

Great Yarmouth Casino Response to Casino Advisory Panel Supplementary Questions

1.0 Type of Area

Q In paragraph 5.20 you assume a growth in visitor numbers but earlier, at 1.4, you refer to past decline in visitor numbers and a risk of further decline. To what extent is the reversal of the trend to be expected from the development of the proposed casino ?

A Numbers of tourism related visitors to Great Yarmouth peaked in the late 1970's early 1980's when we attracted almost 12 million visitor nights per annum. Although the way in which such information is collected has changed over the years it is still used as an indication of how tourism has suffered a gradual decline since then, until it stabilised some 4 years ago at around 5 million visitor nights.

Over the last two years we have delivered a £16m programme of investment in public realm and townscape heritage improvements. Appendix 1 outlines our output reconciliation framework figures as agreed with the East of England Development Agency (EEDA). From this it can be seen that we are projecting over 618,130 additional visitors as a result of this work alone. Very anecdotally our impression from local businesses is that the current season has seen a marked improvement on the previous year's visitor numbers. During the current year we hosted a sand sculpture show on the beach that attracted 160,000 visitors for which we estimate 40,000 were new. We are planning for a similar event in future years.

The Council has just commenced a further £2.5m of capital investment to undertake phase 2 of a 3 phase highway and public realm improvement programme along the seafront. In addition we have marketed an 11 hectare prime seafront site as being suitable for redevelopment which has attracted significant interest from the development community. All of these investments will give greater certainty of success for any potential Casino development.

Having spent a great deal of time and effort liaising with current and potential casino operators we have used information from them to inform our overall projections and assumptions. We believe that a large/small casino would attract 250,000 additional visitors per annum. Of course this does not include any visitors arising from possible ancillary potential uses such as multiplex cinema, entertainment, restaurant etc.

In general terms no single development on its own can deliver wholesale regeneration or a complete reversal in tourism fortunes. We believe that it is crucial to create a range of unique selling points that

work together to establish a new sense of destination. One of our key aspirations is to stretch the current very seasonal tourism offer to provide an all year round offer. The casino is a central part of this aspect of our vision. There is a national shift towards more day and short break visits; hence it is important to develop a range of attractions that work together to create a behavioural driver. This of course has to be supported by a comprehensive and sustained marketing and promotional campaign.

2.0 Social Impact

Q What research or survey material is available to support the statement that ‘there is no evidence of social problems based on existing gambling’?

A Prior to submission of our bid, research was undertaken locally through detailed discussions with the Area Commander and local licensing officer from Norfolk Constabulary who referred to local crime, disorder and anti social behaviour statistical records. In addition the Manager of the local Citizens Advice Bureau confirmed that they have no evidence of any prevalence or higher levels of dependency on gaming or gambling. Notes of these discussions have been retained.

The Council’s Statement of Gambling Policy includes specific provision for the expansion of casino provision. During the consultation process we received no formal objections or concerns relating to our proposal. The consultation process included all of the key support agencies, Gamblers Anonymous, Police, faith groups, voluntary and community sector groups and partnerships.

The additional information supplied in August outlined how the Stakeholder panel selected to review potential proposals locally will include key community representatives such as the Police, CAB, and the Local Strategic Partnership. They will be reviewing how Casino operators will work to manage this situation and keep possible negative social impacts low.

3.0 Need for Regeneration

Q What leads you to the assertion in paragraph 3.31 of 1200 employees in a regional casino, 400 in a large casino, and 200 in a small?

A As mentioned above we have undertaken extensive industry consultation and have established a real sense of confidence and scope for such a development in Great Yarmouth. To a large extent each development will reflect the particular market it serves. Potential casino operators have a unanimous belief that the Great Yarmouth

development would act as a destination venue and therefore would support a range of mixed uses. Some of these uses would act as benchmark for other local venues; and there is still confidence that a four star hotel can be developed as part of the proposal.

