

Dartford Borough Council Casino Application

March 2006



**CASINO ADVISORY PANEL
Formal Proposal Cover Sheet**

Please fill in all categories below:

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Dartford Borough Council

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Statement of basis of application:

What exactly are you proposing? Please make clear which type of casino you **primarily** wish to be considered for.

Regional: **Yes**

Large (state number)

Small (state number)

If this proposal is unsuccessful what if any is your fall back/ second proposal?

Large (state number) – **Yes - 1**

Small (state number).

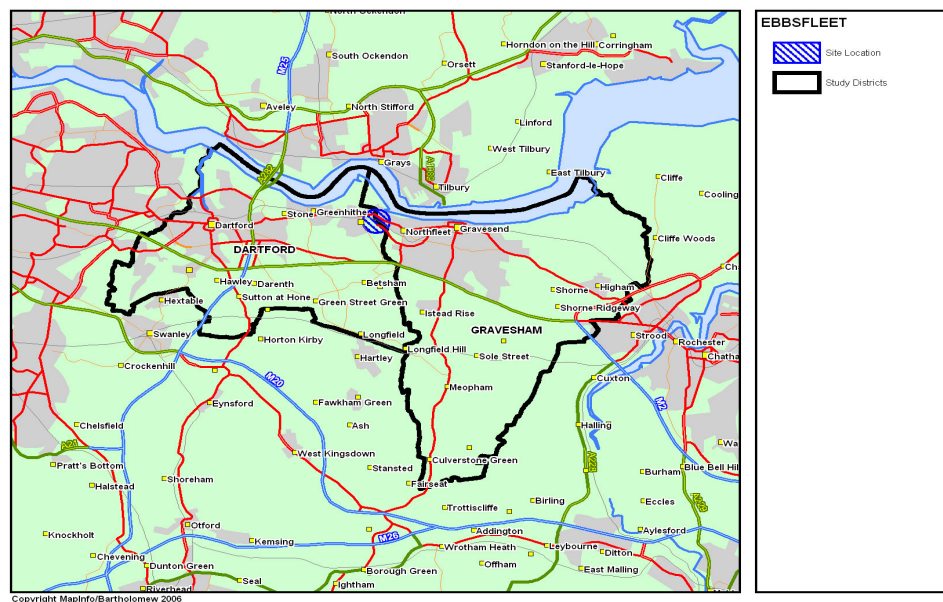
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1 INTRODUCTION

- 1.01 Dartford Borough Council wishes to secure a regional or large casino allocation within the Local Authority area. The preferred site for the proposed casino is Ebbsfleet located to the north east of the borough within the Swanscombe ward. The council, together with landowners are currently in discussions with a number of casino operators to deliver the casino, and this has received overwhelming interest, with more detailed discussions taking place with three operators, which include Gala Group Ltd, Rank Group plc and London Clubs International plc.
- 1.02 The casino scheme has been given outline planning permission and would be part of a wider leisure scheme, contributing to its vitality. It would comprise of:
- a hotel (75, 000 ft² minimum of 150 rooms);
 - conference facilities (up to 100,000 ft²);
 - cultural space (up to 75,000 ft²); and,
 - retail A1/A3/A4 (up to 75,000 ft²).
- 1.03 It would be a leisure hub within a much larger development at Ebbsfleet Valley, including 9,634 residential units and over 8 million ft² of commercial, retail, leisure and community space.
- 1.04 Dartford forms part of the Thames Gateway, one of four growth areas, accommodating significant development over the next 20 years. The Ebbsfleet Valley site (which comprises Ebbsfleet, the proposed location for the casino, together with the Eastern Quarry site) has been identified within national, regional and local policy as one of the key development sites in the Thames Gateway. The overall vision is for an integrated, balanced and mixed-use commercial and residential community set in a high quality landscape. It is centred on a new international passenger station on the Channel Tunnel Rail Link (CTRL). The casino is expected to be a catalyst for the wider development of the site, contributing to its vitality and creating a visitor destination. Figure 1.1 below illustrates the location of the Ebbsfleet site within the borough of Dartford.

Figure 1.1 Location Map



1.05 Dartford would make an ideal location for one of the UK's first casinos pilots. It would be:

- located, within the Thames Gateway, a national priority for growth. The Ebbsfleet Valley site is the 'jewel in the crown' within the Thames Gateway and its development is a key priority. The casino would act as a catalyst to drive the remainder of the Ebbsfleet site forward for development and contribute to the vitality of the overall development;
- part of an exemplar scheme, providing a new mixed use community in a high quality urban landscape. In this way, a casino at Ebbsfleet would provide an excellent model for the development of any future casinos in the UK; and,
- within close proximity to London and the rest of the Europe, with the Channel Tunnel Rail Link (CTRL) located directly opposite the proposed site for the casino. This would ensure that a casino would be easily accessible and contribute to its chances of success.

1.06 Dartford Council are committed to the development of a high quality and successful casino at Ebbsfleet. We have a strong track record in helping to implement major development schemes with Bluewater, a successful retail and leisure destination a prime example of this. The remainder of this document sets out further information in support of the case for Dartford to become the preferred location for a regional or large casino in accordance with the Casino Advisory Panel Guidance¹.

2 TYPE OF AREA

2.01 Dartford lies 25km south east of Central London in Kent between the North Downs and the River Thames. The smallest of the Kent Districts, it covers an area of about 7,000 ha and has a population approaching 86,000. The key characteristics of the population according to the 2001 census are as follows:

- The population in Dartford has increased by 8% since 1991, which is higher than the South East which experienced a 6% growth in its population;
- Dartford and the Swanscombe ward (in which the casino would be located), has a similar profile to regional averages in terms of the ethnicity of the population, with a higher than average proportion of white people, above the national average; and
- The age profile for Dartford is similar to South East and national averages, with 20% aged between 0-14 years; 12% aged between 15-24 years and 30% aged between 40-64 years.

Principal Regeneration Needs

2.02 A key consideration for the Panel is the extent to which a casino could contribute to the regeneration of an area. We consider that a casino at Ebbsfleet could have a significant impact in contributing to its regeneration and the key issues for Dartford and Swanscombe together with how a casino could impact on these are considered below:

- Dartford is a borough of mixed fortunes, with a number of attractive villages and relatively wealthy communities set against a backdrop of **industrial and environmental decline** with a number of huge former industrial sites, which are now derelict. *A key priority of the proposed scheme is to bring forward a major development site, which has been identified as a key national, regional and local priority;*

