

**REPRESENTATIONS TO THE CASINO ADVISORY PANEL IN RELATION TO  
BLACKPOOL COUNCIL'S BID TO HOST THE SOLE REGIONAL CASINO UNDER  
THE GAMBLING ACT 2005**

**1. INTRODUCTION: THE CASINO ADVISORY PANEL ("CAP")'S JURISDICTION**

- 1.1 By way of background to the present submissions, we, Leaguenotion, are a UK company which operates Coral Island and Funland. Coral Island is believed to be the biggest complex of its kind in Europe. It features approximately 1000 “slots”, including a large number of fruit machines restricted to adults; bingo; “family entertainment facilities” such as children’s rides, simulators and fairground attractions; 6 restaurants; 2 bars; a nightclub; live entertainment; and 12 speciality retail outlets. Funland is a more traditional, recently refurbished, amusement arcade. Again, it features significant numbers of “adult only” fruit machines. Both businesses are located on the Blackpool seafront. We also have substantial investment plans for the creation of a new visitor orientated casino in the adjoining Palatine Building.
- 1.2 We have very serious concerns, which we detail below, regarding Blackpool Council's bid to host the sole regional casino – concerns which are informed by our considerable experience as operators of gambling and leisure businesses in Blackpool for over 25 years and the experience of companies within our corporate group, the Noble Organisation, which operates some 200 leisure and gambling businesses throughout the UK.
- 1.3 Section 175 of the Gambling Act 2005 (the "Act") permits the establishment of one regional casino at a location to be appointed by the Secretary of State by an Order under Section 175(4) of the Act. The Secretary of State has asked the CAP to assist her in the exercise of her Order making powers under Section 175(4) of the Act to determine the geographical distribution of casino premises' licences, including the location of the sole regional casino.
- 1.4 The CAP's Terms of Reference dated 5 August 2005 state that:
- "The criteria against which the panel will assess [the] 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."<sup>1</sup>

1.5 Within the above framework, the CAP is also required to consider government policy in relation to the location of regional casinos as set out in "Casinos: Statement of Government Policy" dated 16 December 2004. We note that relevant criteria for the CAP's consideration, as set out in said policy document, include:

1.5.1 the need to protect children and other vulnerable people from harm;

1.5.2 the need to prevent gambling being a source of crime and disorder;

1.5.3 the potential for regeneration in the areas proposed to host casinos licensed under the Act, including the combination of the casino facilities with other leisure activities; and

1.5.4 the need to adopt a cautious approach to measure whether introduction of regional casinos leads to an increase in problem gambling.

1.6 In addition to the above criteria, we refer to the CAP's "Call for Proposals" paper dated 31 January 2006 (updating the government policy paper, described above, to take into account subsequently revised proposals for only one regional casino, as opposed to eight originally contemplated). It outlines the CAP's interest in obtaining reliable data concerning, in particular, the social impact of casino proposals, the need for regeneration and community issues in the areas proposed to host casinos under the Act.

1.7 We note the CAP's stated intention to consult as widely as possible in taking its work forward and to accept representations relevant to its remit (as outlined above).<sup>2</sup> We welcome this openness and, in the same spirit, submit representations in relation to Blackpool Council's bid to the CAP "Towards a World Class Resort Destination" (the "Blackpool Bid Document").

## **2. BACKGROUND TO THE PRESENT SUBMISSION**

2.1 In preparing the present submissions to the CAP we have reviewed the Blackpool Bid Document and supporting documents listed at Appendix 1. In addition we have had the benefit of extensive research conducted into the impact of a regional casino in Blackpool, such as the Hall Aitken and the Henley Centre Reports, also listed at Appendix 1. These

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<sup>1</sup> CAP Terms of Reference at <http://www.culture.gov.uk/cap/frame.htm>

<sup>2</sup> CAP Framework Document at <http://www.culture.gov.uk/cap/frame.htm>

documents together with two additional reports entitled "The Case for Locating a Regional Casino in Blackpool: A Critique" by NERA Economic Consulting and "Blackpool's Regional Casino: Does Blackpool represent 'the best possible test of social impact' for a regional casino – a critique of psychosocial impact" by Professor Mark Griffiths of the Department of Psychology at Nottingham Trent University, respectively, form the basis of our critique of Blackpool Council's bid to host the sole regional casino and are referred to in detail in the body of our representations below.

- 2.2 We have not, in the short time available to prepare this submission to the CAP, had access to various documents which we would have liked to review. We attach at Appendix 2 a list of information which we have requested pursuant to Freedom of Information Act/Environmental Information Regulations requests and which we have yet to receive. We note that this information was not available with the Blackpool Bid Document on the CAP website which is disappointing given the importance of the underlying documentation in an assessment of Blackpool Council's bid and the CAP's own stated desire to ensure transparency. In view of the CAP's aim that the selection of the location for the regional casino should be transparent, we are very concerned by Blackpool Council's delay in providing the information and its suggestion in correspondence that certain documentation will be withheld from inspection.<sup>3</sup> We shall continue to seek access to and, in turn, review additional documents which we may obtain relevant to Blackpool Council's bid and reserve the right, therefore, to make further representations to the CAP to assist it in its task of evaluating Blackpool Council's proposal.
- 2.3 We also note that on 24 July 2006 the CAP published a Press Notice regarding the shortlist of successful proposals. The notes to the Press Notice make clear that all authorities (including Blackpool Council) have the right to make further submissions in relation to the lines of enquiry set out in the CAP's Call for Proposals and that such submissions must be made by 14 August 2006. It will be apparent from this present submission that Leaguenotion will be seriously adversely affected if the regional casino were to be located in Blackpool. Accordingly, as a matter of fairness, we would be grateful for an opportunity to submit further representations in response to any new material that Blackpool Council submits to the CAP.
- 2.4 The CAP will be aware that we have requested permission to appear at the Examination in Public of Blackpool Council's bid on 8 September 2006. We believe that we can make an

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<sup>3</sup> A summary of our correspondence with Blackpool Council on this point is set out at Appendix 2.

important contribution to the consideration of Blackpool Council's bid to host the regional casino and thereby assist the CAP in its evaluation of Blackpool as a candidate location.

### **3. EXECUTIVE SUMMARY OF REPRESENTATIONS IN OPPOSITION TO BLACKPOOL BID**

By way of summary of our representations, we urge the CAP to decline to recommend Blackpool as the site for hosting the regional casino because it fails to meet the relevant criteria as follows:

- 3.1 Blackpool does not offer the best possible test of social impact. On the contrary, Blackpool is in fact a wholly inadequate location in which to test the social impact of a regional casino. It is a unique town in which gambling and machine-based attractions already have an unusually dominant presence and where there are already high levels of social deprivation. Furthermore, its population is insufficiently diverse. As such, Blackpool is not an area which is broadly representative of the social, business and economic mix of most likely sites for a regional casino suitable for the pilot study. Further, levels of existing problem gambling have not been properly tested and this is an important issue given the wholly exceptional impact on problem gambling rates that Category A slot machines are likely to induce. As NERA Economic Consulting and Professor Griffiths conclude<sup>4</sup>, these unlimited stake and prize machines, present in such vast numbers (1250) represent a wholly new level of risk in contrast to the restricted type and, in some cases number, of machines available in the resort's existing casinos, bingo halls, pubs and amusement arcades.
- 3.2 Blackpool is not dependent upon the regeneration prospect of a casino development (as measured in employment and other social deprivation data) and is, in any event, unlikely to benefit in these terms from a new casino, because:
  - 3.2.1 the casino is by no means the sole or even the main regeneration project envisaged for, or underway in, Blackpool – there are other high-profile projects and there are numerous local businesses which are keen to continue to invest and commit to revitalising the town. We have good grounds to believe that even further private sector investment is likely once 'bid blight' (i.e. the threat that a regional casino will be introduced into the current business mix thereby damaging current competing enterprises) is removed;

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<sup>4</sup> "The Case for Locating a Regional Casino in Blackpool: A Critique" by NERA Economic Consulting and "Blackpool's Regional Casino: Does Blackpool represent 'the best possible test of social impact' for a regional casino – a critique of psychosocial impact" by Professor Mark Griffiths of the Department of Psychology at Nottingham Trent University.

- 3.2.2 the regeneration benefits of the casino are overstated in Blackpool's Bid Document – in particular, it will replicate and, because of its monopoly rights in relation to Category A slot machines, eliminate competition so that the employment benefits are over-stated whilst the negative effects, such as problem gambling, are understated;
- 3.2.3 Further, based on analysis undertaken by NERA Economic Consulting detailed in its report, it appears that Blackpool's economic impact assessment and, indeed, the data upon which its economic benefits have been calculated are highly questionable and unreliable. Linked to this is Blackpool's suggestion that the development of the sole regional casino represents the fulfilment of the Blackpool Masterplan. We disagree with this suggestion not least because the Masterplan and the regeneration benefits expected to flow from its realisation depend upon four resort casino developments and cannot be expected to arise from one regional casino alone.
- 3.3 Whilst Blackpool Council claims to be willing to licence a new casino and implement its proposals, there are serious legal impediments to the manner in which it has indicated that it intends to do so. Blackpool Council has, for instance, considerably overstated the suitability of its bid:
- 3.3.1 For instance, the underlying Local Plan which provides for the location of the casino is currently subject to a legal challenge<sup>5</sup> which is likely to lead to a lengthy delay. The challenge asserts a failure in the plan's policies to properly reflect national planning policy statements and a failure by the Council to follow advice given to it prior to adoption by the Local Plan Inspector. Furthermore, it is not lawful for the CAP to authorise the use of the Council's powers or for the Council to use those powers in the way which it has indicated that it intends to undermine our established, competing business interest, which will be the effect if Blackpool's bid is successful. Neither would it be sensible for it to do so, given the contribution of Coral Island to Blackpool's current overall attraction. The facility attracts some 4 million visitors per annum and is recognised in the adopted Local Plan as one of the resort's main "magnets" (Policy RR2 para 2.12).
- 3.3.2 Further, we understand that ReBlackpool has very recently submitted a planning application to Blackpool Council for a regional casino and other development on

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<sup>5</sup> We refer to our legal challenge under section 287 of the Town and Country Planning Act 1990 at the High Court of Justice in London.

the proposed site. We believe that the planning application is misconceived and inconsistent with prevailing planning policy on the location of casinos and likely to be called-in by central government for review, leading to delays and, importantly, uncertainty that the proposed site will be used.

