



Final report of the Casino Advisory Panel

Recommendations to the Secretary of State for Culture
Media and Sport on locations for one regional, eight
large and eight small casinos allowed under section 175
of the Gambling Act 2005

30 JANUARY 2007

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NB: This report and many of the related documents can be found on the Casino Advisory Panel website at <http://www.culture.gov.uk/cap/>

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Preface

This document constitutes the final report of the Casino Advisory Panel to the Secretary of State for Culture, Media and Sport (DCMS) and discharges the Panel's duties conferred on it by her.

Much of our report is of an historical nature, charting the progress of our work from our appointment on 1 October 2005 to the formulation of our conclusions and recommendations in this report.

Elsewhere in our report, we make some general findings, concerning such matters as our views on what might constitute the best possible test of social impact and the relationship between a casino development and the likelihood of it becoming a catalyst for regeneration on a larger scale. Then we give a brief appraisal of all the proposals that remained before us to the end and finally our recommendations for the location of the seventeen casinos to be permitted.

In the course of our fact finding in relation to the proposals selected for further examination, a very large amount of evidence was amassed. Inevitably it is impossible to record every bit of relevant evidence in this report. Nevertheless, all relevant evidence has been considered even though it has been possible only to mention the most persuasive elements in our analysis of the proposals concerned.

I would like to extend my thanks to the other members of the Casino Advisory Panel, and to the members of the Secretariat who supported us, for their hard work, dedication and commitment throughout the process.



Professor H. Stephen Crow CB

Summary

Process

- The Casino Advisory Panel was set up by the Secretary for State for Culture Media and Sport to make recommendations to her on where new casinos (one regional, eight large and eight small) allowed by the Gambling Act 2005 should be located.
- The Panel called for proposals from local authorities in January 2006. In May 2006 the Panel issued a provisional shortlist of proposals for further examination on which it then collected further written and oral evidence. That included, in August and September 2006, a round of examinations in public for the seven areas shortlisted for the regional casino. The Panel moved to final consideration and evaluation of that evidence and its recommendation making and report writing phase in the final quarter of 2006.

Recommended area for a regional casino

- After careful consideration of the proposals and all the relevant evidence against our remitted criteria, we recommend that the area in which a regional casino should be licensed is the City of Manchester.

Recommended areas for eight large casinos

- After careful consideration of the proposals and all the relevant evidence against our remitted criteria, we recommend that the areas in which large casinos should be licensed are:
 - Borough of Great Yarmouth
 - City of Kingston-upon-Hull
 - City of Leeds
 - Borough of Middlesbrough
 - City of Milton Keynes
 - London Borough of Newham
 - Borough of Solihull
 - City of Southampton

Recommended areas for eight small casinos

- After careful consideration of the proposals and all the relevant evidence against our remitted criteria, we recommend that the areas in which small casinos should be licensed are:
 - Bath and North East Somerset District
 - Dumfries and Galloway District
 - East Lindsey District
 - Borough of Luton
 - Borough of Scarborough
 - County Borough of Swansea
 - Borough of Torbay
 - Metropolitan Borough of Wolverhampton

The type and geographical distribution of all the recommended proposals is illustrated on the following map.

Map of recommended areas

■ Regional casino

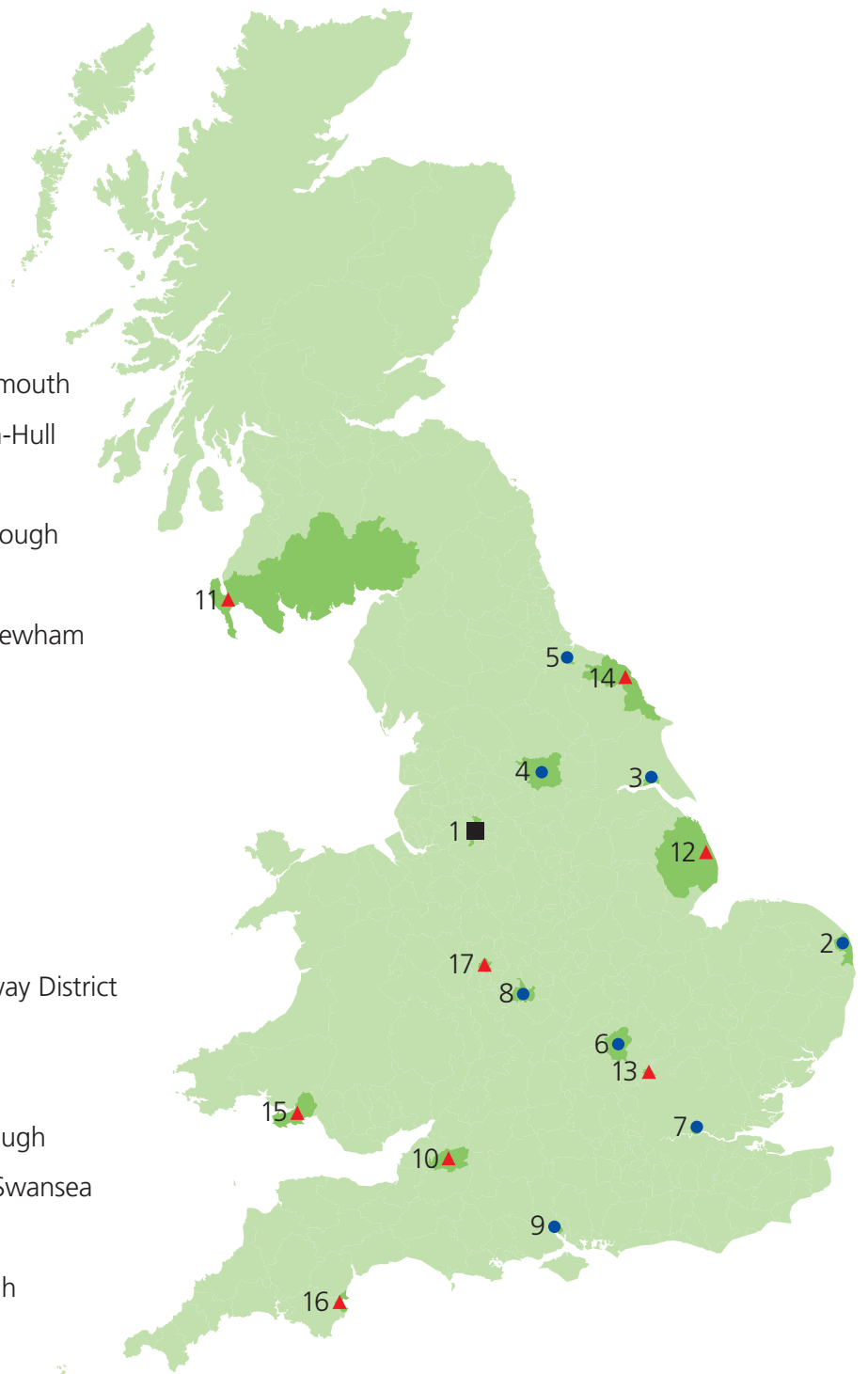
- 1 City of Manchester

● Large casinos

- 2 Borough of Great Yarmouth
- 3 City of Kingston-upon-Hull
- 4 City of Leeds
- 5 Borough of Middlesbrough
- 6 City of Milton Keynes
- 7 London Borough of Newham
- 8 Borough of Solihull
- 9 City of Southampton

▲ Small casinos

- 10 Bath and North East Somerset District
- 11 Dumfries and Galloway District
- 12 East Lindsey District
- 13 Borough of Luton
- 14 Borough of Scarborough
- 15 County Borough of Swansea
- 16 Borough of Torbay
- 17 Metropolitan Borough of Wolverhampton



NB: Numbers are for ease of identification only and have been allocated against local authorities in alphabetical order in each category. Numbers do not indicate a ranking.

Chapter 1: Panel appointment, our remit and criteria

Background

1. The Gambling Act 2005¹ (the 2005 Act) will allow three new types of casinos to operate in Britain. One regional casino will be permitted, along with eight large and eight small casinos. The 2005 Act requires the Secretary of State by Order to make provision for determining the geographical distribution of casino premises. In particular, the Secretary of State is to identify the particular licensing authorities which will be permitted to grant a casino premises licence (or licences).
2. The regional casino will have a minimum total customer area of 5,000 m², and be permitted up to 1,250 Category A unlimited jackpot gaming machines. Large casinos will have a minimum total customer area of 1,500 m², and be permitted up to 150 Category B gaming machines, with a maximum jackpot of £4,000. Small casinos will have a minimum total customer area of 750m², and be permitted up to 80 Category B gaming machines, with a maximum jackpot of £4,000. The one regional and eight large casinos will be permitted to offer bingo, and all three categories will be permitted to offer betting.²
3. The Government expects that a regional casino will be a major development, offering clear potential for regeneration. It will provide not just a range of gambling activities, but may include hotel accommodation, conference facilities, restaurants, bars, areas for live entertainment and other leisure attractions.
4. The Casino Advisory Panel was set up by the Secretary of State for Culture, Media and Sport to recommend to her the areas where the one regional casino and eight large and eight small casinos would best be located.

The Appointment of the Panel

5. We were appointed by Richard Caborn, Minister of State in DCMS, on 1 October 2005 after an open competition and interview by a board including two independent members.
6. The Panel was constituted as an independent advisory body which was not beholden to any local authority, casino developer or operator; nor was it subject to any political pressures or interference with its work. From the start we were assisted by a Secretariat which was staffed by DCMS and based in their offices, but which functioned entirely separately from DCMS and was under the direction of the Panel Chair.

¹ Section 175

² Section 174 of the 2005 Act

Membership of the Panel

7. The Members of the Panel were Professor Stephen Crow CB (Chair), Christopher Collison, James Froomberg, Neil Mundy and Deep Sagar. Between us we have a wealth of both private and public sector professional and practical knowledge, experience and expertise in a range of matters including planning, securing regeneration, economic impact, leisure and tourism, property development, and addressing social impacts. Our personal profiles are given at Annex A.

Members' interests

8. Every member of the Panel has been committed to the seven "Nolan" Principles of Public Life and was bound by a code of practice.³ We prepared, and issued on request, two registers; one recording each of our business, financial, academic and other interests; and the other registering declarations from each of us regarding those locations where the member in question had either an interest, or what could be perceived by others as an interest. We erred on the side of caution, and – in cases where there was any doubt – included the activity or location concerned on the relevant list.
9. We implemented throughout a policy to ensure that our private interests would not influence our decisions or decision-making processes. We distinguished between general interests which presented no conflict; perceived conflicts of interest, (i.e. interests that could be perceived by a reasonable member of the public as raising a conflict); and those interests which might have raised an actual conflict (eg, where a Panel member might have gained from a particular decision). Our policy applied both to our initial sifting process and to our later evaluation of shortlisted proposals. The former is described in paragraph 34. For the latter, in the case of an actual conflict, our policy was that the member with the interest would have been asked to leave the room at relevant points during discussions. In the case of a perceived conflict, the member concerned was expected to declare that interest. He would then be able to sit in on the discussion, but not contribute unless asked to by other members of the Panel, who would, in each case, determine the extent to which it was appropriate for the Panel member concerned to contribute. That depended on all the circumstances of the case, in particular the nature of the interest and the matter under discussion. Panel members' interests were publicly stated at the opening statement at the Examinations in Public for the regional casino proposals (see paragraph 49).

The Panel's criteria

10. In August 2005 DCMS issued us with *Terms of Reference* for assisting the Secretary of State in determining the geographical distribution of casino premises licences. The full text of our *Terms of Reference* is set out at Annex B. DCMS asked us to have due regard to the *Government's National Policy Statement on Casinos* published on 16 December 2004. The full text of that statement is given at Annex C. It must be noted, however, that that policy statement was issued while the Bill for what subsequently became the

³ See the Casino Advisory Panel website, *Guiding Principles, Code of Practice*: <http://www.culture.gov.uk/cap/guiding.htm#3>

- 2005 Act was before Parliament. The Bill at that stage proposed eight regional casinos, not, as was finally enacted, one.
11. The primary consideration set by DCMS was to ensure that locations provided the best possible test of social impact. Subject to that, the criteria were also:
 - to include areas in need of regeneration (as measured by employment and other social deprivation data) and which were likely to benefit in those terms from a new casino;
 - to ensure that those areas selected were willing to license a new casino.
 12. None of those criteria explicitly refer to the desirability of maximising beneficial social impact (for example in the decrease in unemployment) whilst minimising adverse social impact (for example in seeking to minimise problem gambling). We hold the view, however, that not only are these considerations implicit in providing the best possible test of social impact, but are also essential considerations regarding regeneration. Some indication as to the meaning of the best possible test of social impact is revealed by paragraph 5 of *Government's National Policy Statement on Casinos*⁴ which explains that in order to properly assess the impact of the new casinos, there needs to be a sufficient number in each category to allow the impacts to be assessed in a range of areas and types of location that might be suitable (including, for example, urban centres and seaside resorts across different parts of Britain).
 13. In the first instance the Secretary of State asked us to make our recommendations to her by the end of 2006, although we subsequently sought a short extension of that deadline to January 2007 to ensure the announcement was made while Parliament was sitting and to allow for printing of this final report. We agreed to make formal quarterly reports to the Secretary of State before sending her our final report.
 14. In November 2005 the Secretary of State agreed with the Panel a *Framework Document* which was intended to augment the *Terms of Reference*. It set out the key accountability relationships between the Panel and key players in DCMS and the timetable for the Panel's work. The full text of the *Framework Document* can be found at Annex D. In addition to the criteria set out in paragraph 11 above, in order to ensure that the impact of the new casinos could be assessed on the basis of a broad range of information and experience, we were asked also to identify areas for the new casinos which would provide:
 - a good range of types of areas; and,
 - a good geographical spread of areas across Britain.
 15. Under the *Framework Document*⁵ we were required to invite the Regional Planning Bodies in England to identify a list of broad locations for regional casinos emerging from their work on the Regional Spatial Strategies (RSS). Before we finalised our recommendation on the area for the one regional casino, if it was to be in England, we were tasked with ensuring that that area was compatible with the broad locations identified in the appropriate RSS or in any draft revision of RSS before the First Secretary of State.

⁴ Annex C
⁵ Section (ix)

Consultation, openness, transparency and the views of the public

16. We consulted widely from the beginning, seeking in particular the views of regional stakeholders in England, and their equivalents in Wales and Scotland. Where appropriate, we also sought the views of relevant local authority bodies.
17. We committed to operate in as clear and transparent a way as possible, which included publishing our source material, evidence submitted to us and our minutes on our website <http://www.culture.gov.uk/cap/>. We have issued press statements at particular milestones. In addition, although we were not bound technically by the Freedom of Information Act 2000, we committed ourselves to respond to requests for information within the spirit of that Act.
18. Throughout our processes, we have attempted to be thorough and fair to all concerned. In considering the proposals made by local authorities we have taken into account not only what they have told us, but also, so far as we were able to discern them, the views of local people and a range of representative organisations both nationally and in particular areas. In that context, we are very conscious of the strong feelings that many people have on the subject of gambling generally and about casino gambling in particular. We are certainly not unaware of the problems that gambling can bring to those who practise it to excess, and the difficulties faced by their unfortunate families and friends. The incidence of these often acute problems are well documented and, even if they were not, were well set out in the correspondence and other representations received from members of the public and concerned organisations. Nevertheless, at all times we have had to bear in mind what Parliament has decided. It was our task just to use the evidence in a way that would help us evaluate proposals against our criteria.

How many casinos?

19. In December 2004, before the completion of the passage through Parliament of the 2005 Act, the Government's policy was to allow licences for eight regional casinos across Britain.⁶ However when Parliament passed the Gambling Act in 2005, that figure was reduced to one regional casino.⁷
20. The change in the number of regional casinos that were to be permitted has caused some controversy and confusion as a backdrop to our work. There has been some pressure on Government to amend by Order the legislation to revert the number to eight regional casinos. We received a number of approaches from external interested parties who questioned the fundamental basis of what we had been asked to do. In particular, a misunderstanding arose in some quarters that, because in the first instance we shortlisted eight local authority areas for a regional casino (see paragraph 36 below), that those eight areas would eventually automatically be allowed to issue casino licences in line with the Government's original policy to license eight regional casinos. However, the Government's possible intentions for the future in respect of numbers of casinos that it will allow have played no part in our decisions as to the numbers to shortlist. The fact that we originally shortlisted eight areas for a regional casino was a coincidence – that

⁶ Government's *National Policy Statement on Casinos* 16 December 2004 Annex C

⁷ Section 175(1)

number could just have easily been nine, or (as it subsequently became when Brent Council notified us that they no longer wished to pursue their proposal⁸) seven, or some other number. Our objective had been simply through evaluation to reduce the competing proposals to those that deserved to go forward for further examination to a manageable number.

21. Further we have been clear from the start that our remit as set by the Secretary of State⁹ has been to advise her on locations only for one regional, eight large, and eight small, casinos, in line with the numbers allowed under the 2005 Act.¹⁰ Our remit did not extend to giving choices of location in the different casino categories, nor backup options, nor options for the future should Government policy on the number of regional casinos permitted ever change. Insofar as the issue of numbers has entered our discussions at all, it has been only to the extent to which the proposals for the one regional casino have been based on the assumption of a continuing monopoly for an unspecified time period for such an operation in Britain.

Relationship of our remit to licensing and the problem of contracts

22. Our clear remit¹¹ has been to recommend to the Secretary of State areas for the location of casinos; our recommendations were not to be site or operator specific. Under schedule 9 of the 2005 Act the process envisaged is that the Secretary of State will state in an Order which local authorities can issue casino premises licences. Once the Secretary of State has made her decision, it will then be for the local licensing authorities to award the casino premises licences to particular operators. Before considering any application for a licence, those local authorities must invite competing applications and comply with regulations to be laid by the Secretary of State regarding the procedures to be followed. Only at that stage will it be apparent precisely where within the successful local authorities the casinos will be built. The legislation provides no means by which the Secretary of State can require an authority to award the licence to a particular operator. Even if the Secretary of State decided to identify an authority whose proposal to us had been site specific, there could be no certainty that the authority would in turn grant the casino premises licence in accordance with its original proposal. Indeed, there may be good reasons why it could not.
23. Against all this, however, we found that in their proposals some local authorities had already identified specific towns, sites or even buildings, and had entered into contracts with operators with whom they wished to work. In some instances, we have found a degree of locational specificity helpful. So, in a widespread district containing a number of individual towns it has been helpful for an individual town to be cited as the location of a proposed casino. Or, in a large city containing many different sorts of area, it has been helpful for a particular area to be so cited. In other instances, however, proposals have related to individual sites or even to an individual building. Where the merits of a particular site have been put forward as a particular merit of a proposal, we have taken

⁸ Letter from Brent Council to the Casino Advisory Panel of 24 August 2006

⁹ Casino Advisory Panel *Framework Document* November 2005

¹⁰ Section 175

¹¹ Casino Advisory Panel *Terms of Reference*

the asserted merit into account, but did not necessarily do so favourably. Plainly, such considerations lead at least to the borders of relevance and in no instance have we felt justified in attaching much weight to them. We regarded it as fundamental that our decisions should not be based on the perceived site specific advantages of a particular potential applicant for a licence. In the event that we were to recommend to the Secretary of State an area involving a site specific proposal, it followed under the legislation that the local authority would still nevertheless need to comply with requirements for inviting competing applications as provided for by schedule 9 of the 2005 Act.¹²

24. While we quite understand that the apparent tying of local authorities to specific operators may be a matter of public concern, it has been no part of our duties to police the competition provisions of the 2005 Act, and this matter in itself has occupied no part of our consideration, either for or against a proposal.

Gaming duty

25. It became clear as we examined the proposals for a regional casino that at least some of the enthusiasm for it derived from anticipation of the community benefits that could be extracted through the working of Schedule 9 of the 2005 Act or otherwise. The availability of community benefits of this nature is of course related to the profitability of the regional casino after gaming duty.

Chapter 2: Panel procedures

Our Process

26. We invited local authorities to make proposals for the casinos to be permitted and then evaluated the proposals according to our remitted criteria. We proceeded on the basis that we would consult widely and seek out evidence, which we would appraise in the light of all our professional knowledge and experience, before coming to our decisions. We split our work into four phases:
- Phase 1 was a scoping phase, in which we gained an impression of the volume of work before us, background research was undertaken and submissions were invited from local authorities;
 - In Phase 2 we considered and sifted the submitted proposals against the basic policy criteria;
 - In Phase 3 we further examined the proposals we had selected for the shortlists;
 - Phase 4 was our decision and reporting phase.

We have made formal reports to the Secretary of State at the end of each of these phases, this published report constituting our final report.

¹² The Gambling Act 2005 section 175 and schedule 9

Process Phase 1: Scoping and invitation of proposals

27. Activities included in this phase which ran until January 2006 included a search of available DCMS material and informal expressions of interest already on file or in the media, plus a library search of research material on casinos and their community/regeneration effects. A report pulling such research material together was produced for us during this process and provided us with background information. That report is published on our website.
28. Early on we made a decision to invite proposals from local authorities but, being unaware of how many would in the event be interested, we circulated to all local authorities in November 2005 a non-committal request as to whether interest was to be expected. Some 131 local authorities responded to us. Of those, 52 authorities said that they were not interested and four said that they could not give an indication at that time. There were 75 expressions of interest in total covering the three types of casino.
29. In preparation for the invitation of proposals from local authorities, we developed the criteria set out in our *Terms of Reference*¹³ into a list of the information we would need in order to consider the local authority proposals on a fair and equal basis. We also consulted with Regional Planning Bodies and Development Agencies, Regional Assemblies (including the Mayor of London), the Scottish Executive, the National Assembly for Wales, and Scottish Enterprise, both for initial views on the whole process and then for specific input into the draft documentation to accompany the call for proposals, including our Key Lines of Enquiry (KLOE) headings.¹⁴ The Local Authorities Coordinating Office on Regulatory Services (LACORS), the Local Government Association, DCMS and the then Office of the Deputy Prime Minister were similarly asked to contribute their views. We additionally took legal advice from the Treasury Solicitor who commented on the process as a whole and on the specific documentation to date.
30. On 31 January 2006 we invited proposals from local authorities who are licensing authorities (as defined in section 2 of the 2005 Act) in England and Wales, and in Scotland, licensing boards. A copy of the formal *Call for Proposals* document which we developed is given at Annex E. We set out the remitted criteria in the *Call for Proposals* and we asked authorities making proposals to submit information under KLOE headings. The KLOE were all relevant to the remitted criteria and were compiled as a means of enabling us to apply the remitted criteria to our considerations. In particular, we were concerned:
- to ensure that we received the information necessary to consider the extent to which proposals met the remitted criteria;
 - to provide authorities with a clear indication of the evidence which we were expecting to receive in order to apply the remitted criteria; and
 - to ensure that proposals were submitted on a like basis, so that comparisons could fairly be made.

¹³ Annex B

¹⁴ Representations from regional bodies can be found on the CAP website under the Examinations in Public Section

The KLOE were:

- Type of area
- Social Impact
- Need for regeneration
- Willingness to license
- Probability of implementation
- Regional and Local Context
- Community benefits
- Unique characteristics

31. As part of the *Call for Proposals* document we published detailed guidance setting out the criteria we were using and the information we required in order to assist our decision making. That guidance was intended to enable local authorities to provide material for us that was both concise and relevant and which ensured that we received comparable information for all areas. We asked local authorities to submit proposals that were no longer than 20 pages in length excluding the cover page. Reference could be made to published material, but sources of published information and statistical data were to be clearly referenced and additional appendices were not invited. Local authorities were asked to state clearly whether their proposal was for a regional, or a large or small casino, or a mixture and whether they wanted a fallback if their first choice was not offered. We made clear that all submitted material would be in the public domain, and therefore evidence of a confidential nature would not be accepted. We asked local authorities to submit proposals by 31 March 2006, thereby allowing two months for submissions to be prepared. We thought that period sufficient bearing in mind both our overall programme, and our expectation that much work and consideration would already have been given to serious proposals.
32. On 31 January 2006 our Chair submitted his first report to the Secretary of State setting out the details of completion of phase 1 of our work.¹⁵

Process Phase 2: Submission of proposals, sifting and shortlisting

Submission of proposals

33. A total of 68 proposals were initially submitted to us and a list of those – with an indication of any that were subsequently withdrawn – is at Annex F.¹⁶ Some local authorities had made a proposal for just a regional, just a large, or just a small casino. Others went for a mixture or in many cases gave a fall back position eg. for a large casino if their proposal for a regional casino was unsuccessful. Those proposals then needed to be considered carefully and sifted and thinned down to manageable numbers to go forward for further examination.

¹⁵ All reports by the Chair of the Casino Advisory Panel to the Secretary of State are included on the Panel's website

¹⁶ All proposals initially submitted, except the one from Woking Council who withdrew from the competition almost immediately, are included on the CAP website

Initial sifting and shortlisting

34. For the sifting stage, for practical reasons we divided into “buddy” pairs who produced an initial score for individual proposals which were then moderated by a third Panel member where necessary, and then evaluated based on reasoned discussion by the whole Panel.¹⁷ We ensured that the pairs did not include anyone with any interest in the proposals allocated to them during this part of the process. In coming up with rankings it is important to note that we did not do so with the intention of establishing rankings for their own purpose, but rather to ensure that we would identify for further attention all proposals that had the potential of being winners. In the discussions which took place following the scoring of individual proposals, we specifically considered the fact that “test of social impact” was the primary remitted criteria, and took that into account in reaching our decision as to the provisional shortlists. The document at Annex G sets out our sifting process in more detail.
35. The output from that sifting exercise was provisional shortlists for further examination of eight competing proposals for the regional casino and 31 for large and small casinos.
36. On 17 May 2006 the Chair of the Panel made his second report to the Secretary of State setting out for her our shortlisting decisions and our plans for the next stage of the process. That we told her our shortlisting decisions in advance of their general publication was as a courtesy only. On 24 May 2006 we published the following provisional shortlists of successful proposals which would be taken forward for further evaluation:
- Regional:** Blackpool; Brent;¹⁸ Cardiff; Glasgow; Greenwich; Manchester; Newcastle; Sheffield.
- Large and Small:** Bath & North East Somerset; Bournemouth; Brighton; Canterbury;¹⁹ Chelmsford; Dartford;²⁰ Dudley; Dumfries and Galloway; East Lindsey; Great Yarmouth; Hastings; Kingston upon Hull; Leeds; Leicester; Luton; Mansfield; Middlesbrough; Milton Keynes; Newham; North East Lincolnshire; Peterborough; Restormel; Scarborough; Sefton; Solihull; Southampton; South Tyneside; Swansea; Thurrock;²¹ Torbay; Wolverhampton.
37. For those individual proposals not selected for further examination, we published on our website a short statement giving the reasons why. We knew that our decisions would cause disappointment to some, not least to authorities who had looked to their casino proposal as a means of alleviating severe problems of deprivation, or even improving social conditions and meeting the need for economic regeneration. But the competition had been very strong, and so it was inevitable that some proposals, good though they might have been in themselves, had had to yield before more powerfully justified cases.

¹⁷ The scorings are given under the What's New entry for 24 July 2006 on the CAP website

¹⁸ On 24 August 2006 Brent Council notified the Panel that it no longer wished to pursue its proposal

¹⁹ In September 2006 Canterbury City Council notified the Panel before the final stage of the evaluation process that they wished to withdraw from the competition

²⁰ In August 2006 Dartford Borough Council notified the Panel before the final stage of the evaluation process that they wished to withdraw from the competition

²¹ In September 2006 Thurrock Borough Council notified the Panel before the final stage of the evaluation process that they wished to withdraw from the competition

Process Phase 3 – Finalisation of the shortlists, further examination and testing of proposals

Consultation period

38. The *Government's National Policy Statement on Casinos*²² committed us to consulting Regional Planning Bodies in England. On 24 May 2006, as well as announcing the provisional shortlists, we also announced a period of consultation on those shortlists before they were to be finalised.²³ We gave Regional Planning Bodies and Regional Development Agencies, and comparable bodies in Wales and Scotland, the opportunity to pass to us any further views. We also gave members of the public and any representative organisations the opportunity to express their opinions, whether of opposition or support, on the proposals. We reminded the public that national policy about casinos had already been decided by Parliament; what we were seeking were people's views on the proposed areas for casinos. The deadline for all representations to be submitted was 28 June 2006.

Additional period for submission of information by proposing local authorities

39. Not long after this it became clear to us that our provisional shortlisting of proposals, consulting regional stakeholders, and calling for representations from the public, appeared to have led in some quarters to two unfortunate misunderstandings.²⁴ The first misunderstanding was that we had set up some sort of process of appeal against our shortlisting decisions. That was not so. However, we did notify any local authority who asked that if any substantial new evidence from consultees or others were to be brought to our attention that would justify the reconsideration of our decisions, then we would feel it only right to consider it in that light. Some local authorities did contact us and subsequently in June 2006 made a further submission to us as a result.
40. The second misunderstanding was that the proposals that had been unsuccessful in the shortlisting process had been unsuccessful because of some intrinsic problem or shortcoming. Again that was not so. As we had made clear at the time of publication of our decisions²⁵, the proposals had not been considered on their own merits in isolation of the others but as part of a competition. So the reason for lack of success in every case was that, quite simply, whatever the unsuccessful proposals appeared to us to offer, others had more to offer in terms of the criteria.
41. On 24 July 2006 we issued a press release²⁶ saying that, in light of the additional representations which we had received since 24 May 2006, it was clear that there had been some confusion as to whether the further consultation period announced on 24 May 2006 had been intended to give local authorities who were not included on the

²² Paragraph 10 Annex C

²³ CAP Press Notice 24 May 2006. We also emailed regional bodies individually

²⁴ Our understanding was gained predominately from telephone calls we received

²⁵ CAP Press Notice and letters to local authorities of 24 May 2006 – see CAP website

²⁶ See CAP website

shortlists an opportunity to make further submissions. While a number of authorities who had contacted us proactively had been allowed to make further representations, we were concerned that not all authorities may have been aware that the limited opportunity to do so existed.

42. Having regard to that, and having taken into account the wider public interest and the need to ensure there was fairness for all authorities, we announced an additional period within which further submissions might be made by local authorities.²⁷ Any local authority that had previously submitted a proposal in any of the regional, large and small categories would be able to make further submissions to us subject to certain detailed requirements. In particular we would only consider information and material that was compelling and new and that could not have been submitted with the original proposal. The deadline we gave local authorities for further submissions was 14 August 2006.
43. We made clear that the shortlists announced on 24 May 2006 had been confirmed and that the further period for submissions would not affect the position of those already on the shortlists. Rather, it was an opportunity for non short-listed local authorities to submit further information. We were, however, prepared to extend the shortlists if, taken together with the existing information previously submitted, a local authority produced information that we considered justified its inclusion on the relevant shortlist. It followed that, while they were welcome to do so, there was no necessity for authorities that had already been shortlisted to submit additional information.
44. In order to assist local authorities in identifying the areas on which they might wish to concentrate in making further representations, we drew their attention to information we had posted on our website including the explanation of the first sifting process, plus the moderated score sheet for each local authority proposal and the rankings and our comments on each proposal.²⁸ In view of the process by which the scores had been derived, we did not consider that it was practicable or necessary to provide any further information regarding individual proposals.

Finalisation of the shortlists

45. We received a total of 30 further submissions²⁹ by the due date from local authorities who had previously submitted proposals. Of those 15 were from authorities who were either not on a shortlist but were seeking to be added to one, or who were seeking to be transferred from the large and small shortlist to the regional shortlist. The remaining 15 submissions took the form of additional information provided by local authorities who had already been shortlisted in their chosen category.
46. In respect of the 15 local authorities that were seeking to change their shortlisting position, during August and September 2006 we considered the further information they had submitted alongside their original proposal and any other properly submitted documentation. In doing so, we had regard to the specific criteria that we had laid down for the submission of further information, and in particular that any information that we

²⁷ CAP Press Notice and individual letters to local authorities of 24 July 2006

²⁸ All on the CAP website

²⁹ See our submitted documents list – Annex H and CAP website

would take into account must be new, compelling, and not reasonably available at the time of submission of the original proposal.

47. On 13 October 2006 we published our finalised shortlist. We made no change to the regional shortlist, save that we removed Brent following their notification to us that they no longer wished to pursue their proposal.³⁰ In total, therefore seven local authorities were finally shortlisted for the regional casino. We decided to add Chesterfield to the large and small shortlist. In addition, Canterbury, Dartford and Thurrock who had all withdrawn from the competition since publication of the provisional shortlist on 24 May 2006, had been removed. In total, therefore, 29 authorities were shortlisted for the large and small casinos. The finalised shortlists therefore read as follows:

Regional: Blackpool; Cardiff; Glasgow; Greenwich; Manchester; Newcastle; Sheffield.

Large and Small: Bath & North East Somerset; Bournemouth; Brighton; Chelmsford; Chesterfield; Dudley; Dumfries and Galloway; East Lindsey; Great Yarmouth; Hastings; Kingston upon Hull; Leeds; Leicester; Luton; Mansfield; Middlesbrough; Milton Keynes; Newham; North East Lincolnshire; Peterborough; Restormel; Scarborough; Sefton; Solihull; Southampton; South Tyneside; Swansea; Torbay; Wolverhampton.

Regional shortlist: further examination

48. Concurrent to the activity described above to seek further information on the basis of which to finalise the shortlists, we had also been progressing further examination of those proposals which had already been shortlisted. On 19 July 2006 we issued sets of further proposal-specific questions to those local authorities that had been shortlisted for a regional casino, the answers to which they were asked to submit by 14 August 2006.³¹ The questions were linked closely to the KLOE that had framed the original questionnaire that we had sent to all local authorities back in January 2006.³² The answers provided useful additional evidence for us to consider as part of our further examination of those proposals. We also asked regional shortlistees to submit a 1,500 word statement by 10 August 2006. That was to set out their best case summary of their proposal which would form the basis of their opening statement at an oral day long Examination in Public (EiP). We also made a tour of each area during phase 3 of our process to give ourselves a general feel for the area and the issues raised in respect of each proposal.

Examination in Public of shortlisted proposals for a regional casino

49. In addition to the seeking of further information in writing, we tested the strength of selected competing proposals for a regional casino through the medium of public “round table” conferences based on the EiP method used in the town planning field for the testing of regional spatial strategy. We issued guidance to all the shortlisted areas for a regional casino explaining the EiP process.³³

³⁰ Letter from the London Borough of Brent to the Casino Advisory Panel 24 August 2006

³¹ The questions, plus the answers that the councils gave us, are under the individual council headings in the Examinations in Public Section of the CAP website

³² See *Call for Proposals* document Annex E

³³ See CAP website *What's New Archive* 3 August 2006 *Guidance Notes for Participants in the Examination in Public of certain proposals for a Regional Casino* (Revised 2nd August 2006)

50. The main purpose of the EiP of a proposal for a regional casino was to provide an opportunity for the discussion and testing, in public and before us, of selected matters. We selected those matters following our consideration of all the evidence before us (that is, the proposals, the representations made, and the responses from the shortlisted local authorities to our proposal-specific questions³⁴) and what we considered we needed to hear about in order to select the area to be recommended to the Secretary of State. The matters to be discussed at the EiP were related to our remitted criteria, and their application to the proposal being considered.
51. In each case we gave the proposing local authorities a little notice of the matters that we had selected that we wished to pursue at the EiP and around which our questions were likely to be framed (see Annex I). The selected matters were also published and forwarded to all others invited to take part in the EiP. That procedure ensured that proposing authorities and other participants had the opportunity of considering in advance the matters we had selected for further discussion or examination at the EiP. Nevertheless, taking into account the nature of the task before us and the fact that other participants might, at the EiP, raise additional matters that were considered to be relevant, we told all shortlisted local authorities in advance that we expected them to be fully prepared to answer any questions at the EiP and to respond to any points made about their proposals generally but, in particular, with respect to any of the KLOE.
52. As the EiP were directed to the discussion of selected matters, and not to the hearing of all representations, individuals did not have an automatic right to appear. Participants had to be invited. We invited to the EiP representatives of the authority making the proposal; the appropriate regional bodies or appropriate bodies in Scotland and Wales; people and organisations selected from those making representations; and others with special expertise on the subject in order to contribute to an understanding of the strategic issues. Any person wishing to take part in an EiP (other than the local authority whose proposal was its subject) was invited to provide us with a written statement setting out their reasons why they should be invited to participate.³⁵ Participating local authorities were also invited to propose participants.
53. The main criterion for selecting participants was the significance of the contribution they could be expected to make to the discussion, having regard to their knowledge and expertise and/or the views they had already expressed. We were careful to ensure that we did not invite so many participants as to preclude meaningful debate and aimed to select participants who between them represented a broad range of viewpoints and had a relevant contribution to make, thereby enabling an equitable balance of differing viewpoints to be achieved in the discussion of the proposal before us. We had no power to require attendance by any person at the EiP, and indeed some invitees did either decline the invitation or not turn up on the day. Lead participants were able to draw on the expertise of other representatives attending on behalf of the body they represented.

³⁴ All on the CAP website

³⁵ Letters from those invited to participate are included in the Examinations in Public section on the CAP website

54. We conducted the EiP at the end of August and the beginning of September 2006 into the seven regional casino shortlistees in or near the shortlisted areas. The schedule for those EiP, including names of participants, is at annex J.³⁶ In our Chair's opening statement, reference was made to the views of MPs who had written to us. He also made reference then to any relevant interests of Panel members. Limited press and public places were also made available at each EiP to allow observation of the proceedings. Indeed, the first EiP, for Greenwich though held in central London, attracted a degree of media attention.
55. Each EiP was chaired by the Chair of the Panel and all other Panel members also made up the EiP Panel at each EiP. The EiP were intended to allow for debate of the issues rather than the reading out of prepared position statements, and we encouraged discussion on the key points of contention in relation to each issue. In exploring those points we often needed to go beyond submitted material and lead the debate. In conducting the discussion, we ensured there had been sufficient discussion of the selected topics and sufficient information obtained so that properly informed recommendations could be made about them. Participants were asked to make every effort not to introduce new material during the EiP. We have nevertheless accepted some such material raised at the EiP on the basis that it would be circulated to all EiP participants to allow their comment afterwards.³⁷
56. In summary, these round table discussions with invited interested parties, open to the media and the public, gave us the opportunity to discuss relevant issues with a wide range of local organisations and individuals in favour of – and in opposition to – the proposal for a regional casino in each shortlisted area. We felt that the EiP were a useful exercise, in that they provided useful additional evidence for us to consider as part of our deliberations.

Large and Small shortlistees: further examination

57. We decided that further examination of the shortlisted proposals for large and small casinos should be by a paper based process. In September 2006 we issued to the shortlistees additional proposal-specific questions for which we asked for responses by 29 September 2006.³⁸ In respect of Chesterfield, who had been added to the shortlist later (see paragraph 47 above), we issued questions later and gave the authority a corresponding time in which to reply. During the period of the Panel's existence, at least one of us visited each of the areas shortlisted for a large or small casino.
58. In considering fallback proposals for large or small casinos we assessed the evidence according to the key criteria and KLOE as though the councils had submitted a proposal for a large or small casino in the first instance. Then, having established the large and small shortlist, we wrote to all such councils with case specific questions related to how well each proposal would address the key criteria through the development of a large or small casino. All, including those who originally applied for the regional casino, responded on the basis of what a large or small casino would offer the area concerned. None of the seven shortlisted areas for the regional casino had a fallback position for a large or a small casino.

³⁶ Actual participants on the day differed in some cases from those whom the Panel had invited. A list of invitees for each local authority is given on the CAP website

³⁷ All such information is included on the CAP website for each local authority under Post EiP Information Received

³⁸ Our questions, and the responses by local authorities, are given on the CAP website under the What's New entry for 27 October 2006

Completion of phase 3

59. On 10 October 2006 the Chair of the Panel made his third report to the Secretary of State setting out the details of completion of phase 3 of our work.³⁹ As we had discovered that it was required of us that our final report be printed for wider distribution at the same time as our submission of it to the Secretary of State, and to ensure that our recommendations were announced while Parliament was sitting, we sought a short extension of the deadline. The Secretary of State agreed to our request to extend the deadline for submission of our report to 30 January 2007.

Process Phase 4 – Decision and reporting

60. Phase four involved the consideration of all the evidence that had properly been submitted to us and the writing of our report to the Secretary of State. In the period since our original sifting process to produce the shortlists we asked a good number of questions and received a substantial amount of additional information. Some of the questions we asked and no doubt much of the new information submitted was to help us to resolve doubts that we might have about otherwise good proposals. So the result of our considering all this additional information sometimes led us to revise our earlier opinions of the proposals.
61. We tested each proposal against the remitted criteria, employing the same evaluation process for both regional and large and small casinos, with the exception that for appraisal of the regional proposals we also had the evidence we had collected at the EiP. Each of us reviewed all of the evidence about the proposals before coming together to discuss our final collective Panel conclusions. A more detailed note of our final evaluation process is given at Annex K.
62. On reaching our conclusion on the area for the regional casino, we needed to ensure that our recommendation was compatible with the broad locations identified in England in RSS or in any draft revisions of such documents before the Secretary of State.⁴⁰ We have satisfied ourselves of that, both in considering the submissions from regional assemblies and in taking oral evidence at the EiP sessions. We were also satisfied that the taking of both written submissions and oral evidence of other regional bodies fulfilled our duty to consult them before making our final decision.
63. This report of the Panel is our final report to the Secretary of State, and we present it to her a year after we first sent out our Call for Proposal document to all local authorities. What follows in Parts 2, 3 and 4 of this report is the results of our considerations during our determination process so far described in Part 1.

³⁹ See CAP website

⁴⁰ Framework Document Annex D part IX



Part 2: General considerations (lessons learned)

Chapter 3: Best possible test of social impact

64. In our remitted criteria, the primary consideration is to ensure that the locations selected provide the “best possible test of social impact”.
65. We think that the question of the best possible test of social impact may be looked at in two ways:
- That each location selected provides the best or, if not the best possible, a good test;
 - That the locations selected together provide the best possible test.
66. The latter approach, in our view, is closer to our remitted criterion to provide a good range of types of areas and a good geographical spread of areas across Britain which, as can be seen from the *National Policy Statement on Casinos*,⁴¹ was included “in order properly to assess the impact of these new casinos”.
67. There is, however, a peculiar problem in that a good range of types of areas and a good geographical spread of areas across Britain cannot be had with the one regional casino to be permitted, and so here we examined the extent to which each proposal would provide a good test. In considering the large and small proposals also we examined whether they would present a good test so that, in the aggregate, the whole selection would present the best test.
68. In offering a good range of types of areas and a good geographical spread of areas across Britain we have included all three categories of casino in the recommended selection.

What would be a good test?

