

**CASINO ADVISORY PANEL
Formal Proposal Cover Sheet**

Please fill in all categories below:

Name of Local Authority:

Luton Borough Council

Main Contact:

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Name and title of Submitting Officer:

Name: **Colin Chick Esq.**

Title: **Corporate Director, Environment and Regeneration**

Statement of basis of application:

What exactly are you proposing? Please make clear which type of casino you **primarily** wish to be considered for.

Regional Yes/No

Large (state number) **1**

Small (state number)

If this proposal is unsuccessful what if any is your fall back/ second proposal?

Large (state number)

Small (state number). **1**

Type of area

Size and Population

The Unitary Authority of Luton covers 4,338 hectares and is a major regional retail and employment centre sitting on the edge of the Chilterns – an Area of Outstanding Natural Beauty – 30 miles north of London.

Home to over 100 different nationalities, Luton is an ethnically diverse town with a population of 184,371¹ and is the largest and most densely populated conurbation in the East of England Region. With its favourable location and unparalleled levels of connectivity (M1, proximity to the M25, London Luton Airport and Midland Mainline/Thameslink), Luton can boast a catchment of 27 million people within 2 hours travel.

Although still perceived by some as three separate towns, Luton, Dunstable and Houghton Regis have coalesced into a single conurbation and, excluding London, is the largest in the South East. Administratively, they are split with Luton as a unitary authority, and Dunstable and Houghton Regis falling into South Bedfordshire District.

Luton has a higher than average number of residents in the most economically active age groups of 20 to 24 (8% compared to East of England average 5.5%) and 25 to 29 (7.4% compared to East of England average 6.3%).

Employment

In 2001, 47.94% (88,396) of Luton's residents were economically active and of these 42.5% (55,994) were in full time employment, 10.4% (13,635) were in part time employment² and 6.7% (8,804) were self employed³. Luton now has a business community that is far removed from its hat making days. Major employers that have located in Luton and its high-tech business parks include: Selex (Bae Systems); Easyjet; AstraZeneca; Ernst & Young; Interbrew; General Motors and Alteon.

The current unemployment rate in Luton is 3.5%⁴ (4,019) and is consistently above the East of England average (2.0%) and the national average (2.7%)⁵. There are also significant disparities between wards in Luton, with unemployment in Biscot (4.9%), Dallow (5.7%), Northwell (4.9%) and South (5%) all significantly higher than the Luton average.

The proportion of Luton's employees working within manufacturing has continued to decline from 19.6% in 2001 to 12.6% in 2004⁶. Whilst there has been growth in hotel and restaurant employment during this period, it still remains below regional and national averages. Luton's largest socio-economic grouping is in the 'lower managerial and professional occupations' (16.2%), followed by 'semi routine occupations' (13.3%). In 2003, 66% of new businesses in Luton had survived for 3+ years⁷.

Ethnicity

Luton has a diverse population base with over a quarter of the population from an ethnic minority. The largest ethnic groups, other than British, are Pakistani (9.2%), Irish (4.7%), Caribbean (4.2%), Bangladeshi (4.1%) and Indian (4.1%). Since the 2001 Census, Luton has experienced significant inward migration of Eastern Europeans, most notably Poles, Ukrainians and Albanians. If this is sustained, it will have a major impact on the demographics of the Borough.

In 2003, 66% of new businesses had survived for more than three years

1: 2001 Census, [Key statistics for Local Authorities] © Crown Copyright

2: Full time is defined as working 31 or more hours a week. Part time is defined as working 30 hours or less a week.

3: 2001 Census, [Key statistics for Local Authorities] © Crown Copyright.

4: "Unemployment Bulletin – February 2006", Research and Intelligence Team at Luton Borough Council.

5: Office for National Statistics (via NOMIS) from Research and Intelligence Team at Luton Borough Council.

6: Annual Business Inquiry 2001, 2003 and 2004

7: "Luton Regeneration Strategy – October 2004", Environment and Regeneration Department, Luton Borough Council.

Luton Ethnicity
2001 Census ©
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In 2002 14.8% of staying visitors were from overseas – accounting for 39.7% of total visitor spend.

Education

Luton has 12 high schools, a beacon-rated Luton Six Form College and beacon-rated Barnfield College, as well as Luton University, which has an excellent reputation for business, media studies, computing, health and social care – attracting many overseas students. The University has twice finished top in the national tables for the percentage of graduates gaining employment. Luton Borough Council (LBC) are working closely with Luton University to ensure there is a greater retention rate of students in the Borough post graduation.

18.8 % of Luton’s population is educated to NVQ Level 1 and 19.6% to NVQ Level 2 – both above the levels for England and Wales.

Tourism

Luton had a total of 412,000 staying visitors in 2002 that spent in excess of £68,000,000. 14.8% were from overseas and these accounted for 39.7% of the total visitor spend⁸. Over 2 million day visitors⁹ contributed a further £64,030,000 to the local economy. Direct visitor spend and other expenditure associated with tourism accounted for a total of £149,182,000.

The purpose of most trips to Luton by UK staying visitors was to visit friends and relatives (42%), holiday (40%) and business (17%). For overseas visitors the main purpose of their trips was visiting friends and relatives (40%) and a high proportion were for business, (31%). A large proportion of overnight visitors to Luton ‘on holiday’ can be directly attributed to airport related passengers.

Luton’s one, two and three star hotels (1,700 bedspaces), motels and inns catered for 31% of UK guests and 38% of overseas guests. It is estimated that 2,657 full time equivalent jobs and 3,573 actual jobs were supported by tourism spend in Luton in 2002.

Luton is faced with a number of obstacles in its drive to improve tourism levels and to broaden the employment base away from an historic dependence on manufacturing. Paramount among these is people’s negative perception of Luton as a quasi-modern industrial town with little heritage. This image is also exacerbated by the unwelcoming first impressions of the town due to its poor urban landscape. Paradoxically, Luton’s biggest tourist asset, London Luton Airport, contributes significantly to its image as a place to ‘pass through’ rather than to stay – a perception the Council are keen to correct.

Another constraint facing Luton’s tourist offering is the limited physical size of the Borough and the prohibitive nature of the tight Green Belt boundary around the town. This translates into a limited amount and type of sites available for tourism and leisure use and much of Luton’s tourism strategy’s success will depend on gauging the right leisure mix against other employment uses and housing requirements.

⁸: “Economic Impact of Tourism, Luton 2002”, East of England Tourist Board (EETA).

⁹: Figures generated for day visits rely on the 1998 United Kingdom Day Visits Survey – (EETA note they may not be as accurate as those for staying visits. Day visits are counted as lasting more than three hours.

Luton's main tourist and leisure offering includes:

- Luton International Carnival – the second largest in the country, after Notting Hill.
- Stockwood Park Museum and Gardens
- Luton Museum and Art Gallery
- The Hat Factory
- Luton Town football club
- The Mossman Collection
- London Luton Airport
- The Galaxy Complex – a multi-screen cinema and family leisure complex
- The Mall Arndale Shopping Centre
- Historic sites including Wauluds Bank and St Mary's Church

For too long Luton's tourist and leisure assets have not reflected its size, regional importance and employment status. However, LBC clearly recognises the importance of tourism to the wider Luton economy and to this extent welcomes initiatives that will:

- Improve the public and residents' perceptions of Luton
- Ensure that overnight visitors stay for longer and that Luton is not perceived solely as a place to pass through
- Improve and enhance the standard of accommodation services in Luton (currently there is only one 4* and no 5* hotels and inadequate capacity)
- Increase the level and standard of conference facilities available in Luton – to meet the increasing demand of business traveller and the 30,000 private jet movements through Luton Airport annually
- Identify and support new opportunities and markets for the benefit of the tourism industry and the wider Luton economy – including the 2012 Olympics and the increase in airport passenger numbers
- Improve the quality of leisure offerings in Luton and improve marketing of existing tourist attractions – to embrace a wider European market and capture visitors

London Luton Airport currently operates at over 10 million passengers a year.