Appendix 2 schedules how our proposal for a regional Casino was calculated. With the benefit of more time to consult operators we have revised our estimates to 350 jobs for large and 140 for a small. Our planning estimates are currently including an additional 50-65 jobs for a hotel and 60-80 jobs in the area of food and beverage. These ranges allow for the differing proposals each developer has.

Q In the case of large/small casinos would it still be the intention to create an academy to offer training facilities for individuals in the gaming industry?

A Yes ! – We already have an academy for those involved in the food, hospitality, and hotel industry. There is also an associated training programme for those in the security industry. Great Yarmouth College have been developing this proposal and have been communicating with colleagues proposing similar facilities in other parts of the country. We aim to secure a commitment from casino operators to sustain this facility as part of our selection processes. Discussions with operators have revealed a keenness to do this. We do see this particular proposal as being of sub regional importance, and it becoming an industry recognised centre of excellence.

Q What further progress in planning or operational terms, has been made in addressing the decline of tourism?

A This has largely been answered in section 1 above. It is important to mention that the Council holds the freehold for most of the property within the seafront area. As such we are strategically reviewing opportunities within our own built estate to further develop the tourism offer. This builds upon the baseline report received from Halcrow in June this year that the additional information sent to you in August refers to. Over one third of all jobs in the area relate to tourism in one form or another, and it is our intention to redevelop and invest in the seafront area as it effectively is our 'shop window'. This commitment and confidence is giving potential developers a sound basis for unleashing their ambition whilst managing any potential commercial risk. The firm expressions of interest we have received from operators confirm this.

As a result of our proactive approach to stimulating regeneration we have been working with the new owners of the main shopping centre to encourage long term investment. We are currently considering a planning application for a 20,000ft² expansion to the town's central shopping centre. For confidentiality reasons I am unable to say who

heads of terms have been agreed with, but suffice to say that this will give a much needed boost to the retail economy and help lift the quality of the overall retailing offer. As a destination resort all such developments are seen as being complimentary to the tourism product.

Since the August submission we have also given planning permission for the development of a 65 metre diameter big wheel' that will be, in UK terms, second only to the London Millennium Eye in terms of size. This also will be operated as an all year round attraction and is expected to generate 25,000 – 30,000 new visitors per annum. This will be in operation by May 2007.

The development of a new deep water outer harbour as mentioned in previous submissions is progressing extremely well and construction is due to start in January 2007. It will be operational by autumn 2008, and ferry operations should begin during 2009.

Since the last submission to the Casino Advisory Panel, the Council has published its "Preferred Options" for its "Core Strategy, Local Development Framework" document.

This Core Strategy, which covers the period to 2021, contains four elements:-

- an overall spatial vision of the borough;
- a set of spatial objectives;
- a series of policies for addressing the vision and objectives;
- a set of indicators and targets.

Relevant vision and objectives encompass:-

- Health and population;
- Education;
- Crime and anti-social activity;
- Poverty and social exclusion;
- The economy;
- Tourism.

The Council's Preferred Policy Approach is outlined in Appendix 3. Casino's and their associated developments are entirely consistent with the strategy.

4 Willingness to licence

No questions

5 Probability of implementation

Q You mention at paragraph 5.1 a proposal for the “Pleasure Beach” area which has outline planning permission and the support of the Council. What is the current state of this proposal? Are there signs of it being implemented, for example detailed plans being submitted for approval?

A The proposal for the Pleasure Beach Complex has the benefit of outline planning permission in principle. The Council’s Development Control Committee agreed to the development of the land for a hotel, leisure etc, resort, subject to a Section 106 Agreement. The owner has held off developing further detailed plans until there is greater certainty over the award of a licence to Great Yarmouth. Their plans will be developed fully as part of the local licensing and operator selection process.

As mentioned previously through the summer the Council has brought forward an 11 hectare central seafront site for redevelopment. We have received over a dozen written expressions of interest in that site from potential developers. There are eight firm expressions from developers/operators that include casino proposals. The larger proposals for a mixed use development range from £35-45m in total. The casino would act as the anchor for these developments and would provide space for associated hotel, leisure, entertainment, and car parking.