- 3.4 There are indications that the development of the regional casino, if located in Blackpool, will involve illegal State Aid, since the sole regional casino will affect trade between member states as a destination for tourists from other Member States of the EU and there are concerns that public funding and the use of publicly owned land for the casino may be considered to be illegal State Aid.
- 3.5 The operation of a regional casino in Blackpool will be an overwhelming threat to existing businesses offering adult machine gambling, namely that the one-way substitutability in favour of Category A machine gambling will emasculate existing arcade and machine gambling in Blackpool. Due to regulatory restriction limiting the licensing of different categories of gambling machines and the absolute restriction on the provision of Category A machines outside of the regional casino, we consider that there are absolute barriers to entry in the market for adult gambling machines such that customers, once lost to the regional casino's Category A machines, cannot be recovered through competition. Given the uniquely high concentration of gambling businesses in Blackpool, the introduction of the casino may create and permit abuse of a dominant position contrary to competition law.

#### **4. NEED FOR THE BEST POSSIBLE TEST OF SOCIAL IMPACT**

We address the principal consideration for the CAP in evaluating Blackpool Council's bid, namely that it must examine in close detail and evaluate with careful inquiry whether Blackpool provides the best location to test the social impact of the regional casino.

##### Blackpool Council's Bid Document

- 4.1 We summarise Blackpool Council's submissions on the town's suitability to monitor the social impact of a regional casino, as follows:
- 4.1.1 It is suggested that Blackpool's characteristics and local market (across the Fylde Coast, with a cross section of socio-economic conditions) offers a population base which will exhibit the effects of social and economic impact. That population will provide merely 10% of casino visits, the remaining 90% being visitors from outside the city and region.<sup>6</sup>

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<sup>6</sup> Blackpool Bid Document Summary at Page 1.

- 4.1.2 It is suggested that the 10% of casino visits from the local area will offer a contained and easily measurable population, on which Blackpool has supposedly compiled baseline material. It is suggested at Section 2.5 of the Blackpool Bid Document that Blackpool will monitor health and social impacts of gambling and develop a monitoring framework.<sup>7</sup>
- 4.1.3 It is suggested that Blackpool Council will have in place awareness and treatment programmes to deal with increases in problem gambling, and is working with the local constabulary (but has yet to determine how) to deal with issues of public safety and crime.<sup>8</sup> These corrective resources will supposedly be drawn from funds available from the estimated wealth generated by the sole regional casino.<sup>9</sup>
- 4.1.4 Blackpool Council's bid document refers to six joint agency strategies aimed, predominantly at tackling crime, substance abuse and antisocial behaviour, as examples of strategies to ameliorate social impacts of activities similar to the proposed casino development.<sup>10</sup>
- 4.1.5 It is suggested, based on a report commissioned from IPSOS/MORI, that Blackpool's gambling prevalence and problem gambling correspond to the national average and will be mitigated by a Gambling Forum, unspecified (save for the RIGT awareness materials for schools) awareness and education campaigns, unspecified social responsibility policies, non-particularised licensing and enforcement powers and palliative strategy for "Gambling Harm Reduction in Blackpool" trialling unspecified "brief interventions" and counselling and treatment services.<sup>11</sup>
- 4.1.6 It is suggested that there is widespread support for Blackpool Council's Masterplan proposals and, further, implied that this support extends to the casino development contemplated in the bid to the CAP.<sup>12</sup>

Our objections:

- 4.2 We believe that, contrary to Blackpool Council's submissions, Blackpool is in fact a wholly inadequate location in which to test the social impact of a regional casino. In this respect, Blackpool Council's proposal makes various important omissions and, in its generality,

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<sup>7</sup> Ibid., Section 2.5 at Page 6.

<sup>8</sup> Ibid., Summary at Page 1.

<sup>9</sup> Ibid., Section 2.2 at Page 5.

<sup>10</sup> Ibid., Section 2.6 at Page 7.

<sup>11</sup> Ibid., Section 2.3 Pages 5 and 6.

<sup>12</sup> Ibid., Summary at Pages 1 and 2.

lacks highly relevant detail which must be taken into consideration when evaluating the town's appropriateness as a location and test-bed for the social impact of a regional casino. We note in this connection that there is no evidence of Blackpool having commissioned an independent Social Impact Assessment. We seek to correct the, in our view highly partial and generalised, submissions put forward by Blackpool Council with a critique of its proposal and by addressing omissions from the proposal which the CAP must take into account in making its determination of the suitability of Blackpool as a test bed for social impact, as follows:

#### 4.3 **Testing the social impact of a regional casino – Blackpool is unique:**

4.3.1 Blackpool is a unique town within the United Kingdom as a historic and popular seaside resort in the North West of England. It has a number of attractions, principally amongst these are the amusement and gaming centres along the Promenade – from Blackpool Tower to the Pleasure Beach. To quote ReBlackpool, gambling is an intrinsic part of the resort product.<sup>13</sup> According to ReBlackpool's recent update on the Blackpool Masterplan, there are 6,000 machines within the resort core of which 50% are gambling machines.<sup>14</sup> The Golden Mile runs from the Pleasure Beach to the North Pier but the attractions are substantially polarised. The Pleasure Beach, to the South, is Britain's busiest tourist attraction but the focus of gambling activity is to the North of the Central Pier (though two of the area's casinos, the Paris and the Grosvenor, lie between the Pleasure Beach and the Central Pier and there are amusement arcades with both "family" and "adult" gaming facilities on the South Shore).

4.3.2 The Central Pier itself offers extensive fruit machine gaming and adjacent to it and to the North are the "Fun Palace", "Happy Dayz", the "Golden Pyramid", the Oasis (an extension of Trussards and holder of a casino licence although it is only part open), "Funland", "Mr T's", "Coral Island", The Tower and the North Pier. All these facilities rely substantially, or to a significant extent, on fruit machine gambling. For instance, at Coral Island, while detailed statistics are not available, we estimate that 70% of all fruit machine income, whether generated from "adult only areas" or elsewhere is spent by adults. Indeed, in the area surrounding the proposed casino site, there are already around 25 amusement

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<sup>13</sup> The Blackpool Resort Masterplan, by ReBlackpool, update brochure as at February 2006

<sup>14</sup> Ibid.

arcades, 5 bingo halls, 4 licensed casinos, as well as a number of Licensed Betting Offices.

4.3.3 We do not believe that a town in which gambling and machine-based attractions already have (and have had for over 30 years) an overwhelming presence can be considered a suitable area to conduct a pilot study of the social impact of the introduction of regional casinos in the UK. That is particularly so given that the primary commercial attraction of “regional casinos” is the monopoly right to provide Category A slot machines which self-evidently will have an overwhelming competitive advantage over existing machines available to the adult market. It is in our view self-evident that a pilot study intended to scope the likely effects of the introduction of regional casinos throughout the UK would be best conducted in an area broadly representative of the social, business and economic mix found at most likely sites for a regional casino (judging by the bids currently short listed before the CAP, these would be principally large urban centres irrespective of their existing tourist trade).

4.3.4 Blackpool is not a representative area. In fact, as outlined above, it is unique within the UK with its already high prevalence of and reliance on gambling and gaming businesses. Testing the impact of the regional casino in Blackpool would be unlikely to produce results which could be relied upon with any confidence to anticipate the likely social impact of further regional casinos in likely candidate areas such as Glasgow, Manchester, Newcastle, Cardiff or Sheffield. Not only do these cities have a significantly higher population but their leisure economies are far less reliant on gambling and those gambling interests which exist are not, as in Blackpool's case, concentrated at or adjacent to the very site upon which a regional casino would be likely to be developed.

We seriously doubt, therefore, how any baseline material which Blackpool Council indicates it has assembled<sup>15</sup> could be considered suitable pilot study baseline material given the already high presence of gambling businesses in Blackpool.<sup>16</sup>

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<sup>15</sup> Note: we cannot verify the nature or suitability of such data because it is not referred to in its bid proposal.

<sup>16</sup> Further, we note that the fact that Blackpool may have gathered such data ought not to place it at an advantage over the other proposals being considered by the CAP: after all, the data required for the pilot study will need to be gathered by reference to the anticipated study and, indeed, there is sufficient time for such data gathering given the measured timetable for implementation of the Act.