London Luton Airport (LLA) will be crucial to ensuring the long-term growth of tourism in Luton. Currently, LLA operates at over 10 million passengers per annum, representing a doubling over the last 7 years, and flies to over 100 destinations. In 2003 the Government announced its support for extensions to the airport that would enable LLA to operate at 31 million passengers per annum by 2030. This will provide a market for a wealth of associated tourist opportunities in Luton and the surrounding areas. The challenge will be to provide a new tourist asset that captures this market, ensuring business and leisure traveller remain in Luton for longer – helping to generate new jobs and new opportunities, enhance the town's image and contribute to the wider economy.

Regeneration Needs

Luton is successfully emerging from a period of major economic restructuring following the reduction in the levels of manufacturing, particularly in the automotive industry. The Milton Keynes and South Midlands Sub-Regional Strategy recognises the need in Luton for, "...concentrated efforts to support the continued regeneration of the economy, to achieve urban renaissance and regeneration, to transform the image and townscape of the urban area, to relieve the severe levels of congestion, and to improve the quality of development."¹⁰ To this end, Luton is recognised as a Priority Area for Economic Regeneration and in 2000 was also awarded Assisted Area status by the Government.

10: "Milton Keynes and South Midlands Sub-Regional Strategy – March 2005", page 23, Government Offices for the South East, East Midlands, East of England.

The former Vauxhall Motors site will test a Large Casino's regenerative capability

LBC recognises the need to grasp every development opportunity that presents itself in order to capitalise on its unique location and communication advantages. LBC's regeneration priorities include:

- Deliver initiatives that help with the economic restructuring of the town and improve access to jobs and training
- Improve the inward investment environment and level of service – focusing on bringing derelict brownfield sites back into employment use through strategic transport planning
- Help ensure the skills base of local residents more closely matches the key growth areas of Luton, including the leisure, tourism and airport related industries
- Close the deprivation gap for struggling parts of Luton – assisting 3 areas of the Borough out of the 10 % most deprived in the UK
- Through local partnerships, “improve the quality of life of all its residents, increase their social and economic prospects for the future, and enable them to participate fully in the life of the town”¹¹

Testing Social Impact

Luton is well placed to test the social impact of a Large Casino – without it becoming a costly and unpredictable social experiment.

Luton already has two town centre casinos, and a third to the West of the town centre, providing a mainstream leisure activity for the local community. A Large Casino in Luton, whilst on a different scale to existing casinos, will not be a new gambling phenomenon and would not result in it becoming a dangerous ‘social experiment’ in the heart of a community that has no prior experience of a casino.

The Borough of Luton has a population size and a tight geographical boundary that will greatly facilitate the measuring and monitoring of any social impact. Furthermore, Luton's Unitary Authority status and excellent network of community partners will enable a true picture to be painted of the social impact a large casino will have on the town.

Luton has no other tourist attraction that would compete (in terms of footfall, tourist spend and catchment) with a new Large Casino. Luton would provide the perfect testing ground for its direct impact on levels of tourism – unlike a much larger city or seaside resort where tourism levels can not be easily attributed to a specific leisure offering or visitor attraction.

Given the proximity to London Luton Airport (and the airport's forecasted growth) and its unparalleled transport connectivity, Luton is ideally placed to test the catchment area of a Large Casino, in both a national and European context, and the impact it has on levels of domestic and overseas visitor spend.

LBC have identified a mixed-use scheme on the former Vauxhall Motors site on Kimpton Road on the edge of the town centre as a potential site for a new Large Casino, (see page 11), helping to test a Large Casino's true regenerative capability in acting as a catalyst for the redevelopment of this strategic brownfield site.

11: "Luton's Community Plan 2002-2012", page 3, Luton Forum, 2005 Revision.

Social Impact

Research

LBC's research into the social impact of casinos on local communities has revealed that there is no consensus on the extent of the regenerative benefits or the negative social effects of a Large Casino. Studies have been conducted on the impact of a Regional Casino but LBC are reluctant to draw on these as the leisure offering and scale are so different that making comparisons becomes impossible.

LBC have tried to adopt a measured and realistic approach when answering a number of questions (below) in our attempt to ascertain its impact on the community as a whole. It has also tried to quantify its impact on social cohesion and the sustainability of the community.

Will a large casino in Luton lead to an increase in the levels of gambling addiction in the Borough?

The current estimate is that 0.6% of the adult population are problem gamblers¹². It is reasonable to conclude that greater availability of gambling opportunities in general (and the relaxation of advertising codes), would lead to an increase in the number of people who develop a problem with their gambling. The difficulty arises in trying to rationalise the extent to which this could be directly attributed to a new Large Casino and not the prevalence of other forms of Gambling – such as the internet.

A Large Casino in Luton would not offer any new form of gambling that is not already available on Luton's high street. LBC are also aware that Category A gaming machines, which arguably pose the greatest threat to people who might develop problems with their gambling, will not be available in a Large Casino.

LBC would explore the following methods to mitigate an increase in problem gambling:

- In addition to the Gambling Commission's codes of practice for Operators¹³, LBC would consider attaching further licensing conditions, including:
 - Agreeing advertising exclusion zones in the Borough – for example around schools and other areas to protect the young and vulnerable
 - Agreeing with the provision of an annual budget specifically for the Council to advertise the services of GamCare, GamAnon and other predetermined and appropriate help lines or internet sites
 - Explore with the Operator ways to help fund a specific local prevalence study before the casino begins operating in order to provide a benchmark and again every three years
 - Ensure the operator adheres to a strict training programme to help employees recognise and appreciate the symptoms of problem gambling and how best to direct people towards the help that is available
- Ensure that ambient gambling is kept to a minimum
- Ensure the operator appoints a senior member of staff to act as a liaison between the Council and relevant predetermined community, voluntary and religious groups in order to ascertain the social impact the casino was having and to provide a more formal forum in which to discuss the best ways to mitigate any negative impacts
- The presumption of the Gambling Commission is that the current practice of supplying delineated plans of premises to licensing authorities will continue. In effect, Luton Borough Council will be able to indicate whether they believe sufficient distinction has been made between gaming and non gaming areas, and similarly that adequate provision has been made to prevent children from entering the adult gaming area
- Initiate harm reduction policies. These will include policies that educate and enlighten local residents as to the odds and inherent risks associated with different forms of gambling. Publish healthy gambling guidelines for the general public (similar to low risk drinking guidelines) and adopt creative approaches to the

A Large Casino in Luton would not offer any new form of gambling that is not already available.

