



17 Ashfield Road
Blackpool
FY2 0DH

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

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 Newcastle. We believe strongly that the debate concerning the Regional Casino in Newcastle 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 Newcastle.

With that in mind, I have set out in the appended note a brief précis of what we see as the essential flaws in Newcastle'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 Newcastle, 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 INSERT CITY's bid for a Regional Casino licence

NEWCASTLE

Public support: The Council claims that its submission is supported in principle by Council's Executive, LSP, City Centre Partnership, North East Assembly, NG Initiative, One North East, Chamber of Commerce, Universities and GMB Union. However there is no mention of the city's religious communities. Organisations such as the Anglican Church and the Salvation Army have been very vocal in opposing the development. The bid also claims that the Council has consulted widely and sought advice from a broad range of stakeholders. However, it is currently stating its intention to embark on a public consultation, *after* having been short-listed. Because no analysis has been made of the impact of a Super-Casino in Newcastle on existing leisure businesses, it cannot be said that town centre leisure and retail operators support the proposal. In Newcastle it seems likely that a proposal would be close to the city centre and accordingly its adverse impact on existing jobs and investment would be particularly acute.

Experience: The submission claims that because the city already hosts four casinos that this provides them with 'invaluable experience and knowledge'. The truth is that because Category A slot machines have never been available in the UK, no one can claim to have "invaluable experience and knowledge", in dealing with the problems to which they will give rise. On the other hand, there are already four casinos within Newcastle city centre (including "Aspers" which, in terms of floor space, is as big as a regional casino is likely to be), and it is plain that the diversionary impact on consumer spend, jobs and investment will be particularly acute in this location particularly as a regional casino located within or so close to the town centre would directly compete with those and other leisure businesses.

Problem gambling: The Newcastle bid uses closeted language to conceal the fact that since the introduction of new casinos into the city, the number of new referrals to GamCare has increased and may not reflect the true extent of demand. The exact wording in the document is that 'NECA have not observed significant increases in the number of referrals' and the Council later admits that 'the number of referrals is likely to be more a function of the extent to which NECA services are promoted, rather than level of need.' This requires further analysis by the CAP.

Location: The preferred site for the Super-Casino is poorly located between the commercial/retail core of the city and several neighbourhoods with significant levels of unemployment and other deprivation. It is, however, close enough to the city centre to maximize adverse impact on other leisure and retail businesses.

Existing gambling opportunities: The Council acknowledges that it is unclear whether a casino would be a direct substitute for existing gambling products in Newcastle, but that it will

probably add 'some competitive pressure'. Furthermore the Council says it has not conducted a quantitative analysis on the impact of competition from a Super-Casino.

Social Impact and Regeneration: Newcastle remains an area of significant deprivation, in social terms, and a Super-Casino based within or adjacent to the city centre would be likely to attract the very customers who would be most likely to face disproportionate and adverse social impacts. At the same time, Newcastle has enjoyed exceptionally high levels of regeneration in recent years and it is questionable whether the city should be awarded the Super-Casino bid applying this criterion.