

APPENDIX 1

Evening the odds: curbing the proliferation of betting shops

Supplementary Planning Document

December 2012

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1. Introduction

- 1.1 This Supplementary Planning Document (SPD) explains the Council's overall guidance on addressing the social, economic and health impacts of betting shops (Use Class A2) ensuring local communities have access to thriving high streets with a diverse range of services to meet their needs. It advises on the appropriate location and concentration of such premises.
- 1.2 In its response to the Mary Portas Review¹ the Government highlighted Article 4 Directions as a tool to help local authorities and communities control certain uses such as betting shops, by removing permitted development rights, and requiring a planning application to be made. The National Planning Policy Framework (2012) advises that the use of Article 4 Directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. This SPD is intended to be used alongside an Article 4 Direction that will remove permitted development rights for changes of use to betting shops.
- 1.3 Under the current Use Classes Order (1987), which sets out changes of use that are permitted without planning permission, many high street uses can be converted into betting shops without a grant of permission, including restaurants and cafes (Class A3), drinking establishments (Class A4) and hot food takeaways (Class A5). The proposed Article 4 Direction would remove these permitted development rights and would require planning permission to be sought.
- 1.4 In September 2012 a consultation, from the Department of Communities and Local Government (DCLG), on changes to the Use Classes Order closed. The changes proposed in the consultation paper did not consider betting shops. In response to the consultation Barking and Dagenham Council highlighted its support for the Local Government Association's proposal for a local use class. This would allow local planning authorities (LPAs) to identify specific 'problem uses' and require planning permission for such development. However until the Government acts on this issue an Article 4 Direction is necessary.
- 1.5 This SPD specifically supplements the following policies and objectives of the Local Plan:

Core Strategy (2010)

- **SO.2: Reducing Inequalities and Promoting Community Cohesion**
- **SO.7: Promoting Vibrant Town Centres**

- **SO.13: Improving Health and Wellbeing**
- **CM1: General Principles for Development**
- **CM5: Town Centre Hierarchy**
- **CE1: Vibrant and Prosperous Town Centres**
- **CP1: Vibrant Culture and Tourism**

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**

1.6 The SPD does not have the same status as the development plan but is an important material consideration in the determination of planning applications.

1.7 The provisions of this SPD will be implemented primarily through the development management process and the determination of applications for betting shop development. This document is intended to complement rather than duplicate other planning documents. It should be read in conjunction with the Barking and Dagenham Local Strategic Partnership's Community Strategy and the adopted Local Plan.

Betting shops – a definition

1.8 Betting shops are designated in planning terms as use class A2 Financial and Professional Services under the Town & Country Planning Use Classes Order (1987). Betting shops also require a premises license under the Gambling Act (2005), which is administered by the Council.

1.9 Under their license terms, the definition of a betting shop is that the primary activity on the premises must be betting services. Each premises is permitted to have up to four gaming machines, known as fixed odds betting terminals. Additional licenses may be required for the use of other betting mediums to lay bets such as betting websites. The license is valid for an indefinite period once granted, and can only be repealed if the proprietor breaks the terms and conditions of their license, or fails to pay their annual fee.

2. Status

- 2.1** This guidance has been put together in accordance with the National Planning Policy Framework (NPPF, 2012). The statutory Development Plan is the starting point when determining a planning application for the development or use of land. The Development Plan consists of the London Plan (2011) and the development plan documents within the London Borough of Barking and Dagenham's Local Plan.
- 2.2** This SPD provides further detail on the implementation of Local Plan policy that applicants must follow to ensure they meet the policy requirements.

