



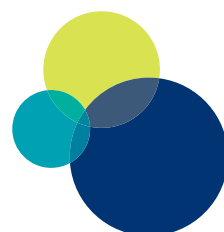
Help – there's a casino coming!

Guidance for churches on
responding to local casino schemes

January 2006

Briefing

evangelical alliance
uniting to change society



Introduction

The Evangelical Alliance, founded in 1846, is the umbrella body that brings together a majority of Britain's 1.39 million Evangelicals. The 1998 English Church Attendance Survey revealed that 35% of Anglicans, 87% of Baptists, 78% of Independents, 35% of Methodists, 93% of New Churches, 93% of Pentecostals, 21% of URC members, 63% of those attending other churches identified themselves as Evangelicals. The Alliance exists to promote unity and truth amongst these churches, individuals and evangelical organisations and to represent their concerns to the wider Church, State and society.

The Evangelical Alliance has taken a keen interest in the gambling debate over recent years – certainly as far back as the Budd report in 2001. We have been contributing positively throughout, giving evidence in person to the Gambling Bill pre-legislative Scrutiny Committee of Lords and MPs on 8th January 2004. Meetings with Tessa Jowell Secretary of State for Culture, Media and Sport took place in February and November 2004, and Minister of State, Lord Mackintosh, in October 2004. We have responded in writing to all Government consultations on this issue.

These brief guidelines are based on direct, local, practical experience of lobbying against casinos. They are designed to offer an insight into how concerned communities can effectively engage in lobbying against casino developments in their neighbourhoods.

Readers should note that these guidance notes reflect a perspective of campaigning experience gained campaigning opposing casino developments in a medium sized town that does not currently have a casino. It will not therefore cover all possible scenarios, although there are obvious issues that are transferable.

Readers should be aware that whilst the views expressed in this booklet are based on views held by the Evangelical Alliance and every effort has been made to ensure accuracy at the time of publication the Evangelical Alliance cannot accept legal liability for the information provided and statements made in this guide.

1. RESPONDING TO LOCAL CASINO SCHEMES

1.1.1 Accentuate the positive

Stress your community credentials by expressing your commitment to the local area; quoting a few specific true examples, e.g., toddler groups, pensioner clubs, homeless work, youth work etc. Bear in mind that churches often do as much, if not more than the local authority can possibly afford itself! Without sounding smug, it may be worth reminding them of this. For instance, how many youth workers do the churches employ, compared with the Council? Who undertakes provision for the homeless – the Council or the churches and Christian organisations (or other religions)?

1.1.2 Anticipate the killjoy objection

People might grumble that Christians are anti-everything etc. Point out that people are entitled to enjoy some hard-won leisure time, but society should not be encouraging something which is addictive or socially harmful.

1.1.3 Avoid 'moral' vocabulary, stress 'social'

Avoid Bible-quoting or mentioning that gambling is sinful/wicked/evil, because no one listens to that and your letters or speeches will either be ignored or quickly lose their impact. We need to persuade by coherent argument and appeal to relevant facts. We must accept that nationally gambling is perceived as a mainstream leisure activity, but we can stress social impact, social concern, community, family and socially responsible gambling.

2. Casino Complexes and Gambling

2.1 Mixed use facilities

Home in on this. It refers to the combination of leisure facilities under one roof that requires very careful examination. Remind the local authority of its duty to look at all the licensing issues in the round e.g., the combination of alcohol and gambling, which experts agree does not encourage responsible, controlled gambling. Also there is much concern over family access to gambling. The Gambling Act states that gambling should be for adults only, and insists that vulnerable persons must be protected. This has been armour-plated into the structure of the new Gambling Commission – which itself is seeking advice on how to define the concept of the vulnerability.

Bear in mind that casino designers focus on enticing people in to the premises and keeping them there as long as possible, maybe without realising how quickly time is passing! In practical terms, this means that communities must be utterly rigorous over the layout of any proposed casino. Could a customer for the non-gambling area e.g. cinema/show/event, conceivably drift into the adult gambling section, or watch it, or be enticed in by cleverly manipulated building design and adverts? Is the casino floor overlooked by a public balcony or terrace? Is the exit from the casino floor easy to find?

The developer may reply that these are matters for the nascent Gambling Commission, not the local authority, which is partly true. You can always stress that as it is your local community at stake, there is no harm and indeed every reason for in making sure. Especially as the plans are largely speculative at this stage!

2.2 Destination gambling

Experts agree that people are more likely to get into trouble if their gambling is unplanned and unstructured. So if I decide to go to a gambling resort, I may have in mind a total spend limit and a fixed time limit; this is **destination gambling**. However, if I pop in to a casino on my way home or drift in while visiting a venue for another purpose, e.g., a show or event, then I am more likely to overspend and run into difficulty; this is **casual or ambient gambling**.

For social reasons we should therefore prefer destination gambling, where people have to make a determined and dedicated trip to gamble. Accordingly, casinos should be in separate locations

away from where people live and work. Any casino in a town centre location, or located close to housing, is an inherently bad idea socially because of those and other reasons.

