and instead made Sui Generis. This meant that planning permission would be required for all new betting shops, even if these units were just a change of use from an A2 use which would previously have been permitted development.

2.5 UK Betting Shop Statistics

For the purpose of context and general knowledge, the following statistics help explain the current state of affairs. As of March 2017, there were a total of 8788 betting shops in Britain which represents a 1.4% decrease since March 2016 (Gambling Commission 2017). When betting shops were first legalised, the number of shops rose to around 10,000 within 6 months (Independent 2008) rising to a peak of over 16,000 in the 1970s and 1980s (ABB 2017). The current drop represents a 43% decrease since the 1970s up to the present time (William Hill 2017). It should also be noted that 85% of all betting shops in the UK are owned by four operators: William Hill, Ladbrokes, Gala Coral Group and Betfred. This domination of the market by large bookmakers is a point of planning concern in that it allows the financially powerful companies to elevate property rents, pricing out smaller operators and reducing competition. (London Borough of Brent 2014). Approximately 23% of all betting shops in the UK are to be found in London (Kumar and Yoshimoto 2016) making London a particularly interesting focus of study. Betting shops also make up 4% of all shops in the UK, a useful statistic to use in comparison when defining proliferation or clustering. A current area of concern with betting shops relates to Fixed Odds Betting Terminals (FOBT) and their affect on mental health, this topic is discussed in more detail in the literature review of this dissertation. The Gambling Commission (2017) calculate a total of 34,388 FOBT machines in the UK as of March 2017, this represents a decrease of 0.6% from April 2015. Income from these machines is significant for bookmakers as they make up 40% - 50% of betting shop income (Harman 2011 and Hubbard 2016). In relation to crime, Kumar and Yoshimoto (2016) identify that the increase in betting shops is directly related to an increase in crime. Their study in London showed that for every 1% increase in crime per capita, betting shops increased by 1.2%. This may be a causal connection or an observed association but the increase in one is linked to an increase in the other.

Initial conclusions that can be drawn from these statistics are that the number of betting shops in the UK is declining and there are now less shops than there were in their first year of introduction in 1961. It can also be concluded that significant betting shop income is derived from FOBT machines. Recent research by Kumar and Yoshimoto (2016) also shows that in London, an increase in betting shops follow an increase in crime.

3. Literature Review

3.1 Background

The primary objective of the literature review was to determine the positive and negative aspects of betting shops in relation to planning, based on existing research. The key themes that emerged were then used to inform the primary research of this dissertation.

The Department of Culture, Media and Sport (2002) identified gambling as 'a safe bet' creating jobs and playing a meaningful role in the economy. Subsequently, gambling laws were liberalised with the introduction of the *2005 Gambling Act 2005*. This Act shifted the discussion about gambling from one of criminality to one of the gambling industry playing a positive role in the leisure economy. Licensing was taken away from magistrates and local authorities were given the role of licensing bingo halls, betting shops and casinos. Although the liberalised gambling laws affected casinos and bingo halls, betting shops have become the main source of concern and anxiety in the last decade and are depicted and perceived as 'toxic' businesses infecting high streets (Townshend 2016) who sell products and services that are associated with misery and exploitation.

3.2 'Noxious' Business

The word "noxious" is a strong one and is used by Hubbard (2016) to introduce the issue of public objection to the proliferation of betting shops. This public perception of proliferation may largely be due to the increased visibility of betting shops in recent years. In reality, their numbers have halved since the 1970s and yet they have become more visible as they have migrated from the back streets to the side streets to the high streets. (Jones et al 1994). This greater visibility can also be ascribed to betting shops taking over vacant or cheap properties in the wake of the 2007 / 2008 recession. Tottenham MP, David Lammy (2014) is aggressive in his attack on betting shops calling them a "parasite" on the high street. The word "besieged" is used to describe the chains of betting shop clusters which he claims are located close together in order to poach customers from one another in areas which are known to be profitable. His claim that *anyone* could tell that betting shop clusters are a haven for anti-social behaviour is probably an exaggeration used for effect but public opinion and perception (even if true) carries no material weight in a planning context. He goes on to describe how large numbers of men congregate outside the betting shops to smoke, drink and cause nuisance which is an intimidating sight for residents. Hubbard (2016) argues that this type of rhetoric suggests that local government is powerless to stem the proliferation of betting shops and that licensing and planning regulations are insufficiently robust to allow authorities to prevent new shops from opening.

Harriet Harman is another prominent politician who has highlighted the negative aspects of betting shops. As Shadow Secretary for Culture, Media and Sports in 2011 and MP for Peckham in South London, Ms Harman retrospectively criticised the *2005 Gambling Act* (which was passed when she was in government) which liberalised gambling laws and transferred the responsibility for licensing of betting premises to local councils. Harman (2011) is particularly concerned about how betting shops are blighting communities in low income areas. In her report entitled, *The Problem of Betting Shops Blighting High Streets and Communities in Low-Income Areas* Harman (2011), calls on the government to amend regulations under the *Gambling Act 2005* and lower the limits on stakes and prizes for FOBT machines. According to Harman, an unintended consequence of the *Gambling Act 2005* has been the proliferation and clustering of betting shops.

A factor that may be encouraging clustering is the limit of four betting machines per shop imposed by legislation. It is possible that all four machines in a particular shop could be occupied at the same time (it is even possible for one person to be playing all four machines at once) which might cause an impatient punter to look elsewhere for a vacant machine. A cluster of betting shops in the same location then offers that opportunity. It can be concluded then that a cluster of betting shops is beneficial for bookmakers who look to maximise income from these profitable machines. In evidence to the Culture, Media and Sport Committee, bookmakers Ladbrokes offered a very straight forward response when they argued that;

“...the decision to arbitrarily and artificially limit their number leaves bookmakers unable to respond to customer demand; and in some cases has led to an increased number of shops opening within a particular area in order to cater for customer demand, prompting complaints about their proliferation.” (Harman 2011: np).



Fig. 2 Betting shops operated by the same bookmaker, one shop apart. The Bullring Shopping Centre, Birmingham, UK. (photo: Twitter)

Mary Portas in The Portas Review says the following;

“I also believe that the influx of betting shops, often in more deprived areas, is blighting our high streets. Circumventing legislation which prohibits the number of betting machines in a single bookmakers, I understand many are now simply opening another unit just doors down (see Fig. 2). This has led to a proliferation of betting shops often in low-income areas.” (Portas 2011: p29)

These clusters may exist by design or may be fuelled by the availability of vacant or low-cost premises in deprived areas, but a consistent theme is that the poorest areas remain the locations of choice for large bookmakers who have the financial leverage to secure property. It is easy for anyone to casually observe that betting shops are more prevalent in areas with high levels of poverty and unemployment and are more scarce and even absent in well-off areas across the UK.

Harman (2011: np) goes as far as to describe this as “*predatory profiteering*” on the back of vulnerable communities which creates a “*dangerous synergy between welfare dependency and gambling that threatens the fabric of our communities.*” A report by the House of Commons Select Committee : Culture, Media and Sport (2011) found that problem gambling is highest amongst men, the young, the unemployed and in deprived areas. Like David Lammy, Harman also argues that the proliferation of bookmakers damages the look and feel of high streets making them feel less safe, less welcoming and less diverse. The London Borough of Brent (2014) refer to the 2010 British Gambling Prevalence Survey which found there to be an association between problem gambling and being Asian / Asian British, unemployed and being in bad or very bad health, reinforcing the view that betting shops might be more profitable when located in poorer areas. The referencing to racial profiling like this is rare, possibly due to its sensitive nature, but may be an area relating to betting shops which is overlooked. Another concern relating to race was noted in planning appeal APP/X5990/A/11/2159392. The appeal was made against a refused planning application for a betting shop in China Town in the borough of Westminster in London. The inspector referred to concerns that had been expressed at the negative social effects of gambling particularly in relation to the Chinese community. The inspector didn't place any weight on the claim and allowed the appeal. Although controversial, research into racial trends with regards to problem gambling and betting shops may offer very useful insights for planners especially in relation to public health and well-being.