¹ Casino Advisory Panel, Call for Proposals 31 January 2006

- Dartford is an area of **net out-commuting**, with more people commuting out of the borough to work than into the area. According to the 2001 Census, approximately 37% of the resident 16-74 year olds in Dartford are working outside of the area. *This suggests that there is need to create local employment opportunities to reduce the need for out-commuting;*
- There is a **below average employment rate** for Dartford (78.3% of the working age population compared to 79.1% for the South East) and there are currently 11,000 people economically active but not in employment² that could benefit from new employment opportunities. *This suggests that there is a need for employment opportunities for this section of the population;*
- The **unemployment rate** for Dartford, which is 4.9% is above current levels for the South East (3.7%) and England & Wales (4.7%)³. There are particular issues relating to unemployment for males and the black and black/British population. *There is therefore a need to tackle issues of unemployment, particularly relating to these groups;*
- According to the **claimant count**, there are 152 unemployment claimants in the Swanscombe ward, which equates to 3.9% of the working age population. This level is higher than for Dartford, the South East and England and Wales. The Northfleet North ward (Gravesham), which is opposite Swanscombe and forms part of the Ebbsfleet site has a claimant rate of 5.3%, the highest in Gravesham and Dartford boroughs. *There is a need to tackle the high levels of unemployment in wards surrounding the casino;*
- The local economy of Dartford has been undergoing significant **structural change**. Between 1998 and 2004, employment in manufacturing fell by 50%. This compares to a 138% increase in employment within the distribution, hotels and restaurants sector⁴. *There is therefore a need to ensure that the local population have the skills and capability to access new employment opportunities and to create new opportunities which local people can access;*
- The **occupational structure** for Dartford shows that there is a below average representation in managers and senior officials as well as professional occupations compared to the South East and national averages. There is also a below average representation in admin and secretarial occupations, personal services and elementary occupations⁵. *This indicates a need to create employment opportunities at the higher and lower end of the occupational structure spectrum;*
- There are particular issues relating to **skills and qualifications** within the Swanscombe ward, in which the casino would be located. 35% of the population in Swanscombe has no qualifications compared to 29% for England and Wales. Subsequently, Swanscombe has a very low proportion of the population with higher level qualifications (4/5) compared to the benchmark areas⁶. *This indicates a need to contribute to up-skilling and improved qualification levels;*
- According to the **IMD 2004**, Dartford is ranked 170 out of 354 Local Authorities in terms of the level of deprivation overall. The Ebbsfleet site lies across both the Local Authorities of Dartford and Gravesham and as such, we have also looked at **the IMD 2004** indices for both of these areas. For the IMD overall, 8.3% of all super output areas in Dartford and Gravesham fall within the worst 20% most deprived nationally. Furthermore, 24% of all super output areas in Dartford and Gravesham fall within the worst 20% most deprived nationally for the Education domain and one super output area falls within the worst 1% most deprived. The greatest concentrations of multiple deprivation in the study area, are in the

² Annual Population Survey, April 2004-March 2005

³ Annual Population Survey, April 2004-March 2005

⁴ ABI 1998-2004

⁵ Annual Population Survey 2004

⁶ Census 2001

predominantly urban area to the north west of Gravesham and in pockets across the Northern part of Dartford, within close reach of the proposed site at Ebbsfleet. *There is therefore a need to tackle issues associated with deprivation in Dartford and particularly those relating to education and skills; and.*

- There are slightly higher levels of **crime** in Dartford compared to national benchmarks. Between January and March 2004 for example, there were 29.8 offences per 1,000 population compared to 27.8 for England and Wales. However, for the majority of individual crime indicators, levels of crime in Dartford are below national averages. The key issues are with regards to criminal damage, fraud & burglary and vehicle and other theft⁷. *There is a need to minimise certain types of crime and manage overall levels of crime in the borough, however in relation to the development of a casino this is not considered to be a significant issue would deter its development.*

2.03 Based on a consideration of the needs within Dartford and Swanscombe and in response to a request from the Casino Advisory Panel, we have identified the following characteristics which would make Dartford a good ground for the testing of social impact:

- a key driver behind the creation of casinos is a recognition that they will create significant employment opportunities. Higher than average levels of **unemployment** in Dartford and an above average claimant count in Swanscombe, would allow us to test the impact of the proposed casino in reducing unemployment through creating new job opportunities;
- a key objective of a casino at Ebbsfleet would be to assist with issues associated with increasing **skills and qualification** levels, particularly in the Swanscombe ward as there are low levels of qualifications. We would look to test the casinos impact on raising skills within Dartford and priority areas; and,
- another objective of the casino would be to reduce levels of deprivation in wards closest to the Ebbsfleet site (through employment and other associated benefits). There are high levels of **deprivation** close to the proposed casino site and we would look to monitor whether there is any change as a result of the casino development.

Tourism in Dartford

2.04 Recent studies suggest that there is a gap in current provision of tourism facilities in Dartford and low levels of tourism. However, the next section (Local Plans and Strategies for the Development of Tourism and Leisure) clearly identifies that there is an aspiration to increase tourism in Dartford and Kent as a whole. A casino at Ebbsfleet would help to increase tourism in Dartford and the wider area and this would be a welcome outcome from the development of the scheme.

2.05 A recent study into Tourism in Kent⁸ provides an indication of the level of tourism in Dartford. Around 5 million *staying trips* are made to Kent annually. Of these, only 197,000 or 4% are made to Dartford, which is the lowest figure out of all districts within Kent. Staying visitors contribute over £28.7 million per annum, which represents 6% of the total spend in Kent. This is the second lowest figure for all districts in Kent (after Gravesham). Approximately 88% of all staying trips to Dartford are made by domestic visitors and 12% by overseas visitors (with the latter figure below the Kent average).

2.06 Approximately 39 million *tourism day trips* are made to Kent, representing 89% of all tourism trips. This reflects Kent's appeal as a day trip market and its proximity to London,

⁷ Crime in England and Wales 2003/04

⁸ The Economic Impact of Tourism on Kent in 2003, June 2005 (Tourism South East)

attracting day excursions for holiday makers staying in London and neighbouring counties. Total day trip expenditure is estimated to be somewhere in the region of £1 billion. In Dartford itself, approximately 645,250 day trips are made annually, which represents nearly 2% of the total for the County. In Dartford, this figure results in expenditure of over £14.9 million or over 1% of the total. Again, these figures are significantly below those for all other districts in Kent. Approximately 3% of actual jobs in Dartford are supported by total visitor expenditure.

- 2.07 The figures above do not include visits to retail parks, which in recent years have been considered to play a key role in attracting day visitors to the area. Bluewater themselves estimate that around 8 million visits are made per year by visitors from outside the immediate area, which indicates its significant role in attracting retail tourism.
- 2.08 The Bluewater development is one of the key recent major retail leisure schemes in Dartford and this has been considered to be extremely successful in bringing visitors to the area. There are a number of hotels in the locality, which caters for a range of needs including a Hilton in Dartford and the Premier Travel Inn in Gravesham. Furthermore, a range of hotels are proposed as part of the Ebbsfleet development as well as other leisure uses. Transport access is considered in paragraph 6.14 below and this would be sufficient to meet the increased demands created by a new casino development, particularly with the CTRL and Fastrack developments. However, further transport impact work may be required if a casino licence is awarded. Further information on leisure provision is also provided in paragraphs 6.05 to 6.09 below. Overall, it is considered that the casino could provide a catalyst for the development of tourism and leisure uses in Dartford, which has not been achieved to date.