69. What sort of location or pattern of locations might provide a good test? It might be thought that the results of developing a casino in an area would be obvious to all. Perhaps it might be, but we doubt it. It is just as likely that social changes manifested following a casino’s development would merely give rise to polarised argument on a sterile *post hoc, ergo propter hoc*⁴² basis.
70. So, in order better to evaluate the best test criterion, we have attempted to imagine, in the broadest of terms, what sort of research programme might be necessary in order to effect the best test. Without going too far into matters that are not our concern, we make the assumption that the researcher would begin with a baseline survey of social conditions in the test area. For this reason we have considered evidence from local authorities as to what they might have to offer in this regard.

⁴¹ Annex C, paragraphs 5 and 6. Paragraph 6 reads: “Once an assessment has been made of the impact on problem gambling of the limited number of new casinos, it will be easier to judge the continuing need for a limit. No earlier than three years after the award of the first premises licence, the Government will ask the Gambling Commission to advise on whether the introduction of the new types of casinos has led to an increase in problem gambling or is increasing that risk. We believe such a period is necessary to ensure a full assessment can be made of the impact of the new casinos. If the Government, on the basis of the Gambling Commission’s advice, decides to propose that more casinos may be licensed then the Order providing for this will need to be approved by Parliament. We will also want to assess, with the help of regional bodies, what the regeneration and other economic outcomes have been”

⁴² This has happened after (the development of the casino), therefore (the casino) is the cause of it

71. In considering the merits of a proposal for a regional casino in terms of presenting the best possible test of social impact we looked for:
- locations which exhibited particular demographic and social characteristics, for example being close to the national average of these characteristics;
 - locations in which the local authority had surveyed and developed a good series of local demographic and social data, and where we could have confidence in the ability to track relevant measures in due course;
 - locations in which it would be relatively easy for a researcher to identify and isolate social changes caused by the development of a casino from similar changes resulting from other causes.

72. Each of these considerations will now be examined in turn.

Particular demographic and social characteristics

73. That a given area exhibits demographic and social characteristics that are close to the national average is a good argument. While social science recognises well tried ways of standardising or normalising data we hold the view that closer correspondence with the average is advantageous, because it permits extrapolation.

74. Among the demographic variables we pay attention to the proportion of people of ethnic minority origin in the local population because this is the variable which exhibits the greatest difference from one major urban settlement to another. Other variables, such as age structure, are not so varied.

Local demographic and social data

75. Undoubtedly, readily available baseline data would make the work of a researcher easier, provided, of course, that they were the data that were needed for the research. Nevertheless, our view is that, if baseline data were not readily available, then it would just have to be collected. It would be a matter of time and expense, so we find some, but not determinative, weight to this consideration.

Ease of identification of social changes

76. We see the identification and isolation of social changes as being not only crucial to subsequent research but possibly also the most difficult to achieve. In general, any test of an exogenous change conducted among a welter of changing circumstances is unlikely to be conclusive, whereas one conducted in an area of little or no change is more likely to be successful.

77. On this basis, intuition suggests that research on social impact in a small town, particularly one where not a lot of other changes are happening, is more likely to yield good results than one conducted in a busy metropolis where any number of conflicting circumstances could muddy the clear picture,⁴³ including the presence of casinos and other gambling opportunities.
78. Against this intuition is the fact that a casino, particularly a regional casino, could be successful in a small area only through its attracting custom from a wide catchment zone. It would therefore make it difficult if not impossible to trace the effects among its diaspora of customers except on the basis of a sample survey which, with difficulty, attempted to trace the fortunes of selected former customers. So it would be relatively easy to study the local effects but less so the whole picture.

Lessons from present casinos

79. Although generally of a much smaller size, the present casino industry does offer numerous and wide-ranging lessons for those proposing new casinos. In respect of existing casinos, we received evidence about training, regulation and crime effects. But although we asked in appropriate cases for evidence to do with actual employment, revenue, profitability and social impact (say, to do with problem gambling) and any possible effects of potential new competition, the evidence was scanty. The areas in which casinos are already permitted are listed at Annex L.

Likelihood and timeliness of implementation

80. A proposal that is not likely to be implemented is plainly not going to present a good test. Moreover, given that the remit of the Gambling Commission is to advise on social impact of the new casinos "no earlier than three years after the award of the first premises licence",⁴⁴ a proposal that is not likely to be developed and functioning in the next few years would not present a good test either. Similarly a proposal that is developed, but is either of reduced scale or performs sub-optimally, because of poorer catchment or other market factors, would reduce the ability to test the full potential impact of such a casino.

The test and individual proposals

81. After considering all the evidence, no single regional proposal emerged as the self evident favourite in presenting the best test of social impact. All had one or another point in its favour. This consideration led us to confirm that the way forward lay in looking at the whole range of proposals, as well as individual proposals.

⁴³ An ingenious particularising of this argument has been presented by Professor Sir Peter Hall on behalf of Blackpool (Paper "Test of Social Impact" submitted following the close of the EiP and placed on the Panel's website). This paper suggests that a location should be chosen that both has acute regeneration needs, but also has little endogenous impetus toward regeneration

⁴⁴ National Policy Statement on Casinos (Annex C), paragraph 6

The test and the whole selection

82. Under this head we considered locations as being typical of particular types of locality, viz:
- inner city
 - city conurbation
 - city region town/market town
 - town formerly dominated by single industry
 - seaside resort
 - inland tourism oriented area
 - port
 - heritage setting
 - growth zone town

as well as spatial/geographical spread. This approach to our mind offers greatest promise in that it would, for example, enable research to suggest distinction in social impact between one sort of location and another.

Chapter 4: Social considerations

What is regeneration?

83. None of our remitted criteria explicitly require us to consider social impact *per se*. However, “need for regeneration” is defined for us in our terms of reference as being “measured by employment and other social deprivation data”. It is clear to us from this that among the many ways that the term “regeneration” may be defined, it must be holistic, to include not only physical and environmental regeneration, best expressed by the older term “redevelopment”, but also a wide spectrum of social, and economic considerations.
84. Moreover, we note that the 2005 Act sets out “licensing objectives” related to preventing crime and disorder and the protection of children and young persons from harm. Not only are these considerations implicit therefore in providing the best possible test of social impact, but are also essential considerations regarding regeneration as we see it.

Multiple Deprivation

85. We were asked to include areas in need of economic development and regeneration (as measured by employment and other social deprivation factors). Exact comparison between local authorities in Scotland, Wales and England is not altogether possible due to inter-national differences in data used. In particular, whilst the 2004 indices for England include domains for crime and physical environment, those for Scotland and Wales did not,⁴⁵ although the revised 2005 indices for Wales included an environmental domain.⁴⁶

⁴⁵ www.communities.gov.uk/odpm/SOA/LASummaries2004.xls, also www.lgdu-wales.gov.uk/Documents/Project/Deprivation/WDE02000_041000_UK_Deprivation_Domains_Indicators_eng.pdf, downloaded 24/10/2006

⁴⁶ <http://www.lgdu-wales.gov.uk/pi/WimdProject.asp?id=1762>

86. The Panel is mindful also that indices for whole local areas do not necessarily illustrate either the situation in the whole conurbation in which the area lies, or, sometimes of greater importance, local areas of acute deprivation within the local authority area concerned. Attention is drawn to local concentrations of deprivation in this report where appropriate.

Employment

87. Fortunately, there is a standard set of employment data for the whole of Britain which is published by the Office of National Statistics. This is the set of official labour market statistics available online under the heading *NOMIS*. This set is used throughout the appraisals in the following chapters. Of the many data sets available, we have chosen three as best representative in the generality: the proportion of economically active in the population of working age, the proportion thereof who were in employment, and latest figures for claimant unemployed. Other figures are given where we consider them appropriate to a particular case.

Ambient and impulse gambling

88. Throughout our consideration of the submitted evidence we noted concern that the location of a casino in or near an area of social deprivation could locally worsen problem gambling and debt. For example, people in financial trouble might see the prospect of an unlimited jackpot as a “quick fix” to their problems. Such concern is supported, for example, in Sir Alan Budd’s Report by a reference in the British Prevalence Survey associating the highest percentages of problem gambling with table games in a casino, betting and fruit machines,⁴⁷ and we note also evidence as to a correlation between proximity and problem gambling related to casinos.⁴⁸ Our remit, however, is to look at areas rather than sites and we have very much focussed on that. Moreover, town planning policy throughout Britain regards casinos as a town centre use.⁴⁹ So our view is that problem gambling is more a town planning consideration rather than one for us, though we have noted in our appraisals where it is proposed to locate a casino near to an area of deprivation. In the event, this consideration has in no case been determinative.

Crime

89. The association in the minds of many between casinos and crime led us to examine whether, in the areas of the proposals before us, there were any special local considerations that we should pay attention to. We were pleased that at each session of EiP the local police were well represented, but their evidence in every instance was that they expected no special problems; indeed, in the areas of organised crime, prostitution, and money laundering they all indicated that through research and intelligence gathering, they could keep on top of potential problems in collaboration with the

⁴⁷ Gambling Review Body (2001) *Gambling Review Report*, London, DCMS CM5206, paragraph 17.58

⁴⁸ Gerda Reith with the Scottish Centre for Social Research (2006) *Research on the Social Impacts of Gambling*, Edinburgh, Scottish Executive, paragraph 4.41. (Most research of course does not seem to have included the effect of internet gambling which has to be watched for the future)

⁴⁹ In England, *ODPM Planning Policy Statement No.6 (PPS6)*, paragraph 1.8, In Scotland, *draft Scottish Planning Policy* chapter 8, paragraph 4 and in Wales. *Planning Policy Wales*, Chapter 8

licensing authorities. Mention was made of possible problems of crowd related crime, and crime by problem gamblers, but there was no suggestion of any particular local problems. We have not, therefore covered this ground again in the appraisals of individual proposals that follow.

Chapter 5: Some questions of regeneration

Government Policy

90. The Government takes the view that regional and large casinos have the potential to bring in major investment and economic regeneration to the areas where they are located.⁵⁰ Of a regional casino, the Government expects that it will be a major development, offering clear potential for regeneration. It will provide not just a range of gambling activities, but may include hotel accommodation, conference facilities, restaurants, bars, areas for live entertainment and other leisure attractions.⁵¹
91. Of course this is not to say that wherever a major casino is located, uniformly beneficial results would accrue. Overseas evidence⁵² suggests that one casino of the size proposed in Britain in isolation may not always bring about regeneration. What may be needed is the development of a mutually supporting complex of casino or casinos, including hotels and other complementary facilities such as conference facilities and large-scale entertainment and retail opportunities, ideally developed under the auspices of a commercially viable tourism development strategy and in recognition of the market viability of such a scale of development.
92. The “gold standard” for a regional casino, as we see it, is a regeneration that would not only provide jobs and demand for local services in the casino itself, not only have developed with it a good quality hotel or hotels, not only add to these facilities a desired local project such as large-scale entertainment and retail opportunities or an international standard conference facility, but set in train spontaneous growth that would continually revitalise the local economy.
93. The scale of such a development will in part be dependent on the limitations placed by the 2005 Act on the permitted amount of profitable gaming activity and in part on the market viability of all the other facilities. The key is to develop strategies that are economically viable and capable of sustaining economic growth.

Demand and Economic Modelling

94. As we were given a substantial amount of evidence in the form of a variety of economic modelling undertaken by different firms of consultants for different proposing local authorities and also commentary on the models involved we considered what weight

⁵⁰ Framework Document, paragraph 1

⁵¹ Statement of National Policy, paragraph 3

⁵² From Detroit, New Orleans and Dortmund

should be attached to the results of these models. In general, we see no good reason to dispute the workings of the different models used, especially where they have been subject to peer review.⁵³ But as with all models in this field, so much depends upon the data used and the assumptions made. Critical among these assumptions are:

- the scale of the development proposed;
- increase in casino participation;
- the number of visitors to be attracted;
- the displacement effects of the proposed development, that is the extent to which the proposal would absorb pre-existing economic activity;
- the “multiplier” effect, that is the extent to which the additional direct income in the economy would result in further expenditure and job creation in the same economy; and,
- the “leakage” of jobs created, that is the proportion of jobs that would be taken by people outside the area concerned.

95. In general, most of the proposals submitted showed a tendency to concentrate on supply-side models when looking at regeneration benefits. Demand-side models using simple techniques to forecast demand (eg. surveying possible customers) were not used. While most authorities and their advisors had studied overseas examples of casinos of comparable size, particularly as to consideration of direct employment within the casino itself, we found them concentrating on assuming that similar levels of employment would apply and assuming that, since they were profitable, British ones must be as well. So of necessity we used our own expertise and judgement to assess likely comparative employment and other regeneration benefits.
96. Although we had much evidence and counter evidence presented, in no case did we find sufficient evidence as to the assumptions used that would convince us that the workings of any model could be relied on totally. More, we saw them being of use as broad-brush indicators. Here we note the evidence of an academic expert⁵⁴ in the field that the selected assumptions of such models can never be proved because they use past data to predict future conditions.
97. Indeed, on the use and misuse of this sort of impact study, we can do no better than quote the author of the Pion reports which have been used in the strategic planning of the North West of England and in support of a proposal for a regional casino:⁵⁵
98. *“... in terms of forecasting, I think we are in a terribly difficult situation here, in the sense that we are facing what could be a very complex structural change in the nature of the industry. I think, therefore, that concentrating on previous transient patterns is useful but may not actually give us too much in the way of information because of the nature of the change that is about to take place. In our report, quite clearly, we have looked at some of the evidence from other jurisdictions which has formed part of the process and we have taken quite seriously the perspectives and the investment intentions of*

⁵³ For example, the Pion Model has been reviewed by Professor Leighton Vaughan Williams in *The Consequences of Gambling Deregulation in the UK: A Critical Review of Some Theory and Evidence*, Joint Committee on the Draft Gambling Bill, First Report Volume III, Ev 739-740

⁵⁴ Professor John Lovering at the EIP in Cardiff

⁵⁵ Mr Twomey in evidence to the Joint Bill Committee (Q305, 13 January 2004)

members of the group, because at the end of the day, I think, these are the people who are standing by, willing, ready and able to make concrete investment decisions based on strict and sound commercial principles. If the Committee is looking for a way of forecasting the future, I would advise the Committee to stop at that point. It is a complex issue and a range of considerations come to form the perspective of the future".

Job creation

99. All of the proposals for regional casinos before us asserted estimates of job creation. All were different. We tried hard to come to a sensible conclusion about these estimates, through attempting to isolate the jobs likely in the proposed casino itself from those expected in associated hotels and other facilities. One problem encountered was estimating the size of casino that would emerge from the interaction of market forces with the licensing process. Plainly, it is in nobody's interest to do other than think big at this stage. Much of the evidence given as to number of jobs related to casinos in the United States. There, the biggest casinos are relatively large facilities compared with those envisaged in the UK. They may have 500 to 5,000 hotel rooms, and 100,000 to 200,000 sq. ft (9,290m², to 18,581 m²) of casino space.⁵⁶ This is much larger than the minimum for a regional casino, 5,000m², likely to be permitted in Britain. They may have anywhere between 2,000 and 5,000 employees. In comparison, a casino in Germany, visited by our Chair and said to be the second largest in Europe, had but 6,729 m² of casino space and a total employment of 500.
100. We should not, therefore, expect job creation on the biggest of world scales. Nothing in this field, in our view, should be taken for granted; much will depend upon the commercial considerations obtaining when the casino is built and thereafter. Moreover, a successful casino is likely to install more tables and games up to the limits permitted and further facilities, and open longer hours, thereby increasing its demand for labour. Several of the proposing authorities had developed their economic impact assessments based on earlier specific proposals for a regional casino. However in most cases, these proposals had been prepared at a time when there was a belief that there would be more than one regional casino permitted under the Act. It is possible that, once the single licence is awarded and the selected authority promotes an appropriate competitive process, a different scale of development could be progressed, thus making the earlier proposal-specific assumptions of benefit redundant.

Location, profitability and social benefit

101. In other respects too, as we see it, the regeneration benefits of a casino proposal must bear a relationship to its potential profitability. This in turn will depend upon the location of the proposal and the relative likelihood of it attracting such a volume of custom as to create added value beyond that of a comparably sized investment in another field.⁵⁷

⁵⁶ Brad Smith, former chairman and chief executive of the New Jersey Casino Control Commission (2006) "Regional Casinos as a source of economic regeneration" *The Regional Casinos Debate: Regeneration and Responsible Gambling in the UK* Proceedings of the Social Market Foundation Conference, July 2006

⁵⁷ "Economic rent" as one academic commentator calls it. See, e.g. Professor Peter Collins (2006) "Economic Rents and Good Causes". *The Regional Casinos Debate: Regeneration and Responsible Gambling in the UK* Proceedings of the Social Market Foundation Conference, July 2006

Through this added value, development of an hotel or hotels could be expected to accompany that of the casino (there is, in any event, a recognised business synergy between large casinos and hotels) whilst judicious use of licensing powers might also obtain desirable conference or entertainment facilities as well as other community benefits. All depends upon the location of the proposal and the relative likelihood of it attracting such a volume of custom as to create added value.

102. Experience suggests that this condition may be at its greatest in or near the country's large conurbations, as well as in places that can attract a good flow of tourists from other places.
103. While we do not have much confidence in any of the submitted models being able to quantify multiplier effects (that is the extent to which the local economy will grow in proportion to the initial investment) the evidence does, in our view, point to the likelihood of multiplier effects relating to the size of the host settlement. That is, the bigger the host settlement, the bigger are the multiplier effects likely to be. This is because the probability of jobs and outsourced services going to local people and firms rather than outside increases with the size of settlement, while the displacement effects, that is local trade, etc. lost to the new development decreases. The exception to this general rule is the resort casino situation, in which the income attracted from the flow of tourists from outside more than compensates for the displacement effects. But this assumes that the resort casino is of a sufficient scale to attract the necessary market demand to support it, when it is less reliant on its local market.
104. Also, in the situation in which casino profits could become available to assist local regeneration activity, we have taken a view both as to the likelihood of what might be forthcoming and also on what the proposing council would do with it in terms of "community benefits".

Chapter 6: Willingness to license

105. Although the 2005 Act⁵⁸ enables local authorities to commit themselves to not wanting a casino in their area, there is no comparable provision to enable them to commit themselves to wanting one in the future. The examples of authorities that withdrew their proposals during the course of their consideration suggested to us that we needed to look behind the decision to submit a proposal in order to test the strength of the commitment.
106. So we considered factors such as political support (did the proposal carry cross-party support within a council?); detail of consideration (did the council have a full-council or executive resolution?); and qualitative inferences of the sort possible from their history of casino consents, media and public support. In this context we found the approach to consulting and involving local people in major proposals such as these unexpectedly patchy.

Chapter 7: Appraisal of the shortlisted proposals for a regional casino

Blackpool

About Blackpool

107. Blackpool is well known as a coastal resort located on the west coast of Lancashire. It grew into prominence in the nineteenth and twentieth centuries along with the rapid industrialisation of its Lancashire hinterland. Since the 1960s, its role as the playground of the North West has diminished as increasingly affluent holidaymakers have sought warmer waters overseas, although it is still a very popular tourist destination. The total resident population of the borough in 2005 was 142,900, to which may be added that of adjacent towns in the Fylde peninsula such as Lytham St Annes, Thornton Cleveleys, Fleetwood and Poulton-le-Fylde making a total resident population for the coastal conurbation of 281,500.⁵⁹
108. The Borough of Blackpool is the 26th most deprived local authority area in England,⁶⁰ lying in the lowest 10 percentile band of multiple indices of deprivation. The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 76.3%, of whom 70.9% were in employment. Unemployment stood at 3.3% in October 2006 against a national average of 2.5%.⁶¹ Among the other regeneration needs of the borough are low average weekly earnings, and the record of having the 9th highest percentage of people reporting a long term limiting illness (24%, against 18.2% in Great Britain).⁶²

The proposal

109. The proposed regional casino is seen by its promoters, Blackpool Council, and the local urban regeneration company, ReBlackpool, as the centrepiece of a proposed conference-casino quarter, including new hotels, which is to be located in a central location on the seafront, close to the world-famous Blackpool Tower. The proposal includes a new 3,000 seat conference centre. The proposed conference-casino quarter is intended as the “driver” of Blackpool’s vision of a “New Blackpool”; a regenerated seaside resort that would be a national and international tourist destination, thereby reversing what the promoters see as steady, if not yet terminal, decline.⁶³ In this respect Blackpool’s is unique among the regional casino proposals.

⁵⁹ Office of National Statistics- official labour market statistics (NOMIS), accessed 20/10/2006

⁶⁰ Taken from column F “Rank of Average Rank” of the ODPM (2004) *Indices of Deprivation 2004* (see www.communities.gov.uk/SOA/LASummaries2004.xls) This, the percentile band information, and similar figures for English areas are based on rank data

⁶¹ *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

⁶² Proposal Document, paragraph 1.4

⁶³ Locum Destination Consulting (2003) *New Vision for Northwest Coastal Resorts NWDA*; Blackpool Council (2006) *EiP Statement*

Consultations with regional bodies

110. The North West Regional Assembly supports the development of regional casinos in Blackpool, Manchester and Liverpool, with their preferred location for the single regional pilot being Blackpool.⁶⁴
111. The North West Regional Development Agency “strongly supports” the Blackpool proposal on the basis that it “would help to restructure a much less diversified and weaker economy than its nearest rival in consideration, Manchester”. To a large extent, this opinion is derived from the Pion Economics Report of 2005.⁶⁵

Regional Spatial Strategy

112. The draft RSS for the North West was submitted to the Secretary of State (now for Communities, and Local Government) in January 2006 and is currently (October 2006 – January 2007) subject to EiP.⁶⁶ The draft RSS, through its explanatory text (8.33-8.38), identifies three places as appropriate for regional casinos, namely Blackpool, Manchester and Liverpool. The regional planning body identifies Blackpool as the priority location for a regional casino because its local economy is deemed to be less buoyant and diverse than Manchester’s (paragraphs 8.33 and 8.34 of draft RSS and Policy W8).⁶⁷
113. However the draft RSS makes clear at paragraph 8.37 that the research that informed the regional planning body’s draft conclusions did not consider the social impacts connected with the development of casino facilities.

Consideration

114. On whether Blackpool would present the best test of social impact, Blackpool has the advantage that it is small in comparison with all the other locations shortlisted for a regional casino, and the number of future events that would also impact on social conditions is likely to be small also. Its socio-economic profile is typical of urban Britain apart from a lower proportion of people of Black and Minority Ethnic origin. The council has also commissioned a base-line leisure survey of adults on the Fylde peninsula. On the other hand, the fact that a casino at Blackpool would draw its custom from a wide area in the North West region and further, would make tracing effects difficult if not impossible. As a declining seaside resort, we note of course that Blackpool’s situation cannot be typical of most of urban Britain.
115. As to mitigating adverse social impact we found Blackpool well experienced in dealing with social problems generally,⁶⁸ with existing 1968 Act casinos (of which there are three in Blackpool) in particular and in respect of a regional casino assisted by a Social Impact Study by Lancaster University.⁶⁹

⁶⁴ Letter dated 14 March 2006 and subsequent representations including case presented at the EiP

⁶⁵ Letter dated 23 December 2005 and subsequent representations including case presented at the EiP

⁶⁶ EiP programme at www.northwesteip.co.uk/downloads/EiP_Programme.pdf, searched on 7/10/2006

⁶⁷ This interpretation of RSS was confirmed at the EiP by Mr Gallagher on behalf of the Regional Planning Body

⁶⁸ *Proposal Document* paragraph. 2.6

⁶⁹ Response to Panel Questions posed on 19 July 2006, response to question 7. We do not find the criticism of this study made at the EiP convincing

116. The fact that most customers would come from outside Blackpool and have to travel would be a deterrent to ambient problem gambling. The proposed central location for the regional casino appears to us to be a good one for it, and conducive to local regeneration, but it is close to some of the poorest residential areas of the town, and so much care would have to be taken if local problems of ambient gambling were to be avoided.
117. There can be no doubt that Blackpool is in need of regeneration, socially and economically, and also in terms of urban infrastructure and (from what we saw) inner urban fabric as well. The overarching question is whether economic decline is such that only the development of a regional casino could stem it. Plainly Blackpool's days as a holiday destination for crowds of industrial workers and their families have declined and the leisure industry there needs to adapt to present day and future conditions. But we do not agree that the record of decline points toward terminal decline, indeed qualitative evidence from the EiP and quantitative data just as easily point to stabilisation at a lower level.⁷⁰ So far as the local authority and regional bodies are concerned, this adaptation may well include the management of contraction and, if so, this situation should be resolutely faced by the authorities and local business alike without visions of external intervention to cure all ills.
118. As we have earlier observed,⁷¹ we find little of the economic modelling to be convincing as to the resolution of controversial matters, given the lack of agreed or otherwise acceptable assumptions in the models. But we note that the local catchment of the casino would be small and that its customers would have to come from a wide area. In the light of our collective experience of such matters we are therefore unsure that the Blackpool proposal would be as viable as other proposals before us. The small local catchment may lead to a suboptimal scale of both the casino and the development of the associated hotel and hence the regeneration benefit.
119. As to bringing the hard to reach into the jobs that would be on offer, we were impressed by the work and agenda of the recently formed Blackpool Employment and Skills Consortium.⁷² Given also that the Fylde urban areas are somewhat removed from others, this fact also would assist local people to get the jobs on offer.
120. While Blackpool's proposal is unique among the seven shortlisted proposals for a regional casino, in many respects Blackpool mirrors the situation in all British cold-water holiday resorts in needing to find a new image for itself in a changing world. The original pre-2005 Act vision of Blackpool re-inventing itself as a casino resort based on a cluster of "resort casinos" on the Atlantic City model was an imaginative vision, but one which is far greater than the present proposal, and is not before us. The present proposal is of necessity limited to one regional casino.

⁷⁰ For example, see graph in the response to Panel Questions posed on 19 July 2006, response to question 2. It may be noted that the data as well fit the lower end of a shallow sigmoid curve as they do a straight line

⁷¹ Chapter 5

⁷² Response to Panel Questions posed on 19 July 2006, response to question 4

121. Weighing the conflicting evidence,⁷³ we have more than a little scepticism about the impossibility of a “Plan B”⁷⁴ (that is, an alternative option for the future of Blackpool). Rather, it seems to us that the reliance for several years on the resort casino concept has inhibited the production of other ideas for addressing decline. Our overall conclusion therefore on regeneration is that the one casino proposed would undoubtedly be useful in assisting in the management of decline but would not reverse decline.
122. Through their ownership of much of the site proposed for a regional casino, it may be expected that the council would be able to maximise the benefits that would be available. The council sees these benefits in terms of the regeneration impact of the proposed casino, including the construction of a new, up-to-date conference and exhibition facility in the central business district. The council also expects to target assistance to vulnerable neighbourhoods through a Community Regeneration Fund, to fund gambling harm prevention services, to support local vocational training and to fund improvements to the central infrastructure of the town.⁷⁵
123. We have much empathy with the view of the regional bodies that Blackpool deserves the choice of the regional casino because its local economy is less buoyant and diverse than others. Nevertheless, for the reasons above, we do not feel able to rank Blackpool favourably compared with others in terms of likelihood of success in achieving regeneration objectives.
124. Notwithstanding the local opposition which found its expression at the EiP,⁷⁶ we found general inter-party support for the proposal on the local council⁷⁷ and other manifestations of local support.⁷⁸ So we are wholly convinced of the local willingness to license a casino were one to be on offer, and we note the support offered to this proposal in a national opinion poll.⁷⁹
125. We do not think Blackpool’s proposal would represent the best test of social impact for the regional casino because most of the social effects would be exported. While it is clear that Blackpool is in need of regeneration, in our view the regeneration benefits of the proposal before us are unproven and more limited geographically than other proposals. If we thought it would fulfil all that is claimed for it, that is to turn round the fortunes of Blackpool, it could be a winner. But we do not think that a regional casino on its own would effect the transformation sought locally, nor optimise the wider regeneration through regional and national economic growth. While we note that willingness to license is high, in the round we do not regard this as the best proposal before us.

⁷³ Evidence presented by Mr David Biesterfield on behalf of Leaguemotion, Mr David Cam of the Blackpool Business Leadership Team and others, and evidence of Mr Weaver of the Borough Council

⁷⁴ To quote from Mr Weaver’s opening address at the EiP

⁷⁵ Response to Panel Questions posed on 19 July 2006, response to question 14

⁷⁶ Mr David Biesterfield on behalf of Leaguemotion, Mr Michael Edwards of the Foxhill Regeneration Association and Mr Steven Bate of the Campaign Against Supercasino Expansion (CASE)

⁷⁷ Response to Panel Questions posed on 19 July 2006, response to question 11

⁷⁸ Such as the local press

⁷⁹ *Populus Blackpool Report*, July 2006. Populus interviewed a random sample of 1036 adults aged 18+ by telephone between 26th and 27th July 2006. Interviews were conducted across the country and the results weighted to be representative of all adults. There were two results, one in which no locations were prompted, the other in which respondents were given the choice of the eight locations then shortlisted. In the spontaneous, unprompted preference 30% answered London, with Blackpool second at 14%, to the question “Where do you think would be the most suitable location in the UK for a ‘Las Vegas-style super casino?’”. In the prompted preference, 38% answered “Blackpool” to the question “Out of these following locations which do you think would be the most suitable location for a ‘Las Vegas-style’ super-casino”

Cardiff

About Cardiff

126. Cardiff, the capital city of Wales, grew rapidly in the nineteenth century as the principal port for the export of South Wales coal and as the commercial centre for the coal and steel complex of South Wales. Today, that complex has disappeared, but Cardiff continues to thrive as a nationally important administrative and commercial centre. It has a resident population of 316,800,⁸⁰ with a further 650,000 living in the adjacent local authority areas of Vale of Glamorgan, Rhondda-Cynon-Taf and Caerphilly⁸¹ making a conurbation total of roughly one million.
127. In terms of indices of multiple deprivation, Cardiff stands in the fifth 10 percentile band of multiple indices of deprivation. However, some 50,000 Cardiff residents live in the 10% most deprived localities in Wales according to the 2005 Welsh Index of Multiple Deprivation and some 56,000 Cardiff residents live in the 10% most deprived areas of Wales in terms of income deprivation.⁸² The areas in which most of these people live are in the “Southern Arc” of the City, nearest to Cardiff Bay.⁸³
128. The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 73.5%, of whom 68.9% were in employment. Unemployment stood at 2.3% in October 2006 against a Great Britain average of 2.5%.⁸⁴ But in one of the wards⁸⁵ nearest to the location of the proposed casino, unemployment stood at 7.2% of the resident working population in 2004.

The Proposal

129. Cardiff’s proposal is seen by its promoters as an integral part of their International Sports Village (ISV) proposal. This proposal fits in with the designation of Cardiff by the Wales Tourist Board as a Strategic Tourism Area and the council’s own Tourism Development Strategy.⁸⁶ The ISV is to be sited on some 30ha of presently undeveloped land at the tip of a peninsula in Cardiff Bay. Following the completion of the Cardiff Bay Barrage, the whole area of former docks and related activity is now the site of major urban redevelopment.
130. In partnership with the former Welsh Development Agency (now part of the Welsh Assembly Government) the council has already selected a preferred operator⁸⁷ for the proposed casino.⁸⁸

⁸⁰ 2004 mid-year estimate quoted in Proposal Document at 1.1.1. Resident population in 2002 was 308,500 (www.elwa.ac.uk/doc_bin/Research%20Reports/101104_Cardiff.pdf)

⁸¹ Mid year estimates for 2002, *ibid.* (www.elwa.ac.uk/doc_bin/Research%20Reports/101104_Cardiff.pdf)

⁸² *Proposal Document*, paragraph 1.1.2

⁸³ *Ibid*

⁸⁴ *NOMIS data* (www.nomisweb.co.uk, accessed 08/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

⁸⁵ Butetown, source – *ibid*

⁸⁶ *Proposal Document*, paragraphs 1.2.1 and 1.3.1

⁸⁷ Aspers, a joint UK and Australian company

⁸⁸ See chapter 1

Consultations

131. Cardiff's proposal is strongly supported by the First Minister for Wales⁸⁹ and the Welsh Assembly Government.⁹⁰
132. The proposal was supported at the Cardiff EiP by a representative of the Department of Enterprise, Innovation and Networks of the Welsh Assembly Government.

Regional Spatial Strategy

133. Wales does not have regional structures on the England model. The Wales Spatial Plan, approved by the National Assembly in November 2004, does not, in general, contain locationally specific proposals, nor does it contain a proposal for the location of a regional casino. It does, however, support proposals directed to increasing the competitiveness of the coastal zone and the South-East – Capital Network area for which the vision is for an “innovative skilled area offering a high quality of life – international, yet distinctively Welsh”.⁹¹

Consideration

134. While this proposal is about Cardiff as a whole, all the evidence before us is about the Cardiff bay site (see our comments in paragraphs 22 and 23 above where we talk about site specificity).
135. In support of the claim made that a casino at Cardiff would provide an excellent opportunity for a “meaningful pilot”,⁹² reference is made to the city's diverse and cosmopolitan population and the highest proportion of ethnic minority residents in Wales, as well as some of the most socially deprived areas of Wales. Moreover, the proposed site would be a self contained destination resort, located away from existing leisure and recreational developments.⁹³
136. As to mitigating potentially adverse social effects of the proposal, the council has drawn together the operator, faith representatives and other organisations including the Police in a group – Community Action for Responsible Gambling, (CARG). The selected operator⁹⁴ has also agreed to establish a community trust fund to support local projects.⁹⁵ However, we have our concerns that all this work is dependent upon the stated co-operation of an individual operator who might or might not gain the licence were it to be put out to another competition.

⁸⁹ Letter to CAP dated 27/06/2006

⁹⁰ Letter from International Business Wales to CAP dated 23/06/2006

⁹¹ *Proposal Document*, paragraph 6.1.1

⁹² Cardiff Council EiP Statement

⁹³ *Proposal Document*, paragraphs 1.5.1 and 1.5.2

⁹⁴ See Chapter 1

⁹⁵ *Proposal Document*, paragraph 2.1.5

137. In evaluating the likelihood of the economic success of a casino in Cardiff, we note first that it is a capital city, but also the relative small size of its catchment area, its semi-peripheral position in relation to the European core of economic activity and its relatively undeveloped international airport at Rhoose. So we would not expect it to be able to offer regeneration and other spin-off benefits comparable to other proposals which are either more centrally situated or which have a larger catchment area.
138. It is clear that the greater part of the regeneration benefit would go toward the early completion of the ISV proposal, and in so doing, complete a chain of regeneration activity that included replacing facilities displaced in city centre regeneration. But our assessment of the evidence suggests that this project would be successful anyway, given time. Although advantage is asserted in completing this project by the Olympic date of 2012, we have little evidence that would positively link Cardiff to the Olympics to any material degree, whatever are the local hopes. So this did not appear to us to be a particularly weighty consideration.
139. The approach of the City Council in working with adjacent local authorities was commendable, not least in their network of Local Training and Enterprise Centres which, among other activities, would be useful in bringing jobless local people into employment. We note also the intention to work with local business and further education to provide training facilities. We were disappointed, however, to find that little prior consideration⁹⁶ had been given expressly to planning for bringing local jobless and hard to reach into the jobs that would be created by the casino and its spin-off activity.
140. Although we note substantial opposition both locally and in the National Assembly to the proposal,⁹⁷ we note also a positive response from a local consultation⁹⁸ and from leading Members of the Assembly⁹⁹ and so we do not, on balance, expect any problem with willingness to license.
141. Cardiff would offer a reasonable pilot for testing social impact and there is evidence there would be a local ability to mitigate any adverse social effects. We also note that there is clear evidence of willingness to license. However in terms of regeneration needs Cardiff's is not the strongest proposal before us, and we note that, while a contribution would undoubtedly be made to local employment opportunities, the regeneration benefits are largely concentrated around the ISV.

⁹⁶ Evidence of Professor John Lovering at the EIP

⁹⁷ *Proposal Document*, paragraph 4.5.2, quoting responses from Ieuan Wyn Jones AM (Plaid Cymru) and Nicholas Bourne AM (Conservative) and letters of representation and evidence at the EIP

⁹⁸ section 4.2

⁹⁹ *Proposal Document*, paragraph 4.5.1 Here is noted the support of First Minister Rhodri Morgan, AM, and Mike German AM. Support is also given by local MP Alun Michael

Glasgow

About Glasgow

142. Founded beside the River Clyde by a Christian missionary, St. Mungo, at the end of the sixth or beginning of the seventh century, Glasgow became a university city in the fifteenth century and from the beginning of the nineteenth century onwards grew to be one of the major industrial cities of the world, earning an enviable reputation in shipbuilding and the construction of railway locomotives.¹⁰⁰ But today, most of the industry that sustained Glasgow's economy for nearly two centuries has gone, and Glasgow's economy has turned into a mixed one, and with a well-established thriving commercial centre serving as the region's main social and economic centre. The city council claims it as the fourth most popular overseas tourist destination in the UK, and as being one of Europe's fastest growing conference and convention centres.¹⁰¹
143. The total resident population of the City of Glasgow in 2005 was 578,800, to which may be added that of districts containing adjacent towns such as Dumbarton, Milngavie, Motherwell, East Kilbride, Paisley and Greenock making a total resident population for the Clydeside conurbation so defined of 1,441,300.¹⁰² We observe that the Clydeside conurbation is also well connected to that of Edinburgh to the east.
144. Despite recent economic growth, with a corresponding fall in unemployment,¹⁰³ the claimant unemployment rate in the city in 2004 stood at 5.3% of the working population, compared with the Scottish average of 3.5% at that time,¹⁰⁴ and with some wards in the city having an unemployment rate of over 12%.¹⁰⁵ By October 2006, the figure had fallen to 4.1% against a Great Britain average of 2.5%.¹⁰⁶ Notwithstanding these figures, the City Council take the view that, with 30% of the working age population inactive,¹⁰⁷ it is high levels of inactivity, rather than unemployment, that is the issue.¹⁰⁸ In fact, by October 2006 the proportion of economically active in the population of working age in the period April 2005 – March 2006 stood at 70.9%, of whom 64.7% were in employment.¹⁰⁹ Of the 1327 data zones in the city, 17% (226) were in the bottom 5% most deprived areas in Scotland¹¹⁰ and there is a severe problem of indebtedness.

100 www.clyde-valley.com/Glasgow/history.htm, downloaded 20/10/2006

101 *Proposal document*, introduction

102 Office of National Statistics- official labour market statistics (NOMIS), accessed 20/10/2006

103 *Proposal document*, section 3.1

104 *Scottish Economic Statistics* www.scotland.gov.uk/stats/ses/ses/ downloaded 20/10/2006

105 Glasgow Economic Facts www.glasgoweconomicfacts.com/library_section/default.htm

106 *NOMIS data* (www.nomisweb.co.uk, accessed 08/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

107 The figure is for 2004

108 *Proposal document*, section 3.1

109 *NOMIS data* (www.nomisweb.co.uk, accessed 08/11/2006)

110 *Proposal document*, section 3.1

The Proposal

145. This proposal is intended as a contribution to the success of the regeneration of the River Clyde Waterfront. Four illustrative locations are identified as options:¹¹¹
- “The Glasgow Harbour”, 51.6ha of former Clyde shipyards where a mixed use development is planned comprising a 16,200 m² casino, a 5-star, 200 bed hotel and other leisure facilities;
 - The Ibrox Football Stadium, where a 15,600m² leisure complex is planned, including the proposed casino, a 120 bed “luxury” hotel, conference and banqueting facilities, other leisure facilities and residential accommodation;
 - St Enoch East, close to the city centre, where a mixed commercial development is planned including the proposed casino and, possibly, residential units; and,
 - The SECC campus area. The Scottish Exhibition and Conference Centre is located on the north bank of the Clyde, close to Junction 19 on the M8 motorway. The masterplan for the development of the SECC includes residential development, an indoor arena, new public spaces and transport improvements as well as the proposed regional casino.

Consultations

146. Scottish Enterprise recognises the considerable economic development opportunities that a regional casino would bring, not only at the local level in terms of employment opportunities but also nationally, as a contribution towards Scotland’s tourism offering.¹¹²

Regional Spatial Strategy

147. There is nothing comparable to the RSS in Scotland.

Consideration

148. Demographically, Glasgow is not dissimilar in its social makeup from other major urban areas in Britain, even though its Black and Minority Ethnic groups (other than Chinese) are somewhat underrepresented. To the extent that testing of social impact would be practical in a large city, it would therefore provide a good test of the social impact of a regional casino in a major urban area. In both establishing base-line and subsequent monitoring, the City Council’s online Case Advice and Information Service (CAIS)¹¹³ should prove useful in debt profiling and monitoring financial inclusion. Also assisting will be the repetition of the 1999 Gambling Prevalence Survey in 2006, particularly if Glasgow’s proposal for an enlarged Scottish sample is implemented.¹¹⁴

¹¹¹ Proposal Document section 5

¹¹² Letter to Glasgow City Council dated 23/6.2006

¹¹³ Proposal Document section 2.6

¹¹⁴ Proposal Document section 2.6 and oral evidence of Cllr Steven Purcell at the EIP

149. We note the good track record of the Licensing Board in dealing with social problems created by cut-price drinking and the use of glass at licensed premises.¹¹⁵ The council recognises the problems caused by the nearness of the proposed locations to some of the poorest areas of the city, but we are impressed with the quality of the policy mechanisms that the City Council has in place to deal with the potential social impacts, for getting people away from problems of addiction and into work, the mechanisms for dealing with debt problems and the track record of the local licensing board in its dealings with its existing five casinos.¹¹⁶
150. Our understanding of the background to this proposal is that Glasgow has a good track record also in the field of physical regeneration, and that a critical mass for regeneration may well already have been achieved in the Clyde Waterfront area even though much remains to be done.¹¹⁷ Indeed we note that the arena needed for the 2014 Commonwealth Games, if Glasgow's bid is successful, is stated to be a regeneration benefit of the casino, yet the council has said that they can deliver it without the casino.
151. Glasgow is in the international tourism market, though another 7 to 10 new hotels are claimed to be needed if the important international conference market is to be tapped to a greater extent.¹¹⁸
152. While the importance of casino jobs to those seeking work was doubted by some, particularly when they involved working anti-social hours,¹¹⁹ we do note also the measures in place for bringing jobs to those who need them, the success in bringing jobs to local people and people from other deprived areas and also the local tradition of flexible, 24-hour working.¹²⁰
153. Given the substantial population in the immediate Clydeside catchment area and its links eastward towards Edinburgh, as well as its established record of drawing in visitors from other parts of Britain and internationally, we have no doubt that a regional casino developed in Glasgow could achieve some success and could be able to yield relatively substantial regeneration and other benefits. The proposal is not lacking in opposition from the point of view of adverse social impact,¹²¹ and there appears to have been little concerted public consultation on the proposal.¹²² While support has been expressed by neighbouring local authorities as far away as Edinburgh,¹²³ little support is given at the level of the Scottish Executive and Scottish Enterprise support is not obviously specific to Glasgow.¹²⁴ So although we note general expressions of community and business support for the proposal and that of the Licensing Board, we are not able to judge the extent of public support, even though in the end we can have little doubt as to local willingness to license.