3.3 Crime

On the subject of crime, Harman (2011) quotes research carried out by Community (the Union for Betting Shop Workers) which highlighted significant increases in anti-social behaviour evidence at betting shops since 2005. In contrast, Griffiths (2011), in investigating whether there is a relationship between betting shops and crime, concluded that there was no empirical evidence to show that gambling venues, including betting shops, cause crime. His evidence shows that incidents of violence in betting shops were lower than business types such as pubs and hotels but concedes that more data is required at a national and local level and that data held by bookmakers has either never been collected or has never been made public. In contrast, a very conclusive finding on the link to crime comes from recent research conducted by Kumar and Yoshimoto (2016). They investigated the casual effect of crime on the number of betting shops using annual data from London boroughs from 2007 to 2015. Their study is a response to conclusions by others that, (1) there is a positive correlation between gambling activities and local crime, (2) that gamblers, on average, are from socio-economically deprived backgrounds, and (3) that betting shops tend to be located in areas with high degrees of socio-economic deprivation. The findings concluded that a 1% increase in the crime rate causes a 1.2% increase in the number of betting shops (per capita). Expressed in another way, a new betting shop is opened in a London borough for every 1.4% increase in local crime rate on average. The authors acknowledge the limits of their findings in that the study is not a dual-causality investigation. The study only investigates the link between the increase of betting shops to the increase of crime and not the increase of crime based on the increase of betting shops. It is often claimed that betting shops attract criminal behaviour in their vicinity, these findings do not confirm this assumption, rather, they confirm that the increase in crime attracts an increase in betting shops. These findings have potential policy implications for licensing and planning. An objective of the *Gambling Act 2005* is to keep gambling free from crime but these figures show a failure of that intention in London. If licensing is unable to contain the link to crime successfully, responsibility then falls to planning

in an attempt to prevent betting shops being associated with crime and disorder and affecting the health of high streets.

3.4 Vitality and Viability of High Streets

Preserving and improving the vitality and viability of high streets is one of the priorities of planning for locations of betting shops. Betting shops, along with other non-retail land uses such as building societies, estate agents, nail parlours and tattoo parlours (amongst others) present a threat to the attractiveness of town centres. Fernie et al (1983) maintain that the crux of the debate about non-retail (or quasi-retail) uses is the extent to which their growth detracts from the attractiveness of town centres. They claim that small retailers are out-bid by non-retail users for vacant retail and that service businesses create 'dead' shop frontages which does not encourage window shopping. There is also a claim that service businesses has led to an increased number of retailers closing down. In relation to betting shops, this claim is substantiated by London Borough of Brent (2014) who note that 50% of premises converted to betting shops, adult gaming centres and pawnbrokers since 2009 were previously occupied by independent businesses. Brent council also stress that over-concentration of uses reduces diversity, reduces footfall and therefore reduces the overall value and attractiveness of high streets. Also noted is that 85% of betting shops in the borough are owned by four bookmakers who have the financial strength to drive out small independent chains shops and chains through being able to afford higher rents. The Greater London Authority (2013) in their London Assembly report, *Open for Business : Empty Shops on London's High Streets*, referred to betting shops as 'low quality' units along with pawnbrokers and payday lenders and suggest that they reduce the overall value of a high street.

3.5 Are Bookmakers Deliberately Targeting Poor Areas?

Writers and researchers are divided on this issue and it is difficult to determine whether there is a deliberate strategy by bookmakers to target the vulnerable in society. Research conducted by the Royal Society for Public Health led to the following statement:

"Betting and loan shops and fast food outlets tend to cluster in deprived areas and have a disproportionate impact on those communities and the vulnerable". (RSPH 2015: p25).

The London Borough of Hammersmith & Fulham found that 39% of betting shops were located within the most deprived areas and 87% were located within 400m of the most deprived areas of the borough. Findings like these are difficult to explain away but Hubbard (2016) takes a more sympathetic view towards bookmakers, claiming it to be a fallacy that bookmakers prey exclusively on local residents and references findings that the majority of punters travelled more than 3 km to bet. Hubbard also notes that the prevalence of betting is lowest amongst the most deprived and highest amongst the wealthiest, referencing research by The Health Survey For England (2012). In contrast, Harriet Harman (2011) references Haringey Residents and Traders associations who highlight a vast divide in the borough of Haringey where the 66 betting shops are split 85% / 15% in an East / West divide with the claim that betting shops are located in key geographic areas so as to deliberately target the poor.

3.6 Public Health

Regarding public health, the RSPH (2015) identifies bookmakers as a health hazard on high streets and even go so far as to recommend that councils be allowed to set differential business rates to discourage unhealthy land uses such as *"betting shops, payday loan shops, tanning salons and fast food outlets (among others.)"* (RSPH 2015: p28). Using their own rating system, betting shops were awarded a score of -2 along with fast food outlets. To place that in context,

pubs and bars scored +2, libraries +4 and health clubs +5. Only payday loan shops scored lower than betting shops with a score of -4. Townshend (2016) also adds to the mental health debate concluding that problems of addiction and poor mental health disproportionately affect poorer communities and that academic evidence would strongly suggest that there is a link between proximity, availability, accessibility and consumption of unhealthy shops and services. The RSPH (2015) go further to suggest that businesses that promote health be supported financially by councils. This sentiment is in line with the clear ambition on promoting health set out in the National Planning Policy Framework (NPPF) (CLG 2012) but would be difficult to implement when balanced against the other intentions of the NPPF and local planning policies relating to vitality, viability, diversity and competition. It is also not the role of planning to favour one business interest or land use over another on a high street but to encourage a competitive retail environment.

3.7 Economic and Social Advantages of Betting Shops

The Association of British Bookmakers (ABB) note the positive economic impact that betting shops have in Britain. The ABB commissioned a report which investigated the economic contribution of betting shops. This research was undertaken by the Centre for Economics and Business Research Ltd (CEBR) which is an independent economics and business research consultancy. The research was commissioned with the intention of focussing specifically on the positive economic contribution of betting shops. The CEBR published the report in 2012 and listed below are the most significant findings:

0.2%: Contribution of betting shops to the UK GDP.

0.2%: percentage of the total UK employment created by betting shops.

41,000: Full time equivalent jobs created directly by betting shops.

63,000: Full time equivalent jobs created directly and indirectly by betting shops (with a multiplier added).

4-7: Typical number of employees per betting shop.

The CEBR calculates that for every £1 that a betting shop generates in Gross Value Added (GVA) income, it also generates an extra £0.61 of GVA in the wider economy through indirect and induced impacts. This additional 61% of GVA is a significant figure that suggests that betting shops are making a positive contribution to the viability of high streets. The CEBR make clear that the growth strategy of betting shops involves filling vacant premises and that whatever economic benefit a new betting shop may bring, large or small, it will always be more than a vacant high street shop. Restricting the growth of betting shops could deprive local Government of a potential source of increased revenues from business rates. (CEBR 2012). It was also estimated that for each new betting shops that filled a vacant shop, £150,000 to £200,000 was spent on refurbishment and fit-out costs; a significant and positive contribution to the wider economy.

On social benefits, the CEBR note the positive employment aspects of betting shops. They highlight the high proportion of employees who are low-skilled, young and female; the individuals who are presently facing the most severe labour market challenges. (CEBR 2012). Rebecca Cassidy (2014) also highlights the social positives of betting shops, pointing to a sense of belonging for punters who bind together in an imagined community which has its origins in working class culture and offer environments which are interesting and fun for those who enjoy

it, where a small-stake, high-return bet creates excitement and interest for potentially a small outlay of money. Hubbard concludes that devaluing the betting shops in respect of their impact on vitality and viability of high streets “*seems to betray class-based prejudices against what is ultimately an affordable and popular form of sociality and leisure.*” Hubbard (2016: p166).

3.8 Meanwhile Uses

51% of the successful appeals that were analysed for this dissertation involved a proposed betting shop filling a vacant site. In many of the cases it was noted by the inspector that filling a vacant site with a betting shop was still preferable to having a vacant unit even if it was designated to another use class. Betting shops would provide an active frontage of sorts and would encourage footfall which would probably translate into linked trips to other shops. In the process of researching for this dissertation, the concept of ‘Meanwhile Uses’ of premises emerged as a potential alternative. ‘Meanwhile Use’ is an umbrella title which has emerged in recent years to describe a diverse range of pop-up shops, cafes and temporary uses. ‘Meanwhile Uses’ have generally been seen as a reaction to depressed economic climates that provide temporary solutions, but Finney (2013) proposes that these should be looked at a part of a normal response to regeneration. A good example of this type of regeneration was the Re:START initiative in Christchurch, New Zealand which provided a temporary shopping core in the wake of the 2011 earthquake and helped the city to regenerate. The GLA (2013) also made a recommendation regarding interim uses as part of their report, *Open for Business – Empty Shops on London’s High Streets*. They saw value in actively-managed, area-wide schemes to ensure high-quality and complementary interim uses. Meanwhile uses also offer an opportunity for planning authorities to test out temporary land uses without having to commit to them long term, a very organic way of allowing a town centre to define its self whilst still being actively managed.

Bookmakers pursue a growth strategy of occupying vacant premises (CEBR 2012) and 51% of successful planning application appeal cases that were analysed involved the conversion of vacant premises. Filling a vacant premises is given significant weight by inspectors when allowing an appeal, even in cases where a local authority has refused planning permission in the first place. An active strategy of pursuing a programme of ‘Meanwhile Uses’ by councils may offer a legitimate solution to prevent unwanted betting shops as well as encouraging an innovative and dynamic method of town centre regeneration and an alternative to council-led planning. This topic has not been considered in detail for this dissertation but a superficial study has found this to be a positive, potential alternative to the strategy of bookmakers deliberately targeting vacant shops with a measure of confidence that this is generally viewed positively by inspectors at planning appeal stage.

