

**Comments received on draft casino policy**

No.	Organisation	Comments	Accepted into policy?	Reason why or why not?
1	Norfolk Constabulary	I found this to be a very comprehensive and inclusive document. I find that I have no alteration or amendment to offer at this time.	No	Comment only
2	Jay's UK Ltd	<p>Re: The Draft Casino Policy – Please put the following points for the committee/council to consider:            Siting the casino and other new leisure facilities other than at the heart of the Golden Mile (i.e. the councils extended 'Marina' site) will have a devastating effect on current seafront businesses which are already struggling to survive – to back either the 'Edge' scheme or the 'Riverside' scheme will effectively kill off the rest of the seafront – why? Because the new schemes will have parking which the central seafront disastrously does not have anywhere near enough of. - If a fantastic scheme can be accessed for the Marina site all the seafront will benefit from the new attractions and the extensive new parking area which will have to go with it.</p> <p>Such a scheme should have ground breaking new quality attractions and not just compete against existing attractions which it would completely destroy if it replicates. The knock on results would be catastrophic for existing seafront owners, many who have been in the resort for years and seen it through thick and thin. Jobs will just move from one area to another, and nothing will be gained. Think how an out of town shopping centre kills the local High Street, this has the</p>	<p>No</p> <p>Yes</p>	<p>Location is already covered in policy and would include this area</p> <p>Criteria already includes: regeneration (including car parking) and job displacement. Criteria amended</p>

		<p>same effect.</p> <p>This is the most important decision the council will ever make – and I'm worried that the lack of any public progress with the Marina site shows they will be trying to take the less controversial path and not choose their 'own' site. - This is our and theirs only chance of getting a truly fabulous Marina centre scheme with great sports facilities and new attractions for locals and visitors that really live up to peoples expectations and our chance to get say 500 central car parking spaces that need to service this and that will help the rest of the seafront survive and go forward. I'm worried that the 'we've run out of time' excuse will be used again as it was with the integrate scheme. Great Yarmouth has truly hit the jackpot by winning the 'large' Casino prize - (I have been personally advocating the use of Las Vegas style casino's to regenerate all British resorts for over 20 years – when I first stated my views they were considered completely crazy!) Now we have it, we must not throw the opportunity away.</p> <p>This is the councils one and only chance to give the town and resort the boost it needs to survive with outside investment and new attractions – but they have to play their winning 'hand' in the right way by getting a scheme that doesn't destroy the heritage they already have, it's also their only chance of getting the financial impact of having a great new revenue, provider for them with the Marina site deal – if they pitch it right, this could help the rates burden for generations to come.</p> <p>The board of the advisory panel will need to be very switched on to get this decision right and I personally think that as one of this panel is from the GYTA, of which one of the proposed schemes is also a</p>	<p>No</p> <p>No</p>	<p>to include innovative attractions and how development will compliment existing businesses.</p> <p>Cannot take any agreements into account</p> <p>Policy already takes this into account. Advisory panel will not have any</p>
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		<p>director there could be a conflict of interests, this needs to be taken into consideration – I already have seen many cliques of interested parties forming!</p> <p>Another major downside of the 'Edge' positioning is that it blocks any extension to the port area which I think places it in totally the wrong place – we all want the port to be a success and now if you drive down there you can see that this land is not the right place to place a leisure centre, it's absolutely obvious it will be needed for additional port use as the port grows, which is something the whole town is behind and needs desperately for jobs and to grow tourism opportunities with Europe.