

SUBMISSION BY MICHAEL EDWARDS TO THE CASINO ADVISORY PANEL

1. Blackpool Council's case is based on:-

- (a) Regeneration Regenerative claims for a regional casino, coupled with the assertion there are no 'viable alternative regeneration strategies'.
- (b) Support for the bid Assertion that support for the bid is 'virtually unanimous'.
- (c) Minimal opposition Assertion that opposition is from 'a small anti-gambling lobby'.
- (d) Understating the problems Assumption that the only negative outcomes are problem gambling/crime/anti-social behaviour.
- (e) Misrepresentation Assertion of 'limited private sector investment in the last two decades'.
- (f) Suitability of the site Assumption that the designated site is suitable.

2. Regeneration 1(a)

A press release as recently as 9th August 2006 by URC ReBlackpool claims that 20,000 jobs will be 'created' by the project. Best estimates from actual case studies is that 2000/3000 low grade jobs would be created by a *successful* project, without allowing for the loss of jobs in the existing hotels and catering, leisure businesses and casinos. Blackpool's schools, medical facilities, housing and infrastructure could not cope with such a massive increase in population.

Cities, towns and resorts worldwide have generated significant visitor numbers without the introduction of large scale gaming facilities. Blackpool's reliance on traditional attractions brought about its dominance as the UK's No 1 resort.

There is an insatiable demand for large and small conferences, exhibitions, festivals, concerts, sport and public participation events. The majority involve stopovers rather than day trips. Blackpool's conference officer is under-resourced and hard-pressed serving and retaining existing conferences. There is no dedicated 'festival' team creating new events, expanding/promoting existing ones, and 'poaching' others.

In 2001 Blackpool nailed its flag to the 'hotel resort casino' mast to the exclusion of other initiatives. The seaside resort Dun Laoghaire 'invented' the 'Festival of World Cultures'. That town does not share Blackpool's wealth of venues, accommodation and visitor attractions, yet by 2005 the three day annual festival had grown to 160 events at 40 venues with participants from 50 countries attracting over 200,000 visitors.

During the same period Blackpool lost several significant events, despite allocating over £1 million per annum to the out-dated Winter Gardens conference venue.

Creating a 'festivals' team with a fraction of this sum would go a long way to reversing the decline in visitor numbers, without resorting to the unknown quantity of a regional casino.

Tourism is Blackpool's lifeblood . It cannot afford to gamble on being a 'pilot' scheme for the UK.

3. Support for the bid 1(b)

This assertion has no basis in fact. Requests for a referendum have been rejected. The surveys/polls relied upon were restricted in scope and content, and biased in their approach. The percentages quoted are valueless and out of date. They were conducted on the basis of several regional casinos creating 30,000 'new' jobs. In 2001 the 'vision' was 5/6 casinos on a Las Vegas scale. By the Public Inquiry in 2004 this had shrunk to a 'cluster' of casinos on 4 sites across the town. The Council accepted the Inspector's decision allowing just 1 on the bid site. The panel should disregard the surveys/polls when considering such an important aspect of the bid.

4. Minimal opposition 1(c)

In reality opposition is widespread, including those opposed to gambling per se through to those opposed to the degenerative impact of a regional casino. The Council's submission is misleading when referring to support for/opposition to its bid. For example, the statement on page 11 paragraph 4.2 "Only 7 respondents submitted objections in principle to casino development at the first and revised deposit draft stages ". In fact, those respondents included groups representing considerable numbers of objectors. A 'survey' published by the local newspaper claimed 91% support for a casino. Only 100+ people responded to the 'survey'. This is typical of the 'statistics' employed by those promoting the bid, and in the Council's submission.

5. Understating the problems 1(d)

The bid deals extensively with negative outcomes of a regional casino in relation to problem gambling, increased crime/anti-social behaviour. It outlines proposals for addressing these problems, but not the negative effects on existing hotel and catering businesses, leisure outlets and the three 'small' casinos.

