



CASINO ADVISORY PANEL

EXAMINATION IN PUBLIC

RESPONSES TO QUESTIONS – LONDON BOROUGH OF BRENT

A. TYPE OF AREA

- 1. It is stated that a further critical mass of new leisure and entertainment uses will occur. Can further details be provided and can any statement be made regarding potential dual/multi purpose visits?*

The regeneration of Wembley will create a new local, national and regional destination. The ambition is for it to be one of London's major visitor attractions, in line with regional policy aimed at dispersing tourism more widely across the capital. The Wembley regeneration area extends to some 238 hectares, of which to date around 30 hectares have recent planning consents. These consents include the new National Stadium (which includes a 2,000 seat banqueting venue), the £35m refurbishment of Wembley Arena, 14,000sqm of other entertainment uses (including a large multiplex cinema) and 38,000sqm of new retail uses (including a new designer outlet park and a specialist sports retail cluster, both of which will be destination retail). A new regional casino within or close to the area would significantly complement this offer, not just through the gaming floor but also by way of its entertainment, hotel, food and retail offer. Most importantly, Brent would insist on the provision of a new international conferencing venue within the complex which would further diversify the tourism market to include business tourists. The potential for linked and multi-purpose visits becomes enormous. One can envisage any number of linked trips, and not just between the large venues but also to established 'niche' attractions, for example the Indian restaurants clustered along Wembley's Ealing Road. Consent has also recently been granted for 3 new hotels in the area, which together with the four existing hotels would allow visitors to plan multi venue trips incorporating overnight stays.

Our expectation is that a regional casino will drive further destination type uses within the remainder of the regeneration area, in accordance with the Wembley Vision and the Wembley Development Framework. Our economic impact assessment suggests that the casino complex alone could stimulate an additional 6,145,000 new visitors, which would drive significant further commercial investment.

2. *It is stated the location will remain commercially viable when further facilities may be added elsewhere. This is presented as a unique characteristic. Is that intended?*

As part of the Economic Impact Assessment the viability of a regional casino in Brent was tested in the event of an additional regional casino being located in Greenwich, which is geographically our closest serious contender. It was concluded that in the event of both casinos going ahead there would be little or no impact in terms of projected visitor numbers to either facility. To a large extent, this is the advantage of being in London, with its strong national and international transport connections, and where a majority of regional casino visitors would be day visitors diverted from other venues across the whole city.

3. *PPS6 at paragraph 1.8 refers to casinos as a “main town centre use” and elsewhere (paragraphs 2.24, 2.44, 3.1 etc.) expresses a preference for such uses to be located in town centres. Whilst the remit of the Panel is to advise only on the broad location of casinos, you have chosen in your proposal to identify a more specific location — the Wembley Stadium area — as a particular merit of your proposal. What is your justification for choosing a location away from a town centre?*

Paragraph 1.8 of PPS6 identifies casinos as being a main town centre use to which the policy statement applies.

Paragraph 2.24 advises that, in drawing up policies and proposals, local planning authorities should consider the scale of leisure developments they wish to encourage and their likely impact, including cumulative impact on the character and function of the centre, anti-social behaviour, crime and the amenities of nearby residents, as factors for consideration.

Paragraph 2.44 advises that a sequential approach should be applied in selecting appropriate sites for allocation within the centre where identified need is to be met. The guidance advises that the sequential approach should be considered in the following order:

- First, locations in appropriate existing centres where suitable sites or buildings for conversion are, or are likely to become, available within the development plan document period, taking account of an appropriate scale of development in relation to the role and function of the centre; and then
- Edge of centre of locations, with preference given to sites that are or will be well connected to the centre; and then

- Out of centre sites, with preference given to sites which are or will be well served by a choice of means of transport, and which are close to the centre and have a high likelihood of forming links with the centre.

The area that has been identified for the location of the proposed new casino is the Wembley Comprehensive Development Area (CDA) which is currently the subject of the single largest regeneration project in west London.