Local Plans and Strategies for Development of Tourism and Leisure

- 2.09 A casino at Ebbsfleet would make a significant contribution to key objectives outlined within regional, sub-regional and local strategies for the development of leisure and tourism, with the key documents cited below.
- 2.10 The overall vision for tourism in Dartford is set out at a regional level within ‘**Tourism ExSellece, the Strategy for Tourism in the South East (Tourism South East)**. The overall vision is to “*achieve Tourism ExSellece to create a region which: competes with the best; exceeds visitor expectations; invests in product and service quality; fosters profitable tourism businesses; and, welcomes visitors and embraces tourism.*” Sub-regional tourism frameworks have been developed for each of the sub-regions within the South East, one of which covers **Kent and Medway**⁹. The overall vision for this area is to “*establish Kent as a world-renowned centre of excellence for tourism within ten years, where resident and visitor quality and experience expectations are exceeded and businesses can flourish in the long-term.*” A large casino at Ebbsfleet and particularly a regional casino would help to deliver the overall vision by raising the profile of Dartford, Kent and the South East as a tourism destination.
- 2.11 The sub-regional strategy for tourism outlines four key objectives to achieve the overall aim for Kent and Medway, one of which is marketing and branding and a key action is to “raise the profile of Kent in the hearts and minds of Kent’s target markets, thereby enabling customers to actively choose Kent as a leisure destination when planning a short break.” This is particularly relevant as a casino (particularly regional but also large) would help to raise the profile and awareness of the sub-region. Another action is product development and key actions which are relevant to the development of a casino at Ebbsfleet are: increasing financial investment and jobs created in tourism; and, securing

⁹ A sub-regional tourism framework for Kent and Medway (2005-2015)

investment into hotel and leisure projects. A casino at Ebbsfleet would contribute to investment and employment levels in tourism.

- 2.12 Policy TSR7 of the **Draft South East Plan** sets out the priority areas for tourism in the South East. The **Thames Gateway is identified as a particular priority**: “realising the potential for growth in business, sporting, environmental and attraction based tourism as part of the wider regeneration strategy for the Gateway, adding value to the existing tourism market.”
- 2.13 **RPG9a**¹⁰ which covers the Thames Gateway states that: “providing opportunities for leisure and recreation is part of the key to securing the quality of life necessary for successful regeneration. Together with tourism, which currently underperforms in the area, it is an industry with significant prospects for economic growth”. The **Local Plan for Dartford** emphasises the importance of leisure, recreation and tourism. One of its key objectives is to “ensure that a range of visitor attractions are provided within the Borough.” It also points to the economic benefits of developing such uses. The Plan identifies Ebbsfleet as one of only three locations in the borough where future leisure provision will be concentrated. Finally, the Plan makes reference to the fact that Dartford has been identified by the Home Office as being an appropriate location for casinos.
- 2.14 Realising North Kent’s Potential, **North Kent Area Investment Framework (AIF)** sets out a vision that ‘by 2010, North Kent will be the best place to live, work and do business’. It will be a place “*where there is a buzz generated by a cultural life and social scene, day and night and its young student population and heritage make it ‘the place to be’*”. The AIF identifies culture, leisure and tourism as an emerging cluster in North Kent, offering employment opportunities and contributing to the quality of life. It identified the need for a North Kent tourism strategy and investment as a means to enable the strategy to bear fruit such as enabling additional hotel development.
- 2.15 One of the objectives within the **Regeneration Strategy for Dartford** is ‘enhancing Dartford’s leisure offer’. Developing recreational facilities is one way in which they will do this and the Council will support projects which have clear regeneration benefits. Projects which create effective employment opportunities whilst also adhering to other aims of the strategy are likely to be supported. This applies to the proposed casino development. **Towards the Futureplace: A community strategy for Kent Thameside** (Jan 2003) outlines a key action as being to “investigate the potential for locating a key sporting venue or cultural venue of regional significance within Kent Thameside.” It also encourages “the development and vitality of quality businesses serving the leisure, tourism and visitor markets (e.g. restaurants, pubs and clubs) and other quality of life facilities and services to create a ‘thriving local leisure industry’.

3 Social Impact

Social Impact of Proposal

- 3.01 This section provides an analysis of the likely social impacts (both positive and negative) of the proposed casino development at Ebbsfleet. This section also provides an indication of how the positive impacts can be achieved and any negative impacts overcome. The impacts of a large casino are considered to be the same as that for a regional casino, however the scale of impacts is likely to be greater under the regional casino option.
- 3.02 We consider that Dartford would make an ideal location to be a test bed for future casino developments, helping to achieve a number of positive impacts (which are outlined below).

¹⁰ RPG9a: The Thames Gateway Planning Framework (1996)

Furthermore, we recognise that a key consideration would be the extent to which a casino would result in negative impacts (such as increased crime and problem gambling) and we would ensure that these are kept to a minimum through monitoring these and engaging with a responsible casino operator.

Positive Social Impacts

- 3.03 The key **positive social impacts** of a casino at Ebbsfleet are summarised below. These will be achieved by partnering with a responsible casino operator who is signed-up to working towards benefiting the area as a whole. It will also be achieved through working with local initiatives (identified below) which aim to benefit those communities in Dartford in most need.
- 3.04 The casino will help to enable a **major industrial site to be bought forward for development** and thus will contribute to an improved quality of life through an improved environment and provide significant numbers of new jobs and homes for local people.
- 3.05 Significant **employment opportunities** will be provided through the casino development. This would help to reduce unemployment in Dartford and particularly within wards closest to the casino development such as the Swanscombe ward, which has been identified as having high levels of unemployment.
- 3.06 The casino is expected to provide a **wide range of job opportunities**, for example it can provide opportunities for those people who do not want a conventional day job. For some jobs, there is often a low barrier to entry with no formal academic qualifications required (which would be appropriate for communities in Swanscombe ward). This can provide employment opportunities for those people who find it difficult to access employment such as the unemployed.
- 3.07 Through employment at the proposed casino this would also help local people to **learn new skills and gain qualifications**. The casino operators that we have spoken to have indicated that they are committed to training. London Clubs for example has a training manager with a particular remit for developing junior staff. They also support attendance of junior managers on the gaming course held by Salford University and have sent a number of staff to the University of Nevada's gaming management course. The Rank Group create development plans for their staff to ensure that they are able to climb the career ladder, employ dedicated training officers to ensure that development needs are met and are involved in the Government sponsored 'Sector Skills Agreement' with People First which aims to ensure employees have the skills they need to carry out their job. They do operate training schools but also utilise external providers to enhance the overall offer and would look to establish links with a local college to meet local needs.
- 3.08 The casino operators have also indicated that they will provide **well-paid jobs**, which can contribute to increased income levels for local people. London Clubs, for example, have indicated that a croupier with no experience would earn around £17,000 per annum in London and these would be similar for Ebbsfleet.
- 3.09 The employment opportunities, increased skills and raised income levels can also have wider benefits such as **improving the quality of life and decreasing levels of deprivation**. It would also help to decrease welfare payments such as unemployment benefits.
- 3.10 These assumptions are supported by case studies from the US, for example: *National Opinion Research in the US indicated "those communities closest to casinos experienced a*

12% to 17% drop in welfare payments, unemployment rates and unemployment insurance¹¹.”

