Gambling with regeneration:
seaside resort regeneration and casino development

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GAMBLING WITH REGENERATION:
SEASIDE RESORT REGENERATION AND CASINO DEVELOPMENT

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**A thesis submitted in partial fulfilment of the
requirements of the University of Westminster
for the degree of Doctor of Philosophy**

March 2013

ACKNOWLEDGEMENTS

DECLARATION

This thesis is my own work and contains nothing that is the outcome of work done in collaboration with others. It has not been previously submitted, in part or whole, to any other university or institution for any degree, diploma or other qualification.

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March 2013

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Abstract

The United Kingdom's seaside resorts are in decline. This has been addressed by various regeneration strategies. The Gambling Act 2005 threw a potential lifeline to some seaside resorts that wished to utilise casinos as cultural regeneration tools. However, this is a unique example of a regeneration lever that generates new policy processes. This thesis explores the development and passage of the casino regeneration strategy in three seaside resorts: Great Yarmouth, Scarborough and Torbay. All of these resorts had differing cultural and socio-economic contexts. Linking the perceptions of this type of cultural development demanded a specific methodology. Casinos are cultural objects and social spaces. The intersection of the cultural, economic and social demanded an overarching theoretical guide within which these perceptions could be explored. Of particular value was the work of Lefebvre in his core work on *'The Production of Space'* (1991) and du Gay *et al. 'Circuit of Culture'* (1997).

How policymakers, business and community representatives conceived casino spaces was explored through the regulatory environment at the national, regional and local levels of governance. The perception of how casino spaces should be produced to arrive at culturally compatible representations and identities for consumption followed. It was found that the regulatory environment was experimental and confusing to some. However, most interviewees wanted to see large casino complexes developed in their towns. Potential moral, social and cultural hazards were perceived but not to have been fully considered in the government's strategy, however the economic advantages outweighed these. This study argues that further research is required into this contested cultural activity, and the spaces that house that activity once they are built and operating.

Abbreviations

1st East	1st East Regen Company.
AAP	Area Action Plan.
CAP	Casino Advisory Panel.
CLG	Communities and Local Government.
DCLG	Department of Communities and Local Government.
DCMS	Department of Culture Media and Sport.
DTLR	Department for Transport Local Government and the Regions.
EEDA	East of England Development Agency.
EIP	Examination in Public.
ERDF	European Regional Development Fund.
ESF	European Social Fund.
EU	European Union.
GOEE	Government Office of the East of England.
GOYH	Government Office for Yorkshire and Humber.
GYBC	Great Yarmouth Borough Council.
LDF	Local Development Framework.
ODPM	Office of the Deputy Prime Minister.
RDA	Regional Development Agency.
RES	Regional Economic Strategy.
RPG	Regional Planning Guidance.
RSS	Regional Spatial Strategy.
SRP	Scarborough Renaissance Partnership.
SWRDA	South West Regional Development Agency.
TDA	Torbay Development Agency.
YF	Yorkshire Forward.
YNYPU	Yorkshire North and Yorkshire Partnership Unit.

CHAPTER 1

1.1   GAMBLING WITH REGENERATION

The *Gambling Act 2005* (OPSI, 2006) brought a new approach to the licensing and development of casinos in Britain, allowing for the development of casinos in areas requiring regeneration. This regeneration tool is very different from traditional regeneration strategies (schools, health provision, skills training, infrastructure and housing), and allowed for a first wave of eight large and eight small casinos to be developed. The small casino size, which permits 40 gaming tables and 80 slot machines, and the large casino size, which permits 30 gaming tables and 150 slot machines, will dwarf the casinos currently in existence.

Under the 2005 Act, casino developers were required to compete for the new casino licences through local authorities in 16 areas, as defined by the Department of Culture Media and Sport (DCMS) (OPSI, 2006). A flow chart illustrates this process (Diagram 1, p2). In order to ascertain which areas were in need of regeneration and therefore most suitable to test the social impact of the new casinos, a government advisory panel was set up in October 2005 (DCMS, 2004). Social impact was not specifically defined, but the licensing process demanded that gambling be conducted in a fair way, without criminal interference and in circumstances where the young and vulnerable would be protected (DCMS, 2004, OPSI, 2006).

 In January 2008 the Casino Advisory Panel (CAP) advised the Secretary of State at the DCMS of their recommendations. Three of the proposed locations were seaside resorts: Great Yarmouth, Scarborough and Torbay. The *Gambling (Geographical Distribution of Large and Small Casino Premises Licences) Order 2008* (OPSI, 2008a) granted the local authorities in these resorts the power to licence casinos under the 2005 Act – a large casino in Great Yarmouth and a small casino each in Scarborough and Torbay.

Under the new casino development regulations (OPSI, 2006), casino developers are required to apply for a new casino premises licence through a two-stage process. Furthermore, as part of the Act, the new licensing jurisdictions had to create and implement new local gambling licensing policies that allowed for the development of casinos of an appropriate size. Also included in the new local licensing policy was a list of regeneration benefits that authorities were required to identify as part of a new casino development. Local casino premises licences

were to be granted through licensing competitions, the format of which was laid down by central government (DCMS, 2004). As of July 2011, only one licensing competition has been concluded and none of the new casinos has yet been developed.

