

# Milton Keynes – Responses to Casino Advisory Panel’s Supplementary Questions

September 2006



## Social Impact

### a. What experience have you had of upskilling programmes?

Milton Keynes has a wealth of experience in developing programmes aimed at increasing the skill level of the local community. This work is guided through the Milton Keynes Economy and Learning Partnership which brings together a range of agencies and organisations from the Public, Voluntary, Community and Private Sectors.

Examples include the range of programmes developed through collaboration between Milton Keynes College, Adult Continuing Education (ACE) and other training providers. Notable success has been achieved in the construction industry (the College has developed a Construction Centre).

Additionally, we have been the Lead Body in several regeneration projects. Each of these has in common a focus on developing the capacity and skills of the area of focus. Several projects developed under both these programmes have won awards celebrating the outcomes achieved and the innovation and creativity in their delivery.

The Area Programme Board in Milton Keynes that seeks to regenerate areas of deprivation in the City has developed a track record of success in delivering skills training in a multi-agency manner. These include programmes aimed at addressing the needs of minority communities in the City.

### b. Why would upskilling for casino employment be any more successful than upskilling for other types of employment?

Milton Keynes Council will seek to ensure that any casino operator seeking a licence in Milton Keynes

work with agencies such as the Milton Keynes Economy and Learning Partnership during the recruitment process to ensure that people have the necessary skills for employment. It is this connection with the Licence award that we believe will give an added and unique momentum to our upskilling programmes locally. In order to maximise the benefits of casino development in Milton Keynes, operators bidding for the licence would be encouraged to make a commitment to recruit the majority of their employees locally and specifically from these deprived areas.

We have been in discussions with a number of potential operators and have made clear our aspirations in this respect and have assisted them in their thinking as to how this may be addressed should Milton Keynes be successful in this application.

Since submission work has begun on developing a policy that includes target groups including the significant group of young men, in particular, who are low skilled and engage in periods of short-term contract employment (largely in the distribution sector), alternated with unemployment.

We have also gained the support of partnerships such as the Area Programme Board and Routes to Success (College and ACE), to encourage recruitment and provide literacy, numeracy and language training as appropriate in liaison with the Casino HR staff.

### c. How can you be confident that benefits arising from casino development would be felt within the pockets of deprivation?

Firstly, through the creation of good quality employment opportunities that will be targeted at the communities living in the 13 Super Output Areas (SOA) in Milton Keynes, which falls within the 20% most, deprived in England. These communities are part of the Milton Keynes Area Programme (referred to above) created by



SEEDA to address acute levels of exclusion, made all the starker by close proximity to relative wealth. The aim is to alleviate the deprivation and realise the potential for residents to join the economic success of their towns and cities. In order to maximise the benefits of casino development in Milton Keynes, operators bidding for the licence would be encouraged to make a commitment to recruit the majority of their employees locally and specifically from these deprived areas.



Secondly, both through Planning and the award of the Licences we will have procedures in place to ensure that the maximum benefits are extracted for the community. For example, through Planning applicants will be required to be mindful of the various Supplementary Guidance and Supplementary Planning Documents that detail, amongst a number of things, the aspirations of Milton Keynes to develop a range of facilities in its areas of deprivation.

Lastly, the style of Milton Keynes is to develop such facilities and programmes through effective partnership working that seeks solutions to issues that arise. The new Casino Operators will be no different in this respect and as, potentially, one of the City's largest employers will we seek to encourage them to play a full part in the community fabric of the City.

### Need for regeneration

- a. The proposal is for a large and a small casino. What are the perceived benefits of having two facilities?

There are a number of benefits we perceive from having two casinos:

- i. **Deliverability** – We have a number of potential sites that will be put forward by a range of developers and operators. These include prime city centre locations including the Theatre District and the present Leisure Plaza (currently subject to a regeneration proposal) as well as established facilities such as Milton Keynes Bowl and the newly developed 30,000 seat UEFA four star Stadium and Arena. Discussions with potential operators has confirmed the appetite for two licences.