115 Evidence of Cllr Purcell

116 *Proposal Document*, section 2.2, and oral evidence of Mr Inch

117 Oral evidence of Cllr Purcell

118 *Proposal Document*, section 1.2, oral evidence of Mr Scott Taylor of the Glasgow Marketing Bureau at the EiP

119 Oral evidence of Mr Ken Rolwegen at the EiP

120 Oral evidence of Cllr. Purcell, Mr Steve Inch Mr Euan Jamieson Mr Mike Closier and others at the EiP

121 *Proposal Document*, section 4.6, also evidence of Mr Rolwegen and Cllr Mary Paris at the EiP

122 Oral evidence of Cllr Paris, Mr Rolwegen and Mr Inch

123 Evidence of Mr Inch and letter to CAP from Edinburgh Council of 23/06/2006

124 Letter from Scottish Enterprise to Mr Inch dated 23/06/2006

154. Glasgow offers a generally good prospect as a place for testing social impact. Glasgow has a good track record in dealing with existing casinos and getting people into work. However, despite continuing regeneration needs we are not satisfied that the proposal would do as much to alleviate them as in other proposals. While we would expect the issue of a licence were that to become permissible, we do not note the wider enthusiasm for the proposed casino that we find elsewhere.

Greenwich

About Greenwich

155. The London Borough of Greenwich lies on the south side of the River Thames in East London and within the London Thames Gateway. Its population of 226,000 accounts for 3% of the 7.4 million population of Greater London. It is a borough of contrasts, containing a large number of important historic sites such as the Royal Observatory, Eltham Palace and the Old Royal Naval College, as well as the Greenwich Peninsula, which is a major area of regeneration containing the structure known as the "O₂ Centre" or the Millennium Dome.
156. The borough contains pockets of prosperity but, overall, it is the 23rd most deprived local authority area in England,¹²⁵ lying in the very lowest 10 percentile band of multiple indices of deprivation. The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 75.1%, of whom 68.6% were in employment. Unemployment in the borough stood at 3.8% in October 2006¹²⁶ against a national average of 2.5%.¹²⁷

The proposal

157. The regional casino is proposed in the Millennium Dome (the Dome) on the Greenwich Peninsula, which is currently being transformed into an integrated leisure and entertainment complex with a 23,000 seat arena, exhibition space and a "world-class" hotel.¹²⁸ Other land on the peninsula is being developed for housing, light industrial and business park floorspace, community uses and open space.¹²⁹

Consultations

158. The view of the Mayor of London is that London should have two regional casinos, one at the Dome and one at Wembley.¹³⁰ The proposal is strongly supported.¹³¹

¹²⁵ ODPM (2004) *Indices of Deprivation 2004*

¹²⁶ The second highest of the seven shortlisted proposal areas

¹²⁷ NOMIS data (www.nomisweb.co.uk, accessed 08/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

¹²⁸ *Proposal Document – Introduction*

¹²⁹ House of Commons Committee of Public Accounts: *The regeneration of the Millennium Dome and associated land. Second Report of Session 2005-06*

¹³⁰ Letter to CAP dated 20/2/2006

¹³¹ EIP statement from the Mayor

Regional Spatial Strategy (the London Plan)

159. The London Plan, published in February 2004, regards the Dome as a potential leisure attraction of international significance.¹³² The draft revision of the London Plan proposes two regional casinos, one at the Dome and one at Wembley.

Consideration

160. While this proposal is about Greenwich as a whole, as was confirmed by Greenwich council at the EiP, nevertheless all the evidence before us is about the Dome. Of all the regional casino proposals before us, Greenwich's is the most site specific (see our comments in paragraphs 22 and 23 above where we talk about site specificity). Much was made in the popular press at the time of the EiP of work having been started on casino construction within the Dome.¹³³ And while the council argued at the EiP that an early (if premature) start was advantageous to the proposal, we attach little importance to this consideration, if indeed it is a material consideration at all, having regard to our terms of reference. Although the Dome itself is owned by AEG who are in partnership with a casino operator, to comply with the 2005 Act, they would be willing to review that partnership if the proposal were successful.¹³⁴
161. The council has an impressive database that could well form the basis of a future social impact survey. Being in a central part of Britain's largest city, it could be difficult to isolate the social impacts at Greenwich from the general busy-ness of the capital. Nevertheless, the socio-economic makeup of the borough, diverse as it is, could present a reasonably representative example of big-city, urban Britain, while the centre of Greenwich, but not the whole borough, can justifiably be considered as a village within the wider urban fabric.
162. Situated at the tip of the Greenwich peninsula, the Dome is sited well away from the older residential areas and areas of deprivation, though the progress of redeveloped new housing is steadily bringing new residential areas closer. We do not therefore expect any unusual problems of ambient gambling.
163. A feature of the labour market in London is the existence of substantial pockets of unemployment in close proximity to jobs being taken by migrant workers. In this regard, we found very helpful Greenwich Council's 10 year old collaboration with developers and other local employers, Job Centre Plus, training providers and community sector organisations in the Greenwich Local Labour and Business (GLLaB) to bring long term unemployed into job opportunities.

¹³² *Ibid*

¹³³ E.g. *The Evening Standard* of 22/08/2006 "Secret Start on Dome's Casino – Work is under way, but there's no licence or planning consent"

¹³⁴ Questioning of AEG at the EiP

164. With London as its catchment area, London's pull in the international tourism market and the substantial regeneration plans of the Thames Gateway area, there are good prospects as to the commercial success of the casino proposal. Its prospects would doubtless be enhanced by proximity to Olympic venues. Nevertheless, we have difficulty in accepting the assertion that, without a casino, it would be unlikely that the commercial potential of the Dome, for example in the achievement of a major international hotel, would be realised.¹³⁵ Such an hotel is proposed as part of the scheme envisaged in the deal struck with English Partnerships for the sale of the Dome.¹³⁶ Whether a second hotel might be included in the scheme appears to us to depend on the commercial prospects of the hotel itself, in turn dependant on the wider regeneration of the area. Given the proximity of the site to the Olympic venues and its general attractiveness, the prospects for a second hotel might be good, but would not be so secure as to be a factor to be taken into account in balancing the merits of the proposal.
165. Notwithstanding the continued need for improvement in the economic and social spheres, we could not escape the observation that redevelopment in the Greenwich Peninsula is, to a very large extent, already happening. The ground has been remediated, an improved transport infrastructure is in place, and urban redevelopment is already proceeding apace. So we have our reservations about the idea that the regional casino is a necessity for the continued regeneration of the area.
166. We note that, in the deal struck with English Partnerships for the sale of the Dome, the development of a regional casino was not envisaged. We note also that some of the profits of the scheme will go to English Partnerships thereby reducing the community benefits available to the local authority.¹³⁷
167. As to willingness to license, we note the wholehearted support of the council and many local stakeholders.
168. And we note that in an opinion survey commissioned by Blackpool council, 30% of those asked the question "Where do you think would be the most suitable location for a 'Las Vegas-style' super casino?" replied 'London'.¹³⁸
169. In an area in need of social and economic regeneration (though by no means the worst of the areas before us), the strength of Greenwich's tourism potential and catchment area is likely to maximise investment and so jobs offered in the casino. In terms of offering jobs to the local community, local people would benefit. It has strong regional support. However, our view is that the proposal suffers from uncertain additionality as regards regeneration benefits in general and the proposal to develop a casino in Greenwich is unconvincing as to offering the best possible location in which to test social impact.

¹³⁵ Questioning of Greenwich Council and AEG at the EIP

¹³⁶ House of Commons Committee of Public Accounts: op.cit

¹³⁷ House of Commons Committee of Public Accounts: op.cit

¹³⁸ *Populus Blackpool Report*, July 2006. op cit See also results for Blackpool, footnote 79 above

Manchester

About Manchester

170. Manchester is a diverse city of some 441,200 people,¹³⁹ located at the centre of a wider conurbation, Greater Manchester, with a resident population of over 2.5 million.¹⁴⁰ Always a commercial centre for the North West Region, it developed a major manufacturing complex (engineering, textile machinery, locomotives) in the nineteenth century which grew into more sophisticated products such as electrical equipment and electronics in the twentieth. With the decline in traditional industries at the end of the twentieth century, the city has diversified and reinforced its commercial function.¹⁴¹
171. Of all the proposals before us, Manchester has the highest ranking in terms of multiple deprivation. Although containing one of the country's fastest growing economies,¹⁴² the City of Manchester is the third¹⁴³ most deprived local authority area in England,¹⁴⁴ lying in the lowest 10 percentile band of multiple indices of deprivation. Twenty percent of Manchester residents are currently in receipt of income support, twice the national average. Looking more locally, more than 13 of the 38 super output areas¹⁴⁵ within the New East Manchester boundary (see below) are ranked among the 100 (0.3%) most deprived in England out of 32,482.¹⁴⁶ The proportion of economically active in Manchester's working age population in the period April 2005 – March 2006 was 67.4%, of whom 61.5% were in employment. Unemployment stood at 3.9% in October 2006 against a national average of 2.5%.¹⁴⁷

The proposal

172. The proposed location for the casino is in the area of "SportCity", a sports and culture-led regeneration complex containing among other features the new City of Manchester Stadium. It is sited in a major regeneration area, "New East Manchester", a 1900ha area situated immediately east of the city centre, which earlier had been the site in which polluting industry was in all too close proximity to rows of poor terraced housing. It remains one of the most deprived areas in the country and the focus of a considerable regeneration programme.

Consultations

173. The North West Regional Assembly welcomes the inclusion of both Blackpool and Manchester in the shortlist of candidate locations, but prefers Blackpool as the preferred location for the pilot regional casino.¹⁴⁸

¹³⁹ ONS mid-year estimates www.manchester.gov.uk/planning/studies/keyfacts.htm#People%20and%20households, searched 24/10/2006

¹⁴⁰ *Ibid*

¹⁴¹ *Proposal Document*, section 1 and other background

¹⁴² *Proposal Document*, section 2, quoting ODPM (2002) *State of English Cities* vol.2, p.107

¹⁴³ Second, if ranking of average scores is taken instead of rank of average rank. See footnote below

¹⁴⁴ ODPM (2004) *Indices of Deprivation 2004*

¹⁴⁵ Super Output Areas (SOAs) are a new geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. Their first statistical application was for the *Indices of Deprivation 2004*, giving them instant publicity and usage across the local government sector. It is envisaged that they will eventually become a standard across National Statistics and beyond. There are 32,842 SOAs in England. www.statistics.gov.uk/geography/soa.asp, searched 24/10/2006

¹⁴⁶ Paper submitted by Manchester at the EIP, based in ODPM 2004 *Indices of Deprivation*

¹⁴⁷ *NOMIS data* (www.nomisweb.co.uk, accessed 08/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

¹⁴⁸ Letter to CAP dated 12/6/2006

Regional Spatial Strategy

174. The draft RSS was submitted to the Secretary of State (now for Communities, and Local Government) in January 2006 and is currently (October 2006 – January 2007) subject to EiP.¹⁴⁹ The draft RSS, through its explanatory text (8.33-8.38), identifies three places as appropriate for regional casinos, namely Blackpool, Manchester and Liverpool. The regional planning body identifies Blackpool as the priority location for a regional casino because its local economy is deemed to be less buoyant and diverse than Manchester's (paragraphs 8.33 and 8.34 of the draft RSS and Policy W8).¹⁵⁰
175. However the draft RSS makes clear at paragraph 8.37 that the research that informed the regional planning body's draft conclusions did not consider the social impacts connected with the development of casino facilities.
176. At the meeting of the regional planning body that approved the draft for submission to the Secretary of State the members from Greater Manchester "did not feel able to endorse the document",¹⁵¹ but agreed its submission on the basis that it could be subject to "further amendment during the public consultation exercise".

Consideration

177. While this proposal is about Manchester as a whole, all the evidence before us is about New East Manchester (see our comments in paragraphs 22 and 23 above where we talk about site specificity).
178. Although Greater Manchester's demographics are close to the national profile,¹⁵² it would not be easy to trace the city-wide social impact of the proposal against the background of many other factors in such a large city region. This would be less true, however, of East Manchester, where it would be relatively easy to adduce impacts, favourable and unfavourable, in this very deprived sector of the city.
179. The council has developed a "Social Responsibility Framework" based on consultation with police, health and education bodies, voluntary organisations including faith communities, individual experts and casino operators, existing and potential. A Responsible Gaming Unit under the supervision of the Chief Executive is proposed to bring together licensing, planning and community welfare.¹⁵³
180. Given the facility to develop a regional casino in their area, the council would set up a single unit to obtain relevant data before and during its operation, drawing on the work of their Social Responsibility Framework and their Responsible Gaming Unit.
181. We were impressed by the consultations on those matters with other local authorities and relevant bodies. This evidence, in our view, gives us confidence as to Manchester presenting a good place in which to test social impact.

¹⁴⁹ EiP programme at www.northwesteip.co.uk/downloads/EiP_Programme.pdf, searched on 7/10/2006

¹⁵⁰ This interpretation of RSS was confirmed at the EiP by Mr Gallagher on behalf of the Regional Planning Body

¹⁵¹ *Minutes of the North West Regional Assembly, 13 January 2006*, item 5

¹⁵² Table submitted by Manchester at the EiP

¹⁵³ *Proposal Document*, section 3, statement of Sir Howard Bernstein and oral evidence of Mr Paul Bellringer at the EiP

182. Much of the action referred to in the evidence lies in the future. Nevertheless, we gained the clear impression that any adverse social problems, notably the problem of ambient gambling, arising from the establishment of a casino in this very deprived area would be tackled in a thorough and workmanlike manner. Clearly great care would have to be taken. In this respect, the city council can be considered a “safe pair of hands”.
183. In terms of need for regeneration, we have little doubt that Manchester’s need is as great or greater than any.¹⁵⁴ While we observed on our visit that much of the area of “New East Manchester” had been or was being redeveloped (that is most old property had been replaced by new, and derelict land built upon) the need for regeneration in its fullest sense (that is including economic and social factors) in the area was as great as ever.
184. The question therefore is the extent to which the proposal would bring benefits. With a resident population of over 2.5 million, and at the centre of the main concentration of population in the North of England, the catchment of a casino in Manchester would be second only to London. And as a well established and growing tourism destination Manchester would undoubtedly make a very successful location for a regional casino. So we consider that Manchester would be a very successful commercial location for a regional casino.
185. The fact that substantial deprivation remains in the area despite progress in this field, including the Commonwealth Games and other new activities, does, however, lead us to urge that continued efforts are made to ensure local regeneration benefits.
186. In this context, while the council had so far not made firm decisions as to how the community benefits (that is, benefits in terms of revenue from licensing and other sources) might be used, we were impressed that they would be consulting widely and across the whole conurbation on the nature of those community benefits. That, we thought, meant that benefits would really be felt in local communities and would be what those communities would benefit from, not something imposed. We felt that the council had the mechanisms in place to deliver benefits. We were also impressed with the work of the council in working with residents’ associations, in understanding hard to reach groups, and in getting local people into jobs through work graphically described as “pre-recruitment”.¹⁵⁵ These last points are illustrated by the fact that the opening in 2002 of a large Walmart-Asda store in the area attracted 90% of expressions of interest in the 850 jobs on offer from within a 15 minute journey of the site.
187. We were very impressed by the strong will shown by the local authority and its local supporters in pursuing this proposal in the face of possible equivocation from regional bodies and we have no doubts as to willingness to license. We note that Manchester (with Sheffield and Newcastle) is one of England’s eight “Core Cities” which Government policy sees as drivers of national and regional economic growth. Manchester is also (with Leeds, Newcastle and Sheffield) one of a different eight cities in the Northern Way which are seen as key to the economic progress of the North (see footnotes 195 & 196).

¹⁵⁴ In England, only the London Boroughs of Hackney and Tower Hamlets are worse. Neither submitted a casino proposal

¹⁵⁵ Oral evidence of Mr Tom Russell at the EIP

188. In every respect we are extremely impressed by Manchester's proposal, which offers great promise. We found that the proposal had a unique formula to offer which served to set it apart from the others presented to us in terms of the full range of our specific remitted criteria of best test of social impact, regeneration need and benefits and willingness to license. Manchester represents a good place to test social impact, and the council's consultations with other local authorities and relevant bodies gave us confidence on that. Manchester has a catchment area for a casino second only to that of London, and it is an area in need of regeneration at least as much as any of the others we observed – indeed, the city has the greatest need in terms of multiple deprivation of all the proposals before us. We are impressed that the council's plan has been developed, and is proposed to be taken forward, in close consultation with the communities that would benefit from it. At the same time Manchester, as one of England's eight "Core Cities" and as one of the cities in the Northern Way, has a pivotal role in the regeneration of Northern England. In our view the proposal presents the most complete package in terms of meeting our remitted criteria.

Newcastle

189. Newcastle, the administrative and commercial capital of the Tyneside conurbation and the wider North East Region, has a population (at 2005) of 269,500. The Tyneside conurbation has a population of 802,900.¹⁵⁶ Formerly the centre of a major shipbuilding area, Newcastle is remarkable for its mix of old and new. The Norman castle, traces of Hadrian's Wall, a medieval cathedral, are all reminders of the city's rich history, while modern innovative landmarks, like Newcastle and Gateshead quayside represent the region's energetic rejuvenation.
190. Socio-economically, Newcastle exhibits considerable polarisation. While the city and wider region saw significant economic restructuring in the 1970s and 1980s, a substantial proportion of the city's residents have not shared in rising prosperity.¹⁵⁷ The City of Newcastle is the 48th most deprived local authority area in England,¹⁵⁸ lying in the second lowest 10 percentile band of multiple indices of deprivation.¹⁵⁹
191. Within Newcastle, it is evident from the index that some areas of the city are considerably more deprived than others. Traditionally deprived areas lie to the west of the city centre including the two wards – Benwell and Scotswood, and Elswick – both of which fall within the 10% most deprived areas in England.¹⁶⁰ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 70.9%, of whom 61.5% were in employment. Unemployment stood at 3.2% in October 2006 against a national average of 2.5%.¹⁶¹

¹⁵⁶ As defined by the NUTS3 statistical subregion. Data from Proposal Document, p.2, quoting ONS mid-year estimates 2004

¹⁵⁷ Proposal Document, section 2

¹⁵⁸ ODPM (2004) *Indices of Deprivation 2004*

¹⁵⁹ See note at chapter 4 paragraph 91

¹⁶⁰ www.newcastle.gov.uk/core.nsf/a/imd2004?opendocument

¹⁶¹ *NOMIS data* (www.nomisweb.co.uk, accessed 08/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

The proposal

192. The city council is promoting a “Discovery Quarter” immediately to the west of the city centre, and located between the commercial/retail core of the centre and areas including the two above-mentioned wards with their significant levels of unemployment and other deprivation. The council sees the casino as providing a much needed conference centre.

Consultations

193. Both the Regional Assembly and ONE NorthEast (the Regional Development Agency) support Newcastle’s proposal.¹⁶²

Regional Spatial Strategy

194. The draft RSS for the North East was the subject of an EiP in March/April 2006. Draft Policy 17 of the RSS supports the development of a regional casino in the major urban cores of the region such as Newcastle. This strategy was supported by the EiP Panel in their report published on 4 August 2006.¹⁶³

Consideration

195. As to test of social impact, Newcastle exhibits a profile that is typical of major urban areas in Britain. Newcastle is also a relatively small city, and its urban hinterland is relatively remote from other urban areas, and so it would be relatively easy to identify the impacts of a particular project. The council is also able to monitor socio-economic trends through their Newcastle Neighbourhood Information Service (NNIS).
196. The proposed “Discovery Quarter” appears to us to present much promise for regeneration. Development of a casino in it would present synergy with other developments there and with “Science City”.¹⁶⁴ But the area is close to some of the poorest residential areas of the city, and so the siting of a regional casino would have to be treated with care, if problems of ambient gambling were to be avoided.¹⁶⁵ In terms of economic regeneration, Newcastle appears to be improving without the opportunities presented to its rivals, such as the Commonwealth Games, the Olympics and the like.
197. For Newcastle, bringing people into work is a priority, and work done in collaboration with existing casino operators has demonstrated the success of partnership schemes with Newcastle College and other training agencies to develop local recruitment and training programmes.¹⁶⁶ However, it seemed to us from this evidence that Newcastle was less well advanced than others in preparing the way for long term unemployed and other hard to reach groups to take the jobs that would be on offer.

¹⁶² Joint letter to CAP dated 28/6/2006

¹⁶³ Letter to CAP dated 10/8/2006

¹⁶⁴ Evidence of Mr Rubinstein at the EiP

¹⁶⁵ Evidence of Mr Dobson and Mr Rubinstein

¹⁶⁶ EiP statement paragraph 3.3, evidence of Mr Rubinstein and Mr Dixon

198. While the current work of the North East Council on Addictions (NECA) attracts commendation, its effectiveness in dealing fully with the social problems that could arise would require additional funding, which it is assumed would be available if a casino were developed.¹⁶⁷
199. We note that Newcastle (with Sheffield and Manchester) is one of England's eight "Core Cities" which Government policy sees as drivers of national and regional economic growth. Newcastle is also (with Leeds, Manchester and Sheffield) one of a different eight cities in the Northern Way which are seen as key to the economic progress of the North (see footnotes 195 & 196). Newcastle has witnessed substantial recent growth in tourism, and in building a critical mass of facilities upon its undoubted natural and man-made assets, its plans for its further development are impressive. Newcastle's regeneration needs are not as significant as they were. The local Chamber referred to the city's vibrant economy, and the city council said there was already a critical mass in the leisure economy.¹⁶⁸
200. Newcastle sees the next step as the development of a major regional conference centre and believes that the only key to unlocking this is through the funding mechanism from a regional casino. While such a conference centre is undeniably a valuable addition to any major regional city, we do not find this as compelling a regeneration benefit as those of other proposals. Nor have we been sufficiently convinced of the market and financial viability of such a development, particularly given the limited catchment area of Newcastle and its relative remoteness. Despite its plans for expansion, Newcastle Airport presently caters more for outbound passengers than inbound.¹⁶⁹ All this means that Newcastle's market potential is not as strong as some other proposals before us.
201. As to willingness to license, we note that a public consultation exercise undertaken in March 2006 indicated a majority of both residents and city centre users in favour of the proposal,¹⁷⁰ though we also note the opposition of a minority of faith groups.¹⁷¹ The issue has been fully debated in Full Council and is not a divisive issue. If there were a change of party control, it is unlikely that policy would change, because a majority in all major parties supports the proposal.¹⁷²
202. Whilst this is a sound proposal in terms of best test of social impact and regeneration need, the evidence to our mind suggests that the regeneration needs and the likely regeneration benefits that the proposal would bring are not as strong as elsewhere.

¹⁶⁷ *Proposal Document* section 3, oral evidence of Mr Paul Rubinstein on behalf of the City Council, Mr Humphrey Dobson of the Christian Institute, and Cllr J Shipley

¹⁶⁸ EIP Evidence of Mr Rubinstein and Mr R McMullen

¹⁶⁹ Evidence of Mr Dixon and others

¹⁷⁰ *Proposal Document* section 5

¹⁷¹ Response to Panel questions, August 2006, p.24

¹⁷² Evidence of Mr Rubinstein

Sheffield

About Sheffield

203. Situated in South Yorkshire at the edge of the Pennine hills, Sheffield has a resident population of 516,000,¹⁷³ making it England's fourth largest city. The city region of Sheffield, including the towns of Barnsley, Rotherham and Doncaster, has a population of over 1.7 million.¹⁷⁴ The city grew to become one of the leading steel making centres of Britain, very dependent on heavy industry and mining. But the decline of heavy industry in the city has left it with large areas of industrial dereliction and urban deprivation, not least in the Lower Don Valley, which was the principal location of the steel industry in the city. Sheffield now hopes to "re-position (itself) as a sustainable tourism destination".¹⁷⁵
204. Sheffield, as a local authority area, was ranked 82nd among local authorities and lies in the third lowest 10 percentile band of multiple indices of deprivation,¹⁷⁶ it is very polarised in this regard, ranking in the lowest 10% in terms of "local concentrations of deprivation", with three wards in the Lower Don Valley in the lowest 2% nationally.¹⁷⁷ Indeed Darnall has been identified as having the lowest average income in Britain in the CACI Annual Wealth Survey 2006.¹⁷⁸ From 1979 the Gross Domestic Product (GDP) per head across the city region fell year on year until 1995 when it reached 74.4% of the EU average, qualifying it for Objective 1 assisted area status.¹⁷⁹
205. The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 74.3%, of whom 66.3% were in employment. Unemployment stood at 3.0% in October 2006 against a national average of 2.5%.¹⁸⁰

The Proposal

206. No specific site is proposed by the local authority for the regional casino, although there are three existing proposals by commercial consortia: at Bramall Lane near the city centre and two in the Lower Don Valley. The City Council has a "Masterplan" for the regeneration of the Lower Don Valley, building on the leisure and sporting facilities already located there. A regional casino is considered an appropriate end use in this area¹⁸¹ and we have taken it to be the broad location proposed for a regional casino.

Consultations

207. Sheffield's proposal is strongly supported by the Yorkshire and the Humber Regional Assembly¹⁸² and by Yorkshire Forward (the Regional Development Agency).¹⁸³

¹⁷³ *Proposal Document*, p.3, quoting ONS mid-year estimate for 2004

¹⁷⁴ Figure also includes the population of the districts of Bassetlaw, Chesterfield, North East Derbyshire and Derbyshire Dales, and is taken from the *Proposal Document*, p.3

¹⁷⁵ *Proposal Document*, p.4

¹⁷⁶ ODPM (2004) *Indices of Deprivation 2004* <http://www.communities.gov.uk/odpm/SOA/LASummaries2004.xls>

¹⁷⁷ *Proposal Document*, p.5

¹⁷⁸ Additional statement document, dated August 2006, page 3

¹⁷⁹ *Proposal Document*, p5

¹⁸⁰ *NOMIS data* (www.nomisweb.co.uk, accessed 08/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

¹⁸¹ *Proposal Document*, pp.4&5

¹⁸² EIP Statement

¹⁸³ Letter to CAP dated 4/9/2006.

Regional Spatial Strategy

208. The draft RSS, the Yorkshire and Humber Plan,¹⁸⁴ identifies both Sheffield and Leeds as the preferred locations for a regional casino. Other policies in the plan call for the economic transformation of under-performing areas of South Yorkshire (including Sheffield),¹⁸⁵ and there is a specific call for increased growth of tourism in South Yorkshire.¹⁸⁶

Consideration

209. We note that, with the exception of high levels of deprivation and unemployment and inactivity rates, Sheffield has a socio-economic profile that is not dissimilar from the UK as a whole.¹⁸⁷ Impact testing would be much assisted by the council's neighbourhood analysis systems.¹⁸⁸
210. Whilst some of the most deprived residential areas are in the Lower Don Valley, we perceive that the availability of sites is such that a regional casino in this area would not need to be sited close to them.¹⁸⁹ We would not therefore expect any particular local problems from ambient gambling. The council has commissioned a casino task group, chaired by the Bishop of Sheffield, to identify the practical steps needed to maximise the benefits and minimise the negative impacts of a regional casino in the city.¹⁹⁰ Our impression of the council's approach to gambling problems suggests that they would be as successful as any in dealing with them.
211. Although Sheffield as a whole appears to be rising steadily from its economic problems of earlier years – it has experienced six years of economic growth above the EU average, for example¹⁹¹ – there can be no doubt, in our opinion, of the continued need for intervention to secure the continued regeneration of the Lower Don Valley. A casino development there aimed at promoting tourism would accord with the draft RSS. The Lower Don Valley has seen the development of a number of successful leisure, sporting and other facilities such as Meadowhall shopping centre, the Don Valley stadium, and Sheffield arena. The casino would be an additional and complementary facility for this regeneration theme. The council sees the casino as a mechanism to deliver funding for essential infrastructure to facilitate further development, such as transport in the form of the supertram extension and flood protection works in the Lower Don Valley.
212. As there is a high proportion of ethnic minority population in the area, we explored at the EIP the question of whether local people of the Islamic faith would take up jobs in the casino and casino related jobs in the knowledge that Islam regards gambling as sinful. However, we were assured that many, if not most, would accept this sort of employment, just as they participated in the local economy in other ways.¹⁹²

184 Draft submitted in December 2005

185 *Proposal Document*, p.20. References in the draft RSS are to s.4.6 and policies YH1,YH3, YH4,YH6 and YH8

186 *Proposal Document*, p.4

187 *Proposal Document*, p.5

188 The Sheffield Neighbourhoods Information System (SNIS) described at p.6 of the *Proposal Document* and referred to in the oral evidence of Ms Val Trotter at the EIP

189 Also evidence of Sir Robert Kerslake

190 The Sheffield First Partnership Casino Task Group, see *Proposal Document*, paragraph p.6

191 Oral evidence of Mr Tom Riordan at the EIP

192 Oral evidence of Cllr. Mahzer Iqbal, representing the Darnall Area Panel

- Whether the presence of a regional casino in the area would lead to a breakdown in social cohesion¹⁹³ is, to our mind, purely speculative, given this evidence.
213. Sheffield has well developed mechanisms for dealing with social problems which are proposed to be enhanced through the community benefits to be obtained through the licensing process. These mechanisms would include measures for dealing with “doorstep lending”, and Employment and Skills Strategy designed to develop the local labour market, remove barriers to growth and create more jobs. A Work and Skills Board under the auspices of Sheffield First Partnership would, also as a community benefit obtained from the casino, provide the local framework through which the impact of a regional casino on the skills and training of local residents will be maximised.¹⁹⁴
214. We note the support of both the regional planning body and the Regional Development Agency for this proposal, and our attention is drawn also to Sheffield (with Manchester and Newcastle) being one of England’s eight “Core Cities” which Government policy sees as drivers of national and regional economic growth.¹⁹⁵ Sheffield is also (with Leeds, Manchester and Newcastle) one of a different eight cities in the Northern Way which are seen as key to the economic progress of the North.¹⁹⁶ In the Objective 1 Single Programming Document, Sheffield was seen as a key catalyst for broader South Yorkshire sub-regional economic growth and regeneration.¹⁹⁷ However Sheffield does not have the biggest catchment, it is not the most accessible area, and in particular it does not have the national and international status of some of the other proposals we have seen.
215. On willingness to license we note the formal resolution of 1st December 2004 to support the proposal of the city council and general all party support.¹⁹⁸ The extent to which this resolution is supported by the local public at large appears to be confirmed by opinion polls sponsored by potential operators and in consultation with the local Chamber of Commerce. However, support is by no means unanimous, in particular from faith groups¹⁹⁹ and small and medium sized enterprises.²⁰⁰
216. Sheffield would be a good place in which to test social impact. The council appears sound as regards dealing with social problems, and their proposal is well supported regionally. Much thought has been given to potential community benefits. However while there remains a strong regeneration need in places like the Lower Don Valley, such has been the success of the city generally in achieving regeneration to date that it remains in lesser regeneration need than others. We also believe that Sheffield’s location, catchment and accessibility would not optimise the potential regeneration benefits compared with some of the other proposals before us.

192 Oral evidence of Cllr. Mahzer Iqbal, representing the Darnall Area Panel

193 *Proposal Document*. p.20

194 *Proposal Document*. pp.10 & 11, evidence of Mr John Hudson of Sheffield First for Investment

195 *Proposal Document*. p.20. See also, e.g., ODPM, HM Treasury and DTI (2004) Third Report of the Core Cities Working Group

196 *Proposal Document*. p.20. See also ODPM (2004) Making it happen: The Northern Way and subsequent documents of similar title

197 *Proposal Document*. p.19

198 *Proposal Document*. p.15 and oral evidence of Sir Robert Kerslake on behalf of the City Council

199 Oral evidence of Mr David Price of Church Action on Poverty in Sheffield and Ms Jillian Creasy of Sheffield Campaign against Supercasino Expansion

200 Oral evidence of the Rev’d Nigel Manges of the South Yorkshire Baptist Association and Mr Neville Martin of the Christian Peoples’ Alliance

Chapter 8: Appraisal of the shortlisted proposals for large and small casinos

Bath and North East Somerset

About Bath and North East Somerset

217. The Bath and North-East Somerset Council area is a mixed rural and urban area in the west of England with a resident population of 173,700 in 2005.²⁰¹ The City of Bath itself, with a resident population of 84,000,²⁰² has a strong heritage base – it has World Heritage status – and an inland tourism orientation. It is stated to attract 2.5 million visitors a year²⁰³ but the visitor economy in Bath is in decline and there is a reduction in international visitors.²⁰⁴
218. The area generally is by no means a deprived one, being 259th in the ranking of most deprived local authority areas in England²⁰⁵ and lying in the eighth lowest (third highest) 10 percentile band of multiple indices of deprivation.²⁰⁶ There are, nevertheless, pockets of deprivation within the worst 20% in England²⁰⁷ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 76.3%, of whom 70.9% were in employment. Unemployment stood at 1.1% in October 2006 against a national average of 2.5%.²⁰⁸

The proposal

219. A small casino is proposed in the city centre of Bath which would emphasise gaming tables rather than machines in order to attract better off visitors and minimise adverse social impact and augment its established tourism market. There is evidence of operator interest in developing a small casino in Bath.²⁰⁹

Consultations and regional considerations

220. Although the South West Regional Assembly has an agreed policy on regional and large casinos in the region, it is not able to provide a detailed response on others.²¹⁰ Bath is identified in the relevant RSS amongst strategically significant cities and towns where growth is to be located.²¹¹

²⁰¹ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006)

²⁰² Proposal Document, p.11

²⁰³ *ibid.* p.4

²⁰⁴ Supplementary submission, p.1

²⁰⁵ ODPM (2004) *Indices of Deprivation 2004*

²⁰⁶ *ibid.* percentile bands of average score

²⁰⁷ Proposal Document, p.9

²⁰⁸ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

²⁰⁹ Proposal Document p.20, Supplementary Submission, p.2

²¹⁰ Letter to CAP dated 31/7/2006

²¹¹ Response to Panel questions, p.4

221. While Bath is not a priority area for regeneration, in the view of the Regional Development Agency, the city is recognised as a “key area” for the focused delivery of growth and regeneration.²¹²

Consideration

222. Being a relatively small town, the social impact of a casino in Bath would be easy to trace locally, but it would be less easy to trace the impact on visitors. The council is beginning a research project to identify any “at risk” groups within a 30 minute drive time of the city centre.²¹³ The proposal would, however, in our view, offer a unique opportunity to test social impact of a specialised type of casino in a heritage setting.
223. A City Centre Management Group brings together a range of stakeholders to address management issues, and the council expects to continue this co-operation to deal with any problems caused by the casino.²¹⁴ We see no special local problems in this regard.
224. Wage levels are relatively low and there is an acute house price to earnings ratio. With the average stay being below two nights,²¹⁵ the local focus is on increasing the number of staying visitors and their length of stay. The proposal for a small casino will play a part in strengthening Bath’s visitor economy by assisting in improving repeat visit performance.
225. As we see it, the regeneration attraction of the proposal lies mainly in the provision of jobs, the strengthening generally of the visitor economy through the attraction of well-to-do gamblers and a reduction in reliance on public sector jobs.²¹⁶
226. There is some local objection based on opposition to gambling generally, but, after local consultation, Full Council on 14th September 2006 resolved to support the proposal in principle. We therefore have no doubts as to willingness to license.
227. While Bath does not have the level of pressing regeneration needs that many others face, its tourism economy needs strengthening. It is a good all round proposal, the best feature of which is that it would offer a unique opportunity to test social impact of a specialised type of casino in a heritage setting.

Bournemouth

About Bournemouth

228. The Borough of Bournemouth is a well known and substantial seaside town on the south coast of England and the centre of a conurbation which includes Poole, Christchurch and towns such as Wimborne Minster in the District of East Dorset. The borough’s 2005 resident population amounted to 173,700, and that of the

²¹² Letter to CAP dated 28/6/2006

²¹³ *Supplementary Submission*, p.1

²¹⁴ *Proposal Document*, p.11

²¹⁵ *Proposal Document*, p.7

²¹⁶ *Supplementary Submission*, p.1

conurbation as a whole 431,000.²¹⁷ The area grew rapidly in the post war period as the centre for insurance and other business activities. Bournemouth is stated to receive almost 1.5 million staying tourists a year and a further 3.8 million day visitors.²¹⁸ Its tourist accommodation amounts to 18,000 bedspaces.²¹⁹

229. Bournemouth's tourism economy appears to be more successful than many,²²⁰ and one in four jobs in the borough depend on tourism.²²¹ The borough is the 96th most deprived local authority area in England,²²² lying in the third lowest 10 percentile band of multiple indices of deprivation.²²³ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 79.8%, of whom 77.0% were in employment. Unemployment stood at 2.0% in October 2006 against a national average of 2.5%.²²⁴ There is evidence of several concentrations of deprivation in the resort and the house price to earnings ratio is adverse.²²⁵

The proposal

230. A large casino is seen in the council's Tourism Development Strategy/Cultural Strategy as the anchor of a development including a cultural centre, an artificial surfing reef and a high quality entertainment/eating complex.²²⁶ The town centre is regarded as the most appropriate location for the proposed casino where it would contribute to the critical mass of leisure and cultural facilities.²²⁷

Consultations and regional considerations

231. The South West Regional Development Agency has given its support to two casino bids in the region, one of which is the Bournemouth proposal.²²⁸

Consideration

232. This location offers a good opportunity to test the social impact of a large casino development in a seaside resort that has focused on business visitors. In other respects the proposal is not among the strongest – its ethnic composition is atypical of the country as a whole and its economic dynamism would make the tracing of social impacts difficult.
233. A "Hospitality Gateway" partnership between the council and the Jobcentre Plus which prepares people for employment in the hospitality industry, will be developed with the selected operator following the example of Newcastle.²²⁹

²¹⁷ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006)

²¹⁸ Proposal Document, paragraph 6.2

²¹⁹ Response to Panel Questions, paragraph 8.1.i

²²⁰ Proposal Document paragraph 1.2

²²¹ Proposal document paragraph 1.1.4

²²² ODPM (2004) *Indices of Deprivation 2004*

²²³ *Ibid.* percentile bands of average score

²²⁴ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

²²⁵ Proposal Document, paragraph 1.4t

²²⁶ *Ibid.*, paragraph 1.2

²²⁷ Supplementary information, response to question 6

²²⁸ *Ibid.*, response to question 4

²²⁹ Supplementary information, response to question 2

234. The recruitment of a night time economy manager²³⁰ illustrates an innovative approach to the management of leisure related impacts. A casino development would assist achievement of several Tourism Development Strategy priorities which include developing the night time economy, reducing seasonality and pursuing development of innovative facilities.²³¹ There is synergy with the sizeable local conference activity.
235. There is evidence of market interest in a casino development.²³²
236. Among the community benefits (other than those already mentioned) to be expected from the licensing of the proposed casino would be new investment in the public realm, car park and transport facilities and education and counselling to combat problem gambling.²³³
237. The borough council retains strong cross party support for the proposal and public consultation continues.
238. While we have little doubt about the success of a large casino in Bournemouth, and appreciate the contribution it would make to the local tourism economy, we see this location as being not among the strongest as a test of social impact. Nor is the evidence indicative of the strongest regeneration needs when compared to others before us.

Brighton and Hove

About Brighton

239. Brighton, with its contiguous “other half” Hove, lies on the south coast of England between the South Downs and the sea. Brighton began as a seaside – and gambling – resort in the early nineteenth century under the patronage of the Prince Regent and grew rapidly with its fast rail connection to London. Although to some extent the resort has suffered from the problems of all cold water resorts, today the city is stated to receive a little over 8 million visitors a year of which 6.5 million are day visitors.²³⁴ There are currently approximately 6,000 hotel bedrooms and a further 800 are planned or under development.²³⁵ The city has a five star hotel,²³⁶ and is a large regional shopping centre.²³⁷

²³⁰ *Ibid.*, response to question 6

²³¹ *Ibid*

²³² *Proposal Document*, paragraph 5.9, Supplementary information. response to question 8

²³³ *Ibid.*, response to question 7

²³⁴ *Proposal Document*, paragraph 1.11

²³⁵ *Ibid.*, paragraph 1.15

²³⁶ Responses to Panel questions, p.5

²³⁷ *Ibid.*, p.1

240. For all of its apparent prosperity the City of Brighton and Hove is the 74th most deprived local authority area in England,²³⁸ lying in the third lowest 10 percentile band of multiple indices of deprivation.²³⁹ There is some evidence of deprivation in the city with income deprivation a particular factor²⁴⁰ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 79.6%, of whom 74.3% were in employment. Unemployment stood at 3.0% in October 2006 against a national average of 2.5%.²⁴¹
241. The city's people face challenges around skills, economic activity rates (see preceding paragraph) and, with GVA per capita below national and regional averages, long-term economic sustainability.²⁴²

The proposal

242. The proposal is for a large and/or a small casino. The Tourism Strategy for the city calls for carefully controlled, top quality casino development to support broader product development ambitions.²⁴³

Consultations and regional considerations

243. The South-East Plan specifically refers to Brighton and Hove as being within an area where particular focus is needed on economic and social regeneration.²⁴⁴ Other policies of the (currently) draft RSS for the South East aim to reduce regional and inter-regional economic disparities, diversify the economic base of coastal resorts and stimulate leisure development in town centres.²⁴⁵

Consideration

244. As a successful, popular and well established seaside resort, Brighton could obviously be a good place in which to test the impact of a casino.
245. The city council is quite sensibly addressing its “broader product development ambitions” to the end that its tourism economy is to remain strong. In this respect a casino development would have synergy with the existing significant conference activity, other well developed leisure activities and its seemingly thriving retailing economy. Proximity to Gatwick Airport and London²⁴⁶ would of course help the success of a casino in the city.

238 ODPM (2004) *Indices of Deprivation 2004*

239 *Ibid.* percentile bands of average score

240 *Proposal Document*, paragraph 3.2, responses to Panel questions, p.2

241 *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

242 Responses to Panel questions, p.2

243 *Proposal Document*, paragraph 5.1

244 *Ibid.*, paragraph 6.2

245 Responses to Panel questions, p.4

246 *Ibid.*, p.5

246. While the city undoubtedly has serious regeneration needs, comparative data suggests that they do not appear to be so acute as in other seaside resorts.
247. The city council was slow to confirm its willingness to license,²⁴⁷ but did so.²⁴⁸
248. While either a large casino or a small one, or both, would have a beneficial effect in sustaining the city's tourism enterprise, we do not rank this proposal as highly as other areas with greater regeneration needs.