Diagram 1: Casino Premises Licensing Process.
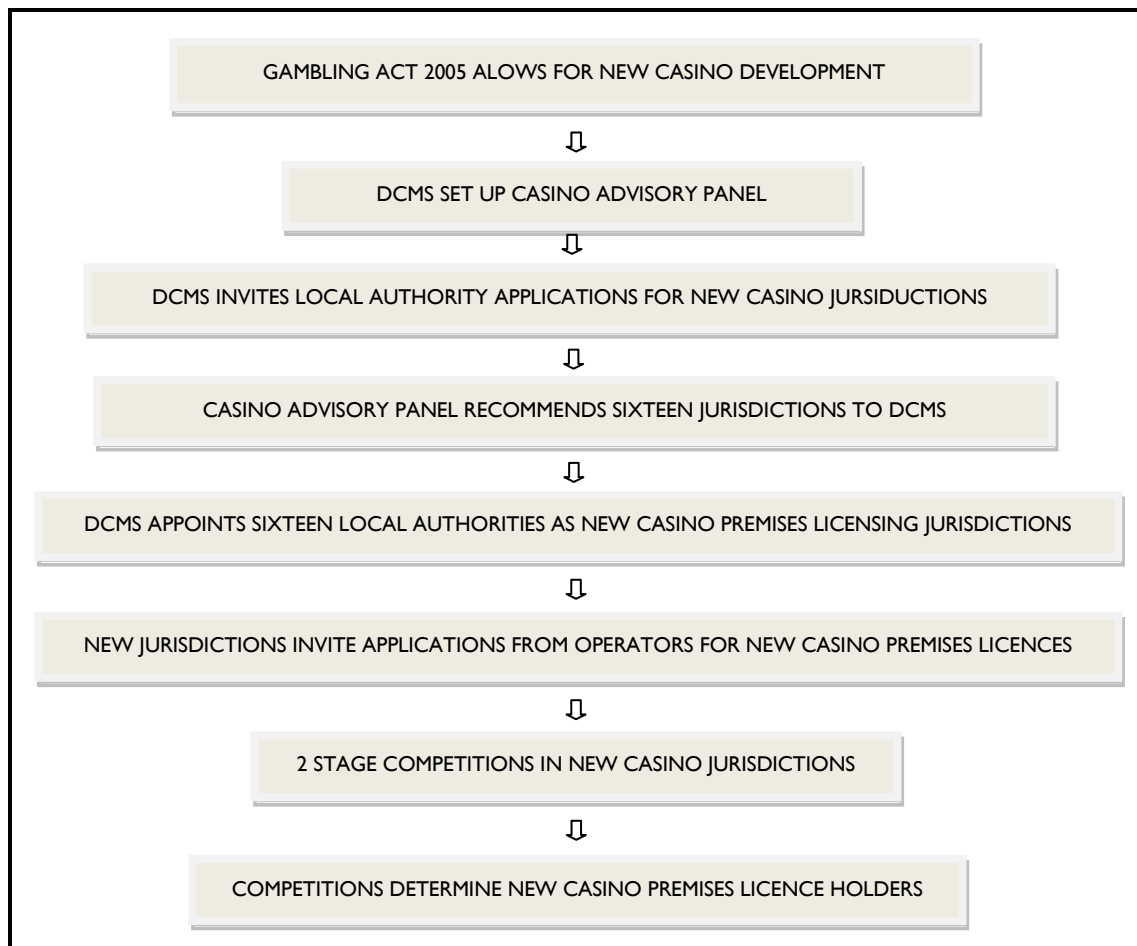
Source: DCMS 2004, 2008., OPSI, 2006.

When the new process began in 2004 (DCMS, 2004), the mix of legal and social regulation with regeneration seemed to offer potential for a new perspective on urban development, one that considered the idea that, as spaces of cultural consumption, casinos could deliver significant regeneration benefits. The potential for new casino developments to become major resort attractions, and the fact that legislation allowed for non-gambling spaces to be incorporated that offered other types of entertainment, was an innovation for many resorts. Critical to this, has to be an understanding of casino development impacts on local resort cultures, and the use of the new cultural policy to regenerate urban centres so that the concept can be 'tested' in these localities. The original research programme for this thesis aimed to include observation and analysis of the issue of social and cultural impact. However, since

the casinos have not been built, the research was re-oriented to concentrate on the process of casino planning, regional and local responses and the imagined impact of casinos on the culture of seaside resorts. This has offered a rich field of research.

1.2 THE STRUCTURE OF THE THESIS

The thesis examines the process of casino planning in each of the three urban seaside resorts studied: Great Yarmouth, Scarborough and Torbay. The insertion of casinos into urban resorts presents challenges to established processes of regeneration in Britain. Furthermore, understanding casino planning demands consideration of the role of cultural artefacts – casinos as tangible forms that house a specific cultural activity – as part of the culture of places designed to produce seaside experiences for consumption. Chapter 2 sets out to provide a contextual background for the thesis. Firstly, a brief history of urban policy since the 1950s explores the politics and ideologies by which successive policies have been framed. This is followed by an exploration of the genesis of regeneration in Britain. An account of the rise and fall of cold-water resorts follows, supplemented by further discussion of the various approaches that have been taken to regenerate such resorts. The chapter ends with an exploration of casinos as resort regeneration tools and the socio-economic impact of this strategy.

Chapter 3 deals with issues related to resorts as places of cultural consumption, as a way in to examining resort restructuring. This is followed by an examination of the various aspects that need to be considered when significant physical and cultural changes are made in urban resort locations. As part of this examination, the attributes of place, the politics of tourist consumption and the way in which partnerships influence place making are discussed, as well as the interactions between cultural regeneration, cultural consumption, destination management and place making. Finally, the chapter recommends a theoretical underpinning to explore policies that facilitate new cultural spaces of consumption as a framework for the research. This incorporates theories on how cultural artefacts can be analysed and how social space is produced.

In Chapter 4 the theory garnered from understanding spaces of cultural consumption is applied, and a theoretical framework for exploring the cultural aspects of casino development is offered. This was made possible through employing elements of the *Circuit of Culture* du Gay *et al.* (1997), and the *Production of Space* (Lefebvre, 1974) theories, to arrive at a framework that casino policy development could be analysed within (Diagram 4, p43). The theoretical framework was used to investigate the thesis statement: **'Casino regeneration creates new policy processes that need to take account of cultural meanings, values and traditions in seaside resorts'**. In order to provide a robust exploration of this statement, appropriate research methods have been developed, and a rationale for the methods used is set out. An exploratory case-study approach based on the three urban resorts, guided the collection and analysis of primary and secondary data related to the research statement. This approach was seen as most suitable for investigating policy processes and their effects on the cultural templates of the resorts.