</p> <p>As this is such a crucial decision and as the council itself has the absolute 'golden' opportunity, having hit the casino Large Casino jackpot, and the almost unbelievable space of the Marina site central positioning coming at the same time, I'm very, very, no extremely worried that councillors do not really understand the great responsibility that they have in making what will either destroy or 'make' the resort. I've already heard the excuses of the credit crunch and the disruption of the seafront during Marina site works, these are both total red herrings – the credit crunch effects every site and we can all live through a couple of years of building to get the right scheme in the centre of our seafront.</p> <p>The council has a very heavy responsibility and the opportunity of a life time, which if they get wrong, will very quickly – quicker than they can possibly imagine kill off the heritage of a hundred years. If you need any more detailed info call me. Make sure they all get to see this letter, if you can't show the council I can send them and all officers a</p>	<p>No</p> <p>No</p> <p>No</p>	<p>members with conflicts of interest.</p> <p>Comment on location</p> <p>Comment only</p> <p>Comment only</p>
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3	The Fire Authority	I can confirm this Fire Authority has no objections to this draft document. However, we would need to be consulted on planning applications for fire service access and water supplies for fighting purposes, as well as needing to be consulted on building regulation applications in the normal way.	No	Comment only
4	Planning	<p>My comments are as follows:-</p> <p>Para 4.20 (4.20.1 and 4.20.2): the locations are quite specific – “Great Yarmouth Town Centre” and “Great Yarmouth Seafront” but are not defined in any way. An applicant is expected to demonstrate what they are likely to bring in terms of benefits to the Borough but only in relation to two very specific areas.</p> <p>It might be better to add at 4.20.3 “The Borough” but specifically to qualify the town centre and seafront as meaning an area within 1km or 1.5km of the town centre and seafront. This will, for example, serve benefits to be offered for South Yarmouth which the current wording would not facilitate.</p> <p>My other concern is Appendix 4. The “likely effects of (the) application on employment and regeneration in the Borough” ought to be qualified by the words “and within a radius of 1km or 1.5km of the application site”.</p> <p>With “Design and location” add to bullet point “Building(s) of distinction or exemplar design.</p>	<p>Yes</p> <p>No</p> <p>Yes</p>	<p>Policy has been amended</p> <p>Benefits to be judged in broad way. Criteria accounts for employment and regeneration near to site.</p> <p>Included in criteria</p>

		<p>For the locational bullet points add the words “or ‘increase’ to ‘potential loss” in the second bullet point.</p> <p>A final bullet point could be added which requires the identification of “social, environmental and economic benefits to local residents and the local business community.</p>	<p>Yes</p> <p>Yes</p>	<p>Included in criteria</p> <p>Included in criteria</p>
5	Norman Ward on behalf of START	<p>At a meeting of START (St Andrews Riverside Triangle) for members of the public on March 17th the Casino was discussed. 35 members of the public took part and the following is a summary of the views expressed. The three documents on the Great Yarmouth Council website were available for people to consult. The Report for the Borough Council by Mr R Wingate on the Edge was not seen by these members of the general public and was not mentioned. It addresses points raised at this meeting.</p> <p>The debate focussed on the Principles that apply in determining the granting of a Casino Premises Licence. The members of the public, many of whom had read press reports etc, posed a number of general and specific questions.</p> <p>It was made clear that Albert Jones, of the Edge, had building approval. In the course of the debate comment was made about several of the features of this concept and these will become clear below. There has been press coverage of two other sites, the Marina and the Town Centre concept. It was pointed out that no developer had yet expressed interest in the Golden Mile site.</p> <p>It was interesting that there was no support for the Marina and Town Centre sites from reading press coverage. One of the reasons given for not supporting a Golden Mile or Town Centre approach was the</p>	<p>No</p> <p>No</p> <p>Yes</p>	<p>Comment only</p> <p>Comment only</p> <p>Criteria amended to include</p>

	<p>incompatibility of mixing a 'family' and 'young people' area with what was presumed to be a different clientele. A major point being made was that development on the Golden Mile would certainly affect present facilities such as swimming. The Town Centre site would mean replacing existing facilities. The arguments put forward in the local press in recent weeks by Peter Jay were discussed. So, the discussion began to focus around the Edge site and whether it could fulfil the requirements of the licensing principles.</p>		<p>location, design &amp; layout under protection of children\ vulnerable. Criteria includes potential loss to existing facilities.</p>
