

A new sense of place



Responses to questions posed by the Casino Advisory Panel in relation to East Lindsey District Council's proposal for a small casino and leisure complex on the Lincolnshire Coast

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Type of Area

You mention the isolation of the Coastal Action Zone (CAZ) in locational terms. Will you confirm why you feel predominately car based transportation will meet the Casino and visitor, customer needs?

Transport and access are critical issues in East Lindsey affecting residents and visitors alike. The district is characterised by higher than average levels of car ownership and this reflects the area's reliance on car based travel to access services in the country's third largest local authority land area and one of the most sparsely populated areas of the UK. Likewise, the lack of high-volume public transport services into the CAZ also necessitates the use of car transport for external visitors.

A small casino development would have three key travelling groups:

- external visitors;
- resident visitors;
- casino and associated leisure development employees.

All three groups would need (to varying levels) a choice of transport access options to the development.

The current dependence on car travel is addressed in Lincolnshire's 2nd Local Transport Plan which has the key priorities of improved accessibility, supporting the economy and tackling congestion.

The strategy acknowledges that "good transport links are an important part of supporting economic growth, and in particular, the tourism industry, particularly on the East Coast". As the figures in our original submission indicate, the holiday industry on the East Lindsey coast attracts substantial numbers of visitors every year, both day-trippers and those staying overnight. This contributes substantially to the local economy.

Recent infrastructure improvements (local bypasses, road widening etc.) will reduce journey times to the coast, especially at peak holiday times, as well as enhancing the quality of life for residents. They will help support the regeneration of coastal resorts, as well as providing traffic relief for thousands of visitors.

Despite the reliance of the area on car based travel we acknowledge the critical need to develop sustainable (and environmentally sympathetic) public transport access options to the potential casino development. To this end, the following initiatives are of direct relevance:

Rail - The Grantham/Skegness branch line has been selected by the Strategic Rail Authority as one

of six national pilots for trialling its Community Rail Strategy. As part of this strategy, better bus/rail service integration has been achieved in Skegness (InterConnect bus services are now coordinated with train times).

Provision has been made for capital spending on improvements to facilities (Skegness Station and rail stock) & improvements to the the line's interconnectivity with the main east coast line are being developed. It is also important to note that anecdotal evidence (Network Rail) indicates that Grantham-Skegness branch-line footfall has increased over the past year.

Air - In partnership with LCC, we are investigating the potential for the development of tourism/corporate links to the region's two major airports, Humberside & Robin Hood and the use of excursion coaches (as opposed to hire cars) to satisfy on-travel requirements.

Bus - The CAZ is currently served by an existing InterConnect bus service & is also supported by the CallConnect bus service. Both Skegness and Mablethorpe are key CAZ bus transport interchange hubs (linking the local service to wider, countywide services). Both services will provide residents, visitors and employees (to the casino) with local public transport access alternatives. We will also work with developers/operators to establish a quasi 'park and ride' scheme to mitigate against the current bias towards car travel.

Your survey of hotel accommodation points to a shortage of 3 & 4 star facilities. At what stage in the implementation of your Tourism Strategy and investment in the Coastal Action Zone do you expect this shortage to be addressed?

There are some fine but seriously neglected art deco hotels on the East Lindsey coast, of potential 3 & 4 star standard. Market development in the 3 & 4 star sector in Skegness has been led by the successful development of a large, new-build, four-star hotel – Southview Park and the redevelopment of existing stock such as the former Seacroft Hotel – an investment of £1.8 million into phase 1 of the restoration and re-branding as The Royal Renaissance Hotel.

The hotel accommodation associated with the casino will represent a further major step in improving the market, and will lead to a series of new developments and refurbishments, such as the art deco premises mentioned above, in parallel with, and following, the casino development itself.

Continued overleaf

ELDC is committed to improving the quality of the accommodation stock via the Economic Development Strategy theme of enhancing the visitor product and experience. The local authority, with support from Visit Britain, East Midlands Development Agency, East Midlands Tourism and Lincolnshire Tourism have recently established an East Lindsey Accommodation Quality Improvement Programme entitled 'Rosebud'.

The aim is to encourage businesses who are not nationally quality assured to use this programme as a springboard to the National Quality Standards within three years of joining. Businesses participating benefit from ongoing support from the Council and a qualified Accommodation Assessor as well as a range of marketing benefits (as from 2007 ELDC will only promote accommodation establishments that either hold a national quality assurance rating or who are participating in the Rosebud Programme).

ELDC are exploring opportunities for developing the 'natural' aspect of our coastline and conference market (we would anticipate that a small casino development would include conference facilities), and linked to this will be the need for new and high quality tourism facilities, including new places to stay.

In order to facilitate the up-grading of stock ELDC have also worked in partnership with Lincolnshire County Council (LCC) to attract inward investment into the tourism sector (a copy of LCCs 'Lincolnshire Hotel Futures' can be found as an addendum to this report).

Social Impact

What further progress has been made in developing a casino skills course with Lincoln College?