Chapter 5 explores the opinions and perceptions of national policy makers and policy influencers on casino development and provides a fuller understanding of issues related to casino regeneration and the new gambling legislation. The chapter analyses issues related to casino-led regeneration and casino regulation through national-level White Papers, reports, legislation and guidance on legislation, as well as related policy documents and minutes of meetings. This provides further context for the case studies. In the subsequent case study chapters (Chapters 6, 7, 8), a brief introduction is given to each resort, to provide the reader with an overview of the socio-economic problems and how these have been addressed through regeneration policy and the various agencies responsible. A chronology of selected local regeneration projects with a cultural focus is offered to illustrate the work done in each resort. This context sets the background for interviews with regional policymakers, who provide opinions on a variety of aspects of casino legislation and policy integration, including casino development as a regeneration catalyst and its impact on local resort culture. Local perspectives follow similar themes, but are supplemented by tourist-oriented data and consideration of the social, moral and cultural issues of casino expansion.

Chapter 9 develops a comparative discussion of the points made in the case studies. Firstly, there is a review of policy integration processes at regional and local levels, which compares and contrasts how casino regeneration legislation has been incorporated into wider spatial plans. This is followed by a comparison of views as to where casinos should be located in order to fit best into resort environments. The chapter concludes with a comparison of the moral, social and cultural tensions associated with casino expansion in the three case studies examined.

Chapter 10 further explores issues and concerns relating to the cultural impact of casino expansion. The discussion returns to the earlier theoretical debate concerning conceptions and perceptions of regulating casino development, as well as the production of the representation and identity of casinos. The chapter also emphasises the ways in which cultural policies interact with regeneration, resort image and the perceived impact of casinos. It is evident from the case studies that casino regeneration creates new policy processes, but a considerable weakness of these processes is lack of consideration of the cultural meanings, values and traditions associated with seaside resorts. Finally, the chapter reflects on the exploration of the thesis topic, and discusses varying perceptions of the merits and de-merits of casino regeneration and its cultural effects on host populations. These final comments are supplemented by the author's reflections on how further research might inform casino regeneration policy in future.

CHAPTER 2

2.1 RESORT REGENERATION: ECONOMY, SOCIETY AND PLACE

This chapter locates the idea that casinos might help the regeneration of declining seaside resorts in the wider context of urban regeneration in the UK. Over the past 60 years regeneration strategies have changed, reflecting shifting political ideologies and expectations.

The chapter starts by examining this changing context and focus of policy interventions to regenerating economies, communities and places over the last 60 years. Change is constant through policy shifts in economic, social and cultural emphasis and in the institutions charged with regeneration. For seaside resorts in particular, cultural regeneration has been used as a strategy to improve the prospects of its communities. The chapter moves on to explore these types of resort and their relationship with various forms of cultural and other regeneration intervention. The elements that characterise seaside resorts in terms of their history, character and identity is then examined to gain an understanding of the expectations of casinos. This is followed by an exploration of various issues related to casinos as regeneration tools, and of how such intervention affects economies, societies and places that rely on cultural consumption for their existence.

2.2 URBAN POLICY AND THE EVOLUTION OF REGENERATION IN THE UNITED KINGDOM

The chronology presented here illustrates how urban policy and regeneration has transformed since World War II, through a combination of physical intervention supplemented by economic, social, environmental and cultural policies. The participation of private-sector involvement, market forces and a spatial approach to regeneration is also explored as part of this regeneration equation. It is only by investigating these various dimensions that the framework for regeneration in Britain can be fully understood.

After World War II, and well into the 1950s, urban policy focused on inner-city reconstruction, as well as on the extension and development of new suburban areas through site-specific and localised intervention. These activities were managed and funded at national and then local levels of government, and included some private-sector involvement in the reconstruction process (Roberts, 2000). However, the politics that framed urban policy during this period, which concentrated on providing a new social contract, were conceived at

national level. The Labour party then in power predicated this on the establishment of the welfare state. They promised a universal health infrastructure, new housing and full employment. The new contract was implemented through physical intervention and continued well into the mid-1960s. Again, it addressed site and local spatial scales but saw the emergence of a regional spatial perspective (Atkinson and Moon, 1994, Roberts, 2000). Roberts (2000) views this as a paradigm shift in urban policy, from reconstruction to revitalisation, where private-sector involvement and the development of a regional perspective aimed at shifting inner-city problems – such as unhygienic and overcrowded housing as well as the new problem of inner-city deindustrialisation due to changes in the geography of the regional, national and global market economy – to newly built towns, suburban areas and industrial development areas (Atkinson and Moon, 1994).

Relocating traditional production facilities resulted in a hollowing out of inner cities, which in turn led to a drop in inner-city employment opportunities and an exodus of urban populations. By the mid-1960s, poverty and disadvantage amongst those who had either failed or were unable to move from inner-city areas were visibly apparent. Inspired by urban policy from the US, locally based urban interventions – notably the 'Urban Programme' – were conceived centrally to tackle inner-city issues such as race-based social deprivation and deviant behaviour.[1] The programme provided welfare and health assets, as well as housing, for those in need. However, it was generally recognised that physical measures alone were not enough to solve problems of urban decline without social intervention, a recognition that spelt the demise of the purely physical approach to inner city problems (Atkinson and Moon, 1994, Roberts, 2000).

