

Dudley's not gambling on success - it's a racing certainty!

Dudley Council recognises the community benefits a casino and wider leisure development would bring in successfully linking people and place.

leisure plateau site today

- Poor accessibility and connectivity due to level changes and lack of access across Dudley canal
- Physical separation between Merry Hill Shopping Centre and Brierley Hill High Street
- Lack of economic investment resulting in some of the more deprived areas in the country
- Historically poor perception of the development opportunities for the site
- Lack of high quality cultural and leisure facilities within an important neighbourhood centre
- Lack of a sense of place and distinctiveness

the future

- Integrating Brierley Hill High Street, Merry Hill Shopping Centre and Waterfront Business Park.
- Reinforcing the Black Country Study proposal of designating Brierley Hill / Merry Hill as a new Strategic Centre for Dudley
- Creating employment opportunities
- Improving the urban environment through well designed buildings and high quality public spaces
- Providing a more diverse range of land uses which contributes towards extending activity beyond traditional shopping hours
- Leisure and entertainment destination consisting of casino, cinemas, restaurants, bars, family entertainment centres / activities
- Celebrating and embracing the canal side environment
- Creating a public plaza with strong connections to shopping centre
- Good transport links in terms of bus, metro and car park provision
- Providing development which contributes to a strong urban structure
- Creating a fine grained network of thoroughfares and building connections with the surrounding community



Above advert to appear in Parliamentary Yearbook 2006

**Dudley Council's Response to Casino Advisory Panel Questions
September 2006**

1. INTRODUCTION

- 1.1 Dudley MBC and its partners, most notably the Brierley Hill Regeneration Partnership and Westfield Shoppingtowns Ltd¹, are pleased to submit the following answers to formal questions posed by the Casino Advisory Panel (CAP). To clarify, the Council's preferred location for a large casino would be within the Brierley Hill regeneration area adjacent to the Merry Hill Shopping Centre, Waterfront commercial development and the traditional town centre High Street.
- 1.2 The evidence provided in this response should be viewed alongside Dudley Council's original submission (March 2006)² and further evidence detailing the physical characteristics of the leisure plateau site today and the vision for the future (submitted to the Casino Advisory Panel in August 2006)³. Further, Dudley Council's submission should be viewed in the context of the Black Country Study (Phase One of the Regional Spatial Strategy Revision submitted to the Secretary of State in May 2006) and the cross-local authority commitment to achieving the following sub-regional objectives⁴, namely:
- to stem population loss from the Black Country;
 - to grow income levels to 90% UK average;
 - to improve the socio-economic balance of the population (from 15% A/B households to 22% - current national average);
 - to get 80% Black Country residents into jobs (63,000 more people into employment); and
 - to create a high quality sustainable environment
- 1.3 A key document which should be referred to is the Brierley Hill Implementation Strategy (August 2006 – enclosed). The Strategy is designed to show the physical regeneration of Brierley Hill; incorporating the established High Street, Merry Hill Shopping Centre and the Waterfront office and leisure developments into a fully functioning town centre.
- 1.4 As requested, we outline our response under the criteria headings of social impact, need for regeneration, willingness to licence, probability of implementation, community benefits and unique characteristics.

2. SOCIAL IMPACT

Have you undertaken any further work on the potential social impact of a large or small casino and if so may we have sight of the findings and any policies you have or are developing?

- 2.1 Since our formal submission in March 2006, the Brierley Hill Implementation Strategy (August 2006) has been published and formally adopted. This document

¹ Dudley MBC: www.dudley.gov.uk; Brierley Hill Regeneration Partnership: www.brierleyhill.org; Westfield Shoppingtowns Ltd: <http://www.westfield.com/merryhill/>

² <http://www.culture.gov.uk/cap/proposals/Dudley.pdf> - Original submission to CAP (March 2006)

³ http://www.culture.gov.uk/cap/proposals/additional_submissions/DudleyMBC.pdf - Further evidence submitted to CAP (August 2006)

⁴ <http://www.blackcountryconsortium.co.uk/page.asp?PageRef=49> – Black Country Consortium

sets out an achievable vision for the entire regeneration area outlining a deliverable vision for each 'urban quarter' in terms of type of land use, quantity of floorspace and job generation. The Implementation Strategy has been used to devise a land use capacity scenario which, in present and projected market conditions, is confidently considered to be deliverable.