3.9 Conclusions from Literature Review

Betting shops form a legitimate part of the mix of land uses that make up high streets but over-concentration of them and the resulting impact on the vitality and viability of high streets emerges as the main challenge for planning. The association of betting shops with crime is also a major issue but more research is needed into the suspected association between the two to form any confident opinions on the subject. It also appears at a superficial level that bookmakers target poorer areas as their shops are often located close to areas of deprivation, however bookmakers pursue a business model of occupying vacant high street units which may also explain why new betting shops are more likely to appear on high streets which are not in a good state of economic health. These high streets may offer a greater selection of empty units at

comparatively lower rents to those in thriving high streets in wealthy areas. Successful planning appeals studied for this dissertation showed that planning inspectors look favourably on vacant shops being occupied by bookmakers, even when a planning authority deems it inappropriate at planning application stage. A strategy of ‘meanwhile’ uses may offer a sensible alternative to the ‘better-than-nothing’ approach of filling a vacant unit with a betting shop.

4. Policy Review and Policy Context

4.1 National Planning Policy

The National Planning Policy Framework (NPPF) is the starting point for the national policy context and focusses on issues of health and well-being and vitality and viability of high streets. The NPPF paragraph 7 identifies the three dimensions of sustainable development; economic, social and environmental. The planning system should be contributing to building a strong, responsive economy; protecting and supporting strong, vibrant and healthy communities and protecting the environment, built and natural. Sheppard and Askew (2016) argue that paragraph 7 of the NPPF sets out a clear social ambition regarding health and that local authorities should be ensuring that health and well-being be considered in planning decision making. The NPPF recognises town centres as being integral to meeting local need and supporting well-being and states that policies should be positive, encourage competitive town centres that offer variety and choice through a diversity of retail offerings. Paragraph 23 deals specifically with the vitality and viability of town centres and has the intention of ensuring resilience to future economic changes. National policy also requires planning policies to guard against the loss of amenity in the form of valued facilities and services.

4.2 Regional Planning Policy

At regional level, The London Plan (GLA 2016) has been reviewed as part of this study and it sets out the London-wide framework for town centre and retail uses. Policy 2.15 echoes national policy and identifies the importance of competitive and diverse retail as well as the importance of town centres promoting health and well-being. A particular concern of the document lies with the over-concentration of uses such as betting shops and accordingly, policy 4.8 states that Local Plans should manage clusters and uses having regard to their negative impacts on broader vitality and viability, competitiveness, diversity, local identity, community safety and quality of retail offering.

The Mayor also has supplementary planning guidance for town centres (GLA 2014a) which encourages boroughs to manage over-concentration of uses and activities. With specific reference to betting shops, paragraph 1.2.30 says the following:

“There are genuine planning issues affecting amenity, community safety, diversity of uses and the continued success of town centres which justify allowing planning authorities to consider the merits of proposals for betting shops” (paragraph 1.2.30).

4.3 Local Planning Policy

At a local level the responses vary from one planning authority to another with some more robust and thorough than others. Some are exemplary and have betting shop-specific policies or supporting documents, others rely on general development policies alone to control issues such as clustering or the protection of uses. Reviewed below are policies from five randomly selected local

planning authorities in London. Freedom of information requests made in March 2016 were used to determine the number of betting shops in each borough from 2007 when local authorities took over responsibility for the licensing of betting shops. The number of betting shop numbers per borough are shown in Fig. 3 on page 18.

4.3.1 The London Borough of Barking & Dagenham

The borough published a Supplementary Planning Document, *Controlling the Clustering of Betting Offices* (LBBD 2013) as a supplement to core strategy policies of promoting vibrant town centres, general principles for development, town centre hierarchy, and vibrant and prosperous town centres. Related policy listed in the SPD include:

Core Strategy (2010)

SO.7: Promoting Vibrant Town Centres

CM1: General Principles for Development

CM5: Town Centre Hierarchy

CE1: Vibrant and Prosperous Town Centres

Borough Wide Development Policies (2011)

BE1: Protection of Retail Uses

BE2: Development in Town Centres

BE3: Retail Outside of Town Centres

BP8: Protecting Residential Amenity

BP11: Urban Design

Despite the existence of a betting shop-specific SPD, none of these policies are betting shop specific and may explain why the Council has the joint highest number of allowed appeals along with Redbridge Council over the time period studied for this dissertation.

Betting shop numbers have grown from 41 to 45 from 2007 to 2015 with four of those years showing a decline in numbers from the previous year. From this evidence, it appears as if proliferation of shops is under control in the borough and that the main planning issue is likely to relate to issues of clustering and over-concentration.

4.3.2 The London Borough of Brent

The borough published their report: *A Fair Deal: Betting Shops, Adult Gaming Centres and Pawnbrokers in Brent* in 2013 (LBB 2013). The document is in the form of a report, compiled with the intention of providing an informed evidence base to support town centre policies in their Development Management Development Plan Document (DMDPD). The primary objective of the document is to support the council's decision to seek to prevent the over-concentration of payday lenders, adult gaming centres and betting shops. The policy which the report supports is Development Management Policy DMP3 which relates to Non-Retail Uses. Here, limits are set on the amount of betting shop frontage allowed in relation to the rest of the town centre and neighbourhood parade frontages.

The number of betting shops in Brent grew from 65 to 99 from 2007 to 2015. However, that number has almost stagnated since 2013 which suggests that the Council has successfully

contained the problem of proliferation. As with Barking & Dagenham, the main planning issue remains the management of clustering and over-concentration. Policy is relatively limited but it is backed up with a thorough and valuable evidence base.

4.3.3 London Borough of Hammersmith and Fulham

On 28 February 2017, the London Borough of Hammersmith and Fulham submitted the Proposed Submission Local Plan and supporting documents to the Secretary of State for Communities and Local Government for examination. The borough also published a report entitled *Background Paper: Betting Shops, Pawn Brokers and Payday Loans Shops* (LBHF 2016a) which provides evidence to support the Local Plan Policies listed below:

Policy TLC2 – *Town Centres*, aims to maintain or increase vitality and viability. To this end, the policy does not allow additional betting shops to be permitted on the ground floor of prime retail frontages in designated town centres. The justification for this stance is that there is already a high concentration of betting shops with the cumulative effects of ‘dead’ frontages at certain times of the day and adverse impacts on residential amenity outside normal shopping hours. There is also an impact generally on vitality and viability.

Policy TLC4- *Small Non Designated Parades, Clusters and Corner Shops* is the next policy which concerns betting shops. Here, the policy allows for the refusal of a betting shop planning application where the number of uses may adversely impact on the quality of the parade.

Policy TLC6 - *Betting Shops, Pawnbrokers and Payday Loan Shops and Hot Food Takeaways* deals directly with the borough’s current over-representation of betting shops and does not permit planning permission for new betting shops in prime retail frontage of town centres. In addition, the policy sets a limit at a minimum of a 400 metre radius between any new and existing betting shop. It also states that betting shops will only be permitted where the applicant can demonstrate that the shop will add to the vitality and viability of the existing shopping parade and that it will not impact on residential amenity. There is also an acknowledgement, based on their evidence, that over-representation of betting shops in deprived areas can have an impact on health and personal finances.

The substantial nature of both the policies and supporting documentation produced by Hammersmith & Fulham Council is impressive. Betting shop numbers in the borough have declined from 48 to 41 from 2007 to 2015 with a drop of 8 shops from 2014 to 2015. The robustness of the new policies and evidence base will likely ensure that the situation will remain under control from a planning perspective.

4.3.4 London Borough of Islington

Islington Council’s approach to dealing with betting shops is thorough and clear. Policy context begins with Core Strategy policy CS 14 . This policy relates to Retail and Services with the aims to actively promoting independent retail, protecting the character of an area, protecting the loss of shops and other uses as well as managing the demands on the public realm caused by business. Development Management Policy DM4.3 is relatively short and states that proposals for betting shops will be resisted where they are in proximity to schools or sensitive community facilities. This policy is supported by a substantial Supplementary Planning Document, *Locations and Concentration of Uses* (LBI 2016) which does not create new policy but provides further guidance on existing Local Plan policy.

This robust approach to the clustering of betting shops may explain why Islington Council have not had a planning appeal allowed since 2013. Betting shop numbers in the borough are also in decline, dropping from 74 to 61 from 2007 to 2016 which suggests that proliferation is under control.

4.3.5 London Borough of Redbridge

On 3 March 2017, Redbridge Council submitted the Redbridge Local Plan and supporting documents to the Secretary of State for independent examination. In all the appeals that were studied as part of the research for this dissertation, Redbridge Council returned three allowed appeals in the time range that was studied, with no appeals being dismissed. Only Barking and Dagenham returned the same number of allowed appeals suggesting that these two London boroughs are two of the worst performing in the UK when defending their own policies in relation to betting shops. A possible reason for this is the current lack of any betting shop-specific policies with much reliance being placed on Core Strategy SP3: Built Environment. Policy SP3 exists to ensure that the council maintain a high standard of built environment in the borough through issues such character and appearance, high-quality design and protection of amenity, but the nature of this policy appears too broad to be effective in the case of defending betting shop planning application appeals. The new Local Plan looks set to remedy the problem with policy LP11 relating specifically to managing clustering and proliferation of town centre uses. The policy states that betting shops will need to demonstrate how they will promote health and well-being and will be required to provide shop frontages that will have a positive impact on the street scene. A limit of a 50 metre radius is also imposed as a minimum distance to be maintained between any new and existing betting shops.