The proposal involves the development of the new national stadium which is nearing completion, together with the creation of a new community which will generate in the order of 3,700 new homes as well as create approximately 6,000 new jobs. In addition to this, the development will bring forward a number of “town centre” uses as important and integral components of the area’s function.

In considering the appropriateness of the site as a location for the new casino, the following factors have been taken into account:

- In the context of the existing built fabric of Wembley town centre and taking into account the physical land requirements of a regional casino, there are no sites within the town centre which would physically be able to accommodate such a facility. The approach is therefore consistent with paragraph 2.44 (first bullet point) of PPS6. Notwithstanding the above, even if sites were available, it is considered that the scale of such a single town centre use in Wembley town centre could unbalance the role and function of the town centre and displace more appropriate uses which could more appropriately contribute to the vitality and vibrancy of Wembley. The approach taken therefore accords with paragraph 2.24 of PPS6.
- Having determined that both the physical and functional characteristics of the town centre would not be compatible with a regional casino, it is then necessary to consider the appropriateness of sites identified as “edge of centre” locations with preference being given to sites that are, or will be, well connected to the centre.
- The objective of the CDA is to create a new and vibrant district which is integrated with Wembley as a whole and is included as part of an eastward extension to the town centre. The principle of the CDA being an eastward extension of the existing centre is established in Policy WEM1 of the Replacement Unitary Development Plan adopted on 14 January 2004. In addition, it has also been acknowledged that following the completion of improved pedestrian linkage, via a new pedestrian bridge (“The White Horse Bridge”) to the existing town centre, the CDA is considered to be an “edge of centre location”. As a result, given that there are no suitable town centre sites available, the location of a regional casino within the CDA as an “edge of centre” site, is entirely appropriate and consistent with the sequential approach of PPS6.
- In addition to the appropriateness of this area in sequential terms, there are clear planning benefits for locating a regional casino within the CDA which are fully supported by both strategic and local planning policy.

Strategically the area is identified as an Opportunity Area (Policy 5D.1) in need of regeneration. Within the London Plan Paragraph 5.103 of the

London Plan specifically advises that the area “represents a nationally important opportunity area for leisure related development “.

At the local level, Policy WEM1 promotes:

“The regeneration of the Wembley area as regional sport, entertainment and leisure, including hotel, destination...” (Policy WEM1) (emphasis added).

Supplementary Planning Guidance adopted in September 2003 supports this and sets out the vision for the area:

“Wembley will have a modern service based economy. Hotels, offices, shops, leisure uses and an array of other business will provide thousands of new jobs and meet the needs of both visitors and local residents, 24 hours a day, 7 days a week. Where once there was a redundant and under-used commercial land, there will be a thriving city quarter offering a unique experience...the new Wembley will epitomise the very best of modern urban living” (page 10) (emphasis added).

The proposal for a regional casino at Wembley is therefore consistent with a both strategic and local development plan policy.

In summary then, the area identified as the preferred location for the proposed new casino is the sequentially preferred location. In drawing these conclusions, the availability of sites as well as the implications of the function of the proposal on the town centre have both been considered. The area around the new national stadium is directly associated with the town centre and permission has already been granted for a substantial quantum of main town centre uses. The high quality links that have been established with the town centre and the CDA will allow the town centre to benefit from the casino as a major visitor attraction for Wembley in the same way the town will benefit from the stadium.

The location is also to be sequentially preferred given its position and catchment in West London and exceptionally high levels of public transport accessibility. This preference is recognised by the Mayor in implementing the London Plan. The Wembley Regeneration Area / CDA is highly accessible by public transport, being served by a range of underground and mainline railways and a well developed bus network, creating good accessibility with a wider regional and national transport network. Thus full advantage can be taken of its accessibility by public transport.

The overall regeneration of Wembley, of which the casino related proposals form an important part, will make an important contribution to physical regeneration and net additional employment opportunities, stimulating economic growth, increasing investment in the area and promoting social inclusion.