Chelmsford

About Chelmsford

249. With a resident population of 161,100,²⁴⁹ Chelmsford is a predominantly affluent town²⁵⁰ within the London city region.²⁵¹ The borough is stated to attract 288,000 staying visitors and over 3.6 million day visitors a year.²⁵² It has a small proportion of its population from ethnic minorities.²⁵³ Chelmsford enjoys good rail links and is convenient (by road) for Stansted airport.²⁵⁴
250. The Borough of Chelmsford is the 321st most deprived local authority area in England,²⁵⁵ lying in the highest 10 percentile band of multiple indices of deprivation.²⁵⁶ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 84.7%, of whom 80.9% were in employment. Unemployment stood at 1.4% in October 2006 against a national average of 2.5%.²⁵⁷

The proposal

251. Unusually the first preference of this proposal is for a small casino, with a fall-back to a large one if the small is unacceptable. The small casino was chosen over the large for commercial considerations and so as not to dominate the town centre.²⁵⁸ Two locations are proposed; at Chelmer Waterside beside the town centre and at Great Leighs Showground to the north of the town where a new racecourse and a major leisure venue are being developed.²⁵⁹ The strategy "Celebrate Chelmsford" aims to maximise the economic and social benefits of tourism.²⁶⁰

247 *Ibid.*, p.2

248 Covering letter to *Proposal Document*

249 *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006)

250 *Proposal Document*, p.17

251 There is no official definition of the London City Region. Chelmsford is 48km by rail from London Liverpool Street

252 *Proposal Document*, p.5

253 *Ibid.*, p.2.

254 *Ibid.*, p.4

255 ODPM (2004) *Indices of Deprivation 2004*

256 *Ibid.* percentile bands of average score

257 *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

258 Response to Additional Questions, p.8

259 *Proposal Document*, p. 8 and Response to Additional Questions p.12

260 *Proposal Document*, p.10

Consultations and regional considerations

252. There is a supportive regional policy context in generic policies in the East of England RSS which expresses a need for diversification in the employment base of Chelmsford.²⁶¹

Consideration

253. As a medium sized town accessible to parts of the London catchment, Chelmsford could be a useful place in which to test social impact, though it would offer nothing special in this regard.
254. Regeneration needs that have been identified by the borough council relate to improving the local economy and making best use of available development sites.²⁶² A casino, whether small or large, in Chelmsford would, as we see it, be quite likely to benefit the economy, as we can see the synergies that would be created in either the town centre or the racecourse location. We note that Chelmsford lies in the least deprived decile of deprivation.
255. While public consultation was in progress, by September 2006 the Full Council had yet to support the proposal.²⁶³ To our mind, this does not indicate wholehearted local support.
256. Chelmsford would offer nothing special as regarding testing social impact. A casino in the town would be a useful addition and diversification to the town's economic portfolio. But in other respects we find the proposal less compelling than others.

Chesterfield

About Chesterfield

257. Chesterfield is a market town with a 2005 population of 100,000.²⁶⁴ It lies within the Sheffield city region²⁶⁵ set within a former coalmining area and located close to the Peak District National Park. Possibly because of this location, its proximity to a number of nationally known attractions or its famous twisted spire, the town is stated to receive 3.2 million visitors a year of whom 92% are day visitors. There are 1,000 bedspaces available locally.²⁶⁶
258. The Borough of Chesterfield is the 66th most deprived local authority area in England,²⁶⁷ lying in the second lowest 10 percentile band of multiple indices of deprivation.²⁶⁸ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 81.0%, of whom 74.6% were in employment.

²⁶¹ *Response to Additional Questions*, p.13

²⁶² *Response to Additional Questions*, p.8

²⁶³ *Ibid.*, p8

²⁶⁴ *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006)

²⁶⁵ Notwithstanding the town being in the East Midlands Region. *Proposal Document*, p.1

²⁶⁶ *Proposal Document*, p.2

²⁶⁷ *ODPM (2004) Indices of Deprivation 2004*

²⁶⁸ *Ibid.* percentile bands of average score

Unemployment stood at 3.2% in October 2006 against a national average of 2.5%.²⁶⁹ These figures and others are evidence of deprivation in Chesterfield with low pay and above average unemployment.²⁷⁰

The proposal

259. Chesterfield's first choice was a regional casino, but a large one is the fall back position. The proposal aims to incorporate a casino into an "edge of town" new build 121ha gated resort destination with extensive leisure and business facilities, including overnight accommodation for 2000 visitors.²⁷¹ A large casino would form the basis of a second phase of this development.²⁷²

Consultations and regional considerations

260. Chesterfield's proposal is strongly supported by the East Midlands Development Agency.²⁷³ The draft RSS for the East Midlands published in September 2006 encourages regeneration in the former Derbyshire/Nottinghamshire coalfield. New casinos should be located in this area.²⁷⁴ A local framework for the development of tourism is provided by the Economic Development Strategy for Chesterfield and North East Derbyshire (2005-2015).²⁷⁵

Consideration

261. Given that the remit of the Gambling Commission is to advise on social impact of the new casinos "no earlier than three years after the award of the first premises licence",²⁷⁶ we have doubts as to the utility of a "second phase" proposal in helping to test social impact.
262. This former coalfield town is undoubtedly in need of an economic boost, and the proposal, by building upon the town's manifest assets, would assist in its accomplishment. We see also that the borough council takes a responsible view of social impact.²⁷⁷
263. We note also that the borough council had not completed consultations on its proposal by November 2006 and had not yet reported to Full Council.²⁷⁸ While it may be that unequivocal willingness to license is in the offing, to our mind this is not evidence of this situation.
264. In the end, for the reasons apparent above, this has turned out not to be one of the strongest proposals we considered.

²⁶⁹ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

²⁷⁰ Proposal Document, p.2

²⁷¹ *Ibid.*, p.1

²⁷² Response to Additional Questions, response to question 5

²⁷³ Letter to CAP dated 27/06/2006

²⁷⁴ *Ibid.*, response to question 6

²⁷⁵ Proposal Document, p.2

²⁷⁶ Statement of National Policy (Annex A), paragraph 6

²⁷⁷ Response to Additional Questions, question 2

²⁷⁸ Response to Additional Questions, question 4

Dudley

About Dudley

265. With a 2005 resident population of 305,600, the Metropolitan Borough of Dudley, lying to the west of Birmingham, is an amalgamation of Black Country towns within the wider West Midlands conurbation. The borough is the 125th most deprived local authority area in England,²⁷⁹ lying in the fourth lowest 10 percentile band of multiple indices of deprivation.²⁸⁰ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 78.6%, of whom 76.8% were in employment. Unemployment stood at 3.6% in October 2006 against a national average of 2.5%.²⁸¹ Other indices of deprivation include low income levels and loss of people in higher (A/B) social groups.²⁸² Nevertheless, it has a tourist industry. The borough is stated to receive 400,000 overnight visitors and 4.4 million day visitors a year.²⁸³

The proposal

266. Dudley's preference was for a regional casino, with a fall back to a large or small one. Their preferred location within this large borough is at Brierley Hill, which, despite it containing the regional scale shopping centre at Merry Hill, is an area of acute deprivation²⁸⁴ and a Regeneration Partnership area.²⁸⁵

Consultations and regional considerations

267. In the draft RSS for the West Midlands submitted to the Secretary of State for Communities and Local Government in May 2006, Brierley Hill is proposed as one of four key strategic centres for the Black Country in which town centre uses, including leisure uses, will be promoted.²⁸⁶

Consideration

268. Other than that Brierley Hill has a substantially lower proportion of ethnic minority people than the national average,²⁸⁷ the location of this proposal would be a good example to test social impact in an inner city area.
269. While the entire borough does not suffer markedly in terms of deprivation, this is unfortunately untrue of Brierley Hill, where the casino is proposed. The proposal there is linked with a substantial amount of physical redevelopment²⁸⁸ in an area that is plainly in need of regeneration in all its aspects. Care, of course, would have to be taken as to siting.

²⁷⁹ ODPM (2004) *Indices of Deprivation 2004*

²⁸⁰ *Ibid.*, average score

²⁸¹ *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

²⁸² *Proposal Document*, p.2. paragraph 19.1

²⁸³ *Ibid.*, p.7

²⁸⁴ *Ibid.*

²⁸⁵ *Ibid.*

²⁸⁶ *Ibid.*, paragraph 26

²⁸⁷ *Ibid.*, paragraph 19.1, p.3. The percentage of BME in Brierley Hill is 5.96, compared with 11.74% in England

²⁸⁸ *Response to Additional Questions* paragraphs 2.1-2.5

270. From the evidence submitted,²⁸⁹ the borough council appears to us to have a responsible attitude to social questions, although they have yet to establish any institutional framework for dealing with problems but rather seem to depend upon a particular operator for guidance.
271. The council and developers have in hand a training project “Future Skills Dudley” which together with links to local colleges are designed to bring construction and operational jobs to local people. The development company are said to have a good track record in this regard.²⁹⁰
272. As to willingness to license, there is cross party support in the council for a regional large or a small casino at Brierley Hill.²⁹¹
273. This could be quite a good proposal, particularly as regards the need to improve conditions at Brierley Hill, but we found that it failed to demonstrate full potential as regards social aspects and bringing hard to reach groups into jobs.

Dumfries and Galloway

About Dumfries and Galloway

274. Dumfries and Galloway is a vast district covering an area of over 62,000km² (24,000 sq, miles)²⁹² extending from the border with England westward along the Solway coast. It has a 2005 residential population of 148,300²⁹³ living in rural areas and small towns. It is an area that people pass through. Northern Ireland is only a short sea crossing away²⁹⁴ from high speed ferry terminals at Stranraer and Cairnryan, which are connected by trunk road and rail to Glasgow and Carlisle.²⁹⁵
275. Dumfries and Galloway is the 24th most deprived local authority area in Scotland,²⁹⁶ lying in the second lowest 10 percentile band of multiple indices of deprivation.²⁹⁷ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 82.3%, of whom 79.1% were in employment. Unemployment stood at 2.5% in October 2006 against a national²⁹⁸ average of 2.5%.²⁹⁹ There is evidence of rural deprivation. The whole district has a low wage economy with incomes lagging 12% behind the Scottish average. Incomes in Stranraer lag 19% behind.³⁰⁰

²⁸⁹ Response to Additional Questions paragraphs 2.6-2.8

²⁹⁰ *Ibid.*, paragraph 6.4

²⁹¹ *Ibid.* paragraph 4.1

²⁹² Proposal Document, paragraph 1.1

²⁹³ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006)

²⁹⁴ Proposal Document, paragraph 6.1.1

²⁹⁵ A replacement railway station at Stranraer has recently been approved. Recent Developments Document, August 2006 p.3

²⁹⁶ Scottish Economic Statistics www.scotland.gov.uk/stats/ses/ses/ accessed 20/10/2006

²⁹⁷ *Ibid.* percentile bands of average score

²⁹⁸ Great Britain

²⁹⁹ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

³⁰⁰ Proposal Document, paragraph 1.4, Further Information dated September 2006, p.2

The proposal

276. The proposal is for a large or a small casino to be situated in the area of Stranraer Waterfront which is being redeveloped from a commercial port to a marine and leisure destination. The Economic Development Strategy for the area identifies the Stranraer Waterfront as a strategic regeneration project realising the evolution from port to marine and leisure destination.³⁰¹

Consultations

277. Neither the Scottish Executive nor Scottish Enterprise have given a view on expressly this proposal.

Consideration

278. We agree with the council that a casino development at Stranraer would offer a useful test of social impact in the context of the transformation of a port to a resort.
279. The council is currently working with service providers with a view to developing a policy for dealing with negative social impacts. Dumfries and Galloway College at its Stranraer Campus is willing to develop specialist training for casino operation.³⁰²
280. Dumfries and Galloway is stated to receive over 1 million tourist visitors a year,³⁰³ tourism is identified as important to the future of the area, and a themed towns approach is being developed.³⁰⁴ We agree that a casino at Stranraer would boost the aim of this strategy. Operator market interest would tend to support the hypothesis that a casino at Stranraer would attract custom from Northern Ireland, and in that respect it is a particularly interesting opportunity to test the potential for attracting casino tourism from there, albeit that we consider that the catchment and the regeneration benefits to be realised would probably be more appropriate for a small rather than a large casino.
281. There is some local opposition to the proposal on the basis of fundamental opposition to gambling, but Dumfries and Galloway Licensing Board supports the proposal and the Council's Planning and Environmental Services Committee is likely to follow.³⁰⁵
282. The proposal has merit in offering a useful location for the test of social impact and assisting in a valuable programme of economic regeneration and urban redevelopment. We believe that a small casino would be more viable than a large one.

301 Dumfries and Galloway Local Economic Forum (2004) the Five Year Development Strategy for Dumfries and Galloway 2003-228, p. 28

302 *Ibid.*, p.2

303 *Proposal Document*, paragraph 1.2

304 Further Information dated September 2006, p.4

305 *Proposal Document*, paragraph 4.1.1. In Scotland, the relevant licensing authority is the Licensing Board

East Lindsey

About East Lindsey

283. East Lindsey covers a large area in the east of Lincolnshire including a long stretch of the coast. In 2005, the district had a population of 137,400.³⁰⁶ Taken as a whole, East Lindsey is the 78th most deprived local authority area in England,³⁰⁷ lying in the third lowest 10 percentile band of multiple indices of deprivation.³⁰⁸ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 78.5%, of whom 75.6% were in employment. Unemployment stood at 2.2% in October 2006 against a national average of 2.5%.³⁰⁹
284. The Coastal Action Zone, that is the coastal area from Mablethorpe in the north to Skegness in the south, with a population of 60,000,³¹⁰ suffers from extreme seasonality of employment³¹¹ and exhibits a range of significant deprivation indicators, not least low skill and activity levels.³¹² Fifteen wards in this zone are within the 20% most deprived and five are within the 10% most deprived in England.³¹³ Poverty and deprivation associated with worklessness has been identified as the critical problem facing residents.³¹⁴

The proposal

285. The proposal as envisaged by the council is a small casino with associated restaurants and bars and a four-star hotel. A number of coastal sites would be considered, at Skegness, to the north, including Butlins, and at Mablethorpe. The aim would be to reduce the local extreme economic seasonality.

Consultations and regional considerations

286. The East Midlands Development Agency regard East Lindsey as an ideal test bed for a small casino. The current draft RSS for the East Midlands, submitted to the Secretary of State for Communities in September 2006, does not have specific proposals for casinos but makes frequent references to the need to overcome severe deprivation in Skegness and Mablethorpe.³¹⁵

³⁰⁶ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006)

³⁰⁷ ODPM (2004) *Indices of Deprivation 2004*

³⁰⁸ *Ibid*, average score

³⁰⁹ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

³¹⁰ *Proposal Document*, p.2.

³¹¹ *Proposal Document*, p.8

³¹² *Ibid*.

³¹³ *Ibid*

³¹⁴ *Proposal Document*, p.5

³¹⁵ *Proposal Document*, p.18

Consideration

287. The small towns of the Lincolnshire coast, because they are small, would make good sites for the testing of social impact among the local population, though impact among visitors would be hard to trace.
288. The council is currently working with Gamcare and others in order to develop best practice programmes to manage any social ills that the casino might create.³¹⁶
289. While over 6 million visitors are attracted to the area each year, there are nearly 60,000 bedspaces in the Coastal Action Zone, over half of which are in static caravans and less than 10% of the accommodation is in hotels.³¹⁷ Taking this situation together with the seasonality problem, we agree that the development of a casino with hotel would be beneficial, and likely to be implemented, given the interest of existing holiday operators in the area³¹⁸ as well as prospective operators.³¹⁹ A range of potential sites has been identified.³²⁰
290. The regional context is favourable and there is a strong local position regarding willingness to license, with a favourable council resolution made in March 2006 following local consultation.³²¹
291. Without doubt the coastal towns of East Lindsey have all the problems of small cold water resorts, but they would make good sites for the test of social impact. We are impressed with the council's careful plans for using a small casino to assist in – not create – regeneration. This is altogether a good proposal.

Great Yarmouth*About Great Yarmouth*

292. Great Yarmouth is a town of 92,500 residents³²² situated on the east coast of Norfolk. Originally a port and fishing village, it grew with rail connections in the mid nineteenth century into a seaside resort peaking in visitor numbers in the late 1970s. Since then, like most cold-water resorts, its tourist trade has fallen off. It is now at a steady but low level³²³. There is a sizeable stock of 2,500 bedspaces in 120 hotels rated up to three stars,³²⁴ but no higher.
293. The Borough of Great Yarmouth is the 71st most deprived local authority area in England,³²⁵ lying in the second lowest 10 percentile band of multiple indices of deprivation.³²⁶ The proportion of economically active in the population of working age in the period

³¹⁶ *Supplementary Information August 2006*, p.2

³¹⁷ *Proposal Document*, p.3

³¹⁸ *Ibid.*, pp.15-17

³¹⁹ *Supplementary Information August 2006*, p.4

³²⁰ *Ibid.*, p.4

³²¹ *Proposal Document*, p.9

³²² *NOMIS data for 2005* (www.nomisweb.co.uk, accessed 22/11/2006)

³²³ Visitor numbers which peaked in the late 1970s and early 1980s amounted to almost 12 million visitor nights (mvn) annually but fell to 5mvn four years ago. Response to Supplementary Questions p.1

³²⁴ *Proposal Document*, paragraph 1.6

³²⁵ ODPM (2004) *Indices of Deprivation 2004*

³²⁶ *Ibid.* percentile bands of average score

April 2005 – March 2006 was 79.8%, of whom 70.0% were in employment. Unemployment stood at 4.3% in October 2006 against a national average of 2.5%.³²⁷ Much employment is seasonal and unemployment levels can be as high as anywhere in the UK.³²⁸ Average earnings are low³²⁹ and educational attainment is poor.³³⁰ Great Yarmouth has the highest rate of claimant unemployed amongst 43 principal seaside towns.³³¹

The proposal

294. As a fall back from an unsuccessful regional casino bid, either a large casino and/or one or two small one(s) is now proposed as congruous with the development of the overall tourism and hotel offer in accordance with a draft “Tourism Strategy for Great Yarmouth”.³³² The preferred location is in the town’s “Pleasure Beach Complex”.³³³ Given our remit to provide a good geographical spread, we are of the opinion that only one casino should be considered in Great Yarmouth.

Consultations and regional considerations

295. The East of England Regional Assembly endorsed the original bid for a regional casino, referring it to the EiP of RSS. However, the EiP Panel Report in June 2006 did not consider it to be the role of the EiP to establish priority at one particular location rather than another.³³⁴ The plan does however identify the borough as a priority area for regeneration.³³⁵
296. The East of England Development Agency made its preference clear for a regional casino, preferring the proposal from Southend.³³⁶ (However Southend did not wish to be considered for a large or a small casino).

Consideration

297. Although the resident ethnic minority population is well below the national average,³³⁷ Great Yarmouth would be a useful place in which to test social impact among the resident population. Tracing visitors, however, would not be so easy.
298. As to social impact, the council appears to have studied carefully the present situation (the town already has two casinos) and is preparing itself for another, larger casino in collaboration with, but not determined by, potential operators. While the council has made estimates of jobs to be created, we would have liked to see more as to how hard to reach groups could be fitted into them.

³²⁷ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

³²⁸ Proposal Document, paragraph 1.11

³²⁹ *ibid.*, paragraph 1.19

³³⁰ *ibid.*, paragraph 1.20

³³¹ Sheffield Hallam University (2003) The Seaside Economy quoted in Proposal Document, paragraph 13.8

³³² Proposal Document, paragraph 1.20

³³³ Response to Supplementary Questions p.6

³³⁴ Response to Supplementary Questions p.6

³³⁵ Proposal Document, paragraph 3.6

³³⁶ Letter of 23 December 2005 to the CAP

³³⁷ Resident BME population is 3% compared with a national average of 7.9% – Proposal Document, paragraph 1.5

299. Undoubtedly the town is in need of regeneration, and the approach of the borough council, that a casino would assist regeneration rather than reversing tourism fortunes,³³⁸ is encouraging. Casino development would be consistent with the local aspiration to stretch the very seasonal tourism offer to become all year round.³³⁹
300. There is some evidence of market interest³⁴⁰ and we have no doubts about willingness to license.³⁴¹
301. Noting that we are of the opinion that we should not consider more than one casino in Great Yarmouth, we conclude that despite the mixed regional support, and taking all the above together, this is a generally good bid for a large casino.

Hastings

About Hastings

302. Situated on the south coast of England, the Borough of Hastings includes both the town of Hastings and also St Leonards on Sea. The borough has a resident population in 2005 of 86,400. Like so many cold-water resorts, the borough has suffered severely from a downturn in domestic tourism. Hastings suffers through being over an hour and a half by rail from London³⁴² and through inadequate road links.
303. Today, the town exhibits considerable deprivation with high levels of economic inactivity and wage levels are low.³⁴³ The Borough of Hastings is the 39th most deprived local authority area in England,³⁴⁴ lying in the second lowest 10 percentile band of multiple indices of deprivation.³⁴⁵ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 74.4%, of whom 71.2% were in employment. Unemployment stood at 3.7% in October 2006 against a national average of 2.5%.³⁴⁶
304. Tourism remains important to Hastings and surrounding settlements with a stated 1.1 million staying visitors a year and 8.5 million day visitors.³⁴⁷ The pressing need for regeneration in the borough is illustrated by the closure of several of its premier tourist assets including Hastings Pier, White Rock Baths and St Leonards Lido.³⁴⁸

The proposal

305. The proposal is for a small casino which could be located in either a seafront, town centre or other location except for a residential area.³⁴⁹

³³⁸ Response to Supplementary Questions p.1

³³⁹ Proposal Document, paragraph 1.11

³⁴⁰ Response to Supplementary Questions p.5

³⁴¹ Proposal Document, paragraph 4.1, Additional Information paragraph 2(ii)

³⁴² Compare service London to Brighton at 50 minutes

³⁴³ Supplementary Submission paragraph 1.2

³⁴⁴ ODPM (2004) Indices of Deprivation 2004

³⁴⁵ *Ibid.* percentile bands of average score

³⁴⁶ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

³⁴⁷ Proposal Document, paragraph 1.3

³⁴⁸ Supplementary Submission paragraphs 2.1 – 2.4

³⁴⁹ *Ibid.*, paragraph 5.2

Consultations and regional considerations

306. Although the current draft regional spatial strategy for the South East Region makes no specific reference to Hastings as the location of a casino, it says that the tourism priority is to upgrade, diversify, reduce seasonality and improve access in the coastal belt that includes Hastings.³⁵⁰

Consideration

307. A modest sized borough town, relatively isolated from other urban development, Hastings would make quite a good place in which to test social impact in an area in desperate need of regeneration. Tracing visitors, however, would be problematical.
308. The approach of the borough council to training is commendable, but we see in their proposal little that impresses us as to real understanding of social problems, nor in bringing hard to reach groups into employment.
309. Approaches by potential operators suggest some evidence of market interest,³⁵¹ but it is not obvious to us, given our understanding of the market conditions, that a new casino would be so viable as to bring about regeneration benefits comparable with some other places.
310. The regional policy context however is favourable and we see no problems regarding willingness to license.
311. Hastings is without doubt one of the places in Britain in most need of regeneration. This proposal is not without its merits, but compared with others falls short in too many aspects.

Kingston-upon-Hull*About Kingston-upon-Hull*

312. The city of Kingston-upon-Hull is situated in the south east of Yorkshire at the mouth of the Humber. With a 2005 population of 249,100³⁵² and a travel-to-work area population of 419 000,³⁵³ it is an important gateway port. But Hull is one of the most severely deprived communities in England. It is the 11th most deprived local authority area in England,³⁵⁴ lying in the very lowest 10 percentile band of multiple indices of deprivation.³⁵⁵ and with almost half of its area falling into the 10% most deprived category in 2004.³⁵⁶ The proportion of economically active in the population of working

³⁵⁰ *Ibid*, paragraph 6.1, Letter dated 26 June 2006 from the South East Regional Assembly to the CAP

³⁵¹ *Proposal Document*, paragraph 5.1

³⁵² *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006)

³⁵³ *Proposal Document*, Probability of Implementation p.1

³⁵⁴ ODPM (2004) *Indices of Deprivation 2004*.

³⁵⁵ *Ibid*. percentile bands of average score

³⁵⁶ *Proposal Document*, Executive Summary, p.1

age in the period April 2005 – March 2006 was 71.1%, of whom 66.7% were in employment. Unemployment stood at 5.4% in October 2006 against a national average of 2.5%.³⁵⁷ Not only is unemployment high but skill levels are low.³⁵⁸

313. Hull does, however, have a tourist industry which the council wants to develop, building on its local attractions and its function as a ferry port to the Continent.³⁵⁹ The area is stated to have over 5 million tourist visitors a year of which 75% are day visits.³⁶⁰ There are 1,900 bedspaces in the wider area but there is a lack of four or five star accommodation and conference/exhibition facilities which limits the opportunity to develop business tourism.³⁶¹ An organisation “Hull CityBuild” sponsored by the City Council, the Regional Development Agency and English Partnerships has the aim of bringing investment into the urban regeneration of Hull.³⁶²

The proposal

314. This proposal for a large casino is presented as a fall-back from an unsuccessful bid for a regional casino. The council has identified two strategic development areas in the city centre as suitable for a large casino.³⁶³

Consultations and regional considerations

315. The draft RSS for Yorkshire and the Humber supports Hull as an appropriate location for a large casino.³⁶⁴

Consideration

316. Notwithstanding the fact that the proportion of people with an ethnic minority background is much lower than the English average,³⁶⁵ this location offers a good opportunity to test the social impact of a large casino development in a port that is experiencing severe deprivation.
317. The council recognises the need to train people in the most deprived wards so that they can take up jobs offered³⁶⁶ and appears to be preparing itself well to deal with any social problems that might arise.³⁶⁷
318. The council recognises that the proposal would not act as a panacea for all the city's socio-economic problems, but would act as the anchor tenant in a city centre regeneration, offering the opportunity for hotel and conference centre developments.³⁶⁸

³⁵⁷ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

³⁵⁸ Proposal Document, Executive Summary, p.1

³⁵⁹ Proposal Document, Executive Summary, p.2

³⁶⁰ Proposal Document, Strategic Overview, p.2.0

³⁶¹ Proposal Document, Strategic Overview, p.2

³⁶² Proposal Document, Strategic Overview, p.2

³⁶³ Supplementary Document, September 2006, p.2

³⁶⁴ Proposal Document, Regional and Local Policy Context, p.1. The draft RSS was examined in public in September and October 2006

³⁶⁵ 2.32% c.f.8.69% Census 2001 quoted in Proposal Document, Strategic Overview, p.2

³⁶⁶ Proposal Document, Social Impact, p.1

³⁶⁷ Ibid. pp.1 & 2

³⁶⁸ Additional Information, p.1

319. A large casino in Hull would be able to draw custom not only from the city and its hinterland, but much of industrial Yorkshire thanks to good motorway access, There appears also to be serious interest from a potential operator³⁶⁹ and so we have no doubts about the viability of the proposal.
320. The regional policy context in respect of a large casino development in Hull is favourable,³⁷⁰ and as to willingness to license, we note widespread support for a regional casino and the commitment of the city council.³⁷¹
321. Hull offers a good opportunity to test the social impact of a large casino; the council appears to be preparing itself well to deal with social problems. Although the council recognises that their proposal would not solve all the city's problems, it appears a sound one in almost every respect.

Leeds

About Leeds

322. Situated centrally in industrial west Yorkshire, the city of Leeds has a 2005 resident population of 723,100.³⁷² Together with the adjacent or nearby urban areas including the metropolitan cities and boroughs of Bradford, Calderdale, Kirklees and Wakefield it is part of a conurbation of well over 2 million people³⁷³ for which Leeds is a major employment provider.³⁷⁴ The city has a largely service based economy.³⁷⁵ It has access to an impressive transport infrastructure; in addition to good road connectivity Leeds enjoys well developed rail, coach and bus connections.³⁷⁶
323. Nevertheless, the city as a whole is the 91st most deprived local authority area in England,³⁷⁷ lying in the third lowest 10 percentile band of multiple indices of deprivation.³⁷⁸ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 79.8%, of whom 74.6% were in employment. Unemployment stood at 3.0% in October 2006 against a national average of 2.5%.³⁷⁹ Substantial parts of the city are included within the most deprived areas nationally,³⁸⁰ suffering multiple problems including high unemployment and low income.³⁸¹

369 *Proposal Document, Probability of Implementation, p.2*

370 *Ibid, Regional and Local Policy Context, p.1*

371 *Ibid, Willingness to Licence, p.1, Letter to the CAP dated 29 September 2006 from Cllr Andy Sloan*

372 *NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006)*

373 *NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006)*

374 *Proposal Document, p.3*

375 *Ibid., p.3*

376 *Ibid., p.3*

377 *ODPM (2004) Indices of Deprivation 2004*

378 *Ibid. percentile bands of average score*

379 *NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population*

380 *Proposal Document, p.8*

381 *Ibid., p.4*

The proposal

324. With their first preference a regional casino, which proposal we have not endorsed, a large casino is now the subject of consideration. Three sites are proposed, at Holbeck Urban Village, in the Aire Valley and at Elland Road. All are in or near to areas of severe deprivation.³⁸²

Consultations

325. The draft RSS published in December 2005 proposed either Sheffield or Leeds as the location for the regional casino. The draft was examined in public in September and October 2006.³⁸³

Consideration

326. With a good mixture of rich and poor in its area, and an ethnic minority proportion³⁸⁴ close to the national average, Leeds could be regarded as fairly typical of urban Britain. The size and busy-ness of the city might, however, present a challenge for a researcher to distinguish casino related impacts from others.
327. The city council has five existing casinos in its area³⁸⁵ and, building on its experience in this field, intends to establish a social inclusion fund to tackle a range of social problems including indebtedness, while promoting both training and pre-employment training skills.³⁸⁶ A Casino Task Group made up of key stakeholders has been established.³⁸⁷
328. Leeds is (with Manchester, Newcastle and Sheffield) one of eight cities in the Northern Way which are seen as key to the economic progress of the North (see footnote 196). Although Leeds is a more prosperous city than many in the north of England, it does not lack areas of acute deprivation, so we are pleased to note the council's commitment to an on-going programme to promote financial inclusion and tackle indebtedness.³⁸⁸ We expect, therefore, that care will be taken in siting and design in due course.
329. A large casino development would contribute to the local vision for tourism which seeks to expand leisure tourism by building on the existing business tourism base.³⁸⁹
330. The regional policy context is favourable³⁹⁰ and there is good evidence of market interest.³⁹¹
331. There is all-party support on the city council for the proposal.³⁹²
332. This is a well prepared proposal in an area that is fairly typical of urban Britain in having areas of deprivation among an otherwise well-to-do community.

³⁸² *Ibid.*, map at p.5 and p.8, so that case will have to be taken in siting and design

³⁸³ Yorkshire and the Humber EiP Statement, August 2006

³⁸⁴ 8.5% derived from Census 2001. Response to Additional Questions p.2

³⁸⁵ *Proposal Document*, p.16

³⁸⁶ *Ibid.*, p.12, Response to Additional Questions p.1

³⁸⁷ Response to Additional Questions p.7

³⁸⁸ *Ibid.* p.1

³⁸⁹ *Proposal Document*, p.4

³⁹⁰ *Ibid.*, p.7

³⁹¹ Response to Additional Questions p.5

³⁹² Supplementary Information, p.3

Leicester

About Leicester

333. The city of Leicester, along with Derby and Nottingham, is at the core of the East Midlands. It has good rail, road and air links and transport links to the East Midlands Airport are being strengthened.³⁹³ Traditionally the seat of textile and knitwear industries, the decline of these industries in the 1980s hit the city hard, leading to social deprivation and urban dereliction. Today Leicester is a diverse city with an outstandingly high ethnic minority representation³⁹⁴ among its 2005 population of 288,000.³⁹⁵ The city has strong ties to Asian economies.³⁹⁶
334. Leicester is the 29th most deprived local authority area in England,³⁹⁷ lying in the very lowest 10 percentile band of multiple indices of deprivation.³⁹⁸ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 71.7%, of whom 68.0% were in employment. Unemployment stood at 4.7% in October 2006 against a national average of 2.5%.³⁹⁹ There are several areas of deprivation including inner areas and outer estates exhibiting high levels of unemployment.⁴⁰⁰ Average earnings and economic activity rates are low.⁴⁰¹ While Leicester has a long-established and very prosperous middle class of Asian origin, deprivation is found mainly among newly arrived communities and in the unskilled white working class on the outer estates.⁴⁰²

The proposal

335. The proposal is for a large casino, to be situated in the city's proposed New Business Quarter at Humberstone Gate, where it is hoped it will both broaden the attraction of the city centre to its working (daytime) population⁴⁰³ and also lead to the development of a four-star hotel and a conference centre.⁴⁰⁴

Consultations and regional considerations

336. The proposal is supported by the East Midlands Development Agency.⁴⁰⁵ Support for the proposal is also implicit in the draft RSS for the East Midlands,⁴⁰⁶ published in September 2006 and which is due to be examined in public in May and June 2007.

³⁹³ *Proposal Document*, p.2

³⁹⁴ 36.28% c.f. average for England of 9.8%. Census 2001, *Proposal Document*, p.2. Note that the dataset used (KS06) is that given in the proposal

³⁹⁵ *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006)

³⁹⁶ Additional submissions, August 2006, p.6

³⁹⁷ ODPM (2004) *Indices of Deprivation 2004*

³⁹⁸ *Ibid.* percentile bands of average score

³⁹⁹ The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

⁴⁰⁰ Response to Additional Questions, p.3.

⁴⁰¹ *Proposal Document*, p.3

⁴⁰² Response to Additional Questions, p.3

⁴⁰³ *Proposal Document*, p.11

⁴⁰⁴ Response to Additional Questions, p.7, Additional Submission, p.3

⁴⁰⁵ *Proposal Document*, p.18. Letter to CAP dated 27/06/2006

⁴⁰⁶ *Proposal Document*, p.19

Consideration

337. This location offers the opportunity to test the social impact of a large casino development in a richly diverse community.
338. There is evidence of existing gambling problems in Leicester⁴⁰⁷ which leads the council to propose targeted programmes of support for them in particular and for the most deprived communities in general.⁴⁰⁸
339. Casino-led development would be consistent with the city growth strategy and the regional policy context is supportive.⁴⁰⁹ There is evidence of some market interest in the redevelopment of the Humberstone Gate area, which would be enhanced by the development of a casino.⁴¹⁰
340. There are reservations, particularly among faith communities, about the effect a large casino might have on the city.⁴¹¹ Although the executive body of the council supports the proposal, it has not been before Full Council because it would be “treated as a political football”.⁴¹²
341. This would be a useful place in which to test social impact in an area with a very large minority ethnic population, but the focus seems mostly on the advantages of the casino in promoting city centre property redevelopment rather than regeneration in the round. The evidence on willingness to license is not encouraging.

Luton*About Luton*

342. The Borough of Luton is a major retail and employment centre to the north of the Chiltern Hills. The borough has a 2005 resident population of 184,900.⁴¹³ In the last century Luton grew as a major centre of motor vehicle production, but this has now gone, leaving the town with a legacy of social problems, pockets of deprivation and derelict land.⁴¹⁴ The borough has a diverse population with very high ethnic minority representation.⁴¹⁵
343. Luton is the 103rd most deprived local authority area in England,⁴¹⁶ lying in the third lowest 10 percentile band of multiple indices of deprivation.⁴¹⁷ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 73.3%, of whom 67.7% were in employment. Unemployment stood at 3.6% in October 2006 against a national average of 2.5%.⁴¹⁸

407 *Proposal Document*, p.10

408 *Response to Additional Questions*, pp.4 & 10

409 *Additional submissions*, August 2006, p.5

410 *Additional submissions*, August 2006, p.3

411 *Proposal Document*, p.9

412 *Response to Additional Questions*, p.8

413 *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006)

414 *Proposal Document*, pp.3 & 11

415 *Proposal Document*, p.1. Census 2001 (KS06) gives the ethnic minority proportion in Luton as 28.37%. C.f. England average 9.08% (<http://www.statistics.gov.uk/StatBase/Expodata/Spreadsheets/D8296.xls>), accessed 20/11/2006)

416 ODPM (2004) *Indices of Deprivation 2004*

417 *Ibid.* percentile bands of average score

418 *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

The proposal

344. The proposal draws attention to the opportunity to develop a large or a small casino in Napier Park, that is the site of the former Vauxhall Motors plant that closed in 2002.⁴¹⁹ Consideration is here being given to a large casino.

Consultations and regional considerations

345. Approved Regional Planning Guidance for the South East (of England) (RPG9) identifies the Luton/Dunstable/Houghton Regis sub-region as a Priority Area for Economic Regeneration,⁴²⁰ and this policy is continued in the draft RSS for the East of England, examined in public in January-March 2006.⁴²¹

Consideration

346. Luton, having a large ethnic minority population and acute economic regeneration needs, appears to be a useful place in which to test social impact.
347. Progress has been made in preparing to implement mechanisms to deal with issues of social impact including a Community Casino Group and Fund.⁴²² Consultation with all ethnic minority community groups will be undertaken before the precise location of the casino will be selected, ensuring among other things, that good public transport links are available to the areas of greatest unemployment.⁴²³
348. Despite the fact that the casino may not end up being developed on the old Vauxhall site, nevertheless we have found exciting the emergence of a proposal for redevelopment of that site and the ability of a casino to lead it.
349. The council is keen to convert the perceived image of Luton from a place to pass through to a place to stay⁴²⁴ and a casino development would be consistent with this and other local ambitions. A significant proportion of visitors to Luton are likely to be airport related.⁴²⁵ Luton Airport operates at over 10 million passengers a year⁴²⁶ with some 40% of arrivals on outbound journeys.⁴²⁷ While the council is realistic enough not to imagine that people would come from overseas into Luton just to play at the casino, it would help local business if they could find a reason to stay. Currently there are 1,700 three star or less rated hotel bedspaces and it is hoped that the arrival of a four or five star hotel together with the casino would not only help the economy, but the business of the airport also.⁴²⁸

419 *Proposal Document*, p.11

420 RPG9, Map 5, et alibi

421 *Proposal Document*, pp 10 & 17

422 Response to Additional Questions p.2

423 Response to Additional Questions p.5

424 *Proposal Document*, p.2

425 *Proposal Document*, p.3

426 Response to Additional Questions p.11, *Proposal Document*, p.3

427 Response to Additional Questions p.11

428 Response to Additional Questions pp 9 & 11, *Proposal Document*, p.3

350. The casino proposal appears to be consistent with the regional policy context in which Luton is identified as a priority area for economic regeneration.⁴²⁹
351. There is some evidence of market interest.⁴³⁰
352. While the council has yet to put the proposal before full council, it does nevertheless have all-party support.⁴³¹
353. This is an area with immediate economic regeneration needs that would usefully act as a test of social impact in an area with a very high proportion of people from ethnic minorities.

Mansfield

About Mansfield

354. The Borough of Mansfield, on the borders of Sherwood Forest in north Nottinghamshire has a 2005 resident population of 99,000,⁴³² and is the sub-regional centre for a travel to work area of around 370,000.⁴³³ Having grown from a market town in the last two centuries as a coal, brewing and textile town, it has now lost all those industries, and is the 32nd most deprived local authority area in England,⁴³⁴ lying in the very lowest 10 percentile band of multiple indices of deprivation.⁴³⁵ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 75.2%, of whom 65.8% were in employment. Unemployment stood at 2.5% in October 2006 against a national average of 2.5%.⁴³⁶
355. The initial response to the decline of traditional industries was to invest heavily in the development of the town's economic and transport infrastructure, leading to the development and redevelopment of a number of sites. More recently, the council has aimed at developing knowledge based and service industries, with tourism a priority.⁴³⁷

The proposal

356. The proposal for a large casino, or a small casino as a fallback, would add to the attraction of Mansfield as a place both to visit and have a night out.⁴³⁸ Sites in the town centre are under consideration.⁴³⁹

⁴²⁹ Proposal Document, p.10

⁴³⁰ Response to Additional Questions p.9

⁴³¹ Response to Additional Questions p.10, letter from Cllr. David Johnston dated 27 September 2006

⁴³² NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006)

⁴³³ Proposal Document, p.2

⁴³⁴ ODPM (2004) *Indices of Deprivation 2004*

⁴³⁵ *Ibid.* percentile bands of average score

⁴³⁶ The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

⁴³⁷ Proposal Document, p.2

⁴³⁸ Proposal Document, p.7

⁴³⁹ Further Supporting Evidence, p.1

Consultations and regional considerations

357. The proposal is supported by the East Midlands Regional Assembly who draw attention to the aim in the draft East Midlands RSS to strengthen sub-regional centres in the former coalfield.⁴⁴⁰ The proposal is also supported by East Midlands Development Agency on the basis of Mansfield being a priority for economic renewal.⁴⁴¹

Consideration

358. Mansfield might be a useful example of a decayed industrial town in which to test social impact.
359. Regeneration needs are undoubtedly acute in Mansfield, and the proposal would bring to the area some useful employment. The council has Local Enterprise Growth Initiative funding to provide outreach work in disadvantaged neighbourhoods in order to bring long term unemployed into work.
360. Mansfield town centre currently attracts 10,000 mainly young people on Friday and Saturday nights. A casino, by attracting more older people, would help balance the age composition of the night-time population.⁴⁴² The extensive journey to work catchment and the fact that over a million people live within a 30 minute drive time suggest the viability of a casino.⁴⁴³ However, little evidence was presented of a relevant tourism strategy for tourism development and the place that a casino would fit into it.
361. The proposal has the support of Full Council following local consultation, indicating, to our mind, willingness to license.
362. We have decided that other proposals have more merit in regard to a large casino. However while there are acute regeneration needs in Mansfield, even the proposal for a small casino is in some respects not as strong as others before us.

Middlesbrough*About Middlesbrough*

363. The Borough of Middlesbrough, situated on the estuary of the River Tees is noted as the birthplace of Captain Cook. As an iron and steel town it is noted for being the first to use the Bessemer process for steel making in 1879.⁴⁴⁴ It also developed as a port for the export of coal. Being in the Tees Valley, Middlesbrough is also adjacent to major chemical industries. The current (2005) population of the borough is 137,000.⁴⁴⁵ With other contiguous and nearby towns it forms a conurbation of 651,000,⁴⁴⁶ the "Tees Valley City". A regeneration company is assisting in the delivery of a number of important development projects in the Tees Valley.⁴⁴⁷

⁴⁴⁰ Letter dated 22/6/2006 from EMRA to CAP. Draft RSS was submitted in September 2006 and will be examined in public in May-June 2006

⁴⁴¹ Letter to CAP dated 27/06/2006

⁴⁴² Response to Additional Questions, p.4

⁴⁴³ Response to Additional Questions, p.3

⁴⁴⁴ www.spartacus.schoolnet.co.uk/ITmiddlesbrough.htm, accessed 29/6/2006

⁴⁴⁵ *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006)

⁴⁴⁶ *Proposal Document*, p.4

⁴⁴⁷ *Ibid*, p.11

364. However, with its former economic role gone, Middlesbrough suffers from considerable levels of deprivation⁴⁴⁸ including high levels of unemployment.⁴⁴⁹ Currently the borough is the 19th most deprived local authority area in England,⁴⁵⁰ lying in the very lowest 10 percentile band of multiple indices of deprivation.⁴⁵¹ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 73.8%, of whom 68.1% were in employment. Unemployment stood at 4.9% in October 2006 against a national average of 2.5%.⁴⁵²

The proposal

365. Following the lack of success of a proposal for a regional casino, a large casino is now being considered as a fall-back, as requested. The proposed regional casino was seen as assisting in the redevelopment of the former dock area of Middlehaven,⁴⁵³ but there would be a wider selection of sites in and around the town centre for a large casino.⁴⁵⁴

Consultations

366. The proposal is supported by both the North East Assembly⁴⁵⁵ and by “ONE NorthEast”, the regional development agency for the North East Region.⁴⁵⁶

Consideration

367. With an ethnic composition not too far from the national average⁴⁵⁷ and representative of a former industrial area in the course of restructuring, Middlesbrough could be a useful site for the testing of social impact.