- ii. **Contribution to the Growth Agenda** – Milton Keynes has been earmarked by government as the major focus for expansion in the Milton Keynes/South Midlands Growth Area, identified in the Government's Sustainable Communities Plan. This involves substantial population and employment growth. However, the ambitious growth will not take place without meeting the aspirations and expectations that residents and businesses have of major cities. Diversification of Milton Keynes' leisure and recreational offer is a key ingredient to ensure appeal to a broad range of people.
- iii. **Employment and Investment** – We believe that the Casinos will attract 518 gross direct and indirect jobs and produce investment of over £50m in the initial stages and £15m pa in gross GVA.

### Probability of Implementation

- a. Explain how casino development would fit within strategies to develop tourism?

The development of casinos delivers on three key elements of our strategies:

- i. **The development of business and International tourism** - Milton Keynes Council and its partners consider business tourism and its associated infrastructure to be key in supporting economic growth. To develop business tourism successfully and to remain competitive, Milton Keynes must provide a good balance of high quality facilities and services. Work is nearly completed on the development of a conference centre. Three further hotels are in development with five more in the pipeline. Research by the Business Tourism Partnership has found that an important consideration of the business tourism market is the availability of attractions in close proximity and quality entertainment. The provision of casino facilities is considered an important component of the City's leisure offer to business and international tourism.
- ii. **The development of our general visitor market** – In Milton Keynes the leisure / hospitality sector have been able to trade for longer hours than many other towns and cities of a comparable size or indeed larger. This has been due to the key strategic planning of Milton Keynes and the willingness of the various agencies to work together in a pro-active manner, as a consequence the night-time economy is substantial and year on year the number of outlets continues to increase. It has a regional and national destination status for celebratory weekend visits. The development of Casinos in Milton Keynes is seen as important to maintain this momentum.
- iii. **Consolidate and improve our Regional and National profile** – Milton Keynes is seeking to raise its profile across the Region and Nation. It is destined to be one of the top ten cities (in population terms) by the end of our anticipated period of growth. The diversity of the Cultural and Leisure offer is key to that aspiration and Casinos would enable a substantial element of delivery in that respect.

**b. What progress has Destination Milton Keynes made?**

Destination Milton Keynes has made very good and substantial progress since submission. Destination Milton Keynes' main objectives are:

- To provide tourism services for Milton Keynes and the surrounding area, and to market the area to help drive business and leisure tourism to member organisations in a "joined-up" manner
- To be the delivery agency for tourism activities which contribute to the primary objective
- To coordinate and collaborate with all parties who have an interest in increasing the number of visitors to Milton Keynes
- Carry out tourism focused collaborative marketing that is in total alignment with the Milton Keynes Partnership strategy
- To develop sustainable tourism strategies for Milton Keynes

To achieve these objectives, Destination Milton Keynes has

- Established a commission-earning conference desk, providing a free venue-finding service for organisations looking to place meetings, seminars, conferences and training, both residential and non-residential
- Re-introduced a telephone information service
- Introduced a free accommodation-finding facility
- Commissioned a dedicated tourist information website, due for launch in October 2006

All of these services will enable Milton Keynes to deliver opportunities for tourism growth. Additionally, the group is in discussions with Tourism South East regarding membership.

**c. Given that Milton Keynes has been the fastest growing city in England for twenty years why have businesses not developed a full range of leisure facilities to serve that population?**

The previous Gaming Act identified permitted areas for Casinos, being enacted prior to the full development of the city of Milton Keynes. The City was not designated as a permitted area. Consequentially the law has not previously allowed businesses to develop the range of leisure facilities to include casinos. This is and has been a frustration to both the city and potential Leisure developers and operators.

As Milton Keynes approaches its 40th birthday next year Businesses and the Public Sector have developed a wide range of innovative leisure facilities. These have included Milton Keynes Bowl (recently attracting over a third of a million people to the city at the recent Robbie Williams concerts), the new £60m Stadium and Arena that will be home to Milton Keynes Dons Football Club and Milton Keynes Lions Basketball Club, the country's first multiplex cinema (The Point), the country's first real snow ski facility (SnoZone) and Airkix the country's first skydiving simulation facility (both at Xscape). The standard of our sporting facilities is attracting national attention and are the envy of many as we develop

partnerships with a range of Olympic sports some of which are based in Milton Keynes. All of this is in addition to the many informal recreation facilities that exist in our parks and open spaces.

