



Jane Bransby
Secretary to Casino Advisory Panel
Department for Culture, Media and Sport
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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.

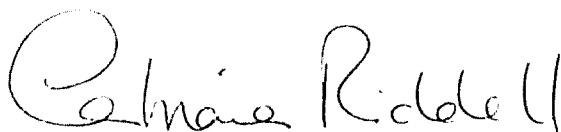
Casinos as a town centre use

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



Catriona Riddell
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.**