368. Although one or more of the sites proposed would put the casino close to further and higher education campuses, consultation with the institutions concerned indicates that no problems are likely to arise.⁴⁵⁸ The council is of the view that casinos need to be located in areas needing regeneration and that their social effects will be no worse than anywhere else. The proposal would be supported by targeted investment in training.⁴⁵⁹ The council has undertaken research into problem gambling in the borough, which, while somewhat inconclusive, has led them to develop a partnership with Gamcare and the Citizens’ Advice Bureau.⁴⁶⁰

448 *Ibid*, p.3

449 *Ibid*, p.4

450 ODPM (2004) *Indices of Deprivation 2004*

451 *Ibid*. percentile bands of average score

452 *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

453 *Ibid*, pp.11 & 12

454 Response to Additional Questions, response to Q2

455 Letter to CAP dated 28/12/2005

456 Letter to CAP dated 28/6/2006

457 6.26%, cf. average for England of 9.08%. <http://www.statistics.gov.uk/StatBase/Expodata/Spreadsheets/D8296.xls>

458 Response to Additional Questions, Q2

459 *Proposal Document*, p.7

460 *Ibid*, p.8

369. However, as a city, Middlesbrough lacks city assets and the council is working with neighbouring Stockton Borough Council in a 20-year programme to create a city scale environment. Leisure and tourism are identified as key potential drivers in this programme.⁴⁶¹ A casino development is seen as creating a favourable perception of the tourist assets of the area and adding considerably to the critical mass of the town as a leisure and entertainment destination.⁴⁶²
370. The regional policy context is favourable.⁴⁶³ There is evidence of market interest leading to a timely development of the proposal.⁴⁶⁴
371. Notwithstanding some local opposition of principle,⁴⁶⁵ the proposal has been endorsed by full council and continues to have the support of the council and the Mayor.⁴⁶⁶
372. Middlesbrough offers a good opportunity to test the social impact of a large casino development in a city region necessarily undergoing substantial regeneration.

Milton Keynes

About Milton Keynes

373. Forty years ago, what is now the City of Milton Keynes was a number of small towns and villages set in a rural area. Designated as a New Town in 1967,⁴⁶⁷ it has in recent decades been the fastest growing city in England⁴⁶⁸ and now (2005) has a resident population of 218,500.⁴⁶⁹
374. Better off than the national average in terms of multiple deprivation (it is the 220th most deprived local authority area in England,⁴⁷⁰ lying in the seventh lowest 10 percentile band of multiple indices of deprivation.⁴⁷¹) and with the proportion of economically active in the population of working age in the period April 2005 – March 2006 as high as 88.6%, of whom 78.9% were in employment, the city is generally successful and prosperous. Unemployment stood at 2.2% in October 2006 against a national average of 2.5%.⁴⁷²
375. Nevertheless there are pockets of deprivation within the city in terms of unemployment, low activity rates, poor numeric and literary skills, and lack of qualifications.⁴⁷³

⁴⁶¹ *Ibid*, pp.3 & 4

⁴⁶² *Ibid*, p.6. Response to Additional Questions, Q3

⁴⁶³ *Proposal Document*, p.19, and see consultations above

⁴⁶⁴ Further submission dated August 2006, pp.1, 8-10

⁴⁶⁵ Letter dated 10/4/2006 from the Darlington District Synod of the Methodist Church

⁴⁶⁶ Response to Additional Questions, Q4

⁴⁶⁷ Cherry, G E. (1974) *The Evolution of British Town Planning*, London, RTP1

⁴⁶⁸ *Proposal Document*, paragraph 2.2

⁴⁶⁹ *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006)

⁴⁷⁰ ODPM (2004) *Indices of Deprivation 2004*

⁴⁷¹ *Ibid*. percentile bands of average score

⁴⁷² *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

⁴⁷³ *Proposal Document*, paragraph 2.4

The proposal

376. The proposal is for a large and a small casino, or, if unsuccessful, a large casino only. A number of sites are available, in the city centre and associated with other leisure facilities.⁴⁷⁴
377. In order that we may achieve a good spatial/typical spread of casinos to be permitted, only a large casino is here being considered.

Consultations and regional considerations

378. Milton Keynes is designated as a major growth area within the Sustainable Communities Plan.⁴⁷⁵ As such, it also features in the sub-regional planning strategy for the Milton Keynes-South Midlands major growth area which is to form part of the approved RSS for the South East and East Midlands regions.⁴⁷⁶ A core aim of the sub-regional strategy is for Milton Keynes to become a major regional centre. The draft RSS for the South East supports the growth of leisure facilities and tourism in Milton Keynes as a matter of priority.⁴⁷⁷

Considerations

379. The proposal offers a good opportunity to test social impact in a major growth area.
380. The proposal is intended to increase leisure and recreational facilities which are needed in the city for an older and more sophisticated audience.⁴⁷⁸ Business tourism has been targeted and this is increasing.⁴⁷⁹
381. In the city is an agency, the Milton Keynes Economy and Learning Partnership, which has the aim of reducing the number of people suffering from economic exclusion.⁴⁸⁰ The council is used to working with other agencies to deal with social problems that arise in the course of the city's development.⁴⁸¹
382. The regional policy context appears to be very supportive.⁴⁸²
383. The city is accessible from major population centres including London and Birmingham⁴⁸³ and there is evidence of market interest.⁴⁸⁴
384. Following local consultation, the proposal has been endorsed by the Full City Council.⁴⁸⁵
385. Although the city ranks low in the score of multiple deprivation, it is not wholly lacking in this unfortunate condition, and it satisfies others among our criteria. In particular, Milton Keynes offers an excellent opportunity to test the social impact of a large casino development in a growth zone.

474 Response to Additional Questions, p.3

475 Proposal Document, paragraph 2.1

476 Ibid, paragraph 2.3. The city falls inconveniently in both regions, hence the special sub-regional strategy

477 Letters dated 28/6/2006 and 28/7/2006 from the South East Regional Assembly

478 Proposal Document, paragraph 3.2

479 Ibid, paragraph 2.7

480 Ibid, paragraph 3.4, Response to Additional Questions, p.2

481 Ibid, paragraphs 3.6 & 3.7

482 Ibid, paragraph 7.4

483 Ibid, paragraph 6.4, Response to Additional Questions, p.5

484 Ibid, paragraph 6.23

485 Ibid, paragraphs 5.3 & 5.5

Newham

About Newham

386. The London Borough of Newham is situated in the east of London, within the Thames Gateway area which is a national priority for regeneration.⁴⁸⁶ It takes in much of the recently revitalised docklands, includes London City Airport, has excellent rail and road links and will be the main centre for the Olympic and Paralympic Games in 2012.⁴⁸⁷ In 2005 the borough had a residential population of 246,200⁴⁸⁸ of whom the majority, 60.59%, have their origins in ethnic minority groups.⁴⁸⁹
387. Newham is one of the most deprived inner city areas in England.⁴⁹⁰ Unemployment rates are very high.⁴⁹¹ In fact it is the 6th most deprived local authority area in England,⁴⁹² lying in the very lowest 10 percentile band of multiple indices of deprivation.⁴⁹³ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 65.1%, of whom 59.4% were in employment. Unemployment stood at 5.4% in October 2006 against a national average of 2.5%.⁴⁹⁴

The proposal

388. The proposal is for a large casino, for which a choice of strategic regeneration sites would be on offer.⁴⁹⁵ The proposal offers the opportunity to reclaim a part of the substantial area of contaminated former industrial land within the borough.⁴⁹⁶

Consultations and regional considerations

389. The Mayor of London's Plan identifies Newham as an area for regeneration, with three "Opportunity Areas" identified as Stratford, the Lower Lea Valley and the Royal Docks.⁴⁹⁷ Although the Mayor of London in consultation has confined comments to the location of the regional casino, the Newham proposal is supported by the London Thames Gateway Development Corporation⁴⁹⁸ and London First.⁴⁹⁹

⁴⁸⁶ Proposal Document, p.1

⁴⁸⁷ *Ibid*, p.2

⁴⁸⁸ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006)

⁴⁸⁹ Proposal Document, p.2, Census 2001 <http://www.statistics.gov.uk/StatBase/Expodata/Spreadsheets/D8296.xls> accessed 29/11/2006

⁴⁹⁰ Proposal Document, p.1

⁴⁹¹ *Ibid*, p.2

⁴⁹² ODPM (2004) *Indices of Deprivation 2004*

⁴⁹³ *Ibid*. percentile bands of average score

⁴⁹⁴ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

⁴⁹⁵ Proposal Document, p.13

⁴⁹⁶ *Ibid*, p.2

⁴⁹⁷ *Ibid*, p.1

⁴⁹⁸ Letter to CAP, dated 27/6/2006

⁴⁹⁹ Response to Additional Questions, p.5

Consideration

390. This London borough is quite untypical of almost everywhere in Britain with a very high representation of ethnic minorities and very high density population, and tracing the social impact in such a large and busy area situated in the country's largest city region would be difficult. Nevertheless, Newham offers a unique opportunity to test social impact in a severely deprived inner city area facing massive change.
391. There is considerable expertise in the borough, not least through the local Access to Jobs Team, in identifying and responding to employers' needs and equipping local people with skills relevant to the local labour market. This expertise has led to success in finding jobs in a hard to reach community.⁵⁰⁰ Good progress has also been made in terms of preparing to assess social impact, and militate against, and deal with, any issues arising.
392. Newham enjoys excellent public transport facilities that are expected to be further augmented over the next few years.⁵⁰¹ Passenger throughput at the London City airport is expanding.⁵⁰² London is estimated to have attracted more than 26 million visitors in 2006⁵⁰³ and with Newham at the centre of plans for the 2012 Olympic and Paralympic Games⁵⁰⁴ the success of a suitably sited large casino cannot be in doubt.
393. The casino proposal is consistent with the regional and local policy context.⁵⁰⁵
394. As to willingness to license, the borough council has consulted widely on the proposal and relies upon the Mayor's decision making power for authority for the proposal.
395. Newham's claim to a large casino, in our view, rests more on its acute regeneration needs and its track record in the social and employment fields than on its intrinsic merits as a place for testing social impact. While the opportunity to test the isolated social impact in a borough with so many other regenerative influences may be difficult, we consider the opportunity so to do a worthwhile challenge. Moreover Newham, as an area of London with acute regeneration needs, presents a useful contribution to geographical spread.

North East Lincolnshire*About North East Lincolnshire*

396. North East Lincolnshire, lying on the south bank of the Humber and in the Yorkshire and the Humber Region, has a residential population (2005) of 157,500 which is declining in number. Its principal towns are Grimsby and Cleethorpes with populations of 37,700 and 84,800 respectively.⁵⁰⁶ Grimsby remains a fishing port/market⁵⁰⁷ and manufacturing town while the seaside resort of Cleethorpes is the main local centre for tourism.⁵⁰⁸

⁵⁰⁰ *Proposal Document*, p.5, *Response to Additional Questions*, pp.1 & 2

⁵⁰¹ *Ibid*, p.1

⁵⁰² *Ibid*, p.3

⁵⁰³ *Ibid*, p.3

⁵⁰⁴ *Ibid*, p.2

⁵⁰⁵ *Response to Additional Questions*, p.4

⁵⁰⁶ *Proposal Document*, p.2

⁵⁰⁷ Grimsby Fish Market , <http://www.grimsbyfishmarket.co.uk/> accessed 29/11/2006

⁵⁰⁸ *Proposal Document*, pp.2 & 3

397. With the loss of local jobs, there is considerable evidence of deprivation in the area⁵⁰⁹ and some wards exhibit most severe conditions.⁵¹⁰ North East Lincolnshire is the 69th most deprived local authority area in England,⁵¹¹ lying in the second lowest 10 percentile band of multiple indices of deprivation.⁵¹² The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 75.9%, of whom 70.9% were in employment. Unemployment stood at 3.8% in October 2006 against a national average of 2.5%.⁵¹³

398. Yet tourism remains an important sector in North East Lincolnshire with a stated 2.6 million visits a year.⁵¹⁴ Improvements to both principal railway stations are planned⁵¹⁵ and a four star hotel has recently been added to the local bed space stock.⁵¹⁶ The regeneration strategy for the area, “New Horizons”, specifically aims to secure the development of a hotel and casino facility.⁵¹⁷

The proposal

399. The proposal is for a small casino. A number of potential sites around Cleethorpes have been identified.⁵¹⁸

Consultations and regional considerations

400. The RSS says that sub-regional centres, such as Grimsby and Cleethorpes are the preferred locations for large or small casinos. Other policies of the strategy support regeneration and urban renaissance in these towns.⁵¹⁹ The proposal is supported by the regional development agency, Yorkshire Forward.⁵²⁰

Consideration

401. Although the council offer their developed Community Strategy, an employment outreach programme, and the fact that the nearest existing casino is over 50km away as influential in selecting a good place to test social impact,⁵²¹ it seems to us that the best card is that it would offer a good opportunity to test the social impact of a small casino development in an area undergoing significant regeneration.

402. The council have researched questions about social impact, and although they demonstrate little or no experience in dealing with them⁵²² they have recently taken steps to establish expertise in the field.⁵²³

⁵⁰⁹ *Ibid*, p.4

⁵¹⁰ *Ibid*, p.5

⁵¹¹ ODPM (2004) *Indices of Deprivation 2004*

⁵¹² *Ibid*. percentile bands of average score

⁵¹³ *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

⁵¹⁴ *Proposal Document*, p.13

⁵¹⁵ *Ibid*, p.3

⁵¹⁶ *Ibid*, p.4

⁵¹⁷ N E Lincolnshire Council, *New Horizons, A Regeneration Strategy 2006-2022*, p.30

⁵¹⁸ *Proposal Document*, pp.10 & 11

⁵¹⁹ *Proposal Document*, p.16

⁵²⁰ *Response to Additional Questions paragraph 7.0*

⁵²¹ *Proposal Document*, pp.5 & 6

⁵²² *Ibid*, pp.6 & 7

⁵²³ *Response to Additional Questions paragraph 3.0*

403. Despite the fact that the regional policy context is favourable⁵²⁴ and there is evidence of market interest,⁵²⁵ it has a tiny catchment and therefore it would be difficult to realise the full regenerative benefits of investment,
404. While the council professes strong support for their proposal, they do not appear to have consulted widely, nor taken the proposal to full council.⁵²⁶
405. The proposal, although it has merits in terms of addressing the need for regeneration, is not sufficiently strong on being a good test of social impact or on willingness to license by the council when compared with other proposals that we have seen.

Peterborough

About Peterborough

406. The historic City of Peterborough, with its present (2005) population of 159,000⁵²⁷ is a growth area with an additional 42,000 residents expected by 2021.⁵²⁸ Generally fairly prosperous, the borough is the 111th most deprived local authority area in England,⁵²⁹ lying in the fourth lowest 10 percentile band of multiple indices of deprivation.⁵³⁰ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 79.1%, of whom 75.0% were in employment. Unemployment stood at 2.9% in October 2006 against a national average of 2.5%.⁵³¹ Nevertheless, there is evidence of pockets of deprivation with unemployment and low wages a feature.⁵³² For example in one ward 46% of all households had no-one in employment.⁵³³ The city receives Urban II funding.⁵³⁴
407. Peterborough enjoys good rail links⁵³⁵ with London and the North, and is a transport hub for the East of England.⁵³⁶

The proposal

408. The proposal is for a large casino which could, possibly, support a proposal for a Peterborough Arena.⁵³⁷

524 *Ibid*, p.16

525 *Ibid*, p.15

526 *Ibid*, pp.11 & 12, Response to Additional Questions paragraph 5.0

527 *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006)

528 *Proposal Document*, p.1

529 *ODPM (2004) Indices of Deprivation 2004*

530 *Ibid*. percentile bands of average score

531 *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

532 *Proposal Document*, p.5

533 *Ibid*, p.10

534 *Ibid*, p.1

535 *Ibid*, p.15

536 *Ibid*, p.1

537 *Response to Additional Questions*, p.4

Consultations and regional considerations

409. The draft RSS for the East of England proposes Peterborough as the main city for the north-western part of the region and supports the regeneration of the city centre including leisure uses. It sets out support for a casino in the region, but without saying where.⁵³⁸

Consideration

410. The council argues that the absence of other casinos within 50km of their city points to it being a good site for testing social impact. We note also that the proportion of ethnic minorities in the population is close to the national average,⁵³⁹ and it is a good example of an expanding town.
411. The council asserts a successful track record of managing social impact, for example in their Peterborough Evening Partnership, but in other respects the evidence for that record is thin. As to bringing people into jobs, there is an initiative to provide training for ethnic minorities and immigrants, and a construction training initiative.⁵⁴⁰
412. It is argued locally that Peterborough does not have the rich mixture of facilities and institutions typical of a more “slow growing” city.⁵⁴¹ No doubt a casino would help in this regard”.⁵⁴² The casino would also help the city’s tourism aims: Peterborough is stated to receive 650,000 staying visitors and 2.9 million day trippers a year.⁵⁴³ There is a stock of 2,600 visitor bedspaces.⁵⁴⁴ The Community Strategy has targeted a 10% increase in business tourism to enhance Peterborough’s attractiveness as a destination.⁵⁴⁵ Nevertheless, while a large casino would be one feature adding to the attractions of the city and assisting in its growth, we are not convinced that the proposed casino would be sufficiently viable to deliver the city’s aspirations for an arena.
413. The regional policy context is favourable⁵⁴⁶ and there is evidence of market interest.⁵⁴⁷
414. As to willingness to license, there is some local opposition, including that of the city’s Member of Parliament.⁵⁴⁸ There has been little local consultation and no evidence of full council support has been presented.⁵⁴⁹ This, to our mind, does not indicate wholehearted willingness to license.
415. Peterborough as an expanding town would be a good place to test social impact in this situation but we are concerned both as to the comparative regeneration benefits and the apparent lack of wholehearted willingness to license in the longer term.

538 *Proposal Document*, pp.17 & 18

539 10.29%, c.f.9.08% Census 2001, <http://www.statistics.gov.uk/StatBase/Expodata/Spreadsheets/D8296.xls>

540 *Response to Additional Questions*, p.9

541 *Ibid*, p.5

542 *Ibid*, p.6

543 *Proposal Document*, p.3

544 *Ibid*, p.3

545 *Ibid*, p.3

546 *Ibid*, p.17

547 *Proposal Document*, p.1

548 Stewart Jackson, MP. *Proposal Document*, p.13

549 *Proposal Document*, p.13, *Response to Additional Questions*, p.3

Restormel

About Restormel

416. The Borough of Restormel stretches across Cornwall from Newquay on the north coast to St Austell in the south. The (2005) population of the borough is 100,300, with 22,650 living in St Austell and 19,600 in Newquay.⁵⁵⁰ In the seaside resort of Newquay, the premier seaside resort of Cornwall, 40% of the working population are employed in tourism and leisure activity.⁵⁵¹ There are very few ethnic minority residents.⁵⁵²
417. Restormel is the 72nd most deprived local authority area in England,⁵⁵³ lying in the third lowest 10 percentile band of multiple indices of deprivation.⁵⁵⁴ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 76.4%, of whom 75.8% were in employment. Unemployment stood at 2.2% in October 2006 against a national average of 2.5%.⁵⁵⁵ But amidst this relative prosperity there are pockets of deprivation⁵⁵⁶ and there is an acute adverse house price to wage level ratio.⁵⁵⁷ Seasonal unemployment is high and wages are low.⁵⁵⁸
418. Newquay has significant commuter outflows to industrial and commercial areas established inland. The planned closure of RAF St. Mawgan will result in substantial job loss.⁵⁵⁹
419. In 2000 Cornwall was designated an EU Objective 1 area due to its low GDP per head.

The proposal

420. It is proposed that either a large or a small casino should be located in Newquay.

Consultations and regional considerations

421. The Regional Economic Strategy and the RSS both support the development of the tourism industry in Newquay.⁵⁶⁰ The draft RSS for the South West contains a generic policy about the location of large and small casinos which the Regional Assembly considers “arguably” supports the proposal at Newquay.⁵⁶¹ (The regional development agency’s preference is Torbay).⁵⁶²

⁵⁵⁰ Proposal Document, p.3

⁵⁵¹ Proposal Document, Executive Summary

⁵⁵² 1.1% Proposal Document, p.3

⁵⁵³ ODPM (2004) *Indices of Deprivation 2004*. We acknowledge that some people in this district of Cornwall prefer it not to be described as in England

⁵⁵⁴ *Ibid.* percentile bands of average score

⁵⁵⁵ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

⁵⁵⁶ Proposal Document, p.4

⁵⁵⁷ Proposal Document, p.4

⁵⁵⁸ Proposal Document, Executive Summary

⁵⁵⁹ Proposal Document, p.5

⁵⁶⁰ Proposal Document, Executive Summary

⁵⁶¹ E-mail to CAP dated 12/4/2006

⁵⁶² Letter to CAP dated 28/6/2006

Consideration

422. A small town, Newquay would be a relatively easy place in which to test social impact among its residents, though it is atypical as to its ethnic makeup and it would be difficult to trace impacts among visitors. In other respects this location offers a good opportunity to test the social impact of a small casino development in a peripheral seaside resort in need of regeneration.
423. The borough is stated to attract 1.5 million staying visitors a year⁵⁶³ and there is a local stock of 34,000 bedspaces.⁵⁶⁴ There is a rail link and Newquay Cornwall Airport is situated at St Mawgan supported by the County Council,⁵⁶⁵ while there are good bus services including buses operated by local night clubs bringing in customers from major towns in Cornwall.⁵⁶⁶
424. In short, Newquay has suffered from much of the problems of other cold-water resorts but is not at all in terminal decline. A local action framework seeks to extend the attraction of Newquay throughout the year.⁵⁶⁷ Indeed there is evidence of stability in the local tourism industry as the traditional family seaside gives place to more specialised activities, such as environmental tourism.⁵⁶⁸ Undoubtedly a casino would add to local attractions, but even though Newquay's night-time economy is fed from all over Cornwall, we would lack sufficient confidence on viability and therefore regeneration benefits.⁵⁶⁹
425. The council has experience of local training and skills development⁵⁷⁰ but the proposal is rather thin on dealing with any social problems that might arise.
426. As to willingness to license, the proposal has the support of Full Council.
427. This could be quite a good proposal but we lack confidence in regeneration benefits and we note lukewarm support from regional bodies who seem markedly to prefer the Torbay proposal to this one.

Scarborough*About Scarborough*

428. The Borough of Scarborough, including the towns of Whitby, Scarborough and Filey, lies on the coast of Yorkshire. In 2005 the borough had a resident population of 107,000. Traditionally, the borough's economic base has been tourism, agriculture and fishing, but like all cold-water resorts it has suffered from a decline in traditional seaside holidays and now, under the auspices of Yorkshire Forward's "Scarborough Renaissance Charter", aims to diversify its economy, attracting inward investment and delivering quality services in the town of Scarborough.⁵⁷¹

⁵⁶³ Proposal Document, p.4

⁵⁶⁴ Proposal Document, p.7

⁵⁶⁵ Proposal Document, pp.8 & 9

⁵⁶⁶ Proposal Document, p.15

⁵⁶⁷ Proposal Document, p.11

⁵⁶⁸ Proposal Document, p.9

⁵⁶⁹ Response to Additional Questions, section 5

⁵⁷⁰ Proposal Document, Executive Summary

⁵⁷¹ Proposal Document, pp. 2. & 8

429. Tourism brings over 5 million people to the borough each year and the town is still largely dependent on tourism as an employer: indeed it is regarded as vital to the local economy and there are signs of increasing private sector investment in the town.⁵⁷²
430. The borough is the 102nd most deprived local authority area in England,⁵⁷³ lying in the third lowest 10 percentile band of multiple indices of deprivation.⁵⁷⁴ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 81.4%, of whom 77.4% were in employment. Unemployment stood at 2.9% in October 2006 against a national average of 2.5%.⁵⁷⁵ But many of the jobs in tourism are seasonal and low paid,⁵⁷⁶ and there are significant pockets of deprivation concentrated in Scarborough town.⁵⁷⁷

The proposal

431. The proposal is for both a large casino and a small casino, with a fall-back of either. In order to achieve a good spatial/typical distribution, we are not considering recommending more than one casino in any one place, so it is the fall back that is now considered here. The proposed location is in Scarborough town, most likely at “The Sands” an active brownfield development at North Bay, but possibly at South Bay, the town’s traditional entertainment area.⁵⁷⁸

Consultations and regional considerations

432. In the draft RSS Scarborough is identified as the main service centre in the coastal zone where most new development should be focussed.⁵⁷⁹ The Regional Economic Strategy, approved in April 2006, aims to boost tourism in the area.⁵⁸⁰

Consideration

433. The council already has experience of testing the impact of two casinos in the town, considering there to be no detrimental effect but a welcome addition to the night-time economy. Either a large or small casino would present a good opportunity to test social impact in a coastal resort.
434. Over the past four years, the council has been engaged in the management of disadvantaged neighbourhoods, including the promotion of responsible attitudes to gambling and providing support services such as debt management.⁵⁸¹ Given the evidence of low skill levels in the local labour market,⁵⁸² it is disappointing that no evidence has been forthcoming as to getting long term unemployed into the jobs that would be offered.

⁵⁷² Proposal Document, pp.8 & 9

⁵⁷³ ODPM (2004) Indices of Deprivation 2004

⁵⁷⁴ Ibid. percentile bands of average score

⁵⁷⁵ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

⁵⁷⁶ Proposal Document, pp. 2. & 4

⁵⁷⁷ Proposal Document, p.10

⁵⁷⁸ Supplementary Information, August 2006, p.3

⁵⁷⁹ Response to Questions, p.9

⁵⁸⁰ Supplementary Information, August 2006, p.1

⁵⁸¹ Response to Questions, p.9

⁵⁸² Proposal Document, p.9

435. The evidence of private sector investment in Scarborough is such as to persuade us that a casino proposal there is likely to be progressed successfully, although in our view more successfully as a small casino than a large.
436. The regional policy context is favourable and, given the endorsement of the proposal by the council's executive body in accordance with the council's constitution,⁵⁸³ we see no problem over willingness to license.
437. Scarborough would be a reasonable place in which to test social impact. Development of either a large or a small casino would encourage redevelopment and be a useful contributor to the town's regeneration. However we regard the proposal as more appropriate for a small casino than a large because Scarborough has a relatively small local catchment area. Other areas with a larger catchment have a stronger case for a large casino.

Sefton

About Sefton

438. The Metropolitan Borough of Sefton extends from the estuary of the River Ribble to the northern boundary of Liverpool, containing within its boundaries the seaside resort of Southport, the residential suburbs of Formby, Aintree and Maghull and the older industrial towns of Litherland, Crosby and Bootle, the two last mentioned containing the remaining active parts of Liverpool docks. The population of the metropolitan borough in 2005 was 280,900.
439. The Borough of Sefton is the 99th most deprived local authority area in England,⁵⁸⁴ lying in the third lowest 10 percentile band of multiple indices of deprivation.⁵⁸⁵ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 75.9%, of whom 71.7% were in employment. Unemployment stood at 3.0% in October 2006 against a national average of 2.5%.⁵⁸⁶ There are pockets of deprivation exhibiting unemployment and low average income levels not only in the older industrial areas but in Southport itself where two of the most deprived wards are in the seafront area.⁵⁸⁷

⁵⁸³ Response to Questions, p.7

⁵⁸⁴ ODPM (2004) *Indices of Deprivation 2004*

⁵⁸⁵ *Ibid.* percentile bands of average score

⁵⁸⁶ *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

⁵⁸⁷ *Proposal Document*, p.3, Additional Information, p.1

The proposal

440. Sefton's proposal is for a casino in Southport. Southport aims to emulate Deauville rather than Las Vegas⁵⁸⁸ and so the proposal is for a small casino. The proposal, elaborated in conjunction with the Regional Development Agency and a local casino operator, is for the casino to be incorporated in a development complementary to the town's Floral Hall, claimed to be the largest conference centre in Merseyside. This development comprises a new hotel, exhibition and cultural quarter and the relocation of an existing casino.⁵⁸⁹

Consultations and regional considerations

441. The draft RSS for the North West, currently (October 2006-January 2007) being examined in public, contains a generic policy which can be reasonably interpreted as supporting the location of a casino in Southport. The Regional Economic Strategy for the North West makes specific reference to "capitalising on the strengths and key assets of Southport as a classic resort".⁵⁹⁰ The Sefton proposal for Southport is supported by the Regional Development Agency.⁵⁹¹

Consideration

442. This location offers a good opportunity to test the social impact of a small casino development in a seaside resort seeking to improve itself.
443. Whilst Southport like most seaside resorts in Britain, has experienced decline in the past, decline has ceased and, if there are worries about the economic situation, it is that it is standing still. The borough is stated currently to attract 13 million visitors a year, the majority to Southport.⁵⁹²
444. The genesis of the proposal suggests that implementation would be likely.⁵⁹³ Construction of the Floral Hall enhancement project is imminent.⁵⁹⁴
445. The council having held discussions with key partners and on the basis of its experience with existing casinos, expects there to be no significant increase in social problems, but nevertheless has set up a debt crisis group and intends to monitor the situation if a new casino is built.⁵⁹⁵
446. While the proposed casino would assist in the project to enhance the attractiveness of the Floral Hall and thereby assist in the economic regeneration of Southport, it appears to be assumed that an increase in the number of local jobs would automatically relieve local deprivation, but there is little evidence of steps being taken to achieve that end, for example in training and pre-employment coaching or in other measures to improve social conditions.

⁵⁸⁸ *Ibid*, p.3

⁵⁸⁹ *Ibid*, pp.5,9 & 10

⁵⁹⁰ *Ibid*, p.11

⁵⁹¹ Additional Information, p.3

⁵⁹² *Proposal Document*, p.3

⁵⁹³ *Ibid*, p.3

⁵⁹⁴ Additional Information, p.2

⁵⁹⁵ *Proposal Document*, p.8, Additional Information, p.1

447. The proposal has been the subject of some local consultation and has received extensive local media coverage. The Full Council has endorsed it.⁵⁹⁶
448. The proposal has its merits, but with only a limited number of licences available we consider that the regeneration case of others we have considered is stronger.

Solihull

About Solihull

449. The Metropolitan Borough of Solihull lies between Birmingham and Coventry. The home of Birmingham Airport and the National Exhibition Centre, it has a (2005) resident population of 200,900.⁵⁹⁷ The borough enjoys exceptional connectivity in terms of road and rail infrastructure which is further enhanced by the presence of the airport.⁵⁹⁸
450. On the whole, Solihull is one of the better-off parts of the West Midlands conurbation, but it also contains a number of communities and neighbourhoods subject to acute deprivation.⁵⁹⁹ The borough is the 233rd most deprived local authority area in England,⁶⁰⁰ lying above the national average in the seventh lowest 10 percentile band of multiple indices of deprivation.⁶⁰¹ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 80.4%, of whom 76.4% were in employment. Unemployment stood at 2.2% in October 2006 against a national average of 2.5%.⁶⁰² But although the borough has only limited pockets of deprivation, the severity of difficulties experienced in these areas has resulted in their being included by the Regional Development Agency in a Regeneration Zone.⁶⁰³

The proposal

451. The proposal for a regional casino being unsuccessful, the fall-back proposal for a large casino is being considered here. The proposed casino could be located in the area of the National Exhibition Centre (NEC) in collaboration with the joint owners, Birmingham City Council and Birmingham Chamber of Commerce, but other locations could be considered.⁶⁰⁴

596 *Ibid.*, p.8

597 *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006)

598 *Proposal Document*, p.3

599 *Ibid.*, p.2, Response to Additional Questions pp.1-3

600 *ODPM (2004) Indices of Deprivation 2004*

601 *Ibid.* percentile bands of average score

602 *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

603 *Proposal Document*, p.2

604 *Ibid.*, p.4

Consultations and regional considerations

452. Encouragement of tourism, particularly at the NEC, is a feature of both the West Midlands RSS and also the Regional Economic Strategy. The regional proposal was strongly supported by the Regional Development Agency⁶⁰⁵ and the Regional Assembly.⁶⁰⁶

Consideration

453. This location offers the opportunity to test the social impact of a large casino development in a much visited part of a conurbation, yet one with localised and acute regeneration needs.
454. The council is experienced in dealing with anti-social behaviour, crime and disorder, and in crowd control at the NEC. If the proposal were to be accepted, the council would monitor the whole range of social problems to establish links to the casino.
455. Even though the borough is not among the most deprived areas, there is considerable local experience of linking job opportunities with targeted deprived groups. Training, childcare and outreach activity is proposed to help local people to access jobs.⁶⁰⁷
456. Tourism is a key sector in Solihull with a stated more than four million visitors a year attending exhibitions at the NEC alone.⁶⁰⁸ A range of national and international hotel chains are represented in the borough.⁶⁰⁹
457. The casino proposal is consistent with the regional policy context⁶¹⁰ and there is evidence of market interest.⁶¹¹
458. The proposal has been the subject of extensive public consultation and has the support of the full Metropolitan Borough Council. Birmingham City Council has also confirmed its full support for the proposed large casino.
459. In many respects this is a good proposal, offering advantages in respect of all our remitted criteria. Given the pivotal role of the NEC in the regional economy, it could be said to have regional significance.

⁶⁰⁵ Letters to CAP dated 28/6/2006 and 7/8/2006

⁶⁰⁶ Letter to CAP dated 22.6.2006

⁶⁰⁷ *Proposal Document*, pp.7 & 10, Response to Additional Questions p.7

⁶⁰⁸ *Ibid*, p.3

⁶⁰⁹ *Ibid*, p.3

⁶¹⁰ *Ibid*, p.16

⁶¹¹ *Ibid*, p.16

South Tyneside

About South Tyneside

460. The Borough of South Tyneside, as its name suggests, is situated where the River Tyne meets the North Sea. Containing towns such as South Shields, Hebburn and Jarrow it forms part of the Tyne and Wear city region.⁶¹² Mainly industrial in character it has an attractive coastline.⁶¹³ Jarrow Monastery, the lifetime home of St. Bede the Venerable, is being considered for World Heritage status.⁶¹⁴ The borough's population in 2005 was 151,300.
461. The decline of shipbuilding, coal mining and heavy engineering in the 20th century hit the area hard, but more recently there have been some signs that decline is ceasing.⁶¹⁵ Nevertheless, there remains evidence of extensive deprivation with low income levels a particular feature. The borough is the 28th most deprived local authority area in England,⁶¹⁶ lying in the very lowest 10 percentile band of multiple indices of deprivation. The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 74.1%, of whom 67.2% were in employment. Unemployment stood at 4.5% in October 2006 against a national average of 2.5%.⁶¹⁷ There is evidence of extensive and severe deprivation with low income levels a particular feature.⁶¹⁸

The proposal

462. Proposed is a large casino, with a small fallback to be located possibly on the South Shields Foreshore, the South Shields Riverside or the A19 Corridor.⁶¹⁹

Consultations and regional considerations

463. The proposal is supported by the North East Regional Assembly and "ONE NorthEast" the Regional Development Agency for the North East Region.⁶²⁰ The draft RSS for the North East submitted in June 2005 proposes that large and small casinos should be situated in sustainable locations in urban centres such as South Shields.⁶²¹

Consideration

464. The council is keen to enhance its tourism economy, building on its undoubted natural and historic heritage. The foreshore is stated to be visited by more than one million visitors a year, but tourism is dominated by day visits reflecting the small stock of overnight accommodation.⁶²²

⁶¹² *Proposal Document*, p.4

⁶¹³ *Ibid*, frontispiece, & p.6

⁶¹⁴ *Ibid*, p.4

⁶¹⁵ *Ibid*, p.4

⁶¹⁶ ODPM (2004) *Indices of Deprivation 2004*

⁶¹⁷ *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

⁶¹⁸ *Proposal Document*, p.11

⁶¹⁹ *Proposal Document*, pp.11-13

⁶²⁰ Letter to CAP dated 28/6/2006

⁶²¹ *Proposal Document*, p.17

⁶²² *Proposal Document*, pp.5 & 6

465. The local strategic partnership has a well-developed anti-poverty strategy and well-developed arrangements for bringing long-term workless into employment.⁶²³ It is aware that expenditure on gambling is high in the region.⁶²⁴ It recognises that steps would need to be taken to deal with any social problems arising from the development of the proposed casino.⁶²⁵
466. The regional policy context is favourable⁶²⁶ and there is evidence of market interest.⁶²⁷
467. As to willingness to license, the council tell us that “lead members” are fully supportive, but that they do not consider that submission of a bid is an executive decision that needs to go to Full Council. A “low-key approach” has been taken to consultation.⁶²⁸ To our mind this is not unequivocal evidence of willingness to license in the long term.
468. While the area is typical of a former industrial area needing and indeed undergoing regeneration, the proposal is comparatively weak as regards willingness to license.

Southampton

About Southampton

469. The City of Southampton, situated on the central south coast of England, is a historic city with Roman, Saxon and Medieval buildings surviving.⁶²⁹ It is the UK’s principal cruise port⁶³⁰ and has a diverse range of other economic activities.⁶³¹ The city’s population in 2005 was 222,000,⁶³² and it is claimed⁶³³ to be the centre of a growing Solent city region of over 890,000 residents.⁶³⁴ The City has good rail links, an extensive network of bus links, ferries to the Isle of Wight and Southampton International Airport is forecast to continue to grow.⁶³⁵
470. Despite being a most important port city there are pockets of deprivation within Southampton, some of which are concentrated near the port area.⁶³⁶ In fact it is the 95th most deprived local authority area in England,⁶³⁷ lying in the third lowest 10 percentile band of multiple indices of deprivation.⁶³⁸ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 74.5%, of whom 69.9% were in employment. Unemployment stood at 2.3% in October 2006 against a national average of 2.5%.⁶³⁹

623 *Ibid*, pp. 9 & 10

624. Response to Additional Questions, p.1

625 *Ibid*, p.9

626 *Proposal Document*, p.17

627 Response to Additional Questions, pp.1 & 4

628 *Ibid*, pp.2 & 3

629 *Proposal Document*, p.4

630 *Ibid*, p.4

631 *Ibid*, p.2

632 *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006)

633 *Proposal Document*, p.2. Portsmouth might argue that the region is actually polycentric

634 Including the City of Portsmouth, the Boroughs of Eastleigh and Gosport, Havant District and New Forest District. *NOMIS data* (www.nomisweb.co.uk, accessed 1/12/2006)

635 *Proposal Document*, p.3

636 *Ibid*, p.9

637 ODPM (2004) *Indices of Deprivation 2004*

638 *Ibid*. percentile bands of average score

639 *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

471. Tourism is important to the city, with more than 3 million visitors a year. Most of these are day visitors.⁶⁴⁰ There is a range of quality of bedspaces including four and five star accommodation.⁶⁴¹

The proposal

472. The proposal for a regional casino being unsuccessful, the fall-back proposal for a large casino is here being considered. The council has identified four potential sites lying in or near the port area and the city centre, with a site at the derelict Royal pier the top priority.⁶⁴²

Consultations and regional considerations

473. The proposal is supported by the Regional Development Agency (SEEDA)⁶⁴³ and the Regional Assembly (SERA).⁶⁴⁴ The draft RSS, shortly to be examined in public, regards Southampton as lying in a priority area for economic regeneration and a place where tourism facilities are to be upgraded as a matter of priority.

Consideration

474. With an ethnic minority population not too far from the national average,⁶⁴⁵ the city could be a useful place in which to study the social impact of a large casino in a port and regeneration area.

475. The city, for all its outward prosperity, has pockets of severe deprivation, particularly in the port area.

476. The council has a health and well being strategy which could be enhanced if needed in response to the development of the proposed casino.⁶⁴⁶ The council has EU funding to help long-term unemployed into jobs and their work has been used as a good practice example by the (then) Office of the Deputy Prime Minister.⁶⁴⁷ The council has a strategy for developing the night time economy.⁶⁴⁸

477. There is a supportive regional policy context and evidence of developer interest.⁶⁴⁹

478. Consultation, including a poll which was evenly balanced, has been undertaken. The decision of council's cabinet to submit the proposal has received cross party support in the council's scrutiny process.⁶⁵⁰

479. With pockets of severe deprivation and a good track record in getting long term unemployed into jobs, this is a generally good proposal which would provide a suitable place to test social impact.

⁶⁴⁰ Proposal Document, p.3

⁶⁴¹ Ibid, p.3

⁶⁴² Ibid, pp.9 & 18

⁶⁴³ Letter to CAP dated 28/9/2006

⁶⁴⁴ Letters to CAP dated 28/6/2006 & 28/7/2006

⁶⁴⁵ 7.63%, c.f. 9.08% in England (<http://www.statistics.gov.uk/StatBase/Expodata/Spreadsheets/D8296.xls>)

⁶⁴⁶ Proposal Document, p.6

⁶⁴⁷ Ibid, p.8

⁶⁴⁸ Ibid, p.4

⁶⁴⁹ Ibid, p.15

⁶⁵⁰ Ibid, p.12

Swansea

About Swansea

480. The City and County of Swansea is situated on the coast in the western part of industrial South Wales. In 2005, its resident population was 236,400.⁶⁵¹
481. In terms of indices of deprivation, Swansea, standing in the 5th 10 percentile band of multiple indices of deprivation,⁶⁵² does not appear to be suffering as badly as many others. The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 74.6%, of whom 70.6% were in employment. Unemployment stood at 2.4% in October 2006 against a national average of 2.5%.⁶⁵³ Nevertheless there is evidence of considerable localised deprivation in Swansea including areas where the unemployment rate is twice the city's average.⁶⁵⁴

The proposal

482. The proposal submitted was for a combination of a large and a small casino. A location in the city centre is preferred, in order to improve the centre's vitality and provide jobs for residents in the inner areas.⁶⁵⁵
483. However, in order to achieve a good spatial/geographical distribution, we are not willing to recommend two casinos in any one place, and the proposal now being considered is for the proposer's fall-back position, a large or a small casino.