Betting shop numbers in the borough are have dropped from 59 to 58 from 2008 to 2016 after a peak of 72 in 2012. As with most of the other boroughs studied, proliferation of betting shops appears to be under control with clustering and over-concentration remaining the main planning issue moving forward.

4.3.6 Conclusions

Evidence drawn from the research for this dissertation, shows that the worst performing councils in the UK when defending appeals appears to be directly linked to insufficient local policy and an insufficient evidence base. The boroughs of Barking & Dagenham and Redbridge are the two worst performers nationally when it comes to defending appeals, however, both councils have successfully brought proliferation under control. In contrast, the councils of Hammersmith & Fulham and Brent have been able to successfully control proliferation and in the case of Hammersmith & Fulham, taken the number of betting shops into significant decline. In addition, both councils have been successful in implementing their own policies to the point that there have been no appeals lodged against either authority over the period analysed for this dissertation. Islington sit between these two pairs of councils with two allowed appeals, however the significant decline of betting shops in the borough in recent years suggests that the problems of proliferation and over-concentration are now under control and their impressive evidence base will ensure that planning policy should be successfully implemented in future.

Figure 3 below compares the performance of the five boroughs graphically.

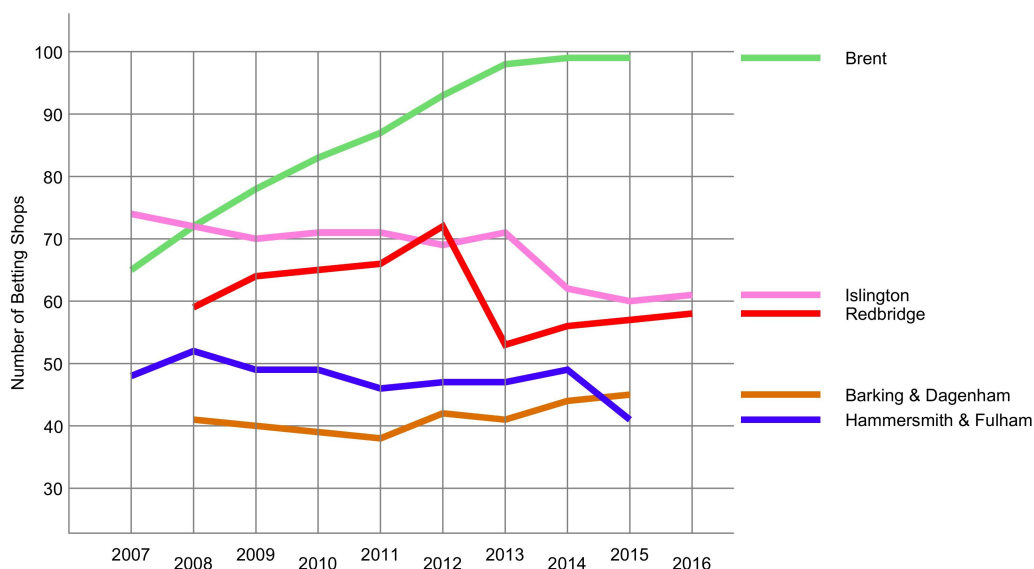


Fig. 3 Betting Shops per Borough – Selected London Boroughs

Data Source: Freedom of information requests, see Appendix A (graphic: author)

A frustrating and time-consuming element of researching policies relating to betting shops has been the unique and fragmented nature of the policy documentation for each planning authority. Long-term council staff may be well versed in their own documentation and policy structure, but applicants or new members of council staff may require a disproportionate amount of initiation to fully understand the full scope of relevant policy. This problem obviously extends further than just betting shops and for the sake of efficiency for the authors, enforcers and users of planning policy, a national policy naming and numbering protocol might be useful. For example, the construction industry utilises classification systems such as CI/SfB which can be used by any construction related discipline to classify documents or construction products. Establishing a similar style of classification system for planning in the UK would allow for uniformity between planning authorities but still allow flexibility for expansion or customisation to suit local issues.

If central government is to intervene in any way in helping to limit the proliferation of betting shops by assisting local planning authorities, establishing some form of tool kit or templates for documentation may be the best form of assistance. In studying the relevant policies from these five London Boroughs, it has become evident that the quality of policies and supporting documentation varies. A national standard of documentation would at least allow the poorer performing or more under-resourced councils to at least be adequate in the area of tackling betting shop proliferation and clustering.

5. Research

5.1 Introduction to the Research and Methodology

Following the conclusions drawn from the literature review, the main primary research element of this dissertation emerged as the quantitative analysis of planning appeals which had been made against refused planning applications for betting shops. The purpose of this research was to look for common trends in successful appeals. These trends would serve to highlight potential weaknesses in planning policy which may be contributing to successful appeals in cases where councils have deemed new betting shops to be inappropriate. The research was designed to test the theory that local planning authorities are unable in some cases to fully implement or enforce their own policies regarding betting shops. The methodology was a deductive approach to quantitative research as described by Balnives and Caputi (2001). The deductive approach followed a process of:

(1) THEORY, followed by, (2) METHODOLOGY, followed by, (3) DATA COLLECTION.

This approach was applied to quantitative document analysis of planning appeal decisions.

Boettger and Palmer (2010) describe Conceptual Content Analysis where research methods are used to isolate trends, avoiding preconceived categories but rather allowing the variables to emerge from the document content. For this dissertation, this process was used with a code book or code sheet set up to record the results. Variables were then listed in columns as they emerged from the sample documents and logged against each appeal that was analysed. (See Appendix B)

Shown below is an outline of the research design followed by a detailed explanation of each phase of the research.

5.2 Research Design and Methods

Phase 1:

A random sample of 48 planning appeals relating to betting shops planning applications collected.

Phase 2:

The 48 samples were divided into 'allowed' and 'refused' to calculate appeal success rate as a percentage.

Phase 3:

Successful appeals were analysed to determine:

1. Reasons for original refusal of planning permission.
2. Reasons for each appeal being allowed.

Phase 4:

Data was analysed from 32 allowed appeals to check for trends and common reasons for original planning refusal and reasons for the successful appeal.

Phase 5:

An additional 7 allowed appeals were added to original sample.

Phase 6:

Conclusions were drawn from analysis of the final 39 allowed appeals.

5.3 Research Methods in Detail

Phase 1:

A random sample of 48 planning appeals relating to betting shops planning applications was collected. The appeals were sourced from the website of the Planning Inspectorate in the UK. In order to find suitable appeals, searches were run using the names of four major bookmakers; William Hill, Ladbrokes, Betfred, Coral and Paddy Power. This search criteria returned 48 appeals (allowed and refused) ranging in date from 2011 to 2014. For the broadest possible results, it was decided to include appeals from across England and Wales and not limit the research to a specific region.

Planning appeals were preferred over planning application decisions because the appeals generally describe the main issues in greater detail. The appeals also highlight the issues that appellants have successfully been able to challenge and policies which planning authorities are unable to defend.

Phase 2:

The 48 samples were then divided into 'allowed' and 'refused' to calculate the appeal success rate as a percentage. This percentage was then compared with the overall allowed appeals of all commercial planning applications in England and Wales to see whether betting shop appeals are more or less successful than other commercial appeals.

Phase 3:

Successful appeals were then analysed to determine:

1. Main reasons for original refusal of planning permission.
2. Main reasons for each appeal being allowed.

These reasons were logged on a spreadsheet and are shown in Appendix B. As the appeals were analysed, common trends started to emerge and these were classified as variables in columns.

Phase 4:

The results were then observed from the 32 allowed appeals to identify the trends and common reasons for original planning refusal and reasons for the successful appeal. It was hoped at this point that clear trends would have emerged, and they had, however, a decision was made to increase the sample size to reinforce the findings and to improve the quality of the data.

Phase 5:

An additional 7 allowed appeals were added to original sample. The original search of the Planning Inspectorate website had only returned results of appeals up to 2014, an additional search was needed to bring the results up to the current date. On the advice of the Planning Inspectorate, a search was run using only the word '*betting*'. This additional search was successful in finding the more recent samples and the successful appeals were collected for analysis. The results from the second search took the total of successful appeals to 39. Planning appeals relating to applications after 16 April 2015 were especially significant as this was the date when the Town and Country Planning (Use Classes) (Amendment) (England) Order 2015 and the Town and Country Planning (General Permitted Development) (England) Order come into force. This change in Use Classes applied to betting shops and they were taken out of A2 (financial services) and instead made Sui Generis. This meant that planning permission would be

required for all new betting shops, even these units were just a change of use from an A2 use which would previously have been permitted development. Analysing these allowed appeals would help determine whether or not the use class change had affected the outcomes of betting shop planning appeals.

