

Valerie Curtis
Casino Advisory Panel Secretariat
Department for Culture, Media and Sport
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20 October 2006

Dear Ms Curtis,

I wanted to take this opportunity to thank the Chair, the Members and the Secretariat of the Casino Advisory Panel for your careful consideration of the issues pertaining to our proposals for a regional casino for Manchester. We have found this independent process to be both challenging and constructive and we appreciate the opportunity to make further representations at this stage.

As you know, earlier this month Manchester City Council submitted a number of documents to the Casino Advisory Panel, including an independent analysis conducted by Cambridge Policy Consultants (CPC) of the work carried out by Pion Economics on behalf of Blackpool Borough Council and the North West Development Agency (NWDA). A further note from Pion on their work and a letter from Blackpool Borough Council on the economic, regenerative and social impact of a regional casino in the town, have since been made available. CPC have conducted a further analysis of these latest documents from Pion and Blackpool Borough Council. CPC have found that these latest submissions allay none of the serious concerns which CPC expressed in their report submitted on 6 October.

As CPC's latest analysis shows (a copy is enclosed), these further submissions only add to the confusion about the assumptions on which Pion, and Blackpool Borough Council, base their assessment of economic impact. We maintain, therefore, that the decision of the NWDA to prioritise the development of a regional casino in Blackpool over Manchester is an inappropriate policy based on an unsound and inscrutable evidence base.

As we demonstrated at our Examination In Public, Manchester City Council has the commitment and expertise to put in place robust mechanisms for preventing and responding to the social impact of gambling - indeed we are recognised as a thought leader in this regard by one of the world's most respected problem gambling experts, the former Chief Executive of GamCare, Paul Bellringer OBE, as his enclosed statement confirms. Since 2004 Manchester City Council has sought to understand in detail the best ways mitigate the negative consequences of gambling. This work has resulted in the formulation of a Responsible Gambling Unit (RGU), and we will be launching widespread consultation imminently to confirm that our proposals meet the practical needs and high expectations of Manchester residents and stakeholders.

We have already spoken in detail to gambling operators with a presence in the Manchester area to outline our plans, and our proposals have been met with unanimous support and a willingness to fully commit to the project.

The RGU will provide a single unit which leads the city's approach to gambling related issues. The City Council will drive forward the delivery of the Responsibility Gambling policy through key partners and delivery agents, such as the Police and the Primary Care Trust, to ensure a joined up and effective approach to the social

impacts of gambling. We are currently finalising our draft Responsible Gambling Policy for consultation. I will forward you a copy of this document upon its release.

We believe that the prioritisation of social impact issues resulting in a pioneering and holistic approach to social responsibility is of the utmost importance in determining whether the regional casino pilot is an effective test. We are therefore at a loss to understand why the NWDA did not consider social responsibility issues at all when making its judgment as to which location to prioritise for the regional casino.

One of the key criterion for the regional casino is that it must be able, in its eventual location, to deliver the optimal level of economic development benefit and therefore meet the regeneration test. The highest regeneration benefits can only be achieved in a location which has both significant levels of multiple deprivation and a sufficient existing visitor profile and market catchment area, to secure success, and the capacity to ensure that success makes a real and measurable impact on deprivation.

I made the point during my opening statement at the Examination in Public (a copy of which is attached for your reference) that whilst London is the only location which is similar to Manchester in terms of a pressing regeneration need, suitable market catchment area and commercial potential, locating a casino in Greenwich would not in itself contribute to the Government's regeneration aims for the Greenwich Peninsula. This area has already benefited from significant levels of public investment, through the Millennium Dome, the Thames Gateway development, the Greenwich Millennium Community and the London 2012 Olympics. The regeneration which is underway in the area should be recognised as a real achievement, to which a regional casino would not provide significant additional benefit for local communities.

Indeed, I refer you to the evidence of Dame Mavis McDonald, then Permanent Secretary of the Office of the Deputy Prime Minister, to the Public Accounts Committee's inquiry into the regeneration of the Millennium Dome and associated land (August 2005). She emphasised that the deal with Meridian Delta Ltd and the Anschutz Entertainment Group as it currently stands, without the inclusion of a regional casino, would achieve the regeneration of not only the Greenwich Peninsula but a wider area. She said: "...I think the long-term benefits to the Peninsula and the east end of the Gateway from the deal we now have has significant potential for regeneration of a much wider area..." (Q42). She went on to clearly state that a casino was in no way essential for this regeneration to be achieved: "The deal is not predicated on there being a casino" (Q89). This point was reiterated by John Walker, Finance and Commercial Director of English Partnerships (Q91) and demonstrates that the regeneration goals for the Greenwich Peninsula can already be achieved through the current plans for the Dome and a regional casino is in no way integral to the regeneration of the area. Importantly, Dame Mavis stated that the transport constraints across the river were such that the density of development as planned in 2005, without a casino, was at its maximum capacity already (Q98). Adding a casino into the Greenwich Peninsula would only serve to increase traffic flows, rendering the development unsustainable and reducing the quality of life for those living and working in the area. I have enclosed a copy of this report for your reference.

As I hope we have demonstrated during the course of our presentations to the Casino Advisory Panel, Manchester offers the best prospect in the UK for a successful pilot of a regional casino can be achieved. Manchester has some of the highest levels of deprivation in the country, yet at the same time the city region has the appropriate visitor profile and catchment area to make the regional casino a commercial success. Manchester City Council is widely recognised as one of the

country's leading authorities and has a proven track record, both in delivering major, complex and high profile capital developments, and in achieving sustainable and effective regeneration for the benefit of deprived communities through effective partnership working. It is with this proven and consistent performance in leadership that we approach the development of a regional casino. We have confidence that we have identified all the relevant factors and partners required to make the casino work as an economic driver for the benefit of the whole of the North West region.

Once again, I thank you for the opportunity to present Manchester City Council's case for a regional casino and I look forward to hearing from you in due course.

Yours sincerely,

Sir Howard Bernstein