In the 1970s, the Labour government introduced a Marxist-inspired urban policy, described by Roberts (2000) as renewal, which Atkinson and Moon (1994) saw as a watershed moment for urban policy in Britain. Earlier policies had been grounded in physical intervention, aimed at decentralising industry and moving inner-city populations to new towns and suburbs. Instead, Labour's policy focused on reinvigorating inner cities through industrial, economic, social and technological restructuring, at a time when high inflation and unemployment were major concerns. The white paper *'Policy for the Inner Cities'* in 1977 (Atkinson and Moon,

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[1] The Urban Programme was aimed at addressing areas of special need in inner cities and towns. The programme was intended to provide specific local authority funding to carry out social renewal projects in areas that had high concentrations of immigrants suffering social deprivation. The projects intervened in education, housing, health and welfare (House of Lords, 1968).

1994), addressed the negative impacts of de-industrialisation and the relocation of traditional manufacturing industries, and emphasised regional planning, private-sector engagement and local community empowerment. It also recommended restructuring local economies and societies, and establishing a better balance between employment opportunities and population concentrations (Atkinson and Moon, 1994, Parkinson, 1989, Roberts, 2000). Due to constraints on government resources through high inflation and unemployment, closer links would in future be sought between government and the private sector for financing restructuring programmes (Atkinson and Moon, 1994, Harvey, 1989).

Once again, urban politics in the US offered insights into creating partnerships between the public, private and community sectors for the purposes of urban development. Public servants became responsible for building development partnerships at local level to progress the urban policy agenda, which reflected leadership and vision and unlocked private resources (inward investment and expertise) (Atkinson and Moon, 1994, Houghton and While, 1999).
This ideological shift suited the new-right politics of the newly elected Conservative government in 1979, which called for strategies to create economic demand through greater consumer choice (McGuigan, 2005). At the same time, state support for those in need continued to be constrained by limited government resources (Roberts, 2000).

The Conservative Party's new enterprise culture encouraged the private sector to fund major flagship projects around Britain. The regional planning perspective introduced by Labour was reversed in favour of centralised support and planning for local development and replacement projects, with the state acting as a central facilitator through deregulation, grants, loans and other incentives. Partnership arrangements with the private sector, notably the Urban Development Corporations and Enterprise Zones, proliferated, which, it was thought, would promote economic growth and employment through a 'trickle-down effect' (Atkinson and Moon, 1994, p16). But with the private sector now determining the focus and success of urban development projects, greater emphasis would be placed on profits than on social and environmental considerations.

Although the new strategy helped bridge the gap between private investment and government resources, it also spawned a redevelopment cycle that relied heavily on market forces and the valorisation of property assets (Massey, 1994, Smith, 2003). This ideology lacked any significant mechanism for offsetting the negative social, environmental and cultural impacts

of de-industrialisation, the relocation of labour resources around the globe and inner city poverty in Britain, and at the same time created an environment for under-investment in public services and cultural assets. Despite this, the growth in private sector-sponsored consumer choice also helped spawn a new cultural regeneration. Urban policy would change once again with the election in 1997 of a Labour government.

2.3   NEW LABOUR AND REGENERATION IN BRITAIN

After its election victory in 1997, the government introduced its New Labour ideology. Based on centre-left thinking and termed '*The Third Way*' (Giddens, 1998), this affirmed the notion of social equality and state support for the vulnerable, but reinforced the principle of free enterprise to underpin regional and local economies. Though there would be subsidised opportunities for improving education levels and work skills, in general less emphasis would be placed on state interference and more on personal responsibility in line with neo-liberal notions of 'freedom, choice, the free market, minimal state intervention and the primacy of the individual' (Atkinson and Moon, 1994, p12, Giddens, 1998, McGuigan, 2005).

In terms of urban policy, the new government reversed Conservative centralised planning and revived Labour's 1970s 'watershed moment in the development of urban policy' (Atkinson and Moon, 1994) through advocating community involvement and a bottom-up decision-making model for formulating regional and local urban policies. A stronger emphasis was put on an integrated planning approach to address regeneration by reshuffling central planning responsibilities with the deputy prime minister overseeing Labour's regeneration planning aspirations.[2] The roles of local and regional spheres as regeneration enablers and facilitators were strengthened by this focus and their responsibility to plan from the bottom up. At the same time free-market determination increased social capital through capacity building and environmental protection that were all considered pillars of the new urban policy.

New Labour's approach to regeneration has an important bearing on this research. The *Gambling Act 2005* (OPSI, 2006) demonstrates that Party ideology placed the free market and neo-liberal thinking at the heart of its strategy. By the Act linking regeneration with a

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[2] New Labour changed the central planning landscape significantly over 9 years starting in 1997. The Department of Transport morphed with other central departments to become the Department of Environment Transport and the Regions in 1997. This changed in 2001 when the environment department was separated out and the new Department of Transport Local Government and Regions came into existence. This changed a year later. Transport was separated out and a new department: Office of the Deputy Prime Minister came into existence. It was responsible for local government and regional planning. In May 2006 a new department: Department of Communities and Local Government came into existence and became responsible for local government and regional planning (Glasson and Marshall, 2007).

cultural practice seen by some as socially and morally objectionable, it also gave people the opportunity to exercise their right to gamble in places that the private sector considered profitable to develop. The thesis therefore aims to explore the perceptions of this regeneration policy, particularly in the case-study locations of Great Yarmouth, Scarborough and Torbay. Choices that were made at the national level may not reflect the views of these areas' respective local communities.