- 4. You already quote the London Plan (at your paragraph 7.5) and the Brent UDP (at your paragraph 7.7) and the draft West London Sub-Regional Framework. Please let us have a copy of the last-mentioned and tell us of its current status. In the light of these documents, how do you see the functional relationship between the town centre of Wembley and the Stadium area?*

The West London Sub-Regional Framework is now published in its final agreed form and is attached. The Framework is not a Supplementary Planning Document, however it is derived from the London Plan policies, and is seen as a material consideration for stakeholders, including the borough's that comprise the west London sub-region. Paragraph 8, page 4, sets out the status of the Framework.

Further draft alterations to the London Plan have been passed to the London Boroughs for prior-to-formal consultation later this year. The draft alterations include a new policy on casinos with Greenwich and Wembley identified as appropriate locations in view of their strategic regeneration and leisure roles. The London Plan recognises Wembley as a nationally important Opportunity Area for leisure related development, and acknowledges the need to upgrade the three stations that serve the area as well as improving links between them and the strategic leisure facilities.

Brent's UDP identifies the stadium area and the majority of the existing town centre as the 'National Stadium Policy Area' where large scale leisure, entertainment, retail and leisure uses will be directed, subject to the sequential approach (Policy WEM3).

Both plans acknowledge the importance of regenerating Wembley as a town centre and the UDP acknowledges the eastern expansion of the existing town centre towards the stadium area. The completion of the new White Horse Bridge link, together with the consented Quintain scheme, has now established the infrastructure for this expansion. The net result is likely to be the creation of a significant linear centre with local speciality and value shopping to the west, extending eastwards towards major destination shopping and leisure with a more regional and national appeal.

B. SOCIAL IMPACT

5. *The deprived communities of Harlesden, Stonebridge, Church End and St Raphael's lie immediately south of Wembley. The gambling vulnerability index highlights proximity as an issue. Can further comment be given in respect of this?*

A copy of EDAW's social impact assessment is attached. This makes extensive use of Experion's Mosaic datasets to try and profile potential patterns for gambling and problem gambling (pages 22 to 26). This draws a number of conclusions:

- At least 47% of Brent's population are potential casino users, over 4 times the national average (12%);
- The proportion of potential vulnerable gamblers is 14%, in line with the average for Greater London as a whole;
- The risks within Brent are most acute in the south east of the Borough, in particular around Willesden, Kilburn, Brondesbury and Kensal Green.

- The area immediately surrounding Wembley is low risk, although there is a pocket of high risk around Stonebridge.

These figures reflect the population density in London – effectively, a higher density population leads to more potential casino operators living in close proximity, which in turn is likely to lead to more problem gamblers in close proximity. The key issue here is awareness. The more concentrated the potential casino visitors and problem gamblers, the better support services will be able to respond by providing prevention and treatment services. This will be much more complex in an area where visitors come from a more dispersed location, with the associated risk that problem gamblers remain hidden.

In relation to the gambling vulnerability index, this sets out typical profiles of those people who are more susceptible to problem gambling. A regional casino is just one component of this – regardless of whether a regional casino is located in Brent, these communities will still be vulnerable to other forms of gambling, such as internet gambling or scratch cards. It is accepted that location close to a casino could increase vulnerability but again, awareness of the situation is the key to addressing the issue. The EDAW report researches and identifies best practice from around the world in relation to preventing, identifying and treating problem gambling, and we would be insisting on a comprehensive package of best practice measures, funded by the operator, should Brent be successful.

The flip side to the issue of vulnerability is that the communities of Harlseden, Stonebridge, Church End and St Raphaels are the very communities which the regeneration of Wembley is aimed at benefiting. Proximity to the new regional casino will be a clear benefit in terms of accessing employment opportunities, and we are confident that we will be able to make the connections between these communities and the jobs on offer at any new facility. (see question 8).