3. Casino Applications – The Planning Regime

3.1 Planning Policy

Planning traditionally concerns land use and spatial issues. Moral concerns always tend to get ruled out as irrelevant, and planners have years of experience at batting away people who rant! Planning officials are trained to stick rigidly to their remit, and local councillors on planning committees are always wary of making decisions that may be easily overturned at appeal, and thus proving very expensive. However, planning matters comes under the Office of the Deputy Prime Minister whose strapline is *building sustainable communities* and whose policy documents refer to the importance of *social cohesion* and *social well-being*. A key argument is that the social impact of casino location is highly relevant to planning, as it is absolutely a geographical question.

Destination gambling is crucial here. The problem is that the argument for locating casinos away from population centres runs counter to every other current planning policy regarding the environment and transport infrastructure. Planners view casinos as no different from, say, a cinema or sports complex in terms of people movement patterns. Planners never understand the destination gambling argument. But we must try to get it across!

3.2 Impact on Residents

When examining community impact, planners often construe ‘impact on residents’ as only applying to neighbours in the immediate vicinity, e.g. those likely to be adversely affected by noise or traffic. They seem to reject any responsibility to consider the social wellbeing of the wider community who may visit the site. Our difficulty here is that problem gamblers may not necessarily cause disorder around a gambling venue, unlike drinkers. (Although one town did experience a sad case of a tree surgeon with a gambling problem, who attacked the bookie’s counter with his chain saw in a dispute over a £1 bet!) We need to stress our investment in and commitment to the wider community of our area – not just a couple of roads in the immediate vicinity.

3.3 Use Class

In planning, every building is categorised as having a class of use, e.g. residential/retail/industrial, etc. Casinos have always shared the same use class as other leisure venues e.g. cinema: D2 class. Under pressure during the passage of the Gambling Bill, and lobbied hard by those concerned about the social impact of gambling, the Government undertook to take casinos out of D2 class so that the special issues pertaining to casinos could be considered individually i.e. *sui generis* (a type of their own). At the time of writing the Office of the Deputy Prime Minister has still failed to implement this, but is slowly moving in that direction. This technical detail is something you should be aware of, in that it makes it easier to point out the importance of avoiding casual gambling.

3.4 Section 106 Agreements and Regeneration

These are properly known as ‘planning obligations’ (formerly ‘planning gain’). It is a well recognised and almost traditional way for councils to extract money from developers to pay for the infrastructure that the development will require: pavements, roundabouts, drainage etc. It can perversely be viewed as legalised bribery! We are very concerned that inducements from the cash-rich gambling industry may be so generous as to be impossible for local authorities to resist. Experience shows this actuality is not rare. Let us be clear: Gambling companies do not have at heart the regeneration or well-being of any local community, however they might package their proposals. Church communities may be the only people with the freedom to ask pointed questions about this and insist on proper answers.

Whether casinos can ever ‘regenerate’ rundown areas is a very moot point. Experience abroad has been almost entirely negative – but the type of casino abroad may be different: less regulated and more damaging than the British model of gambling. If you are opposing claims of casino-led regeneration, the best issue to home in on might be that of geographical visitor profile. Some research indicates that casinos can only regenerate where it is the tourists who actually gamble. The slot machines are the economic driver of any casino – not the sophisticated gaming tables. Press your developer and council to be specific over where their anticipated market lies. Statistics have shown that in multi-purpose leisure environments, visitors travel in for the glamorous shows/meals/events/sports facilities, but the slot machines, which are the most damaging in terms of addiction, are frequented mostly by local people. So it is the locals who provide the core funding, and their wider community pays the price in the long run. Who is actually going to be sitting at the slots?

4. Casino Applications – The Licensing Regime

Under the Licensing Act 2003, councils, instead of magistrates, have taken on liquor and entertainment licensing. Likewise, when the Gambling Act 2005 is implemented, council licensing committees will be issuing gambling premises licences for casinos.

4.1 Opening hours and capacity

Casinos routinely open around the clock, and they will expect older customers during the day plus night-time trading until 6 a.m. This may have very significant consequences for local residents (all-day traffic, noise, drinkers trying to get in after the pubs have closed etc). We can assume that reputable casinos will cover their own door security, but public disorder in the street and night-time trading is a licensing committee as well as police concern. Examine the crowd capacity of the building too.

4.2 The casino license veto

During the passage of the Gambling Bill, the Government made a significant concession to local communities wishing to avoid having casinos. Local authorities are entitled to write into their licensing policy a veto on issuing casino licences in all or part of their area, ‘having regard to any matter or principle’, on a three-yearly basis. This is a tremendous opportunity for churches and others to make their views known as vigorously as they possibly can. Councils should be made aware that organised Christians and other religious groups churches, being significant bodies of

voters in their areas, have legitimate reservations about the social impact of increased opportunities to gamble, and also could strongly impact electoral outcomes.

Councils are unlikely to pass such a veto unless they have a strong sense that public opinion and local voters support them.