3. Planning policy framework

- 3.1** This Supplementary Planning Document (SPD) has been prepared by the London Borough of Barking and Dagenham to address the social, economic and health impacts of betting shops on places and people. The guidance seeks to encourage a diversity of high street uses and facilitate safe and thriving town centres. It draws upon national and regional planning policy guidance and expands on local policies in the Local Plan.
- 3.2** There are 50 betting shops in Barking and Dagenham, which represents the sixth highest concentration of betting shops in London per capita. The Council considers that in the interests of the social and economic welfare, and health, of the borough's residents and the vitality and viability of its town centres that, this proliferation needs to be carefully controlled. It is for this reason that the Council has decided to provide further guidance on the location and concentration of betting shops.
- 3.3** The National Planning Policy Framework (NPPF) recognises the role planning takes in addressing social deprivation, supporting the vitality of town centres and promoting healthy communities. Paragraph 23 states that LPAs should recognise town centres as the heart of their communities and pursue policies to support their viability and vitality. LPAs should set out policies that make clear which uses will be permitted in such locations, and promote competitive town centres that provide a diverse retail offer which reflects the individuality of a town centre².
- 3.4** Supporting social and economic welfare is at the heart of the town planning system. Facilitating the creation of sustainable, thriving communities is fundamental to the spatial planning approach. The NPPF, published in April 2012, recognises for the first time the role of planning policies and decisions in promoting healthy and inclusive communities³, as set out under Core Principle 8: *Promoting healthy communities*. The use of Article 4 directions, to remove permitted development rights is given, in paragraph 200 of the NPPF, as a tool

which Local Planning Authorities should consider using in situations where it is necessary to protect local amenity or the wellbeing of the area.

- 3.5** This follows a wider Government recognition of the importance of lifestyle-driven health problems. The White Paper *Healthy Lives, Healthy People* (2010)⁴ recognises that people's lifestyles play an important role in health and health improvement. Many premature deaths and illnesses could be avoided by improving lifestyles⁵. The White Paper also recognises that improvements to the environment in which people live can make healthy lifestyles easier. It further states that lower socioeconomic groups and those living in the more deprived areas experience the greatest environmental burdens⁶.
- 3.6** The NPPF seeks to empower local planning authorities to create thriving and safe high streets which provide local communities with a diverse offer of retail and services. Core Principle 2: *Ensuring the vitality of town centres*, of the NPPF states that planning should not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives⁷. Paragraph 69 of the NPPF requires planning policies and decisions to create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion⁸. The proliferation and clustering of betting shops has the potential to undermine not only the quality of life for local residents but to degrade the vitality and diversity of the borough's high streets. Paragraph 161 of the NPPF states that LPAs should use up-to-date and relevant evidence to assess locations of deprivation which may benefit from remedial action⁹. Furthermore, paragraph 157 requires local plans to identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with clear explanation¹⁰. National guidance also requires planning policies and decisions to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, as set out in Paragraph 70 of the NPPF¹¹.
- 3.7** Regional guidance under the Greater London Authorities (GLA) Best Practice Guidance – *Health Issues in Planning* (2007) emphasises the link between planning and health outcomes¹². The guidance highlights the importance of putting physical, mental and community health objectives at the centre of plan making and planning decisions.
- 3.8** A key economic policy objective of the London Plan (2011) is to address areas of deprivation across the city¹³. Policy 3.1: *Ensuring Equal Life Chances for All* states the need to address the barriers to meeting the needs of particular groups and communities. Policy 3.1 requires development proposals to protect and enhance facilities and services that meet the needs of particular groups and communities. Further to this, Policy 3.2: *Improving Health and Addressing Health*

Inequalities sets out the Mayor's determination to create healthy places for all – from homes to neighbourhoods. This should be achieved through a range of measures including 'promoting a strong and diverse economy providing opportunities for all.'

3.9 The London Plan also seeks to ensure that local planning policies and decisions maintain and enhance the vitality of high streets and diversity of services for local communities. Policy 4.7: *Retail and Town Centre Development*, states that LPAs should take a strong, partnership approach to assessing town centre needs, and that Local Plans should include mechanisms to undertake regular town centre health checks to inform strategic and local policy and implementation.