#### 4.4 **Testing the social impact of a regional casino – measuring impact:**

##### *Demographic issues:*

- 4.4.1 We anticipate that the pilot study of the impact of a regional casino will wish to monitor the local population as closely as possible, for which it will be preferable to monitor a substantial sample and a broadly representative cross-section of young persons and adults. Blackpool is, we submit, unsuitable in this respect because the profile of the population is insufficiently diverse.
- 4.4.2 Blackpool Council states in its bid that the city's resident population is around 142,700<sup>17</sup>. The Blackpool Bid Document provides no data for the age profile of the 142,700 residents in the city. We note that in a separate document (Blackpool Council's Sustainability Appraisal of Conference Leisure Quarter dated April 2006) it is stated that the population is clustered around the higher and lower age groups. We note that whilst NERA Economic Consulting's analysis<sup>18</sup> differs on this point, there appears to be consensus that the Blackpool area has a disproportionately large population of adolescents. Unless it is envisaged that future regional casinos will be built in towns with such a distinct population profile, data from Blackpool is unlikely to be reliable in evaluating the impact of further regional casinos – such data would be plainly inadequate in anticipating the social impact of a regional casino in at least six of the eight locations currently short listed before the CAP<sup>19</sup>.
- 4.4.3 Blackpool Council estimates that 90% of the regional casino's clients will be visitors. As both NERA Economic Consulting and Professor Griffiths observe in their research<sup>20</sup>, the high level of visitors expected as a proportion of the casino's customers will lead to difficulties in monitoring social impact (including monitoring any educational programmes set up to alleviate problem gambling) and, in turn, translating the results of the research in Blackpool to future candidate areas in the UK where visitor rates may be lower.

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<sup>17</sup> Blackpool Bid Document, op. cit., at page 2 (footnote 2 refers to the Office for National Statistics data for 2002)

<sup>18</sup> NERA, op. cit., Section 3.

<sup>19</sup> Ibid., paragraph 5.5.5

<sup>20</sup> Ibid., page 77; and Griffiths, op. cit., 27.

*Transience:*

4.4.4 In its written evidence to the OPDM (prepared in April 2006<sup>21</sup>), Blackpool Council described how Blackpool is second only to London in the high levels of transience of its local population. Transience describes the movement of people with a degree of residential mobility which frequently accompanies a chaotic lifestyle. The 2001 Census revealed that using commonly accepted criteria, 11% of Blackpool's population could be classified as transient.<sup>22</sup> A key problem, as noted by Blackpool Council in its submission to the ODPM, created by the population's pattern of movement between properties is that this movement perpetuates a culture of using temporary addresses on a short term basis and creates tracking problems for the agencies on which this group of people rely for support. The same problems would arise in the context of any study into the social impact of the casino in Blackpool and we are concerned that Blackpool has not addressed this issue in its proposal to the CAP.

*Isolating the effects of the regional casino:*

4.4.5 This issue is considered in further detail at section 5 below. However it is worth noting that Blackpool's Masterplan and ReBlackpool (the Urban Regeneration Company established in February 2005) envisage a number of regeneration projects for Blackpool. There are several regeneration projects currently underway in the city and many more in the pipeline – including, the Talbot Gateway project<sup>23</sup>, a bid for £21 million Lottery funding to create the "People's Playground" renovating the sea-front<sup>24</sup>, development of the airport, environmental improvement to Seaside's Way and the town centre extension. In terms of the inter play between the benefits of "regeneration" and negative social impact, notably the problems associated with problem gambling, this poses difficulties in isolating and measuring both the social impact of the casino, and any regenerative benefits.

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<sup>21</sup> See Memorandum by Blackpool Council prepared for the Select Committee on ODPM: Housing, Planning, Local Government and the Regions (Written Evidence).

<sup>22</sup> Ibid., paragraph 4.2

<sup>23</sup> See ReBlackpool website at [www.reblackpool.com/detail.aspx?id=41](http://www.reblackpool.com/detail.aspx?id=41)

<sup>24</sup> See ReBlackpool Press Release dated 12 January 2006

#### 4.5 Testing the social impact of a regional casino – levels of pre-existing Problem Gambling in Blackpool:

- 4.5.1 It is a key part of the Government's agenda for the implementation of the Act that the vulnerable be protected from harm.<sup>25</sup> Indeed the desire to restrict the number of regional casinos licensed under the Act and to measure their impact is informed by just such a consideration.
- 4.5.2 An unduly high proportion of Blackpool's population appears extremely vulnerable in this context not least because the town suffers from social deprivation.<sup>26</sup> As observed in Professor Griffiths's report, Blackpool's assertion that "gambling prevalence and problem gambling in Blackpool correspond to the national average" is questionable.<sup>27</sup> Endnote 37 to Blackpool's Bid Document indeed confirms that the IPSOS/MORI survey is not statistically robust yet the Council relies on this study, not only as part of its baseline assessment of likely social impact, but also, in turn, to inform "[its] economic impact assessment [which] assumes that casino gambling prevalence will fall within the range of 14% to 18%".<sup>28</sup>
- 4.5.3 Thus, two central points of the Council's bid appear to rely on a statistically inadequate survey. As both Professor Griffiths and NERA observe in their research, the impact of 1250 Category A slot machines, untested in the UK, represent a much greater risk to levels of problem gambling than any gambling product currently available in the UK. Both the number of the machines and the unlimited stakes and prizes stand them apart and mean that their easy accessibility is likely to induce additional problem gambling to a much greater extent than accessible gambling products of the sort hitherto available in the UK, from casinos to betting offices.
- 4.5.4 Of particular concern is the introduction of Category A gambling machines which will almost certainly have negative consequences by increasing problem gambling rates. Furthermore, the greatest risks are likely to occur in those places

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<sup>25</sup> Casinos: Statement of National Policy, dated 16 December 2004, paragraph 2

<sup>26</sup> "Blackpool's Regional Casino: Does Blackpool represent 'the best possible test of social impact' for a regional casino – a critique of psychosocial impact" by Professor Mark Griffiths, Section 3

<sup>27</sup> Ibid., Section 9

<sup>28</sup> Blackpool Bid Document, *ibid.*, page 6

where vulnerable individuals at risk from developing problem gambling have easy access to Category A gaming machines<sup>29</sup>.

4.5.5 In that regard, the Blackpool bid identifies, in effect, a single site for a regional casino. Uniquely, this site is both adjacent to (indeed, it is partly within) the Town Centre and immediately adjacent to "... 18 [out of 25] (localities which) are in the most deprived 10% of all lower-layer super output areas in England".<sup>30</sup> It is also at the heart of the resort in terms of its visitor market. Accordingly, in terms of both residents and visitors Blackpool Council's bid assumes a regional casino that will be far more "accessible" than those envisaged by competing bids. As Professor Griffiths points out, that degree of "accessibility" to a regional casino will have a direct and negative impact on problem gambling. That factor will increase the negative "social impact", offset any benefits of regeneration and make the results of any survey in Blackpool less applicable in the context of the later anticipated licensing of regional casinos in other areas of the UK.

4.5.6 There is, of course, a tension between the need to protect those vulnerable to problem gambling (i.e. particularly the socially and economically marginalised) with the desire to bring the benefits of regeneration to a particular area. We submit that the CAP must have regard to the manner in which this tension is resolved in the CAP's Terms of Reference where regeneration is, in our view correctly, a secondary criterion for the location of the regional casino. Regeneration should not be at any cost, certainly not at a cost which impacts upon the most vulnerable most seriously. We submit that, in its eagerness to demonstrate the deprivation in its town and need for regeneration in Blackpool, the Council has failed to address the question of the likely high levels of problem gambling anticipated with the introduction of a regional casino containing a unique and untested class of gaming machine the impact of which is likely to far exceed that of the UK's current restricted types of machine.

#### 4.6 **Testing the social impact of a regional casino – dealing with Problem Gambling:**

4.6.1 Blackpool Council's submissions to the CAP state that "International research suggests that higher prevalence does not necessarily lead to an increase in problem gambling so long as it is accompanied by accessible educational

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<sup>29</sup> Griffiths, op. cit., Section 6.

<sup>30</sup> Blackpool Bid Document, *ibid.*, page 4 paragraph 1.4.

programmes for residents and visitors and the provision of services for problem gamblers such as those we are planning to introduce in Blackpool".<sup>31</sup>

4.6.2 We are concerned that this statement (together with the very general summary of Blackpool Council's intended programmes and services at sections 2.3 and 2.4 of the Bid Document) betrays a naivety and consequent lack of preparedness for the likely negative impact of a regional casino in Blackpool. As is recognised in the Government's "Gambling Review Report"<sup>32</sup>, claims that it is possible to increase the prevalence of gambling (in the present case, with the introduction of Category A machines) without increasing problem gambling do not withstand scrutiny against the weight of evidence the other way. Further, the Government's report identifies the need to have "strong systems in place to provide problem gambling services"<sup>33</sup> in order to militate against increases in problem gambling. Blackpool Council's proposals are, in turn, insufficiently specific and, in any event, of a sort now becoming increasingly common across the country, regardless of the prospective presence of a regional casino, for example:-

- (A) Blackpool Council's draft Statement of Licensing Policy<sup>34</sup> proposes the usual controls focussed on gambling businesses to regulate access by young persons to adult gambling areas. It contains no information on the proposed "awareness and education campaigns"<sup>35</sup> or "social responsibility"<sup>36</sup> policies supposedly contained in the draft Statement of Licensing Policy. The Gambling Forum which Blackpool Council refers to is a group of operators and public agencies assembling to discuss gambling licensing and social responsibility issues. Forums were established in most areas in which we operate during the 1980's and 1990's. While supported by operators and, in particular, our industry's trade association BACTA, their efficacy has been limited.
- (B) Blackpool Council's Local Area Agreement ("LLA") is aimed at addressing issues of deprivation (principally in relation to young persons) in Blackpool. On inspection, it is clear that the LLA, contrary to the

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<sup>31</sup> We have not had access to this research by P Collins which is referred to at footnote 28 of Blackpool Council's Bid Document.

<sup>32</sup> Ibid., paragraph 17.62 page 92.

<sup>33</sup> Ibid., paragraph 17.63 page 92.

<sup>34</sup> Blackpool Council, Draft Statement of Policy and Principles under the Gambling Act 2005

<sup>35</sup> Ibid., paragraph 2.3, page 6.