6. *It is stated that local anxieties exist about proposals for a regional casino. Can further details be given and can an update be provided in respect of the outcome of consultation events such as the Great Casino Debate, the Multi Faith Forum, area Consultation Forums and the Citizens Panel?*

Four specific areas of public consultation have been undertaken:

- a full questionnaire survey distributed to every household in the Borough;
- an identical questionnaire survey sent directly to members of the citizen's panel;
- the Great Casino Debate;
- polling undertaken and published by Quintain and Harrahs

The results of the full questionnaire survey, distributed to every household inside the Council's magazine, are not yet available, as the closing date for

receipt of responses was 10th August 2006. A full report is currently being produced, and will be forwarded to the Panel by 23rd August 2006.

The same questionnaire survey was distributed directly to 880 members of the new Brent Citizen's Panel. A total of 224 responses were received, representing a 22.5% response rate. A majority of the responses were from people over 35 (89%). The 'top line' responses have been collated, and can be summarized as follows:

- 26% of those responding consider casino gambling unacceptable for anyone, and a further 39% consider it acceptable for others but not for themselves;
- 55% of responses were strongly opposed or opposed to a casino development within the Wembley regeneration area;
- Issues of most concern related to increases in crime (68%), traffic congestion (65%), problem gambling (64%) and parking (50%).
- The key benefits identified are employment / new jobs (69%), tourism (43%), regeneration (30%) and increased investment (27%).

On Tuesday 25th July 2006 the Council hosted the 'Great Casino Debate' – an open forum held at the Town Hall for local residents to discuss the issues and concerns associated with a new regional casino. Nearly 200 people attended the event, and heard presentations from Anthony Jennett (Chairman of Gamcare), Patrick Gulliver (EDAW – who undertook the social impact assessment) and Edward Bramley-Harker (NERA – who undertook the economic impact assessment). There was also an opportunity for individuals to ask questions from the floor to an expert panel, which included senior representatives from Brent Teaching Primary Care Trust, Brent Police and Harrahs Entertainment. A majority of the questions raised concerns about a possible casino, particularly in relation to traffic, car parking, local disturbance and crime.

As part of the event local residents were invited to participate in more structured 'table discussions', which posed three questions:

- What do you see as the benefits of a new regional casino in Brent;
- What concerns do you have about a new regional casino being located in Brent; and
- Are there any measures that could be put in place to overcome any of these concerns?

In relation to the potential benefits, the most commonly recognised were job opportunities for local people, inward investment, more leisure and entertainment opportunities, increased revenue into the Borough, the opportunity to negotiate section 106 resources and tourism. The disbenefits identified included traffic, parking, anti-social behaviour (drinking, gambling, sex industry, crime, drugs), disproportional impact on vulnerable people, hidden costs of policing, out of character with the surrounding residential area. The disbenefits largely fell into two categories – those relating to the impact a casino would have on people living in the immediate vicinity, and those relating to effects of problem gambling. In terms of measures that could be put in place to overcome these concerns, a range of ideas were

suggested, including no casino, direct access road and car parking for the casino, extra security and policing, a proportion of the casino profits to be directed into a 'regeneration fund', ensure Brent resident's access jobs and more resources for health services.

The final piece of consultation was not undertaken by the Council, but by Quintain and Harrahs Entertainment, who commissioned Communicate Research to undertake a random telephone survey of 1000 Brent residents between 10 and 14 May 2006. The survey's findings were:

- One in five respondents are entirely resistant to casino gambling of any sort;
- Overall there is a 50-50 split between those residents who support a casino and those who don't. Amongst those who are aware of the specific casino proposals, the figure in support rises to 54%.
- There are significant differences in support according to age. 71% of 18-24 years support the proposals, but generally the older the respondent the less likely they are to support the plans.
- The most common reason for opposing a casino is that it would encourage gambling amongst vulnerable groups, followed by crime and increased traffic.
- 29% of residents are more likely to support the proposals when presented with the wider social and economic implications, and 22% are more likely to support if strict safeguards are put in place to address problem gambling.
- The most common benefits cited were employment, tourism, helping to establish Wembley as a leading entertainment destination, good for local businesses and improved leisure facilities.