2.2 The location of a large casino would be at the centre of the regeneration area. The leisure plateau (casino and leisure development) is regarded by all partners as the **physical lynch pin** for the integration of the Merry Hill Shopping Centre, Brierley Hill High Street and Waterfront commercial development.

2.3 A large casino development will be located in the Canal Walk Central Urban Quarter (refer to p.47 of Implementation Strategy). The key objectives for this Urban Quarter are:

- Establishment of a mix of uses that add interest and activity to the canal side;
- Improved public transport access;
- Extension of the high quality development achieved at the Waterfront along the canal corridor;
- Achievement of maximum linkage through the Quarter to connect the core area;
- Creation of new public space and focal points for public activity to reinforce the status of the Urban Quarter at the heart of the centre; and
- Integration of the Midland Metro to provide street level access.

2.4 Partners have invested considerable time and effort into the assembly and preparation of land adjoining the central section of the Canal, in anticipation of development. The site to the west of the Canal (known as Daniel's Land) has been cleared and levelled and a planning application for high density, mixed-use development has been granted planning permission and advance ground works have been completed. The scheme makes provision for a new bridge link across the Canal. The realignment of the Canal and the creation of new development platforms to the east (which will, when developed, allow the level changes to be negotiated and accommodate the new Midland Metro alignment) have also been completed.

2.5 The towpath between Green's Bridge on Level Street and the edge of the Canal South area has been surfaced and lit and a new cycle/pedestrian connection has been created between the towpath and the Embankment Road adjoining Merry Hill. This investment has rectified a long standing deficiency in pedestrian connection between Merry Hill and Waterfront. Comprehensive redevelopment of the Canal Walk Central Quarter could deliver the following quantity and mix of new built development (refer to Figure I below):

Figure I

<i>Land use</i>	<i>Approximate Quantity of Floorspace (m²)</i>	<i>Job Generation</i>
A1 Retail	56,400 (convenience and comparison)	2820
A3/A4 Food and Drink uses	6,500	500
B1 Business uses	10,300	542
C2 Housing	115,300 (approx. 1355 units)	-
D1/D2 Leisure and Recreation uses	24,300	419
		Total Jobs – 4,281

Source: Brierley Hill Implementation Strategy: 47

- 2.6 As part of the delivery of the Implementation Strategy the BHRP, working with the local police, will be undertaking a community safety impact assessment; this would include a casino development. More specifically, a casino development would be subject to a Health Impact Assessment carried out in partnership with the Dudley Primary Care Trust. Both the community safety and health impact assessments would inform future Council and police policies in respect of licensing and managing a large casino as part of a wider leisure plateau development.
- 2.7 As far as the issue of problem gambling is concerned the Council has been made aware, through the Scottish Executive's report 'Research on the Social Impacts of Gambling'⁵ of longitudinal studies from Australia, New Zealand and the U.S. have found that the prevalence of problem gambling has remained stable or declined over time despite the introduction of casinos and other forms of gambling. This has been attributed to the provision of public awareness campaigns and treatment services, as well as processes of adaptation whereby communities adjust to the presence of gambling around them.
- 2.8 The Council will ensure any successful operator has the necessary responsible gaming policies in place to minimise problem gambling. Aspers has adopted the policies developed as part of the development of the Crown casino complex in Melbourne. These policies are widely regarded as the industry benchmark for good practice and would be regarded by the Council as being the minimum requirement.

3. NEED FOR REGENERATION

At paragraph 23.2 you refer to advice from Aspers that the direct employment from a regional casino would be “around 1,000 at opening”. What direct employment should be expected from either a large or a small casino?

- 3.1 The number of full-time equivalent jobs created by a “large” or “small” Aspers casino in Merry Hill will obviously depend on a wide range of factors including, for example, number of tables and gaming machines provided, number and size of restaurants and bars and other ancillary facilities, opening hours and the regulatory

⁵ Scottish Executive Social Research (2006) *Research on the Social Impacts of Gambling: Final Report*. <http://www.scotland.gov.uk/Topics/Research>

and legislative environment in place at the time. However, based on the initial work Aspers has undertaken to date, the following are reasonable estimates for a “large” and “small” Aspers casino at Merry Hill.

