



17 Ashfield Road
Blackpool
FY2 0DH

**REQUEST TO PARTICIPATE AT EXAMINATION IN PUBLIC FOR
REGIONAL CASINO PROPOSAL IN BLACKPOOL**

Dear Professor Crow

Further to your request for representations from those wishing to participate in the planned Examinations in Public for Regional Casino licences, I write on behalf of the national Campaign Against Super Casino Expansion with a request to take part.

CASE (www.thecase.org.uk) is a national campaign with support from across the country and we welcome this opportunity to air arguments concerning both the merits and the risks associated with the Regional Casino development in Blackpool. We believe strongly that the debate concerning the Regional Casino in Blackpool has so far been overwhelmingly one sided and that the EiP process represents an important opportunity to raise matters of which some stakeholders may be unaware.

It is noted that, as you make clear in your guidance notes on the subject, national casino policy has been settled through primary legislation. Accordingly, it is not our intention to address to the EiP general arguments against Regional Casinos. Instead, CASE's intention is to outline what we see as the shortcomings of the particular bid put forward by the local authority in Blackpool.

With that in mind, I have set out in the appended note a brief précis of what we see as the essential flaws in Blackpool's bid, on which subject we would look to expand in the context of the discussion framework afforded by the EiP process.

With this in mind, we would very much welcome the opportunity to take part in the EiP in Blackpool, and look forward to hearing from you in due course regarding arrangements.

Yours sincerely

Councillor Steven Bate
On Behalf of the Campaign Against Super Casino Expansion

Briefing note

10 August 2006

Re: Problems arising from Blackpool's bid for a Regional Casino licence

Social Impact: Our starting point is that Blackpool, being unique both as compared to other seaside resorts but even more acutely in the context of those other potential locations for a Super-Casino, already exhibits, amongst its indigenous population, a significantly higher propensity to gamble.

Blackpool has not undertaken any meaningful baseline study and were it to do so, we believe the particular difficulties within the area would be highlighted. While Blackpool's submission refers to 'innovative and effective' strategies adopted by the town to help manage social issues, in reality, such schemes are now commonplace throughout the country. For instance, Alcohol Harm Reduction Strategies are now in almost universal use as a result of the implementation of crime and disorder legislation.

The report published in February 2006 by economic consultants Hall Aitken estimated that the number of problem gamblers in the casino's catchment area could increase from an estimated 4486 to 6191 costing an additional £15m per year by 2010.

The submission describes the town as 'uniquely placed' yet it is the town's very uniqueness that makes it an unsuitable location for '... the best possible test on social impact'. Indeed, the Council expects that 90% of the casino customers will be visitors to the town, noting that Blackpool has an exceptionally wide catchment with substantial numbers of visitors from Scotland, the North East and the Midlands comprising both the current and prospective target market. Accordingly, because 90% of the casino customers will be visitors, only 10% of those using the casino are expected to be local residents. It is impossible to suggest that Blackpool would represent 'the best possible test of social impact' when it will be effectively impossible to 'test' more than 10% of the casino's customer base.

Tourism and regeneration: Blackpool's case for a Super-Casino is based on the need to protect tourism in the area and the Council states in the submission that it sees the development as 'a dramatic new catalyst'. There is a single-minded assumption that only a Super-Casino will deliver the necessary regeneration. Yet these assertions do not bear scrutiny - in fact Blackpool, despite a decline in overall numbers, remains Britain's busiest seaside resort with some 11 million visitors per annum.

It is also incorrect to suggest that the town is lacking in regenerative investment. Certain local businesses have invested heavily in recent years and, for instance, Blackpool Pleasure Beach remains Britain's most visited attraction. To their credit, the Council obtained ODPM consent to the establishment of an urban regeneration company, ReBlackpool, and, under its auspices, significant investment projects are already underway at Talbot Square, the airport and on the Promenade where a £20m scheme is underway for infrastructure and environmental improvements. In addition, the town centre is undergoing a £30m redevelopment. Neither the creation of the URC nor the subsequent redevelopments, described above, were predicated or dependent on the success of the Blackpool bid. Indeed, given the uncertainty of the bid, URC status would not have been granted had the ODPM taken the view that regeneration would not occur without Super-Casino development.

Because Blackpool's existing leisure economy is so heavily dependent on facilities similar to those that would be offered by a regional casino, the diversion of consumer spend and

accordingly the substitutionary impact of any new jobs created or investment attracted will be particularly acute. It follows that not only is Blackpool the wrong test-bed for social impact, regenerative gains would be more questionable, harder to analyse and less typical than elsewhere.

Basis for proposal/Public Consultation: As in the case of many of the other bids, the suggestion that there is wide-scale public support should be examined critically. In Blackpool's case, the "master plan" which has formed the basis of most of the Council's publicity drive was originally based on the prospect of four Super-Casinos. The master plan implied a scale of redevelopment wholly out of line with that likely, less still certainly, to be the result of the award of the single regional casino licence. Even now, the Council's recent exhibition implies the construction of two regional casinos and it is believed that the benefits predicted by their bid assume not only that there will be a lifting of the present cap but that Blackpool would automatically receive the right to grant a second licence. That premise is undisputedly false.

Finally, reliance on the Pion study is misplaced as that study was in turn based on data, which Pion accumulated when working for vested casino interests prior to the passage of the Gambling Act.