Casinos will develop and extend the Milton Keynes offer in line with our Cultural and many other strategies. The market place has also indicated to us that it will seize this opportunity because of the unique proposition and positioning Milton Keynes offers.



**Regional context**

**a. Have you had specific support for your proposal from the Regional Assembly South East?**

Yes – Please refer to the South East of England Regional Assembly (SEERA) letter from Catriona Riddell (of the of 28 June 2006 attached)- subsequently confirmed by the SEERA Planning Committee on 26 July 2006.

**b. What is the current status of the part of the South East Plan that includes policy TSR4? If it is still in draft, what, if anything, does RPG9 have to say about your proposal?**

SEERA submitted the draft South East Plan (SEP) to the Government on 31 March 2006. Public consultation on the draft SEP ended on 23 June 2006 and an Examination in Public is due to start On 28 November 2006.

Although the draft SEP contains no specific policy guidance on small or large casinos, the key spatial policy considerations for the Assembly are set out in Catriona Riddell's letter of 28 June 2006.

Current Regional Planning Guidance for the South East (RPG9) contains no specific guidance on casinos. However, the Milton Keynes and South Midlands Sub-Regional Strategy, which comprises alterations to parts of RPG for the South East, East of England and East Midlands, states that Milton Keynes should embrace its

growth potential to mature as a major regional centre, particularly through the substantial development of its central area. A large casino in Central Milton Keynes would contribute to the achievement of all those objectives.

- c. Why do you consider that your proposal would “expand the overall tourism market” (TSR4) as opposed to bringing tourists to Milton Keynes from other parts of the country?

The Milton Keynes & South Midlands SRS identifies tourism as one of the sub-region's economic strengths. A large casino and a small casino in Milton Keynes would add to the City's existing leisure and tourism offer and encourage international and domestic tourism, including business tourism.



### Community benefits

- a. Has any further thought been given to the question of achieving community benefits as a result of casino development?

Yes. In discussions with operators we have identified further synergies some of which follow:

- i. The local effects of the casino's marketing policy

Independently of its compliance with the contract with the community, the casino will generally devote a large budget to its own marketing actions, usually highlighting the specific attractions of the town or the region.

Casino operators organise many and varied marketing campaigns, which may include:

- Sponsoring local sports events and individuals. (Particularly important to Milton Keynes in the run-up to the Olympics.
- Organising promotional campaigns (lotteries, competitions, etc.)
- Partnerships with local operators in the tourism sector,
- Advertising campaigns in the media, etc.

Furthermore, if the casino is part of a large group, its marketing actions can be given a national or

even international dimension by integrating them into the marketing policy of the group.

- ii. Food & beverage  
A food & beverage offer is an essential activity in the running of a casino, because it is a fundamental part of the “leisure infrastructure” that the casino aspires to become. It is anticipated that the quality of the offer will provide an up-market dimension to the culinary offer not well developed in the city at present
- iii. Community Fund  
The casino business cannot survive on its own merit. A community fund would not necessarily be a ‘cash’ fund, but a number of activities could be organised to the benefit of the local community, such as the sponsorship of events, the organisation of tournaments for charity and also the organisation of activities in the Casino restaurant where all proceeds may go to a specific charitable organisation. Specific links will be made with Milton Keynes Community Foundation>
- iv. Responsible Gaming  
in order to protect the gambler there will be a strong promotion of a responsible gaming programme. Frontline staff will be expected to be trained on the subject and know how to handle the problem. Links will be made with the appropriate agencies and groups locally which the casino operators will support
- v. Culture  
A casino will add a further dimension to the areas cultural offer. Generally, the casino will play its part in many ways including acting as a venue for and a contributor to a number of public events; during galas and festivals for instance.

### Unique characteristics

- a. What could you do that would make your area more uniquely positioned compared with other similar areas wanting a casino?

The Milton Keynes vision as stated in its Community Strategy is that it is:

#### ***The City that Thinks Differently, Embraces Evolution and Champions Change***

Milton Keynes has been the fastest growing location in the UK over nearly 40 years, due in large part to its locational advantages – half way between London and Birmingham and with excellent transport links via the M1 motorway and the West Coast main railway line. These unique advantages explain why Milton Keynes was chosen as the location for the first multiplex cinema in the UK and the first Xscape centre.