It is important firstly to unpick what is meant by regeneration and how New Labour re-focused the regeneration agenda, as this will provide a context for the areas researched and discussed in later chapters. There are many definitions offered of the term 'regeneration'. For example, Lang (2005) talks about the 3Rs, covering physical renewal, urban and rural regeneration and regional development, which represents a holistic vision of long-term improvements in the economic, social, environmental and physical conditions of a location that has experienced negative change (Lang, 2005). Couch and Fraser (2003) note that the term is used to signify 're-growth of economic activity where it has been lost; the restoration of social function where there has been dysfunction, or social inclusion where there has been exclusion, and the restoration of environmental quality or ecological balance where it has been lost' (cited in Lang, 2003, p8). These definitions illustrate that regeneration plans have shifted the urban policy debate to a more spatial understanding, in which economy, society, place and the natural environment are seen as part of an integrated whole (Bianchini, 1993, Couch and Fraser, 2003, Haughton and While, 1999, Lang, 2005, Roberts, 2000, Tewdwr-Jones, 2004), rather than as singular foci for physical, social or economic intervention.

To focus the New Labour regeneration strategy, the Urban Development Companies were re-created in various guises to continue the economic restructuring process, but with more power and control granted to local authorities. Their role was still to facilitate and enable the market to fund intervention, but to look at regeneration more holistically and encourage involvement by the service sector. Regional planning aimed to integrate economic systems with the market and local development plans. Hence in areas where deprivation was rife, urban regeneration was strictly prescribed, but well-off urban areas – less reliant on national funding – were given more leeway to self-prescribe urban and economic development. Community engagement was encouraged, and coalitions were formed to progress local economic and social regeneration (Haughton and While, 1999).

This theme continued to form part of the governance style introduced by New Labour (DCLG, 2006, CLG, 2010, Haughton and While, 1999, Roberts, 2000, Smith, 2003, Walton, 2010). In a wider sense, the restructuring of advanced Western economies that began decades earlier was continuing, while the division of labour also continued its spatial fragmentation (Massey, 1994) as traditional manufacturing relocated elsewhere to take advantage of labour and other cost benefits. As a result of this process, the government sought to encourage the skills and investment needed to support the change from a manufacturing to a service-based economy. This included encouraging local public and private sector cultural provision in inner cities as a way of compensating for the loss of manufacturing jobs. New technologies and communication platforms helped accelerate the change to a service-based economy (Massey, 1994), as did earlier Conservative and the New Labour attempts to integrate cultural policy into regeneration. The *Gambling Act 2005* (OPSI, 2006) and the choice of three seaside resorts to implement it, has contributed to this vision.

Policymakers are aware that restructuring an economy also entails restructuring society. However, the culture of society (Jameson, 1998), its values, beliefs, morals, traditions and myriad interest groups must also be part of the regeneration equation. Building on earlier policy aims, factors such as race, gender, religious belief and sexual orientation, as well as the character and heritage of individual places, were also addressed as part of regeneration (Jameson, 1998, Massey, 1994). But given the contested nature of gambling, such questions also need to be explored in relation to The *Gambling Act 2005* (OPSI, 2006).

As part of what has been termed the 'cultural turn' (Jameson, 1998), understanding different cultural stances and identities has played a major role in the politics of regeneration, and will also influence casino development. Cultural habits are constructed within society through objects and spatial practices (Randviir, 2002), and in the case of casinos have offered a stake in regeneration to people of different cultural identities. However, such products are developed according to market forces, where consumption is individualised through choice. This is a central pillar of the neo-liberal agenda (McGuigan, 2005), where a framework for consumption is provided through aggregating social values, beliefs and traditions. The *Gambling Act 2005* (OPSI, 1996) has attempted to do this based on what the market determines is needed. This thesis is located within this wider debate where market forces determine how the specificities of place and culture are aligned with the development of new cultural products and services.

This phenomenon has not been restricted to the UK. In the US, the private sector has also been engaged in developing entertainment and cultural facilities (Porter, 1995). According to Leonardo (1994) the most important cities in Europe were those where culture and art were developed as part of the socio-economic landscape. But cultural regeneration is about more than just the arts and covers myriad cultural activities, including gambling. To examine the role of cultural practices at seaside resorts and how they might contribute to regeneration, it is therefore necessary to consider the evolution and demise of these locations as places of cultural production and consumption. The activities of these places and how their success is inextricably linked to culture will form the basis of the next discussion (Brown and Walton, 2010, DCLG, 2008, House of Commons, 2007).

2.4 THE RISE AND FALL OF COLD-WATER RESORTS

During the seventeenth and eighteenth centuries, the rich spent the summer season 'taking the waters' and socialising in spa towns such as Bath and Tunbridge, in the south of England, and Harrogate in the north. However, Scarborough was something new. It was the only town located on the coast where mineral waters had been discovered in the seventeenth century and became a regional attraction. Resort towns hosted a season of social gatherings and activities in grand Georgian surroundings for the well-off (Walvin, 1979), while Brighton became fashionable because of its royal patronage. Their success helped create the mode for taking the waters at the seaside (Shields, 1991). Consequently, seaside towns such as Torquay began to replicate the medicinal and social activities of the spa towns. Their popularity was underpinned by the belief that sea and mineral water had curative properties that aided recuperation from common ailments and disease (Shields, 1991, Walton, 1983, Walvin, 1978).

The Industrial Revolution influenced social leisure patterns, with much of the population in Britain taking advantage of technological and social change. As living standards improved, disposable income increased and rail provided new opportunities for travel, so demand rose for fashionable seaside holidays. The characteristics of resorts changed to reflect these new demands, offering entertainment as well as curative experiences. As Shields (1991) explains, this was a re-spatialisation of culture, where cultural spaces were assigned new identities based on practices objectified in architectural forms (for example, promenades and amusement arcades) (Randviir, 2002). This had a positive economic impact and created destination images, like the 'high' culture of Scarborough and Torquay, where opera, theatre

and literature were seen as underpinning social relations. There were also 'low' cultural places like Great Yarmouth, which provided an opportunity for factory workers from the Midlands and London to get away (Shields, 1991). Hence a hierarchy of resort destinations catering to various sectors of society emerged (Farrant, 1987, Goodall, 1992, Stansfield, 1978), along with their characteristic urban forms (piers, promenades, arcades and bathing facilities). Such places offered experiences associated with fun and pleasure, removed from the monotony of the everyday life (Goodall, 1992, Stansfield, 1978, Walton, 1983).