Lincoln College, along with all the training providers serving the Coastal Action Zone have been invited to a seminar on 4th October 2006. The seminar will set out the progress ELDC and partners have made with the bid so far, (including proposed course details, student profile and accreditation bodies), and will emphasise the need for potential operators to be able to access a trained, skilled and appropriately qualified workforce.

Local colleges and providers have indicated that they are eager to provide suitable courses accredited by the gaming industry and in the entertainment, customer care and food and beverage sectors (a copy of a letter of support from First College is included as an appendix (1) to this report).

A positive relationship has also been established with the Learning and Skills Council.

ELDC is building on links already established with Blackpool and Fylde College. It recognises however that the timing of engagement with the training providers needs to reflect the process of granting the licence and determining the preferred operator. It is envisaged that actual training provision would commence in academic year 2007/08 for a casino opening in 2009.

Need for Regeneration

What would be the effect of the absence of a small casino in your Regeneration and Tourism plans?

A small casino and associated leisure development is viewed by ELDC as the central catalyst for the regeneration of the CAZ and development of the coastal tourism product. Acting as the 'strategic hub' for quality/sustainable regeneration/tourism, the casino development would provide focus to all other initiatives & potentially create some 300 permanent jobs in an area characterised by multiple deprivation.

It is given that without this figurehead project, many of the associated benefits a small casino would generate would not be realised & it is important to reiterate the dire circumstances facing the coast. Deprivation is severe and unlike areas with similar or even worse deprivation, there are no alternative regeneration opportunities nearby, and the prospects for attracting new investment are poor. Without the development, the likely result is continuation of the progressive worsening of the coast's overall position.

Although the quantified impact of the casino and associated developments is only some 2% of employment and GVA (per our proposal), its symbolic importance as offering 'a new sense of place' is expected to lead to dynamic effects on a much greater scale, as local and new developers refurbish old facilities and build new ones.

The absence of a small casino as part of ELDCs strategic regeneration/tourism plans and as a 'champion for change' would, given the CAZ's unique circumstances, leave ELDC without a large scale opportunity for sustainable regeneration. Our regeneration/tourism plans would continue to focus around the sustained marketing of our current coastal leisure portfolio, aspirational re-branding activities (e.g. 'the natural coast') and regeneration in the form of less significant revenue and capital projects.

Continued overleaf

Positively, we anticipate on-going local re-investment in existing facilities. The development of the conference market is one of the main focuses for regenerating the CAZ, but to be successful and sustain this market, associated leisure activities have to be offered – a casino would help fill this current void.

In essence, ELDC are developing a concurrent strategy of initiatives to encourage step improvements and re-development of current stock. This strategy positions the small casino development at its strategic core (as the only potential large scale new development) as it offers a clear statement of confidence in the future of the coastal strip and stimulus for further investment.

Probability of Implementation

What further work has been done since the submission on the factors affecting probability of implementation?

Post initial submission we have undertaken a significant amount of preparatory work which ensures we are in an excellent position to deliver a first class small casino development. Key 'internal work' includes:

- A new draft gambling policy – the policy will be taken to Council in November 06;
- Production of 'Planning policy issues paper for a small casino and leisure complex on the Lincolnshire coast – July 2006' (already submitted to the CAP for consideration);
- Confirmation of no structural issues relating to Council owned development sites;
- Re-testing of our casino model to determine its validity as a planning and investment tool.

Key 'external' work includes:

- The hosting of a number of inward investment enquiries from large national and international casino operators/developers;
- The production of a number of contextual/market development documents detailing critical local information (travel time data, visitor number data etc.), site information and specific planning guidelines in order to offer 'clarity of opportunity' to all potential developers.

We are also working in partnership with LCC's Economic Regeneration Department to develop our inward investment approach, marketing materials and market information & have worked with an EMEDA introduced market specialist to develop our understanding of the casino market and its associated nuances.

Our submission continues to enjoy the on-going support of local partners (e.g. Lincolnshire Police & PCT, business community etc.).

What is the recent track record of East Lindsey in attracting inward leisure investment?

East Lindsey has a strong tradition of both public and local leisure investment and re-investment. Recent projects (focussing on the CAZ) include:

Public Investment

The Gibraltar Point Refurbishment



Ref: <http://lincstrust.org.uk/news/index.php>

In January 2006, work began on re-developing the visitor centre and Wash Study Centre at Gibraltar Point National Nature Reserve. The re-development of the visitor centre is being funded by Lincolnshire Enterprise (through the European Regional Development Fund and Single Programme), Lincolnshire County Council, the Landfill Tax Credit Scheme money of Waste Recycling Group Ltd (administered by WREN) and Centrica.

X-Site Extreme Sports Centre (Phase 1)



Twelve different partner organisations have helped fund the £1.8 m (Phase 1) project which offers extreme sports facilities, including; Skegness Town, East Lindsey District, and Lincolnshire County Councils, Lincolnshire Enterprise, East Lindsey Crime & Disorder Partnership, New Opportunities Fund, WREN (Waste Recycling Environmental Ltd) and Sport England's Active England programme. The centre is used as a venue for national qualifying competitions and on completion of 'phase 2' development, will be the only UK facility with both indoor and outdoor facilities on the same site.