12: "Gambling Behavior in Britain: Results from the British Gambling Prevalence Study", National Centre for Social Research, June 2000.
13: As set out in "Licensing Conditions and Codes of Practice, Casinos", Gambling Commission, March 2006.

early identification of gambling associated problems, incorporating the concept of moderation and abstinence goals for problem gamblers offered in a non judgemental way

- LBC would wish to monitor the demand for money and debt advice closely and, if necessary, would seek contributions from the Operator to part fund the provision of more Money Advisors at Luton's Citizens Advice Bureau (CAB)

What impact will a Large Casino have on the quality of life of individuals, families and communities in the Borough?

LBC have used the following quality of life indicators, as referred to in Luton's Community Plan 2002 – 2012 (2005 Revision), in order to gauge the impact of a Large Casino: employment and income; access to health services; education, skills and training; housing and services; crime.

LBC believe that a Large Casino will kick start the regeneration process and help maximise levels of employment

Employment and income

LBC would seek to ensure the Operator provided a locally run croupier training programme in order to match sufficiently the local skills base with the employment needs of a new Large Casino. Operators have indicated that a Large Casino, in conjunction with related hotel, restaurants and bars, will provide up to 600 full time equivalent jobs with a higher average wage than other sectors in Luton. Operators have indicated that the starting salary for a Croupier is approximately £17,000 per annum.

Currently there are 4,019 unemployed people in Luton. If half of the proposed casino jobs went to unemployed people, this would represent a 7.5% reduction in unemployment.

The knock on effect on local tourism and ancillary services is more difficult to quantify, but in the case of a mixed-use scheme, LBC believes a Large Casino will kick start the regeneration process, supplement the proposed hotel and leisure offering, improve the take up of commercial office space on the site, help maximise the levels of employment and drive the much needed conference facilities. The local economy should also benefit through the triple effect of the casino purchasing goods and services locally, the casino's customers spending more of their consumer pound in Luton and the spending power of 600 staff.

Although LBC are not envisaging the same impact on employment, it is worth noting that a report by PriceWaterhouseCoopers refers to a statistic from the National Opinion Research Centre in the US that, "communities closest to casinos experienced a 12%-17% drop in welfare payments, unemployment rates and unemployment insurance."¹⁴

There are also concerns about the anti-social working hours of casino employers on family life, however LBC believes this not to be dissimilar to shift working in the wider leisure and hotel industry, the airport and 24 hour operation of other sectors of the economy. On balance, the Council is of the view that a Large Casino would have a positive impact on this particular quality of life indicator.

Access to health services

LBC are of the view that, subject to the implementation of policies towards prevention and treatment of any increase in problem gambling (and the provision of proportional /appropriate contributions from the operator to mitigate these) a Large Casino, taken in isolation, would have no net impact on this particular quality of life indicator. However, viewed as an important component of the vitality of a mixed-use scheme, then LBC are of the view that there might be demonstrable benefits to the community such as new Doctor or Dentist surgeries, or other community related facilities.

14: "The New UK Gaming Environment – Gamble or Sure Bet to Rejuvenate UK Leisure, August 2004", PriceWaterHouse Coopers, quoted in "On the Cards – The proposals for new casinos in London, November 2005", The Economic Development, Culture, Sport and Tourism Committee, London Assembly.

Education, skills and training

LBC believe that a Large Casino would impact positively on the provision of education services, skills and training in the Borough. LBC, in conjunction with the Learning and Skills Council, Job Centre Plus and local education establishments, would work closely together with the casino operator to develop a robust plan to ensure that local people and businesses have good access to the training, employment and procurement opportunities provided by a Large Casino.

The skills acquired by a Croupier and others in the hotel/leisure industries are regarded as highly transferable and a locally based industry training programme would help to broaden Luton's skill base and begin to reduce the primacy of, and dependency on, manufacturing. The University of Luton and Barnfield College have already indicated a willingness to develop training programmes at all levels – including a degree programme in Casino Management. Luton and Bedfordshire Learning and Skills Council is also keen to explore with an Operator the possibility of training people in the maintenance and programming of fruit machines and other electronic betting terminals found in the casino.

Provision of housing and services

As part of a mixed-use scheme, a Large Casino and hotel complex helps the economic viability of the project and, consequently, facilitates the more timely delivery of the housing element and the percentage of affordable housing as part of the S106 agreement. As part of a mixed use scheme, future residents will be aware of the casino element of a scheme prior to occupation. In the case of the Vauxhall Motors site, a casino would not be inserted into an existing community.

Crime

The nature and extent of a link between problem gambling and antisocial/criminal activity is unclear. One Australian Study showed that 36% percent of gamblers in treatment programmes had committed crimes that they attributed to their gambling problem¹⁵. Other studies have shown that in many cases criminal behaviour preceded the gambling behaviour and that the factors predisposing addiction may similarly predispose criminal activity.

LBC accepts that there is no evidence linking casino gambling specifically to a rise in antisocial behaviour or crime rates. Bedfordshire Police raised no concerns regarding the operation of a Large Casino on the Vauxhall Motors site. LBC are of the opinion that a Large Casino has no net impact on this quality of life indicator.

Comparable Initiatives

LBC were one of the first Authorities to introduce a programme dedicated to the reduction in associated night time alcohol related crime – known as Luton Safe. The Crime and Disorder Reduction Partnership (CDRP), involving Bedfordshire Police and other community partners, created successful initiatives that directly accounted for a 60% reduction in night time alcohol related crimes.

LBC is experienced in addressing and dealing with social issues in the community, responding to community concerns and delivering tangible results. The Council is well equipped to monitor and deal with any social issues that may result from any Large Casino.

A degree programme in Casino Management may be developed by the Univeristy of Luton

¹⁵: "The socio-economic Impact of Gambling on Iowa Citizens, Business & Government", Goss & Associates Economic Solutions, September 2, 2004 (Błaszczynski et al, 1989).

Social cohesion & sustainability

LBC have not conducted an assessment into the impact of existing casinos on social cohesion or the sustainability of communities. Factors contributing to social cohesion, and the impact a Large Casino might have, will depend on the exact leisure mix proposed, its position and proximity to the town centre, relationship to residential areas and schools, ethnic areas of concentration, the land use context, connectivity, competing retail offering and the support of the local residents and business community.

Luton's Citizen Advice Bureau (CAB) has raised concerns regarding the level of debt and money advice issues they have to deal with. 14,000 of the 46,000 enquiries received by the CAB were debt related issues, mostly relating to credit cards, store cards and bank loans. LBC will also ensure that a prevalence study monitors the level of debt related issues received by the Citizens Advice Bureau after the establishment of a new casino.

The proposed new Translink will pass in front of the site, helping to match need with opportunity.

Whilst a competitive and transparent tender process would take place in strict accordance to Government guidelines, LBC believe a new Large Casino should be situated away from the high street and require a specific decision to be made to travel and gamble there – further reducing the risks associated with ambient gambling. Imposing certain licensing conditions, as referred to elsewhere, will also help protect the young and the vulnerable

LBC anticipates that a Large Casino, as part of a large mixed-use regeneration project would satisfy the six main areas identified by the ODPM as contributing towards a sustainable community. Those areas are: inclusive and safe; well-run; environmentally sensitive; well-designed and built, well connected and served. LBC would ensure that any new development was environmentally sensitive, met the sustainable criteria relating to recycling, waste disposal and energy, and encouraged sustainable modes of production, consumption and transport. LBC would look to secure high levels of sustainability and increased biodiversity during the detailed design phase of any new Large Casino project.