3.11 There will be **local supply chain opportunities** provided through the development of the casino and fit-out. Furthermore, procurement levels for a large casino are expected to be in the region of £4 million annually. This will provide opportunities for local businesses to benefit (e.g. for restaurant supplies, laundry and floristry) and could contribute to increased business formation as a result of this increased expenditure.

3.12 It is also expected that the casino will **directly lever in other uses** such as a hotel, restaurants and bars that will provide additional investment and employment opportunities, benefiting Dartford and the wider South East. It will build on the overall tourism and leisure offer, building on the town centre regeneration scheme and raising the profile of the borough as a whole.

Negative Social Impacts

3.13 Casinos have sometimes been associated with **negative social impacts** such as problem gambling, crime, noise and environmental issues. However, as a Council we would ensure that this does not happen at Ebbsfleet principally through ensuring that the Casino operator acts responsibly. The potential negative impacts of a casino are considered below together with how they would be overcome.

3.14 Britain has a low level of **problem gambling** compared to other countries (less than 1% of the population) and the Government is committed to maintaining this record¹². We would ensure that this is maintained in Dartford by: ensuring that casino operators recognise that this issue does exist (albeit for a small part of the population) and that they will seek to monitor and minimise this. The existing casino operators that we have spoken to have indicated that they would ensure that literature on problem gambling and how to overcome this is provided in casinos and leaflets are on offer in obvious and discreet places. Casino operators also implement self-barring schemes to ensure that people with serious problems can not access casinos and they provide training for management and senior staff (as a minimum) on detecting problem gambling and what to do about it. Discussions with casino operators have confirmed that this is carried out as standard in existing casino schemes.

3.15 In terms of **crime**, there is strong evidence, which suggests that this is not an issue for casinos. A March 2000 report by the American Gaming Study Commission stated that *“...the majority of the information collected during the past decade indicates that there is no link between gambling, particularly casino style gambling and crime. The security on the premises of gambling facilities, the multiple layers of regulatory control, and the economic and social benefits that gambling seem to offer to communities are effective deterrents to criminal activity¹³.”*

3.16 This is reinforced by evidence in the UK and discussions with casino operators. One of the key aims of the Gambling Commission is to minimise any risks through conducting thorough checks on all gaming staff (including police and criminal records). Casino operators also operate extensive CCTV inside casinos, which deters any criminal conduct; it is also an offence for any venue to become the habitual haunt of prostitutes and criminals; casinos have also been at the forefront of tackling money laundering, operating a voluntary code long before the second and third EU Directives. Casino operators operate strict entrance policies e.g. persons under the age of 18 are not legally permitted to enter a

¹¹ Price Waterhouse Coopers, The New Gaming Environment, Gamble or Sure Bet to Rejuvenate

¹² Casino: Statement of National Policy, Annex A, December 2004

¹³ Public Sector Gaming Study Commission 20000

casino and neither are intoxicated persons. All casinos have contracted security staff on the door and in some sites inside. They encourage local management to establish good relations with the Police. Casino operators follow safe car park schemes, focussing on lighting, CCTV and other crime prevention methods to make car parks and external parts of the building safe for customers and staff.

- 3.17 Any issues concerning **noise** will be kept to a minimum for the following reasons: they have no 'terminal hour' as with nightclubs so the entry and exit is spread over a long period; they attract a wide age range, not just young people as is the case with nightclubs and as such this prevent serious problems arising from noisy clientele. Casino operators have also indicated that they will ensure that the development does not have a negative impact on the local **environment**. Casinos are similar to nightclubs in this respect and would not create any further negative impacts. Extensive environment and noise impact assessment studies are carried out as part of the feasibility and scheme design process for a casino to ensure that any issues are mitigated wherever possible.

Impacts on Social Cohesion and Sustainability of Communities

- 3.18 As outlined above, the casino development at Ebbsfleet is expected to bestow considerable positive impacts that would have a beneficial impact on social cohesion and the sustainability of the local community of Dartford. Clearly, however, there will be a need to ensure no adverse effects on social cohesion arise as a result of any future casino in Ebbsfleet. This is one of the key aims of the Gambling Act 2005 and a new body, the Gambling Commission has been set up to regulate gambling in the public interest.

- 3.19 Whilst there have been no assessments of the impact of existing gambling on problem gambling, social cohesion and the sustainability of communities in Dartford, International experience suggests that the impact on communities has been beneficial. One study identified that casinos in South Africa had *"yielded more than 12 billion rand (£952 million) in new investment, creating more than 30,000 direct jobs and 64,500 indirect new employment opportunities, many for first-time workers. Moreover, urban regeneration has been markedly advanced by substantial investments in public infrastructure and services such as roads, public safety initiatives, two major international convention centres, more than 6,000 new hotel rooms and other much needed tourism development¹⁴."*

- 3.20 A key requirement of the new casinos under the 2005 legislation is to act as pilots and they will determine whether there will be any further provision. The extent of any social impact will therefore be a key consideration, particularly for regional casinos. We would seek to monitor key indicators on employment and unemployment as well as qualification levels. Whilst we do not consider that there would be any negative impacts in Dartford (based on the information outlined above), we would also monitor information on crime and problem gambling to determine what the impact might be. It would be important to distinguish between impacts as a result of the casino development and those occurring for other reasons and this could be carried out for example through surveys.

Key Initiatives and Relationships to Manage Social Impacts

- 3.21 A number of policies have been outlined above (e.g. under problem gambling and crime) which highlight how any negative impacts will be managed and minimised and positive impacts increased. These include, among other policies working with trade unions, providing well-paid jobs, a commitment to recruit locally where possible and minimising problem gambling through the provision of information and training. It is also envisaged

¹⁴ Head to Head on the regeneration Gamble, Regeneration and Renewal, 10 September 2004

that a casino operator would make a financial contribution to CCTV and improved lighting to ensure that any negative impacts are minimised.

3.22 The Council and the casino operator will work with key voluntary and public organisations to support social impact policies and activities, strengthening the social cohesion and sustainability of local communities. The key agencies are listed below:

- **Dartford Community Safety Partnership** *in order to minimise any impacts on crime;*
- **North Kent Chamber of Commerce** *in order to ensure that local businesses benefit from local supply chain opportunities;*
- **Enterprise Agency of North Kent** *in order to ensure that local businesses benefit from local supply chain opportunities and increase business formation;*
- **Groundwork Kent Thameside** *in order to ensure that any negative environmental impacts are minimised and to ensure that the community benefits from the wider scheme;*
- **Job Centre Plus and Employ Kent Thameside** *in order to ensure that local people benefit from local employment and training opportunities;*
- **Urban Thames Gateway Kent Programme** *in order to ensure that local people from the most deprived wards benefit from opportunities arising from the development*
- **Kent Thameside Local Strategic Partnership** *to ensure that the development helps to meet the aims of the local community;*
- **Business in the Community (BIC)** *to encourage businesses to have a greater positive social impact on the local area;*
- **North West Kent CVS and the Community Forum** (which will provide a link between the private and public sector and the CVS) *to ensure that community and voluntary groups benefit from the development; and*
- **Kent Thameside Delivery Board** *to ensure that key bodies associated with the development of the Kent Thameside are engaged in the casino development.*

3.23 Further information about two of the key programmes which would help to maximise the opportunities for a positive social impact are described below.