3.10 Policy 7.1: *Building London's Neighbourhoods and Communities*, of the London Plan, seeks to ensure that communities have access to a good quality environment. The policy states that development should:

- Enable people to live healthy, active lives
- Maximise the opportunity for community diversity, inclusion and cohesion
- Contribute to people's sense of place, safety and security
- Meet the needs of the community at all stages of people's lives

3.11 A study by the GLA into London's high streets in July 2012¹⁴ found that in recent years there has been an increase in particular services on London's high streets, including betting shops, payday loan stores, pawnbrokers and fast food takeaways. This has led to concerns about a lack of diversity on the high street. London Plan Policy 4.8: *Supporting a Successful and Diverse Retail Sector* states that boroughs should support a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need. Local Plans should support convenience retail and develop policies to prevent the loss of retail and related facilities that provide essential convenience and specialist shopping.

3.12 This SPD seeks to complement existing policies contained within the adopted Local Plan. Policy BE1: Protection of Retail Uses, of the Borough Wide Development Policies DPD seeks to protect retail uses. Under current permitted development rights contained within the Town and Country Planning Use Classes Order (1987), a wide range of high street uses can be converted into betting shops without the need for planning permission.

Uses which do not require planning permission to become betting shops include:

- A2 uses (Financial and Professional Services)
- A3 uses (Food and Drink)
- A4 uses (Drinking Establishments)
- A5 uses (Hot Food Takeaways)

Due to this wide scope for betting shop development, the Council considers that separate policy guidance is required to control their proliferation and clustering.

- 3.13** Policy BE2: Development in Town Centres, of the Borough Wide Development Policies DPD promotes development in town centres that will bring vitality, viability and regeneration benefits. All development in town centres is required to meet a series of design criteria including 'not to be detrimental to the visual and/or environmental character and amenity of the area' this includes reference to general disturbance.
- 3.14** The Local Plan also considers the health impacts of development. Policy BC10 sets out the Council's commitment to working with NHS Barking and Dagenham to improve the health of the local population and reduce health inequalities. This builds on Strategic Objective 13 which seeks to improve the health and well being of residents and reducing health inequalities.
- 3.15** The Localism Act (2011)¹⁵ enshrined the Government's commitment to devolve planning powers to the lowest possible level. The borough of Barking and Dagenham has the sixth highest number of betting shops in London per capita, with 50 premises currently licensed. In seeking to address a local planning issue, this SPD therefore seeks to help to deliver the Government's localism agenda.
- 3.16** This SPD is part of a broader strategy to tackle social, economic and health issues in Barking and Dagenham. Improving the economic prosperity, social wellbeing and health of the borough's residents is a cross cutting policy incorporated within a number of objectives in the adopted Local Plan. This SPD seeks to reduce the proliferation of betting shops across the borough, and will be used to inform local master-planning and regeneration strategies. This SPD aims to improve the economic prosperity, social wellbeing and health of the borough's population and safeguard and enhance the vitality of the borough's town centres by reducing the prevalence and clustering of betting shops.

4. Consultation

- 4.1 The consultation on this Draft SPD is in line with Barking and Dagenham's Statement of Community Involvement and runs from **XX January 2012** to **XX February 2013**.

Copies are available on the Barking and Dagenham website at <http://barking-dagenham.limehouse.co.uk/portal/>

Alternatively, you can request a copy by emailing planningpolicy@lbbd.gov.uk or writing to:

Dal Farah
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London Borough of Barking and Dagenham
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Responses can be made online at <http://barking-dagenham.limehouse.co.uk/portal/>, sent by email to planningpolicy@lbbd.gov.uk or by post to the above address

