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And also sent by fax

10th August 2006

Dear Ms Curtis

Casino Advisory Panel - Examination In Public (Manchester)

I am writing to you on behalf of AGMA (the Association of Greater Manchester Authorities) to request a seat at the Examination in Public on 7th September 2006. By way of an introduction AGMA was formed after the abolition of the Greater Manchester Council in 1986 and is a partnership between the ten local authorities within the Greater Manchester area. These ten authorities co-operate on a number of issues, both statutory and non-statutory, where there is the possibility of improving service delivery by working together. AGMA also lobbies government departments and responds to government consultation if it is felt that an AGMA response is required.

AGMA recently made representations to the Regional Casinos policy (W8) of Submitted Draft Regional Spatial Strategy for the North West – March 2006.

These representations stated:

“AGMA supports the intention of Policy W8, in that it seeks to promote the development of Regional Casinos within the North West in order to maximise regenerative and other benefits.

However, the identification of the most appropriate location for a regional casino is a process outside of the RSS approval process, being overseen by the Casino Advisory Panel (which is due to report in September 2006). Although the Independent Advisory Panel is to have regard to the Regional Planning Body (as is

noted in paragraph 3.251 of the RSS Technical Appendix), it is not considered appropriate for RSS to pre-empt the available options for future regional casinos within the North West through policy requirements.

Whilst policy W8 importantly highlights the regenerative benefits of regional casinos, and acknowledges the potential benefits to Blackpool, the policy is inappropriately inflexible.

The Casino Advisory Panel may conclude that an alternative site in the north west is the most appropriate location for a regional casino and, in such circumstances, the policy would place an artificial embargo on the implementation of such a permission.

Similarly, as recognised within the technical appendix (page 53), the first regional casino is to be a pilot scheme, and the need for further such casinos might be identified in the future (indeed paragraph 3.262 of the technical appendix describes that around 5 regional casinos is consistent with expectations of what the North West could accommodate). Therefore, should the need for further regional casinos be identified, a number of which being located in the North West, the policy would preclude, for example, regional casinos being developed within Blackpool and Manchester in tandem. This is considered to be an unnecessarily restrictive policy stance which could have the potential to hold back economic growth and regeneration in the northwest.”

The amendments AGMA sought to policy W8 are as follows:

“The important promotion of regional casinos within the northwest should remain within RSS, not least to support the position of the northwest within the selection process. Blackpool, Liverpool and Manchester should remain as priority locations and the very substantial potential benefits for each location should be recognised. The restrictive and highly inflexible nature of the policy in favour of Blackpool should be removed.

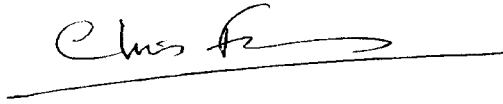
Similarly the wording of paragraphs 8.33, 8.34 and 8.35 of the reasoned justification should be amended in line with this alternative policy position.

Instead, consistent with the guidance in paragraph 1.17 of PPS11, RSS should identify broad locations appropriate for regional casinos (Blackpool, together with the Regional Centres of Manchester and Liverpool as per the priorities identified in the Pion Economics study), supported by a criteria-based policy to facilitate the identification of specific sites through the Local Development Framework/planning application process. Such criteria should consider a scheme’s viability, regeneration and tourism benefits, accessibility and contribution to wider sustainable development principles.”

Given that any licence awarded to Manchester under the current process would be for a regional size casino and AGMA represents local authorities that are neighbours to Manchester, both the harm and benefits will also affect Greater Manchester authorities. It is for this reason alongside the comments it has made to draft

submitted RSS for the Northwest that AGMA requests to be able to make comments directly to the Panel.

Yours sincerely

A handwritten signature in black ink, appearing to read "Chris Findley", is written above a horizontal line.

Chris Findley
Chair of AGMA Planning Officers Group