3.24 The Kent Thameside Delivery Board have developed a local employment initiative and this would be used to assist with training and employment as part of the Ebbsfleet casino. **Employ Kent Thameside** (and Constructing Kent Thameside, a sub-project of this) aims to raise people's employment aspirations, connect them with training opportunities and act as a job broker for the area, matching people with opportunities. This scheme will ensure that local people benefit from training and access to employment opportunities arising from the casino development. There are two key elements to the scheme:

- *Employment Brokerage* – working with agencies such as JobCentre Plus to match local people in Kent Thameside with new job opportunities. The scheme will provide a single point of contact for residents for accessing employment brokerage, situated in high profile places to maximise local recruitment; and,
- *Training Brokerage* – working in partnership with major training providers in the local area together with commissioning agencies such as the LSC and Jobcentre Plus. It works alongside the employment brokerage to ensure that any educational and training needs are met.

3.25 **Employ Kent Thameside** also operate an Employers Protocol which companies in the area can sign up to which means they agree to recruit staff locally and we would look to the casino operator to sign up to this to ensure that local communities benefit. Similarly,

the Swanscombe Community Development Officer (at the Groundwork Trust) is currently working with Blackwells who are a ground-working contractor at Eastern Quarry (Dartford) to help ensure that local people are employed on the site. Blackwells is currently financing local people to put them through national level qualifications and give them administration work experience so that they can begin work on the site as soon as it is developed. This is a prime example of a way in which a Casino at Ebbsfleet could get involved locally.

- 3.26 **Urban Thames Gateway Kent** is a European Funded regeneration initiative bringing around £7.4 million to Kent Thameside between 2002 and 2008. It is focusing on 10 wards within Gravesham and Dartford, which includes Swanscombe, and other wards located close to the proposed casino development. Funding is available to public, private and voluntary/community sector groups across the priority themes of achieving social inclusion, developing community access to learning and improving business infrastructure and regeneration. Our discussions, have indicated that the Ebbsfleet casino would make a significant contribution to these priority areas. It would therefore be possible for the casino to link in with existing projects, or there could be potential for new projects to be developed, which would assist with for example training programmes or developing local supply chain opportunities.

4 NEED FOR REGENERATION

- 4.01 The key regeneration needs for Dartford and Swanscombe are summarised in paragraph 2.02 above. This includes supporting information on regeneration and employment status and activity rates in the area. It identifies the issues with regards to higher than average unemployment rates in Dartford and the Swanscombe ward. This section considers the extent of the impact in terms of employment and contribution to Gross Value Added (GVA) in order to demonstrate the level of contribution, which a casino at Ebbsfleet would make to Dartford.

Economic Impact Assessment

- 4.02 Here, we consider the impact of both a large and regional sized Casino at Ebbsfleet in Dartford. The size range and scale of these are indicated below:

- Large = 50,000-75,000 sq ft
- Regional = 100,000-150,000 sq ft

Consideration of Regeneration Potential in Terms of Job Creation

- 4.03 Table 4.1 below looks at the additionality in terms of full-time equivalent (FTE) jobs for the range of casino sizes indicated above. Additionality looks at the extent to which activity is undertaken on a larger scale, takes place at all, or earlier, or within a given geographical area as a result of the project. The analysis only considers the permanent impact of the casino in terms of jobs created in North Kent Thameside. Temporary employment will be created during the construction phase of the project, but at this stage we do not have sufficient information to calculate the effects. However, we do believe that many temporary jobs will go to local residents.
- 4.04 Key assumptions are described below and these are based on a report undertaken by DTZ in May 2005, which assessed the economic impact of a casino scheme in relation to the overall scheme at Ebbsfleet. These have updated on the basis of further research in to the impacts of Casino development as well as through use of standard English Partnerships (EP) Guidance which is generally used in the submission of applications for recreational and leisure development. Key assumptions are outlined below:

- **Direct employment:** For the purposes of calculating employment impacts, we have assumed a density ratio (*net floorspace per employee*) of 430 sq ft per worker;
- **Deadweight:** This refers to the output that would have occurred without the project. We have assumed zero deadweight since there would be no provision of a casino in Dartford without the associated license;
- **Leakage:** This refers to the proportion of outputs that benefit those outside of the Casino’s target area or group. This has been estimated as Low – (10%) – with the majority of benefits going to people living within the local area. This is on the basis of the range of employment opportunities that will be on offer at the Casino compared to the rest of the Ebbsfleet scheme and the likely linkages that can be established with local employment initiatives such as the Employ Kent Thameside initiative and the Urban Programme;
- **Displacement:** this is defined as the proportion of project outputs/outcomes accounted for by deduced outputs/outcomes elsewhere in the target area. According to the DTZ 2005 report “as a considerable new residential and employee population will be introduced into the site, potential displacement effects, in terms of retail and leisure would be offset by the growing local population. In addition, there is very little in the way of leisure activity provision of this nature in the area and as such the existing leisure facilities are likely to capture a different market to the casino users. This has been assumed as “low” (25%); and,
- **Multiplier effect:** this is further economic activity (jobs, expenditure or income) associated with additional local income, local supplier purchases and longer term effects. According to EP guidelines we have adopted a composite multiplier of 1.38 which suggests average supply and income linkages apply.

Table 4.1: Additionality of Casino size options in North Kent Thameside in terms of FTEs

	Large		Regional	
	50,000 (min)	75,000 (max)	100,000 (min)	150,000 (max)
Direct employment A/B				
A – Gross Internal floorspace	50,000	75,000	100,000	150,000
B – Employment Density Assumption	430 sq ft per worker	430 sq ft per worker	430 sq ft per worker	430 sq ft per worker
C – Gross Direct Jobs	116	174	232	348
Leakage C E				
D – Leakage Assumptions	10%	10%	10%	10%
E – Estimated Leakage	11.6	17.4	23.2	34.8
F – Gross Local Direct Effects	104.4	156.6	208.8	313.2
Displacement F H				
G – Displacement Assumption	25%	25%	25%	25%
H - Displacement	26.1	39.2	52.2	78.3
I – Net Local Direct Effects	78.3	117.4	156.6	234.9
Multiplier Effect I+K				
J – Multiplier Assumption	1.38	1.38	1.38	1.38
K – Multiplier Effect	29.7	44.6	59.4	89.1
L – Total Net Local Effects	108	162	216	324
Overall Additionality				
FTEs	108	162	216	324

4.05 It can be seen from the table above that the overall additionality impacts range from 108 FTEs (minimum size for a large casino) to 324 FTE's (maximum size for a regional casino).

Valuing the Economic Impact

4.06 In addition to estimating the economic impact of the various casino options in terms of job creation, we have also sought to estimate the impact in monetary terms. We have used Gross Value Added (GVA) per employee for the recreational industries based on data provided by the Annual Business Inquiry 2003. This indicates that at the Kent CC level the GVA per employee for the recreational industries is £21,516 (we have calculated this based on the GVA for the recreational sector at the national level and apportioned it to Kent based on its share of overall GVA per head). This results in the following gross and net GVA per annum.