5. Purpose and scope

Evening the Odds: Examining the impact of betting shops in Barking and Dagenham

- 5.1** The proliferation of betting shops in town centres has become increasingly recognised as a challenge for local councils across the UK. There are 8,400 betting shops in the UK¹⁶ and the Government estimates that there are approximately 250,000 problem gamblers¹⁷. Problem gambling is seen as a health disorder and has been identified as ‘gambling that compromises, disrupts or damages family, employment, personal or recreational pursuits’¹⁸. Groups at risk of becoming problem gamblers include minority ethnic groups, those from lower socio-economic groups, those with existing mental health or substance misuse problems and adolescents¹⁹.
- 5.2** Research by the Gambling Commission concurs with this local NHS evidence²⁰. A 2010 report found higher than average rates of problem gambling amongst young adults, minority ethnic groups, the unemployed, those with severe financial difficulties and those who drank the highest amount of alcohol²¹. This evidence is particularly pertinent given Barking and Dagenham’s socio-economic and demographic profile. Can it be considered a coincidence that Barking and Dagenham, which has a disproportionately high proportion of these groups, also has a disproportionately high number of betting shops?
- 5.3** Gambling addiction has been linked to a range of health and social problems including alcoholism, substance abuse and crime. Rates of depression and attempted suicide among problem gamblers are around twice the national average²², and problem gambling has been linked to mental health issues such as anti-social personality disorders and phobias²³. There is also a link between domestic violence and gambling – a finding which is significant given that Barking and Dagenham has the highest reported domestic violence incidence rate in London²⁴.
- 5.4** There is evidence to suggest that the growth of betting shops is particularly prominent in areas with high levels of social and economic deprivation²⁵. This is significant, as the level of problem gambling within a community is known to be linked to the available opportunities to gamble²⁶. Barking and Dagenham has one of London’s highest concentrations of betting shops per capita. Other east London boroughs with notable concentrations of betting shops include Newham, Haringey and Hackney. A commonality with Barking and Dagenham is that these local authorities rank amongst London’s most deprived boroughs¹. Barking and Dagenham has the lowest gross

¹ Barking and Dagenham is the seventh most deprived of London’s 33 boroughs and 22nd most deprived of England’s 354 local authorities. More than one in ten of the Borough’s residents live in wards which fall within the 10% most deprived in England. Unemployment in Barking and Dagenham is 12.4%; this is 25% higher than the London average and 35%

weekly earnings across all London boroughs. Betting shops rely on customers losing money. It may therefore seem irrational for Barking and Dagenham to have one of the highest concentrations of betting shops in London. Perhaps then it could be expected that betting shops would be more prevalent in those boroughs with the highest disposable incomes. Evidence however indicates that this is not the case²⁷. Analysis by Geofutures reveals that betting shops cluster in those town centres across Great Britain where residents are on the lowest incomes and in areas where those who can least afford to spend money on an activity which is loss making²⁸.

- 5.5** What explanation can there be for this? It should be recognised that betting is a popular pastime of the working class. A traditional pastime which, for those who know the risks involved, gambling is regarded as an affordable and entertaining leisure activity. The clustering of bookmakers in areas of greatest deprivation could therefore be seen as the market responding to this recognised customer base. Yet, such areas are also those locations where the most susceptible to harm from gambling reside²⁹. People on the lowest incomes are more vulnerable to gambling, whether this is due to their financial predicament, their health or their knowledge of the risks and dangers involved³⁰.
- 5.6** The Gambling Act 2005 limits the number of Fixed Odds Betting Terminals (B2 gaming machines or FOBT) per shop. This is currently set at four per premises. Bookmakers derive over 40% of their profits from these machines and less from traditional gambling, like horseracing³¹. A means around the FOBT limit is to open another Betting Shop. This has led to the clustering of betting shops, this may explain why in Barking Town Centre there are premises of the same chain in close proximity. Again, it could be argued that bookmakers are simply satisfying customer demand. Whilst this is true, when that demand may be due to an addiction it is a pattern that cannot be ignored. Clustering also increases the likelihood of anti-social behaviour and impacts on the diversity of the high street which in turn is to the detriment of vitality and viability³². Nowhere is this better illustrated in Barking and Dagenham than on Station Parade, an important gateway into the borough and for those arriving from Barking Station the first impression of Barking Town Centre. The close proximity of three betting shops on Station Parade creates an intimidating environment which detracts from the ambiance of the high street and is not providing a fitting arrival for what is a Major Centre.
- 5.7** While Barking and Dagenham is not deprived *because* it has a high prevalence of betting shops, they are a visible symptom of deprivation. Betting shops do not contribute to the Council's number one priority which is raising household incomes, clearly they do the

higher than the UK average. The proportion of those reliant on welfare support is also high, with 6% of borough residents on out-of-work benefits; 32% higher than the London average and 37% higher than the UK average.

opposite². On this basis doing nothing is not an option. The Council has a duty to use its planning powers to control the proliferation of betting shops.