LBC believe the proposals for a casino in a single modern iconic landmark building – as proposed on the Vauxhall Motors site - would be highly visible and help to create a “sense of place – a place with a positive feeling for people and local distinctiveness.”¹⁶

By siting a Large Casino in a new edge of town development, it would not be imposed on an existing community. People moving to the site will be aware that there are plans for a casino and hotel and be able make an informed decision accordingly.

Operators have indicated that a Large Casino on its own would not have the resources to contribute to the improvements of existing transport infrastructure or sustainable modes of transport, such as pedestrian and cycle routes, beyond what was in the immediate vicinity of the casino. LBC are particularly keen to promote a Large Casino on a site that displays these sustainable credentials. It would need to be highly accessible by all forms of public transport, not add to existing congestion in the town centre and be able to accommodate the necessary levels of parking associated with a Large Casino.

For example, the proposed new Translink (see map on page 21) passing in front of the Vauxhall Motors site will help to rejuvenate its employment status by further improving its connectivity with the town centre and the airport.

A new Large Casino, viewed in the context of a sustainable urban project will boost the local economy, contribute to local public services and transport infrastructure, create a landmark building, prime urban square and a sense of place. It will enhance the local environment and improve access to permanent jobs and training.

16: "The Components of a sustainable community in full, (4) Well Designed and Built", ODPM website.

Need for regeneration

Regional Planning Guidance for the South East (RPG9) identifies Luton as a Priority Area for Economic Regeneration i.e. areas of regional importance in need of regeneration strategies and resources to address economic deprivation.

The draft East of England Regional Spatial Strategy (RSS 14), also recognises the current imbalance between Milton Keynes and Luton and seeks to redress this by promoting growth in the Luton/Dunstable conurbation.

The Milton Keynes and South Midlands Sub-Regional Strategy identifies Luton as an area where growth must be focused in order to deliver important employment and housing goals. Unemployment in the area is above the regional and national average and Luton remains in the worst 20% of districts in England and Wales for income deprivation and the worst 25% nationally for employment deprivation. There is a clear need for concentrated efforts to support the continued regeneration of Luton's economy in order to achieve urban renaissance and regeneration, to transform the image and the townscape of the urban area and to improve the quality of development.

The confines imposed by the greenbelt around the town make it especially difficult to meet the competing demands on the limited developable land available for both housing and employment. Luton/Dunstable/Houghton Regis has a net employment growth target of 12,600 and a target of 26,300 new homes by 2021¹⁷.

The broader regeneration priorities for the Council include: accelerating the recycling of urban land; increasing the attractiveness of the town; improving public transport; achieving better quality developments; broadening employment sectors; expanding the tourism offering and ensuring the early delivery of sustainable urban extensions. LBC are also working with the Learning and Skills Council and Job Centre Plus to sufficiently match Luton's skills base with key economic growth areas, such as tourism and leisure.

The Regional Economic Strategy for the East of England (2004) seeks to improve employment access in Luton, raise the quality of the urban environment and harness the growth of London Luton Airport. Council is determined to capitalise on the proposed increase in passenger numbers through the airport and to expand associated tourism and business travel related facilities. LLA will continue to be a major driver for economic regeneration and LBC need to ensure that its regeneration policies accord with this expansion, and are able to capture the attendant visitor spend within Luton.

The details and timing of key public and private investment in Luton include:

Translink: A proposed guided busway system at the heart of Luton's Integrated Transport Strategy that directly addresses the needs of the commuters in the area. It will greatly improve the frequency, punctuality and the number of direct services to required destinations across Luton/Dunstable and Houghton Regis. It will provide direct access between the most deprived wards in Luton and designated employment areas – such as the former Vauxhall Motors site. It will also incorporate a Park and Ride site at junction 10a of the M1 motorway. Translink will directly facilitate the process of bringing the Vauxhall Motors site back into employment use.

The scheme, with a value in excess of £80 million, has Government approval and will be delivered by a public-private partnership.

Luton – recognised as an area of regional importance and a Priority Area for Economic Regeneration

17: Milton Keynes and South Midlands Sub-Regional Strategy, March 2005, Government Offices for the South East, East Midlands, East of England.

London Luton Airport Expansion: London Luton airport (LLA) is a major commercial airport that has become the second largest airport for business use in the country by percentage of traveller, after Heathrow. The Government's White Paper into 'The Future of Air Transport' anticipated that Luton has a pivotal role to play in the provision of runway capacity in the South East. Through an option to extend the existing runway or to construct a replacement full-length runway, the capacity could increase from 10 million passengers to around 31 million by 2030.

East Luton Corridor: Major improvements to a 2.3 km section between M1 Junction 10a and Airport Way. The scheme will upgrade the A1081 and A505 to dual carriageway and a new dual carriageway route will be provided from Kimpton Road to Percival Road and from there almost entirely dual carriageway to the M1 (see map on page 21).

It will improve access to existing and potential development areas and between public transport interchanges.

ODPM has agreed to contribute £17 million of the £22 million cost of the project from the Growth Area Fund (GAF) and the Community Infrastructure Fund (CIF) will provide the remaining £5 million. The application for funds to the ODPM was predicated on the closure of the VM site as it was acknowledged it would help to create new employment opportunities there. Facilitation work started on site in February 2006 and work will start in July 2006.

Luton Train Station: Luton has been short listed for £13 million of GAF to redevelop and upgrade Luton's main station, with plans to deliver major changes by the end of 2008.

St. George's Square and the Arndale Centre: The rejuvenation of Luton town centre is expected to begin with the transformation of St. George's Square into a vibrant and safe public space part funded by the Liveability Fund (ODPM), European Regional Development Fund and Luton Borough Council. The £2.2 million project will hopefully be completed in the autumn of 2006. The main shopping area, the Arndale centre, has been earmarked for a £20million face-lift, starting with an £8 million upgrade of town centre car parks.

Butterfield Park: Funded by the East of England Development Agency (£14m) and European Funding (£4.5m), the Innovation and Business Base (IBB), will provide first class accommodation for start up companies in the high-tech sector. The development also facilitates over 1 million square feet of business accommodation and will complement the existing Capability Green Business Park.

Preferred regeneration area

Former Vauxhall Motors site

The Vauxhall Motors Car Plant closed in March 2000. The original workforce on the site was 33,000 falling to 7,000 in the mid 1970s and declining further still to around 4,000 by the end of the 1990s.

LBC has resolved to grant planning permission subject to the completion of a S106 agreement and referral to the Government Office, for the significant mixed-use regeneration of this 22.7 hectare brownfield site on Kimpton Road, Luton. The site is 1.6 kilometers from the town centre and London Luton Airport is approximately 1 kilometre to the east. The Midland Mainline runs to the southwest of the site and Luton Airport Parkway station is only 250 metres away. M1 junction 10a are within 2.2 kilometers and directly linked to the site by the A505 (see map on page 21).

The former car plant is an historic, emotive and immediately recognisable site in a prominent position and elevation readily visible on entering the town. The proposal is to replace the existing 25 metre high Vauxhall Motors building with a new, modern landmark hotel, casino, conference, health and fitness centre – creating a natural focal point for the whole scheme and a landmark building for Luton.