- 3.2 Aspers expect that a “large” casino would generate some 300 – 330 full-time equivalent jobs. These could be categorised as follows:

Figure II

<i>Employment Category</i>	<i>Full-time</i>
Gaming (tables and machines)	130-140
Food and Beverages (within the casino demise)	90-100
Other (management, finance, marketing, HR, administration, security etc.)	80-90
Job Generation	300 - 330

Source: Courtesy of Aspers Casinos, September 2006

- 3.3 Aspers anticipate that a “small” casino would generate some 220 – 260 full-time equivalent jobs. These could be categorised as follows:

Figure III

<i>Employment Category</i>	<i>Full-time</i>
Gaming (tables and machines)	100-120
Food and Beverages (within the casino demise)	50-60
Other (management, finance, marketing, HR, administration, security etc.)	70-80
Job Generation	220 - 260

Source: Courtesy of Aspers Casinos, September 2006

- 3.4 The estimates summarised above are based on Aspers experience at “Aspers at the Gate” in Newcastle, where currently there are 218 full-time equivalents to operate a 1968 Act casino of 45,000 sq ft with 22 gaming tables, 150 gaming machines, 1 restaurant and 2 bars.

Also, in paragraph 23.2 you assert a multiplier of from 3.5 to 4.0. What is the evidence for this assertion?

- 3.5 The answer from the previous submission was in relation to a regional casino development and is therefore not now relevant. However, the figures above are based on Aspers experience of its Newcastle operation. The Council is confident these figures will hold true for a large or small casino in Brierley Hill and relate to the direct employment only. The jobs created from the complete development of the leisure plateau are indicated above in the table taken from the Brierley Hill Implementation Strategy. The Council recognise the fact that the catalytic effect of the casino is key to delivering the larger employment numbers and opportunities.

4. WILLINGNESS TO LICENCE

Does this Council equally support a large or a small casino proposal as it did a regional proposal?

- 4.1 Dudley Council at its meeting on 10th April 2006 there was cross party support for the Cabinet’s decision to apply to the Casino Advisory Panel for a regional, large or

small casino development in Brierley Hill. Furthermore there is equal support for a large or small casino proposal from Westfield and BHRP. The Brierley Hill Community Forum is actively engaged in the debate around any casino development. The Forum will also play the principal role in providing information to local communities and undertaking any further consultation. Thus, the mechanisms to continue public engagement are firmly established and respected.

5. PROBABILITY OF IMPLEMENTATION

What success has been achieved in attracting inward leisure investment since the publication of the 2004 West Midlands Visitor Economy Strategy or the 2004 Black Country Visitor Economy Vision (and the 2005/06 draft update)?

5.1 The Black Country Visitor Economy Strategy provides a 10-year vision for the Black Country Visitor Economy. The West Midlands Visitor Economy Strategy provides a vision to 2012. There is no comprehensive dataset which provides inward leisure investment information and therefore it is difficult to establish what investment has been made in the region or the Black Country. However, work undertaken by Heart of England Tourism on behalf of Tourism West Midlands and the Local Authority indicate:

- The hotel and restaurant sector has witnessed a 39% increase in GVA in the region 1997-2000
- Retail rose by 33% (Source ONS⁶)
- It is estimated that 128,588 jobs were created by tourism in 2004. An increase of 4% on 2002 levels after a slight decline in 2003.
- 48% of these jobs are generated in the West Midlands Metropolitan Area. (Source HET)
- Between 2001 and 2005, key attractions within the West Midlands region have invested in excess of £20m in new facilities and attractions.
- Turnover at the key attractions has risen significantly over the same period – between 25%- 40%.
- Serviced/commercial accommodation sector has continued to grow with a 23% rise in bed stock within the region from 2002-2004
- The Black Country generates 7% of business tourism to the West Midlands - £51million during 2004 which is 25% of total visitor expenditure.

⁶ Please note that in this particular context there is no defining category for tourism, however tourism forms an important element of a wide number and variety of industries including those listed.