7. *Can you summarise the lessons you have drawn from your experience of casinos so far and what methods did you use to derive these? What empirically based assessment, if any, is available on the impact of existing gambling operations within your area on problem gambling and may we have a copy of any reports?*

Brent has no direct experience of casinos – none exist within the Borough at present. Our position is informed by a Social Impact Assessment undertaken on behalf of the Council by EDAW. The brief for this work was to identify the potential social impacts of a new regional casino located within the Borough, including the impact on problem gambling, and to research best practice into mitigating these impacts. A copy of the final report is attached.

8. *Why is it that you are so confident that the new casino will benefit the mass of economically inactive people in your council's area – in particular, in the deprived areas how will you ensure a positive take up of job opportunities?*

The Council's regeneration strategy is underpinned by employment. Within the context of a broadly healthy London economy, we view it as essential that local people – and particularly those who the system fails to reach – are clear beneficiaries of new employment opportunities. As a Borough Brent has areas of extreme deprivation - most noticeably in Harlesden, Stonebridge, Kilburn, Church End and St Raphaels – and we see employment as the only realistic driver for improving this situation.

As a Borough we have invested heavily in employment initiatives. We have established Brent in2work to provide leadership and direction to employment support across the Borough. Brent in2work co-ordinates a partnership of some 35 local employment organisations, which includes all of the relevant mainstream organisations (Job Centre Plus, Learning & Skills Council) as well as voluntary, community and private sector job brokerage and skills providers. The aim of Brent in2work is to ensure that both companies and individuals get access to the right service through the right organisation at the right time. By way of example, Brent in2work have recently been working with the National Stadium's appointed catering contractor, Delaware North. Bespoke training has been developed and an interview guarantee scheme agreed for all people completing the bespoke training. To date 75 local people have been offered jobs, out of 112 local people who have completed the training and who were interviewed. We have well developed section 106 clauses designed to facilitate this process, and it will be a pre-requisite that a key selection criteria for any regional casino potential license holder will be a strong commitment to actively participate in, sponsor and support local employment initiatives.

In order to ensure local people from Brent's most deprived neighbourhoods benefit, Brent in2work runs a dedicated outreach project, known as Households Into Employment. This project has a rolling programme of knocking on doors, attending local gatherings (eg. at the local schools) and working with other service providers (eg. social services and housing) in an effort to identify all people in these areas who are eligible to work and who want to work. We then refer these people onto the correct provision to help them achieve employment.

Brent in2work is now well established and has had considerable success. Last year it directly placed 890 people into work, with a target of 1400 for 2006/07. Last year 80% of job placements were ethnic minorities and some 40% came from the priority neighbourhoods.

Our success has been externally recognised. Brent is a Beacon Council under both the 'Removing Barriers To Work' and the 'Promoting Neighbourhood Renewal' themes.

9. *Please give us precise details on how you came to your economic impact assessment*

The economic impact assessment was produced by NERA Economic Consulting – a global firm of economists. The methodology relied on both the published literature and interviews with key stakeholders (including Caesars / Harrahs as one potential occupier) to identify the costs, benefits and transfers associated with a regional casino facility. The research ‘cross-checked’ and verified estimates for visitors and employment that were provided by Harrahs and subsequently used a series of employment multipliers to measure leakage, displacement and indirect/induced employment. A key part of the research was to test the impact against other likely development scenarios within the Wembley regeneration area – the economic impacts of a regional casino compared favourably to both alternatives that were examined.

A full copy of the research findings are enclosed for the Panel's information.

C. NEED FOR REGENERATION

10. *How essential is the casino to secure the overall regeneration project (which is massive) when to the Panel's knowledge it never was a "pre-requisite" before?*

The overall regeneration project is Wembley extends over an area covering some 238 hectares surrounding the new national stadium. Two large planning consents in the area immediately surrounding the Stadium have already been granted, which include the £35m refurbishment of Wembley Arena, 14,000sqm of other entertainment uses (including a large multiplex cinema), 38,000sqm of new retail uses, a new hotel, 63,000sqm of new offices, 8,500sqm of community floorspace, 4,000 new homes and a series of stunning new public spaces. These permissions are at the early stage of build out, which is expected to last up to 10 years. The immediate effect of a new regional casino will be to rapidly accelerate the regeneration programme, as investor and end-user confidence in the area increases. With a regional casino Wembley's contribution to the London economy will more than double, taking anticipated visitor expenditure to £470m. More of this expenditure will be retained in the local economy.