	<p>4.19.1 – Protection of children and other vulnerable people from harm The conclusion was that the site beyond the Pleasure Beach was ideal in that, while part of the tourist area, it was not easily accessible for the 'casual' tourist. There was discussion about how children and 'vulnerable people' would gain access. There were questions about admission to the complex. Particular questions were asked about who would have entry to the 18 lanes bowling. The conclusion was that this aspect would be well supervised.</p>	Yes	<p>Criteria amended to include location, design &amp; layout under protection of children\ vulnerable.</p>
	<p>4.19.2 Source of crime and disorder. Issues raised here included what additional policing, at cost to rate payers, might be needed. The comments seemed to mainly be about street issues. There was an assumption that security inside would be rigorous. There was an assumption that the multi storey car park would resolve local parking issues.</p>	Yes	<p>Criteria amended to include participation in initiatives. CCTV, security already covered in criteria</p>
	<p>4.19.3 Fair gambling. Assumption was that legislation apply.</p>	No	<p>Comment only</p>
	<p>4.19.4 Likely effect on an application on employment and regeneration in the Borough The idea of several hundred jobs, some at a 'high'</p>	Yes	<p>Community benefits already</p>

		<p>level, appealed to all. There was discussion on a number of fronts. For example, housing policy in the borough needs to take into account issues other than social housing. It was questioned whether there was a policy to have appropriate housing in the neighbourhood of the casino. This development, and the historic monument area, ought to have a plan to stimulate a 'community' in the area.</p> <p>It was seen that such a prestige development, plus the new port, would have major regeneration consequences for the area. Questions were:</p> <p>asked whether the possibility of a third river crossing would feature in the wider plans e.g. a park and ride near the casino to cater for both the port, the casino and the town. There was discussion about the port and its nearness to the casino. It was noted by several people how continental casinos are near ports e.g. at the Hague and how this proximity could benefit this project. It was felt that the port would have plenty of space across the peninsula for future development.</p> <p>There was a broad question of who the customers of the new casino might be. Would yachts be coming into Yarmouth and using the facilities? It was assumed that a large percentage of 'punters' would be coming from outside the Borough and there was some discussion about how they would get there by road etc.</p> <p>4.19.5 Design and location</p> <p>Several people had followed in the Press the Monument issue raised by English Heritage and the public was pleased the issue had been resolved. There was much approval of the general design, particularly from those who had looked at the plans There was unanimous and overwhelming support for the location.</p>	<p>No</p> <p>Yes</p> <p>No</p>	<p>identified in criteria. New community criteria added under location.</p> <p>Measures to assist transport infrastructure already included in criteria.</p> <p>Customer profile included in criteria.</p> <p>Comment only</p>
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		<p>4.19.6 Non gambling activities A question asked several times was whether there would be a 'night club'. Told that this was not in the scheme received approval. The idea of a 'proper' multiplex' cinema gained approval. It was interesting how many of these 'Gorleston' residents said they went to Norwich to the cinema. Cinema City got several mentions.</p> <p>4.19.7 Financial contributions There was concern that 'the casino' would be asked by the Council for unreasonable contributions. The public was pleased that the Edge had already agreed to support residents parking as requested by the local residents.</p> <p>A major issue raised was about the time the licensing committee would take to grant a licence. Several used the phrase 'not in my lifetime'. It was noted that e.g. Milton Keynes and Newham will also have large casinos which would abut the Great Yarmouth 'catchment' area. The first in the region to open a large casino would establish a 'catchment' area and gather a clientele and gain a major advantage. There was real concern that the Council appears to be waiting, and hoping, for other developers to bid against the Edge. There was real concern that the Edge project, which appears to be funded and meets the criteria, will lose its backer if there is undue delay. The Borough could then have no coherent fall back position and will have lost the best site. There was a very strong feeling that the Council will simple 'fiddle around' with this licensing procedure and may well lose the advantage it now has of having a viable scheme to consider - and, this time, it could be the first in the field with all the advantages coming with that.</p>	<p>No</p> <p>No</p> <p>No</p>	<p>Criteria already includes provision of leisure facilities</p> <p>Comment only</p> <p>Comment only. However, it should be noted that there has been no undue delay. The licensing process is complicated and it is important to ensure that certain procedures are in place before publishing our intention to issue licences.</p>