<sup>36</sup> Ibid.

implication in the Blackpool Bid Document (at paragraph 2.4), is not aimed at dealing with problem gambling – it contains no assessment of risk or need, no strategies, no budget allocation; it entirely ignores the problem in respect of both children and, importantly, adults. The LLA is focused on improving strategies for reducing teenage pregnancies, educational attainment in school, dealing with antisocial behaviour and improving community engagement.

- (C) Blackpool Council refers to a Gambling Harm Reduction Strategy at sections 2.3 and 2.4 of the Bid Document and endnotes 25 and 34. Little is revealed about this strategy – there is no assessment of the size of the problem or the likely cost and budget – unsurprising, perhaps, as the strategy is still in development. We submit that, in light of this, Blackpool Council's assertion (quoted at paragraph 4.6.1 above) that its provision of services for problem gamblers will militate against an increase in problem gambling with increased prevalence, is not justified when the provision designed to combat the harmful effects of increased prevalence has yet to be scoped or ascertained.
- (D) Blackpool Council states its intention to establish a Community Regeneration Fund "using approximately £1-2 million per annum for community based projects to help offer opportunities to local people and mitigate any problems caused by the regional casino"<sup>37</sup>. It is impossible to measure either the adequacy of the level of funds or appropriateness of the "projects" with no information as to their aims, size or scope – it is wrong, in our opinion, to suggest that a £1-2m Fund alone would ameliorate all the problems emerging from the regional casino. Furthermore, the suggestion, notwithstanding its unspecific nature, runs the risk of overlapping or even conflicting with programmes likely to be set up under the auspices of the RIGT.

#### 4.7 **Further reasons why Blackpool is unsuitable test bed for social impact:**

*Comparison of the Blackpool bid with other short listed bids before the CAP:*

We acknowledge that the measure of the best test for social impact is relative and must be judged in light of the other proposals considered by the CAP. This is a matter for the CAP

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<sup>37</sup> Ibid., section 2.4 page 6.

to opine on in light of all representations relating to the other proposals. However, even on a simple review of the other proposals before the CAP it is clear that, in contrast to Blackpool:

#### Greenwich

4.7.1 Greenwich Council commissioned an expert, Pricewaterhouse Coopers, to evaluate the social impact of the regional casino as detailed in its bid. In its bid, the Council acknowledges that "problem gambling is the social risk with the highest potential impact and the highest level of uncertainty". Greenwich Council has identified a large list of measures to mitigate the negative impacts of the regional casino, including commitments from the intended operator that the absolute minimum revenue is derived from problem gamblers and they will create a centre to provide support and counselling for dealing with the social impacts arising from the development, such as problem gambling, including internet gambling.<sup>38</sup>

4.7.2 The proposed site is within the O2 Dome (formally the "Millennium Dome"). It is not immediately adjacent to low cost housing and indeed is bordered on three sides by the river Thames. It is some distance from London City Centre or any other town centre and aims to continue to be a destination location. It is not adjacent to low cost housing and there would therefore seem to be little prospect of material ambient use.

#### Glasgow

4.7.3 Glasgow City Council's bid document to the CAP is up-front and realistic about the potential for increased access to gambling and anticipated increases in problem gambling. Having commissioned a study of problem gambling by Dr Gerda Reith, Glasgow has developed a host of specific and, in contrast to Blackpool, detailed strategies to combat problem gambling as set out at section 2.5 of their bid document: for instance, a Debt Strategy, a Financial Awareness Strategy<sup>39</sup> and a Community Development Finance Institution. Further Glasgow City Council refers to specific relationships set up to deal with negative impacts from a regional casino: for instance, it is engaged in a discussion with the RCA Trust (a gambling counselling service in Scotland, also affiliated to GamCare) to

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<sup>38</sup> Greenwich Proposal to the CAP, section 2.3.2 page 6.

<sup>39</sup> "Financial Awareness Strategy: Tackling Financial Exclusion through Advice, Information and Education" - see [www.glasgow.gov.uk/NR/rdonlyres/18BF156A-49AE-44E5-9A55-](http://www.glasgow.gov.uk/NR/rdonlyres/18BF156A-49AE-44E5-9A55-)

link their service to the Glasgow Advice and Information Network run by the city already and the city is also liaising with Gambling Anonymous to link up with the City Council's debt advice and counselling services.

4.7.4 There are four proposed sites. All but one appear to be at some distance from low cost housing:

- (A) Glasgow Harbour. The site is away from the City Centre. It is a redevelopment of former ship yards, docks and warehouses on the north side of the Rivers Clyde and Kelvin. The expressway is to the north, the SECC is to the east and the Clyde Tunnel is to the west. The immediate area is not one of low cost housing and given the precise location of the site there would seem little prospect of material ambient use.
- (B) The SECC area (QD2). This is a redevelopment of the SECC site itself and is not in the City Centre. It is bordered by the river to the south and the expressway to the north and is not immediately adjacent to any low cost housing. As such there would seem little prospect of material ambient use.
- (C) St Enochs: This location is adjacent to Argyle Street Station but away from the core retail area. It is not immediately adjacent to low cost housing. Although it would be unlikely to give rise to material ambient use, passing traffic to and from the station may exacerbate that risk.
- (D) Ibrox. This is an application for the redevelopment of Ibrox football stadium. This is not a City Centre location, but it is based in an area of low cost housing and would therefore seem to attract a higher risk of ambient use.

#### Manchester

4.7.5 Manchester City Council has also commissioned independent advice on ways in which casino operators can be required to implement robust mechanisms to reduce problem gambling<sup>40</sup>. Further, it has set up a Responsible Gambling Unit within the Chief Executive's Department to coordinate the activities of the community, voluntary and statutory sectors and to develop strategies on research,

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<sup>40</sup> Manchester City Council – A proposal to license a regional casino at Sportcity, East Manchester, section 3.

prevention and treatment of problem gambling.<sup>41</sup> Unlike Blackpool Council, Manchester City Council makes no claims that problem gambling will not increase. In fact, it appears prepared with specific projects and measurable aims to deal with anticipated increases in problem gambling which will accompany the regional casino.

- 4.7.6 The location is in East Manchester and not in the City Centre. Although we have been unable to fully assess the site's ambient accessibility to vulnerable sections of nearby communities, our understanding is that the site would not be materially susceptible to the risks of ambient gambling.

### Cardiff

- 4.7.7 Cardiff offers a diverse city where it would be possible to conduct a meaningful pilot, enabling the social and economic impact of the development to be examined and understood on a whole range of varied communities within the city thereby acting as a template for other areas in the UK.<sup>42</sup>

- 4.7.8 Further, the anticipated location of the regional casino, in a self-contained destination resort in the now-derelict former Cardiff Bay docks<sup>43</sup>, would be located away from existing residential, leisure and recreational activities, perhaps reducing the risk of problem gambling amongst the local population. Cardiff's proposed casino operator has a Formal Policy for Identifying Problem Gamblers that includes a Responsible Gambling Programme and a Customer Care Code of Conduct<sup>44</sup>.

### Newcastle

- 4.7.9 Newcastle City Council's submission devotes five pages to outlining its strategies for minimising negative social impact. As with Manchester and Glasgow's bids, Newcastle commissioned a social impact assessment and includes in its bid a list of the extensive recommendations for problem gambling mitigation strategies at page 9 of its submission.

- 4.7.10 The suggested site is located in the new "Discovery Quarter". The precise locations are not identified but the general area is described as being on the

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<sup>41</sup> Ibid., section 3

<sup>42</sup> Cardiff Council – Regional Casino Submission dated March 2006, paragraph 8.1.2 at page 20.

<sup>43</sup> Ibid., paragraph 1.5.2 page 5.

<sup>44</sup> Ibid, paragraph 2.2.3, page 7 and see further details at [http://212.58.240.36/1/hi/wales/south\\_east/4533000.stm](http://212.58.240.36/1/hi/wales/south_east/4533000.stm)

Western edge of the City Centre and located between the commercial/retail core of the City and several inner western neighbourhoods which have significant levels of unemployment and other deprivation. The proposal states however that the precise location of the specific sites identified by developers and the physical constraints on access to them are able to mitigate the risks of ambient gambling. From our knowledge of the area, we can confirm that assessment.

### Sheffield

4.7.11 Sheffield's socio-economic profile broadly reflects that of the UK as a whole with the percentage of people of working age and levels of education and qualification in line with UK averages.<sup>45</sup> Further, Sheffield already has in place a social monitoring framework, the Sheffield Neighbourhoods Information System (SNIS) a multiple domain indicator-based index, used to monitor changes in the city's 100 local neighbourhoods. The City Council has established a "Sheffield First Partnership Casino Task Group"<sup>46</sup> to identify the practical steps which the city needs to take to mitigate the potential negative impacts of the regional casino in the city including locating the casino away from residential areas, developing a comprehensive programme of public information education and promoting high quality counselling services for problem gamblers and their families<sup>47</sup>.

4.7.12 There are three proposed locations:-

- (A) Adjacent to Meadowhall Shopping Centre. The proposed site is to the north east of the shopping centre., between the river and the M1, across the motorway from the sewage works. It is not adjacent to housing and its proximity to the shopping centre is unclear. However, as we understand the position, it will be located such that ambient access will not be significant.
- (B) The redevelopment of Don Valley Stadium in Attercliffe Common/Road in the Lower Don Valley. There is little residential development in the area and as such significant ambient use seems unlikely.
- (C) Bramall Lane. This location is adjacent to Sheffield United's current football ground. It is not in the immediate City Centre but it is in a residential/mixed use area which includes low cost housing.

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<sup>45</sup> Sheffield City Council – Proposal to the CAP, paragraph 1.5 page 5.