Table 4.2: Gross and Net GVA per annum

Gross and Net GVA per Annum	Large		Regional	
	50,000 (min)	75,000 (max)	100,000 (min)	150,000 (max)
Average GVA per employee	£21,516	£21,516	£21,516	£21,516
Gross jobs	116	174	232	348
Gross economic impact	£2,495,856	£3,743,784	£4,991,712	£7,487,568
Net additional local jobs	108	162	216	324
Net economic impact	£2,323,728	£3,485,592	£4,647,456	£6,971,184

4.07 The figures above indicate that the combined effects of displacement and leakage out weigh the multiplier effect. However, it is important to note that whilst there will be some leakage from the local economy (North Kent Thameside) it is more than likely that the majority, if not all, of the benefits will be contained within the slightly wider area and indeed within the region thus meaning the casino will be a significant generator of both jobs and money for Kent and the South East.

Regeneration Outputs and Outcomes

4.08 In addition to the employment and GVA impact outlined above, it is expected that a casino at Ebbsfleet would help to achieve a number of other outcomes and outputs and these are listed below:

- Reduced unemployment in the wards surrounding the Ebbsfleet site (*according to the claimant count*);
- Reduced levels of deprivation in wards surrounding the Ebbsfleet site (*as measured by IMD*);
- Acting as a catalyst to drive the remainder of the Ebbsfleet site forward for development and contributing to the development of the Thames Gateway as a whole;
- Improved skills and qualification levels (*as measured by Census and other sources*);
- Reduce out-commuting as the Ebbsfleet site would provide local employment opportunities which meet the skills and occupational needs of the local population (*as measured by the Census*);

- Increased business formation close to the casino site (*as measured by VAT registrations*); and
- Increased tourism in Dartford (*as measured by local impact studies*).

4.09 It is expected that the wards closest to the casino such as the Swanscombe ward in Dartford and the Northfleet North and South wards in Gravesham will particularly benefit from the scheme. According to the IMD 2004, the majority of deprived SOAs are located close to the Ebbsfleet site and this provides an excellent opportunity for these communities to benefit. This will be achieved by working with key programmes such as Employ Kent Thameside and Urban Thames Gateway Kent. It will also be achieved by ensuring that the casino operator has regards to the needs of the local community and ensures that where possible they can benefit through for example recruiting locally and providing opportunities for local supply-chain development.

5 WILLINGNESS TO LICENCE

5.01 This section demonstrates the willingness to licence a casino in Dartford if it is selected by the Casino Advisory Panel. The following evidence is available:

- A recent Dartford BC Cabinet Meeting has indicated that **the Council is supportive of an application** for a regional/large casino at Ebbsfleet. “Members agreed that the range of potential benefits to both the project at Ebbsfleet and the borough were substantial and supported an application for a casino licence.”¹⁵
- Springboard Marketing Ltd has recently carried out **a survey of 318 people living in the borough of Dartford** to find out their views on the redevelopment of Dartford. Over 79% of those which were interviewed were supportive of the redevelopment of the area and an even higher percentage - nearly 86% were supportive of the expansion of leisure and hospitality facilities in the Dartford borough. A lower proportion were supportive of a casino, with key concerns including concern over crime and associated trouble, and general opposition to gambling and casinos. Our discussions with casino operators suggest that they are pro-active in preventing crime and furthermore experience from elsewhere indicates that there is not a proven relationship between casinos and increased crime. A comprehensive communications strategy is therefore required to support a casino proposal in Dartford to alleviate the public’s fears and enable them to make an informed judgement on the development of a casino.

5.02 Ebbsfleet has been identified in the Local Plan as being a suitable location for a casino development according to the Home Office. Furthermore, a recent letter¹⁶ from Dartford Borough Council to casino operators confirms that the proposed site would be suitable for the development of a casino. It states that “Ebbsfleet Valley, being located near to the proposed new commercial centre and International Train Station at Ebbsfleet is **the most suitable site** for casino development in the borough and may provide opportunities at some point in the future.”

6 PROBABILITY OF IMPLEMENTATION

6.01 This section clearly identifies that a casino at Ebbsfleet has the potential to be implemented successfully and become a success. There has been strong interest from casino operators, with extensive experience of working in the UK in developing the scheme and they have indicated that there would be significant demand for a casino at Ebbsfleet. The location of

¹⁵ Dartford Borough Council, Cabinet Meeting Minutes, 23 March 2006

¹⁶ Letter from Angela Roughton, Planner (Planning Policy), Titled: The Gambling Bill and Deregulation, 22 April 2004

the scheme with excellent transport links would also help to stimulate demand. Finally, there is little current provision, which would be expected to compete with a regional or large casino, which would also add to the schemes success.

Demand for a Casino

- 6.02 A market demand analysis relating to both resident and tourist demand has not been carried out. However, market research has indicated that there is positive support for the expansion of leisure and hospitality facilities in the borough of Dartford. A recent survey of 318 people found that 86% were in favour.
- 6.03 Based on extensive experience of running casinos, London Clubs International expect that the primary catchment area for a large casino is 1 hours drive time and the Rank Group anticipate that the Ebbsfleet casino could draw visitors from a 2 hour drive time. The primary catchment would be even greater for a regional casino. The site benefits from close proximity to London and a good transport infrastructure.
- 6.04 London Clubs anticipate that spend per head within a large casino at Ebbsfleet is likely to be in the region of £50 and £60 per visit. They would expect that around 70% of visits to be made within the hours drive time and the remaining 30% from outside of this area. They anticipate that around 5,000 visits would be made per week and an annual turnover in the region of £15 million could be achieved. Given the fact that there is little gambling provision in Dartford at present and certainly no casino, this will result in significant additional expenditure to current gambling spend. This would be even greater for a regional casino.

Current Provision and Competition

- 6.05 A report carried out by DTZ for Land Securities¹⁷ examined the current provision of gambling and leisure activities across London and the Greater South East and this has been updated for the purpose of this application.
- 6.06 In London, casinos only operate in two out of 32 boroughs i.e. Westminster and Kensington and Chelsea. These casinos offer a mixture of slot machines and table games, including roulette, poker, craps and blackjack. Currently size varies. There is only one other casino in Kent at Margate. In North Kent and southeast London there are eight Gala and three Mecca bingo operations. Operations closest to Ebbsfleet include two Gala Bingo clubs close to Dartford and Mecca Bingo operations at Bexleyheath and Eltham.
- 6.07 In terms of other leisure developments, both Bluewater and Lakeside offer regional out of town retail and leisure. Retail makes up the majority of each scheme, although both offer a comprehensive food offer and Bluewater offers a multiplex cinema. Whilst Bluewater has a showcase cinema, neither Dartford nor Gravesham has a cinema offer. Other cinemas are located at Sittingbourne, Faversham and Bromley.
- 6.08 There are five notable out-of-town leisure parks in Kent and Southeast London. Medway Valley Leisure Park in Rochester (some miles east of Dartford) is a scheme of some 154,000 ft² anchored by a UGC cinema offering a selection of bars and restaurants. Lock Meadow at Maidstone (some 20 miles east) provides some 150,000 ft² space anchored by an Odeon cinema and Luminar nightclub along with a range of A3 operators.
- 6.09 There are two leisure schemes at Croydon (some 20 miles west) of Ebbsfleet. Valley Park comprises 130,000 ft² anchored by a Vue Multiplex Cinema and the Colonnades providing

¹⁷ The Leisure and Casino Market Opportunities, DTZ on behalf of Land Securities (December 2004)

160,000 ft² encompassing a selection of A3 bars and restaurants and including City Limits, Greens and Pizza Hut. An Odeon Cinema anchors Knights Park in Tunbridge Wells. The scheme of some 100,000 ft² also includes an Esporta and Tom Cobbler and is owned by Britannia Life.

