



Jane Bransby
Secretary to the Casino Advisory Panel
Department for Culture, Media and Sport
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London SW1Y 5D

06 January 2006

Dear Jane,

Thank you for your letter dated 11 November, and please accept my apologies for the tardy response.

The South East England Regional Assembly as the designated Regional Planning Body for the South East is required by the Gambling Act to advise the Secretary of State on the need for regionally specific planning policy in relation to the development of casinos. Extant Regional Spatial Strategy (RSS) for the South East (RPG9, March 2001 – as amended in November 2004) includes a statement that the Assembly should develop guidance on the location of casinos as part of the review of the RSS (hereafter referred to as the draft South East Plan).

The draft South East Plan (Core Strategy) was submitted to Government Office for the South East in July 2005. The draft includes policy TSR4 which has been rolled forward from RPG9 (November 2004 alterations) but amended to make specific reference to Regional Casinos. The policy and supporting text from the draft Plan are appended for your information. Essentially the draft Plan advocates that the sequential approach, which extant RPG9 applies to all regionally significant tourism attractions, should also apply to Regional Casinos.

The draft South East Plan will be subject to public consultation between April and June 2006, followed by a public examination programmed to commence in November 2006.

I hope this information is helpful. Do not hesitate to contact me directly if you require any further information.

Yours sincerely,

John Pounder
Planning Manager

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Text highlighted in red is proposed amendments to existing RSS9 (as amended November 2004).

5. Tourism Attractions

- 5.1 A visitor attraction is defined by the tourism industry as a *permanently established excursion destination, a primary purpose of which is to allow public access for entertainment, interest or education, rather than being a primary retail outlet or a venue for sporting, theatrical or film performance*¹. Within the South East, further provision of large attractions is unlikely to significantly expand the overall volume of tourism and may have adverse implications for existing attractions. 'Regionally significant' attractions (defined as those attracting at least 250,000 visitors per annum on the basis of their likely traffic impact, given the seasonal nature of demand) should only be encouraged in exceptional circumstances. One such exception is the Thames Gateway – an area with an absence of any major attractions but one for which major population and employment growth is planned with significant improvements in transport accessibility. The overall market for tourism could therefore significantly expand in this area and other growth areas. Development within the Regeneration Areas would also be in accordance with the overall spatial strategy.
- 5.2 For new, regionally significant attractions, the onus will be on developers to demonstrate that they have assessed all potential development locations within the growth areas and the economically underperforming sub-regions as identified in Policy CC9, specifically the Sussex Coast, East Kent and Ashford, Kent Thames Gateway and South Hampshire. Only if it can be demonstrated that a suitable site/location for the attraction cannot be found within these areas should other locations be considered, other than in exceptional circumstances. Exceptional circumstances might include, for example, where the location of a particular attraction is dependent upon the intrinsic physical or built environmental characteristics of a particular site or where attractions are linked to particular local themes or clusters of activity. In this case, local planning authorities should be prepared to consider the possibility of one-off visionary projects (eg the Eden Project in Cornwall). In such cases, a proposal should be treated on its merits, taking account of the potential economic benefits to the area and the region, the impact on the environment locally and more widely and the extent of 'fit' with other plans and policies already in place.
- 5.3 The Gambling Bill 2005 proposed the introduction of three new categories of casino: Small, Large and Regional. An Independent Advisory Panel has been appointed to recommend the areas for the new casinos. In reaching their conclusions the Advisory Panel will be required to identify areas which:
- are willing to license a new casino
 - are in need of economic development and regeneration

¹ 'Action for Attractions', English Tourism Council, 2000

- likely to benefit in regeneration terms from a casino.
- 5.4 In doing so they will be required to take into account regional spatial strategies. The Government will then decide the areas where each of the new casinos may be licensed. Initially, the Bill allows the licensing of only one Regional Casino, to allow the Government to assess the economic and social impacts for a period of three years. Any increase in the number of Regional Casinos licensed is unlikely before 2011.
- 5.5 Government has acknowledged that a Regional Casino would comprise a regionally significant leisure development combining a mix of casino, hotel, restaurants, retail and other leisure uses with the potential to draw visitors and tourists from a wide catchment. Policy TSR4 therefore applies to any proposals for Regional Casinos in the South East. This policy will be subject to review in the light of any increase in the number of Regional Casinos to be licensed.
- 5.6 For all other visitor attractions, local authorities should specify development criteria that seek to enhance the overall visitor experience, allowing for impacts on existing attractions.

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:

- 1 First, within one of the economically underperforming sub-regional strategy areas or in the Kent Thames Gateway, Milton Keynes or Ashford Growth Areas.**
- 2 Second, in areas where it will significantly contribute to the urban renaissance of a coastal resort.**
- 3 Only where it can be demonstrated that no suitable sites are available in the above areas should other locations be considered.**