<sup>46</sup> Ibid., section 2.1 page 6.

<sup>47</sup> Ibid., section 2.5 page 10.

#### 4.8 **Conclusions in relation to social impact:**

- 4.8.1 Blackpool Council's analysis of its own proposal is in our view highly partial and generalised and lacks highly relevant detail which, when investigated, reveals that Blackpool does not offer the best possible test of social impact and is in fact a wholly inadequate location in which to test the social impact of a regional casino.
- 4.8.2 Blackpool is a unique town in which gambling and machine-based attractions already have an unusual dominance and there are already high levels of social deprivation. There is no robust assessment of current levels of problem gambling, however we are concerned that Blackpool Council's submissions may understate the seriousness of the issue. There is a consequent lack of preparedness for the likely negative impact of a regional casino in Blackpool. This is in stark contrast to the other short-listed bids before the CAP.
- 4.8.3 Blackpool's population is insufficiently diverse and features high levels of transience. Blackpool is not an area which is broadly representative of the social, business and economic mix of most likely sites for a regional casino suitable for the pilot study.
- 4.8.4 As explained, the location proposed by Blackpool is wholly dissimilar to those proposed in other bids. In so far as “accessibility” and the potential negative effects of ambient gambling (on Category A slot machines) are associated, as Professor Griffiths suggests they are, then the Blackpool location, adjacent to and indeed partly within the town centre and adjacent to 18 highly deprived “localities”<sup>48</sup>, is inappropriate: it will both increase the risk of harm to the vulnerable, both residents and visitors, and represent an inadequate test because of its dissimilarity to the type of locations comprised in the other bids.
- 4.8.5 It is our view that although concerns about the link between “accessibility” and problem gambling have not proved to be substantial in the context of the more restricted forms of gaming (especially machine gaming) previously permitted in the UK, the advent of unlimited stake and prize machines, in very large numbers, that brings into focus this concern and, as Professor Griffiths has indicated applies with real force to the development of regional casinos.

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<sup>48</sup> Blackpool Bid Document, *op. cit.*, para 1.4

4.8.6 In the circumstances, we consider that a score of 8 out of 10 in relation to social impact in respect of the CAP's initial sifting process<sup>49</sup> was unduly high.

## 5. REGENERATION

5.1 The Government's December 2004 policy paper recognised that in certain circumstances the development of regional casinos may stimulate regeneration. We note that at that stage, the Government had proposed the licensing of eight regional casinos, now cut back to one. The Government has maintained this aim, noting in the CAP's Terms of Reference that in evaluating the location for the new regional casino it must include areas:

5.1.1 in need of regeneration; and

5.1.2 which are likely to benefit in these terms from a new casino.<sup>50</sup>

### Blackpool Council's Bid Document

5.2 Blackpool Council's submissions on the town's need for regeneration by means of the regional casino development are extensive; indeed, they are the principal focus of its bid proposal in direct contrast to the priority given to social impact in the CAP's terms of reference. We summarise the key points in Blackpool Council's proposals as follows:

5.2.1 Blackpool has experienced relentless decline in visitor numbers over the last 20 years and consequent economic decline in the tourist industry. The Council's bid states that the town's "basic industry, tourism, is in sharp decline that could prove terminal if action is not taken soon"<sup>51</sup>.

5.2.2 Blackpool has high levels of deprivation particularly in the town's inner wards. The Bid Document cites various statistics regarding the town's deprivation referring to high levels of unemployment and benefit claimants.<sup>52</sup>

5.2.3 Blackpool Council's proposals for regeneration centre on the development of a regional casino in conjunction with a series of further tourist and sea-side developments as outlined in its Masterplan (noted at section 3.1 of the Bid Document and contemplating the development of further resort casinos in Blackpool). The Council states its hope that the casino development and the anticipated later development of a cluster of resort casinos will create jobs and bring prosperity to local residents.

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<sup>49</sup> CAP: Table of moderated scores from initial sifting process – Regional ([http://www.culture.gov.uk/cap/documents/Table\\_moderated\\_scores\\_regional.pdf](http://www.culture.gov.uk/cap/documents/Table_moderated_scores_regional.pdf))

<sup>50</sup> CAP's Terms of Reference, op. cit.

<sup>51</sup> Blackpool Bid Document, cit., section 1.4 page 3

<sup>52</sup> Blackpool Bid Document, cit., section 1.4 page 4

5.2.4 Blackpool Council's objectives focus on the perceived inadequacy of the town's conference and hotel facilities.

Our objections:

We submit that the Bid Document's approach to the need for regeneration is flawed and that Blackpool is unlikely to benefit in these terms from a new casino for the following reasons:

**5.3 The decline in visitor numbers is, in our opinion, overstated and data on this issue in Blackpool's bid document may be unreliable:**

5.3.1 We estimate that our visitor numbers at Coral Island have risen steadily, about 10% per year, for several years. We have not, unfortunately, despite extensive searches been able to obtain reliable data on visitor numbers to Blackpool. In the course of our searches we noted that Blackpool Council's own visitor numbers vary across different policy and press documents such that it is difficult to ascertain the precise level and patterns of purported decline. We note, for instance, that, in its Bid Document to the CAP, Blackpool suggests that the decline in visitor numbers has been "relentless" over 20 years (13.2 to 10.7 million between 1983 to 2002)<sup>53</sup>. However, comparing these figures with those stated in Blackpool Council's New Horizon's document<sup>54</sup> Blackpool appears to have had 17m visitors per annum in 1989 – hardly the relentless decline suggested in the latter document. Further, we would point out that Blackpool's visitor numbers may in fact be hard to track because of the high number of day visitors so there is a serious risk that official figures based on overnight stays overstate the decline.

**5.4 Negative image of Blackpool is overstated by the Council:**

5.4.1 The negative image of Blackpool is overstated in Blackpool's Bid Document. Blackpool is still the most visited seaside resort in the UK.<sup>55</sup> We note that Blackpool Council relies on different statistics for visitor decline across various documents, such that it is difficult to be certain whether visitor numbers have declined to 9m or 11m as suggested across different Council literature.<sup>56</sup>

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<sup>53</sup> Blackpool Bid Document, op. cit., page 2

<sup>54</sup> Blackpool, New Horizons

<sup>55</sup> Blackpool Rejuvenated – The Blackpool Challenge Partnership, Section 1, See also the Audit Commission Economic Development Report on Blackpool.

<sup>56</sup> Refer to the NWDA's March 2003 paper, Blackpool Horizons documents, Masterplan update brochure dated February 2006 and Masterplan leaflets.

However, and in any event, the decline which Blackpool suggests is experienced across the Blackpool resort is, in fact, relative. There are still a large number of visitors and the resort remains vibrant across particular attractions such as Coral Island and the Pleasure Beach - both of which have benefited from investment. We have invested over £8m in Coral Island within the last three years and have plans to invest £4-£5m in the Palatine Building next door within the next twelve months.

5.4.2 The Council's own stance on Blackpool's image is equivocal. In the bid document, the Council talks down the town's image and states that it is in "terminal decline". Yet, in the Council's Draft Consultation Strategy for Blackpool's Visitor Economy 2006/2010, the thrust is more positive, it states:

- (A) "... the nation's Capital of Fun continues to attract millions of visitors every year" (page 5);
- (B) Blackpool boasts that "...the diversity of (its) visitor economy is immense" (page 11);
- (C) "there are already a number of positive initiatives underway, beyond the work of ReBlackpool, including the planned restoration of Stanley Park, the development of a National Seaside Heritage Centre and a bid to UNESCO for Blackpool to be awarded World Heritage status..." (page 12);
- (D) "it is vital that our approach is evidence-based, market driven and consumer focussed" (page 14);
- (E) One of the five "key strategic themes" that guide the Council's strategy is "Blackpool and its Enduring Brand Strength" (page 14); and
- (F) "Blackpool is a strong and resilient brand with a resonance amongst consumers of all ages..." (page 16).

**5.5 Blackpool Council's estimates of the impact of regeneration are predicated on the assumption that the original vision in the Masterplan of a cluster of a number of regional casinos will follow the initial phase of development of the sole regional casino – this assumption is unsafe and, consequently, the economic benefits of the regional casino are overstated:**

- 5.5.1 Blackpool's Masterplan presents a footprint for the development of the leisure and tourism industry in Blackpool. The Blackpool Masterplan focused on the potential development of four casino resorts within four key quarters<sup>57</sup>:
- (A) the Pleasure Beach - to include attractions such as a glass aquarium, an 800 room casino resort hotel and an open-air event park for live entertainment;
  - (B) the Town Centre - to include the development of new shopping facilities, civic and office buildings, 300 houses/apartments, 3 new hotels and a conference centre and entertainment complex;
  - (C) the Central Beach - to include attractions such as a glass covered leisure complex incorporating a casino resort hotel surrounded by a ring of other hotels offering 1,800 rooms of four and five star standard; and
  - (D) the Village - to include the restoration of the Victorian character and aspects of Blackpool.
- 5.5.2 The Blackpool Masterplan was published in 2003 when it was envisaged that the liberalisation of the UK gaming industry would result in the licensing of a number of resort casinos and anticipated that Blackpool would bid to host at least four of these casinos. The job opportunities and economic benefits predicted to flow from the realisation of the Blackpool Masterplan were estimated at 14,500 jobs at £414 million spend.<sup>58</sup>
- 5.5.3 Blackpool Council's Bid Document implies that the award of the right to licence the sole regional casino will fulfil the aims of the Masterplan. We submit that this is misleading since the Masterplan and the regeneration benefits expected to flow from its realisation depend on four resort casino developments and cannot be expected to arise from one regional casino. We refer to NERA Economic Consulting's conclusions which indicate that the scale of benefits may be significantly smaller than the 2,500 to 3,400 jobs indicated in Blackpool Council's submission to the CAP.<sup>59</sup>
- 5.5.4 Further, we consider that underlying Blackpool Council's bid (and the regeneration benefits which it hopes for in its Masterplan and Bid Proposal to the CAP) is the assumption not only that the Government will in due course award

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<sup>57</sup> Blackpool Masterplan Prospectus.