Phase 6:

Conclusions were drawn from analysis of 39 allowed appeals to determine where planning authorities are most likely to be unable to defend their own policies.

5.4 Data Results, Analysis and Conclusions

The analysis of the 39 successful planning appeals yielded the following results:

85% (33/39) of the cases involved a change of use.

Main reasons for original planning application refusal:

- 69%** (27/39) : Potential harm to the vitality and viability of a town centre.
- 36%** (14/39) : Issues relating to the appearance and character of the town centre.
- 36%** (14/39) : Issues relating to crime, safety, anti-social behaviour, noise and disturbance.
- 18%** (7/39) : Over concentration of use.
- 10%** (4/39) : Issues relating to a heritage asset.
- 8%** (3/39) : Proliferation of betting shops.
- 3%** (1/39) : Safeguarding residential amenity.
- 3%** (1/39) : Highway safety.

Reasons given for appeals being allowed:

- 56%** (22/39) : Increased footfall which contributes to linked trips to other shops.
- 54%** (21/39) : Evidence base for the refusal questioned by the appellant.
- 51%** (20/39) : The proposed betting shop would fill a vacant site.
- 31%** (12/39) : A good mix of retail and non-retail near appeal site and therefore no imbalance.
- 23%** (9/39) : Planning policy was lacking or insubstantial.
- 18%** (7/39) : The proposed betting shops would provide employment.
- 13%** (5/39) : The proposed betting shop would not be out of character in the area.
- 10%** (4/39) : The proposed betting shop would provide surveillance and contribute to security.
- 10%** (4/39) : Noise and disturbance can be dealt with using means other than planning.
- 8%** (3/39) : Unfounded or unsubstantiated claims of over-concentration of betting shops.
- 5%** (2/39) : No compelling evidence of harm to vitality and viability of town centre.
- 5%** (2/39) : Other non-retail units in the vicinity set a precedent for approval.
- 5%** (2/39) : The proposed betting shop would deliver sustainable development.
- 3%** (1/39) : A misinterpretation of a condition attached to a successful planning application.

5.4.1 Analysis of the main reasons for planning application refusal.

Of the eight main reasons listed for original refusal of planning permission, three stand out prominently with high percentages and are noteworthy. The most significant reason (69% of cases) related to concerns over the proposed betting shops' potential to harm the vitality and viability of a town centre or high street. Vitality and viability are not causes in themselves but a result of contributing factors. For the purposes of the research, vitality and viability was a dependant variable. The priority shown to vitality and viability stems from the significance afforded to it in the NPPF. Paragraph 23 of the NPPF highlights the importance of the economic resilience of town centres, for them to be attractive, competitive and providing a diversity of retail that offers good customer choice.

The next two significant reasons (independent variables effecting vitality and viability) relate to (1) the appearance and character of a town centre and (2) issues relating to crime, safety, anti-social behaviour, noise and disturbance. Both of these apply to 36% of the appeals. Issues relating to appearance and character are not generally a concern to the general public and interest groups who oppose betting shop applications. These are mostly architectural issues that can be dealt with by sensitive design and don't impact on social issues. For these reasons, this first issue will not be expanded on any further even though they are within the remit of planning. The second issue, though, emerges as the most common reason for formal public opposition to betting shops. In these cases, the opposition was countered at appeal with claims which included the that assumption that the new betting shop would actually improve security and safety because of passive surveillance offered by patrons of the proposed betting shop as well as CCTV which would be installed by the bookmaker. Noise, it was claimed, could be dealt with by means other than planning and in most cases, the inspector established that the location was already busy and noisy and that the addition of a betting shop (potentially open till late) would not add significantly to the noise already being created.

5.4.2 Analysis of the main reasons for allowing the appeals.

The three most significant reasons given by inspectors which contributed towards appeals being allowed were: (1) new betting shops contributing positively to the footfall on high streets and creating 'linked trips' to other shops; (2) questionable or non-existent evidence (on a variety of matters) from the defending planning authority; and (3) new betting shops contributing positively due to the fact that they would be filling a vacant unit. Positive contribution to footfall was referred to in more than half of the successful appeals with many of the cases being substantiated by evidence presented by the appellant with questionable or no counter evidence provided by the planning authority. Whatever the reasons for the low quality of evidence, this is area of weakness for the planning authorities that could be addressed in order to strengthen appeal defences. West Dunbartonshire Council (2016) and the London Borough of Brent (2014) have produced exemplary and detailed evidence relating to footfall which shows betting shops in comparison to other high street uses and evidence bases like these should be a staple of planning authority documentation. Footfall is not the only issue affected by insubstantial evidence, the research results showed that appellants were able to question evidence on other issues of refusal as well, pointing to a potential advantage that large bookmakers have over local authorities in that they have the resources to assemble the necessary evidence to confidently pursue appeals, even when their intentions are contrary to local planning policy. 51% of successful appeals involved a betting shop filling a formally vacant unit. The simple argument that a shop generating any amount of income and footfall will always be more than nothing (generated from an empty unit), was a

recurring theme which was referred to by inspectors. As discussed earlier, 'Meanwhile' uses present a potential opportunity to councils to block this successful method of overturning planning decisions, which, unlike the issue of footfall, does not require as much evidence to justify by appellants.

In almost a third of successful appeals, appellants were also successfully able to argue that new betting shops would not create an imbalance in the retail / non-retail mix and in some cases, claims of over-concentration were unsubstantiated or unfounded. Here again with both of these issues, a more robust evidence base and more clearly defined policies would help the councils in their defences. In almost a quarter of all successful appeals, insubstantial policy was referred to by inspectors. Also referred to was the positive benefit of employment that new betting shops would bring. Claims of potential noise and disturbance were dismissed in 10% of all appeals as they were deemed to be issues that could be controlled by means other than planning.

5.4.3 Betting shop appeal success compared with to all commercial appeals

A finding of the research was that the number of successful betting shop appeals is higher than the average success rate for all commercial appeals in England and Wales. The initial sample of betting shop appeals were dated from 2009 to 2014. In this period, 65% of the appeals were successful. In contrast, figures provided by the Planning Inspectorate (see Appendix C) show a lower percentage of success for all commercial appeals and are listed below and compared with betting shop appeal results:

All Successful Commercial Appeals from March 2013 to March 2017 (England and Wales).

2013/14:	42%
2014/15:	41%
2015/16:	39%
2016/17:	36% (provisional)
Average:	39.5%

Successful Betting Shop Appeals 2009 to 2014 (England and Wales)

2009 – 2014: **65%**

Unfortunately the Planning Inspectorate were not able to provide figures before 2013 for the commercial appeals and so a time frame overlap for the sake of comparison was not possible with the 2009 – 2014 period relating to the initial sample of betting shop appeals. Also, the limited number of betting shop appeals available in the 2013 – 2017 period meant that it was not possible to obtain a reliable percentage for the sake of an exact comparison for each individual year. However, considering these limitations, the average success rate of betting shop appeals is so much higher than the average commercial success rate that it is worth noting.

5.4.4 Conclusions from the research

A prominent theme that emerges from these results is that councils are weakened at appeal stage by lack of evidence to substantiate planning policy and when policy is challenged with superior evidence by appellants, that policy can be found wanting. This evidence is particularly important in relation to issues such as footfall, achieving a healthy retail / non-retail mix as well as crime, noise and disturbance. The London Boroughs of Brent and Hammersmith & Fulham have shown in recent years how robust policy supported by a substantial, up-to-date evidence base can

regulate and even reverse the proliferation and clustering of betting shops and should be viewed as exemplars for other planning authorities aiming to achieve the same.

Opportunities remain for bookmakers who pursue a deliberate business model of filling vacant units. This expansion model brings with it the related employment and a guaranteed increase in footfall and revenue over any vacant units. It is close to impossible to deny these benefits even in cases like West Dunbartonshire where only 7% of residents surveyed agreed that betting shops were important in filling a vacant unit and 82% agreed that they had a detrimental effect on the vitality and vibrancy of town centres. (West Dunbartonshire, 2016).

Also noteworthy is the high percentage of successful betting shop planning appeals in comparison to the commercial average. This high success rate points either to a very thorough approach to appeals by appellants, an inability by planning authorities to defend their own planning policies, or a combination of the two.

It is possible that councils may be allowing planning permissions in the first place even if they are not contrary to policy simply because there are not the resources to defend a refusal at appeal or to afford the legal costs if an appeal is allowed. This remains speculation as it was not explored as part of this dissertation, but may be an avenue for future research by gauging opinions of planning officers from a variety of planning authorities.