East Lindsey District Council has also fully approved a £15.1 million community leisure project and is committed to upgrades on other public leisure facilities in the district.

Local Investment

The CAZ enjoys significant local (private) and inward investment. Some examples of which include:

- Blue Anchor - £25m investment in facilities over the past 10 years;
- Southview – Multi-million pound leisure & conference facility;
- Butlins – Annual investment of £3-4m (£80m over the past eight years);
- Royal Renaissance Hotel - Ongoing refurbishment programme of £2m+;
- Hotel takeovers & re-investment e.g. 3 star Crown Hotel;
- Rand Group have recently purchased 75 acres of land in Skegness to be developed for mixed use (to include leisure).

Inland, talks are progressing with Motorsport Vision Ltd (Cadwell Park) to further develop and up-grade facilities & improve the portfolio of race meetings. In addition, much work has been undertaken to facilitate the development of eco-tourism/farm diversification and associated investment.

International Focus

ELDC is also committed to raising the investment profile of the area. One example of which is the 'Bathing Beauties – International Design competition',

The programme consists of a series of national and international design competitions in which professional artists and architects have been challenged to transform seaside architecture for the 21st Century through the re-design of the iconic British beach hut. The project will culminate in an annual Festival of Bathing Beauties – the UK's First Annual Beach Hut Festival.

To date 240 entries have been accepted from 15 countries around the world.

<http://www.bathingbeauties.org.uk/main.htm>



Have you any further strong evidence from casino operators that would demonstrate probability of implementation?

Since March 2006, interest from the three identified local developers has strengthened – with each developer undertaking further feasibility work on respective sites and commencing discussions with casino operators.

The Council has also experienced significant interest from a number of casino operators. These include:

- Aspers;
- Century Casinos;
- Rank;
- Stanley Leisure;
- Ladbrokes;
- Luminar;
- London Clubs International.

All operators have commented favourably on the professional approach of the Council and partners. They have indicated a desire to undertake further feasibility work – specifically on the identified foreshore sites in Skegness (copies of letters of support from Century, Rank, London Clubs International, Butlins, Aspers and Stanley Leisure are included as an appendix (2) to this report).

The positive operator feedback received to date underlines ELDCs licensing potential, the potential of the mix of sites available, the support for the locality for a sustainable casino/leisure destination and the favourable profile of the area for potential developers.

Most importantly we have developed a strong developmental mix comprising local developers, national operators looking for local development partners and national/international developers/operators.

Regional and Local Context

Whilst the remit of the Panel is to advise only on the broad location of casinos, you have chosen in your proposal to offer a selection of six potential locations for a casino. Only one appears to be in a town centre, which is the preferred location for casinos in PPS6. What is your justification for identifying the others contrary to this policy?

The population distribution of the coast is quite different from that of cities or resorts such as Blackpool or Scarborough. The coast has several small town centres, but also large holiday villages and camp sites which at certain times of the year have a (visitor) population greater than that of some of the towns. We do not feel that the 'preference' - albeit strong - expressed in PPS6 ought automatically to apply to the unusual circumstances of the coast.

Appendix 3 details PPS6 testing for the sites identified in ELDCs initial submission and supplements the earlier submitted 'Planning policy issues paper for a small casino and leisure complex on the Lincolnshire coast – July 2006'.

In respect of the town centre location, do you consider that its accessibility would be such as to encourage problem gambling and attendance by problem gamblers?

The Southern Foreshore site is an ideal location (see image below), meeting PPS6 objectives of stimulating town centre renewal while addressing the DCMS reservation that a town centre location could trigger 'drop-in' gambling from shoppers. The advantages of the site's location with respect to client management combined with its adjacency to the existing retail centre have been recognised by all the casino operators (the site is located within the town centre planning zone, but outside the central retail area). Given that the vast majority of casino visitors will be tourists, the casino will not generate localised problem gambling.



Community Benefits

Since the submission of your proposal has any further thought been given to the potential community benefits?

Our initial submission highlighted the following potential community benefits derived from a small casino development:

- Improvements in local economic, skills development and employment opportunities;
- Extension of the product mix through the provision of new gambling/leisure facilities and an overall improvement in the general quality of the local leisure experience;
- A sustainable 52 week season to alleviate multiple deprivation;
- Potential developer/operator contributions into new/existing community facilities.

We also believe a small casino would ensure:

- The development of an additional, iconic architectural focal point for the district which raises the overall profile of the area;
- Upgrading of the product mix through the provision of higher quality bed-stock;
- Step-improvements in the local street scene (the development of criteria to ensure the selected developer/operator works in partnership with local leisure providers to enhance current facilities/services with an embryonic learn from the casino);
- Improvements in the variety and number of wet weather attractions;
- Improvements to the options and sustainability of the night time economy;
- The provision of support services for other gambling related problems not directly associated with the casino e.g. internet gambling;
- The clustering of facilities to ease access.