<sup>58</sup> See Lancashire West, Overview of Resort Casino Impact Study and Action plan, June 2003.

one or more further licences for additional resort style casinos but that Blackpool will receive at least one if not more than one of those further licences – something which, in light of the intention to pilot the regional casino, prejudices the outcome of the research and social impact testing of the regional casino. As indicated above, our view is that the local population in Blackpool will suffer disproportionately from the location of the regional casino in their midst. If, following the award of the right to host the regional casino in Blackpool, no further regional casinos are licensed for the town but are instead licensed in other parts of the UK, the regional casino experiment in Blackpool will have floundered. The effects will be particularly felt in Blackpool because its Council has become ever more committed to casino development as the means for regeneration; declining to consider or even turning away other tourist and conference developments to regenerate the town.

5.5.5 It must not be overlooked that the alleged local support for the casino development is in fact support which was garnered for the Blackpool Masterplan and the vast transformation that the Council asserted would flow from its cluster of four resort casinos.<sup>60</sup> Blackpool is mistaken, therefore, to assume in its proposal to the CAP that large investment will follow the regional casino, and that local support is the same for a single regional casino which does not offer the scope for regeneration benefits and economic renaissance envisaged in the Masterplan.

## 5.6 **Employment benefits are overstated:**

The scale of benefits for a single casino in Blackpool appear to be significantly smaller than the 2,500 to 3,400 jobs indicated in Blackpool's submission to the CAP<sup>61</sup>. Furthermore, we submit that it is not clear that the jobs created by a regional casino in Blackpool will contribute towards increasing economic activity within the targeted wards. This is because the jobs are not particularly suited to the needs of local residents (re)entering the labour market. The jobs may attract migrant workers from other parts of the UK or Eastern Europe and any additional jobs may simply substitute for existing

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<sup>59</sup> NERA, op. cit., section 4 conclusions at page 41.

<sup>60</sup> Blackpool Bid Document, op. cit., section 4.6 at page 12.

<sup>61</sup> NERA op. cit., section 4.8

employment. We refer you to NERA Economic Consulting's conclusions on the likely economic impact of the regional casino in Blackpool for further detail on these issues.<sup>62</sup>

**5.7 The elimination of competition in the market for adult gambling with the introduction of the regional casino will impact the town significantly and undermine the regeneration benefits of the casino:**

5.7.1 Blackpool's Bid Document does not adequately address the impact which a regional casino, located – as is proposed – in the town centre, would have on the local gambling and other leisure businesses. Blackpool Council claims in its proposal that:

- (A) Existing casinos will "develop their boutique service role through changes brought in by the 2005 Act";
- (B) "Existing seaside arcade operators believe that casino led regeneration will have positive local impact: the potential for substitution is thought to be limited, while trade should benefit from growth in visitors and a more year-round spread. This view is not shared by arcade operators with town centre and edge of centre premises which are used regularly by local residents."

5.7.2 In fact, the regional casino will draw away key adult slot machine customers through the regional casino's monopoly rights to host up to 1,250 Category A machines under the Act for the following reasons:

- (A) *Elimination of competition:* The establishment of a regional casino in Blackpool will poach the majority of adult gambling customers from the other gambling businesses in Blackpool. As described at paragraph 4.3.2 above, Blackpool has over 34 gambling businesses in the vicinity of the proposed site for the regional casino alone. While many of these gambling businesses cater for "families", they all cater for adults. The gambling products offered in these businesses (principally slot machines for low or restricted stakes and prizes) will be unable to compete with unlimited stake and unlimited prize Category A machines due to be introduced in large numbers (1,250) in the regional casino.

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<sup>62</sup> NERA, *op. cit.*, section 4; see also the Hall Aitken report entitled "The social and economic impacts of regional casinos in the UK", February 2006

(B) *Product Market:* We consider that the relevant product market is the market for machine gambling (irrespective of size of stake and/or prize) due to high demand-side substitutability between all categories of machines. Within this market, the introduction of Category A machines are more attractive to customers than lower stake lower prize machines offered in other gambling establishments and are likely to take the market share of customers.

(C) *Demand-side substitutability:* Seaside arcade operators, like casino operators, offer different categories of gambling machines but a substantial and critical part of their business is focussed on adult gambling in particular on fruit machines, Fixed Odds Betting Terminals (FOBTs), and other restricted stake and low prize gaming.

As you are aware, an assessment of the likely impact of the introduction of up to 1,250 Category A machines in the market for adult gambling custom in Blackpool, involves a determination of the range of products viewed as substitutable by the consumer.

We consider that there is high demand-side substitutability for customers playing in (1) existing casinos and (2) arcades offering limited stake and prize slot machines which would draw them away from such machines to the unlimited stake and unlimited prize Category A machines being offered by the regional casino.

(D) *Supply-side substitutability:* There is no supply-side substitutability in the provision of Category A machines since these would be permitted solely in the regional casino. The effect of this would be to leave existing gambling businesses powerless to win-back customers to their gambling machines.

(E) *Geographic Market:* Our view is that it is a national market and that the sole regional casino in Blackpool would draw visitors from throughout the North. Furthermore, there will be a direct impact upon some amusement arcades which are knocked down to make way for the regional casino and an adverse effect upon the trade of the other casinos and arcades which are in close geographical proximity to the regional casino.

(F) *Barriers to entry:* Due to regulatory restrictions limiting the licensing of different categories of gambling machines and the absolute restriction on the provision of Category A machines outside of the regional casino, we consider that there are absolute barriers to entry in the market for gambling machines such that customers, once lost to the regional casino Category A machines, cannot be recovered through competition.

5.7.3 To summarise, our view is that the regional casino will be an overwhelming threat to existing businesses offering adult machine gambling and that the one-way substitutability in favour of Category A machine gambling will emasculate existing arcade and machine gambling in Blackpool. Of course, the impact of a regional casino is not the same in other areas of the country where no such concentration of gambling businesses exist.

**5.8 Blackpool's reliance on casino-driven regeneration has been overstated:**

5.8.1 Blackpool Council states at section 3.1, page 9 of its Bid Document, that "without regional casino development decline will continue to accelerate". We submit that this statement and, indeed, the emphasis on alleged regenerative effects of the regional casino, overstate Blackpool's true reliance on the bid. We do not accept this claim for two reasons:

(A) First, to focus on regeneration by one project alone would be a departure from previous statements and indeed from the purpose of Re Blackpool, as a URC, and

(B) Second, it is an unrealistic representation of Blackpool's prospects for regeneration by other means.

5.8.2 In relation to our first ground for objection, we understand that ReBlackpool's proposal to the ODPM on which it secured URC status is broader than the casino proposal and, indeed, envisages regeneration by means other than casino development.<sup>63</sup>

5.8.3 In relation to our second ground for objection, we note that the casino is not in fact the sole regeneration project envisaged for or indeed underway in Blackpool: we note that high profile projects such as the £30m extension of the Town Centre; the transformation of Seaside's Way, the main access to the resort; the

redevelopment of the Talbot Road area; the reconstruction of the seafront promenades; state of the art additions to the Pleasure Beach; modernisation of the seafront tram and expansion of the airport are underway.<sup>64</sup> The Talbot Gateway project, for instance, at the north eastern edge of the existing town centre is underway and aimed at creating high quality retail, civic, cultural and administrative development including public spaces for pedestrians, shops, offices and residential apartments and transport integration.<sup>65</sup>

5.8.4 We agree that:

- (A) The town and its leisure offering do require “regeneration”;
- (B) There is a “declining demand for Blackpool’s huge stock of small hotels and guesthouses” and, of course, new and better hotels would be welcome; and
- (C) There is a need for a new conference centre.

5.8.5 However, given that Leisure Parcs instigated the “resort casino” debate even prior to the Budd report and noting that that company owns all three Piers, the Winter Gardens, the Tower complex and the significant length of the frontage which would be taken up by the first, and probably the only, phase of the prospective regional casino development, it is perhaps no wonder that since the late 1990’s Leisure Parcs appears to have elected to postpone significant investment in its assets. Indeed, the former Oasis amusement arcade was to have been the subject of a significant casino investment by London Clubs International. Although that company appears to have suspended or withdrawn its interest, one of its senior personnel commenting as recently as May said that this was because of the uncertainty surrounding the regional casino bid. In short, Blackpool’s Master Plan has blighted investment more than it has encouraged it. Indeed, the Council is resisting Leaguenotion’s attempt to invest £4-£5m in the Palatine Building notwithstanding that the first, or probably the only phase of the suggested regional casino development will be on a quite separate part of the allocated site. There is no prospect of later phases of the development for many years.

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<sup>63</sup> In this respect we refer, by way of example, to "ReBlackpool URC the NWDA submission to the ODP and DTI" which outlines, inter alia, various regeneration opportunities on which it was intended the URC would focus on, including tourism, retail, office, airport, conference market and housing.

<sup>64</sup> Masterplan Prospectus, op. cit., page 3.