The former car plant is an historic, emotive and immediately recognisable site

Outline planning permission includes the following:

- 14,500 square metre casino and conference centre and a 200 bed hotel and fitness centre
- Up to 45,000 square metres of office space
- Up to 11,950 square metres of small business and high-tech units
- Up to 7,432 square metres of retail warehousing
- Up to 4,000 square metres of neighbourhood retail and community facilities
- Up to 1,000 mixed tenure residential units
- 5,000 space airport related long stay car park

The indicative employment generation schedule for the development suggests it has the potential to generate approximately 3,200 full time equivalent jobs and the entire scheme has a gross development value of approximately £250 million (see inside front cover for image of the masterplan).

Additional Economic Value

LBC have not conducted a study into the anticipated Gross Value Added and additional economic value of a Large Casino. However, soundings from casino operators indicate that a Large Casino, including the associated restaurant and bars, would employ in the region of 600 people. It would also expect to have between 800 – 1,000 people through the main door of the complex per 16 hour day, which could equate to 365,000 visits a year.

LBC regards the development of a new Large Casino as part of an ongoing process of repositioning Luton as a leisure and tourist destination in its own right. By providing an enhanced leisure and tourist offering, LBC is working to attract more overnight visitors for a longer duration. 14.8% of all Staying Visitors were from overseas but they accounted for a substantial 39.7% of total visitor spend. It is the potential to increase this percentage of overseas Staying Visitors that LBC are keen to harness – a figure that will be inextricably linked with the airport's forecasted growth.

A Large Casino treated in isolation will have a limited multiplier effect. However, as part of a larger mixed-use scheme the enhanced multiplier effect would include:

- Improved occupancy rates at the adjoining hotel
- Increased visitor spend on leisure, gym and conference facilities
- Increased visitor spend in associated restaurants, bars, local services, retail and other tourist / leisure attractions
- Acquisition by the casino, hotel and leisure facility of services and provisions locally – leading to increase in local business revenues
- Enhanced attractiveness of neighbouring office accommodation and the site more generally – improving take up rates
- Increased levels of sustainable employment provided by the hotel and casino etc. leading to an increase in spending locally which feeds back into the local economy

It is the Council's belief that leakages out of the local economy could be mitigated through negotiations with developers and operators during both the planning and licensing processes. LBC will do everything possible to ensure that the Operators use local suppliers and train and employ local people.

Luton Borough Council believes the casino will act as a catalyst for redevelopment

LBC believes that the wider regenerative capability associated with a Large Casino, when treated in isolation, will be relatively small. The context and physical environment in which the Casino is to be located will play a pivotal role in deciding the level of benefit it will bring to the wider community.

The regeneration of the former Vauxhall Motors site, in itself, would be of huge benefit to the town and the wider economy. The Council believes that if a Large Casino only helps to deliver the strategic redevelopment of this major brownfield site, then that alone would be sufficient justification for its location there.

Willingness to licence

The Council's Executive ratified its decision to bid for one of the eight new Large Casino licences at a meeting of its Executive Committee on 27th March, 2006.

Market research

A poll conducted by BMG Research of a representative sample of 200 businesses in Luton found the following¹⁸:

- 58% of respondents were either strongly or slightly in favour of the development of a Large Casino on the former Vauxhall Motors site (32% and 26% respectively). 31% were strongly or slightly against the development (26% and 5% respectively). 12% had no opinion
- 49% of businesses polled thought there would be no negative impact of a Large Casino in Luton, whilst 26% thought problem gambling would be a consequence
- 49% thought Luton would benefit from the creation of jobs and increased wealth as a result of a Large Casino and 22% thought it would create a new entertainment destination and increase tourism. 10% thought it would improve the image of Luton. 23% thought it would have no positive impacts

58% of respondents were in favour of a Large Casino on the Vauxhall Motors site

Planning Application – Vauxhall Motors site

LBC notified 1,461 local residents and other adjoining land interests regarding the outline planning application for the Vauxhall Motors site. Notices were also posted and details of the application were placed in the local newspaper. In total, LBC only received 18 letters of objection and a 120-signature petition (unrelated to the Casino). The highest 'frequency of comment' in relation to objections to the proposals were regarding the density of the development (33%) and parking (28%) – and not the casino.

Other Consultations

On the 2nd March 2006, LBC sent in excess of 400 letters and emails to a wide range of community stakeholders asking their views on 4 questions:

- What benefits do you think a large casino would bring to Luton?
- Are there any benefits directly for your organisation or business?
- Are there any measures needed to ensure that Luton maximise the regeneration benefits?
- Do you support the proposal for a new casino in Luton or not?

¹⁸: BMG Research carried out 200 telephone interviews with a representative sample of businesses in Luton between the 13th and 18th March, 2006. A full copy of the responses is available on request.

Tourism and Leisure Strategy

Luton's Tourism strategy 2003-2006 does not refer specifically to casinos. However, it is clear that a Large Casino in conjunction with a 4/5* hotel, conference centre and gym – as proposed on the former Vauxhall Motors site – would accord with the key principle and the majority of the aims (refer to pages 2-4).

A summary of
responses to LBC's
consultation

Organisation or Resident	Individual and Position	Key issues raised
East of England Regional Assembly	Brian Stewart, CEO	Unable to express a view and unable to comment or endorse any particular proposals coming from any locality in the Region.
East of England Development Agency	Neil Hayes (on behalf of David Marlow, Chief Executive)	EEDA will be making a submission to the Casino Advisory Panel on the regional priorities for casino related developments. However, Luton has been, and remains, a major regeneration priority for EEDA.
Bedford and Luton Economic Development Partnership	Andrew Duncan Partnership Investment Officer	Supportive – jobs make valuable contribution to sub-region's target and welcomes multiplier effect. Raises Luton's profile as a leisure destination. 4/5* hotel would add value to Luton's hotel offering. Casino would also complement other aspects of Luton's regeneration.
Luton Forum (Local Public Service Board)	Julian Sears, Chairman	On balance supportive to keep option for the regenerative impact of a Casino open but with concerns about how social impact would be managed.
Local Member of Parliament	Margaret Moran MP	Supportive
Chamber Business	Cheryl Smart Director of Commercial Services	Supportive – boost the local economy, compliment existing and planned regeneration activity and provide the town with much needed additional leisure facilities.
Luton University	Professor Les Ebdon Vice Chancellor and Chief Executive	Supportive – could aid regeneration of local economy and offered to develop a degree programme in Casino Management – if the demand was there.
Barnfield College	Peter Birkett Principal and Chief Executive	Supportive of the concept of a new casino in Luton.
Resident	Toney Mooney	Supportive – far more benefits than problems.
The Mall Arndale Luton	Brian McFarland General Manager	Supportive – national recognition for Luton, additional local jobs, enhance conference venues and bring additional visitors to the Arndale Centre.
Resident	Alan Pleasant	Supportive – it would bring additional work to the area and be a useful facility for travellers and airport users.
Watford Electronics	Nazir Jessa Chairman	Supportive – Bring more jobs to the town, visitors from Europe and more restaurants will need to be established.
Resident	Lee Allen	Supportive – more jobs would be great in conjunction with airport expansion; Luton's future could be brighter.
Luton Borough Council, Community Safety	John Harper	No objection from a local democracy or community safety issue
London Luton Airport		Reserving their position
Voluntary Action Luton	Anne Laing	Mixed feelings – casino seedy but job generation good.
Luton NHS Primary Care Trust	Regina Shakespeare Chief Executive	Objects – whilst the aim of increasing leisure and tourism investment in Luton is laudable, a large casino could bring increased health to our more vulnerable populations.
Personal View	Gill Sharp	Objects – I am old fashioned in this regard
Personal View	Barry Mayes	Objects – inappropriate to tempt people to gamble (on faith and religious grounds), casino used for money laundering.
Personal View	Nigel Hyde	Objects – gambling becomes an addiction and ruins lives.
Personal View	Janet Montgomery	Objects - gambling becomes an addiction and ruins lives.
LBC, Social Inclusion	Sarah Allen	Objects – probably lead to more debt counselling required, standard and quality of jobs debatable.