We also believe that casino led regeneration will help achieve socio-economic change in the following areas:

- Raising aspirations - among children, parents, young people, communities, businesses, employees and the under-employed;
- Increasing access - both physical access and access to better public and private services;
- Demographics - the need to gain recognition for the unique coastal demographic structure and the challenges this presents to service providers;
- Recruitment - raising the profile of the area and the quality of employment to attract much needed skills and professions to the coastal area;
- Improve the commercial viability of local training providers.

Throughout the application process we have, and continue to, consult directly with local groups to discuss our proposals.

Unique Characteristics

What could you do that would make your area more uniquely positioned vis-à-vis other similar areas wanting a casino?

ELDCs proposal emphasises the unusual characteristics of the coast's problems, and the fact that its isolation and lack of an existing casino makes the area:

- an ideal testbed for casino development;
- a place where a comparatively small development will have a major and 'confined' impact rather than having its impact dissipated across a large population.

The coast has always promoted itself as a family resort. A casino cannot be a destination for families with children, but we aim to integrate it within family holidays, as a place for a one-off big night of entertainment for the adults, rather than there being a narrow focus on gambling, perhaps by solitary individuals. The description of traditional slot machines - 'Amusement with Prizes' - describes the attitude that we hope to engender towards the casino on the part of its visitors, leading to planned 'destination gaming' as opposed to the more habitual or impulse gambling culture associated with city centre casinos.

While re-iterating the significant structural traits which make East Lindsey's coast the ideal test bed for a small casino and, we would also like to confirm that we believe that it is also our approach that defines the ELDC small casino licence application as unique. From project inception, the partners have adopted a focus towards innovation as a driver of project development. We see the licensing process as a further opportunity to innovate and market the coast, and have developed the following framework to complement this ethos:

CAZ – ELDC is leading the way, through the establishment of the Coastal Action Zone (www.coastalactionzone.co.uk), in the development of solutions to counteract the multiple socio-economic challenges faced by UK coastal communities.

The recent Coastal Futures Symposium, hosted in Skegness, was the first of its kind and a workshop session was devoted to discussing the critical role of casino resorts in the regeneration of coastal areas. The symposium endorsed a resolution calling for a preference in favour of traditional seaside resorts in the casino licensing process.

Development Sustainability – ELDC plans to ensure that any development is in context, both architecturally and ecologically, with the local environs, is energy conserving and environmentally sustainable.

The development would be, where possible, required to source environmentally friendly construction materials, minimise adverse impacts on land, water, noise and air quality, and be waste efficient.

Changing the Image – ELDC is currently working with East Midlands Development Agency (EMDA) to re-brand the CAZ's traditional image to become known as an area of emerging markets in the eco and extreme sports niches. This will increase the size of the potential market for a casino related development. Re-branding will change its image from a traditionally 'kiss me quick' working class, summer holiday area to that of a year round destination, upgrading its offer across ages and classes.

If ELDC are granted a licence for a small casino, partners and CAZ members (ELDC, LCC etc.) are already in agreement and on board to take this forward as a catalyst for further regeneration and would like to be one of the first to open.

Best practice - We aim to set-up and host a cross-authority working group to ensure efficiency and consistency in the licensing process, promoting best-practice, defined standards and partnership working, while minimising slippage and process inefficiency.

Bench-marking – The partners are actively researching and benchmarking against 'nearest European neighbours' in order to gain an insight into similar developments that are already operationally established.

Communication – ELDC, in association with Partners, have developed and delivered an evolving, web based information hub (www.lincolnshirecoastalcasino.co.uk). The 'hub' was initially used to improve community access to our licence application. This has been developed to deliver a real-time, 360 degree communication/consultation tool with further development planned.

How do you consider that the development of a small casino will help reinforce the distinctiveness of the area ?

A small casino development will help to revitalise the nostalgia of a traditional seaside destination in a modern setting to appeal to the wider tastes of a new generation. We do not aspire to be a miniature Las Vegas or Blackpool seafront; we are aiming at simple enjoyment within a safe setting. The casino will offer alternative and additional entertainment over and above the existing facilities without destroying the traditional seaside family destination.

Appendix 1 – Letter of support - Training Provider

First College
Heath Road
Skegness Industrial Estate
Skegness
Lincolnshire
PE25 3SY

Tel 01754 767767
Fax 01754 768816
Email enquiries@first-college.fsnet.co.uk



12 September 2006

Mr Peter Bright
Special Initiatives Coordinator
Lincolnshire County Council
Newland
LINCOLN
LN1 1YL

Dear Mr Bright

It is my understanding that there is the possibility of a small casino being considered for the East Coast. I believe the development of a high quality and fully trained workforce will be pivotal to the success of this project

I would advise that First College would be interested in becoming engaged in discussions about the potential to develop courses to support training and employment in relevant occupational areas. I believe there would also be other learning providers who would be interested in engaging in these developments.

I would propose that a meeting be arranged to facilitate further discussion.

I look forward to hearing from you.

Yours sincerely

Sheila M Blackett
Head of Learning / QAM



Appendix 2 – Letters of support – Operators

**CENTURY
CASINOS**



East Lindsey
District Council
Attn.: Mr. Tony Williams
Tedder Hall, Manby Park,
Louth, Lincolnshire
LN11 8UP

Vienna, 19th September 2006

East Lindsey – Lincolnshire Coastal Casino Application

Dear Mr. Williams,

Following our meeting in Skegness, Century Casinos would like to state its further interest in operating a small casino in Skegness, Lincolnshire.