Consultations and regional considerations

484. The proposal is supported by the National Assembly⁶⁵⁶ and the Wales Spatial Plan offers a supportive policy context.⁶⁵⁷

Consideration

485. The council has mechanisms already in place which would be used to monitor the social and economic impact of a new casino.⁶⁵⁸ And although the proportion of ethnic minority groups in the population of Swansea⁶⁵⁹ is similar to that of Wales but considerably less than that of England, as an industrial and port city in Wales, the city could be a useful addition to the potential portfolio of casinos in terms of achieving typical/geographical spread.

651 *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006)

652 See note at chapter 4, paragraph 91

653 *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

654 *Proposal Document*, p.4

655 *Ibid*, p.10

656 Letter dated 27/6/2006

657 *Proposal Document*, p.17. See also the relevant footnote to the Cardiff regional casino proposal

658 *Ibid*, p.6

659 *Ibid*, p.1

486. Swansea participates in a national (Wales) programme to develop a skilled and competitive workforce, and is helped by higher and further education institutions and by private training providers. The council works with others to address long term unemployment, economic inactivity and the pre-employment needs of people in receipt of incapacity or sickness benefit.⁶⁶⁰
487. The council is a member of the Swansea Community Action for Responsible Gambling (CARG) group, meeting to address problem gambling, and has been active in enforcing existing (1968 Act) gambling legislation.⁶⁶¹
488. Swansea is stated to receive almost 3.2 million tourist visitors a year.⁶⁶² Nevertheless an emerging Tourism Strategy acknowledges that there is currently a weak attraction base.⁶⁶³ Rail connections are available.⁶⁶⁴ There is evidence of market interest.⁶⁶⁵
489. There is undoubted need for regeneration in central Swansea, but such is the limited scale of the local catchment area that we consider in terms of the competition for large and small casinos, the proposal would rank higher in the competition for a small casino than in that for a large one.
490. The proposal, is endorsed by the council's cabinet, even though on the basis of the council's constitution (which does not require it) it has not been to a meeting of the Full Council. Nor has much consultation been undertaken, for fear of producing responses based on uninformed opinions.⁶⁶⁶ To our mind this is not the strongest of evidence of willingness to license in the long term.
491. There is a very strong regeneration case in Swansea and we are keen to test the social impact of a casino in a Welsh environment which would add to a good range of areas. While there could be doubts as to willingness to license in the long term, in other respects this appears to be a sound and well thought out proposal in terms of a small casino.

Torbay

About Torbay

492. The Borough of Torbay, comprising the seaside resorts of Torquay, Paignton and Brixham on the south coast of Devon has a resident population of 132,800.⁶⁶⁷ With Brixham also a small fishing port, the principal industry of all the towns is tourism.⁶⁶⁸ But like all seaside resorts in Britain, the traditional seaside holiday business has declined, as has the fishing industry, whilst manufacturing has experienced growth.⁶⁶⁹ Currently, Torbay is the 89th most deprived local authority area in England,⁶⁷⁰ lying in the third lowest

⁶⁶⁰ Proposal Document, p.7

⁶⁶¹ *Ibid*, pp.5 & 6

⁶⁶² *Ibid*, p.1

⁶⁶³ *Ibid*, p.3

⁶⁶⁴ *Ibid*, p.14

⁶⁶⁵ *Ibid*, p.12

⁶⁶⁶ Response to Additional Questions, pp.5 & 6

⁶⁶⁷ NOMIS data (www.nomisweb.co.uk, accessed 22/11/2006)

⁶⁶⁸ Proposal Document, cover

⁶⁶⁹ *Ibid*, p.1

⁶⁷⁰ ODPM (2004) *Indices of Deprivation 2004*

10 percentile band of multiple indices of deprivation.⁶⁷¹ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 76.5%, of whom 72.7% were in employment. Unemployment stood at 2.6% in October 2006 against a national average of 2.5%.⁶⁷² There is evidence of deprivation in terms of high levels of seasonal employment,⁶⁷³ low wage levels⁶⁷⁴ and an adverse housing affordability ratio.⁶⁷⁵ The area of greatest deprivation is actually mixed in with the premier tourism area of Torquay.⁶⁷⁶

The proposal

493. The proposal is for a large or a small casino.

Consultations and regional considerations

494. The draft RSS supports the development of further tourist attractions in Torbay. The South West Development Agency, in supporting proposals from both Bournemouth and Torbay, expresses a preference for Torbay.⁶⁷⁷ Support is also given to the proposal from the South West Regional Assembly.⁶⁷⁸

Consideration

495. The council's aim in regeneration is to improve the economic base by identifying and developing new growth opportunities.⁶⁷⁹ In recent years business tourism has increased, and today, the emphasis is on securing quality of offer.⁶⁸⁰ Torbay is stated to receive 1.45 million staying visitors a year and 3.8 million day visitors.⁶⁸¹ There are 48,410 bedspaces in the area⁶⁸² across the full quality range rising to five star accommodation.⁶⁸³ A casino development would increase year round employment and could assist in attracting more cruise liner visits.⁶⁸⁴
496. The council has met potential operators, but has not undertaken any other market research.⁶⁸⁵ Given the size of the immediate catchment area and its distance from major centres of population our opinion is that a small casino would have a greater chance of success than a large one.
497. A local college has a training course in catering and hospitality, and the chosen operator would be expected to co-operate with the council and Job Centre Plus in getting local people into the jobs that would be on offer.

⁶⁷¹ *Ibid.* percentile bands of average score

⁶⁷² *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

⁶⁷³ Further Submission, p.3

⁶⁷⁴ *Proposal Document*, p.3

⁶⁷⁵ Further Submission, p.2

⁶⁷⁶ Response to Additional Questions, p.2

⁶⁷⁷ Letter to CAP dated 28/6/2006

⁶⁷⁸ Letters to CAP dated 12/4/2006 and 31/7/2006

⁶⁷⁹ Further Submission, p.4

⁶⁸⁰ Response to Additional Questions, p.4

⁶⁸¹ *Proposal Document*, p.4

⁶⁸² *Ibid.*, p.13

⁶⁸³ Response to Additional Questions, p.8

⁶⁸⁴ *Ibid.*, p.9

⁶⁸⁵ Response to Additional Questions, pp.7 & 8

498. The council does not expect the location of a new casino in an area of deprivation to lead to an increase in social problems.⁶⁸⁶
499. We note the supportive regional policy context
500. As to willingness to license, the proposal has the support of the (directly elected) Mayor of Torbay and council members. There has been extensive consultation with relevant organisations and with the public, in which 73% of respondents were in favour of the proposal.⁶⁸⁷
501. This proposal is well supported regionally and offers a good opportunity to test the social impact of a small casino development in a seaside resort that has a clear strategy for regeneration and diversification.

Wolverhampton

About Wolverhampton

502. The City of Wolverhampton lies in the north-west of the West Midlands conurbation. The resident population in 2005 was 234,600. There is extensive deprivation including an area of particularly severe deprivation⁶⁸⁸ making Wolverhampton the 40th most deprived local authority area in England,⁶⁸⁹ lying in the second lowest 10 percentile band of multiple indices of deprivation.⁶⁹⁰ The proportion of economically active in the population of working age in the period April 2005 – March 2006 was 73.0%, of whom 68.3% were in employment. Unemployment stood at 5.4% in October 2006 against a national average of 2.5%.⁶⁹¹

The proposal

503. The proposal is for a large casino, with a fall-back option to a small casino, to be developed on Wolverhampton Racecourse. This racecourse, one of only two in Britain that is floodlit, is located close to the city centre, and is also the site of an hotel. The intention is to offer a gambling concept that is novel to the UK market, a “racino” in which the casino would complement on-course betting.⁶⁹²

Consultations and regional considerations

504. The proposal is supported by the West Midlands Regional Assembly.⁶⁹³ The RSS supports the improvement of existing tourism facilities *that are not the subject of environmental ... constraints*. (Our emphasis).

⁶⁸⁶ *Ibid*, p.3

⁶⁸⁷ *Proposal Document*, p.11

⁶⁸⁸ *Supplementary Submission*, August 2006, p.4

⁶⁸⁹ ODPM (2004) *Indices of Deprivation 2004*

⁶⁹⁰ *Ibid*. percentile bands of average score

⁶⁹¹ *NOMIS data* (www.nomisweb.co.uk, accessed 22/11/2006) The national average given is for Great Britain and the unemployment data is the claimant unemployed as a % of the working age population

⁶⁹² *Proposal Document*, paragraph 6.9-6.17, et alibi

⁶⁹³ Letter to CAP dated 22/6/2006

Consideration

505. This location offers an interesting opportunity to test social impact in a city region undergoing considerable regeneration and change.
506. Because of its proximity to the main regional centre of Birmingham, Wolverhampton offers limited accommodation for staying visitors who tend to be in the business sector.⁶⁹⁴
507. Good progress has been made in developing an approach to managing potential social aspects.⁶⁹⁵ The Council is very sensitive to the potential negative social impacts and its responsibility to ensure that such impacts are minimised, so that the social benefits envisaged from a new casino development do indeed outweigh any social costs. Moreover, the council has consulted widely in establishing a gambling policy.⁶⁹⁶
508. Whether regional policy context of the racecourse proposal is truly supportive (as claimed by the council)⁶⁹⁷ could well depend on detailed planning considerations that are well outside our remit. There is currently a planning problem concerning the expansion of the racecourse facilities – planning permission was denied by the Secretary of State primarily on green belt grounds but also on town centre vitality policy and related development plan grounds,⁶⁹⁸ but the owners are confident of the success of a revised submission.⁶⁹⁹
509. There is evidence of market interest in the form of the novel “racino” concept combining racecourse and casino facilities.⁷⁰⁰
510. The proposal is supported by a petition of 660 signatories in support of the expansion of the racecourse and the proposal has been the subject of a number of consultation exercises.⁷⁰¹
511. Although a question mark about planning permission stands over the racecourse proposal, the proposal generally is a sound one. Wolverhampton well satisfies all our criteria and if the casino happens to end up at the racecourse it would add to its uniqueness and provide an interesting and unusual social impact test. If not, we return to the fact that our criteria are about an area, not a site. That is the focus of our consideration. While Wolverhampton’s is a good proposal, it competes better in the field of small rather than large casinos.

⁶⁹⁴ *Proposal Document*, paragraphs 2.13 & 2.14

⁶⁹⁵ *Response to Additional Questions*, p.1

⁶⁹⁶ *Response to Additional Questions*, pp. 1-3

⁶⁹⁷ *Response to Additional Questions*, p.10

⁶⁹⁸ Decision letter dated 5 July 2005, ref. APP/D4635/V/04?1149412

⁶⁹⁹ *Proposal Document*, paragraph 1.8

⁷⁰⁰ *Response to Additional Questions* p.4

⁷⁰¹ *Supplementary Submission*, August 2006, paragraphs 4.1-4.4

Chapter 9: The regional casino

Conclusions

512. All of the seven shortlisted proposals that we examined further had their merits in their own way, could be a good test of social impact, are in need of, and could benefit from regeneration, and showed evidence of willingness to license. However our duty was to choose only one area that best met our criteria.
513. We do not think **Blackpool's** proposal would represent the best test of social impact for the regional casino because most of the social effects would be exported. While it is clear that Blackpool is in need of regeneration, in our view the regeneration benefits of the proposal before us are unproven and more limited geographically than other proposals. If we thought it would fulfil all that is claimed for it, that is to turn round the fortunes of Blackpool, it could be a winner. But we do not think that a regional casino on its own would effect the transformation sought locally, nor optimise the wider regeneration through regional and national economic growth. While we note that willingness to license is high, in the round we do not regard this as the best proposal before us.
514. **Cardiff** would offer a reasonable pilot for testing social impact and there is evidence that they would be able to mitigate any adverse social effects. We also note that there is clear evidence of willingness to license. However in terms of regeneration needs Cardiff's is not the strongest proposal before us, and we note that, while a contribution would undoubtedly be made to local employment opportunities, the regeneration benefits are largely concentrated around the International Sports Village.
515. **Glasgow** offers a generally good prospect as a place for testing social impact. Glasgow has a good track record in dealing with existing casinos and getting people into work. However, despite continuing regeneration needs we are not satisfied that the proposal would do as much to alleviate them as in other proposals. While we would expect the issue of a licence were that to become permissible, we do not note the wider enthusiasm for the proposed casino that we find elsewhere.
516. In an area in need of social and economic regeneration (though by no means the worst of the areas before us), the strength of **Greenwich's** tourism potential and catchment area is likely to maximise investment and so jobs offered in the casino. In terms of offering jobs to the local community, local people would benefit. Greenwich's proposal has strong regional support. However, our view is that the proposal suffers from uncertain additionality as regards regeneration benefits in general and the proposal to develop a casino in Greenwich is unconvincing as to offering the best possible location in which to test social impact.
517. In every respect we are extremely impressed by **Manchester's** proposal, which offers great promise. We found that the proposal had a unique formula to offer which served to set it apart from the others presented to us in terms of the full range of our specific

remitted criteria of best test of social impact, regeneration need and benefits and willingness to license. Manchester represents a good place to test social impact, and the council's consultations with other local authorities and relevant bodies gave us confidence on that. Manchester has a catchment area for a casino second only to that of London, and it is an area in need of regeneration at least as much as any of the others we observed – indeed, the city has the greatest need in terms of multiple deprivation of all the proposals before us. We are impressed that the council's plan has been developed, and is proposed to be taken forward, in close consultation with the communities that would benefit from it. At the same time Manchester, as one of England's eight "Core Cities" and as one of the cities in the Northern Way, has a pivotal role in the regeneration of Northern England. In our view the proposal presents the most complete package in terms of meeting our remitted criteria.

518. Whilst **Newcastle's** is a sound proposal in terms of best test of social impact and regeneration need, the evidence to our mind suggests that the regeneration needs and the likely regeneration benefits that the proposal would bring are not as strong as elsewhere.
519. **Sheffield** would be a good place in which to test social impact. The council appears sound as regards dealing with social problems, and their proposal is well supported regionally. Much thought has been given to potential community benefits. However while there remains a strong regeneration need in places like the Lower Don Valley, such has been the success of the city generally in achieving regeneration to date that it remains in lesser regeneration need than others. We also believe that Sheffield's location, catchment and accessibility would not optimise the potential regeneration benefits compared with some of the other proposals before us.

Recommendation

520. After considering all the relevant evidence against our remitted criteria, we recommend that the **City of Manchester** should be the area to be selected for the licensing of the one regional casino to be permitted by the 2005 Act.

Chapter 10: The large and small casinos

Conclusions

521. All of the 29 shortlisted proposals for large and small casinos that we examined further had their merits in their own way and could be a good test of social impact, had regeneration needs and could benefit from regeneration, and showed evidence of willingness to license. However our duty was to choose only eight areas in each of the large and small categories. In selecting the eight in each category, we had two sets of considerations to balance:

- the intrinsic merits of each proposal, having regard to our remitted criteria related to test of social impact, regeneration needs and benefits and willingness to license; and also,
- the need to select a good range of types and a good spread of areas across Britain.

522. In selecting a good range of types and a good spread of areas we considered the whole spectrum presented by all three categories of casino, including Manchester, as representing an inner city/city conurbation location in the North West of England. So, for example, we had to choose, on merit, between seaside resorts in the South West or between city conurbation locations in the West Midlands.

523. Our preferred distribution is illustrated by the map at page 10 accompanying our summary on page 8.

524. Our recommendations below are set out in alphabetical order of place name and should not be taken as indicating a ranking.

Recommendations (large casinos)

525. We recommend the following areas for the licensing of the eight large casinos to be permitted by the Act:

- Borough of Great Yarmouth
- City of Kingston-upon-Hull
- City of Leeds
- Borough of Middlesbrough
- City of Milton Keynes
- London Borough of Newham
- Borough of Solihull
- City of Southampton

Recommendations (small casinos)

526. We recommend the following areas for the licensing of the eight small casinos to be permitted by the Act:

- Bath and North East Somerset District
- Dumfries and Galloway District
- East Lindsey District
- Borough of Luton
- Borough of Scarborough
- County Borough of Swansea
- Borough of Torbay
- Metropolitan Borough of Wolverhampton

Annex A: Personal profiles of Panel members

Professor Stephen Crow CB

Stephen Crow is an eminent practitioner of Statutory Planning, having held one of its highest offices in Britain as Chief Planning Inspector (1988-1994) and Chief Executive (1992-1994) at the Planning Inspectorate. From 1995 until 1999 he was the Independent Planning Inspector for the Isle of Man, and in 1998-1999 he chaired the Public Examination of the draft Regional Planning Guidance for SE England, for the Office of the Deputy Prime Minister. He has a continuing role as Honorary Professor of Town & Country Planning Practice at the School of Urban and Regional Planning, Cardiff University, beginning in 1995. He has experience of all aspects of appeal and quasi-judicial processes relating to statutory planning, including examinations in public.

Christopher Collison

Chris Collison is an independent planning and regeneration advisor with experience of working in Scotland, the Midlands and in London. He is a qualified professional in the fields of Town Planning, Economic Development and Historic Building Conservation. He has served as a member of the Co-ordinating Group of the Joint Planning Authorities Team for the London 2012 Olympic and Paralympic Games and was a member of the National Coalfields Taskforce. He has experience of Regional Planning and Regional Economic Strategy work and has been a member of inward investment and infrastructure groups working at regional and sub-regional levels. He chaired the North Derbyshire and North Nottinghamshire Sports Action Zone. Chris has held several Chief Officer posts in Local Government. He has expertise in the analysis of deprivation and areas suffering economic decline, and has played a leading role in successful regeneration and renewal programmes.

James Froomberg

Since 2003 James Froomberg has been Commercial Director at British Waterways, a publicly-owned corporation responsible for the country's 2000-mile network of rivers and canals. His role is to lead the development of a range of businesses and Public-Private Partnerships that generate a positive social and economic impact upon the communities served by the network, as well as income for British Waterways. He was Director of Corporate Development at Wembley plc from 1999 to 2003, building up racing and gaming businesses here and in the USA. He was previously a Partner with KPMG, leading on leisure, tourism and property development consulting.

Neil Mundy

Neil Mundy is a Chartered Public Finance Accountant with over twenty years' experience in regeneration and was Director of Integration, and Director of Finance and Corporate Services, at ONE NorthEast Regional Development Agency during the period 1999 to 2004. He was Director of Finance and Deputy Chief Executive of Tyne & Wear Development Corporation from 1992 and, at the end of a successful period of operation, was responsible then as Chief Executive for the Corporation's exit strategy, leading to its dissolution in 1998. His earlier career included management consultancy, specialising in Urban Renewal with KMG Thomson McLintock (now KPMG), and in local government finance with the London Borough of Brent. He is currently a Non-Executive Director of the Port of Tyne Authority and of Northumbria Healthcare Foundation Trust, and is Chairman of the UK Microsystems and Nanotechnology Network Group.

Deep Sagar

Deep Sagar's background combines management, economic and social development, consultancy and analysis. He worked for over 15 years in senior management for multinationals like Unilever Bestfoods and Coca-Cola internationally. More recently he has been a management consultant, working more closely with the public sector. He has expertise in the not-for-profit and regulated sectors as well. Presently his roles include being chairman of Turnstone Support and non-executive director of Communities Scotland and HM Inspectorate of Education.

Annex B: Independent Casino Advisory Panel: Terms of reference

The Secretary of State will ask the Casino Advisory Panel to assist her in the exercise of her order making powers under Section 175(4) of the Gambling Act 2005 to determine the geographical distribution of casino premises licences. For this purpose, she is required to specify in the order which local authorities should be permitted to issue casino premises licences of a specified kind, and how many of each type of casino premises licence each specified local authority should be permitted to issue.

The criteria against which the Panel will assess these submissions were set out in the Government's national policy statement on casinos published on 16 December 2004. The primary consideration will be to ensure that locations provide the best possible test of social impact. Subject to this, the criteria will also be:

- to include areas in need of regeneration (as measured by employment and other social deprivation data) and which are likely to benefit in these terms from a new casino;
- to ensure that those areas selected are willing to license a new casino.

The Secretary of State has asked the Panel to make its recommendations to her by the end of 2006.

DCMS
August 2005

Annex C: Casinos: Statement of National Policy

1. This statement (was) issued on behalf of Her Majesty's Government (on 16 December 2004).
2. The Government's policy on casinos is based on the three broad objectives of the Gambling Bill:

- To protect children and other vulnerable people from harm;
- To prevent gambling being a source of crime or disorder and;
- To ensure that gambling is conducted in a fair and open way.

Britain has a low level of problem gambling compared to other countries (less than 1% of the population) and the Government is committed to maintaining this record. Casinos are already tightly regulated and have strict controls in place. The Gambling Bill will strengthen the existing safeguards. There are currently a number of regulations, however, which the Government believe are outdated. The 24-hour rule, the ban on advertising and the permitted areas rule unnecessarily restrict customer choice and discourage investment and economic regeneration.

3. The tourism and leisure industries are increasingly significant elements of the economy. Tourism alone accounts for 4.4% of our GDP. The Government believes that the casino proposals in the Bill, with its emphasis on increased regulation, have the potential to make a positive contribution to the success of these sectors. In addition Regional casinos, as major developments, offer clear potential for regeneration of areas across Britain. They will provide not just a range of gambling activities, but may include hotel accommodation, conference facilities, restaurants, bars, areas for live entertainment and other leisure attractions. The benefits of such a development could go much wider than the location of the casino itself. There are many parts of the country which could benefit from the regeneration that these kinds of leisure developments can offer.
4. The Government recognises, however, that the casino proposals in the Bill represent a significant change and we need to take a cautious approach in order to assess whether their introduction leads to an increase in problem gambling. The Government has taken the view that the risk of an increase in problem gambling will be reduced if a limit is imposed on the number of casinos. We have therefore decided to set an initial limit on the number of Regional, Large and Small casinos of 8 each. The identification of operators and locations for the new casinos will be subject to broadly the same arrangements in each case.
5. The Government believes that, in order properly to assess the impact of these new casinos, there needs to be a sufficient number of casinos in each category to allow the impacts to be assessed in a range of areas and types of location that might be suitable (including, for example, urban centres and seaside resorts across different parts of the Britain). A limit on Regional, Large and Small casinos of 8 each is consistent with this aim while at the same time ensuring that any risk of problem gambling is minimised.

The Government has decided to appoint an independent Advisory Panel to recommend the areas for the Regional, Large and Small casinos. Following the Panel's advice the Government will decide the areas where each of the new casinos may be licensed.

6. Once an assessment has been made of the impact on problem gambling of the limited number of new casinos, it will be easier to judge the continuing need for a limit. No earlier than three years after the award of the first premises licence, the Government will ask the Gambling Commission to advise on whether the introduction of the new types of casinos has led to an increase in problem gambling or is increasing that risk. We believe such a period is necessary to ensure a full assessment can be made of the impact of the new casinos. If the Government, on the basis of the Gambling Commission's advice decides to propose that more casinos may be licensed then the Order providing for this will need to be approved by Parliament. We will also want to assess, with the help of regional bodies, what the regeneration and other economic outcomes have been.
7. This policy statement sets out our policy on casinos in more detail below, including the role of the Advisory Panel in recommending areas for the new casinos and arrangements for casinos which already have a licence under the Gaming Act 1968. The proposals for casinos outlined here are for England, Scotland and Wales. Responsibility for the planning system in Scotland and Wales is for their respective devolved administrations. None of the proposals here will affect the ability of local authorities to refuse to have a new casino of any size category in their area.

The Advisory Panel on new casino locations

8. The Secretary of State for Culture, Media and Sport will appoint an independent Advisory Panel to advise her on the areas in which the new casinos should be located. The Panel will collectively have knowledge and expertise in a range of matters including planning, securing regeneration, tourism and addressing the social impacts of gambling. Clearly, all Panel members must be able to demonstrate independence from any potential interested parties and must have an appreciation of the need for impartiality.
9. In order to ensure that the impact of the new casinos can be assessed on the basis of a broad range of information and experience, the Advisory Panel will be asked to identify areas for the new casinos which will provide:
 - a good range of types of areas, and a good geographical spread of areas across Britain;
 - The Panel will also want to ensure that those areas selected are willing to license a new casino.

Subject to these criteria, the Panel will be asked to choose areas in need of economic development and regeneration (as measured by employment and other social deprivation factors) and likely to benefit in regeneration terms from a casino.

10. The Advisory Panel will invite views from interested parties. In taking forward its work it will in particular invite the Regional Planning Bodies in England to identify a list of broad locations for Regional casinos emerging from their work on the Regional Spatial Strategies. Before the Advisory Panel finalises its recommendations on areas for Regional casinos it will need to ensure that these areas are compatible with the broad locations identified in England in Regional Spatial Strategies or in any draft revisions of Regional Spatial Strategies before the First Secretary of State.
11. The Advisory Panel will be asked to offer Ministers a list of up to 8 recommended areas for each of the three categories of casino. The Secretary of State will consider the Panel's recommendations. After consulting the Scottish Executive and the Welsh Assembly Government, the Secretary of State will then decide which areas to designate.
12. The Panel will be able to begin its work in the course of 2006, taking account of views put forward to Regional Planning Bodies as they progress the preparation of revisions of Regional Spatial Strategies, and of local authorities as appropriate. We do not expect it to complete its work before the end of 2006.

Planning for casinos

13. In England, Regional Planning Bodies as part of their revision of Regional Spatial Strategies will need to consider possible broad locations for Regional casinos within their region. Their proposals will then feed into the recommendations of areas for the initial eight Regional casinos by the Advisory Panel. In revising their Regional Spatial Strategies, Regional Planning Bodies need to take into account national planning policy guidance. Planning Policy Guidance Note 6 "Planning for Town Centres and Retail Developments"/ draft Planning Policy Statement 6 "Planning for Town Centres", Planning Policy Guidance Note 13: "Transport" and the two joint statements already provide a comprehensive policy framework for casino development.
14. The Government does not consider that a separate national planning policy statement on casinos is required. However, it will consider whether there needs to be further clarification or development of its planning policy in respect of casinos in particular, in finalising PPS6.
15. For all three categories of casinos, the identification of specific sites will be for local planning authorities in their local development framework, having regard to national policy and the Regional Spatial Strategy. Local planning authorities will also be responsible for deciding applications for casino developments.
16. Operators will be required to apply for planning permission in the usual way and all applications will be considered on their merits in line with national and local planning policies. Applications may come forward at any stage. Decisions on whether they should be called in for decision by the First Secretary of State will be made in light of the Government's call-in policy and the particular circumstances of the case.
17. It will be for the devolved administrations to decide to what extent these considerations should apply to them.

The operating licence

18. The Gambling Commission will award operating licences to companies on the basis of the usual licensing criteria, but incorporating an additionally stringent test of social responsibility to reflect the fact that Regional, Large and Small casinos will present hitherto untested risks of social harm. Therefore, operators will need to demonstrate a commitment to: ensuring effective measures for reducing the risks posed to vulnerable people by casino gambling products and the environment in which they are supplied, and making available information, advice and assistance to people using the casino who may be affected by problems related to gambling. The Commission will take account of the fact that greater commitment and resources is likely to be needed in the case of Regional casinos because of the greater risk they pose, particularly because of the availability of Category A machines. There will be no limit on the number of operating licences that may be granted.

The premises licence

19. A local licensing authority will only be able to award a casino premises licence if one has been identified for its area. The process for awarding a premises licence will be open to all operators. It will have two stages. The first stage will be a regulatory test to ensure that all proposals satisfy the regulatory premises licensing requirements already in the Bill. The second stage will be triggered where there are more applications for casino premises licences than the local licensing authority is permitted to grant.
20. The second stage of the process will be a competition held by the local authority on the wider casino proposal. We will consult with the Local Government Association and others on how the competition should be conducted. The competition could be judged on a wide range of issues, reflecting the issues that are important in the local area, local concerns and priorities. These may include, for example, employment and regeneration potential, the design of the proposed development, financial commitments by the developer to local projects, location, range of facilities and other matters. The local authority may wish to provide an opportunity for consultation with local people. The local authority would set out its priorities and concerns in a set of objective key considerations and it will then invite operators to submit entries to the competition. The eventual winner of the competition will be eligible for a full premises licence once he has obtained planning permission and the casino has been built.
21. The operator will therefore need to have an operating licence, a premises licence and planning permission. The planning permission is likely to be subject to a planning obligation.
22. The premises licensing process and the planning consent process will need to be conducted taking account of the need to clearly separate the licensing and planning functions. ODPM and DCMS will issue guidance to local authorities on the propriety issues surrounding these processes. The fact that an applicant's proposal may be the preferred option in the competition will not guarantee planning permission. Once planning permission has been granted and the casino has been built, the operator will

be able to apply for a full premises licence, which he could expect to obtain provided there has been no material change in the proposals since the competition.

Casinos which already have a licence under the Gaming Act 1968

23. The arrangements described above for Regional, Large and Small casinos are aimed at minimising the risk of problem gambling from an increase in the number of casinos, particularly from a proliferation of high stake and high prize gaming machines. Existing casinos will be allowed to continue to operate, and to have the opportunity to compete for the new licences. But the Government does not believe it would be appropriate to allow them to have all the new casino entitlements in circumstances where a limit is imposed on the establishment of new casinos.
24. Accordingly, we propose that there will be no size requirements on existing casinos and they will not be subject to the ban on advertising and the 24-hour rule. They will, however, be restricted to their current gaming machine entitlement of 10 gaming machines of up to Category B and they will not be allowed to provide bingo or betting on real or virtual events.
25. Arrangements will be made to ensure that existing casino businesses can in the future be transferred to new owners and to new premises if the current premises for some reason become unavailable (such as end of lease or fire), so long as it is within the existing licensing area. A company operating a casino which already had a licence under the 1968 Act may apply for a Regional, Large or Small casino premises licence. If it is awarded one of them for an existing casino, then it will be able to operate it with all the new entitlements authorised by the new licence.

16 December 2004

Annex D: Framework Document

Introduction

1. The Gambling Act recently passed by Parliament will allow three new types of casinos to operate in Britain. One regional casino will be permitted, along with eight large and eight small casinos. The new casinos will be large-scale entertainment complexes, offering a range of gambling activities and non-gambling leisure facilities. Regional and large casinos have the potential to bring in major investment and economic regeneration to the areas where they are located.
2. This framework document is intended to augment the formal terms of reference of the Panel.

Aims and objectives

3. In order to ensure that the impact of the new casinos can be assessed on the basis of a broad range of information and experience, the Advisory Panel has been asked to identify areas for the new casinos which will provide:
 - a good range of types of areas; and,
 - a good geographical spread of areas across Britain.
4. The Panel will also ensure that those areas selected are willing to license a new casino. Subject to these criteria, the Panel has been asked to choose areas in need of economic development and regeneration (as measured by employment and other social deprivation factors) and likely to benefit in regeneration terms from a casino.

Guiding principles for the Panel

5. The overall guiding principles for the Panel are set out in the Casino Advisory Panel Code of Practice.

Operational Overview

(i) Panel membership

6. The Casino Advisory Panel will be led by a Chairman, Professor Stephen Crow CB who has been appointed by the Secretary of State following an open competition. The appointment is for a fixed term. He will be supported by 4 other members; Christopher Collison, James Froomberg, Neil Mundy and Deep Sagar, also appointed after an open competition.

(ii) Panel meetings

7. The Panel will meet regularly at a place convenient to the Panel members. There will be no set dates each month for meetings. The minutes of Panel meetings will be published on the Panel's website.

(iii) Secretariat

8. The Panel will have a Secretary to support it, provided by the sponsoring Department (DCMS). The Secretary will be based in DCMS and this will be the contact address for all correspondence with the Panel.
9. Secretariat support is provided by the Department but the Secretary will work directly to the Panel and the Chair will be responsible for developing and appraising the performance of the Secretary.
10. The Chair and Secretary will keep under review whether any additional secretariat support is required and will liaise as necessary with the Department.

(iv) Panel reports

11. The Panel will start work on 3rd October and will report by the end of 2006.
12. The Panel will also provide progress reports to the Secretary of State on a regular basis at key milestones during the period up to their final report. The milestones are expected to be as follows:
- 1) End January 2006
 - Scoping and research
 - Consultation with stakeholders
 - Requests of initial interest
 - 2a) End January 2006
 - Developing criteria
 - Detailing process
 - 2b) End March 2006
 - Submission of proposals
 - 3) Summer 2006
 - Examination and evaluating of proposals
 - 4) Mid December 2006
 - Consideration and reporting
13. The purpose of these reports will be to keep the Secretary of State in touch with the progress of the Panel, and to assure the Secretary of State that the work methods the Panel is adopting will result in robust and legally sustainable recommendations. The Panel's reports to the Secretary of State will be made public.

(v) Accountability framework

14. The Secretary of State for DCMS is answerable to Parliament on all aspects of the Panel's establishment and business.
15. Members of Parliament, Scottish Ministers, the National Assembly for Wales, Members of the European Parliament and the general public will be encouraged to write direct to the Chair of the Panel on any matters relating to its day-to-day operations.
16. The Chair will provide the Secretary of State, through the Secretary and departmental officials, with any information necessary to answer Parliamentary Questions or deal with any other Parliamentary business about matters relating to the Panel.
17. The Panel is wholly responsible for the task the Secretary of State has set. The Panel will operate independently from department, and will provide regular progress reports, through the Chair, to the Secretary of State as outlined above. The Chair is responsible to the Secretary of State for the effective operation of the Panel in accordance with this Framework Document, and for meeting its objectives within the resources allocated.

(vi) Transparency

18. The Secretary of State has asked the Panel to conduct its work with the utmost transparency. The Panel's working assumption will be that all papers it considers will be freely available to the public. These papers will include any submissions made to the Panel, as well as its own minutes of meetings and reports to the Secretary of State.

(vii) Day to day contact between the Panel and DCMS and other government departments

19. Day to day contact between the Panel and DCMS officials will be conducted through the Secretary. The Secretary will ensure that the Panel is kept informed of any central policy developments which may impact on the work of the Panel and will provide ad hoc information and progress reports as necessary to the department.
20. The primary contact for the Secretary in the Department will be David Fitzgerald, Head of Gaming and Lotteries, Gambling Division.
21. The primary contact for the Chairman of the Panel will be Andy McLellan, Head of Gambling Division.

(viii) Relationships with other bodies

22. The Government has asked the Panel to invite the views of interested parties when developing its recommendations. The Panel intends to consult as widely as possible in taking its work forward. It is important to note that, in formulating its recommendations, the Panel will only be able to take into account representations which it considers are relevant to specific remit that the Panel has been set.
23. The Secretary of the Panel will be responsible for handling all correspondence and enquiries relating to the work of the Panel, including its procedures, operations and the criteria it uses to develop its recommendations.

24. DCMS officials will continue to be responsible for any correspondence relating to the establishment and terms of reference of the Panel.
- (ix) Relationship with regional planning bodies in England*
25. In taking forward its work the Panel will in particular invite the Regional Planning Bodies in England to identify a list of broad locations for regional casinos emerging from their work on the Regional Spatial Strategies. Before the Panel finalises its recommendation on the area for the one regional casino permitted by the Act, if it is in England, it will need to ensure that this area is compatible with the broad locations identified in the appropriate Regional Spatial Strategy or in any draft revision of Regional Spatial Strategy before the First Secretary of State.
26. The Panel will also consult with appropriate bodies in Scotland and Wales on spatial strategy.
- (x) Relationship with other government departments and the Scottish and Welsh executives*
27. The Panel will be free to consult other government departments and the Scottish and Welsh executives, and any other agencies or NDPBs sponsored by them, that it considers relevant to its role. It will be particularly important that the Panel consults departments and agencies with specialist expertise relevant to the role of the Panel.
28. Where the Panel consults a relevant body in England, it will be expected to consult the equivalent bodies in Scotland and Wales.
29. Any advice or views expressed by these other government departments or agencies will be without prejudice to the decisions that the Secretary of State will make under Section 175(4) of the Act, or to the process of consultation with Scottish Ministers and the National Assembly for Wales as required by that Section.
- (xi) Financial arrangements*
30. The work of the Panel will be wholly funded by DCMS. The Chair of the Panel will be responsible for ensuring the economic, efficient and effective use of resources provided to the Panel, for the propriety and regularity of its expenditure, and for ensuring that the requirements of Government Accounting are met.
31. The Secretary of the Panel will be responsible for ensuring that day to day financial controls are in place and operating effectively.
- (xii) Consultancy and research*
32. The Panel will be able, within its agreed budget limits, to draw on any expert support it considers necessary for formulating its recommendations to the Secretary of State. The Panel will be required to follow the normal DCMS procurement rules.

(xiii) Legal Arrangements

33. The Panel will require public law advice concerning the matters which they need to consider for the purposes of their remit, the nature of the evidence they should look at, and the procedures which they should adopt in obtaining evidence from interested parties. To ensure the Panel's independence from the Department, it has been agreed that its legal support should not be drawn from the Department's own legal team.

(xiv) Press matters

34. The Panel may require press handling assistance from time to time, particularly when the need arises to make something known to outside stakeholders (such as a call for expressions of interest). As with legal arrangements, to ensure the Panel's independence from the Department, the Panel's press support will not be drawn from the Department's Press Office.

(xv) Risk management

35. The Panel will follow normal procedures for assessing and dealing with risk. The Secretary to the Panel will be expected to inform the Department of any likely risk which may affect the objective or timescale of the project.

(xvi) Arrangement for changing framework document

36. The Secretary of State or the Chairman of the Casino Advisory Panel may propose modifications to the Framework document if these appear necessary in the light of experience or to take account of changed circumstances.

Signed:

Richard Caborn MP
Minister of State, Department for Culture, Media and Sport

Professor Stephen Crow
Chairman, Casino Advisory Panel

November 2005

Annex E: Call for proposals 31 January 2006

Introduction

Background

1. The Casino Advisory Panel ('the Panel') has the duty to advise the Secretary of State for Culture, Media and Sport on the locations for new casinos in Scotland, Wales and England. To assist the Panel in this duty, local authorities are invited to let the Panel know which of them wish to have one or more new casinos in their area, and the reasons why they think that their area is suitable, in order for the Panel to select the locations to recommend to the Secretary of State. This document sets out the background to this call for proposals, the process by which the Panel intends to evaluate them, and the areas of information that it particularly wishes to know about.
2. All proposals will be considered equally in an open and transparent way. At the same time it must be understood that the Panel's duty is to consider best locations and not merely evaluate the quality of proposals.
3. Further background details regarding the Panel, its activities, frequently asked questions, and latest news, can be found on the website: <http://www.culture.gov.uk/cap/index.htm>
4. The Secretary of State has asked the Panel to assist her in the exercise of her order making powers under section 175(4) of the Gambling Act 2005 to determine the geographical distribution of casino premises licences. For this purpose, she is required to specify in an order which licensing authorities should be permitted to issue casino premises licences of a specified kind, and how many of each type of casino premises licence each specified local authority (in Scotland, Licensing Board) should be permitted to issue. Section 175 (1) to (3) sets out the overall limits for casino premises licences as no more than one regional casino, eight large casinos and eight small casinos.
5. The Government expects that the regional casino will have a minimum total customer area of 5,000 m², and be permitted up to 1,250 Category A jackpot machines, which will be able to offer unlimited stakes and prizes. Large casinos will have a minimum total customer area of 1,500 m², and be permitted up to 150 Category B gaming machines, with a maximum jackpot of £4,000. Small casinos will have a minimum total customer area of 750m², and be permitted up to 80 Category B gaming machines, with a maximum jackpot of £4,000. The one regional and eight large casinos will be permitted to offer bingo, and all three categories will be permitted to offer betting.
6. The Government also expects that a regional casino will be a major development, offering clear potential for regeneration. It will provide not just a range of gambling activities, but may include hotel accommodation, conference facilities, restaurants, bars, areas for live entertainment and other leisure attractions, gambling activities and non-gambling leisure facilities. The Government believes that it will have the potential to bring in major investment and economic regeneration to the area where it is located.

Criteria for selection

7. The Panel’s task is to recommend to the Secretary of State the areas where the one regional casino and eight large and eight small casinos would best be located. The criteria against which the Panel will assess submitted proposals were set out in a national policy statement on casinos which was published by the Government on 16 December 2004. [NB: This statement was annexed and is given in this report at Annex C].
8. The Panel’s Terms of Reference also state that the primary consideration will be to ensure that locations satisfy the need for the best possible test of social impact. Subject to this, the criteria will also be:
 - to include areas in need of regeneration (as measured by employment and other social deprivation data) and which are likely to benefit in these terms from a new casino;
 - to ensure that those areas selected are willing to license a new casino.

Proposals

9. Proposals are invited from Licensing Authorities (as defined in Section 2 of the Act); that is, in England and Wales, specified local authorities and, in Scotland, Licensing Boards.
10. Makers of proposals should be aware that, following a letter from the Panel to all local authority chief executives in November 2005, seeking indications of initial interest, some 131 local authorities responded. Of these, 52 authorities said that they were not interested and 4 that they could not give an indication at the present time. Potential interest may be gauged from the following table.

Type of Casino	Number of expressions of interest
Regional (including indeterminate responses)	47

Process

11. The Panel will consider the information and material submitted by proposing authorities and may also seek such further and better information as it considers necessary. All proposals will be considered carefully against the Panel’s terms of reference and Government policy. Selected proposals for the regional casino will be considered through the medium of Examination in Public (EiP) as outlined in the project programme. The Panel will also consider representations from other individuals and organisations concerning the location of a casino in their area. The Panel may additionally seek information from any organisation or individual on matters that it considers are material to its decision making. Further details on the process will be published once the Panel has had an opportunity for early appreciation of proposals submitted.

12. The Panel is also seeking of its own initiative appropriate background material to the questions involved. On the basis of all relevant information obtained the Panel will select proposals to take forward for further examination and recommendation.

Confidentiality

13. All submitted material will be in the public domain, and therefore evidence of a confidential nature will not be accepted.

Timing

14. The Panel will expect all proposals to be with them by Friday 31st March 2006. It is important that this date be adhered to. Only in exceptional circumstances and for good reason will late proposals be accepted. This rule is made not only for the convenience of the Panel, but also so that others making proposals may become aware of potential competition.

Format, etc of Proposals

15. The Panel wishes it to be known that their view of the form of a good proposal is one that is concise, relevant and focused on providing sound evidence about the most important issues. Makers of proposals therefore should be guided by a target that their submitted statements should not exceed 20 pages of A4, excluding the cover sheet. References can be made to published material, however, sources of published information and statistical data must be clearly referenced and there should be no need for additional appendices attached. The Panel will ask for additional information if it is needed.

Information required

General information

16. General information should be submitted on the pro-forma cover sheet attached to include:
- Name of local authority
 - Contact name, address, telephone numbers, email and fax
 - Name and title of submitting Chief Officer
 - Statement of the basis of the application. Under this head, authorities making proposals should make it clear what their proposal is for. For example, they should say whether their proposal is for one or other of the types of casino to be located in their areas or for groupings of types of casinos.
17. Eight hard copies and eight CD-ROMs of proposals should be submitted.