6. Conclusion

6.1 Conclusion on betting shops

This dissertation began with a reference to Graham Jones MP who argued the case in parliament for the Secretary of State for Communities and Local Government to assist local planning authorities by bringing clarity on how to deal with the proliferation and clustering of betting shops. This call for intervention is based on a lack of confidence in the planning system as well as fears about betting shops being associated with crime, social disorder and a perception that bookmakers deliberately target the most vulnerable in society. Research by Griffiths (2011) concludes that there is no empirical evidence to show that betting shops cause crime, however, research from Kumar and Yoshimoto (2016) shows that where crime increases, the number of betting shops increase. Betting shops may not be responsible for causing crime but their numbers increase where crime increases and therefore the two are linked in some way. Research into the link between betting shops in crime is limited and it is difficult to draw confident conclusions at this stage. This topic is therefore an area for further study. Regarding the location of betting shops in relation to social deprivation, evidence from the London Borough of Hammersmith & Fulham show an alarmingly high proportion which are in close proximity to socially deprived areas within the borough. This is only one borough and similar studies will be needed around the country to gain a better understanding in this regard. It is difficult to establish whether or not bookmakers deliberately target the poor, but their strategy of occupying long-term vacant shop units is likely to lead to a higher proportion of betting shops being based in economically depressed areas. Betting shops are not regarded highly when it comes to their impact on individual health and well-being and this is a factor which is being taken into account by planning authorities who are pursuing the intentions of the NPPF regarding health and well-being by factoring this into their policies and supporting documentation regarding betting shops.

The effect of betting shops on the vitality and viability of high streets is the major theme that emerges from the analysis of planning appeals. Evidence produced by some councils show that the footfall generated by betting shops is significantly less than other retail and non-retail high street outlets but the argument from bookmakers is that filling vacant units with betting shops is a 'better-than-nothing' option and is generally looked on favourably by inspectors at the planning appeal stage. This view is reinforced by evidence provided by appellants that the added footfall generated also leads to 'linked trips' to other high street shops and is a theme that recurred in over half of the appeals analysed in this research. It was also argued successfully in 31% of the appeals that betting shops would not disrupt the current retail / non-retail mix in the relating town centre. 'Meanwhile' uses offer a potential solution as a counter to the bookmakers' strategy of occupying vacant high street units. In defence of policy relating to betting shops and in light of the high success rate of bookmakers occupying empty premises, 'meanwhile' uses offer planning authorities a positive, innovative and dynamic option to testing out land uses without long-term consequences.

Another recurring theme that emerged from the research was that local authority planning policy (31% of cases) or evidence in support of policy (54% of cases) was deemed insufficient by inspectors or was non-existent. It is the author's opinion that this is where the crux of the problem exists with regards to the planning response to betting shops. Planning authorities with robust policies and supporting evidence have a higher success rate at appeal and are in a stronger position to implement and defend their policies. They are able to achieve positive planning results which allow betting shops to take their rightful place in the overall mix of high street uses without domination, making a positive contribution to the vitality and viability of high streets as well as to individual health and well-being (which has to be proven in some cases in order to be awarded planning permission). Returning to the plea by Graham Jones MP for clarity or intervention from the Secretary of State, the following recommendations are made by the author: Central government intervention would be helpful in the form of templates or tool kits to be used by local authorities in establishing betting shop-specific planning policy and in writing up supporting documentation. This would ensure a consistent and informed approach to tackling the issue and would assist the most under-resourced councils in at least being able to produce adequate supporting documentation to justify and defend policy at appeal. In addition, a national repository of statistics and evidence would be useful to local authorities and could be set up by the Department for Communities and Local Government. This repository could be populated and updated voluntarily by planning authorities who would submit their own relevant evidence bases and SPDs for reference by others.

The Portas Review (2011) on the health of high streets in the UK made a recommendation that betting shops be taken out of use class A2 (financial services) and be made Sui Generis. Whether it was from this particular recommendation or a culmination of recommendations from various sources, this change came into affect in April 2015. Whilst it was a positive move in giving additional planning powers to local planning authorities in dealing with betting shop planning applications, Hubbard (2016) questions whether this change in use class will actually make any difference. On the basis of the research conducted for this report, this author would agree with that assertion. 85% of all successful appeals that were analysed involved a change of use, but most significantly, 100% of the successful appeals since April 2015 also involved a change of use, showing that the Use Class change had no effect in these cases. Economic and social benefits such as filling a vacant site, offering employment, delivering sustainable development or adding to the

footfall of a high street carried more material weight in the opinion of the inspectors than preserving the existing use of a property, even if protecting such a use was stated in local planning policy. Once again, the importance of relevant policy and supporting evidence is critical in allowing planning authorities to implement and defend policy.

The regime of licensing has been looked at as part of this dissertation to outline the role it plays alongside planning in relation to betting shops. The London Borough of Brent (2014) express their concern that a licensing committee has limited powers to prevent an over-concentration of betting shops and that it is therefore necessary to use the planning system to control these uses. It is possible that licensing authorities may be relying on the powers of planning to control over-concentration, and yet it has been successfully argued at planning appeal that the granting of a license in the first place (which gives a degree of confidence in how a betting shop will be operated) is in itself, a material planning consideration in favour of planning permission being granted. Outside of a legislation change which would give more powers to licensing authorities, a solution to this dilemma may be that greater cooperation is required between licensing and planning departments within any planning authority. In addition, the recommendation from the House of Lords (2017) to transfer licensing responsibilities to planning departments is a radical proposal that offers a rationalisation and simplification of the current status quo of the two regulatory regimes, but may extend the responsibilities of planning too far beyond the realm of its current remit of regulating land use, and may therefore be impractical.

The challenge for planning is to achieve a balance of land uses, especially between retail and non-retail uses, to prevent the over-concentration and proliferation of any uses, protecting viability and vitality of high streets and ensuring that land uses do not compromise personal health and well-being. Betting shops play a legitimate role in the mix of uses on high streets in providing a popular and affordable form of entertainment and a sense of belonging to an imagined community (Cassidy 2014), but this needs to be balanced by their impact on personal health and well-being and their locations relative to those most susceptible to problem gambling. From an economic perspective, bookmakers pursue a business growth model of seeking out vacant high street premises and by doing so, bring added footfall, regeneration and revenue to struggling high streets as well as employment, often to low-skilled workers and others who face the most severe labour market challenges (CEBR 2012). The significant investment into the fit-out of new betting shops offers benefit to the wider economy and in some cases offer much needed refurbishment to neglected shops which may have been vacant for some time. The hypothesis which formed the basis of the research for this dissertation was that local planning authorities are unable, in some cases, to fully implement or enforce their own policies or intentions regarding betting shops. This hypothesis has proved to be true in cases where planning policy or supporting evidence is insufficient. As a result, government intervention would be useful in the forms that were described earlier in the conclusion. The research has shown that robust planning policy and supporting evidence are vital in allowing planning authorities to implement and defend their own policies in order to achieve a sensible and fair number of betting shops amongst other high street uses. The high proportion of successful appeals for refused betting shop planning applications compared with other successful commercial appeals suggests that planning in general is not well enough equipped to deal with the intentions of bookmakers, but the recent national trend toward decline in betting shop numbers and the proactive response by local planning authorities in recent years looks likely to ensure that in the foreseeable future, betting shop proliferation and clustering will continue to decrease.

6.2 Conclusion on personal learning objectives.

Personal learning objectives included gaining a better understanding of planning policy generally, but specifically with regards to betting shops. Analysing policy has proved time-consuming due to the uniqueness of the documentation produced by each planning authority but a greater understanding has been achieved of understanding core policy and development management issues and how these are supported by supplementary documentation. I have also realised how critical a robust evidence base is in supporting planning policy. I have also gained a better understanding of the different but similar roles that licensing and planning play and have a greater understanding of the remit and limits of planning, not just regarding betting shops but for managing land use in general.

Regarding betting shops, the research undertaken has given me a broad view of the topic having had to consider their economic and social benefits as well as their negative impact in situations of over-concentration. The greater understanding I have gained of over-concentration of uses in general has also been of benefit and I have a better understanding of how use-concentration should be approached by planning. My hope is that my understanding of the impact of betting shops clusters and how to develop robust policy and supporting documentation will lead to future opportunities in helping to prepare planning documentation or to be involved in evidence collection. The primary research element of the dissertation has also been valuable in gaining an understanding of quantitative document analysis by applying relevant methodology and being able to design methods specific to the nature of the research.

6.3 Areas for future research

Research by Kumar and Yoshimoto (2016) showed a direct link between the increase in crime and a resulting increase in betting shops. A future area of study would be to investigate the potential link between the increase in betting shops and a resulting increase in crime. Very few studies have been conducted into the association between betting shops and crime and for the sake of evidence, this is a significant area for future research.

It is possible that planning officers are allowing betting shop planning applications even in cases where it is contrary to policy. This may be due to the planning authority not having the resources to defend the policies at appeal to pay legal costs in the event of a successful appeal. This would be a useful avenue of further research to determine if, in some cases, policies cannot be defended successfully and to what extent this problem exists, if at all.