- 5.2 Economic Impact Assessments have been carried out for the Black Country using the Cambridge Model. Due to the changes in the way in which data has been modelled, Economic Impact Assessments undertaken for both the West Midlands and Black Country Visitor Economy Strategies results are not directly comparable with earlier reports. Therefore, Heart of England Tourism has undertaken a Trends Analysis on the period 2002 to 2004 only.
- 5.3 Information is not available after 2004 as the Economic Impact Assessment uses the 2002 Day Visits Survey - the latest tourism information available. At a regional level, the results are susceptible to a greater margin of potential statistical error and therefore can only be used as approximates.
- 5.4 The volume of visitors to the Black Country rose by 2% in 2003 (from 16.9m to 17.3m) when compared with 2002 however witnessed a slight decrease (1%) in 2004 to 17.1m. This decrease is in line with both national and regional trends.

What further work has been done since the submission on the factors affecting 'probability of implementation'?

- 5.5 In terms of the design and development of the leisure plateau Westfield is currently negotiating with a variety of leisure providers to deliver an integrated leisure plateau that will feature; cinema, bowling alley, family entertainment centre, comedy club, children's adventure centre, ten restaurants and an open-air amphitheatre as part of the public realm development.
- 5.6 The BHRP's service level agreement with the prestigious National Youth Theatre (NYT), which is developing a regional base in Brierley Hill, will encourage usage of such outdoor performance areas and close cooperation with Westfield in making the best use of public spaces in the area.
- 5.7 In terms of future public transport provision since March 2003 the Transport and Works Act approval is in place for the construction of Midland Metro (Wednesbury to Brierley Hill) due to commence in 2008 subject to final Government approval of funding. Westfield has signed an agreement to contribute £36.5m towards the construction, the largest private sector contribution of its type in the UK. A metro stop will be located within the Canal Walk Central Quarter, located centrally between two further primary public spaces (Merry Hill Place and Level Street Square; refer to p. 26 of Implementation Strategy). With additional cross Canal links this stop is well placed to serve new uses fringing the Canal, Merry Hill to the east and Lower Brierley to the west.

6. COMMUNITY BENEFITS

In what way would a large or a small casino provide similar benefits for your area to those sought from a regional casino?

- 6.1 The maximum community benefits are dependent on securing a large casino development. Crucially, this will allow significant physical integration of the site, will support a new hotel and conference development adjacent to the leisure plateau, will support Brierley Hill's role in delivering the Black Country Study's objectives and

be a key element in enhancing Brierley Hill's Strategic Centre retail, tourist, leisure and business offer.

6.2 Similar to a regional casino a large or small casino will deliver the following physical community benefits:

- Physical integration of three isolated sites - Integrating Brierley Hill High Street, Merry Hill Shopping Centre and Waterfront Business Park;
- Creating employment opportunities (refer to Figures II and III above and job generation figures in Implementation Strategy);
- Improve the urban environment through well designed buildings and high quality public spaces;
- Reinforcing the Black Country Study proposal of designating Brierley Hill / Merry Hill as a new Strategic Centre for Dudley;
- Providing a more diverse range of land uses which contributes towards extending activity beyond traditional shopping hours;
- Leisure and entertainment destination consisting of casino, cinemas, restaurants, bars, family entertainment centres / activities;
- Celebrating and embracing the canal side environment;
- Creating a public plaza with strong connections to shopping centre;
- Good transport links in terms of bus, metro and car park provision;
- Provide development which contributes to a strong urban structure; and
- Creating a fine grained network of thoroughfares and building connections with the surrounding community

6.3 The creation of this leisure destination would not only provide additional leisure facilities for the local community but would also be of sufficient size and attractiveness to act as a prominent and iconic leisure destination for the Black Country, attracting visits from the wider sub-region to Brierley Hill town centre and Merry Hill shopping centre.

6.4 If selected, Aspers has agreed to work closely with the community in Brierley Hill and Dudley to maximise the benefits that such a leisure and entertainment facility could provide. The Council and its partners believe the following community benefits would be a **minimum standard** of input from a casino operator⁷. To this end, Aspers have confidently assured the Council it will:

⁷ The Council is currently producing a Supplementary Planning Document (SPD) on Planning Obligations. The key objective of this guidance is to provide clarity to developers, the community and the Council regarding the basis for negotiating Planning Obligations. This document will be monitored as part of the