There is absolutely no doubt that Milton Keynes is unique in the United Kingdom both in terms of town planning, infrastructure which with its ‘can do’ attitude provides a powerful combination that ensures innovative delivery. People who come to live in Milton Keynes to make a new life with their families, to start a

new business, enlarge their existing business; all do so because they are met with an approach where every issue has a solution. We have vision and high aspirations, but what we desperately need is the flexibility to make it an even bigger success and to use all the skills of the entrepreneurs, the policy makers and the stakeholders to maximise the advantages of having a casino in Milton Keynes.

We wish to have casinos that are part of an integrated facility where reputation and discreetness is its advertisement. It does not have to be a brash, neon lit edifice constructed on an isolated piece of waste ground down a back street of a run down city such as is the case elsewhere in the UK.

Milton Keynes is a highly planned environment where casinos can be provided in such a way that they need not be close to or impact upon schools, places of worship or any other factor that some individuals may consider to be contrary to good planning.

We are unique in that we have an infrastructure where casinos, both large and small, can easily be accommodated, integrated and operated with minimal, if any, negative impact.

- b. How do you consider that the development of a large or small casino will help reinforce the distinctiveness of the area?

Part of Milton Keynes' distinctiveness derives from its vibrant, "leading edge" leisure offer, including facilities that are found in very few other locations in the UK. Many of those facilities – e.g. SnoZone, Airkix and the Buszy (Skateboard Park) offer a degree of risk and excitement. A large and small casino would complement and reinforce this distinctive aspect of Milton Keynes.

Jane Bransby  
Secretary to Casino Advisory Panel  
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28 June 2006

Dear Jane

**REQUEST FOR FURTHER ADVICE ON SHORT-LISTED CASINO PROPOSALS**

Further to your email to my colleague John Pounder, dated 26 May 2006, I would like to provide further clarification on the spatial policy approach taken towards casino development in the emerging Regional Spatial Strategy for the South East (the draft South East Plan). Please treat this letter as an informal officer level response which is subject to endorsement by the Assembly's Regional Planning Committee on 26 July 2006.

As you know John Pounder wrote to the Panel on 6 January 2006, setting out the content and status of the emerging South East Plan policy (TSR4) in relation to Regional Casinos. Policy TSR4 of the draft South East Plan has been drafted to provide guidance on the location of regional casinos, in accordance with paragraph 14.32 of the adopted alterations to RPG9 in relation to Tourism (as adopted in November 2004).

The draft South East Plan was submitted to Secretary of State on 31 March 2006, and will be the subject of an Independent Examination in Public between November 2006 and March 2007.

In April, the Advisory Panel announced its shortlist of casino proposals in the South East to be subject to further testing through the examination process. These comprise:

Brighton and Hove (large and small)  
Canterbury (large or small)  
Dartford (large)  
Hastings (small or large)  
Milton Keynes (large and small)  
Southampton (large)

Proposals from Southampton and Dartford for regional casinos have not been short-listed.

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Although the emerging RSS contains no specific policy guidance on small or large casinos, the key spatial policy considerations for the Assembly as far these are concerned, would be as follows:

When does a casino become regionally significant?

Policy TSR4 was drafted specifically in relation to regional casinos; however as neither of the two South East local authorities' proposals (Dartford and Southampton) have been short-listed for regional casinos, this raises the wider question of how the proposals for large and small casinos would fit with the emerging RSS.

Policy TSR4 defines regionally significant tourism attractions as those which receive more than 250,000 visitors per annum. However, the supporting text specifically states that the policy applies in particular to regional casinos as defined in the Gambling Act 2005. If a proposal for a small or large casino were part of a larger mixed use attraction, it is likely that it could exceed 250,000 visitors per annum and as such Policy TSR4 would apply. There is also the issue of possible future expansion of a casino, in the light of any future relaxation of the limits placed on the number of regional casinos following the initial pilot phase. This would suggest that those locations identified for large casinos, may need to be considered in terms of their suitability for possible future expansion to regional scale.

Policy TSR4 requires that any proposal for a regionally significant casino should be based upon a sequential approach to site selection, whereby a location is first sought within the sub-regions of Kent Thames Gateway, East Kent and Ashford, Sussex Coast, South Hampshire and the Isle of Wight or the Milton Keynes and Aylesbury Vale growth area. All of the six short-listed proposals in the South East fulfil this criterion.