In some areas with local rivalries, if there is a neighbouring local authority in favour of casinos, councils may be unwilling to pass their own veto, because they fear missing out on revenue while picking up the cost of social problems caused by their neighbour's casino. But this is no justification for giving in! You may need to start liaising with other churches outside your area to work more widely to fight casinos regionally.

5. Casino Applications – Planning AND Licensing

5.1 The gap between Planning and Licensing

Planning and licensing involve a long list of regulatory hurdles for any leisure developer to clear. Unfortunately these functions are two entirely separate regimes in law. Councils must ensure that their planning policies and their licensing policies work together in practice, at grass roots level.

Our experience is that the two functions often work against each other, albeit unintentionally, and that canny developers may try to play one off against the other. For example, where planning permission is sought for a perfectly unexceptionable leisure building, which happens to contain a casino element, a *planning* committee may not be sufficiently experienced in examining wider social impact and may find it impossible to refuse consent. Then, having gained planning permission, the developer can put additional pressure on the *licensing* committee to effectively rubber-stamp the necessary entertainment license.

You must insist on the need for joined-up local government here. You can point out to the planning committee the risk of approving a building whose casino element is entirely speculative – if the casino fails, what kind of leisure venue might they end up with instead? Wall-to-wall alcohol?

5.2 Crime and Disorder

This is a police responsibility, and the police will have experience on 'designing out crime' in planning, together with a strong advisory policy on licensing applications. Consult your local police to seek their view. Their prime concern is probably alcohol-related disorder. Experience has shown that the police are only likely to oppose a casino if they believe it is likely to be plying large quantities of alcohol – because gambling in itself has not so far registered on police radar as a major cause of social breakdown.

Likewise, we must not overplay the likelihood of organised crime syndicates running casinos. But it is true that casinos are a very easy place for criminals to launder dirty money. A drug dealer can claim that his suspicious cash was a win at the casinos. So on casino premises, cash can change hands and be laundered that way.

There may also be an issue with what used to be called 'vice' – i.e. explicit sex shows, leading perhaps to something worse! Councils may need your support to avoid licensing such things in a mixed use leisure venue.

The Gambling Commission is the primary body with the task of keeping gambling clean as its major priority. But there is no harm in alerting your local licensing committee to the issues.

6. National Casino Advisory Panel

During the passage of the Gambling Bill, the Government was forced to create a new body to allocate a fixed number of new casino licenses.

If there is no casino in your town at present, then the developer will have to apply for a new casino license to the National Casino Advisory Panel. The Panel is only going to progress applications which can show there will be regenerative benefit to the local area. Leafy shires are unlikely to qualify!

Also, the Panel will only consider proposals from areas where the local authority has made it plain that it is prepared to license casinos in principle, i.e. has not passed a casino veto.

7. Cost to local councils

Talking about costs is really speaking councils' language! Point out that any approval of a casino is highly speculative if there is no existing casino in your area (because of having to wait for the Panel to complete its allocation of new licenses). If a planning committee refuses a planning application, it may have to bear the cost of an appeal. How much cheaper therefore to pass a casino veto from the outset!

If there are casinos already in your town, or planning permission has already been granted, your work is that much harder. The licensing veto is perhaps your best hope, and generating widespread local steam directed at your democratically elected councillors.

8. Some vital biblical dynamics

8.1 Inter-church unity and campaigning

Secure as much assent and co-operation from your fellow churches and congregations as possible. It is always better to speak on behalf of a united grouping. You don't even have to convene a campaign committee, as long as you keep people informed and keep checking that they are happy for you to speak on their behalf. This of course depends on the level of trust and co-operation already present in your area.

You could also seek views and co-operation from other faith groups. A common moral concern about gambling can unite otherwise diverse faith communities and prove extremely constructive, as long as you explain the need to avoid 'moral' vocabulary when speaking to councils. You may even find significant other non faith co belligerents.

BUT bear in mind that in local democracy, one letter on behalf of a united coalition (however large) will only count as one letter! For maximum impact, ideally you need maximum numbers of letters and sheer weight of numbers of people attending or speaking at meetings. Whenever a council decision is coming up, you should ask each of your coalition's member or groups congregations to write their own letter of objection or endorsement of your position. As many

individuals as possible should also write. Petitions and pro-forma letters are relatively weak and they should probably to be used only if absolutely necessary.

There is a balance to be struck between working as delegated campaigners to save church leaders' time, and calling on the troops to write or turn out themselves on the night. This is itself an art and a matter for prayer. Inevitably it involves hard work and staying power as well as good powers of persuasion! Passionate campaigners should be wary of becoming loose cannons – you do need proper dedicated support but if you prayerfully keep the communication and unity good and as professional as possible, you can achieve a lot!

8.2 Prayer and intercession

We often feel we are up against bigger, richer and more powerful entities than ourselves. Try digging into the Old Testament conflict stories and ask your intercessors to set to work. Call upon God for His intervening power. There is no substitute for this. And He answers!

For further help and advice please contact the Evangelical Alliance Public Affairs department at pub-aff@eauk.org or telephone 02072072129.

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