However, in the medium term there is still a significant amount (some 200 hectares) of underused and brownfield land within the regeneration area. A new regional casino with associated international conference facilities will increase and diversify the visitor profile. Wembley will become recognised as a new London destination in its own right, and there will be the scope for further mixed use and destination focussed development in the area. No other leisure development would generate the values and synergies that would make an international conference centre commercially viable. If there is no regional casino at Wembley, then there will be no international conference venue at Wembley.

11. *If you were not successful in gaining the recommendation for the one regional casino license – what would happen to your regeneration plans?*

The Council's regeneration plans are driven by 'Our Vision for Wembley', and come what may we will continue to pursue the delivery of these ambitions. The regional casino would be a critical driver of some of the less commercially viable components of this vision, and thus there are a number of impacts should Brent not receive the one regional casino license:-

- Undoubtedly the pace of regeneration in the area will slacken, although it is likely that the consents outlined above would still be implemented;
- It is unlikely that the ambition for an international conferencing venue would be realised – without the commercial benefits of being co-located with a regional casino such a facility will not be viable without significant levels of public subsidy.
- Land values are such that much of the regeneration area is likely to come under increasing pressure for residential development, which clearly would not offer the same economic benefits to local people of businesses. (See Economic Impact Assessment).

D. WILLINGNESS TO LICENCE

12. *In view of the recent local election result, how can the Panel be sure that the Council remains willing to licence a casino at Wembley?*

Since the submission of Brent's statement of case political control of the Council has changed from a Labour majority administration to a Liberal Democrat – Conservative joint administration. At the time of responding the Council's policy remains as at the time of the submission. However the new administration will be considering the Council's position at its Executive meeting on 23rd August 2006 in the light of the responses to the recent public consultation exercises outlined in the answer to question 6 above.

E. PROBABILITY OF IMPLEMENTATION

No questions

F. REGIONAL CONTEXT

13. *We would like to understand Brent's current profile and capabilities in international tourism, as well as the strategies being pursued to develop this and hence how a Regional Casino fits within these existing strategies. Could further evidential details be provided in respect of the statement that most of the 1.6m new overnight visitors will be foreign tourists?*

As a Borough, Brent has traditionally invested little energy in tourism as a separate discipline. This is largely a consequence of us having very few tourist attractions, and with the exception of the Stadium (which itself has been closed for five years) certainly nothing of international significance. The regeneration of Wembley clearly has the potential to significantly change this position. In recognition of this, over the last year the Council has commissioned work by Jacky Brookes Associates (tourism consultants) to help us understand how we best need to position ourselves to respond to this agenda, both in terms of marketing and visitor management. We have been an active partner in establishing the West London Tourism Strategy and Action Plan, and have built improved relationships with Visit London. We are particularly keen to identify areas where public sector intervention can really 'make a difference' and complement the existing and future private sector investments.

Brent's visitor estimates are drawn from the Economic Impact Assessment undertaken by NERA (pages 8-12), and are estimated from night visitors provided by (the then) Office of the Deputy Prime Minister. Within casinos it is the number of gaming tables that is the most important indicator of the likely number of night visitors. NERA's estimates considered two scenarios – the regional casino as the equivalent of 5 existing London casinos and the regional casino as the equivalent of 10 existing London casinos. In the latter example 1.182m foreign night visitors would be generated, although it is accepted that this is the high end of the scale and that the '5 casino' comparator shows 539,000 foreign night visitors out of a total of just over 1 million per annum.

14. You didn't wish to consider a large or small casino fallback – what is it about the regional casino that will make such a difference to your area?