- 5.8** The concentration and clustering of betting shops in the borough's parades also has a detrimental effect on the diversity and therefore the health of the high street. This proliferation is evidenced in consecutive retail studies that have been conducted in the borough in 2006, 2009 and 2012. Each study has found an over representation of betting shops. This disproportionate representation of betting shops, if left unchecked, will impact on the mix of retailers on our high streets. For such centres and parades to be successful it is imperative that there are a range of retailers providing a breadth of products to encourage a diverse customer base, increased footfall and to sustain the life of the borough's high street.

How planning can control the proliferation of betting shops in Barking and Dagenham.

- 5.9** In July 2012 the London Assembly's Economy Committee launched an investigation into empty shops on London's high streets³³. The briefing highlighted the issue of the clustering of betting shops and the Mayor's pledge to lobby the Government to give local Council's greater control over their proliferation. In 2009 the London Borough of Lewisham sought powers to set a cap on the number of betting shops in the borough and to require planning permission for new premises. Lewisham Council were attempting to use powers under the Sustainable Communities Act (2007) but the proposal was not taken forward by the DCLG. Several other London boroughs, including Hackney and Haringey, have raised the issue of the proliferation of betting shops and Council Members have sought greater local planning powers to control and reduce their concentration.
- 5.10** Members of Parliament have also put forward a private members Bill. The Betting Shops Bill (2010-2012) proposed an amendment to the Town and Country Planning (Use Classes) Order to create a separate use class for betting shops. It also sought the ability to allow LPAs to assess demand for betting shops and place a cap on the number of these premises for which planning permission may be granted in any area³⁴. However, the Bill failed to complete its passage through Parliament.
- 5.11** The Portas Review (2011) into the future of the UK's high streets included a recommendation to put betting shops into a separate use

² Data from national charity the Consumer Credit Counselling Service (CCCS) indicates that residents in Barking and Dagenham have the third highest monthly debt problems of all London boroughs. Debtors from the borough have an average monthly household deficit of £80 and an average unsecured debt of over £16,000. Barking and Dagenham also has the highest proportion of debtors in mortgage arrears and the highest rate of repossession in England.

class category³⁵. Following the Portas Review, the Government published *High Streets at the Heart of our Communities: the Government's Response to the Mary Portas Review*³⁶. In this document the use of an Article 4 Direction was highlighted as the appropriate tool for controlling certain uses such as betting shops, by removing their permitted development rights, and requiring a planning application to be made.

- 5.12** The London Borough of Barking and Dagenham has produced this SPD and its corresponding Article 4 Direction in response to the Government's assertion that this is the correct means of controlling betting shops.

6. The guidance

SPD Implementation Point 1 – Preserving High Street Diversity

Planning permission for new betting shops will not be granted in the betting shop exclusion zone. This is where proposals:

- **Fall within 400m of the boundary of an existing permitted betting shop**

The betting shop exclusion zone is detailed in Figure 1.