We assume after careful considerations of all possible sites at Skegness that the sites owned by the Council will be the most preferable ones.

This is due to the fact that these locations would serve the need of a casino development best, as they are closely linked to the town centre as well as the seaside. Further, in our opinion this would be the best solution in terms of regeneration benefits for the area.

Nevertheless, we would like to have further talks with the proposed private developers before finalizing our decision making process.

Our decision is based on the Council's positive and professional approach towards a casinos development and we are convinced to experience the same professional attitude in a future casino licensing tender process.

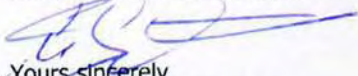
Appendix 2 – Letters of support - Operators

other casino licenses in the UK we have to refrain from delivering commercial details.

Our management team's combined industry experience of more than 50 years, gained in many different gaming jurisdiction our the globe, gives us the ability to tailor gaming-based entertainment operations to the unique cultural needs and circumstances of each specific location and customer group.

Due to our experience, we think that Skegness/East Lindsey would offer an interesting location with a solid tourist customer base and strong local demographics.

In case we can be of further assistance, please do not hesitate to contact us.



Yours sincerely
Niclas Schmiedmaier, LL.M.
Senior Legal Advisor

Appendix 2 – Letters of support - Operators

-----Original Message-----

From: Marion.Smith@eur.cushwake.com
[mailto:Marion.Smith@eur.cushwake.com]On Behalf Of
Michael.Crook@eur.cushwake.com
Sent: 22 September 2006 17:20
To: Tony Williams
Cc: alan_armstrong@rank.com; Chris.Warren@eur.cushwake.com
Subject: EAST LINDSEY - LINCOLNSHIRE COASTAL CASINO APPLICATION

Dear Mr Williams,

Further to your letter of 11th September to my Partner Chris Warren, I write on behalf of Rank Casinos to comment on the three issues which you have raised.

Probability of Implementation

I can confirm that Rank Casinos are very interested in having an opportunity to be represented in your Coastal Action Zone. It is one of a number of locations around the country which they have identified for investigation following the CAP short-listing, and it is a location where Rank consider that a small casino, as part of the leisure attractions of the area, would be successful.

Our clients are aware that a number of possible locations have been identified, and whilst not wishing to express a particular preference at this stage, they think it likely that a small casino linked to established leisure locations, or integrated with other large leisure developments, would be most likely to be successful.

In pursuing opportunities in the Coastal Action Zone, Rank have noted the terms of the Council's submission to the CAP, which they consider gives them confidence to pursue opportunities in the area with a view to pursuing the matter actively if this location is selected by the CAP as one in which a licence for a small casino will be approved.

Community Benefits

Rank Casinos consider that, apart from the direct employment benefits of a small casino in the area, and the indirect "spin off" in other jobs created in the locality, the benefits to the area would be a greater level of recognition, a wider range of facilities, and the potential to extend the visitor season by providing an all-year-round activity linked to existing leisure operations. Rank's view is that, whilst the licensing of a small casino will not, of itself, address or resolve all the issues faced by the area, it will be seen as an important step forward, and a basis for other regenerative measures.

Unique Characteristics

The Coastal Action Zone - Skegness and Mablethorpe. is one of relatively few locations short-listed by the CAP where there is a long standing tradition of leisure activities, but only a relatively short active season. Rank consider that, as mentioned above, the licencing of a small casino, whilst not, of itself, offering a solution to all the issues facing the area, will be seen as an important step along the road to leisure led regeneration.

I hope you find these comments useful for inclusion in your response to the CAP.

Regards

Michael Crook
Partner, Planning & Environment Department
Cushman & Wakefield

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Appendix 2 – Letters of support - Operators



LONDON CLUBS INTERNATIONAL

22nd September 2006

Tony Williams
Director of Corporate Services
East Lindsey District Council
Tedder Hall
Manby Park
Louth
LN11 8UP

Dear Mr Williams

London Clubs International would be extremely grateful if you would accept this letter as an indication of our interest in developing a casino project in East Lindsey's Coastal Action Zone. We think the Zone has considerable potential and a small, appropriately pitched casino could add a missing dimension to the broader leisure offering.

We have looked carefully at your proposal and we think all three sites have unique merit.

We are attracted to the Butlin's site given its strong tourist traffic and excellent associated facilities but equally the site at Fantasy Island grabs our attention and all three sites offer the opportunity of extending both visitation periods and the season on the Lincolnshire coast.

The proposed casinos are very new features for Local Authorities and as a company we have been encouraged by the energy and enthusiasm of the Local Authority and believe that an effective partnership approach would deliver genuine economic regeneration.

Once again, we look forward to competing for a Licence if East Lindsey wins the opportunity to grant one.

Yours sincerely

ROY A C RAMM
Compliance and Security Director



Appendix 2 – Letters of support - Operators

I make the following the following comments on **Community Benefits** and **Unique Characteristics**.