- Employ from within the local community, whenever possible. It is expected that up to 80% of casino staff would be recruited from within the Brierley Hill regeneration area and the wider Dudley borough (please refer to employment figures in original submission under 'type of area');
 - Have a local procurement policy for suppliers and service providers, including food & beverage and maintenance work;
 - Establish training and development programmes, either on their own or in conjunction with local colleges – discussions have already taken place on the basis of the regional casino development and since the publication of the casino shortlist, discussions are continuing with the four local colleges;
 - Recruit and train long-term unemployed from the local area. When opening its casino in Newcastle, for example, Aspers worked with the local Job Centre and 'Working Links' to identify, train and recruit approximately 60 young people who had either never worked or been unemployed for more than 12 months;
 - Encourage Aspers staff to become actively involved in the local community through, for example, membership of local business and community groups; participation in fundraising activities;
 - Make a financial contribution to the local community, either by way of a one-off capital sum or via an on-going revenue stream for community projects; and
 - Provide ad-hoc sponsorship or financial support for community activities. For example, in Dudley, Aspers already provides financial support to Wordsley secondary school and in Newcastle it sponsors the newsletter for the Chinese community.
- 6.5 The Council has also seen the Responsible Gaming Policy that Aspers follows at its casino development in Newcastle and is derived from the successful policy being run at Crown casino in Melbourne, Australia. Given the success of this approach to problem gambling the Council will insist on such a policy being regarded as the bare minimum by any successful operator.
- 6.6 The Council and its partners strongly believe that the community benefits from a large or small casino development can be delivered **before** the casino or leisure development open through utilising Future Skills Dudley construction training project. Westfield has agreed to stipulate in all construction contracts that contractors and sub-contractors use local labour and trainings resources. This

Annual Monitoring Report (AMR) and its effectiveness will be evaluated. The AMR will inform any review option which may be required during the life of the document. Dudley Council's Local Development Scheme: <http://www.dudley.gov.uk/environment--planning/planning/local-development-framework/local-development-scheme>

approach is strongly linked to Dudley Councils Community Strategy (2005 – 2020) priority of ‘creating a prosperous borough’⁸.

- 6.7 Westfield is also currently in discussions with Halesowen and Walsall colleges regarding training requirements for their new food court proposal for Merry Hill Shopping Centre. This demonstrates their commitment to ensuring local people access the appropriate training to take advantage of the employment opportunities these new developments provide. This approach will be used for the leisure plateau development and is indicative of how partners will deliver the continued regeneration of Brierley Hill.