The cultural and socio-economic shift of seaside towns took place over centuries, progressing from centres for traditional coastal industries (ports and fishing) to places for medicinal services, to places of fun and entertainment. Eventually, resorts became places where people uncovered their bodies, different classes mixed together and a carnival atmosphere developed (Shields, 1991). Many of these spaces were seen as liminal, where people would transform or moderate their normal cultural practices and behaviour, and 'get away from it all' (Keller, 1982, Shields, 1991, Stansfield, 1978, Walton, 1983, 2000).

However, the behaviour and cultural pursuits associated with these places also came into conflict with those that lived in them. 'From the 1880s, the expectations of residents who wished to preserve the social tone and image of these towns increasingly diverged from the aims of those whose livelihood depended upon providing tourist attractions' (Farrant, 1987, p137, Walton, 1983). Shields (1991) explains that in Brighton during the nineteenth century many townspeople disapproved of the activities of holiday makers, creating a disjunction between the needs of residents and tourists seeking fun.[3]

The resort phenomenon was not restricted to Britain and Europe. For example, in the US Atlantic City – with Philadelphia as its catchment area – was established in 1852, following the example of Cape May, also situated on the Atlantic seaboard (Stansfield, 1978).[4] The fashion for visiting cold water towns continued well into the twentieth century (Farrant,

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[3] This binary analogy may not be so clear cut. Pearce (2005) refers to Jafari's (1987) work. He suggests that there is a tripartite of cultural relationships at tourism destinations (cited in Pearce, 2005, p35). First, there is the 'tourist culture' that revolves around airports, accommodation, attractions and other tourism facilities; then the 'local culture' that dictates how tourists behave within the holiday setting. Finally there is a 'residual culture' where tourists bring remnants of their culture to the places they visit (Jafari, 1987). Local residents can be tourists within their own communities at moments in time, accessing the 'tourism culture' but at the same time retaining a 'residue' of the local culture they are part of.
[4] Catchment Area: Most seaside resorts in the UK grew in their early years by servicing the adjacent industrial hinterlands closest to them. Leeds, York and Sheffield are the traditional catchment areas for Scarborough (Walton, 1983). The case was similar for the US (Stansfield, 1978).

1987) in both Europe and the US, becoming an established yearly outing (Walton, 2000, Walvin, 1978).

In the 1950s and 60s the success of Britain's cold water resorts was heavily influenced by the development of mass air transport, as new resorts appeared in more exotic coastal destinations in Europe and beyond (Gormsen, 1997). These new places offered the added bonuses of international travel, different cultures, 'guaranteed' sun and warmer water over a longer season (Goodall, 1992, p6) at the expense of cold-water resorts, which gradually saw a decline in visitor numbers. This in turn led to under-investment and social and economic problems for residents (Agarwal, 1997, Goodall, 1992, Stansfield 1978).

Agarwal (1997) describes the demise of the cold-water resort in the context of Butler's (1980) tourism area lifecycle (Diagram 2, p15), which has provided a framework for analysis (Agarwal, 1997, Cooper, 1990, Gale, 2005). The cycle involves six stages. Initially, a potential resort is discovered and *explored* by a small number of visitors. The place has limited facilities and investment is local. The next stage is tourism *involvement* by more of the locals, and includes local and speculative investment to attract a larger number of visitors.

Diagram 2: The Tourist Area Lifecycle.
Adapted from Agarwal, 1997, Butler 1980.
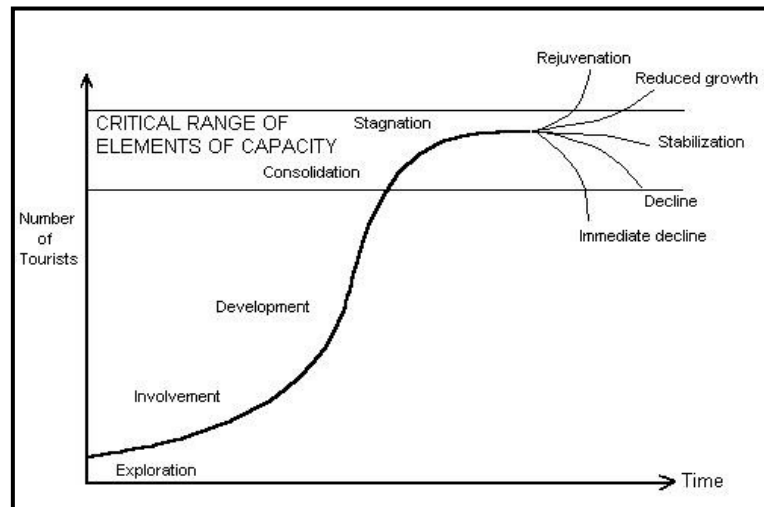
The resort becomes firmly established in the ***development*** stage: tourist facilities are expanded and outside investment increases supply-side capacity, which in turn contributes to tourist growth. In the ***consolidation*** stage, tourism is the major economic driver and in many cases a mono-economy develops. The destination by now has a strong image and tourist service industries are established and require maintenance. Next, resort ***stagnation*** occurs. The resort ceases to grow physically, as do tourist numbers, and experiences image problems due to changes in fashion and dilapidation of the physical fabric. Lastly the ***post-stagnation*** stage consists of five possible scenarios – ***rejuvenation, reduced growth, stabilisation, decline*** or ***immediate decline*** (Agarwal, 1997). It is in the post-stagnation stage, namely decline, that regeneration strategies are needed (Agarwal, 1997, Gale, 2005, Papatheodorou, 2004). This stage of the lifecycle will be explored in the thesis. As part of the exploration of the intersection of regeneration with resort cultures, attention will be paid to how the 'critical range of elements of capacity' takes account of introducing casinos to seaside resorts.