This is significant in that it is an alternate site where the planning framework supports development of this kind, and it provides competition to the initial site, and therefore an opportunity to maximise the value of the development and achieve maximum community benefit in selection and award process locally. We will defer making any judgement until the position over the award of casino license by the DCMS. An impact study reviewing and modelling the potential uses, outputs, outcomes etc has just been commissioned jointly the council and EEDA. This will inform the independent stakeholder panel’s evaluation of any firm proposals.

6 Regional and Local Context

Q At paragraph 3.7 of your proposal you refer to your council’s submission to the EiP of the draft East of England Plan. Has the recently published Panel Report anything to say on these submissions?

A The Panel Report states at paragraph 5.45:-

“The EiP heard about Great Yarmouth’s candidacy for the new regional casino or a large casino. That will be determined by DCMS on the advice of a special Advisory Panel, in parallel with the process for

finalising the RSS. On that basis, and given that the East of England has several other candidates, we have not seen it as the role of the EiP to establish priority for casino development at one particular location within the region rather than another.”

The report is now with the Secretary of State and her proposed modifications to the plan are awaited.

Q **Whilst the remit of the Panel is to advise only on the broad location of casinos, you have chosen in your proposal to identify the “Pleasure Beach Complex” as the location for a casino. How does this location relate to the town centre, which is the preferred location for casinos in PPS6 ? If not, what is your justification for identifying the others contrary to this policy? In respect of location, do you consider that its accessibility would be such as to encourage problem gambling and attendance by problem gamblers?**

A The Pleasure Beach Complex is some 2.03 km from the town centre when measured in a straight line, or approximately 2.70 km by road.

The town centre is physically separate from the sea front which has its own centre of influence, the ‘Golden Mile’. Great Yarmouth’s town centre is largely bounded by its medieval town wall. Its historic street pattern and ‘Rows’ (alleyways) rule out large scale developments within the town centre due to the unacceptable impact on the historic built environment. There are no central sites which are available or could be made available in, or close to, the town centre. However, in both town centre and seafront areas there are existing premises which have the benefit of casino licences. Planning consents have already been granted for casino developments (essentially changes of use) for several small/large casino proposals in the central seafront (details already submitted).

PPS6 does not recognise the role of seafront / tourist trading areas which are physically separate from the town centre. For Great Yarmouth, the central, commercial focus of the seafront tourist industry is the ‘Golden Mile’. In this context, the Pleasure Beach should be regarded as “edge-of-centre” to the seafront. Equally in ‘pure’ PPS6 terms and its relationship to the town centre, the seafront is legitimately both ‘edge-of-centre and ‘out-of-centre”.

The Council’s InteGreat project, linking the town centre, heritage and seafront areas is rapidly bringing cohesion between these three previously distinct ‘quarters’. Regeneration of the seafront is now paramount and there are several opportunities for new dynamic development schemes. This proposed redevelopment would provide for a large/small Casino to supplement the town’s existing and (planning) consented provision. Six applications involving Casino developments have been approved by the Council since 2002.

Excluding the Pleasure Beach, one is town centre (for the conversion of a former supermarket) and the other four are on the seafront 'Golden Mile'.

Whilst the Pleasure Beach remains a strong contender there are other realistic, deliverable options, that will provide an opportunity to maximise the impact and wider benefit from the granting of a licence.

A seafront proposal will bring life and vitality to the seafront, both during the winter and 'shoulder' periods of the main holiday season. There are no suitable sites within the historic town centre (or its immediate edge) to accommodate a large casino without considerable demolition of historic buildings, which would be totally opposed by not only the Council but by historical and amenity societies (both national and local). The seafront meets the accessibility and sequential tests set out in PPS6. The current Norfolk Structure Plan considers the seafront to form part of the town centre for leisure and entertainment uses.

A number of arcades and a casino exist within the seafront 'golden mile'. As mentioned previously there is no evidence that any form of 'problem' gaming or gambling in the area.

7 Community Benefits

Q Without a Regional casino, what specific benefits will be generated for your area by a large or small casino, and how would you go about securing them?