Community Benefits

I think it is important to emphasise the nature and quality of casino employment. Casinos offer a range of jobs and many have an extremely low barrier to entry. Many young people who have struggled in the traditional academic world have found excellent careers in the casino industry. They have received skill sets which have enabled them to travel and to forge very successful careers in the gaming industry. Going forward, with the growth of the casino industry and its broadening into the wider leisure industry, we are aware of a number of educational institutions that are considering offering vocational training qualifications and even degree courses directly relating to the industry.

We also think that the public expectation of the leisure offering in new casinos will mean that restaurants and entertainment facilities will have to be of a much higher standard. We, therefore, expect to be "raising the bar" in terms of service levels and quality. Once again, this means that local people will acquire excellent transferable skills for a life of work.

Casinos also attract people with an interest in sport and certainly, were we to be the operators, we would see the casino as a focal point in sporting activity and would actively encourage participation.

Unique Characteristics

We do not believe that it is commercially desirable or in any way socially acceptable to impose Las Vegas on Lincolnshire. Skegness is a uniquely English seaside town with a long history of traditional family holidays. We believe there is an opportunity to evolve the seaside holiday and the short break into a slightly more sophisticated offering. We have given considerable thought to how, as an operator, we would market Skegness and believe that, in addition to serving the existing tourist population, we would attract wealthier visitors from further afield, including the north Norfolk coast, with intimate and quality entertainment and the promotion of fine local foods, particularly seafood. Ideas we have include a Seafood Festival.

Appendix 2 – Letters of support - Operators

Tony Williams
Director of Corporate Services
ELDC
Tedder Hall
Manby Park
LOUTH
Lincolnshire
LN11 8UP

25th September 2006

Dear Tony

Lincolnshire Coastal Casino – Additional Information

Further to your letter of the 7th September and the request for additional information hopefully the points below will be of use.

- I can confirm that Butlins are still committed to the introduction of a Casino operation on our land and this would be an integral part of an overall investment of £20-25 million pounds. The project would comprise the Casino, a new Entertainment Venue, a 200-bedroom 3/4* Hotel and possibly a nationally operated Bingo Hall. These would be constructed on an area where access could be gained by the general public i.e. you would not have to be a Butlins guest to use the facilities.
The proposed land also has ample space available for car parking.
- We would not be looking to operate the Casino ourselves and discussions are currently ongoing with 3 National /International operators.
- Butlins introduced its first hotel in Bognor Regis in 2005 at a cost of approximately £11 million and we believe the casino will justify a similar project for Skegness, which will further enhance the conference market for the Town and extend the season.
This would generate significant local employment both in the construction phase and the ongoing operation. As you are aware we do have an excellent record re the use of local contractors were possible and using local training establishments e.g. First College and Boston College to develop our team, which we see as key to our future success.
- It is probably worth mentioning that Butlins over the last 8 years has proven its commitment to the area by investing over £80 million into the Resort and see this project as a key part of the next stage of our development.
- We would hope that it would be explained to the CAP, the unique characteristics of the coastal strip and why in this case the placing of the casino in the Town centre is not relevant. Our location is actually in the centre of the main holiday population on this coastal strip, in fact Butlins alone at peak is the equivalent of a small town at around 10,000 people. Our location also lends itself to providing good controls and enables the investment in the Casino and other key parts of the regeneration to be delivered by one investor so ensuring completion of all projects.
It is also worth noting that we are on the main bus route for the coast and with our ample car parking accessibility will not be an issue.

If I can be of any further assistance do not hesitate to contact me.

Yours sincerely

Chris Baron
Resort Director

Appendix 2 – Letters of support - Operators

Tony Williams
Director of Corporate Services
East Lindsey Council
Tedder Hall
Manby Park
Louth
Lincolnshire
LN11 8UP

26 September 2006

Dear Tony

East Lindsey Submission to the Casino Advisory Panel

I am writing in support of East Lindsey Council's submission to the Casino Advisory Panel for a small casino licence in the Coastal Action Zone.

Aspers is a joint venture between Aspinalls and Publishing and Broadcasting Ltd, the leading Australian media, broadcasting and gaming group. The two organisations have many years experience in casinos and the entertainment industry, both in the UK and internationally. We have joined together to develop a new type of upscale "urban destination" casino, combining gaming and other leisure facilities in an integrated entertainment offering, under the "Aspers" brand. In October last year we opened Aspers Newcastle, the success of which has demonstrated the potential market in the UK for these "urban destination" casinos.

As part of our expansion plans, we have investigated the potential of the Coastal Action Zone in East Lindsey for a "small" Aspers casino and entertainment complex. There are some 60,000 residents within the Coastal Action Zone and 240,000 within the 60 minute drivetime catchment of Skegness. Approximately 50% of the residents within this catchment are "Wealthy Achievers" with an additional 28% categorized as "Comfortably Off". This residential market is supplemented by the 6 million tourists who visit the town each year.

As a result of our research, we are particularly interested in the Southern Foreshore in Skegness which is, in our view, a good site for the development of a leisure venue incorporating a small casino and hotel, bars, restaurants and other leisure facilities.