To address the problem of resort decline through casino development, the characteristics of decline need to be fully understood. Central to decline are factors such as the state of repair of the sea-facing infrastructure in primary tourist areas, and mismanagement of the surrounding natural environment (Goodall, 1992). These factors are compounded by lack of service training and product differentiation, negative resort image, global resort diffusion, changes in consumer tastes and lengths of stay, and greater disposable income in an increasingly competitive global tourist market (Agarwal, 1997, Agarwal, 2002, Goodall, 1991, Gordon

and Goodall, 1992, Marsden and Heath, 1999, Papatheodorou, 2004, Smith, 2004, Stansfield, 1978). Together, these ingredients create a critical mass of negative economies of scale, accentuated by the need to maximise revenue and minimise spending on the physical fabric of resorts.

The consequences of decline cut across many facets of life for the residents of cold-water resorts, and include unemployment, increased social problems, higher property turnover rates, replacement of tourist businesses by non-tourist business (Smith, 2004), loss of secondary seasonal income (Bull, 1995), growing inequality and social divisions, seasonal and benefit migration, and crime. Together these conditions have contributed to creating some of the most deprived communities in Britain. (Agarwal and Brunt, 2006).

However, decline has also been affected by more far-reaching economic and social changes. Neo-liberal concepts of greater consumer choice, combined with globalisation, has led to greater dominance of market forces and capital mobility, and the tendency to overlook markets not seen as fashionable (Goodall, 1992, McGuigan, 2005). It is in this environment that government intervention in the form of the *Gambling Act 2005* (OPSI, 2006) is seen as having the potential to encourage much-needed capital investment for reviving seaside resorts.

2.5 APPROACHES TO RESORT REGENERATION

Central to the success of seaside resorts is the perception that they are places of recreation and fun (DCLG, 2010a, Walton, 1983). Whilst visiting seaside resorts is an established cultural practice, so are its sub-practices – bathing, sun-bathing, theatre, music, cabaret and casino attendance (Walvin, 1978, Walton, 1983, 2000).

Many resorts in decline and requiring regeneration (Agarwal, 1997, Cooper, 1990) have been the focus of public policy in the last decade (Agarwal, 1997, 2002). However, initiatives to develop casinos are contested (Reith, 2003), especially in view of those such as Las Vegas's neon-lit casino complex (Venturi *et al*., 1977). Given the effect that the *Gambling Act 2005* (OPSI, 2006) could have on Britain's seaside resorts, taking different perspectives into account and examining the changing government typologies that have produced such initiatives will be crucial. From the 1980s onwards, there was increased expectation of the role the private sector might play in funding regeneration. Political analysis has adopted

'multi-level governance' models to understand the interactions of the public, private and voluntary sectors (Bache and Flinders, 2004), all of which will be involved in regenerating resorts. Understanding casino regulation and its impacts at the regional and local spatial scales is an integral part of this research.

Local, regional and national authorities have formulated a variety of regeneration strategies, from restructuring the physical structure to promoting 'cultural' experiences. At the same time, local marketing groups, European Union (EU) structural funds, the Assisted Areas strategy, the Single Regeneration Budget and neighbourhood renewal schemes have all been mobilised to address economic and social decline and encourage investment in and around resort infrastructure and superstructure (Agarwal, 1997, ETC, 2001, Lang, 2005, Smith, 2004).[5] The *Gambling Act 2005* (OPSI, 2006) aims to encourage such investment, while also protecting the work of social agencies through regulating initiatives seen as socially destructive (Collins, 2003, Reith, 2003).

On the other hand, under New Labour the Department of Communities and Local Government (DCLG) and the DCMS also attempted to address quality-of-life issues by taking a holistic approach to regeneration. The DCLG's white paper, *'Strong and Prosperous Communities'* (DCLG, 2006a), advocated empowering local people and promoting civic ownership through bottom-up planning policies. It was hoped this would result in more socially sustainable forms of democracy and build trust in the structure/agency governance equation. Since the 1990s the DCMS has attempted to align tourism with this policy to promote employment and enhance the well-being of resort residents (Church *et al.*, 2000, DCLG, 2006a).

Collaboration between the DCMS and the DCLG has attempted to underpin a new approach to urban planning based on the view that social and economic regeneration of seaside resorts is interdependent. The *Planning and Compulsory Purchase Act 2004* (OPSI, 2004) was passed to deliver this approach, with community engagement seen as the key to promoting consideration of the specificities of place (Hill and Hupe, 2002, OPSI, 2004, Tewdwr-Jones, 2004). Such considerations included the economy, environment, housing, health,

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[5] Resort superstructure is a term used throughout the thesis to signify the built and natural tourism assets of a seaside resort. This includes beaches, promenades, piers, museums and other resort attractors, but does not include roads, rail, airports and other forms of infrastructure.

communities, skills development and education, transport, culture, tourism and other spatio-cultural issues.

Regional and local plans also covered land use and its intersection with social and economic factors (Tewdwr-Jones, 2004, p561). The legislation required a Core Strategy and Area Action Plans (AAPs) within a Local Development Framework (LDF) linked to regional spatial (RSS) and economic (RES) strategies, an arrangement that Richie and Crouch (2003, p153) describe as an overarching socio-economic 'mega-policy'. Within this structure, tourism would be represented by its own 'detailed discrete' policy. But while the planning system allowed for bespoke plans for individual resorts, a national regeneration policy for seaside towns and resorts has not been forthcoming (House of Commons, 2007).