A The additional information sent in August and much of the above outlines aspects of this issue. Given that, in addition to the Pleasure Beach Complex site, we now have firm proposals that have been market tested, we have a soundly based confidence that significant regeneration benefits can be achieved if successful in being awarded a Large casino license. As mentioned above we already have proposals for a comprehensive development of up to £45m. A Small casino would have a reduced effect. We also have a longer term view that a well run successful Large casino, in the right location, and on the right site, offers an excellent opportunity for expansion into a Regional casino if the number of licenses are increased in the future.

We have used the last few months productively and believe that we have placed Great Yarmouth in an excellent position to deliver on all aspects of the criteria set by the panel. Stimulating inward investment and creating economic lift is at the heart of our wider regeneration strategy. The larger the development the more benefit can be achieved. We will use the operator selection and planning process to maximise community benefits. Discussions with operators have confirmed that they are more than willing to support innovative and sustainable proposals such as contributions to park and ride facilities,

the academy, enhanced street scene and seafront management services. The council has a policy to reinvest all income from its own asset disposals in furthering our wider regeneration aims; this is also true of the seafront site mentioned above. One proposal being considered is the feasibility of the successful developer constructing a new public sport and leisure centre within the Urban Regeneration Area in exchange for the seafront site.

The evaluation framework for realising community benefit will form part of the Community Stakeholder Group's consideration of each operator's individual proposals. These commitments will be embodied in a Memorandum of Understanding with the chosen operator, and will inform the planning condition, and section 106 negotiations.

8 Unique Characteristics

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

A When the answers given above are taken as a whole we feel that our proposal is unrivalled. The discussions held at Director level with the leading UK casino operators and new entrants from Europe have revealed that in their view Great Yarmouth offers one of the optimum opportunities to develop a destination or resort large casino, and ultimately be excellently placed to bid for a regional license. The progress we have made since the original submission demonstrates that we are a 'can do' council that has all the fundamental building blocks in place to make a success of this development.

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

A A small casino alone would enhance the current tourism offer; however taken alone it would not have the same effect in creating a new sense of destination for the area, it would simply reinforce the current offer. As mentioned previously there are a number of premises that have planning permission for a casino (1968 Act) and there is a greater possibility that wider regeneration aspirations could not be achieved. Great Yarmouth aspires to remain at the forefront of UK tourism and we recognise that changing current perceptions and significantly developing the distinctiveness of the area is key to achieving that aim.

Mark Barrow
Deputy Chief Executive
29th September 2006

APPENDIX 3

The Council's Preferred Policy Approach is outlined below:-

Policy CS1 – Sustainable Development

New development should:-

- a) be appropriate to the settlement in terms of scale, location, impact on amenity, character (etc);
- b) N/A
- c) includes measures to manage traffic and congestion;
- d) N/A
- e) make provision for services to the public and infrastructure made necessary by the development;
- f) be designed to a high standard, being attractive, adaptable, accessible, safe and secure;
- g) promote sustainable economic growth and employment;
- h) promote safe and inclusive communities by reducing social inequalities and disadvantages and through improving health, economic and social well-being;
- i) – l) N/A

Policy CS3

To generate economic growth in the brownfield and waterfront areas of Great Yarmouth.

- a) a flourishing local economy to provide jobs and wealth;
- b) a safe and health local environment;
- c) – f) N/A
- g) good quality local public services;
- h) a diverse, vibrant and creative local culture.

Policy CS8

The location and design of development proposals should:-

- a) enable ease of access to, around and within the scheme for all potential users, including those with disabilities and young children;
- b) incorporate appropriate and conveniently located facilities that address the needs of potential user groups;
- c) minimise the extent the users feel at risk from crime by:-
 - enabling passive surveillance of public spaces and parking areas;
 - distinguishing clearly between public and private spaces, and maximising the extent to which spaces are controlled (or perceived to be controlled) by occupiers;

- incorporating appropriate security measures, such as lighting and hard and soft landscape treatments.

The above indicates, in terms of strategy, how the Council is progressing in developing an appropriate planning policy framework for the future.