Probability of implementation

Demand

LBC have not carried out a market demand analysis amongst residents or tourists. However, the Council has awarded outline planning permission for casino use to two further sites other than Napier Park.

Rank Gaming Group were granted outline planning permission for 2,790 square metres of casino use on the former Courts Warehouse in the town centre. The Thistle Hotel was also granted permission for 901 square meters of casino use on the second floor of their premises in St. George's Square. There is implicit recognition of unmet demand for a Large Casino offering in Luton.

Catchment

Casino operators have indicated that the catchment area for a large casino could be anything up to an hour and a half travel time, incorporating towns such as Oxford to the West, Northampton, Milton Keynes and Bedford to the North, Cambridge to the North East, Stevenage to the East and the multitude of satellite towns to Southeast and west of Luton including: St. Albans; Watford and Hemel Hempstead (see map on page 22). Given its proximity to a wide range of transport options, including the airport, motorway and Midland Mainline link to Kings Cross (and eventually Eurostar), it is likely that the casino will serve an area far beyond the confines of the Borough.

The catchment area for a large casino could be up to an hour and a half travel time.

In the case of the Vauxhall Motors site, the Council's requirement for the highest quality hotel, gym and conference facility, combined with the sites unparalleled connectivity and access to an expanding market via LLA, has led us to believe that a Large Casino would have a very high probability of being implemented in Luton.

Site Selection

Together with any statutory requirements LBC would carefully consider a range of premises criteria before awarding the new License to a casino operator, Which could include the following:

- It should protect children and other vulnerable people
- It should maximise the employment and regenerative benefits of a site whilst mitigating any negative impact
- It should demonstrate high accessibility, particularly by public transport, whilst recognising the likelihood of increased private car journeys
- It should be located away from everyday high street shopping, to minimise loss of amenity and to minimise ambient or impulse gambling opportunities
- It should be sited as part of a clearly defined and separate leisure/entertainment destination, again to minimise ambient or impulse gambling opportunities
- A location that would enable the Council to best monitor its social impact

Should LBC be successful, it will conduct a fair and transparent tender process as outlined by the DCMS/ODPM in their guidance which we understand is due to be published in early 2007.

Existing and Proposed Infrastructure: See map on page 21 and chapter 'Need for Regeneration'.

Current Provision of Gambling

Casinos

- Grosvenor Casino (Rank), Dunstable Road, Luton, LU1 1EB
- Stanley Luton Casino, Skimpot Road, Luton, LU4 0JB
- Stanley Luton International Casino, 85 Park Street, Luton, LU1 3HG

Bingo Halls

- Gala Clubs, The New Galaxy, Bridge Street, Luton, LU1 2NB
- Mecca, Skimpot Road, Luton, LU4 0JB

Bookmakers

- 10 x Ladbrokes Betting Shops
- 4 x William Hill

LBC does not rule out the possibility that existing casino operators in the town may bid successfully for the new licence

LBC assumes there will be a limited impact on existing casinos, however it is aware that no study has been undertaken to quantify the precise impact of a Large Casino on existing casinos and other gambling venues. In order to try and mitigate its impact, our preferred location for a new casino is outside the town centre and close to the airport. **However, the Council does not rule out the possibility that existing casino operators in the town may bid successfully for the new licence.**

LBC have not consulted with casino operators regarding the potential critical mass effect of a cluster casino and leisure based activities.

The Council is aware that a number of casino operators have made approaches to the developers of the Vauxhall Motors site, but we have received confirmation from the developers that no preferential or exclusive arrangements have been entered into. Similarly, LBC has held discussions with a number of operators who have expressed an interest in locating in the town, including Kerzners and Sun International and we believe further interest will grow once the ability to grant a licence becomes apparent.

LBC has not entered into any form of agreement or arrangement with a potential Operator that could in any way prejudice the intention of the Act, which envisages an open and transparent competition.

Regional and local context

When considering appropriate locations for a casino outside town centres, PPS6 advises the adoption of a sequential approach as well as material consideration to be given to physical regeneration, employment, social inclusion and economic growth. Whilst LBC acknowledges that adopting the sequential approach means that first preference should be given to locations in appropriate existing centres, the case for the Vauxhall Motors site – in terms of physical regeneration, employment and economic growth, and excellent transport links – in spite of its edge of town centre location, is exceptional. Set in this national policy context, and set against the backdrop of the Government’s sustainability agenda, LBC believe that a Large Casino is fully justified as part of a larger mixed-use scheme on this site.

The Chief Executive of the East of England Regional Assembly has requested that we include the following paragraph in our submission to the Panel:

“We (LBC) have made the East of England Regional Assembly, as Regional Planning Body aware of our proposals and we note that the Assembly will have a later role in the whole process. The Draft East of England Plan sets a positive context for the provision of casino developments in the East of England. The location of the regional casino, and one or more large/small casinos in the region would be entirely consistent with the focus of the Plan on securing appropriate economic regeneration and enhanced economic growth. The Plan sets out a criteria based approach to strategic tourism and leisure facilities. We understand that the Assembly will be providing advice to the Casino Advisory Panel in April 2006.”

The draft revision to the Regional Spatial Strategy (RSS December 2004) addresses the relationship between Luton /Dunstable and Milton Keynes by stating; “Rapid Growth at Milton Keynes has been beneficial by increasing housing, job, and cultural opportunities, but it has also had adverse effects, attracting prosperity away from Luton/Dunstable and Bedford, and creating adverse community trends. The strategy seeks to build on and redress the balance of this relationship, while integrating with the sub-regional strategy for Milton Keynes and South Midlands area.”

The RSS has also identified the sub-region Luton/Dunstable/Houghton Regis as a Priority Area for Economic Regeneration (SS11) and as such a focus for more sustainable economic, social and environmental development. The redevelopment of the Vauxhall Motors site also accords with the Regional Spatial Strategy policy on the expansion of London Luton Airport, which recognises that there is limited land available within the airport site to accommodate operational and other directly associated airport employment use and that some will need to be located on other neighbouring commercial sites (Policy BL1: London Luton Airport, Luton Borough Council Local Plan).

The Council’s recognition of the Vauxhall Motors site as an appropriate location for a new casino contributes to the target, set out in Policy SS24 of the East of England Plan, of at least 60 % of all new development in the region to take place in or using previously used land or buildings.

The majority of development planned for the sub-region will be focused on the key growth towns including Luton. Growth is also encouraged in the MKSM Sub-Regional Strategy to be made from sustainable urban extensions well served by public transport. Luton/Dunstable/Houghton Regis have been targeted to provide 26,300 new homes and net employment growth of 12,600 jobs by 2021.