<sup>65</sup> See ReBlackpool website [www.reblackpool.com/talbot\\_road.aspx](http://www.reblackpool.com/talbot_road.aspx)

- 5.8.6 Given the decline in conference business, a matter falling primarily within the Council's remit, and the ascendancy of the day visitor market, it is similarly no surprise that demand for the town's "... huge stock of small hotels and guesthouses" has declined. Nevertheless, a number of national and international hotel operators are represented in Blackpool. It is noteworthy that Hilton, prior to the company's reorganisation, proposed ambitious plans for regional casino development on the Central Station site, envisaging the relocation of one of Blackpool's existing better hotels, the Pembroke. Their proposal would not have produced additional stock but simply an improvement in the location of their business which would have benefited from proximity to a new conference centre.
- 5.8.7 Additionally, the Council's approach is seriously flawed because, in the interests of replacing the poor quality conference facilities for which it is primarily responsible, and replacing the "...huge stock of small hotels and guesthouses" it has chosen a route which will ensure the destruction of Coral Island, which according to the Local Plan one of the town's principal tourist "magnets".
- 5.8.8 Blackpool Council has allowed itself to be seduced by the original and now obsolete notion of a cluster of at least four resort casinos. That was the premise of the original 2003 Masterplan from which the Council has been, or more accurately should have been, obliged to progressively resile. Even now, the Council's Development Brief and the pre-application consultation material published by ReBlackpool assume that the town will in short order receive the right to grant a second regional casino licence.
- 5.8.9 Thus the Council's starting point was wrong; its aspirations wholly unrealistic; its proposed implementation flawed; and in consequence, its assessment of the regenerative benefits wholly unreliable.
- 5.8.10 Blackpool has supportive local businesses such as ourselves, who are keen to revitalise the town and for other businesses in the area to make the investment and commitment to Blackpool which we have shown through our investment. Leisure businesses outside of Blackpool, such as Storm City have made proposals to develop a theme park in Blackpool entitled Storm City.<sup>66</sup>
- 5.8.11 Indeed, Council leader Councillor Roy Fisher's own statements support this:

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<sup>66</sup> See Press Articles re: Storm City dated 23 May 2006.

"There's no doubt that Blackpool is still a successful resort."<sup>67</sup>

Responding to questions on the Masterplan, he indicated that "Rest assured, the council is absolutely committed to a major programme of regeneration for Blackpool. With or without casinos we are determined that Blackpool will be transformed once again into a destination of truly national and international calibre."<sup>68</sup>

- 5.8.12 Further, we do not accept that, from an economic perspective, it is right to twin the prospects for the redevelopment of conference facilities with the casino development proposed for the town. Our view is that there would be sufficient demand to redevelop the conference facilities independently of the casino. Conference/Exhibition facilities can be re-energised without the casino development (see RR3 in the Local Plan at page 12), regarding which see above.

## 5.9 Conclusions in relation to regeneration

- 5.9.1 Blackpool is not dependent upon the regeneration prospect of a casino development (as measured in employment and other social deprivation data) and is, in any event, unlikely to benefit in these terms from a new casino.
- 5.9.2 The decline in visitor numbers and the negative image of Blackpool is overstated in Blackpool's Bid Document. The casino is not in fact the sole regeneration project envisaged for Blackpool – there are other high-profile projects and the support of local businesses that are enthusiastic about investing and committing to revitalising the town. The town's prospects of encouraging additional private sector investment will improve once "bid blight" is removed.
- 5.9.3 Blackpool Council's suggestion that the development of the sole regional casino represents the fulfilment of the Blackpool Masterplan is, in our opinion, incorrect not least because the Masterplan, and the regeneration benefits expected to flow from its realisation, depend upon four resort casino developments and cannot be expected to arise from one regional casino alone.
- 5.9.4 The economic benefits of the regional casino in Blackpool Council's bid document are based upon unsafe assumptions and are over-stated. In particular, there are concerns that it will eliminate competition and that the employment

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<sup>67</sup> Masterplan Gazette Supplement dated 13 March 2003, at page 18

<sup>68</sup> Masterplan Gazette Supplement dated 13 March 2003, at page 18.

benefits are over-stated whilst the negative effects, such as problem gambling, are understated because the regeneration benefits of the casino are overstated.

5.9.5 In the circumstances we are very surprised that the CAP gave Blackpool 9 out of 10 for regeneration in the initial sifting process<sup>69</sup> and consider that a much lower score would have been appropriate.

## **6. REGIONAL AND LOCAL CONTEXT, WILLINGNESS TO LICENCE AND PROBABILITY OF IMPLEMENTATION**

6.1 Contrary to the indication given in Blackpool Council's bid document at pages 10-13 we consider that there will be problems with licensing the regional casinos and that there will be significant opposition to implementation of the regional casino proposal in Blackpool. In particular the following issues arise:

6.1.1 The underlying, newly adopted Blackpool Local Plan (the statutory Development Plan for the area for the purposes of the Planning Acts, which provides for the location of the sole regional casino should Blackpool Council's bid be successful) remains in question, as it is subject to a challenge under section 287 of the Town and Country Planning Act 1990 on a number of grounds. The resolution of this challenge (which could be a lengthy process in itself) will, if successful, require a further planning inquiry to be conducted, causing further delay.

6.1.2 It will be apparent from paragraph 5.5.5 above that local support for Blackpool Council's bid was obtained on the basis of the Masterplan i.e based on the concept of a cluster of casinos. Section 5.7 above also describes how the regional casino will eliminate other adult gambling business in Blackpool and that the owners of these other businesses can be expected to oppose the location of a regional casino in Blackpool.

6.1.3 The CAP is a body exercising functions of a public nature and, in accordance with Section 6(3)(b) of the Human Rights Act 1998 ("HRA 98") is a 'public authority' for the purposes of the HRA 98. The CAP, in performing its role and making recommendations under its terms of reference outlined above, must not act in a manner which is incompatible with rights under the European Convention on Human Rights (as set out at Schedule 1 of the HRA 98). In the context of Blackpool Council's bid, we would draw the CAP's attention in particular to Article 1 of the Protocol Number 1, which provides that:

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<sup>69</sup> CAP: Table of moderated scores, op. cit.

"Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law".

6.1.4 Blackpool Council owns the land upon which it proposes to construct the regional casino. In Leaguenotion's submission, this use of the Council's planning and licensing powers would undermine its established, competing, business interest such that it would be unable to compete on equal terms with the product of the use of those powers. It is submitted that it is not in the general interest to drastically affect one or more competing businesses through the grant of a monopolistic casino licence without paying appropriate compensation to those whose interests are damaged.

6.1.5 Furthermore, it is noted that ReBlackpool, the URC in which Blackpool Council has an interest, is seeking planning permission for the development of land and given the apparent conflict of interest special procedures may need to be complied with by the Council as set out in the Town and Country Planning Regulations 1992, such that the decision on the planning application may only be made by the full Council. Further and in any event, we consider that the planning application recently submitted is likely to be called-in by central government for review.

6.2 In summary, we consider that there are substantial obstacles to the implementation of any regional casino proposal in Blackpool and that the benefits of doing so have been overstated<sup>70</sup>. Accordingly we consider that it would have been more appropriate for the CAP to have given Blackpool a significantly lower score than 9 out of 10 for each of willingness to licence and probability of implementation.<sup>71</sup>

## **7. COMMUNITY BENEFITS**

7.1 Blackpool Council states that significant public ownership on and around the casino development will allow further opportunities to maximise regeneration benefits and that Blackpool will obtain the maximum public benefit from the development<sup>72</sup>. However, as detailed above, we consider that the regeneration prospects and economic benefits are

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<sup>70</sup> Blackpool Bid Document, op. cit., pages 15-16

<sup>71</sup> CAP: Table of moderated scores, op. cit.

<sup>72</sup> Blackpool Bid Document, op. cit., page 16

overstated in the Blackpool Bid Document, whilst the negative effects, such as problem gambling, are understated.

- 7.2 In the circumstances we suggest that Blackpool should have scored significantly less than 8 out of 10 in respect of community benefits.<sup>73</sup>

## **8. UNIQUE CHARACTERISTICS**

8.1 Blackpool Council states that, owing to its unique characteristics, Blackpool's case is compelling.<sup>74</sup> However, Blackpool's uniqueness is in fact a fundamental weakness in its application, as detailed in paragraph 4.3 above. Blackpool is not a representative area and it is unique within the UK because of its reliance upon gambling and gaming business and by virtue of its, in our experience, unique visitation patterns and market. Because the existing problem gambling rates have not been properly assessed, it is not possible to judge fully where it stands by comparison with national gambling prevalence rates.

8.2 The unique characteristics of Blackpool are in our view characteristics which make Blackpool unsuitable as a test bed and in view of the primacy of the test bed criterion we are concerned that Blackpool appears to have scored as highly as 7 in the CAP's initial evaluation of regional bid proposals<sup>75</sup>.

## **9. FURTHER OBJECTIONS RE: LOCATION OF SOLE REGIONAL CASINO IN BLACKPOOL**

### Concerns regarding State Aid:

9.1 As you are aware, Article 87(1) of the EC Treaty restricts the granting of aid by a Member State or through State resources in any form whatsoever which distorts or threatens to distort competition by favouring certain undertakings where it affects trade between member states.

9.2 We are concerned by certain indications in Blackpool's Bid Document that the development of the regional casino, if located in Blackpool, will involve illegal State Aid. Such State Aid may arise as follows:

9.2.1 It is undoubted that a casino located in Blackpool, with good transport links to mainland Europe and, importantly, Ireland, would affect trade between member states as a tourist destination.

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<sup>73</sup> CAP: Table of moderated scores, op. cit.

<sup>74</sup> Blackpool Bid Document, op. cit., pages 16-17

<sup>75</sup> CAP: Table of moderated scores, op. cit.