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		<p>its current policy and we assume the Authority will be re-consulting on the remainder of the gambling policy in the next few months, as required by section 349 of the Gambling Act 2005.</p> <p><b>4.5</b> It should be made clear that if there is only one applicant following Stage 1, then that applicant will be awarded the casino premise licence and no Stage 2 will be held.</p> <p><b>4.11</b> In addition to the prescribed application form the applicant is also required to deposit a plan of the premises in accordance with the requirements set out in <i>The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulations 2007, Part 2, paragraph 4</i>. This will be the plan that will be annexed to the licence issued to the successful applicant.</p> <p><b>4.12</b> The pro-forma referred to will only apply to the Stage 2 process, as the proceeding paragraph (4.11) confirms, the Authority is not allowed to accept any additional information on than the prescribed application form laid down in the Gambling Act 2005.</p> <p><b>4.18</b> The DCMS Code of Practice, at paragraph 5.3, refers to the fact the procedure that the Authority proposes to follow and the principles they propose to apply shall be included in the licensing policy statement. It</p>	<p></p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>In part</p>	<p>the gambling policy will be consulted upon shortly.</p> <p>Included in policy in paragraph 4.24</p> <p>Included in policy in paragraph 4.12</p> <p>Policy been changed to include info. under stage 2 - paragraph 4.21.1</p> <p>Paragraph 4.18 not amended as it reflects wording</p>
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		<p>is considered that the use of the word “may” and the subsequent amplification in 4.23 do not comply with the Code of Practice, as the process has to be clarified before the invitation applications packs are issued.</p> <p><b>4.21.2</b> Although this information is sought to assist in the process, such a plan will not form part of the licence, as it is only the plan prepared and submitted in accordance with the Premise Licence Regulations, that is annexed to the licence.</p> <p><b>4.21.4</b> In relation the second sentence: There is concern as to whether these items are matters that the Authority can properly take into account, in relation to an application for a Gambling Premises Licence, given that they are matters specific to the Licensing Act 2003.</p> <p><b>4.21.8</b> Clarification is required as to whether this paragraph only applies to an individual or partnership, as clearly in the case of a public company this is not possible. Obviously a company that holds a casino operators licence, and operates more than one casino, will have a proven track record with the Gambling Commission and its predecessor, the Gaming Board of Great Britain, for many years.</p> <p><b>4.21.11</b> Given that the responsible authorities will have been served with notice of the application at the time the licence competition takes place, all requisite consultation will have taken place. It is not clear</p>	<p></p> <p>Yes</p> <p>Yes</p> <p>No</p> <p>Yes</p>	<p>in Code of Practice. Para 4.25 (previously 4.23) amended</p> <p>Clarified in policy</p> <p>Removed from policy</p> <p>Would expect company to produce some form of reference on previous experience</p> <p>Clarified in policy</p>
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		<p>what the purpose of this paragraph is. Clarification is needed.</p> <p><b>4.21.12 – 4.21.14</b>  The Authority’s attention is drawn to the Gambling Commission’s Licence Conditions and codes of Practice (LCCP) and the conditions imposed upon the operating licence held by casino operators. These require procedures to be put in place in relation the issues highlighted in these paragraphs.</p> <p><b>4.21.14</b>  The Authority may wish to consider accreditation secured by operators in relation to social responsibility, such as Gamcare.