Specific Information

18. Authorities making proposals are asked to submit information under each of the headings listed in the following sections below;

- Type of area
- Social Impact
- Need for regeneration
- Willingness to license
- Probability of implementation
- Regional Context
- Community benefits
- Unique characteristics

Type of Area

19. Your submission should include information on:

- the population base of the local authority area, e.g. size, socio-economic and ethnicity characteristics, levels of educational attainment
- the current levels of tourism in the area, including any recent trends or developments, as well as infrastructure for tourism such as hotels, other entertainment facilities and transport access, origin of tourists and overall vision for tourism
- local plans and strategies for the development of tourism, leisure or gambling in the area
- the principal needs of regeneration in the area
- anything in the area which would make it a good ground for the testing of social impact.

Social Impact

20. What do you consider the social impact of your proposal will be?

21. If your evaluation of some criteria are negative and some positive (for example economic and social criteria) how will you resolve this?

22. What do you say to those who claim that the effects of your proposals would have a negative impact on social cohesion and the sustainability of your communities?

The information supporting your response should include, where appropriate:

- Any recent assessments of the impact of existing gambling in your area on problem gambling, social cohesion and the sustainability of communities in such areas;
- Any policies or procedures in place, or planned, to counter any potential negative social impacts of gambling in your area or optimize any positive social cohesion, including current management arrangements, developer or operator contributions and approved budgets for these policies or procedures;

- Details of how you would test for changes in social impacts if a new casino was to be licensed;
- Comparable initiatives in place to manage social impacts from other activities;
- Existing and planned job creation and training programmes, which improve the skill of and benefit local people;
- Details of existing and planned relationships with relevant voluntary and public organisations which would support your social impact policies and activities.

Need for Regeneration

23. How do you expect your proposal to assist regeneration of your area and the wider area? Where appropriate, your response should include information as follows:

- Supporting information, including from relevant government bodies, regarding the regeneration and employment status and activity rate (male/female) of your area together with details on the timing and levels of public and private investment for this regeneration;
- Supporting details of the level of additional economic value that your proposal would create, including the anticipated incremental increase in GAVE (Gross Value Added) and employment;
- Are there parts of your area, the regeneration of which would particularly benefit from your proposal, and how would this come about?
- How and why do you expect that the “multiplier effect” of the additional economic activity to be created by your proposal would outweigh the potential leakage of money from the local economy?
- Any other regeneration outputs and outcomes you are seeking to achieve from the development of a new casino.

Willingness to license

24. Having regard to Section 166 of the Act, what strong evidence can you provide which demonstrates the willingness to license a casino in your area if it is selected? (In Scotland, this power will be exercised by the local licensing board). The information supporting your response should include, where appropriate:

- Council resolutions in favour and relevant supporting Council meeting minutes;
- Details of any local pre-existing polling or market research to establish the extent of support among the area’s population;
- Details of any local consultations;
- Resolutions of support by the Local Strategic Partnership;
- Relevant tourism or leisure strategies, or local plans which demonstrate the extent of consideration and commitment;
- Details, including contact details, and key issues raised in correspondence from any national or local organisations or individuals who have expressed either:

- support for a casino in your area, or objections and concerns that a new casino should not be licensed in your area, together with details of your engagement with such groups or individuals; or,
- points raised in your responses to them.

Probability of implementation

25. To enable the Panel to satisfy itself that, if selected, the proposal has a high probability of implementation, what evidence can you provide to demonstrate the overall feasibility of your proposals? The information supporting your response should include, where appropriate:

- A market demand analysis relating to both resident and tourist demand;
- Catchment area and customer base;
- Information on the criteria you would be using to identify appropriate and sustainable localities for the new casino;
- Existing and proposed transport infrastructure, so far as it would relate to your proposal;
- Statement of the current provision for gambling in your local authority area or nearby, including any recent trends or developments in this;
- The impact of competition on existing casinos (if any) and other leisure based activities;
- Potential critical mass effect of a cluster of casino and leisure based activities;
- Estimated overall investment potential analysed between public and private sector investment and if sufficiently advanced how that would be funded;
- Current level of investor interest;
- How would you anticipate gambling spend to change following the implementation of your proposal?

Regional and Local Context

26. The information supporting your response should outline the relevant policy context of Regional Spatial Strategies and sub regional policy areas and how they relate to the emerging Local Development Framework. This context should address any development strategies, policies and initiatives, inward investment proposals and regional economic strategies which are or would be relevant to the location of a new casino within a local authority area.

27. To what extent would identification of your area assist in achieving regional economic objectives for employment, skills and regeneration? In particular, in England, the consideration, policy position and attitude of the Regional Planning Body (Regional Assembly) toward your proposal should be requested at an early stage and noted.

Community benefits

28. In general terms, what community benefits does the authority expect to accrue from the licensing and town planning processes?

Unique characteristics

29. What outstanding characteristics of your proposal or area might differentiate it from similar proposals, so far as you know them? Please refer to any aspects of your proposal that you think are unique and which the Panel may reasonably take account of in reaching its decision.

Proposals should be sent to:

Mrs Jane Bransby
Secretary to the Casino Advisory Panel
DCMS
2-4 Cockspur Street
London SW1Y 5DH

Telephone No 0207 211 6453

Email: Jane.bransby@culture.gsi.gov.uk

Who is also the contact with the Panel for any clarification needed.

Annex F: List of proposals submitted and withdrawn

The Casino Advisory Panel announced on 4 April 2006 that 68 Local Authorities had submitted formal proposals to be considered by the Panel for one of the 17 new casino locations (1 regional, 8 large and 8 small):

Regional (27)

Blackpool; Brent*; Cardiff; Chesterfield; Coventry; Dartford*; Dudley; Glasgow; Great Yarmouth; Greenwich; Havering; Hull; Ipswich; Leeds; Manchester; Middlesbrough; Midlothian; Newcastle; Newport; Sheffield; Solihull; Southampton; Southend-on-Sea; Sunderland; Thurrock*; Wakefield; West Dunbartonshire.

Large & Small (41)

Bath & NE Somerset; Bournemouth; Bradford; Brighton & Hove; Cannock Chase; Canterbury*; Carlisle; Chelmsford; Chester; Derby; Dover; Dumfries & Galloway; East Lindsey; Falkirk; Harrogate; Hastings; Leicester; Luton; Maidstone; Mansfield; Milton Keynes; Newham; NE Lincolnshire; Peterborough; Renfrewshire; Restormel; St Helens; Salford; Scarborough; Sefton; Sevenoaks; Shepway; South Tyneside; Surrey Heath; Swansea; Swindon; Taunton Deane; Torbay; Westminster; Woking*; Wolverhampton.

A number of authorities have requested more than one casino and a number of authorities have also indicated that they would be prepared to license a lower category of casino if they don't secure their first choice.

* Brent, Canterbury, Dartford, Thurrock and Woking all withdrew their proposals at different times before the Panel's completion of its evaluation process.

Annex G: The first-stage sifting process

1. The objective of the sifting process was to reduce the initial 67 submissions (after Woking pulled out almost immediately) down to manageable numbers for further detailed examination with respect to the Panel's remitted criteria and Government policy generally.
2. The sifting was based on examination of proposals against the remitted criteria by considering each proposal against the information sought by the Panel in its "Call for Proposals."
3. The "Call for Proposals" was sent out to all local authorities at the end of January. Authorities making proposals were asked to submit information under each of the headings, or key lines of enquiry, listed in the following sections below;
 - a. Type of area
 - b. Social Impact
 - c. Need for regeneration
 - d. Willingness to license
 - e. Probability of implementation
 - f. Regional Context
 - g. Community benefits
 - h. Unique characteristics

Within each of these key lines of enquiry, specific types of information were requested. The headings and specific information were determined by the Panel as providing the information necessary to consider proposals fully against the remitted criteria, and of sufficient detail to allow comparisons between proposals in the same category of casino.

4. Each proposal was independently evaluated by two Panel members, based on a scoring matrix in which each proposal could be marked out of 10 in respect of each key line of enquiry. The Panel deemed that each key line of enquiry carried equal weighting to the others. The 67 proposals were divided randomly among the pairs subject to a proposal not falling to be determined by a Panel member with an actual or possible perceived conflict of interest. Prior to this, a sample of proposals was assessed independently by all 5 Panel members, in order to calibrate their appraisal approach, identify areas where individual members could interpret proposals differently, and test the robustness of the scoring matrix. Panel member pairs then liaised to agree an overall scoring against the key lines of enquiry. Where the two Panel members in any pairing differed materially in their views, a third Panel member appraised the proposal and then a moderated score based on that was used. The proposals were then ranked according to the moderated scores.
5. The proposals were then further discussed by the Panel, having due regard to any conflicts of interest. In this discussion detailed consideration was given to proposals

which were on the margin of being shortlisted and to any top-ranked proposal where the Panel members who had not appraised that proposal sought clarification for its ranking from those who had appraised it. The object of this exercise was to ensure that the results which were indicated by the raw scores were robust and accurately reflected the members' views of the relative strengths of the proposals.

6. In the event this process, combining as it did both moderated evaluation and the detailed discussion that followed, produced a short list of eight proposals for the one regional casino that could go forward to consultation and further examination.
7. A similar process was used in respect of proposals for large and small casinos, bearing in mind that some submissions contained a fall back position proposing one or more casinos in a smaller category. The Panel were mindful of the need to include an adequate size of field in respect of each of the large and small categories and the policy considerations requiring a geographical spread and a range of type of area. This led to a review of the shortlist compiled solely on the basis of scoring to reflect that. This process yielded a shortlist of 31 competing proposals for the eight large casinos and eight small casinos.

Annex H: List of documents submitted to the Casino Advisory Panel

1. Documents submitted by local authorities

Bath and North East Somerset

Bath and North East Somerset Council Casino Proposal - March 2006

'The Revival of Gaming in Bath': Bath and North East Somerset Council's bid for a Small Casino Licence for Bath - Supplementary Submission - August 2006

Map of Bath and North East Somerset proposed casino sites - August 2006

'The Revival of Gaming in Bath': Bath and North East Somerset Council's bid for a Small Casino Licence for Bath - Responses to Questions from the Casino Advisory Panel - September 2006

Blackpool

Proposal -Towards a World Class Resort Destination - March 2006

CD with end notes to proposal - March 2006

Short Statement on the merits of Blackpool's Case for a regional casino: Creating a World Class Destination, August 2006

Blackpool Council: Responses to further questions posed by CAP on 19 July, 14 August 2006, enclosing:

Blackpool Residents' Survey: Research Study conducted for Blackpool Council by IPSOS/MORI, May 2006

Pion Economics: Blackpool Casino Submission Economic Impact Assessment, Final Report, March 2006

Social Impact Assessment of a Regional Casino in Blackpool, Lancaster University, August 2006

Letters to CAP from Steve Weaver, Blackpool Council, 14 August 2006; 18 August 2006

Letter from Blackpool Council, 14 Sept 2006 enclosing:

Blackpool Populus Survey

Legal Advice from Christopher Katkowski QC, 6 Sept 2006

Letter from Blackpool Council, 29 September 2006 enclosing letters received by Blackpool Council from the following operators: Blackpool's Grosvenor Casino operators, Cuerden Leisure, Modus, AMEC and Carillion Richardson Partners

Email from Blackpool Council attaching two letters forwarded by ReBlackpool, sent by Paris Casino, 6 September 2006, and Stanley Casinos, 5 September 2006

Letter from Blackpool Council in response to Manchester City Council submission, 26 October 2006

Letter from Blackpool Council in response to Leaguenotion submission, 26 October 2006

Casino Advisory Panel Note (2): Cambridge Policy Consultants Review of Evidence for a Blackpool Regional Casino - Pion Economics Response

Bournemouth

Bournemouth Borough Council Casino Proposal - March 2006

Bournemouth Borough Council Statement of Gambling Policy: Draft Gambling Policy Document

Letter to CAP from Stephen Godsall, Bournemouth Borough Council, 23 June 2006

Bournemouth Borough Council's Response to Casino Advisory Panel Questions - September 2006

Bradford

City of Bradford Metropolitan District Council - Proposal to the Casino Advisory Panel, March 2006

Brent

Destination Wembley - The Case for a Regional Casino: A Submission by the London Borough of Brent to the Independent Casino Advisory Panel, March 2006

Casino Advisory Panel Examination in Public: Responses to Questions - London Borough of Brent, 14 August 2006, enclosing:

Economic Impact of a Casino in the Wembley Development Area: A Final Report for Brent Policy and Regeneration Unit - NERA Economic Consulting, 12 December 2005

Social Impact of a Regional Casino at Wembley - Draft Final Report - March 2006, EDAW

The London Plan: West London Sub-Regional Development Framework, May 2006

Casino Advisory Panel Examination in Public: Summary Statement - London Borough of Brent, August 2006

Letter to CAP from Gareth Daniel, Brent Council, 24 August 2006, enclosing:

Brent Council Executive Report from the Director of Policy & Regeneration: Wembley Regeneration and the Casino Advisory Panel, 23 August 2006

Brighton & Hove

Brighton and Hove City Council Casino Proposal - March 2006

Brighton and Hove City Council's Request for Additional Information - October 2006

Cannock Chase

Proposal for the Cannock Casino: Submission to the Casino Advisory Panel, March 2006

Letters to CAP from Cannock Chase Council, 18 April 2006; 28 April 2006

Canterbury

Proposals to the Casino Advisory Panel: the Submission of Canterbury City Council - 31 March 2006 Letter to CAP from Canterbury City Council, 21 September 2006

Cardiff

Cardiff Council Regional Casino Submission: An Exceptional Destination.... Ready to be Realised, March 2006

Summary Statement by Cardiff Council to the Casino Advisory Panel, August 2006

Letter to CAP from Tom Morgan, Cardiff City Council with proposed participants for EiP, 10 August 2006

Statement by Cardiff Council to the Casino Advisory Panel - Response to Specific Questions, August 2006, enclosing:

Appendix 1 - Aspers Casinos - Policies and Procedures for Promoting Socially Responsible Gambling, Including Aspers Casinos Responsible Gambling Programme and Customer Care Code of Conduct

Appendix 2 - Community Action for Responsible Gaming (CARG)

Appendix 3 - Cardiff Works Skills Vehicle: A Way Forward

Appendix 4 - The Enviro-Economic Model for Cardiff (E-EMC) - Draft-Final Report, August 2005

Appendix 5 - Cardiff Strategic Tourism Growth Area Action Plan - Final Report to Cardiff Council, January 2003

Selection of key aerial views and strategy for the Cardiff International Sports Village

Supplementary Statement by Cardiff Council to the Casino Advisory Panel, August 2006

Email to CAP from Tom Morgan, Cardiff City Council, 6 September 2006, attaching:

Welsh Assembly Government (July 2006) Consultation on Draft Revised Technical Advice Note 13 'Tourism'

Letter to CAP from Tom Morgan, Cardiff Council, 19 October 2006, enclosing:

Appendix 1: Photographs and Images

Appendix 2: Project Time-line

Appendix 3: Factual Documents, listing further documents

Cardiff brochure

Carlisle

Carlisle City Council: Proposal to the Casino Advisory Panel - March 2006

Chelmsford

Chelmsford Borough Council Casino Proposal - March 2006

Chelmsford Borough Council Response to Additional Questions from the Casino Advisory Panel - September 2006

Chester

Chester City Council Proposal for Licensing "Small Casino" - March 2006

Chesterfield

Chesterfield Borough Council Casino Proposal - March 2006

Letter to CAP from John Wrightson, Chesterfield Borough Council, 27 June 2006

Chesterfield Casino License Application: Further Submission - August 2006

Letter to Chesterfield Borough Council from The Methodist Church Chesterfield Circuit, 30 March 2006, enclosing:

A table showing public opinions on aspects of gambling: the reported headline results of two opinion polls conducted in 2003;

Letter to Reverend Webb, Chesterfield Circuit, from Chesterfield Borough Council, 20 April 2006

Chesterfield Borough Council's Response to Casino Advisory Panel Questions - November 2006

Coventry

The UK's First Regional Casino Pilot 'Coventry: The Natural Choice'. A Submission to the Casino Advisory Panel by Coventry City Council, 31 March 2006

Letters to CAP from Councillor Ken Taylor, Coventry City Council, 25 April 2006; 25 May 2006

Email to CAP from Coventry City Council, 12 June 2006

Letter to CAP from Coventry City Council, 21 June 2006

Letters to Treasury Solicitors from Pinsent Mason, 19 July 2006; 27 July 2006; 4 August 2006; 14 August 2006

The UK's First Regional Casino Pilot 'Coventry: The Natural Choice'. Further Submission to the Casino Advisory Panel by Coventry City Council, 14 August 2006

Letters to CAP from John McGuigan, Coventry City Council, 23 August 2006; 29 September 2006

Dartford

Dartford Borough Council Casino Application - March 2006

Letter to CAP from Dartford Borough Council, 27 June 2006 enclosing Cabinet Report for discussion at meeting on 10 July 2006

Letter to CAP from Dartford Borough Council, 8 August 2006

Derby

Proposal to the Casino Advisory Panel for a Large Casino in Derby - 28 March 2006

Letter to CAP from Derby City Council, 24 April 2006

Dover

Proposal for Casino Consideration from Dover District Council - March 2006

Dudley

Dudley Metropolitan Borough Council Casino Proposal - March 2006

Brierley Hill - Merry Hill Casino Proposal; Further evidence submitted to the Casino Advisory Panel - August 2006

Dudley Council's Response to Casino Advisory Panel Questions - September 2006

Brierley Hill Physical Regeneration Implementation Strategy

Dumfries & Galloway

Stranraer and Loch Ryan Waterfront Redevelopment: Casino Proposal - March 2006

Letter to CAP from Thomas Sloan, Dumfries & Galloway Council, 11 May 2006

Letter to CAP from Tony Fitzpatrick, Dumfries & Galloway Council, 29 June 2006

Letter to CAP from Dumfries & Galloway Council, 6 July 2006, enclosing a representation from Jim Figgis, 17 June 2006

Letter to CAP from Piotr Lewicki, Dumfries & Galloway Council, 11 July 2006, enclosing letter from Dumfries & Galloway Constabulary to Dumfries & Galloway Council, 30 June 2006

Letter to CAP from Alex Haswell, Dumfries & Galloway Council, 10 August 2006, enclosing Stranraer and Loch Ryan Waterfront Regeneration Programme - Casino Proposal: Recent Developments - August 2006

Casino Advisory Panel: Further Information (Dumfries and Galloway Casino Licence Bid), 29 September 2006

Letter to CAP from Tony Fitzpatrick, Dumfries & Galloway Council, 21 November 2006, enclosing letter to Dumfries & Galloway Council from Scottish Enterprise, 9 November 2006

East Lindsey

A New Sense of Place: Proposal for a small casino and leisure complex on the Lincolnshire Coast - March 2006

Letter to CAP from Nigel Howells, East Lindsey District Council, 18 July 2006

A New Sense of Place: Supplementary Information to support East Lindsey District Council's Proposal for a small casino and leisure complex on the Lincolnshire Coast - August 2006

Responses to Questions posed by the Casino Advisory Panel in relation to East Lindsey District Council's proposal for a small casino and leisure complex on the Lincolnshire Coast - September 2006

Falkirk

Falkirk Council Submission for a Casino License - March 2006

Glasgow

Regional Casino: The Case for Glasgow - Formal Bid Submission, March 2006

Glasgow Regional Casino Bid Document 2006

Letter to CAP from Steve Inch, Glasgow City Council, 29 June 2006, enclosing a letter from Scottish Enterprise addressed to Glasgow City Council, 23 June 2006

Letter from Steve Inch, Glasgow City Council, enclosing contact details and statements for those wishing to participate in the Glasgow Examination in Public and 1500 word statement 'EiP Opening Statement' - 10 August 2006

Letter from Councillor Hanzala Malik JP, Glasgow & Clyde Valley Structure Plan Joint Committee to Councillor Steven Purcell, 10 August 2006

Glasgow City Council's Response to Selected Matters - August 2006

Great Yarmouth

Great Yarmouth Borough Council Regional/Resort Casino Proposal - March 2006
 Great Yarmouth Borough Council: Additional Information for the Casino Advisory Panel - August 2006
 Great Yarmouth Casino: Response to Casino Advisory Panel Supplementary Questions - October 2006

Greenwich

'Delivering Economic Regeneration for Greenwich and The Thames Gateway: Proposal for a Regional Casino in Greenwich' - Submission to the Casino Advisory Panel - March 2006
 Letters forwarded to CAP by Greenwich Council:

- Geoff Pine, Greenwich Community College, 1 March 2006
- Bob Harris, TourEast London, 8 March 2006
- Marc Hume, The University of Greenwich, 10 March 2006
- Gavin Henderson, Trinity Laban, 13 March 2006
- David Main, South London Business, 13 March 2006
- James Bidwell, Visit London, 17 March 2006
- Tim Barnes, Greenwich Society, 18 March 2006
- Richard Cook, The Salvation Army: Deptford Corps, 21 March 2006
- Prof. Robin Baker OBE, Ravensbourne College of Design and Communication, 22 March 2006
- Sir Bob Scott, Greenwich Peninsula Partnership, 29 March 2006
- Eric Sorenson, Thames Gateway London Partnership, 30 March 2006
- 'Firepower', The Royal Artillery Museum, 31 March 2006
- Duncan Wilson, Maritime Greenwich World Heritage Site, 31 March 2006
- Manny Lewis, London Development Agency, 5 April 2006

Letter to CAP from Frances Dolan, Greenwich Council, 12 July 2006
 Letters to CAP from Councillor Chris Roberts, London Borough of Greenwich, 28 July 2006; 9 August 2006
 Letter to CAP from London Borough of Greenwich, 10 August 2006, enclosing:

- The Case for a Regional Casino in Greenwich: Short Statement for the Casino Advisory Panel - 10 August 2006;

Attachments to the statement:

- Council Motion 26 July 2006; Greenwich Peninsula Chaplaincy News July 2006; Draft Terms of Reference for Greenwich Multi Agency Group; The Case for a Regional Casino in Greenwich: Council's suggested participants for the Examination in Public on 30th August 2006

Responses to questions raised by the Casino Advisory Panel, 14 August 2006, enclosing:

- Letter from Marriott International Inc. to AEG, 4 August 2006, referred to in responses;
- Letter from Turner & Townsend to Kerzner International Ltd, 9 August 2006, referred to in responses;
- Floorplan of O2 Arena with casino elements

Letter to CAP from Barbara Holland, Greenwich Council, 29 August 2006
 Letter to CAP from Barbara Holland, Greenwich Council, 14 September 2006, enclosing:

- Greenwich: a place to visit - Tourism Strategy 2004-2010;
- Information on visitor numbers and investment in the Maritime Greenwich World Heritage Site;
- Supporting evidence for casino job numbers;
- 2 S106 agreements: MDL S106 Agreement and the Royal Arsenal (Warren Lane) S106 Agreement.

Letter to CAP from Mary Ney, Greenwich Council, 16 October 2006

Harrogate

Casinos: The Call for Proposals March 2006 - the Case for Harrogate

Hastings

Hastings Borough Council Casino Proposal - March 2006

Hastings Borough Council Supplementary Submission to the Casino Advisory Panel - 14 August 2006

Hastings Borough Council - responses to questions from CAP, 29 September 2006

Havering

Thames Gateway Regional Casino and Entertainment Centre: London Borough of Havering Casino Proposal - March 2006

Letters to CAP from Stephen Evans, London Borough of Havering, 26 May 2006; 31 May 2006; 9 June 2006; 23 June 2006

Letter to CAP from Stephen Evans, London Borough of Havering, 27 June 2006, enclosing Stakeholder Support for Havering's Regional Casino Proposal and Proposals by Sun International and Development Securities for the Thames Gateway Regional Casino and Entertainment Centre at Rainham in the London Borough of Havering

Letters to CAP from Christine Dooley, London Borough of Havering, 29 June 2006; 17 August 2006

Further Submission to the Casino Advisory Panel by the London Borough of Havering - August 2006

Letter to CAP from Sun International, 3 August 2006; 14 August 2006

Letter to Treasury Solicitors from London Borough of Havering Legal Services, 24 August 2006, enclosing Judicial Review papers

Letter to Treasury Solicitors from London Borough of Havering Legal Services, 11 October 2006

Hull

Hull City Council: Independent Casino Advisory Panel Submission - March 2006

Hull City Council: Further Evidence regarding the development of a large casino - August 2006

Hull City Council Casino Advisory Submission: Response to Questions - October 2006

Ipswich

Ipswich Borough Council Casino Proposal - March 2006

Leeds

Leeds City Council: Regional Casino Proposal - March 2006

Letter to CAP from Colin Mawhinney, Leeds City Council, 11 April 2006

Letter to CAP from Leeds City Council, signed by Councillor M Harris, Councillor K Wakefield, Councillor A Carter and Councillor D Blackburn, 29 June 2006

Letter to CAP from Councillor Andrew Carter, Leeds City Council, 7 June 2006 enclosing:

Casino Development - An Assessment of the Market and Implications, March 2005 (Ernst and Young/ Yorkshire Forward)

Leeds Regional Casino Proposal: Supplementary Information - August 2006

Leeds City Council Response to Casino Advisory Panel Questions: Large Casino, October 2006, enclosing:

Draft Summary Paper of the Potential Economic, Health and Social Impacts of Casino-based gambling, 22 September 2006;

Consultation on the draft statement of gambling policy - September 2006

Draft Leeds Statement of gambling policy

Leicester

Leicester City Council Casino Proposal - March 2006

Additional Submission by Leicester City Council - August 2006

Letters forwarded to CAP by Leicester City Council:

Letter to Leicester City Council from Dermot Breen, Leicestershire Chamber of Commerce, 19 June 2006

Letter to Leicester City Council from Penny Coates, Nottingham East Midlands Airport, 8 June 2006

Leicester City Council's Reply to Additional Questions from the CAP - September 2006

Luton

Luton Borough Council Casino Proposal - March 2006

Letter to CAP from Colin Chick, Luton Borough Council, 29 June 2006, enclosing correspondence received from casino operators

Letter to CAP from Councillor David Franks, 29 September 2006

Luton Borough Council: Answers to Supplementary Questions, October 2006

Maidstone

Maidstone Borough Council Casino Proposal - March 2006

Letter to CAP from Maidstone Borough Council, 8 May 2006, enclosing petitions submitted to the council by the Salvation Army and the Loose Baptist Church containing 236 signatures

Manchester

A Proposal to License a Regional Casino at Sportcity, East Manchester - March 06

Letters to CAP from Manchester City Council, 13 June 2006; 26 July 2006

Manchester City Council: Statement to the Casino Advisory Panel - August 2006

Letter to CAP from Manchester City Council with suggested participants for Manchester EiP, 10 August 2006

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Figure 3: Public Transport Catchment
Figure 4: Current Landuse impact (residential)
Figure 5: Current Landuse impact (retail)
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Appendix 2 - Letter from Sheffield and Manchester City Council's to Richard Caborn MP on the location criteria for regional casino, 16 December 2005

Appendix 3 - Letter from Sheffield City Council to Yorkshire Forward, 1 March 2006

Appendix 4 - Discussion Paper: Evaluation - Criteria for Evaluating Proposals for a Regional Casino License within the City of Sheffield

Appendix 5 - National Centre for the Study of Gambling: Problem Gambling Numbers Down, July 2006

Appendix 6 - DWP 'Cities Strategy' Case Study: Supply/Demand Side

Appendix 7 - Technical Assumptions - Pricewaterhouse Coopers, 2006

Appendix 8 - Ernst and Young Casino Report

Appendix 9 - Regional Casino in Sheffield: Economic Impact. Pricewaterhouse Coopers, 2006

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 Simon Birch, The West of England Partnership, 28 June 2006
 Richard Hall, Zenith International, 26 June 2006
 Theresa McDermott, Bath Chamber of Commerce, 26 June 2006
 Theresa McDermott, Bath Tourism Plus, 26 June 2006
 Peter Rollins, Thermae Bath Spa, 27 June 2006
 Colin Skellett, Business Initiative for Bath and NE Somerset, 20 June 2006

Blackpool

Cathy Adams, 10 August 2006
 Sue Arthur, 6 August 2006
 John Barnett MBE DL, 3 July 2006
 Carol Linda Bate, 8 August 2006
 Councillor Steven Bate, 13 January 2006; 21 February 2006; 12 April 2006; 10 August 2006;
 Statement submitted at EIP, 12 September 2006
 Ephraim Bell, 2 August 2006
 Mike Bentley, The Continental Hotel, no date provided
 Bruce Bristow, no date provided
 Anthony Brooke, 7 August 2006
 Stephen Brookes MBE, 7 August 2006
 Philip Brown, Blackpool Premier Holiday Association, 28 June 2006
 Phillip Brown, Holmsdale Hotel, 10 August 2006
 Steve Burd, Blackpool Transport Services Ltd, 6 June 2006
 David E Cam, Pleasure Beach, 9 August 2006; 24 August 2006; 14 September 2006
 J E Carr, Preston City Council, 22 March 2006; 30 August 2006
 Pat Champion, 2 August 2006
 David T Chapman, 15 September 2006
 Lynn Cole, Blackpool Combined Association, 9 August 2006
 Councillor John Collins, Councillor Peter Goldsworthy, Councillor Howard Gore, P Kuit; City
 Authorities of Preston, South Ribble and Chorley, 23 June 2006
 Karl Conlon-Parr, 1 August 2006
 Annie de Vree, 8 August 2006
 Jamie Dixon, 10 August 2006
 F Earnshaw, 7 July 2006; 6 June 2006; 2 August 2006; 31 August 2006
 Michael Edwards, 9 August 2006
 Michael Edwards, Foxhall Village Regeneration Association Ltd, 5 April 2006
 Derek Ellershaw; Blackpool Hotel & Guesthouse Association, 15 May 2006
 Jeff Ennis MP, MP for Barnsley East & Mexborough, 9 May 2006
 Roger Etchells, Roger Etchells Chartered Surveyors, 7 September 2006
 Lord Faulkner of Worcester, 7 May 2006
 Bernard Fawl, 10 August 2006
 Feathers Hotel Blackpool, 6 August 2006
 Neill Fraser, 9 August 2006
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 Stuart Furnival, Blackpool Methodist Church, 7 August 2006
 Dick Gillingham, 7 August 2006
 Alison Gilmore, Imperial Hotel, 9 August 2006
 G W Girt, 1 August 2006
 Clare Gorst, 30 August 2006

Paul Haigh, 10 August 2006
Professor Sir Peter Hall, ReBlackpool, 28 June 2006; 8 August 2006
Peter Hampson, British Resorts and Destinations Association, 11 July 2006;
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Casey Harwood, 8 August 2006
Beryl Head, 1 August 2006
Craig Hemmings, Leisure Parcs, 9 August 2006; 5 September 2006
Robert Hill, 1 August 2006
John Holt, Blackpool Town Centre BID, 2 August 2006
Joan Humble MP, MP for Blackpool North & Fleetwood Constituency, 8 August 2006
Christine Isherwood, 10 August 2006
Paul Isherwood, 9 August 2006
Lawrence James, Seafront Quality Management Board, 22 June 2006;
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Elaine and Colin Jones, 2 August 2006
Mark Kingsley, 22 September 2006
Peter Kuit; Preston City Council, 16 June 2006
Bill Lewtas, 6 July 2006
Harry Livesey, 3 August 2006
Lesley Lloyd, Lancashire and Blackpool Tourist Board, 20 June 2006
Derek Lodge, 2 August 2006
P S Lovatt, 4 August 2006
J Maddison, 9 August 2006
Gordon Marsden MP, MP for Blackpool South, 9 August 2006
Michael Marx, Development Securities plc, 9 August 2006; 1 September 2006
Michael Mason, Masons of Cleveley, 24 August 2006
Shirley Matthews, 3 August 2006
Rt Hon Lord McNally of Blackpool, 8 May 2006; 11 August 2006
Babs Murphy; North & Western Lancashire Centre of Commerce, 14 June 2006
Steve Myers, Stanley Casinos, 29 August 2006
Peter J Noblett, Nobletts, Chartered Surveyors, 10 August 2006
Mr C J Norton, 9 August 2006
Pat O'Connor, 1 August 2006; 28 August 2006
April O'Neill, 8 July 2006
Steve Palmer, Learning and Skills Council Lancashire, 17 May 2006
Karen Pennington, 8 August 2006
Debbie Porter, 10 August 2006
Dr John Pugh MP, MP for Southport, 6 September 2006
Libby Raper, Culture Northwest, 7 June 2006
Reg, Gamblers Anonymous, 7 August 2006
Craig Renilson, McDonald's Restaurants Ltd, 20 September 2006
Kathryn Revitt, Leisure Parcs, 31 August 2006
Bill Rogers, 7 August 2006; 3 November 2006
Phil Rowson, 1 August 2006
Herbert E Silcock, Silcock Leisure Group, 5 September 2006
Elaine Smith, Blackpool Civic Trust, 4 August 2006
John Sutcliffe, 4 August 2006
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Donald Thorley, 4 August 2006
John Topping, 2 August 2006
Andrew Tottenham, Harrah's Entertainment Inc, 9 October 2006

Karl Turner, Hilton Blackpool, 14 September 2006
 Jackie Vincent, 30 August 2006
 Jon Walton, Lancashire Jobcentre Plus, 28 June 2006
 Stephen Walton, 7 August 2006
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 Matt Watson, 30 August 2006
 Russ Weaver, Chief Superintendent Lancashire Constabulary, 2 August 2006
 Lucy Whigham, 9 August 2006
 James Whiteside, 29 August 2006
 Mike Wilkinson, Lancashire and Blackpool Tourist Board, 8 August 2006
 Dorothy Wills, 10 August 2006
 John Woodman, 7 August 2006
 David B Woods, David Maria Hair Design and The Face and Body Clinics, 9 August 2006
 Phillip Woodward, Fylde Borough Council, 5 September 2006
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Damian Aspinall, Aspers, 27 June 2006
 Malcolm Bell, South West Tourism, 26 June 2006
 John Bowle, Premier Exhibitions & Events, 26 June 2006
 Mark Broadley, Select Security & Event Services Limited, 28 June 2006
 I D Cambrook, Bournemouth, Dorset and Poole Economic Partnership Limited,
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 Graeme Gordon, Internet for Business Ltd, 26 June 2006
 Karen Last, 23 June 2006
 John McBride, Borough of Poole, 30 June 2006
 Tony Roestenburg, Convex Leisure Ltd, 27 June 2006
 Anna Wallis, Hotel and Catering Show, 26 June 2006

Brent

Councillor Steven Bate, Campaign Against Super Casino Expansion, 10 August 2006
 Dr Edward Cooper, 17 August 2006
 Leslie Fisher, 10 August 2006
 John Hambury, 27 March 2006, 28 March 2006
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Dr Simon J Lewis, City Coast Church, 9 June 2006

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Emily Shirley FRSA, PACE, 5 June 2006
 Mrs Molly Sturt, The Chapel, Littlebourne U R C, 14 June 2006

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Lorraine Barrett AM, National Assembly for Wales, 16 June 2006
Councillor Rodney Berman, Gregory Owens, David Walker, The County Council of the City and County of Cardiff, 26 June 2006
Councillor Gill Bird, Cardiff County Council, 20 June 2006
Chris Bryant MP, 6 July 2006
Mervyn Burnett, GMB South Western Region, 27 June 2006
Peter Cole, Capital Region Tourism, 23 June 2006
Mrs Debbie Davey, 30 May 2006
Lynn Davies, 16 June 2006
Dr Christopher Dickson, 13 September 2006
Chief Superintendent R Evans, South Wales Police, 26 June 2006
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Janice Gregory AM, National Assembly of Wales, 26 June 2006
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Peter Hales, E J Hales Chartered Surveyors, 22 June 2006
John Harris, 16 June 2006
Colin Jackson, 16 June 2006
Professor John Lovering, 30 August 2006
Mike Luscombe, Morley Fund Management on behalf of Cardiff Bay Partnership, 26 June 2006
Rt Hon Alun Michael JP MP; Julie Morgan MP; Jenny Willot MP; Kevin Brennan MP, 27 June 2006
Ian Miller, SOLACE Wales, 27 June 2006
Janet Miller, Professional Croupier Training Ltd, 10 August 2006
Rt Hon Rhodri Morgan AM, Welsh Assembly Government, 27 June 2006
Richard Olsen, Orion Land and Leisure (Cardiff) Ltd, 10 August 2006
Sir Steve Redgrave CBE, 16 June 2006
Huw Roberts, 1 September 2006
Councillor Russell Roberts, Rhondda Cynon Taf County Borough Council, 28 June 2006
Steve Thomas, Welsh Local Government Association, 26 June 2006
Julian Verity, Veritair Ltd, 27 June 2006
HE Wickam, 31 May 2006; 7 August 2006; 21 October 2006
Michael Woolhouse, Parkwood Leisure, 27 June 2006

Chelmsford

Peter Balls, Chelmsford Community Church, 12 June 2006
John Bedwell, 23 June 2006
Mr A Benson, 5 June 2006
Annemarie Berry, 9 June 2006
Gordon Billage, 14 June 2006
Tony Brown, 10 June 2006
P V Bugg, 27 June 2006
Chris Burt, 10 July 2006
Mrs S Cameron, 20 June 2006
Christine and Michael Cummins, 12 June 2006
Nahide Deniz, 29 June 2006
Shirley Durgan, 25 June 2006
Anita Eason, 8 June 2006
Councillor Philip Firth, 2 June 2006
Elizabeth Fowler, 25 June 2006

Mr and Mrs I H Freshwater, no date provided
 Brian Greenaway, 22 June 2006
 G Harding, 10 June 2006
 Mr and Mrs Harris, 25 June 2006
 Kenneth Hart, 10 June 2006
 J Harvey, 20 June 2006
 Mr and Mrs Hoarg, no date provided
 Mrs O J Hornby, no date provided
 Councillor John Hunnable, 25 June 2006
 Sylvia Hutchins, 25 June 2006
 Mrs E Jarrel, 13 June 2006
 Doug Killick, 9 June 2006
 Patricia and John Lillywhite, 12 June 2006
 B Lomas, 19 June 2006
 Andrew and Jill Luce, 19 June 2006
 Gary Luff, 14 June 2006
 Zoja Luff, 13 June 2006
 Reverend Robin Merrifield, Tile Kiln Church, 13 June 2006
 Jean McAslan, Christ Church United Reform Church, 21 June 2006
 Peter Metcalfe, 9 June 2006
 Reverend Jane Mortimer, Chelmsford Group of United Reformed Churches,
 22 June 2006
 Barry Mountain, 10 June 2006
 Pam Myall, 8 June 2006
 Jacqui N, 10 June 2006
 Peter Nash, 6 June 2006
 Patricia Otter, 22 June 2006
 Mr and Mrs A Pitches, 9 June 2006
 Ankie Postma, no date provided
 Paul Randall, 9 June 2006
 Steve Readings, 11 June 2006
 Collette Rosenbaum, 24 June 2006
 Marylee Rounce, 9 June 2006
 Gwyneth Rye, North Avenue United Reform Church, 19 June 2006
 J H Rye, 15 June 2006
 D O Scales, 12 June 2006
 Mrs A G Sharp, 9 June 2006
 Sandra Short, 9 June 2006
 Pamela Stevens, 15 June 2006
 Councillor J Trustrum, 24 June 2006
 C A Turner, 18 June 2006
 Ann Vine, 10 June 2006
 Jean Wardrop, 27 June 2006
 Mr and Mrs L White, 12 June 2006
 Bernard J Williams, 23 June 2006
 Marina Wood, 7 July 2006

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Nick Hodgson, Derbyshire County Council, 27 June 2006
 Wes Lumley, Bolsover District Council, 9 August 2006
 Andrew Street, Alliance SSP, 8 August 2006

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Gavin G Bates, Business Recovery and Insolvency, 10 October 2006
A C Benfield, K B Benfield Group Holdings Ltd, 19 October 2006
David L Burbidge OBE, DL, Burbidge Crafted Design, 10 October 2006
Larry Coltman, Reed Smith, 17 October 2006
Roger Dowthwaite, RITE, 3 October 2006
Dr Michael Goldstein CBE, 5 October 2006
David A Holt, D & P Holt Property Consultants, 6 October 2006
The Very Reverend John Irvine, Coventry Cathedral, 11 October 2006
Roger Medwell, NP Aerospace Ltd, 9 October 2006
David Penn, Shortland Horne Commercial & Professional Ltd, 3 October 2006
Robert Shaw, Harry Shaw City Cruiser, 29 Sept 2006
Lee Elizabeth Thomas, Aesthetics Events Limited, 19 October 2006
Peter Walters, CV ONE, 12 October 2006
Ian Whittle, 2 Oct 2006

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William S Mundy, Highfield Road Baptist Church, 8 June 06
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Reverend Richard Arding, St Michael & All Angels, 14 June 2006
Caroline Bennett, Catholic Children's Society, 21 June 2006
Reverend David Blacklock, Brent Methodist Church, Dartford, no date provided
Reverend Kenneth W Clark, Stone Parish Church, 5 June 2006
Tim Crome, 6 June 2006
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David Parsons, 6 June 2006
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Dumfries and Galloway

J R Baillie, no date provided; 11 November 2006
Russell Brown, MP for Dumfries and Galloway Constituency, 11 May 2006; 14 June 2006
Ruth Burl, 12 August 2006
Ian M Cameron, 20 July 2006
John Edwards, 19 June 2006
Alex Fergusson, Constituency MSP for Galloway and Upper Nithsdale, 11 May 2006
Lord Glentoran CBE, Shadow Minister of State for Northern Ireland, 10 May 2006
Alan Gordon, Stena Line Ltd, no date provided
Delia Holland, Visit Scotland, 12 May 2006
Mike Keggans, Chair, Local Economic Forum, Scottish Enterprise Dumfries and Galloway, 10 October 2006
Donald MacKinnon, South of Scotland European Partnership, 11 May 2006
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Janette Tait, 1 August 2006
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Merilyn K Combes, Coastal Academy, 25 June 2006
Patrick A B Cordingley, Chattertons Solicitors, 6 June 2006
Richard Dickinson, East Midlands Tourism, 27 June 2006
John Dunford, Bourne Leisure Limited, 26 June 2006