It is not the provision of a casino per se that interests the Council, but rather the regeneration benefits that accrue from such a facility. The Council's regeneration ambition is driven by 'Our Vision for Wembley'. A regional casino could clearly deliver some key outstanding components of this, most significantly:

- A national, regional and local leisure destination – both by virtue of itself as a stand alone facility in its own right, but also as an attractor for further leisure and entertainment investment;
- The London convention centre – a regional casino has the ability to deliver international conferencing and convention facilities for up to 5000 people;
- A centre for work – a regional casino complex would directly create some 2000 jobs from day 1, resulting in a net increase of 1501 jobs across London.

The scale of large and small casinos is such that they wouldn't be able to make any significant contribution to the Council's regeneration agenda other than what they could provide in their own right.

G. COMMUNITY BENEFITS

- 15. Childcare is identified as a barrier to employment issue linked to operating hours. How will this be addressed?*

Childcare is likely to be one of a number of barriers faced by residents who may otherwise want to take advantage of the employment opportunities available at a regional casino complex. In order to provide local people with the best possible opportunity of accessing job vacancies we will insist that a 'local employment and training' plan is jointly prepared between ourselves and the casino developers and operators, for both the construction and the end user phase. This will provide clarity on the commitments expected from all parties to ensure local people can access the opportunities on offer. It will also require payment of a sum of money, over a long time period, to help people overcome barriers that they may face, including childcare. By way of example, the recent Quintain planning consent at Wembley provides for a sum of £2.5m over a 10 year period to support such efforts.

- 16. How much thought have you given to possible "commercial" deals with any possible operator? Are you confident you will be able to obtain the best community benefit from the project? What would money obtained from such deals be spent on?*

Brent is well placed to secure the best possible "commercial" deal from any future operator. We have good experience of negotiating section 106 agreements on major, high profile developments – most recently a package in excess of £21m negotiated with Quintain estates, a deal which was negotiated in less than 3 months from start to finish. Section 8.4 of our original submission makes clear the key components that we would require through any agreement.

In terms of ongoing commercial arrangements, we would envisage pursuing a model similar to that secured with the new National Stadium in Wembley, whereby 1% of annual turnover is placed into a Trust for the benefit of local people. In this scenario it would then be the Trust's role to identify specifically how this money would be spent, but it is envisaged that its terms of reference would include the ability to fund measures to prevent and treat problem gambling, measures to prevent and respond to associated social and health issues, education and employment related activities.

Should we be successful in securing the regional casino license we are fully committed to holding an open and transparent competition amongst potential operators and developers. This will ensure that we maximise our negotiation position and achieve the best possible commercial deal for Brent.

17. In paragraph 3.5 of your proposal, you claim the number of jobs to be created as:

<i>Casino (gaming)</i>	<i>760</i>
<i>Food/catering</i>	<i>557</i>
<i>Security</i>	<i><u>484</u></i>
<i><u>Total</u></i>	<i>1801</i>

These figures are substantially larger than the job creation claimed in other proposals (see the CAP website). What is the researched evidence for these figures?

The figures used reflect the findings of NERA's Economic Impact Assessment. This used as its starting point the indicative proposals developed by Quintain and Harrahs. The figures provided by Harrahs were then verified by NERA using established ratios linking land use with employment. The NERA report then goes on to apply a number of employment multipliers to take account of leakage, displacement and indirect/induced employment to derive the figures presented in Brent's submission. A copy of the full NERA report is attached.

The figures used reflect the scale of any new regional casino, which would be significantly greater in size than the examples quoted from Birmingham and Dortmund. More accurate comparisons can be made with some of the regional and resort casinos in the USA. By way of examples, the Rincon Casino in San Diego employs 1,637 people with a comparable size gaming area to that allowable under the UK legislation, but without such a significant conferencing offer as we would be seeking at Wembley. Some of the larger facilities, which include large international style conferencing, will employ more – for example, Ballys AC in Atlantic City employs 4,867 full time equivalents, although in this instance the gaming area is considerably larger than that envisaged within the UK.