Please do not hesitate to contact me if you require further information from us.

Yours sincerely

Damian Aspinall
Chief Executive

Appendix 2 – Letters of support - Operators

Tony Williams
Director of Corporate Services
East Lindsey Council
Tedder Hall
Manby Park
Louth
Lincolnshire
LN11 8UP

26 September 2006

Dear Tony

Thank you for providing Aspers with the opportunity to assist the Council in preparing their response to the additional questions East Lindsey Council has received from the Casino Advisory Panel.

Our responses to the areas you highlighted in your letter of 11 September 2006 are set out below.

Probability of Implementation

I would be delighted to provide a letter of support outlining our interest in East Lindsey and have prepared one under separate cover.

Community Benefits

The development of a small Aspers casino in Skegness would create a new leisure and entertainment venue for the local community. It would provide an additional form of evening entertainment – one that appeals in particular to the over 30 age group – which complements the current pub and restaurant offering in the town. An Aspers casino and leisure development would also be an important addition to the local tourism industry, which underpins the economy in Skegness and the broader Coastal Action Zone.

We would work closely with the community in Skegness and the Coastal Action Zone to maximise the benefits that such a leisure and entertainment facility could provide. To this end, we would:

- hire from within the local community whenever possible. We would expect that up to 70% of our staff would be recruited from within Skegness' 60 minute drivetime catchment.
- have a local procurement policy for food & beverage suppliers.
- establish training and development programmes, either on our own or in conjunction with local education establishments.
- recruit and train long-term unemployed from the local area. When opening "Aspers at the Gate" in Newcastle, for example, we worked with the Job Centre and Working Links to identify, train and recruit some 60 young people who have either never worked or been unemployed for more than 12 months.

Appendix 2 – Letters of support - Operators

- encourage our staff to become actively involved in the local community through, for example, membership of local business and community groups; participation in fundraising activities.
- make a financial contribution to the local community, either by way of a one-off capital sum or via an on-going revenue stream for community projects.
- provide ad-hoc sponsorship or financial support for community activities. For example, in Newcastle we sponsor the newsletter for the Chinese community and in Dudley we provide financial support to a local school.

Aspers is committed to socially responsible gaming and works with and supports GamCare and the Responsibility in Gaming Trust. This commitment is also evident through Aspers at the Gate and its founding of the Community Action for Responsible Gaming (CARG) programme. CARG Newcastle seeks to constructively address problem gaming issues in society. It is a voluntary, not-for-profit group; a working partnership between local community-based interest groups, designed to facilitate discussion, increase knowledge and reduce the risks of gambling. CARG Newcastle involves a range of organisations, including local churches, the Northumbria Police, the North East Council on Addictions and the Salvation Army, alongside Aspers management and other interested stakeholders.

Aspers is the only casino operator in the UK with a programme such as CARG and we are committed to establishing CARG in every location in which we operate.

Unique Characteristics

In our view, the Council's submission to the Casino Advisory Panel succinctly summarises the unique characteristics of East Lindsey's bid. Clearly tourism is critical to the economic development of the Coastal Action Zone and the importance of providing a competitive tourism offering to maintain, and indeed to grow, the tourism industry in the Coastal Action Zone cannot be underestimated. A small casino, as part of a leisure development, including hotel and meeting facilities, would make a much greater contribution to the local community in Skegness and the Coastal Action Zone with its comparatively small resident and large tourism population than in other locations which are not so reliant on tourism.

I trust that this information assists the Council in preparing its response to the Casino Advisory Panel. Please do not hesitate to contact me if you wish to discuss this information or if I can be of any further assistance.

Yours sincerely

Damian Aspinall
Chief Executive



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26 September 2006

Our Ref SJM/SW

Mr Tony Williams
Director of Corporate Services
East Lindsey District Council
Tedder Hall
Manby Park
Louth
Lincolnshire
LN11 8UP

Re: East Lindsey - Lincolnshire Coastal Casino Application

Dear Mr Williams,

I am writing to provide you with further information in respect of the above application.

1. Probability of Implementation:

I confirm that Stanley Casinos is interested in developing a Small Casino in East Lindsey and we will bid for such a Licence if awarded to the Council. We are very encouraged that six sites have already been identified by the Council as being suitable for casino development and with strong developer and operator interest East Lindsey will be in a position to run an open and very competitive competition to secure the very best facility and benefits for its region.

2. Community Benefits:

Training - Stanley Casinos liaises with the local agencies to recruit staff. We would normally rent space in a prominent pitch in the town centre to recruit in conjunction with the local agencies. Upon appointing staff, a training school is run where croupiers and other staff are trained over a period of weeks. A typical croupier could be trained in say 6-8 weeks. However, competency is only generally achieved after about 16 weeks. This is a serious investment in people on our part.

Local Businesses - our local casinos get involved in local issues and community support through various channels. We often sponsor events and raise money for local charities. I will not expand on this at the moment as I believe we will be able to demonstrate our track record at the competition stage.