REASONED JUSTIFICATION

- 6.1** The London Borough of Barking and Dagenham has the sixth highest concentration of betting shops in London per capita. There are currently 50 licensed premises across the borough and notable concentrations within Barking Town Centre, Dagenham Heathway, Chadwell Heath and the shopping parades of the Becontree Estate.
- 6.2** Research indicates that betting shops are part of a wider degradation of high street diversity and vitality since the onset of the recession³⁷. Successive high street surveys of the borough have found an over representation of particular services, with betting shops consistently over represented. Local retail health checks, which look at the composition of high street services, have consistently identified the issue of the over and under representation of particular premises across Barking and Dagenham in the past few years³⁸. The overrepresentation of particular services such as betting shops is not desirable in terms of trying to sustain the viability and vitality of the borough's centres. The borough retail study also confirmed that the over representation of betting shops, and other services such as hot food take aways, is especially strong amongst centres in the most deprived parts of the borough³⁹.
- 6.3** The Council considers that limiting the proliferation of betting shops within the borough is an important component of Barking and Dagenham's strategic health and regeneration initiatives. A betting shop exclusion zone is particularly important considering the borough's high proportion of groups deemed to be vulnerable to problem gambling – minority ethnic groups and those from lower socio economic groups. The exclusion zone is set at 400m, this is considered to be a sufficient distance to prevent clustering and proliferation within the borough's town centres. The Urban Design Compendium (2000)⁴⁰, a recognised and well referenced guide, advises that '*a widely used benchmark is for mixed development neighbourhoods to cover a 400m radius, equating to about five minutes walk*'.

SPD Implementation Point 2 – Concentration and Clustering

Planning permission will only be granted for a betting shop outside of the betting shop exclusion zone provided that:

- **It is within Barking Town Centre, or Dagenham Heathway, Chadwell Heath and Green Lane District Centres or one of the Neighbourhood Centres.**
- **It will lead to no more than 5% of the units within the centre or frontage being betting shops.**

Basis for Calculation

The percentage is based on the measured frontage in relation to both:

- **The proportion of non-A1 uses in each identified primary or secondary frontage.**
- **The proportion of non-A1 uses across the entire primary frontages, secondary frontages or neighbourhood frontages in question.**

For Neighbourhood Centres, the percentage calculation is solely based on the proportion of non-A1 uses in the entire shopping area.

The location and boundaries of the District and Neighbourhood Centres are detailed in Figure 1.

REASONED JUSTIFICATION

- 6.4** In accordance with Borough Wide Development Planning Policy BE3, new retail development is expected to be located in the town centres set out in Core Strategy Policy CM5.
- 6.5** Borough Wide Development Policy BE3 makes it clear that planning permission for retail development outside or on the edge of a town centre will only be granted where it can be demonstrated that it benefits the existing community and fits in with planning objectives. Therefore, betting shops will not be permitted outside the borough's town centres. Within the borough's town centres betting shops will be allowed outside the exclusion zone provided they satisfy the criteria set out in this SPD.

- 6.6** The prevalence of betting shops displaces other high street uses and impacts on the vitality of designated town and neighbourhood centres. The clustering of betting shops, such as in Barking Town Centre, creates an intimidating environment and detracts from the high street ambiance the Council is trying to achieve.
- 6.7** As discussed in Section 5 of this SPD, the level of problem gambling within a community is known to be linked to available opportunities to gamble⁴¹. The over representation of betting shops in deprived wards not only restricts the retail choices available to local communities, but can also have a damaging effect on their health and finances. With a high number of the borough's residents in financial difficulty, high levels of unemployment and personal debt, the ability to quickly spend large sums of money in betting shops could be considered to be a contributory factor in maintaining a detrimental behavioural spiral towards ill health and other social problems.
- 6.8** Consequently, to ensure that shopping areas are diverse and balanced, especially in designated centres, applications for betting shops will be assessed for their cumulative impact.

7. Strategic working

- 7.1** In tandem with this guidance the Council and its partners are implementing a number of initiatives to help improve the economic and social prosperity, and health, of the borough's residents.

Council Property and Regeneration

- 7.2** The Council is a major property owner and this includes a significant number of shop units. Notwithstanding that many of these units are let on long leases, where opportunities arise, the Council will work with landlords to reduce the number of betting shops in its properties. Where the Council is a partner in new developments it will look to limit the opportunities for new betting shops, for example through the use of conditions or covenants as appropriate.

Council's Licensing Authority

- 7.3** Whilst this guidance will help restrict opportunities for new betting shops to establish themselves in the borough the reality is that many of Barking and Dagenham's centres already have notable concentrations of betting shops. Therefore, the Council and the Trading Standards and Licensing team will look closely at existing licensed premises, and work closely with the Gambling Commission to ensure any breach of license conditions is fully investigated and appropriate remedial action is taken.