</p> <p><b>4.23, 4.28 and 4.29</b>  Rank notes the intention on the part of the licensing authority to appoint an advisory panel (referred to elsewhere within the draft policy as an “evaluation panel”). We also note the intended functions of that panel. It would assist were you to explain the statutory basis upon which this panel will be constituted and perform its functions since it is clearly desirable to ensure that such a panel has a proper and lawful basis. If such an explanation can be provided, we believe it to be essential that the policy spells out more clearly the respective disciplines (including areas of expertise) covered by the panel, whether any consultation process is proposed in relation to membership of the panel and what processes and procedures will be put in place to ensure that the panel exercises its functions in a fair and transparent manner.</p> <p>We believe this clarification to be a fundamental issue since it appears to depart from our previous understanding of the licensing</p>	<p>Comment noted</p> <p>No</p> <p>Yes</p>	<p>Clarified on policy</p> <p>Would be considered under criteria</p> <p>Policy amended &amp; renumbered – now included at 4.25, 4.26 &amp; 4.27. Panel members and terms of reference will be published in application pack.</p>
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		<p>process and, in order to comply with Section 5 of the DCMS Code of Practice, we feel that the written remit (referred to in 4.23 of the policy) and the precise functions of the panel should be set out as soon as possible, given the apparent significant of the panel in the second-stage of the procedure. We would like to reserve the right to comment further once the abovementioned explanation and information have been provided.</p> <p><b>4.24</b> Given the volume of information that will be required in any competition it is anticipated that the presentation of Stage 2 applications will take some considerable time and re-assurance is sort that there will be no time limit on presentations.</p>	Yes	Included in policy paragraph 4.31
7	RPS Planning & Development Ltd.	<p>Our client, Pleasure and Leisure Corporation plc (owners of Great Yarmouth Pleasure Beach and the applicant for 'The Edge' leisure development adjacent to the amusement park) thanks you for the opportunity to comment on Great Yarmouth Borough Council's proposed amendments to the 'Statement of Licensing Principles' (SLP). We also welcomed the opportunity to listen to how you propose to take forward the licensing process at the Council's workshop on 23 March 2009. We make the following comments below on the proposed amendments.</p> <p><b>Code of Practice</b> Government guidance on the General Principles to govern the casino premises licensing procedure is set out in the 'Code of Practice' issued by the Department for Culture, Media and Sport in February 2008, and based upon provisions set out in the Gambling Act 2005 (the 2005 Act). Importantly, it states in Paragraph 3.2 that there are</p>	No	Comment
			No	Comment



	<p>following being awarded a casino premise licence – i.e. in the event that the Authority must issue a Provisional Statement (PS) instead of a full premise licences. We set out in our comments on Paragraph 4.31 that any PS should have a time-limit attached to it, so as to encourage the winning applicant to commence their development as soon as possible and to ensure that benefits from that development flow as soon as possible after the licence has been issued.</p> <p><b>Paragraph 4.16</b></p> <p>This states that applicants will e required to “<i>state the benefits</i> “ of their applications; however, it does not specifically state what the ‘criteria ‘ is for evaluating the benefits in this paragraph (we assume these to be as set out in Paragraph 4.19 but this is not explicit). If this is the case, we therefore request that reference is made to Paragraph 4.19 in this paragraph in the interests of clarity.</p> <p><b>Paragraph 4.17</b></p> <p>We again note that it states that the available licence will be granted to the application which will result in the ‘greatest benefit’; however, it does not specify how this will be assessed. As such, in the interests of clarity, in the same manner as our comments above, this paragraph should refer to the criteria listed Paragraph 4.19 and we therefore request that reference is made.</p> <p><b>Paragraph 4.18</b></p> <p>We acknowledge that the 2005 Act and the Code of Practice allows for the Licensing Authority to engage in discussions/negotiations to</p>	<p>Yes</p> <p>Yes</p>	<p>Policy amended</p> <p>Policy amended</p>