Peter Fitzgerald, Skegness & District Chamber of Commerce, 22 May 2006
 Andy Fletcher, GMB - Midland & East Coast Region, 26 June 2006
 Martin Hill, Lincolnshire County Council, 22 June 2006
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 Martin Bain, Rangers Football Club, 1 September 2006
 Richard Brown, Glasgow Community Planning Ltd, 26 June 2006
 Jean Charsley, Hillhead Community Council, 4 September 2006
 Ron Culley, Strathclyde Partnership for Transport, 27 June 2006
 Councillor James Fletcher, East Renfrewshire Council, 27 June 2006
 Euan Jamieson, Glasgow Harbour Ltd, 10 August 2006
 Marie-Therese Kielty, 10 August 2006
 Fiona Lees, East Ayrshire Council, 27 June 2006
 Councillor John Morrison, East Dunbartonshire Council, 3 July 2006
 Councillor Mary Paris, 10 August 2006
 Rona Taylor, Glasgow Restaurateurs Association, 26 June 2006
 Scott Taylor, Glasgow City Marketing Bureau, 21 June 2006
 Ken Rolwegan, 11 April 2006
 Dr Lesley Sawers, Glasgow Chamber of Commerce, 27 June 2006; 9 August 2006
 Frank Shennan, Casino Training UK Ltd, 30 August 2006

Greenwich

Beth Acheson, 27 June 2006
 Phil Acheson, 27 June 2006
 againstthecasino@hotmail.com, 31 May 2006
 John Anderson, Berkeley Homes (East Thames) Ltd, 10 August 2006
 Richard Baker OBE, Ravensbourne College of Design and Communication,
 10 August 2006
 Councillor Steven Bate, Campaign Against Super Casino Expansion, 10 August 2006
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 Karina Berzins, 2 August 2006
 James Bidwell, Visit London, 10 August 2006
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 R Brand, 5 July 2006
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 John Cook, 1 June 2006
 Myles Dove, 28 June 2006
 Pamela Fallas, 24 June 2006
 Kevin Lea, 26 June 2006
 Ken & Linda Hurd, 27 June 2006
 Dr Margarette Lincoln, National Maritime Museum, 10 August 2006
 Rachel Mawhood, 13 August 2006; 22 August 2006; 31 August 2006
 Mrs Hilary Miles, The United Reform Church: South East London District, 23 June 2006
 Tony Mitton, 30 August 2006
 Stephen Nelson, Greenwich, Bexley and Lewisham Chamber of Commerce,
 10 August 2006

Sergeant Dale Openshaw, 1 June 2006
Ted Paxton, 1 June 2006
Geoff Pine, Greenwich Community College, 10 August 2006
Father Michael Scanlon, St Peter the Apostle RC Church, 9 August 2006
Susanne Schrewe, 26 June 2006
Sir Bob Scott, Greenwich Peninsula Partnership, 9 August 2006
Sir Bob Scott, South London Business, 10 August 2006
John Simons, 18 June 2006
Judy Smith, 10 August 2006
Chris Smith, 2 June 2006
Eric Sorensen, Thames Gateway London Partnership, 10 August 2006
Kay Statter, 21 June 2006, 31 August 2006, 20 October 2006
Ken Stewart, 26 June 2006
Steve Sutherland, Charlton Athletic Football Club, 9 August 2006
Mr CD Tester, 2 June 2006
Jeanette Tsang, 10 June 2006
Simon Weeks, 20 June 2006
John Wilks, 2 June 2006
Duncan Wilson, World Heritage Site Executive, 8 August 2006
Wendy Young, 1 June 2006

Hastings

Roger Etchells, Roger Etchells Chartered Surveyors & Company on behalf of Stade Developments (Hastings) Limited, 22 May 2006
Chris Lee, 26 June 2006
Harmesh Pooni; RavenClaw Investments Inc, 28 June 2006; 21 September 2006
Harry Symonds Snr & Jnr, Anne Symonds and Mark Symonds; Coastal Amusements Ltd, 26 June 2006
Ms Sue Warren, enclosing a petition from 109 Hastings residents, 12 July 2006
Linda Williams; Hastings & St Leonards Chamber of Commerce, 26 June 2006

Havering

Peter Andrews, Thames Gateway Development Corporation, 11 August 2006
Sharon Bates, 5 August 2006
Pat Bryce, Adamsgate Action Group, 22 June 2006; 2 August 2006
James Brokenshire MP, MP for Hornchurch, 4 August 2006
Michael Charlton, Think London, 3 August 2006
Jean & Albert Clements, 5 August 2006
Aman Dalvi, Gateway to London, 4 August 2006
Jacquie Dean, Waltham Forest Council, 22 August 2006
Valerie and Alan Eastoe, 4 August 2006
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Derek Guyon, Rainham & Wennington Community Association, 7 August 2006
Mrs Janet Hares, 5 August 2006
Councillor Coral Jeffery, Rainham & Wennington Independent Councillor, 4 August 2006
Terry Lee, London Container Services, 17 July 2006
Reverend Bob Love, St. John & St. Matthew, the Parish Church of South Hornchurch, 4 August 2006
Jill Martin, Havering Chamber of Commerce and Industry, 3 August 2006
Bob McLintock, Brentwood Borough Council, 15 August 2006
J Robinson, 7 August 2006
L Robinson, 7 August 2006

Eric Sorensen, Thames Gateway London Partnership, 21 August 2006
Councillor Mark Stewart, Rainham & Wennington Independent Residents Association,
6 August 2006
Councillor Jeffrey Tucker, Independent Councillor for Rainham & Wennington residents,
4 August 2006
June Walker, Rainham Preservation & Improvement Society, 4 August 2006
Councillor Michael White, 'Please listen to the people of London', open letter to CAP signed by
53 supporters, mainly councillors
Graham Williamson, People's Alliance, 5 August 2006

885 campaign letters sent to the Prime Minister and forwarded to CAP

Hull

Reverend David Miller, The Methodist Church, 1 July 2006

Leeds

Rt Hon Hilary Benn, MP for Leeds Central, no date provided
Wayne Bowser, Richard Mansell, Leeds Chamber of Commerce & Industry, 21 April 2006; 18 May
2006; 14 June 2006
Alastair Da Costa, Marketing Leeds, 11 May 2006
Jan Fletcher OBE, Montpellier Estates, 30 June 2006
Councillor Mark Harris, The Leeds Initiative, 12 July 2006
Shaun Harvey, Leeds United, 4 July 2006; 26 July 2006
George Mudie MP, 14 July 2006
Michael Riddy; Stanley Casinos Limited, 31 March 2006
Iain Robertson; Skelton Business Park Limited, 27 June 2006; 11 August 2006

Leicester

Martin Peters, Leicester Shire promotions, 30 June 2006
Rt Hon Keith Vaz MP, MP for Leicester East, 30 June 2006

Luton

Reverend Peter C Budgell, Parish of Luton, St Anne with St Christopher, 4 June 2006
Judy Dexton, High Town Methodist Church, 1 June 2006
K James, London Luton Airport, 17 October 2006
Margaret Moran; MP for Luton South, 22 June 2006
Tony Palgrave, Southside & City Developments Limited, 29 June 2006
Councillor Sid Rutstein, Luton Borough Council, 20 June 2006
Major David G Ryder, The Salvation Army, Luton Corps, 26 June 2006 enclosing petition forms
with 482 signatures
Councillor Hazel Simmons, Luton Borough Council, 26 June 2006

Manchester

Martin Burke, Emotion Records, 4 October 2006 (letter forwarded to CAP from Gambling
Commission)
Elizabeth Coleman, Religious Society of Friends (Quakers), 26 June 2006
Irene Baron, New Deal for Communities Board, 26 June 2006
Robert Davies, The Maranatha Community, 7 July 2006 (with petition containing 82 signatures)
Chris Findley, Association of Greater Manchester Authorities, 10 August 2006
Steve Green, 24 June 2006
Dr Marijke Hoek, 'Network' Greater Manchester Evangelical Fellowship and

Mark Perry MRCGP, 27 June 2006
Mrs M A Podesta, 5 August 2006
Paul Simpson, Marketing Manchester, 31 August 2006
Peter Thomas MBE, The Velodrome Trust, 2 July 2006
Steven Woollon, East Manchester Residents Forum, 26 June 2006

Mansfield

Andy Fletcher, GMB - Midland and East Coast Region, 26 June 2006
Mr AE Roberts, Mrs ME Roberts, Mrs S Bantom, 25 June 2006
Carol Smith, Mansfield Baptist Church, 23 June 2006
Vernon Smith, 25 June 2006
Ms Karen Stafford, 25 June 2006

Middlesbrough

Colin Bradshaw, Middlesbrough Multi-Faith Development Group, 12 February 2006
Mrs Jacqui Fyfe, Stockton Methodist Church, 18 March 2006;
Revd Helen Jobling, The Middlesbrough and Eston Methodist Circuit, 15 March 2006
Kenneth E Johnson, Brookfield Community Council, 12 February 2006
Dennis Lane, 10 March 2006
George Ward, 21 March 2006
Revd Paul Wood, The Methodist Church, 10 April 2006

Milton Keynes

Chris Jones, 27 June 2006

Newcastle

Cynthia Atkinson, The North East Council on Addictions (NECA), 4 August 2006
Councillor Steven Bate, Campaign Against Super Casino Expansion, 10 August 2006
Malcolm Bowes, North East Assembly, 10 August 2006
Simon Calvert, The Christian Institute, 9 August 2006
Geoffrey and Rachel Cundell, 30 August 2006
William Cunningham, Newcastle Quakers, 10 August 2006
Andrew Dixon, NewcastleGateshead Initiative, 7 August 2006
Kehri Ellis, Newcastle Partnership, 8 August 2006
Lois Gardener, 5 September 2006
Christopher Harrison, Nathaniel Lichfield and Partners (on behalf of Isle of Capri Casinos Ltd), 17 August 2006
Rob McMullen, North East Chamber of Commerce, 8 August 2006
Mrs M J Rose, 30 August 2006
Kevin Rowan, Trades Union Congress Northern Region, 4 September 2006

Newham

Jamie Buchan, ExCeL London, 27 June 2006

North East Lincolnshire

Mr George Georgiou, 8 August 2006

Peterborough

Daphne Lynas, The Religious Society of Friends (Quakers), 15 August 2006
Councillor Adrian J Miners, Peterborough City Council, 7 June 2006

Restormel

Richard Martin, 5 April 2006

Scarborough

Richard Emmerson, 23 October 2006

StJohn Finlay, 18 October 2006

Nikolas and Rebecca Shaw, Opera House Casino, 9 July 2006; 31 July 2006

Sefton

Dr John Pugh MP, MP for Southport, 6 September 2006

Sheffield

Joe Ashton, no dated provided

Councillor David Baker, Sheffield City Council, 31 August 2006

Clive Betts MP, MP for Sheffield Attercliffe, 1 September 2006

Russell Blackwell, Hallam Methodist Church, 11 September 2006

Jean Booth, Stephen Hill Methodist Church, 10 October 2006

Chief Superintendent Paul Broadbent, South Yorkshire Police, 9 August 2006

Steve Brailey, Sheffield City Trust, 9 August 2006

Jane Brown, Sheffield First Partnership, 4 August 2006

Councillor Jillian Creasy, on behalf of Sheffield Campaign Against Supercasino Expansion (SCASE), 28 June 2006, enclosing Minutes of Public Meeting, 22 June 2006, Victoria Hall, Sheffield

Penny Coates, Nottingham East Midlands Airport, 9 August 2006

Frances Cunning, South East Sheffield Primary Care Trust, 10 August 2006

St John Deakin, South Yorkshire Employers Coalition, 15 August 2006

Neville Deardon, Doncaster Chamber of Commerce, 11 August 2006

Louise Dore, 1 September 2006

Gary Grief, 30 May 2006

R Hamilton, First South Yorkshire Limited, 31 August 2006

Sylvia Hamilton, Darnall Forum, 8 August 2006

Susan E Hobley, St Mark's Church Broomhill, 8 August 2006 enclosing a petition with 53 signatures

John Hudson, Sheffield First for Investment, 9 August 2006

John Hunt, Business and Professional Ministries, 6 August 2006

Peter Hurley, 18 May 2006

Councillor Mazher Iqbal, 10 August 2006

Richard Jones, South Yorkshire Destination Management Partnership, 9 August 2006

John Lewis, Rotherham Chamber of Commerce, 9 August 2006

G Maurice Littlewood, Handsworth Community Forum, 9 September 2006

Neville Martin, SCASE, 11 August 2006

Paul Martin, Christian Peoples Alliance, 7 August 2006

Michael Miller, 16 May 2006

Roger J Nunns, Barnsley Chamber of Commerce and Industry, 3 August 2006

Roger J Nunns, Barnsley Chamber of Commerce and Industry, 3 August 2006, forwarding copy of letter written to Yorkshire Forward, 2 May 2006

David Price, Church Action on Poverty in Sheffield, 8 May 2006; 9 August 2006

Matt Robson, Religious Society of Friends, Sheffield, 27 June 2006

Jason Rockett, Sheffield United, 31 August 2006

Revd William Shaw, Yorkshire Baptist Association, South Yorkshire District, 24 June 2006
Angela Smith MP, MP for Sheffield Hillsborough, 30 August 2006
Councillor Anne Smith MBE, 9 August 2006
Alex Sutherland, Learning & Skills Council South Yorkshire, 10 August 2006
Fred Thompson, 7 September 2006
Nigel Tomlinson, Sheffield Chamber of Commerce and Industry, 7 August 2006
W Watts, 4 August 2006
Gillian Wells, 22 May 2006
Roy Wicks, South Yorkshire Passenger Transport Executive, 9 August 2006

Solihull

Councillor Mike Whitby, Leader of Birmingham City Council, 25 May 2006;
14 August 2006

Southampton

Mr D A H King, The Swaythling and Bassett Covenant of Churches, 26 June 2006

Southend-on-Sea

Yvonne Booth, 1 August 2006
Pamela Bradford, 3 September 2006
Jack Campling, 31 July 2006
Prof Bernard de Neumann, 28 July 2006
Geoff Fulford, Leigh-on-Sea Town Council, 19 September 2006
Adrian Green, 6 July 2006; 25 July 2006
Stuart Greengrass, Renaissance Southend, 28 April 2006, 11 July 2006
Ann Harvey, 31 July 2006
George C Kieffer, East of England International Ltd, 24 April 06
Mike Lambert, Renaissance Southend, 11 August 2006
Sue Lee, 30 July 2006
Councillor Ted Lewin, 25 July 2006
Raymond R Saunt, 5 May 2006
Mary Spence, Thames Gateway South Essex Partnership Ltd, 2 May 2006
Steven Tomlin, 19 April 2006
Sheena Walker, 2 August 2006
Ken Westell, Save Our Seashore, 4 August 2006
Ron Woodley, Burges Estate Residents Association, 7 August 06
AW Worsfold, 29 July 2006
Councillor Peter Wrexham, Councillor Leigh Ward, 24 July 2006

Surrey Heath

Andrew Lloyd, 17 March 2006
Stewart Stevenson, no date provided

Swansea

Rt Hon Rhodri Morgan AM, Welsh Assembly Government, 27 June 2006
Granville Myers, The Salvation Army, Swansea Citadel, 27 June 2006

Thurrock

DG and JK Parker, 26 June 2006

Torbay

Mr Bernard Aspden, 27 May 2006

West Dunbartonshire

Jim Thomson, Bowling and Milton Community Council, 5 May 2006

Andrew Tottenham, Harrah's Entertainment Inc, 7 August 2006

Wolverhampton

Claire Bampstead, 28 June 2006

Simon Beattie, 14 June 2006

Phillip Carey, 20 June 2006

Ormila Dedi, 21 June 2006

Julia Gautier, 14 June 2006

Jolene Green, 16 June 2006

Lesley A Gross, 12 June 2006

Lindsey Jephcott, 29 June 2006

Alexandra Payne, no date provided

Anju Rai, 22 June 2006

Mr M Smith, 15 June 2006

Amanda Thomas, 12 June 2006

Mr M G Zvirbulis, 13 June 2006

Representations with general opposition to casinos

Eric Bamford, 2 August 2006; 7 August 2006

Councillor Steven Bate, CASE, 4 July 2006

Yvonne Booth, 1 August 2006

Stale Brekke, 7 August 2006

Thom Brooks, 30 August 2006

Caroline Geuter, 12 August 2006

Anne Lambourn, 1 May 2006

Hugo Minney, 30 August 2006

3. Documents submitted by other parties

Blackpool

Letters to CAP from Herbert Smith, 19 June 2006; 22 June 2006; 10 August 2006

Letter to CAP from Leaguenotion, 10 August 2006

Letter to CAP from Herbert Smith, 14 August 2006, enclosing:

'Representations to the Casino Advisory Panel in relation to Blackpool Council's bid to host the sole regional casino under the Gambling Act 2005'

'The Case for Locating a Regional Casino in Blackpool: A Critique' by NERA Economic Consulting, August 2006

'The social and economic impacts of regional casinos in the UK' by Hall Aitken, February 2006

'Blackpool's Regional Casino: Does Blackpool represent 'the best possible test of social impact' for a regional casino - a critique of psychological impact' by Professor Mark Griffiths of the Department for Psychology at Nottingham Trent University

Letter to CAP from Herbert Smith, 24 August 2006

Letter to CAP from Herbert Smith, 6 September 2006, enclosing:

'Supplemental Representations to the Casino Advisory Panel in relation to Blackpool Council's bid to host the sole regional casino under the Gambling Act 2005'

'Casino Advisory Panel: Hearing in Public, Blackpool, September 8th: NERA Memorandum' - NERA Economic Consulting
Letter to CAP from Herbert Smith, 7 September 2006, enclosing:
The Case for a Blackpool Casino: Further Thoughts, Observations, and Concerns - Brief Report by Professor Mark Griffiths, International Gaming Research Unit, Nottingham Trent University
'The Case for Locating a Regional Casino in Blackpool: A Critique', Revised 6 September 2006 - NERA Economic Consulting
'Part of the CASE why Blackpool is not the most suitable place to trial the regional/resort/supercasino concept in the UK' - Councillor Steven Bate, 8 September 2006
Letter to CAP from Herbert Smith, 19 September 2006
Letter to Blackpool Council from Herbert Smith, 19 September 2006, copied to CAP
Ipsos MORI Response to Professor Mark Griffiths, Nottingham Trent University report commissioned by Leaguenotion, 27 September 2006
Letter to CAP from Professor Corinne May-Chahal, Lancaster University, 'Blackpool EIP Social Impact Assessment', 28 September 2006
Pion Economic Impact Model for Blackpool Regional Casino Proposal: Casino Advisory Panel Note, 29 September 2006
ReBlackpool - Test of Social Impact: Note from Professor Sir Peter Hall
Letter to CAP from Dr A D Howe, Blackpool NHS Primary Care Trust, 29 September 2006, enclosing: 'Response by Blackpool PCT to comments on Blackpool's Gambling Harm Minimisation strategy in documents submitted by League Notion to Blackpool's Examination in Public into a proposed regional casino'
Letter to CAP from Mike Wilkinson, Lancashire and Blackpool Tourist Board, 17 October 2006, enclosing: Lancashire and Blackpool Visitor Economy Strategy 2006-2016 and Lancashire and Blackpool Visitor Economy Action Plan
Letter to CAP from Dennis Taylor, Lancashire Economic Partnership, 19 October 2006, enclosing: Lancashire Economic Strategy, July 2006 and Central Lancashire City Region Development Programme
Letter to Blackpool Borough Council from Herbert Smith, 19 October 2006, copied to CAP
Letter to CAP from David Biesterfeld, The Noble Organisation Ltd, 20 October 2006
Documents submitted by Leaguenotion to CAP on 20 October 2006:
Blackpool Conference and Casino Quarter - Transport Assessment: ReBlackpool, August 2006;
Minutes of the Casino Steering Group held on 21 October 2005;
Selection of FOI correspondence with Blackpool Council;
Pages 35 to 37 of NWDA's submission to ODPM and DTI of November 2004
NERA Response to Blackpool;
Brief Report by Professor Mark Griffiths of the International Gaming Research Unit
Letter to CAP from Herbert Smith, 24 October 2006, enclosing: 'Leaguenotion's Response to further information circulated recently by participants in the EIP of Blackpool Council's bid to the CAP (revised version)

Glasgow

Glasgow and Clyde Valley Joint Structure Plan 2006
Glasgow and Clyde Valley Joint Structure Plan 2000

Greenwich

Karina Berzins, assisted by Professor Barry Standish, 7 August 2006 'Regional casino submissions: Comparing and ranking the submissions for a regional casino license in London', London East Research Institute

Sheffield

Letter to CAP from David Price, Church Action on Poverty in Sheffield, 12 September 2006
Statement from Ken Torres, 13 September 2006
Email to CAP from Neville Martin, attaching a link to online petition, 19 September 2006
Letter to CAP from Neil Bishop, Darnall Forum, 3 October 2006
Letter to CAP from Paul Jagger, Sheffield Chamber of Commerce and Industry, 11 October 2006
Letter to CAP from Councillor Jillian Creasy; on behalf of Sheffield Campaign Against Supercasino Expansion (SCASE), 27 October 2006

Dartford

Letters to CAP from Geoff Baker, Gravesham Borough Council, 27 June 2006; 12 July 2006

Luton

Letter to CAP from Councillor David Franks, 29 September 2006
Letter to CAP from Councillor David Johnston, 27 September 2006

Wolverhampton

Letter to Steve Boyes, Wolverhampton City Council from Wolverhampton Racecourse, copied to CAP, 7 August 2006

4. Documents submitted by regional stakeholders: Regional Development Agencies, Regional Assemblies, Government offices, etc.

East of England

Graham Nelson, East of England Regional Assembly, 21 December 2005
George Kieffer, East of England Development Agency, 23 December 2005
Graham Nelson, East of England Regional Assembly, 5 January 2006
Adrian Cannard, East of England Regional Assembly, 20 March 2006

East Midlands

Andrew Pritchard, East Midlands Regional Assembly, 21 December 2005 attaching EMRA 'Review of the East Midlands Regional Plan to 2026 - Options for Change'
David Wallace, East Midlands Development Agency, 22 December 2005 attaching EMDA 'Market Appraisal & Economic Impact Assessment of a Potential Location for a Regional Casino in the East Midlands Region' - Extracts from a final draft report by Scott Wilson Kirkpatrick & Co Ltd, December 2005
Richard Dickinson, East Midlands Tourism, 26 June 2006
Andrew Pritchard, East Midlands Regional Assembly, 22 June 2006
David Wallace, East Midlands Development Agency, 27 June 2006
Linda Leehane, East Midlands Development Agency, 3 July 2006

London

Judith Saloman, London First, 24 October 2005
Peter Bassett, Thurrock Thames Gateway Development Corporation, 24 January 2006, enclosing letter from Peter Bassett to East of England Regional Assembly, 24 January 2006
Ken Livingstone, Mayor of London, 20 February 2006
John Allen, London Thames Gateway Development Agency, 14 March 2006, enclosing map of London Thames Gateway area

Baroness Valentine, London First, 20 March 2006
Andrew Barry-Pursell, Mayor's Office, 27 June 2006, enclosing 'Draft Further Alterations to the London Plan (Spatial development Strategy for Greater London), May 2006
John Allen, London Thames Gateway Development Corporation, 27 June 2006
Lorraine Baldry, London Thames Gateway Development Corporation, 28 June 2006
Peter Andrews, London Thames Gateway Development Corporation, 11 August 2006
Baroness Valentine, London First, 11 August 2006
Ken Livingstone, Statement about a Regional Casino in Greenwich, for the Examination in Public on 30th August 2006
Ken Livingstone, 9 October 2006, enclosing copy of letter to London Borough of Havering and revised draft casino policy

North East

Malcolm Bowes, North East Assembly, 10 August 2006
Margaret Fay, One NorthEast and Alex Watson, North East Assembly, 28 June 2006, enclosing 'Casino Advisory Panel further consultation: Response of One NorthEast and North East Assembly', June 2006
Colin Blackburn, North East Assembly, 22 December 2005
John Holmes, One NorthEast, 16 December 2005, enclosing 'One NorthEast Casino Appraisal Criteria', KPMG LLP, 1 December 2005

North West

Tim Hill, North West Regional Assembly, 8 December 2005 enclosing 'Extract from the North West Plan: Interim Draft Revisions to the Regional Spatial Strategy for the North West of England, October 2005'
Steven Broomhead, Northwest Regional Development Agency, 23 December 2005
Janette Whitehurst, Northwest Regional Development Agency, 23 December 2005
Michael Gallagher, North West Regional Assembly, 14 March 2006
Michael Gallagher, North West Regional Assembly, 7 April 2006
Michael Gallagher, North West Regional Assembly, 12 June 2006
Steven Broomhead, Northwest Regional Development Agency, 26 June 2006
Pion Economics (June 2005) Casinos in England's Northwest: An Assessment of Market Demand

Scotland

Jack Perry, Scottish Enterprise, 30 November 2005
David Anderson, Scottish Enterprise Dunbartonshire, 14 August 2006
Nicol Stephen, MSP, Scottish Executive, 12 September 2006 enclosing:
Dr Gerda Reith (2006) Research on the Social Impacts of Gambling: Final Report Scottish Executive Social Research
Dr Gerda Reith with Scottish Centre for Social Research (2006) Research Findings on the Social Impacts of Gambling Scottish Executive Social Research
Scottish Executive (2006) Potential Economic Impact of Regional Casino in Scotland - Overview/Summary Scottish Executive Social Research

South East

John Pounder, South East England Regional Assembly, 6 January 2006 enclosing Extract from Draft South East Plan
Catriona Riddell, South East England Regional Assembly, 28 June 2006 attaching draft copy of the South East Plan: Policy TSR4: Tourism Attractions
Catriona Riddell, South East England Regional Assembly, 28 July 2006
Paul Lovejoy, South East England Development Agency, 28 September 2006

South West

Richard Morgan, Torbay Development Agency, 9 December 2005
Geoffrey Wilkinson, South West of England Regional Development Agency, 5 January 2006
Keith Woodhead, South West Regional Assembly, 12 April 2006
Jane Henderson, South West of England Regional Development Agency, 28 June 2006
Stuart Todd, South West Regional Assembly, 31 July 2006, attaching 'Extract on Casinos taken from Draft RSS'

Wales

Ian Williams, Welsh Assembly Government, 23 June 2006

West Midlands

Rose Poulter, West Midlands Regional Assembly, 15 December 2005, attaching 'Relevant RSS Policies'
Roger Sumpton, Advantage West Midlands, 19 December 2005
Nick Paul, Advantage West Midlands, 25 May 2006
Rosie Paskins, Advantage West Midlands, 31 May 2006
Copy of letter from Trudi Elliott, Government Office for the West Midlands to Coventry City Council, 6 June 2006
Rose Poulter, West Midlands Regional Assembly, 22 June 2006
Nick Paul, Advantage West Midlands, 28 June 2006, attaching: Solihull Social Impact Assessment, Solihull Economic Impact Assessment, Regeneration Impact and Project Leverage documents and 'The Social and Economic Impact of Casinos in the West Midlands Region': Final Report (GHK), March 2006
Nick Paul, Advantage West Midlands, 7 August 2006

Yorkshire and Humberside

Felicity Everiss, Government Office for Yorkshire and the Humber, 9 January 2006
Jan Anderson, Yorkshire Forward, 7 June 2006
Chris Martin, Yorkshire and Humber Assembly, 24 August 2006, 'Statement by Yorkshire and Humber Assembly for Sheffield City Council's proposals to be permitted to licence a regional casino', August 2006
Tom Riordan, Yorkshire Forward, 4 September 2006

Annex I: Casino Advisory Panel: Selected matters for discussion at the Examinations in Public into the shortlisted proposals for a regional casino

The following are the key areas selected by the Panel upon which the discussion at the individual Examinations in Public (EiP) of the shortlisted proposals for a regional casino were focused.

Blackpool

Type of Area:

- Are the demographic characteristics of Blackpool such as to offer the best test of social impact? Is the economic future of Blackpool really as bad as is claimed?

Social Impact

- To what extent would the proposed casino lead to adverse social impact locally in terms of exacerbating problem gambling?
- To what extent will the employment opportunities benefit local unemployed and disadvantaged people?
- Need for regeneration, probability of implementation and securing of regeneration benefits
- Should there be confidence in the success of the proposal in itself and in achieving economic regeneration?

Willingness to license

- Can the Panel be sure that political considerations will not affect the Council's willingness to license?

Regional Context

- Regional support for the proposal appears to be based largely on the Pion Report. Can the Panel be satisfied as to its assumptions of employment, customer draw, multiplier effect, and leakage, and the like?
- Why do some regional bodies support Blackpool over Manchester?

Community Benefits

- What should be, or is likely to be, achieved, in terms of community benefits in the competition required by Schedule 9 of the Gambling Act 2005?

Cardiff

Type of Area

- Are the demographic characteristics of Cardiff such as to offer the best test of social impact?

Social Impact

- To what extent would the employment opportunities offered benefit locally unemployed and disadvantaged people?
- What are the other social impacts likely to be?

Need for regeneration, probability of implementation and securing of regeneration benefits

- What is the real connection between the proposed casino and the Sports Village? Is it just a matter of hoped-for cross subsidy?
- How does the proposal fit with Cardiff's tourism strategy?

Community benefits

- What should be, or is likely to be, achieved, in terms of community benefits in the licensee competition required by Schedule 9 of the Gambling Act 2005?
- Can the Panel be confident of the community benefits claimed? In particular, can there be confidence in the number of jobs to be created?

National & Regional Context

- How does the proposal fit in with the national policy for Wales?

Glasgow

Type of Area

- Are the demographic characteristics of Glasgow such as to offer the best test of social impact?

Social Impact

- To what extent would the employment opportunities offered benefit unemployed and disadvantaged local people?

Need for regeneration, probability of implementation and securing of regeneration benefits

- How does the casino proposal fit in with regeneration plans for River Clyde waterside?
- How realistic are these plans?
- How realistic are the plans for transport improvements?

Willingness to license

- How can the Panel be assured of the Council's willingness to license in the longer term?

Regional Context

- How does the proposal fit in with the region's tourism strategy?

Community benefits

- What should be, or is likely to be, achieved, in terms of community benefits in the competition required by Schedule 9 of the Gambling Act 2005?

Greenwich

Type of Area

- Greenwich being but a sector of the whole metropolitan area, how can the Panel be satisfied that it offers the best test of social impact?

Social Impact

- To what extent would the employment opportunities offered benefit unemployed and disadvantaged people locally?
- What are the other social impacts likely to be?
- What confidence can be attached to forecasts of job creation and economic impact?

Need for regeneration, probability of implementation and securing of regeneration benefits

- Is the driving motive for the proposal securing the future viability of the Dome?
- How does the proposed casino fit in with the overall redevelopment of the Dome?

Regional Context

- How does the proposal stand in relation to London's tourism strategy?
- How does the proposal stand in relation to the Olympic strategy?

Community benefits

- What should be, or is likely to be, achieved, in terms of community benefits in the competition required by Schedule 9 of the Gambling Act 2005?

Manchester

Type of Area

- Greater Manchester being a large conurbation, how can the Panel be satisfied that it would offer the best test of social impact?

Social Impact

- To what extent would the employment opportunities offered benefit unemployed and disadvantaged people locally?
- To what extent would the proposed casino lead to adverse social impact locally in terms of exacerbating problem gambling?

Need for regeneration, probability of implementation and securing of regeneration benefits

- Should there be confidence in the success of the proposal in itself and in terms of achieving economic regeneration?
- What is the connection between SportCity and the proposed casino?

Willingness to license

- How can the Panel be assured of the Council's willingness to license in the longer term?

Regional Context

- The regional view on this proposal appears to be largely based on the Pion report. Can the Panel be satisfied as to its assumptions of employment, customer draw, multiplier effect and leakage, and the like?
- Why do some regional bodies support Blackpool over Manchester?
- How does the proposal fit in with the regional tourism strategy?

Community Benefits

- What should be, or is likely to be, achieved, in terms of community benefits in the competition required by Schedule 9 of the Gambling Act 2005?

Newcastle

Type of Area

- Are the demographic characteristics of Newcastle such as to offer the best test of social impact?

Social Impact

- To what extent would the proposed casino lead to adverse social impacts locally in terms of exacerbating problem gambling?
- To what extent would the employment opportunities offered benefit local people who are unemployed or otherwise disadvantaged?

Need for regeneration, probability of implementation and securing of regeneration benefits

- What confidence can be attached to forecasts of employment and economic growth?
- Is the economy of the North-East sufficiently buoyant as to secure the levering-in of other desired development in consequence of the development of a casino?

Willingness to license

- How can the Panel be confident of the Council's willingness to license in the longer term?

Regional Context

- How does the proposal fit in with the region's tourism strategy?

Community Benefits

- What should be, or is likely to be, achieved, in terms of community benefits in the competition required by Schedule 9 of the Gambling Act 2005?

Sheffield

Type of Area

- Are the demographic characteristics of Sheffield such as to offer the best test of social impact?

Social Impact

- To what extent would the proposed casino lead to adverse social impact locally in terms of exacerbating problem gambling?
- To what extent would the employment opportunities offered benefit local people who are unemployed or otherwise disadvantaged?
- How would the proposed casino affect the faith sensitivities of local people?

Need for regeneration, probability of implementation and securing of regeneration benefits

- Is the economy of South Yorkshire sufficiently buoyant as to secure the levering-in of other desired development in consequence of the development of a casino?
- What confidence can be attached to forecasts of employment and economic growth?
- How can the Panel be satisfied that development of a casino in the Lower Don Valley would result in a turn-around of the area's economic fortunes?
- Can there be confidence in the adequacy of the transport links underpinning the casino proposal?

Regional Context

- How does the proposal fit in with the regional tourism strategy?
- How can the Panel be satisfied that this proposal is the best in the region?

Community Benefits

- What should be, or is likely to be, achieved, in terms of community benefits in the competition required by Schedule 9 of the Gambling Act 2005?

Annex J: Schedule of Examinations in Public of shortlisted proposals for a regional casino, and persons and organisations who participated (heads only)

Wednesday 31 August 2006:

Greenwich at the Jury's Great Russell Street Hotel, London

Greenwich Council

Councillor Peter Brooks

Mary Ney

Government Office for London

Robert Whittaker

Greater London Authority

Andrew Barry-Purcell

London First

Judith Salomon

London Thames Gateway Development Corporation

John Allen

Greenwich, Bexley & Lewisham Chamber of Commerce

Stephen Nelson

Greenwich Peninsula Chaplaincy

Reverend Malcolm Torry

Greenwich Peninsula Partnership

Sir Bob Scott

Metropolitan Police

Chief Superintendent Peter Lowton

Thames Gateway London Partnership

Eric Sorenson

AEG

David Campbell

London East Research Institute

Karina Berzins

Friday 1 September 2006:

Cardiff at the Cardiff Jury's hotel

Cardiff City Council

Tom Morgan

Welsh Assembly Government

(Department of Enterprise, Innovation & Networks)

Mike Hnyda

South Wales Police

Martyn Jones

Visit Wales

John Kingsford

Capital Region Tourism

Peter Cole

Community Action for Responsible Gaming

Bob Walker

GMB Union

Mike Payne

Rhondda Cynon Taf County Borough Council

Sheila Davies

Stevens & Associates

Professor Terry Stevens

H E Wickham

Professor John Lovering

Orion

Richard Olsen

Salvation Army

Major Peter Moran

Monday 4 September 2006:

Glasgow at the Hilton Glasgow Hotel

Glasgow Council

Councillor Steven Purcell

Glasgow & Clyde Valley Joint Structure Plan Committee

Grahame Buchan

Scottish Enterprise

Stuart Patrick

Scottish Exhibition Centre Ltd

Mike Closier

Glasgow Chamber of Commerce

Lesley Sawers

Glasgow City Marketing Bureau

Scott Taylor

Glasgow Harbour Ltd

Euan Jamieson

Visit Scotland

Tom McWilliams

Glasgow Rangers Football Club

Sam McEwan

Councillor Mary Paris

Ken Rolwegan

Tuesday 5 September 2006:

Newcastle at the Newcastle Thistle Hotel

Newcastle City Council

Paul Rubinstein

Councillor John Shipley

One NorthEast Regional Development Agency

Tom Warburton

North East Assembly

Mike Spurgeon

Government Office for the North East

Andrew Lewis

North East Council on Addictions (NECA)

Cynthia Atkinson

Newcastle Partnership

Kehri Ellis

Newcastle Gateshead Initiative

Andrew Dixon

North East Chamber of Commerce

Rob McMullen

The Religious Society of Friends – Quakers

Professor William Cunningham

The Christian Institute

Humphrey Dobson

Wednesday 6 September 2006:
Sheffield at the Hilton Sheffield Hotel

Sheffield City Council

Sir Robert Kerslake
Councillor Jan Wilson

Yorkshire Forward

Johanna Tuck/ Tom Riordan

Yorkshire and Humber Assembly

Robert Murfin

Government Office Yorkshire and Humber

Martin Seymour

South Yorkshire Baptist Association

Reverend Nigel Manges

Darnall Forum

Sylvia Hamilton

Church Action on Poverty in Sheffield

David Price

Sheffield Campaign Against Super Casino Expansion (SCASE)

Jillian Creasy

South Yorkshire Police

Detective Superintendent John Parr
Chief Superintendent Paul Broadbent

Sheffield First Partnership

Jane Brown

Darnall Area Panel

Councillor Mazher Iqbal

South Yorkshire Destination Management Partnership

Richard Jones

Sheffield Chamber of Commerce and Industry

Nigel Tomlinson

Sheffield Primary Care Trust

Frances Cuning

Sheffield First for Investment

John Hudson

Thursday 7 September 2006:

Manchester at the Manchester Golden Tulip Hotel

Manchester City Council

Sir Howard Bernstein

New East Manchester Ltd

Tom Russell

East Manchester Residents' Forum

Stephen Green

Greater Manchester Police

Chief Superintendent Justine Curran

Marketing Manchester

Paul Simpson

Association of Greater Manchester Authorities

Chris Findlay

Quakers

Margaret Gregory

Government Office for the North West

Mike Greenwood

North West Regional Development Agency

Nick Gerrard

North West Regional Assembly

Michael Gallagher

Friday 8 September 2006:

Blackpool at the Blackpool Imperial Hotel

Blackpool Council

Steve Weaver

Re:Blackpool

Sir Peter Hall

Preston City Council

Peter Kuit

Lancashire and Blackpool Tourist Board

Mike Wilkinson

Lancashire Economic Partnership

Dennis Taylor

Leisure Parcs

Craig Hemmings

North and Western Lancashire Chamber of Commerce

Hugh Evans

Blackpool Hotel and Guesthouse Association

Colin Asplin

Blackpool Business Leadership Team

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Annex K: Final stage of the evaluation process

1. The evaluation process was the same for both regional proposals and large/small proposals, with the exception that appraisal of the regional proposals was informed by the results of the EiP.
2. The evaluations drew on, in respect of each shortlisted proposal:
 - the proposals as submitted;
 - all appropriate material from the EiP sessions (regionals only);
 - the answers to the previously circulated questions;
 - all other relevant material, properly submitted.
3. The earlier scoring system had been an invaluable tool to inform the shortlisting stage and to identify the various strengths and weaknesses of the original proposals. Those strengths and weaknesses were then explored in the circulated questions and EiPs (regionals only). That final evaluation stage then completed that detailed consideration. It concentrated on building from the initial appraisal, in the light of the analysis of the further evidence submitted and the Panel's relevant expertise, with reasoned, detailed, discussion.
4. All the shortlisted proposals were considered carefully against the criteria set out in the Panel's Terms of Reference and in accordance with Government policy as set out in the Statement of National Policy dated 16th December 2004. The primary consideration was to ensure that the areas recommended to the Secretary of State provided the best possible test of social impact. Subsidiary to that was the need to include areas in need of regeneration (which were likely to benefit in regeneration terms from a casino) and to ensure that those areas were willing to license a new casino. The Panel also identified areas for the new casinos that would provide a good range of types of areas and a good geographical spread of areas across Britain. That was in order to ensure that the impact of the new casinos could be assessed on the basis of a broad range of information and experience. The Panel was also required to ensure that, with respect to the regional casino, the chosen area was compatible with the broad locations identified in Regional Spatial Strategies or draft revisions of those before the First Secretary of State.
5. At that stage each member of the Panel reviewed the original proposal, and all other relevant material.
6. The agenda for the subsequent discussion was as follows:
 - Each shortlisted proposal was taken in turn, with each member considering his evaluation of it in the light of the above criteria. At that stage, the particular merits of each proposal were evaluated on an individual basis, whilst drawing out the points which would facilitate a subsequent comparison with others;
 - There was then discussion leading to a Panel decision on the merits of each proposal.

- The Secretariat made a note of the agreed evaluation, which later formed the basis of the final report;
- In respect of the regional proposals, discussions took place leading to the identification of the winning proposal;
- The reasons for that identification of a single regional proposal above all the others were agreed and recorded for the final report;
- Discussions took place as to competitive merit of balancing this relative factor as necessary against the need for a good geographical spread and a good range of types of areas. In that way, the identification of the winning proposals was discerned;
- The reasons for the proposals chosen were agreed and recorded for the final report.

Prior to meeting to discuss their decisions Panel members had undertaken their own preparation in order to be able to address the proposed discussions.

Annex L: Casino permitted areas

List of areas in which the licensing of clubs for gaming other than bingo is permitted showing the number of licenced clubs operating on 1 April 2005 and 31 March 2006

	01 April 2005	31 March 2006		01 April 2005	31 March 2006
England					
That area which is within the area specified in the licensing (Metropolitan Special Hours Area) Order 1961 – plus the city of Westminster and the Royal Borough of Kensington and Chelsea				24	24
The areas of the former County Boroughs, Non-County Boroughs and Urban Districts of:					
Birkenhead	1	1	Northampton	2	2
Birmingham	6	7	Nottingham	3	2
Blackpool	3	3	Plymouth	2	2
Bolton	2	2	Portsmouth	3	3
Bournemouth	2	2	Ramsgate	1	1
Bradford	2	2	Reading	2	2
Brighton	3	3	Ryde	0	0
Bristol	4	4	Salford	2	2
Coventry	2	2	Sandown/Shanklin	0	0
Derby	2	2	Scarborough	1	2
Dudley	1	1	Sheffield	3	3
Great Yarmouth	2	2	Southampton	3	3
Hove	1	1	Southend-on-Sea	3	3
Huddersfield	1	1	Southport	1	1
Kingston-upon-Hull	2	2	Stockport	2	2
Leeds	4	4	Stoke-on-Trent	2	2
Leicester	3	3	Sunderland	1	1
Liverpool	4	4	Teesside/Middlesbrough	1	1
Luton	3	3	Torbay	1	1
Lytham St Annes	1	1	Walsall	2	2
Manchester	6	6	Warley	0	0
Margate	2	2	West Bromwich	1	1
Newcastle upon Tyne	3	4	Wolverhampton	2	2
Wales					
The Areas of the Former County Boroughs of:					
Cardiff				3	3
Swansea				1	1
Scotland					
The Areas of the Former Counties of the Cities of:					
Aberdeen				2	2
Dundee				1	1
Edinburgh				4	4
Glasgow				5	5
Total				138	140

This document can also be provided
to meet the specific requirements of
people with disabilities

This report and many of the related
documents can be found on the
Casino Advisory Panel website at
<http://www.culture.gov.uk/cap/>

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