

13<sup>th</sup> August 2012

Cllr Kuldip Sahota  
Leader of the Council  
Telford & Wrekin Council  
Civic Offices  
Telford  
Shropshire  
TF3 4LD

Dear Cllr Sahota

### **Select Committee Report and the Opportunities for Local Authorities**

I am writing to you as Chairman on behalf of the National Casino Industry Forum (NCiF) the body that represents over 90% of UK land based casino operators.

As we know you're aware there is a requirement, under Section 349 of the Gambling Act 2005, for your Authority to publish a Gambling Policy Statement every three years. You will also be aware that the next Policy Statement is due to come into force on 31<sup>st</sup> January 2013.

As the representative body for the casino industry we would welcome the opportunity to contribute to your consultation process.

Casinos play an important part in the provision of entertainment and hospitality, bringing mature and responsible patrons to our town and city centres. Casinos are an attractive and positive addition to the overall offer of our evening economies, without any of the negative experiences of anti-social behaviour sometimes sadly attributable to late night venues. Last year casinos in the UK hosted almost 19 million visits, and provided an important source of local revenue. Which could translate to:

- New £15 million **construction investment** in local authority areas to help to restore confidence locally
- Possibility of Section 106 Agreements to **boost local services**
- Local Authority **business rates boosted** by £250,000 pa
- Areas benefit from **£4-5 million of added value** in the local economy

It is also worth noting that as a, quite properly, highly regulated industry it is also a labour intensive business, providing disproportionately high employment opportunities with typically 100 to 200 staff on a premises, some current casino venues provide up to 450 jobs (depending on the size of the casino). Employment is met at a local level, often to the young; also the lack of academic qualifications is not a barrier to employment.

The number of casino premises licences is fixed in law. Under the Gaming Act 1968 there are 186 licences in existence. The Gambling Act 2005 added 16 new casinos to this number making a total of 202 licences. These 16 '2005 Act' licences are already allocated to specific locations. There is no

move by the government to increase this figure, or by NCiF to move the 2005 Act licences away from the granted area. Nor are our members seeking to increase these finite numbers.

However, there is an anomaly in the current legislation. The 186 '1968 Act' licences were allocated to 53 'Permitted Areas'. These Areas have not changed in the intervening 40 years. However, population and demographic shifts over the last four decades have rendered the operation of a number of these licences uneconomic. At the same time a number of Local Authorities have sought to attract a casino to their area, but are unable to as they are not 'Permitted Areas' under the 1968 Act. The current position is that there are 38 casino licences not being used - dormant. We know of no other business sector where those who wish to operate and those that wish to attract the resultant inward investment are both blocked from doing so by law.

However, on 24<sup>th</sup> July 2012, the Culture, Media and Sport Committee produced a report, entitled '[The Gambling Act 2005: A bet worth taking?](#)'. This Report scrutinised the operation of the Gambling Act 2005. Regarding casinos, it concluded (at Para. 165):

***"Both the 1968 and 2005 Act provisions successfully prevented casinos from proliferating or clustering. However, there is no evidence that allowing local authorities to decide independently whether or not they wish to have a casino would lead to a significant increase in the total number of casinos. We believe that the decision as to whether a casino would be of benefit to a local area should be made by local authorities rather than central diktat.***

***We recommend that any local authority be able to make the decision as to whether or not they want a casino. As a step towards this, we recommend that existing 1968 Act Casino licences are made portable, allowing operators to relocate to any local authority provided that they have the consent of that local authority. The portability of these licences would be constrained by the existing 'triple lock' contained in the Gambling Act: the need to obtain local authority approval, a premises licence and planning permission."***

It is clear that the CMS Committee's view is that Local Authorities are best placed to decide whether they should be a permitted area and do or do not wish to host a casino in their area, rather than remaining with the current position.

We are asking you to consider the proposition that your Authority *is* the proper body (rather than central government) to decide if it wishes to have a casino in its area. We are aware that a small number of Authorities passed a 'No Casino' policy at the last review of its Gambling Policy in 2010. Given the above we would ask you to re-consider that decision. To revoke this policy would not in any way commit that Authority to having a casino – the 'Triple Lock' expressed in the CMS Report extract above still allows an Authority to take individual decisions on applications in accordance with its views and the application's merits. By not having a "No Casino" policy does offer an Authority the continuing opportunity to decide for itself whether it is right for the Authority and its public to have a casino.

We are collating responses from across England, Scotland and Wales and would really appreciate your Authority's views on this local decision-making issue.

Additionally, should your Authority take a positive view that it would, on the freeing up of the position, actively seek to host a casino we would be pleased to hear from you.

Given the timeframe and in order to assist could we ask that you reply to this letter by Friday 31<sup>st</sup> August using the attached 'Licensing Survey' response form, and kindly email your reply to my colleague Jim Ratchford [jim@nci-forum.co.uk](mailto:jim@nci-forum.co.uk).

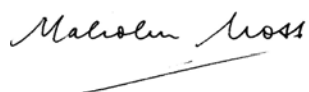
Should you wish to discuss any of the information above please contact my colleague, Jim who will be happy to assist:

Tel: 020 7828 5410  
Fax: 020 7932 0751  
Mobile: 07718 131479

E-mail: [jim@nci-forum.co.uk](mailto:jim@nci-forum.co.uk)

Website [www.nci-forum.co.uk](http://www.nci-forum.co.uk)

Yours sincerely

A handwritten signature in black ink that reads "Malcolm Moss". The signature is written in a cursive style and is positioned above a horizontal line.

**Malcolm Moss**  
**Chairman**

**Copied to: The Chief Executive**

**Encl: 1 Licensing Survey**