The benefit of any monies or value created by a casino licence is really up to the Local Authority to decide and we would not be so presumptuous to suggest where this may be (whether on the arts, theatre, community projects etc). However, you should take advice on the varied mechanisms that any licensing deal could be structure to maximise the benefit to your particular area. This may in the form of a capital contribution, turnover rent, institutional rent or a mixture of the aforesaid.

Appendix 2 – Letters of support - Operators

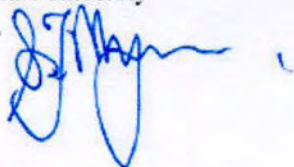
3. Unique Characteristics:

This is a unique opportunity for a casino to be a part of plans to deliver and upgrade much needed leisure facilities to help regenerate the Coastal Action Zone. A casino development in East Lindsey has the unique ability to help regenerate an entire coastal area - not just a town and its immediate surrounds.

Please do not hesitate to contact me if you require any further information.

Regards.

Yours sincerely



S J Myers
Managing Director of Development

Appendix 3 – PPS6 Testing

PPS6 acknowledges casinos as potential town centre uses and this is their preferred location. It is therefore necessary for any casino proposal outside a town centre to satisfy the need and the sequential tests of PPS6. This sequential approach requires that locations are considered in the following order:-

(1) First locations in appropriate existing centres where suitable sites or buildings for conversion are, or are likely to become available, within the development plan document period, taking into account the appropriate scale of development in relation to the role and function of the centre;

(2) Edge of centre locations with preference given to sites that are or will be well connected to the centre – i.e. sites within 300 metres of town centre boundaries.

(3) Out of centre sites with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre.

In considering alternative sites with similar locational characteristics in terms of the sequential approach and having regard to the strategic objectives for the network and hierarchy of town centres set out in the Development Plan Documents, Local Planning Authorities should give weight to those locations that best serve the needs of deprived areas.

Identified Sites

Site 1 – Butlins, Skegness

This site is classed as an out of centre site in PPS6 terms in that it is not in or on the edge of a centre but not outside the urban area. It is located within a large entertainment leisure complex sited between Skegness and Ingoldmells, in what is a continuation of the urban area in between the two settlements. It is some 4 km from the centre of Skegness.

This site was felt to be appropriate because it forms part of a complex where it is possible to accommodate up to 10,000 people and is therefore a settlement in its own right.

There is excellent accessibility to a large population and there is regular public transport to Skegness.

Site 2 – Fantasy Island, Ingoldmells

This site is classed as an out of centre site. It is some 5.3 km from the centre of Skegness. It is located directly adjoining a large entertainment complex and theme park in Ingoldmells; and fairly central in a concentration of some 8,000 caravans. It is part of Ingoldmells although further north than Butlins, and is still a continuation of the urban area extending from Skegness right through to Ingoldmells.

This site was felt to be appropriate because it is part of an urban area which attracts some 3.5 million visitors a year to Fantasy Island plus all the caravan dwellers. Further expansion of the facilities at this site are also planned.

There are again also good communication links with public transport and excellent accessibility to a large population, hence the weight given to this location as indicated in PPS6.

Site 3 – Southview Leisure Park, Skegness

This site is on Burgh Road, Skegness and is classed as an out of centre site in PPS6 terms. It is 0.5 km from the settlement boundary and some 2.5 km from Skegness town centre. It is, however, located at a large holiday complex with some 1,750 holiday vans and 100 touring caravans when an extension is completed, there is also an hotel with some 62 bedrooms. Further expansion of facilities is planned.

There are some 5,500 people on holiday for up to 10 months of the year plus over 100 more in the hotel can be accommodated, therefore, it's almost a settlement in its own right. Again there are excellent public transport links to the town centre.

Site 4 – Southern Foreshore

This site is classed as an edge of centre site because it is within 250 metres of the eastern edge of the Skegness town centre boundary. It is very well connected to the town centre in that there is an established footway linkage along a flat route where pedestrian linkage is reinforced with safe crossing points (compliant with PPS6) across the main road between the site and the town centre.

Site 5 – Northern Foreshore

This site is classed as an out of centre site because it is some 0.9 km from the town centre boundary but it is well within the urban area, being some 1.1 k.m. due north of site 4. It is well connected to the town centre by public transport and currently forms part of a large car park, making the site easily accessible to a large number of visitors both currently and for the future.

Site 6 – Mablethorpe

This site is within the town centre boundary.

Conclusions

- Only one site in Mablethorpe is within the defined town centre.
- There are no suitable sites in Skegness town centre to accommodate the scale and nature of the development proposed.
- All but one of the sites (namely Southview Leisure Park) are within an urban area.
- All sites have excellent existing public transport linkage to centres. In every case a travel plan which would need to explain improved linkage to centres would be needed to accompany a planning application.
- In every case, the sites have easy accessibility to vast numbers of visitors, either by close proximity to centres or visitors to their complex.
- Using the sequential approach to site selection, Site 4 on the Southern Foreshore is the most preferable.
- The Council in determining that all sites are appropriate have taken into account the statement in PPS6 that Local Planning Authorities should give weight to those locations that best serve the needs of deprived areas.



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