9.2.2 Section 3.1 of the Blackpool Bid Document explains that casino-led regeneration will be funded through £420m public funding.<sup>76</sup> We query whether this funding would constitute aid granted to an undertaking which distorts or threatens competition for gambling tourism within the EU. We would urge the CAP to explore this issue further and, indeed, to request documents evidencing the nature of Blackpool's funding arrangements.

9.2.3 We note that illegal State Aid may take the form of non-pecuniary assistance such as discounts on the purchase of land owned by the State or preferential pricing of state amenities or other services. We note that the Blackpool Bid Document confirms that the land upon which the regional casino would be built is currently in public ownership.<sup>77</sup> We question whether the arrangement for the use of the publicly owned land may be considered illegal State Aid, and would urge the CAP to explore this issue further and request documents evidencing the nature of intended proposals for the disposal of the land (including a consideration of arrangements to ensure that the disposal is market-tested).

## 10. CONCLUSIONS

10.1 Leaguenotion strongly supports and indeed has contributed to regeneration in Blackpool. It has no objection in principal to regional casino development and has indeed evaluated such developments in Blackpool and elsewhere.

10.2 However, Leaguenotion believes that regeneration in Blackpool is not and should not be dependent on a regional casino. Indeed, it is our view that, “bid blight” has deterred or deferred investment in the town. We believe that the unique character of Blackpool means that any regenerative benefit which may result from a regional casino development is likely to be less than it would be elsewhere because of the unique impact the introduction of the regional casino would have on existing businesses (i.e. through the elimination of competition). For the same reasons, Leaguenotion believes that the extent of regeneration benefits would be less in Blackpool than would be the case in other areas.

10.3 Leaguenotion further believes that, due to the fact that,

10.3.1 a high proportion of the regional casino customers will come from outside the Blackpool area;

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<sup>76</sup> Blackpool Bid Document, op. cit., page 8.

<sup>77</sup> Blackpool Bid Document, op. cit., section 5.2 page 13.

10.3.2 Blackpool residents may prove to have a higher than usual propensity to gamble compared to the national average; and

10.3.3 it will be extremely difficult to analyse the likely impact of a regional casino on a major industrial conurbation based on lessons learnt in a largely visitor-orientated seaside resort

Blackpool is not the appropriate test bed that the CAP's Terms of Reference require it to identify and recommend.

10.4 For all the reasons set out in this document and the accompanying expert reports from NERA Economic Consulting and Professor Griffiths we submit that Blackpool ought to score a much lower mark in any final evaluation by the CAP than it did at the initial sifting stage and that it is an inappropriate location for a regional casino.

## **Leaguenotion**

**14 August 2006**

## APPENDIX 1

### LIST OF DOCUMENTS REVIEWED FOR THE PURPOSES OF THIS SUBMISSION

#	Document
<b>A</b>	<b><i>Documents prepared in support of this submission</i></b>
1	"The Case for Locating a Regional Casino in Blackpool: A Critique" by NERA Economic Consulting
2	"Blackpool's Regional Casino: Does Blackpool represent 'the best possible test of social impact' for a regional casino – a critique of psychosocial impact" by Professor Mark Griffiths of the Department of Psychology at Nottingham Trent University
<b>B</b>	<b><i>Documents referred to in the Blackpool Bid Document</i></b>
1	A New Vision for Northwest Coastal Resorts, Locum Destination Consulting for Northwest Development Agency
2	"New Horizons Blackpool Resort Masterplan." – Blackpool Council. 2003 Masterplan - Central Promenade Seafront Project Newsletter (Jun'05) Masterplan - Executive Summary (2003) Masterplan - Gazette Supplement (Mar 03) MasterPlan - Gazette Supplement (Sep 02) Masterplan - Project 1, Central Gateway Information Sheet (2004) Masterplan - Project 2, Southern Gateway information leaflet (2004) Masterplan - Update Brochure (Feb'06)
3	Blackpool Local Plan 2001-2016 Adopted 9 June 2006
4	Draft Heritage Strategy 2006. Blackpool Council, 2006.
5	Hyder Environmental Consultants: Sustainability Appraisal report on Conference/Casino Quarter Local Development document (in progress). (April 2006 version)
6	NWRA Sustainability Appraisal of the North West Refined Spatial Strategy 20 January 2006.

#	Document
7	Gambling Review Report, July 2001.
8	PION report dated June 2005: Casinos in England's North West: an assessment of market demand.
9	Blackpool Town Centre; Business Improvement District Business Plan. Blackpool Town Centre Forum, 2005
10	Alcohol Harm Reduction Strategy. Blackpool Community Safety and Drugs Partnership, 2005.
11	Community Safety and Drugs Strategy, 2005-08. Community Safety Partnership, 2005.
12	Blackpool's Local Area Agreement Submission Document, Blackpool Council, March 2006.
13	Resort Casino Impact Study and Action Plan, PION Economics for Lancashire West Partnership, June 2003.
14	Blackpool Rejuvenated: Proposals to bring prosperity to Blackpool through Resort Casinos. Blackpool Challenge Partnership, 2001.
15	Blackpool Regeneration Framework Towards a World Class Resort. Blackpool Council, 2005.
16	The Strategy for Tourism in England's Northwest NWDA, June 2003.
17	Central Lancashire City Region Development Programme, Lancashire Economic Partnership, May 2005.
18	English Heritage Urban Panel: Review of the Panel's visit to Blackpool with representatives of CABA on 27/28 January 2003.
19	Northwest Regional Economic Strategy 2006-2009. Ministerial Submission December 2005. Northwest Development Agency.
20	Draft Regional Spatial Strategy for the North West. NWRA, 2006.
21	Draft Statement of Policy and Principal under the Gambling Act 2005, Blackpool Council.
<b>C</b>	<b><i>Shortlisted CAP proposals</i></b>
1	Blackpool

#	Document
2	Brent
3	Cardiff
4	Glasgow
5	Greenwich
6	Manchester
7	Newcastle
8	Sheffield
<b>D</b>	<b><i>Other documents</i></b>
1	The social and economic impacts of regional casinos in the UK. Hall Aitken, 2005
2	"Economic and Solid Impact Study of the Proposed Gambling Bill" – A Henley Centre report commissioned by BACTA, February 2004.

## APPENDIX 2

### DETAILS OF OUR FOIA REQUESTS

The information noted in the table below was requested pursuant to S1 of the Freedom of Information Act 2000 and Environmental Inspection Regulations (S1 2004/3391) on 15 June 2006. On 13 July 2006, shortly before the deadline for Blackpool Council's response was due, we received a letter from the Council indicating that they were considering the application of exemptions to disclosure in relation to the material requested. This was repeated in a letter from the Council dated 26 July 2006. In discussions with Blackpool Council, we requested that the documents be provided piecemeal (i.e. those to which access was permitted to be provided first) - this request was declined. We understand the Council is willing to provide some of the documentation requested but we have yet to receive a response to our query dated 2 August as to whether the Council is intending to withhold any information. The outcome is that - almost two months on from the date of our original request - we have yet to obtain the documents which we have requested.

#	Categories of document/s requested
1	All correspondence between Blackpool Council and the Casino Advisory Panel regarding the regional casino under the Gambling Act 2005
2	Documents and information relating to the North West Development Agency's financial support to delivery of the Masterplan and establishment of the Urban Regeneration Company ReBlackpool
3	Documents and information about the social impact assessment conducted with the Primary Care Trust, Neighbourhood Renewal Fund and Local Area Agreement in relation to the proposals for hosting a regional casino
4	Documents and information about the draft Statement of Licensing Policy (including the policy itself and background documents as to the framing of the Policy)
5	Documents and information regarding the new Blackpool Enterprise Centre
6	Minutes and agendas of all meetings (at all committee levels) where any aspect of Blackpool Council's bid for the regional casino under the Gambling Act 2005 has been discussed

#	Categories of document/s requested
7	Documents and information regarding all consultations (including questionnaires and responses) regarding Blackpool Council's proposal to host the regional casino under the Gambling Act 2005
8	Documents and information about any and all public investment initiatives for the casino led regeneration process contemplated by Blackpool Council's bid for a regional casino
9	To the extent not included in the above, all documents referred to in the endnotes to Blackpool Council's submission to the Casino Advisory Panel "Towards a World Class Resort Destination" dated March 2006
10	Documents and information on research conducted regarding the effect of the introduction of a regional casino in Blackpool
11	Information underpinning the statement at page 4 of Blackpool Council's submission to the Casino Advisory Panel "Towards a World Class Resort Destination" dated March 2003 ("casino development will target a wide catchment (90% regional or extra regional) sharply reducing the risk of impulse gambling while any local impacts on our population within it with its typically urban profile would be relatively easily measurable")
12	Minutes and agendas of all meetings between ReBlackpool and amusement arcade operators as referred to at page 11 of Blackpool Council's submission to the Casino Advisory Panel "Towards a World Class Resort Destination" dated March 2006
13	Documents and information regarding all development proposals for the regional casino and any expressions of interest in the development plan and/or operator licence for the regional casino
14	Documents and information regarding the consultation on the Masterplan, Local Plan, BCP "Lets Talk" Campaign and the Scrutiny Committee inquiry regarding opposition to the construction of the regional casino in Blackpool
15	Documents, information and correspondence regarding discussions with private interests on the CCQ site and any co-promotion agreements and relocation proposals
16	Documents, information and correspondence reflecting registration of interest from casino operators and combined operator/developers whether in fully developed scheme form or not
17	Documents, information and correspondence regarding the selection process for

#	<b>Categories of document/s requested</b>
	development partner for the phase development of the casino site and any draft agreements as may exist
18	Documents, information and correspondence regarding infrastructure projects contemplated as part of the regional casino development and any draft or final agreements for such projects
19	All correspondence including minutes of meetings, with interested casino operators, developers and operator/developers.