Please note that since January, the policy wording of TSR4 has changed slightly in accordance with the refined spatial emphasis in the final draft South East Plan as set out in Policy CC9 (the revised wording in TSR4 - highlighted - is attached as an annex to this letter). This revision seeks to bring greater clarity to the geography of inter-regional disparities in the South East.

How do the casino proposals support the spatial strategy for tourism?

Extant RPG9 (as amended November 2004) and the draft South East Plan (Policy TSR7 in both documents) both identify priority areas for tourism development and management and tourism hotspots. All of the casino proposals short-listed by the Panel fall within one of these areas.

Priority Areas for Tourism include, among others, the Thames Gateway, Coastal Belt and the Isle of Wight and the Growth Area of Milton Keynes. The specific policy emphasis provided for each of these areas is summarised below:

- Thames Gateway (Dartford) - RPG9 and the draft Plan emphasise the potential for realising growth in business and attraction based tourism as part of the regeneration strategy for the area adding value to the existing tourism market.

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Coastal Belt (Brighton and Hove, Hastings, Southampton and Canterbury) - identified priorities are to upgrade facilities, promote diversity, reduce seasonality and improve access.

- Growth Areas (Milton Keynes) - to make appropriate provision for tourism, sport and recreation within their context as regional growth areas.
- Tourism Hotspots (Brighton and Hove and Canterbury) - emphasis on managing demand and encouraging longer stays through promotion of linked trips to surrounding areas.

RPG9 and the draft South East Plan (Policy TSR1) also promote the consolidation and upgrade of tourism facilities in coastal resorts in ways which promote higher value activity, reduce seasonality and support urban regeneration. They also encourage resorts to establish a vision and strategy for the future of tourism in their area and its contribution to wider regeneration objectives.

#### Casinos as a town centre use

As leisure uses, casinos are identified as town centre uses in Planning Policy Statement 6 (Planning for Town Centres). The draft South East Plan supports the sequential approach to new development as set out in PPS6, and stipulates (in Policy TC3 'New Development and Redevelopment in Town Centres') that the strategic network of town centres (identified in Section D8 of the Plan) should be the prime focus for large scale leisure development. (Large scale leisure developments are defined as 10,000sqm gross floor space).

As an identified town centre use, even where a casino proposal (on its own or as part of a larger mixed use scheme) does not exceed this threshold, the authority would need to demonstrate that a sequential approach had been taken in selecting the appropriate location (to be in line with Policy TC4 'Creating and Supporting Town Centres').

Please find enclosed a copy of the draft South East Plan for your information. If you require any further clarification do not hesitate to contact my colleague John Pounder.

Yours sincerely

A handwritten signature in black ink that reads "Catharine Riddell". The signature is written in a cursive, flowing style.

**Planning Strategy Director**

## Policy TSR4: Tourism Attractions

Priority should be given to improving the quality of all existing attractions to meet changing consumer demands and high environmental standards in terms of design and access.

### i Local authorities and partners should:

- 1 Encourage the enhancement and upgrade of existing visitor attractions.
- 2 Include policies in development plan documents for determining applications for all new and changes to existing visitor attractions that are likely to have a significant impact locally. In developing such policies local authorities should incorporate the following criteria:
  - Do they help reinforce the distinctiveness of a locality?
  - Are they accessible by public transport?
  - Do they provide wet weather facilities and help extend the season?
  - Will they facilitate regeneration?
  - Are they complementary to existing attractions (or will they displace existing activity)?

ii. New, regionally significant tourism attractions should only be developed where they will expand the overall tourism market and can be easily accessed by public transport. A sequential approach to site identification should be adopted for all new regionally significant attractions (those generating more than 250,000 visitors per annum) unless there are overriding requirements related to that site or sectoral reasons linked to cluster development. A suitable location should be sought:

- Within the sub-regions of Kent Thames Gateway, East Kent and Ashford, Sussex Coast, South Hampshire and the Isle of Wight Special Policy Area, in the coastal belt or the Milton Keynes / Aylesbury Vale Growth Area
- Only where it can be demonstrated that no suitable sites are available in the above areas should other locations be considered.



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