A third avenue for further research would be to investigate the current relationship between licensing and planning departments at a local authority level across a variety of councils, particularly in relation to betting shops. An in-depth study may provide more sophisticated solutions for situations where the responsibilities of the two overlap, creating greater co-operation and a more efficient relationship between the two regimes.

7. Acknowledgements

I would like to thank my tutor, Tim Edmundson for showing such a personal interest in the topic right from the start of the process. The level of guidance that was received based on his years of planning experience was beyond what I had expected, was much appreciated and contributed greatly to my learning experience.

I would also like to thank Martin Gaine of Just Planning who's expert insights and advice on the decoding of planning appeals set the tone for the nature of the primary research for this dissertation. I am also grateful to Emily Berwyn of Meanwhile Space CIC for the advice on interim uses and to Adam Sheppard of the University of the West of England who's initial steering advice at the start of the research process was very valuable. A final word of thanks goes to Gavin Findlay of the Planning Inspectorate who's help was much appreciated in gathering planning appeal statistics.

Word Count: 13,756

Excluding title page and contents.

(word limit 12,000 – 15,000)

8. List of Acronyms

AGC: Adult Gaming Centre

DMDPD: Development Management Development Plan Document

DMP: Development Management Policies

FOBT: Fixed Odds Betting Terminal

GDP: Gross Domestic Product

GGY: Gross Gambling yield

GLA: Greater London Assembly

GVA: Gross Value Added

NPPF: National Planning Policy Framework

PPS: Planning Policy Statement

RSHP: Royal Society for Public Health

SPD: Supplementary Planning Document

TCPA: Town and Country Planning Association

9. List of Figures

Fig. 1: A typical betting shop interior, Edgware Road, London.

Fig. 2: Betting shops operated by the same bookmaker, one shop apart. The Bullring Shopping Centre, Birmingham, UK.

Fig. 3: Betting shops per borough – selected London boroughs.

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11. List of Appendices

- Appendix A: Freedom of information requests for number of betting shops per borough.
- Appendix B: Code sheet for quantitative document analysis.
- Appendix C: Planning Inspectorate – Commercial appeals and advertisement appeals – received, decided and allowed.

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WhatDoTheyKnow

Appendix A

Betting shops

[Chandra Singh](#) made this Freedom of Information request to [Barking and Dagenham Borough Council](#)

Follow

1 follower

The request was **successful**.

Chandra Singh **9 March 2016**

Delivered

Dear Barking and Dagenham Borough Council,

Can you please tell me the number of betting shops in your council area each year from 2000-2015 i.e. yearly count of betting shops from 2000-2015?

Yours faithfully,

Chandra Singh

https://www.whatdotheyknow.com/request/betting_shops_25#outgoing-522958

[Link to this](#)

London Borough of Barking and Dagenham, **9 March 2016**

Information request

Our reference: 836733

Dear Sir/Madam

Freedom of Information Act 2000

Thank you for your request for information that was received on 9 March

2016 concerning Customer wants to know the number of betting shops in the council area.

We are dealing with your request under the Freedom of Information Act 2000 and we aim to send a response by 6 April 2016.

The Freedom of Information Act 2000 may restrict the release of some or all of the information you have requested. We will carry out an assessment and if any exemptions apply to some or all of the information then we might not provide that information to you. We will inform you if this is the case and advise you of your rights to request an internal review and to complain to the Information Commissioner's Office.

We will also advise you if we cannot provide you with the information requested for any other reason together with the reason(s) why and details of how you may appeal (if appropriate).

Yours faithfully

Freedom of Information Team

NOTE: Please do not edit the subject line when replying to this email.

https://www.whatdotheyknow.com/request/betting_shops_25#incoming-779905

[Link to this](#)

London Borough of Barking and Dagenham, **10 March 2016**

Information request
Our reference: 836733

Dear Chandra Singh

Request for information (Ref: 836733)

Your request for information regarding the number of betting shops in your council area each year from 2000-2015 i.e. yearly count of betting shops from 2000-2015?has been considered and we respond as follows:

We are only able to provide you with information for the following years

2008 - 41

2009 - 40

2010 - 39

2011 - 38

2012 - 42

2013 - 41

2014 - 44

2015 - 45

If you need any more information, or if we can be of any further help, please contact us.

If you are not satisfied with the way your request has been dealt with, you can request a review within 40 days of our response to you, by e-mailing [1][Barking and Dagenham Borough Council request email], or in writing to the FOI Team, 2nd Floor Roycraft House, 15 Linton Road, Barking, IG11 8HE.

If you are still not satisfied following the internal review, you can complain to the Information Commissioner, details of which can be found at: [2]<https://www.ico.org.uk/> (<https://www.ico.org.uk/>)

Yours sincerely

The FOI Team

NOTE: Please do not edit the subject line when replying to this email.

References

Visible links

1. [mailto:\[Barking and Dagenham Borough Council request email\]](mailto:[Barking and Dagenham Borough Council request email])
2. <https://www.ico.org.uk/> (<https://www.ico.org.uk/>)

https://www.whatdotheyknow.com/request/betting_shops_25#incoming-780674

Link to this

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Wembley HA9 0FJ
Tel : (020) 8937 5262
EMail : xxxxxx.xxxxx@xxxxx.xxx.xx
Web : www.brent.gov.uk

Mr. Chandra Singh
???

24 March 2016
Ref: 5101796

Dear Mr. Singh

Freedom of Information Act 2000

I can confirm that the information requested is held by Brent Council. I have detailed below the information that is being released to you.

2007	65
2008	72
2009	78
2010	83
2011	87
2012	93
2013	98
2014	99
2015	99

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your original letter and should be addressed to:

Brent Civic Centre
Engineers Way
Wembley HA9 0FJ
xxxxx.xxx@xxxx.xxxxxxxxxxxx

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:
The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.
Phone: 0303 123 1113
Website: www.ico.gov.uk

I will now close your request as of this date.

Yours sincerely

Yogini Patel
Senior Regulatory Service Manager

Year	Total number of betting shops
2005	
2006	
2007	48
2008	52
2009	49
2010	49
2011	46
2012	47
2013	47
2014	49
2015	41

Chandra Singh

By Email: request-319884-1febb726@whatdotheyknow.com

15th March 2016

Environment & Regeneration
Municipal Offices
222 Upper Street
London N1 1XR

T 020 752723216

F 020 75272732

E dawn.forte-khan@islington.gov.uk

W www.islington.gov.uk

Dear Chandra Singh,

Subject: Freedom of Information Request 490609

Thank you for your Freedom of Information request received on the 2nd March 2016.

You requested the following information:

Question1: Please tell me the number of betting shops in your council area each year from 2000-2015 i.e. yearly count of betting shops from 2000-2015?

Response 1: Numbers as follows:

2000-2006 – We do not hold this information – Local Authorities became responsible for licensing betting shops in 2007.

2007 – 74

2008 – 72

2009 -70

2010-71

2011-71

2012-69

2013-71

2014-62

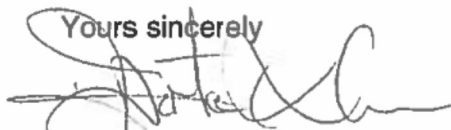
2015-60

2016-61

If you are not satisfied with the way in which your request has been handled or the outcome, you may request an internal review within two calendar months of the date of this response by contacting: Information Complaints, Digital Services, Room G17, Town Hall, Upper Street, London N1 2UD. Email: infocomplaints@islington.gov.uk <<mailto:infocomplaints@islington.gov.uk>>

Further information is also available from the Information Commissioner's Office, at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone: 01625 545 700. Web: www.ico.org.uk <<http://www.ico.org.uk/>>

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dawn Forte-Khan', written over a faint circular stamp.

Dawn Forte-Khan
Environment & Regeneration
Islington Council

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×

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WhatDoTheyKnow

Betting shops

[Chandra Singh](#) made this Freedom of Information request to [Redbridge Borough Council](#)

Follow

1 follower

The request was **successful**.

Chandra Singh **9 March 2016**

Delivered

Dear Redbridge Borough Council,

Can you please tell me the number of betting shops in your council area each year from 2000-2015 i.e. yearly count of betting shops from 2000-2015?

Yours faithfully,

Chandra Singh

https://www.whatdotheyknow.com/request/betting_shops_26#outgoing-522959

[Link to this](#)

FoI (Freedom of Information), Redbridge Borough Council **10 March 2016**

Dear Ms Singh ,

I acknowledge your request for information received on 10th March 2016.

Please be aware that under the Freedom of Information Act 2000 ("the Act") a public body has 20 working days following the date of receipt within which to respond to a request for information.

If appropriate, the information may be provided in paper copy, normal font size. If you require alternative formats, e.g. language, audio, large print, etc. then please let me know.

For your information, the Act defines a number of exemptions that may prevent release of the information you have requested. There will be an assessment and if any of the exemption categories apply then the information will not be released. You will be informed if this is the case, including your rights of appeal.

If the information you request contains reference to a third party then the third party may be consulted prior to a decision being taken on whether or not to release the information to you. You will be informed if this is the case.