Blackpool has the largest concentration of holiday accommodation in the UK outside London.

They are the bedrock on which the town's success has been built. Foxhall Village, adjacent to the casino site, is accepted as the world's first working class mass accommodation area. This unique area is central to the town's ambition to achieve World Heritage Site status. Village residents have ambitions to regenerate the area, which would be sabotaged by a regional casino complex. They have been motivated because their area has never figured in the town's Master Plan.

Foxhall Village, the area south of the Village and the area to the east of the proposed casino site encompass the overwhelming majority of hotel, catering and leisure outlets in Blackpool. They could not compete with subsidised hotel, catering, retail and leisure outlets in a self-contained casino complex. Such subsidisation is the reality elsewhere in the world. Despite their, and the Council's, protestations to the contrary, the operators of a casino complex in Blackpool would be no exception. Commercial necessity dictates a policy of subsidisation. The Council's bid is silent on this problem. It is apparently content to abandon its core industry to unrestricted 'market forces'. None of the other short listed cities/towns has this major downside.

6. Misrepresentation 1(e)

The existing hotel and catering industry is, collectively, the largest employer and the largest landowner with the biggest investment in Blackpool by any standard. Individually, from their own resources, most of these outlets have invested significantly in their premises and the promotion of the town in the last two decades. They are the biggest contributor to business rates, yet have received minimal local, regional, national or European grant aid. Their initiative has not been matched by Council investment in the core tourist industry during that period. Its track record, demonstrated by virtual omission of existing businesses in the bid and the Master Plan, suggest there will be no change in the Council's priorities. Indeed the declared intention is that windfalls generated by such a project will be directed almost exclusively to residential areas. This thrust of the Council's regenerative ambitions is confirmed throughout the bid.

It is indisputable that the prosperity of Blackpool as a whole, from its earliest days as a resort, has depended on the success of its existing hotel and catering industry. Experience shows that a concentration of regeneration initiatives on that sector would have a trickle down effect on the prosperity of the rest of the town. Neglect of the sector, or worse still, actively endangering it by a casino project will ensure the decline of the town, stressed by the Council at the very outset of the bid as

“conspicuous in its physical appearance and the statistics that describe its social and economic condition.”, will continue.

7. Suitability of the site 1(f)

The bid site is the only location designated in the approved Local Plan for a regional casino. The current planning application submitted by ReBlackpool is stated “not to be the one for delivery” but intended to “strengthen its bid further in the area of ‘willingness to licence’.” This follows the line taken since 2001 with previous ‘visions’ for development of the site, all of which (having hyped the advantages to Blackpool of a casino) appear to have been abandoned.

Oddly, the present outline application is for two casinos on the site, and includes an adjacent area outside that indicated in the bid. Even with this addition the site will not accommodate two regional casino complexes on the scale envisaged in the bid.

A regional casino will include a large hotel, retail, catering and leisure outlets and, crucially, 1,250 ‘slots’ as the engine of profitability. The electricity requirement for these ‘slots’ far exceeds the available supply, or what could physically be supplied for them. The particular area of Blackpool is supplied from a substation in Coop Street with infrastructure dating back to Victorian times. This substation has insufficient output to service 1,250 modern slots, with their considerable demand. The lack of suitable sites for an additional substation within reach of the casino site, exacerbated by the narrow Victorian street pattern of the adjacent areas, means there is no scope for providing the massive electricity supply required for the slots apart from the additional demands of a regional casino complex.

A minimum 4 year construction programme for a regional casino complex in the heart of Blackpool’s existing accommodation areas would devastate those businesses. This is amply demonstrated by the nearby development of a Debenhams store, which is causing considerable damage to neighbouring hotels and businesses due to noise, dust and the problems caused by construction traffic. It will continue to do so for up to 2 years. This is dwarfed by similar problems that would be caused to the hundreds of hotels etc. in the areas immediately adjacent to the designated casino site.