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		<p>Practice. Indeed, we would argue that the Council Regeneration Department's promotion of the Council-owned Marina Centre site for redevelopment to developers, and the deals arising from this promotion (including proposals for casinos), would be a specific example of this. The assessment of greatest benefit should only be an assessment of the criteria set out in Paragraph 4.19 as proposed, i.e. the benefits of the proposal itself or any other benefits offered by the casino operator, and would not include a financial gain to the Council from the sale of a property or other property-related agreement. Any other such approach would mean that bidders who are not entering into a property agreement with the Council would be at an immediate disadvantage. This is not in the spirit of the greatest benefit test and the criteria in Paragraph 5.7.4 of the Code of Practice. Notwithstanding our comments above, we therefore suggest the following wording to be inserted at the end of Paragraph 4.19:</p> <p><b><i>“In accordance with Paragraph 3.3 of the Code of Practice, the Licensing Authority will not have regard in any way to any property-related financial gains from either the sale of land the Council owns or any other property-related agreement relating to the site of the casino building.”</i></b></p> <p><b>Paragraph 4.20</b></p> <p>Notwithstanding planning considerations in relation to the location of a casino, we appreciate that the Licensing Authority has provisionally taken a view as to where within Great Yarmouth it considers that a casino would be likely to bring the greatest benefits within a licensing context (those two locations being the town centre and seafront). However, the locations listed in the proposed draft amendments are</p>	<p>No</p>	<p>Already included in policy at paragraph 4.8</p>
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		<p>for reasons of clarity, we request that a list of potential departments with which the Authority will consult (and the reasons for consulting – e.g. employment advice) in evaluating applications is inserted as an Appendix to the Statement of Licensing Principles. Along with this, we request that a set of procedures is also attached in the same Appendix to clarify exactly how this would work, and to avoid any potential or perceived conflict between the licensing and planning process, given that most of the departments consulted with will also be involved in evaluating planning applications (or have already been involved in respect of planning application for casino development already submitted/determined).</p> <p><b>Paragraph 4.27</b></p> <p>This paragraph states that officers may be deputed to clarifying bids with applicants, but that it would be <b>“fine-tuning (but not changing)”</b> their bids. However, this appears to potentially conflict with what is stated in Paragraph 4.18 of the proposed amendments, where it states that the Authority <u>may</u> enter into negotiations with the applicants to <b>“refine, expand or alter”</b> their bids. However, we consider that the Authority should be clear about whether it will indeed enter into negotiations with applicants following the submission of bids. We appreciate that it is up to the Authority to decide whether it wishes to engage in discussions/negotiations during Stage 2 as set out in paragraph 5.4.4 of the Code of Practice (although we consider that it would be in the best interests of the Authority to do so in order to maximise the benefits generated); however, our client, and we suspect all other potential applicants, would like clarity on this as it will affect the preparation of their bids. As such, we request the Authority reconsider the wording of this paragraph or Paragraph 4.18</p>	<p>Yes</p>	<p>application pack.</p> <p>Policy amended - now at paragraph 4.31</p>
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		<p>accordingly.</p> <p><b>Paragraph 4.28</b></p> <p>We welcome the opportunity for the client to make representations on the evaluation of the relevant bids by the Evaluation Panel. We consider that this would be a way of making the process as transparent as possible (and thus minimising the risk of a judicial challenge of any outcome).</p> <p><b>Paragraph 4.31</b></p> <p>We consider that the Licensing Authority should be clear that it will be issuing time limits in respect of the PS (as appropriate) as we consider that it would be appropriate to set out now in the Statement of Licensing Principles the exact length of how long the PS will initially be valid. Notwithstanding our comments above regarding the Authority's ability to recommend that planning permission be sought following the awarding of the licence (should it not have planning permission), we consider that without indicating the timeframe for the PS, the Authority may risk losing the benefits in the short-term following the issuing of a licence as the winning applicants may 'dither' on bringing developments forward.</p> <p>This is a common occurrence in the planning system, particularly in relation to contributions derived from Section 106 legal agreements, and thus <u>all</u> planning consents have a time limit. We suggest the same approach is taken in respect of the PS. Indeed, our client understands the urgency of taking immediate advantage of any and all regeneration opportunities in Great Yarmouth as they have been</p>	No	Comment