- 7.4** In cases where there is evidence to suggest that gambling at one of the premises is a source of crime and disorder, or that the premises is associated or used to support crime and disorder, the Council will seek to use its powers as the licensing authority under the Gambling Act (2005) to revoke the license. Equally if there is evidence to suggest that the betting shop is failing to meet any other of its licensing objectives the Council will seek to revoke the license. Other breaches (in addition to failing to pay the license fee) which can justify the revocation of a premises' license under the Gambling Act (2005) include:
- Children and other vulnerable people are being harmed or exploited by gambling
 - Gambling is not being conducted in a fair and open way
- 7.5** The Council's Licensing Authority will ensure that current licensed betting shops provide better access to information about the issues on gambling, debt and the services available to assist and support those with gambling addiction.

NHS and Adult and Community Services

- 7.6** The Council will work with NHS Barking and Dagenham and Adult and Community Services to improve access to counselling, group support and other related services for problem gamblers in the borough. Due to the links between problem gambling and a wide range of other addictions and mental and physical health problems, the Council will ensure that partnership working extends across all relevant services, including the voluntary sector. This includes, but is not limited to; gambling addiction counselling, debt counselling and advice, alcohol and drug services, and adult mental health services.

8. Monitoring, Implementation and Review

Monitoring

- 8.1** Preparation of Local Plan documents is not a once and for all activity. It is essential to check that the SPD is being implemented correctly, that the desired outcomes are being achieved and if not, what corrective action needs to be under taken.
- 8.2** This will be done through a regular process of monitoring in partnership with the Licensing and Trading Standards, Development Management and NHS teams, the success of the SPD and its policies against a set of indicators and targets in the Annual Monitoring Report.

8.3 Such indicators may include:

- The total number and concentration of betting shops in the borough
- The attractiveness and diversity of the borough's high street offer in Town Centre Health Checks and Retail Study updates
- Levels of problem gambling and personal debt in the borough
- Success at appeal

Implementation

8.4 The SPD will be primarily implemented through the development management process and the determination of planning applications. The SPD does not have the status of the development plan, but it will be an important material consideration in determining planning applications.

Review

8.5 The Council's Annual Monitoring Report will highlight any issues that may need a review.

8.6 Changes in National or Regional Planning Policy or progress on Development Plan Documents, which form a part of the Local Development Framework, may also prompt the need for further reviews.

9. References

¹ DCLG, High Streets at the Heart of our Communities, the Government's Response to the Mary Portas Review, March 2012,

² DCLG, National Planning Policy Framework, March 2012

³ DCLG, National Planning Policy Framework, March 2012, p,17

⁴ HM Government, Healthy Lives, Healthy People: Our strategy for public health in England, November 2010

⁵ HM Government, White Paper - Healthy Lives, Healthy People: Our strategy for public health in England, November 2010, p.19.

⁶ HM Government, White Paper - Healthy Lives, Healthy People: Our strategy for public health in England, November 2010, p.20.