A Large Casino on the Vauxhall Motors site is fully justified in a regional and local policy context

19: “East of England Plan – Draft Revision to the Regional Spatial Strategy (RSS) for the East of England”, East of England Regional Assembly, December 2004.

The proposals for the regeneration of the Vauxhall Motors site indicate the provision of up to 1,000 mixed tenure residential units as well as 3,200 full time equivalent jobs. In the context of regeneration, housing and employment growth strategies identified at regional and sub-regional level and having regard to the facts above, it is considered that the issues of need at both the local and regional level are acceptably addressed by the proposals for a large mixed-use development on the former Vauxhall Motors site.

The Council were also satisfied that a casino on the Vauxhall Motors site accords with the 6 objectives of Policy KR1 of Luton Borough Council's Local Plan that are:

- To maximise both the quantity and quality of job opportunities
- To maximise the opportunities presented by major previously developed sites
- To ensure any proposed development does not have an adverse effect upon the operation or amenity of neighbouring uses
- To enhance the overall appearance of the site to the maximum possible effect
- To seek to ensure development within a reasonable period of time
- To ensure that any development does not have any adverse effects upon the vitality of the town centre

The Council also believe that a Large Casino, as part of a mixed use scheme, would help to achieve the following key aims by 2012 as set out in Luton's Community Plan²⁰:

- A Working and Prosperous Luton – that the town has a well trained work force and a thriving business sector where opportunities for employment are maximised and where workers receive higher than average salaries.
- A Dynamic and Creative Luton – Luton is a creative, dynamic and imaginative town with a positive image locally and beyond, and with a varied cultural life supported by better recreational and entertainment facilities.

20: "Luton's Community Plan 2002 – 2012 (2005 Revision)", Luton Forum.
21: "Building a Sustainable Economy: The Joint Economic Development Strategy for Bedfordshire and Luton", Bedfordshire and Luton Economic Development Partnership, June 2005.

The Joint Economic Development Strategy, "Building a Sustainable Economy"²¹, recognises London Luton Airport as a key asset of the sub-region and the need for the Local Authority to harness the economic and employment benefits that will spring from its planned expansion. There is also a growing awareness that major regeneration schemes in Luton will enhance the town's position at the heart of the Oxford to Cambridge Arc.

Community benefits

Whilst having due regard to the wider regenerative benefits, the multiplier effect and job creation, LBC would also seek to maximise the possible licensing gain for the benefit of the community.

LBC believe the following benefits might be accrued:

- A co-funded Casino Management Course as proposed by Luton University
- A dedicated local croupier training programme – to help match the skills base of the local community
- Where possible, services and employees should be sourced locally first
- A contribution should be made for the provision of public works of art, improved street design and safety
- Appropriate contributions to local infrastructure, traffic management programmes, public open spaces or local community groups and charities
- The funding of local prevalence studies
- Where necessary, contributions to debt management counselling services at the Citizens Advice Bureau based on certain trigger levels after the casino has started operating
- A budget for advertising the services of GamCare, GamAnon and other local services such as the CAB

In addition to any gain negotiated during the licence tender process, outline-planning consent for the former Vauxhall Motors site has been granted with the following prioritised S106 Heads of Terms in place:

A financial contribution for the construction of the East Luton Corridor Scheme junction improvements; works or funding for improvements to M1 Junction 10a; provision of a pedestrian route from the development to the Luton Parkway Railway Station; a financial contribution to off-site children's and adult's outdoor sports facilities with 10 years maintenance costs; the provision of a Local Equipped Area for Play (LEAP) with 10 years maintenance costs; the provision of on-site affordable housing to help meet the identified housing needs of the Borough; a financial contribution to classroom expansion at two local schools; provision of a community facility to meet the needs of local residents; a financial contribution towards Translink construction costs or other alternative public transport provision; the funding of on-site waste collection, recovery and recycling facilities; and the funding of a community facility if need is generated.

Casino employees and services should be sourced locally in the first instance

Unique characteristics

The case to support a Large Casino in Luton, and more specifically on the former Vauxhall Motors Site, is almost without parallel.

Luton has a catchment of 27 million people, nearly half the population of the UK, within a 2 hour travel time. The extensive brownfield former Vauxhall Motors car plant site is less than 30 minutes by train from Kings Cross and an hour from the Midlands. It is 15 minutes drive from the M25 and 5 minutes from the M1. It has a major airport less than a mile away serving 100 European and international destinations, opening up an even greater catchment within an hours flying time. Furthermore, the site will also incorporate a shuttle from the proposed hotel, casino and conference centre to the airport via a dedicated long stay car park, as well as being served by Translink.

We do not believe that any other socially deprived location can compete with Luton, and in particular the Vauxhall Motors site, in being able to provide such a facility to so many people.

The Government has always seen casinos as a mechanism to drive regeneration.

Where better to fulfil this aim than on an ex-car plant in the centre of a socially deprived Objective 2 area and a Priority Area for Economic Regeneration, where it will not only provide up to 600 direct jobs but kick start investment to provide a further 3,000 jobs?

Capability Green Junction
Grade separated junction
retained, eastbound
on-slip road extended

Kimpton Road
Windmill Junction
Mini-roundabout replaced
with traffic signals

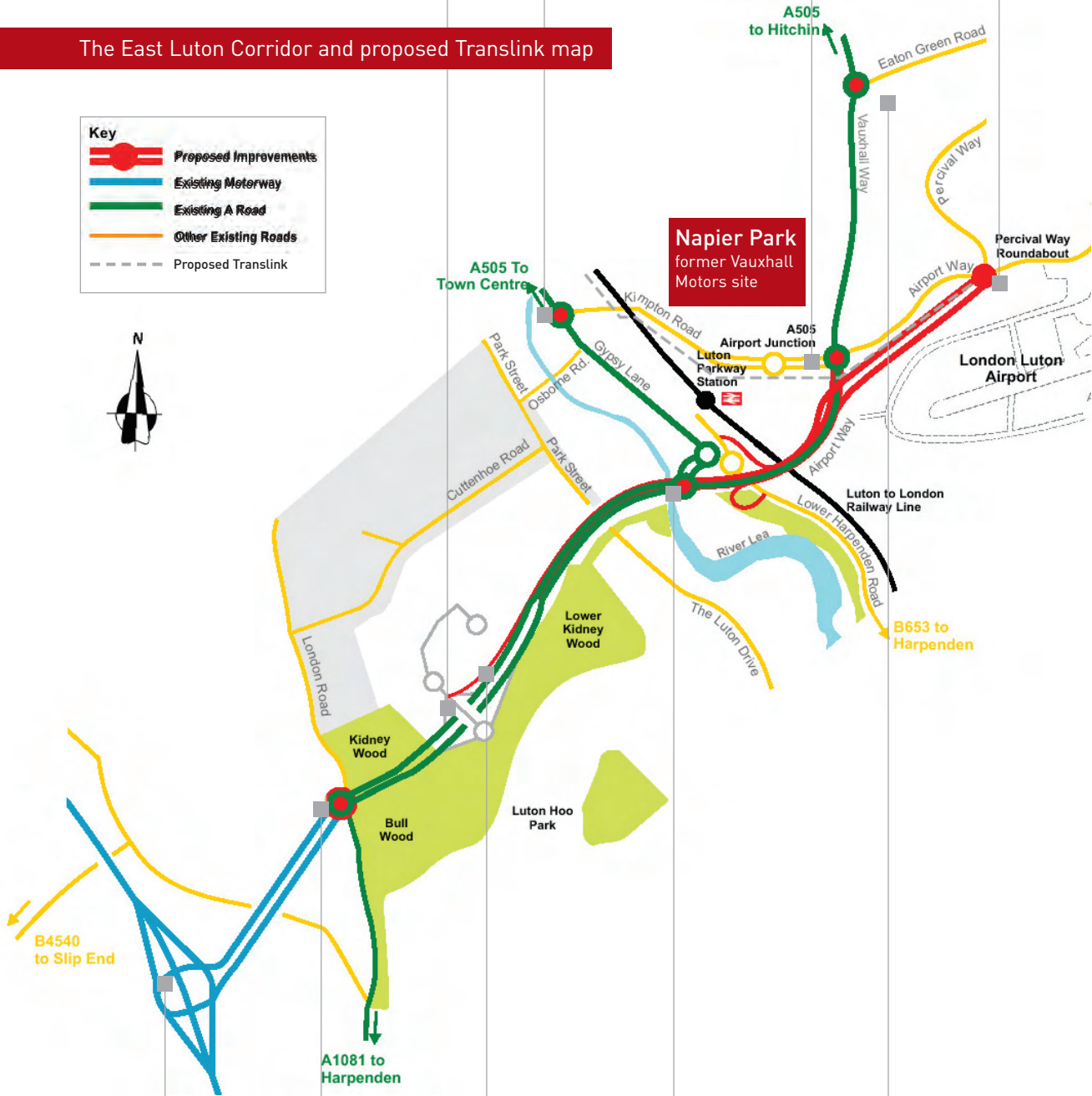
Vauxhall Way,
Kimpton Rd
Roundabout replaced
by traffic signals