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	<p>deeply involved in the town since the 1960s. They have thus sought to address planning and other matters in advance of any competition to enable them to press on with the development quickly should they be successful.</p> <p>This will provide certainty to applicants that the Licensing Authority is committed to maximising the benefits derived from any casino-based scheme <b>as soon as practically possible</b>. Furthermore, this would, within the Authority's power, indirectly encourage the applicant to seek planning permission immediately following grant of the PS, without contravening provisions in Section 210 of the 2005 Act.</p> <p>By setting the timeframe for a Provisional Statement immediately, it would not, of course, prevent the Licensing Authority from extending the period (within an appropriate application process) so long as it is justified. It would, however, give applicants clarity that the Authority will be seeking, within all of its powers granted by the 2005 Act and its associated regulations and guidance, the development's progress at the fastest pace possible to secure the regenerative and other benefits as quickly as possible.</p> <p>In this respect, we would ask that the PS's initial timeframe is limited to 5 years from date of issue and request the following sentence replaces the currently drafted sentence in this paragraph:</p> <p><b><i>"Where a Provisional Statement application is successful, the Licensing Authority will initially limit the period of time for which the Statement will have effect to five years, after which point, if it has not been converted into a premise license, it will expire and the Authority will seek alternative applicants. This period may</i></b></p>	<p>No but comments noted</p>	<p>Limiting Provisional Statements already included</p>
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	<p><b><i>be extended if the applicant so applies.”</i></b></p> <p>Within the context of extending a PS, we consider that it is appropriate that the Authority also set out how it would consider any application to extend the Statement’s duration. In this respect, we propose the following new paragraph to be inserted in the Statement after the text we set out above.</p> <p><b><i>“In the case of such an application, the Authority will consider, along with matters set out in Appendix [INSERT NUMBER] of this Statement, the deliverability of the development and its risk of not coming forward at all. In this respect, the applicant will need to sufficiently demonstrate that the development is still deliverable in the immediate-term.”</i></b></p> <p><b>Appendix 4</b></p> <p>In respect of the first criteria (regarding the protection of children), we consider that design/layout of the casino will play an important part in whether children will be protected, particularly in respect of access points, and compliance with other legal requirements (e.g. public views into the gaming areas), etc.</p> <p>In respect of the location of the casino, we consider that it is important to ensure that ‘convenient’ and ‘casual’ gambling opportunities are avoided, which are likely to lead to more problem gambling. This was confirmed during hearings on the regional casino proposed in the (then) Gambling Bill, held by the Joint Select Committee of the Houses of Parliament. Whilst these hearings were in relation to ‘regional’ casinos, we consider that it equally applies to ‘large’</p>	<p>No but comments noted</p>	<p>in policy. However, importance of deliverability has been accepted and policy amended to ensure project will be delivered. Deliverability now given separate criteria.</p>
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	<p>been implemented, ferry users would be able to easily leave the town without entering the town centre or seafront areas, and thus the casino in the right location may well act as a 'gateway' to Great Yarmouth's tourist areas and thus maximise 'casual' overnight stays.</p> <p>We therefore request that a new bullet point related to <b>"leakage/gateway location"</b> is added as a consideration under 'Benefits/Disbenefits'.</p> <p>We look forward to receiving a revised version of the Statement of Licensing Principles incorporating our comments in due course. However, in the meantime, should you have any queries, please do not hesitate to contact me.</p>	No	Criteria already includes the extent to which the development would create an all year round, diverse Tourism /leisure economy
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