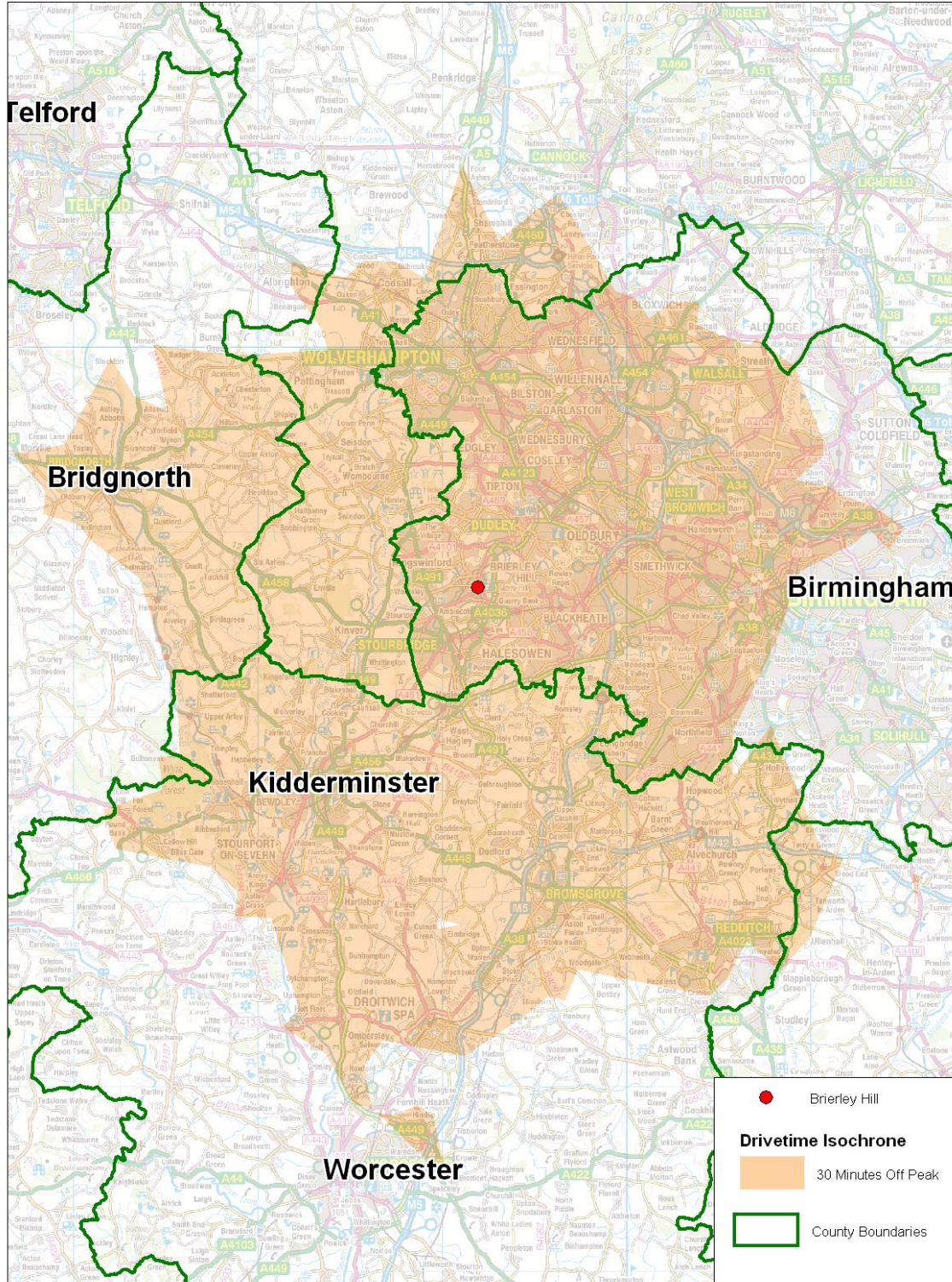
7. UNIQUE CHARACTERISTICS

What could you do that would make your area more uniquely positioned compared with other towns wanting a large or a small casino?

- 7.1 The Council believes that the unique characteristics outlined in its original submission already make Brierley Hill uniquely positioned compared with other towns wanting a large or small casino, namely:
- Brierley Hill is a non-coastal and non-city centre location making it unique when compared with short-listed proposals for large or small casino;
 - The preferred location of a casino is at the centre of the Brierley Hill regeneration area encompassed by one of the UK’s largest shopping centre, a very successful commercial office development and traditional town centre High Street;
 - A large casino development will deliver and attract the necessary ‘critical mass’ to kick-start business tourism;
 - Overall, it has an affluent population to the west and a disadvantaged population to the east within a 30 minute off-peak drive time (refer to isochrone below) making the Brierley Hill offer a unique case study in terms of testing the development of a customer base and how employment opportunities penetrate disadvantaged communities;
 - Strong and vibrant partnership in the area to maximise the benefits of regeneration activities for the local community, Dudley borough and the wider Black Country; and
 - Existing high quality job and construction training initiatives - Jobs Plus and Future Skills Dudley and excellent links with the four local further education establishments within the borough.

⁸ Dudley Community Strategy (2005 – 2021): <http://www.dudleylsp.org/community-strategy>

30 Minute Off Peak Drivetime Isochrone from Brierley Hill



Based on Ordnance Survey mapping with permission of the Controller of HMSO © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Mott MacDonald Licence number 100022121 2006



P:\Birmingham\TB\222553 - PJS Adhoc Jobs\B\01 Dudley Extra Casino Work\Isochrone.wor

8. CONCLUSION

8.1 In conclusion, in assessing Dudley Council's submission for a large or small casino licence the following guiding principles should be taken into consideration by the Casino Advisory Panel:

- A casino development in Brierley Hill would **not be a development in isolation** but would be integral to a planned leisure development consisting of high quality leisure facilities, public spaces and built form; successfully linking people and place.
- Specifically, a large casino has the **undeniable potential of ensuring the delivery of a hotel and conference facility; significantly raising the business tourism offer** of the Black Country sub-region;
- A casino development has the potential to change **an historically poor perception of the development opportunities of a large brownfield site;** and
- Dudley MBC and its partners have the proven ability to **ensure the community benefits and employment opportunities are made a reality during the construction of a casino and throughout its lifetime.**