There may a fee payable for the information requested. This will be considered and you will be informed if a fee is payable. In this event the fee must be paid before the information is processed and released. The 20 working day time limit referred to above is suspended until receipt of the cleared payment.

The London Borough of Redbridge is in the process of pro-actively publishing the datasets of information that it holds on its website, Redbridge i. Some of the information will be exempt under the Freedom of Information Act 2000 or Data Protection Act 1998, and this will be removed or redacted. You may wish to look at the website to see if the information you are requesting is already available – you can search the datasets using a user friendly tool the London Borough of Redbridge has developed called Datashare and, for your convenience, this is a link to that tool: [1]<http://data.redbridge.gov.uk/> (<http://data.redbridge.gov.uk/>) .

If you have any queries or concerns then please contact the Information Officer at London Borough of Redbridge, 10th Floor, front, Lynton House, 255-259 High Road, Ilford, Essex IG1 1NY,

telephone 0208 708 2331, e-mail [2][Redbridge Borough Council request email]

Further information is also available from the Information Commissioner at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113.

[3]www.ico.org.uk

Yours sincerely,

Shirley Freeland

Business Support Officer

Corporate FOI Team

London Borough of Redbridge

10th Floor, front

Lynton House, 255-259 High Road, Ilford, Essex IG1 1NY

Tel: 020 8708 2331

Email: [4][**email address**]

Web: [5]www.redbridge.gov.uk

Twitter: @RedbridgeLive

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show quoted sections

https://www.whatdotheyknow.com/request/betting_shops_26#incoming-780181

[Link to this](#)

Community Safety (Admin), Redbridge Borough Council **18 March 2016**

Dear Mr/Ms Singh

Your request for information regarding the above has now been considered and the information requested is detailed below.

You asked:

Can you please tell me the number of betting shops in your council area each year from 2000-2015 i.e. yearly count of betting shops from 2000-2015?

Our response:

We do not have figures from 2000 to 2006.

The Gambling Act 2005 was adopted in 2007. Figures from flare as follows:

To 1/9/08 – 59

To 1/9/09 – 64

To 1/9/10 – 65

To 1/9/11 – 66

To 1/9/12 – 72

To 1/9/13 – 53

To 1/9/14 – 56

To 1/9/15 – 57

To 16/3/16 – 58

Please contact me if you have any queries or concerns.

If you are unhappy with the outcome of your request, you may ask for an internal review. Please contact the Information Officer at [1][Redbridge Borough Council request email] or Town Hall, PO Box 2, High Road, Ilford, Essex, IG1 1DD within 20 working days, who will arrange an internal review of your case.

If you have a complaint about the handling of your enquiry then please contact the Information Officer at London Borough of Redbridge, Town Hall, PO Box 2, High Road, Ilford, Essex, telephone 0208 708 2331, e-mail [2][Redbridge Borough Council request email] within 20 working days. If you consider the outcome of the London Borough of Redbridge's complaints procedure is not satisfactory you also have a right of appeal to the Information Commissioner at:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 01625 54 57 45

[3]www.informationcommissioner.gov.uk

Yours sincerely,

Jacquie Fairchild PMICS

Senior Finance Officer / FOI Co-ordinator

Community Safety Service, London Borough of Redbridge

10th Floor Rear, Lynton House, 255-259 High Road, Ilford IG1 1NY

020 8708 5307

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https://www.whatdotheyknow.com/request/betting_shops_26#incoming-784422

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Appendix B

Sheet1

Betting Shop Appeals			Main Reasons for Original Refusal					Crime, safety	Anti social				
ALLOWED			2011 – 2017		Vitality & Viability	Heritage	Protect Appearance	Noise &	Safeguarding	Proliferation	Highway	Over	
Council	Case Number	Bookmaker	Date	Change of Use	of Town Centre	Assets	And Character	disturbance	res amenity		Safety	concentration	
Barking & Dagenham	2204812	PP	27/03/2014	0	0								
Barking & Dagenham	2204759	PP	01/07/2014	0	0		0 as condition						
Barking & Dagenham	2202087	PP	12/12/2013				0 as condition						
Barnet	2215045	WH	13/06/2014	0	0								
Camrathenshire	2229494	WH	25/03/2015	0	0								
Ealing	2158169	LB	20/12/2011	0				0					
Ealing	2213440	WH	17/07/2014	0					0				
Fenland	2143727	WH	21/04/2011	0	0								
Glossop	2183093	-	12/12/2012	0	0	0	0						
Great Yarmouth	2214695	WH	19/06/2014	0	0								
Hounslow	2200982	PP	21/11/2013					0					
Islington	2189530	-	26/06/2013				0 as condition	0				0	
Leeds	2197752	WH	11/11/2013	0	0								
Liverpool	2201034	LB	21/01/2014	0	0	0	0						
Newham	2168137	PP	29/06/2012	0	0			0				0	
Newham	2199906	WH	01/07/2014	0								0	
Nottingham	2196636	LB	11/06/2013	0	0								
Preston	2218031	CR	07/12/2014	0	0							0	
Reading	2228320	WH	16/02/2015	0	0			0					
Redbridge	2200987	PP	12/10/2013					0					
Redbridge	2180279	PP	16/01/2013	0	0		0						
Redbridge	2107449	WH	15/06/2009	0				0					
Rochdale	2223506	CR	18/11/2014	0	0								
Torbay	2166519	WH	03/07/2012	0	0								
Torfaen	2171614	CR	07/10/2012	0	0								
Linked v Waltham Forest	2205847	PP	19/02/2014	0			0	0		0		0	
Waltham Forest	2204805	PP	19/02/2014	0			0	0		0		0	
Waltham Forest	2199214	WH	10/09/2013	0				0					
Wandsworth	2216059	CR	07/07/2014				0						
Wandsworth	2218788	CR	09/01/2014	0	0								
Waverley	2140876	WH	23/02/2011	0	0								
Westminster	2159392	WH	30/11/2011		0		0						
Basingstoke	3134280		22/02/2016	0	0		0						
Islington	3145635		30/08/2016	0	0			0				0	
Lancaster	3157337		26/01/2017	0	0								
Leicester	3139130		07/03/2016	0	0		0	0					
Lewisham	3164936		27/03/2017	0	0	0	0	0			0		
Rotherham	3155713		21/03/2017	0	0	0	0			0			
Waltham Forest	2229533		22/04/2015	0	0			0					
				33	27	4	14	14	1	3	1	7	
				85%	69%	10%	36%	36%	3%	8%	3%	18%	

Insufficient Planning Policy	Good balance of Retail & Non Retail	No Compelling Evidence of harm to V & V	Fill vacant site	Provide surveillance	Footfall & linked trips	Emplymnt	Reasons for Allowing Appeal						
							Question evidence base	Precedent other Non-retail	Deliver sust developmt	Not over cncntrtion	Misinterp of condition	Can be dealt with using other mthds	Not out of character
0	0	0	0	0	0	0	0 anti social	0	0				
							0 footfall			0			
					0		0 vacancy	0 D2		0			
					0		0 resi use						
					0		0 no footfall evid				0		
0													
	0		0		0		0 anti social						
	0				0		0 conc & ftfl, dist						
			0		0		0						
							0 noise & dist						
			0	0			0 conc, non-retail		0	0			
	0				0	0	0 conc						
	0		0		0	0							
					0		0 V & V						
	0		0		0		0 conc						
					0		0 anti social						
			0		0		0 conc						
			0		0	0							
			0		0								
0			0		0	0	0 anti social						
			0		0	0	0 anti social						
0							0 no evidence					0	0
			0		0								
	0		0		0								
	0		0		0								
0	0		0		0								
0	0	0	0	0									
0			0		0								
0			0		0		0					0	0
0	0		0		0	0	0					0	0
	0		0	0			0					0	
9	12	2	20	4	22	7	21	2	2	3	1	4	5
23%	31%	5%	51%	10%	56%	18%	54%	5%	5%	8%	3%	10%	13%

Appendix C

Table 2.7 Commercial appeals and Advertisement appeals - received, decided & allowed

England up to March 2017

Year or Quarter	Commercial appeals service (CAS)				Advertisement appeals			
	received	decided	allowed ¹	allowed ¹ as % of total decided	received	decided	allowed ¹	allowed ¹ as % of total decided
2010/11					825	721	211	29%
2011/12					649	649	182	#NAME?
2012/13					704	540	176	#NAME?
2013/14	91	12	5	42%	423	541	205	#NAME?
2014/15	495	385	156	#NAME?	87	133	53	#NAME?
2015/16	524	412	162	#NAME?	80	75	18	#NAME?
2016/17 ^P	675	566	204	#NAME?	71	92	31	#NAME?

1. Allowed includes split decisions

P Provisional

For information on how to appeal see our website

www.gov.uk/appeal-minor-commercial-development-decision

Source: Planning Inspectorate, PINS Business Intelligence System

Email: statistics@pins.gsi.gov.uk

Last update May-17

Next update May-18