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- ⁷ DCLG, National Planning Policy Framework, p.5, 2012
- ⁸ DCLG, National Planning Policy Framework, p.17, 2012
- ⁹ DCLG, National Planning Policy Framework, p.39, 2012
- ¹⁰ DCLG, National Planning Policy Framework, p.38, 2012
- ¹¹ DCLG, National Planning Policy Framework, p.17, 2012
- ¹² GLA, Health Issues in Planning, Best Practice Guidance, June 2007
- ¹³ GLA, The London Plan: Spatial Development Strategy for Greater London, July 2011
- ¹⁴ London Assembly, Economy Committee, London's High Streets: bringing empty shops back into use, July 2012
- ¹⁵ Localism Act, 2011
- ¹⁶ Gambling Commission, September 2012
- ¹⁷ NHS. Gambling addiction. Available online at:
<http://www.nhs.uk/Livewell/addiction/Pages/gamblingaddiction.aspx>
(accessed 27/09/2012)
- ¹⁸ Griffiths, M. "Gambling addiction and its treatment within the NHS: A guide for healthcare professionals" British Medical Association, London (2007)
- ¹⁹ NHS Barking and Dagenham, Gambling and Health, September 2012
- ²⁰ NHS Barking and Dagenham, Gambling and Health, September 2012
- ²¹ British Gambling Prevalence Survey, National Centre for Social Research, p.89, p.90, p.92, p.104, 2010
- ²² NHS. Gambling addiction. Available online at:
<http://www.nhs.uk/Livewell/addiction/Pages/gamblingaddiction.aspx>
(accessed 27/09/2012)
- ²³ NHS Barking and Dagenham, Gambling and Health, September 2012
- ²⁴ Barking and Dagenham Partnership, Joint Strategic Needs Assessment, Incidents of domestic abuse and violence. Available online at:
<http://www.barkinganddagenhamjsna.org.uk/Section6/Pages/Section6-6.aspx> (accessed 27/09/2012)

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- ²⁵ Geofutures, Britain's High Street Gamble. Available online at: <http://www.geofutures.com/2012/07/channel-4-dispatches-geofutures-data/> (accessed 20/08/2012)
- ²⁶ Griffiths M, "Problem gambling", The Psychologist: Bulletin of the British Psychological Society 16: 582-84 (2003)
- ²⁷ Geofutures, Britain's High Street Gamble. Available online at: <http://www.geofutures.com/2012/07/channel-4-dispatches-geofutures-data/> (accessed 20/08/2012)
- ²⁸ Heather Wardle, Research Director, Health and Wellbeing, NatCen, Betting shops blighting the high street? How, why and where and why? Available online at: <http://map.geofutures.com/dispatches/cutting/28/NatCenGamblingHarmCommentary.pdf> (accessed 20/08/2012)
- ²⁹ Heather Wardle, Research Director, Health and Wellbeing, NatCen, Betting shops blighting the high street? How, why and where and why? Available online at: <http://map.geofutures.com/dispatches/cutting/28/NatCenGamblingHarmCommentary.pdf> (accessed 20/08/2012)
- ³⁰ NHS Barking and Dagenham, Gambling and Health, September 2012
- ³¹ The Problem of Betting Shops Blighting High Streets and Communities in Low-Income Areas, <http://www.gamblingcommission.gov.uk/pdf/Gambling%20Industry%20Statistics%202009%202010%20update%20-%20July%202011.pdf> (accessed 10/10/2012)
- ³² Community, The Union for Life, Anti-Social Behaviour in and around betting shops, <http://www.community-tu.org/information/104365/numbers/> (accessed 10/10/2012)
- ³³ London Assembly, Economy Committee, London's High Streets: bringing empty shops back into use, July 2012
- ³⁴ Betting Shops Bill 2010-12, Private Members' Bill, Sponsor, Dame Joan Ruddock. Available online at: <http://services.parliament.uk/bills/2010-12/bettingshops.html> (accessed 27/09/2012)
- ³⁵ The Portas Review: An independent review into the future of our high streets, Recommendation 13, 2011
- ³⁶ DCLG, High Streets at the Heart of our Communities, the Government's Response to the Mary Portas Review, March 2012,
- ³⁷ London Assembly, Economy Committee, London's High Streets: bringing empty shops back into use, July 2012

³⁸ London Borough of Barking and Dagenham Neighbourhood Health Check, 2006, Atkins, p.4-3

Barking Town Centre Retail Study: Update 2009, King Sturge, May 2009, p.27

Barking Town Centre Retail Study: Update 2012, Jones Lang LaSalle, February 2012, p.28

³⁹ London Borough of Barking and Dagenham Neighbourhood Health Check, 2006, Atkins, p.4-3

⁴⁰ The Urban Design Compendium, 2000 (p.41)

⁴¹ Griffiths M, "Problem gambling", The Psychologist: Bulletin of the British Psychological Society 16: 582-84 (2003)