- 6.10 It is not considered that a regional or large casino at Ebbsfleet and associated development would compete to a significant degree with existing gambling facilities and other leisure provision. A regional casino at Ebbsfleet would be one of a kind in the whole of the country and would draw high numbers of visitors from outside of the area who would not generally attend any of the facilities outlined here. The proposed casino at Ebbsfleet will be part of a much larger scheme within the Ebbsfleet development comprising a hotel (min 150 rooms), conference facilities, cultural space, retail as well as residential and offices. It is expected that a casino would therefore be a catalyst for further leisure developments, creating a critical mass, which will have an even greater positive impact on the local area. It will be very much linked to other developments planned on the site.

Operator Interest and Levels of Investment

- 6.11 The strong track-record of the owners of the site and casino operators confirms that a casino scheme at Ebbsfleet would be a considerable success. Land Securities own the Ebbsfleet site together with Lafarge and both of these are significant operations with a strong track record. The scheme will be predominantly managed by Land Securities and they have a substantial development programme including regeneration schemes in historic British cities, major retail-led regeneration schemes and Central London mixed-use developments. Land Securities have recently circulated an Invitation to Partner to select a leisure and casino operator. This has received overwhelming interest and the following operators are in discussions regarding the proposals:

- **London Clubs International plc** has more than 35 years experience of casino gaming, including international experience. They currently operate five casinos in London and two outside of London (in Southend and Brighton), with licenses to develop a further five. All of the developments are in excess of 50,000 ft² and could be Large Casinos. They also operate casinos in Egypt, the Lebanon and South Africa. Proposing to invest approximately £7 million in the development of a large casino and £15 million in the fit out costs. This would be wholly funded by LCI;
- **Rank Group plc** is an international gaming and leisure group employing more than 20,000 people in Europe and North America. Gaming business companies include Mecca Bingo, Grosvenor Casino, Hard Rock Casinos and Blue Square in UK; and
- **Gala Group Ltd** operates across 198 sites and employ around 10,000 people. They operate 166 bingo clubs and 32 casinos across the UK, Isle of Man and Gibraltar.

- 6.12 The strong level of interest received to date suggests that the scheme would be implemented successfully. All of these have extensive experience of managing large-scale developments.

Location and Transport Infrastructure

- 6.13 Ebbsfleet is considered to be the most appropriate site for a large or regional casino in Dartford for the following reasons:

- The proposed site is considered to be consistent with the objectives of local and regional planning policy as identified in paragraphs 7.08 to 7.12 below;

- A letter from Dartford Borough Council to casino operators¹⁸ identifies Ebbsfleet as the most suitable site for a casino development. The letter states that “Ebbsfleet Valley, being located near to the proposed new commercial centre and International Train Station at Ebbsfleet is *the most suitable site* for casino development in the borough and may provide opportunities at some point in the future.”
- The site is located close to a good road network and offers the best possible provision of public transport (as outlined below);
- The development of a significant number of homes on the site will provide close proximity to a good supply of labour for the casino;

6.14 A site-wide transport strategy for the Ebbsfleet site has been approved in principle and will ensure that there is sufficient provision for transport on the site, linking it to other parts of the borough. Ebbsfleet is just 15 miles from London and has good access to the road network and excellent public transport provision as identified below. The site is located close to the A2, which links Dartford to London and provides easy access on to the M25 and M20. Northfleet Station is located in close proximity to the site with rail connections to London Bridge, Cannon Street, Waterloo East and Charing Cross. The **Channel Tunnel Rail Link** (CTRL) would be located opposite the proposed casino and will connect Ebbsfleet to London’s St Pancras in just 17 minutes. It will also create a new gateway into Europe. International services will use the CTRL from 2007 and high-speed domestic services should operate from 2009. The site is also in close proximity to a number of **airports**. City Airport is approximately 29 minutes drive from Dartford, Gatwick a 39 minutes drive and 40 minutes to Stansted. Finally, **Fastrack** is a rapid transit system, which links all the major developments in Kent Thameside, providing an integrated public transport network. This is just operational and will serve the Ebbsfleet site specifically as well as other parts of Kent Thameside.

7 REGIONAL AND LOCAL CONTEXT

7.01 This section demonstrates that the proposal for a casino at Ebbsfleet would make a substantial contribution to national, regional (south east), sub-regional (Kent Thameside) and Local (Dartford) Policies.

7.02 The **Sustainable Communities Plan** identifies four growth areas one of which is the Thames Gateway. The plan identifies the “huge opportunity” presented by the Thames Gateway, which covers a large area (43 miles long by 20 miles across); is located close to London and in a strategic location close to major transport links to the continent. It is cited as having one of the largest concentrations of brownfield sites in the country and provides the opportunity to regenerate existing deprived communities through access to 300,000 new jobs that could be accommodated by 2031. The Plan specifically mentions Ebbsfleet as a “model of mixed-use urban development centred on new international passenger station on the Channel Tunnel Rail Link.”

Economic Policy

7.03 Here, we outline the key regional, sub-regional and local policies for economic development as outlined by SEEDA, in order to show how the proposal will assist in achieving regional economic objectives for employment, skills and regeneration. Other policies on the development of tourism and leisure have been considered in paragraphs 2.09 to 2.15 of this application.

¹⁸ Letter from Angela Roughton, Planner (Planning Policy), Titled: The Gambling Bill and Deregulation, 22 April 2004

7.04 SEEDA are currently consulting on the **Regional Economic Strategy for the South East** for 2006-2016. The overall vision reflects the current strategy which is that “*by 2016, the South East will be a world class region achieving sustainable prosperity.*” The strategy is built on 6 drivers of regional prosperity and four of these are particularly relevant, with the key points considered below:

- **Employment** – the overall objective for the region is that by 2016, 85% of residents in the South East will be economically active. The strategy refers to raising economic activity rates through raising skills levels, quality and status of low paid jobs. The proposed casino, would contribute to this objective by providing employment opportunities for local people, which offer training and well-paid opportunities;
- **Skills** – the overall objective is that by 2016, the workforce in the South East will have the skills and flexibility to sustain a world-class economy. One of the objectives is to ensure that individuals can access the skills they need to enter and progress in the labour market, which would be central to the aims of a casino development at Ebbsfleet;
- **Enterprise** – the overall objective is that by 2016, the SE will become one of the worlds most entrepreneurial regions. One of the actions is to invest to ensure higher business start-up and survival rates, particularly in disadvantaged areas and communities. A casino at Ebbsfleet would provide supply-chain opportunities, which could provide potential for new enterprise initiatives if linked with existing initiatives to do this; and
- **Investment in Infrastructure** – the overall objective is that by 2016, the infrastructure necessary to support sustainable prosperity in the South East will be substantially in place and programmed. The strategy specifically identifies the need to support growth areas such as the *Thames Gateway* through land assembly, direct development and transport projects.