Airport Access Rd
New dual two-lane
carriageway leading
to enlarged round-
about at Percival Way.

The East Luton Corridor and proposed Translink map

Key

-  Proposed Improvements
-  Existing Motorway
-  Existing A Road
-  Other Existing Roads
-  Proposed Translink



M1 (J10, 10a)
Proposed
improvements

M1
Widening

Capability Green to
Kimpton Rd
Existing single
carriageway dualled

Gipsy Lane
Roundabout
Roundabout replaced
with traffic signals.
No right turn from
airport into Gipsy Lane

Eaton Green Rd
Vauxhall Rd Junction
Roundabout replaced by
traffic signals, arm serving
the Vauxhall carpark
closed and alternative
access provided by an
improved entrance/exit
on Vauxhall Way

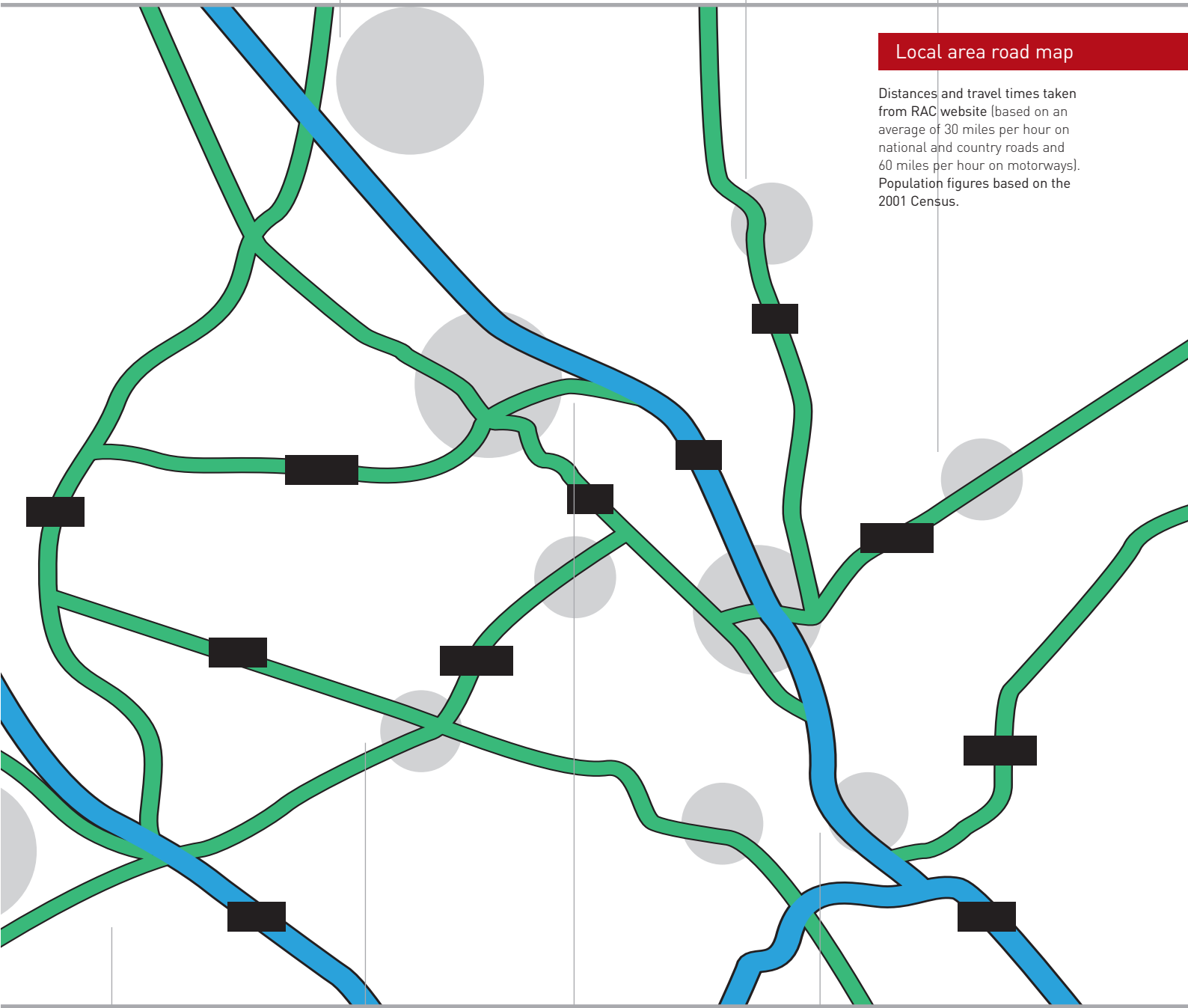
Northampton to Luton Airport
61.9km (38.4 miles)
43 minutes
Population: 194,458

Bedford to Luton Airport
29.5km (18.3 miles)
39 minutes
Population: 147,911

Stevenage to
Luton Airport
24.3km (15.1 miles)
27 minutes
Population: 79,715

Local area road map

Distances and travel times taken from RAC website (based on an average of 30 miles per hour on national and country roads and 60 miles per hour on motorways). Population figures based on the 2001 Census.



Oxford to Luton Airport
118 km (67.4 miles)
1 hour, 18 minutes
Population: 134,248

Aylesbury to Luton Airport
41.4 km (25.7 miles)
40 minutes
Population: 165,748

Milton Keynes to Luton Airport
40.8 km (25.4 miles)
40 minutes
Population: 207,057

St Albans to Luton Airport
18 km (11.7 miles)
18 minutes
Population: 129,005