7.05 The **North Kent AIF**¹⁹ sets out an overall vision for the sub-region that “*by 2021, North Kent will be the best place to live, work and do business.*” It sets out three quality of life targets for North Kent to 2021, and these are:

- **Household incomes equal to or higher than the rest of the South East** – *the proposed casino at Ebbsfleet would contribute to this by providing local employment opportunities in well-paid positions;*
- **Performance on health, education and other key indicators that matches, if not exceeds the South East** – *through the provision of employment opportunities, the casino will contribute to the quality of life, including through education and skills; and*
- **All North Kent wards to be outside of the 50% most deprived wards in the UK** – *again by providing employment opportunities the casino would help tackle deprivation in those wards closest to the casino which suffer from high levels of deprivation.*

7.06 The Ebbsfleet site is specifically mentioned as a priority for development and its development (among other projects) is critical to achieving the North Kent AIF targets.

7.07 The **Regeneration Strategy for Dartford**²⁰ sets out how we will implement significant regeneration within Dartford in the light of the Governments designation of the Thames Gateway as a growth area. Key areas of focus will be on attracting investment; providing

¹⁹ Realising North Kent’s Potential, North Kent Area Investment Framework (AIF), Thames Gateway Kent Partnership

²⁰ Dartford Borough Council Regeneration Strategy

jobs; tackling inequality; focusing on the needs of existing communities as well as new developments; supporting sustainable infrastructure in accordance with needs and demands; and, ensuring environmental improvements as well as social and economic improvements. The casino would contribute to all of these objectives.

Planning Policy

7.08 SEERA have been consulted on the proposals for a casino at Ebbsfleet and they have indicated the policies within the RSS, which are most relevant to this development. Policy TSR4 of the **Draft South East Plan**²¹ sets out specific guidance in relation to the development of regional casinos and other major leisure destinations in the South East. The Plan identifies that the first location where regionally significant developments should be located includes the Thames Gateway. Local Authorities should develop the following criteria to determine applications for new developments:

- Do they help to reinforce the distinctiveness of a locality – *a casino will contribute to providing a unique identity for Dartford which is currently not obvious*;
- Are they accessible by public transport – *we have identified above, how accessible the site is to public transport with the CTRL located adjacent to the casino and with Fastrack*;
- Do they provide wet weather facilities and help to extend the season – *a casino at Ebbsfleet would be indoor and not seasonal and would comply with this objective*;
- Will they facilitate regeneration – *one of the main objectives of bringing forward the Ebbsfleet site is to contribute to the regeneration of the local area*; and
- Are they complementary to existing attractions or will they displace existing activity – *the displacement effect for the proposed casino is considered to be low*.

7.09 Policy TC3 states that the strategic network of town centres should be the prime focus for large-scale leisure developments (above 10,000 m²) such as casinos. The South East Plan identifies Ebbsfleet as having the function of a business location and key economic driver and Dartford as a secondary regional centre. Policy TC4 outlines the need to create and support town centres and states that Local planning authorities should adopt a sequential approach in selecting appropriate sites for town centre uses. This is in line with Policy LRT1 in the **Dartford Local Plan** which indicates that Dartford town centre is the preferred location for new leisure uses followed by the North Eastern “Edge of Centre” policy area. Other locations such as Major Development sites (i.e. Ebbsfleet) will be permitted if they:

- **Are appropriate in scale and size to the locality** – *Ebbsfleet is a major development site so it is considered that a large or regional casino would be suitable*;
- **Provide facilities to serve the local population** – *it is estimated that the majority of visitors will be located within around an hours drive of the site. The casino will be part of a wider development providing a range of uses for the local population*;
- **Do not give rise to unacceptable disturbance to nearby residents** – *the location of the casino away from the main residential areas planned as part of the overall development suggests that any disturbance will be minimised*; and
- **Are well served by public transport and will not generate unacceptable levels of traffic** – *the proposed scheme will be very well served by public transport (including CTRL and Fastrack)*.

²¹ Draft South East Plan, SEERA (NB that this document has been approved by the Regional Assembly and will be submitted to the Government for approval at the end of March 2006)

- 7.10 The Ebbsfleet site is considered to be the most suitable site for the casino development due to the fact that it is part of a much larger residential and commercial scheme located in close proximity to CTRL. In a recent letter to casino operators, we have considered all of the key development sites in Dartford (including the town centre) and this has confirmed that Ebbsfleet is the most suitable site. The town centre is considered to offer little opportunity for major developments of this kind at present with key development sites currently being developed.
- 7.11 The **Local Development Framework** for Dartford is currently being prepared. A recent issues and options paper outlined 8 key issues including Regeneration and Transport and Leisure and Culture. Making the best use of strategic sites such as Ebbsfleet is a priority to build strong new communities.
- 7.12 **RPG9a: the Thames Gateway Planning Framework** (1996) sets out a vision for the Thames Gateway to become a focus for new jobs and new homes offering an improved quality of life for those who live and work there. The planning framework envisages two main centres for development and growth, one of which is Kent Thameside (incorporating Dartford and Gravesham). The document specifically refers to Ebbsfleet Valley as a focus for growth in the South East and states that ‘planning policies should therefore whilst respecting the landscape, natural and archaeological features in the Valley support the development of Ebbsfleet as a commercial centre, offering employment opportunities for those who currently have to commute into London from north and east Kent.’ **The Interregional Planning Statement (2004)**²² identifies five strategic development locations, one of which is North Kent Thameside, where development will be particularly focused and which will take advantage of private sector investment.

8 COMMUNITY BENEFITS

- 8.01 The community would be expected to benefit enormously from planning obligations resulting from the overall development of Ebbsfleet Valley with the current proposals indicating the potential for access improvements, new community facilities, including schools and GP Surgeries and affordable housing among other improvements. It is expected that the casino operator would make some financial contributions, for example to improving the security of the area through CTTV and improved lighting. As outlined elsewhere in this document, the benefits to the community are expected to be far greater than just financial benefits.

9 UNIQUE CHARACTERISTICS

- 9.01 There are two main characteristics, which make this proposal unique. The casino would be located in the Thames Gateway, which is a national priority for development and growth. The Ebbsfleet site is considered to be one of the most strategically important sites in the Thames Gateway, offering significant potential for residential and commercial development. The casino would add to the vitality of the site, making a positive contribution to the overall leisure offer.
- 9.02 The site is in an excellent strategic location, close to London. The casino would be located directly opposite the Channel Tunnel Rail Link, which will provide trains to St Pancras in only 17 minutes and easy access into Europe.

²² Growth and Regeneration in the Gateway, the Interregional Planning Statement (2004), Thames Gateway Planning Bodies – incorporating the East of England Regional Assembly, Mayor of London and the South East Regional Assembly