Up until 2007 only the DCMS had worked to have tourism recognised by all sectors of government (House of Commons, 2007, DCLG, 2008a, CLG, 2010). This department hoped to create a joined-up approach to tourism, in which multidisciplinary planning would enable it to act as a successful driver of regeneration (Agarwal, 2002, Lang, 2005, Marsden and Heath, 1999, Smith, 2004). The issue of resort decline was finally looked at in 2007 by the Communities and Local Government department (CLG) Select Committee, in its report: "Coastal Towns' (House of Commons, 2007). This was despite the fact that initiatives such as business incentives and public/private delivery partnerships for regenerating seaside resorts had been included in tourist policies (Table 1: Tourism and resort policies, reports and initiatives, p19) since the 1990s (Smith, 2004).

Based on these initiatives, it was not surprising that Walton (2010) saw past regeneration policy as concentrating on cities centres and neighbourhoods, and that the individual problems of coastal towns had been subsumed into non-resort-specific regeneration policies (Brown and Walton, 2010) such as *Tomorrows Tourism* (ETC, 2001). However, Agarwal (2002) and Smith (2004) note that New Labour also emphasised the regeneration of local economies through tourism, based on the particular circumstances of each resort, and that local/regional economic and social factors should be harnessed to shape policy (DCLG, 2010a, House of Commons, 2007, Lang, 2006, Smith, 2004).

Table 1: Tourism and resort policies, reports and initiatives.

Title	Year	Facilitator	Detail
PPG21 Tourism	1991	DCMS	Explains economic significance and impact of tourism. Explains how to deal with development plans and development control.
Tomorrow's Tourism	1999	DCMS	Strategy for developing and improving Britain's tourism industry. Identifies the responsibilities of national and local government and the tourism industry. Suggests ways of raising standards.
Sea Changes – Creating World Class Resorts in England	2001	English Tourist Board	Strategy for coordinating national, regional and local government with other agencies and private sector to deliver regeneration plans for seaside resorts.
Coastal Towns Report	2007	House of Commons – Local Government Select Committee on Seaside Towns.	Compiles and analyses evidence on the economic and social problems of seaside towns. Committee recommends that action be taken to address the most common problems and consider specific peculiarities of each town through policy intervention.
Government Response - Coastal Towns Report	2007	DCLG	Notes that 'the government has neglected the needs of coastal towns for too long'.
An Asset and a Challenge. Heritage and Regeneration in English Coastal Towns.	2007	English Heritage	Report on good practice examples of heritage-led regeneration in English coastal towns. Coincides with the Coastal Towns report.
Strategy for Seaside Success	2008	DCLG	Strategy specifically addressed the regeneration of local economies and communities in coastal towns.
Sea Change	Round 1 – 2008 Round 2 - 2010	Commission for Architecture and Built Environment	Uses culture as a strategy for regenerating specific seaside resorts by investing in arts, public spaces, cultural assets and heritage projects. Funding delivered through successful local authority bids.
Regeneration Handbook	2010	Coastal Communities Alliance	Advice for local authorities on how to plan for the regeneration of coastal towns.

Source: Agarwal, 1999, Church *et al*., 2000, CCA, 2010, DCLG, 2007a, 2007b, 2008, 2010a, English Tourism Council, 2001, Commission for Architecture and Built Environment, 2008, 2010, HOC, 2007, Marsden and Heath, 1999, Smith, 2004.

Although casino development is perceived by some as a positive catalyst for regeneration (Collins 2003, Eadington, 1996, 1998, Lee, 2006, Myers, 1991, Smith, 2006, Stansfield, 1978, 1996, Sternlieb and Hughes, 1983), its likely socio-economic impact on the specific attributes and identity of a resort needs to be carefully considered (Collins, 2003., Reith, 2003). At this juncture it is necessary to explore casino-led regeneration in more detail.

2.6   CASINO LED REGENERATION

The *Gambling Act 2005* (OPSI, 2006) offered resorts a wholly new approach to regeneration, and Great Yarmouth, Scarborough, and Torbay have all been successful in becoming casino licensing jurisdictions (OPSI, 2000a). Notably, key features in earlier legislation, such as membership requirements and the 'demand test' by developers to demonstrate need within a specific area, have been dropped (Meirs, 2006, OPSI, 2006). In addition, the Act presented casinos as a solution to the economic and social needs of particular places, and enlisted the market as a mechanism for widening consumer choice in keeping with government ideology.

This is not an uncommon approach, as Atlantic City illustrates (Figure 1, p22). But opinions on the outcomes of this form of regeneration are mixed. The *Gambling Act 2005* (OPSI,

2006) demands that developers exchange the principles of economic and community benefit for a casino premises licence, with premises designated solely and in perpetuity for casino use. Moreover, it is the responsibility of the private sector both to fund regeneration and to provide protection for the vulnerable from the very activity being promoted (McMahon and Lloyd, 2006).

Though some believe casinos can deliver positive economic benefits (Collins 2003, Eadington, 1996, 1998, Lee, 2006, Myers, 1991, Smith, 2006, Stansfield, 1978, 1996, Sternlieb and Hughes, 1983), others have questioned the difficulties of balancing economic with social impacts (Reith, 2003, Sternlieb and Hughes, 1983, Stokowski, 1996, Teske and Sur, 1991). And while many people contest gambling on moral grounds, others see it as recreational and as a matter of individual choice (Archbishop of Canterbury, 2007, Basham and Luik, 2011, Collins, 2003, Eadington, 1996, 1998, Etches, 2011, Miers, 2003, Reith, 2003). Formulating a casino policy that is acceptable to different groups and stakeholders is therefore highly problematic, a debate that this thesis explores within the wider context of New Labour regeneration ideology. As Etches (2011) points out, British casino regulation favours certain values and interests over others. The various development agendas that exist in any location must all be taken into account, as these will have a direct bearing on how that ideology is interpreted (Lang, 2005).

Etches (2011) report is anathema to regeneration planners, who approach spatial and economic development decisions from a rational point of view (Experian, 2011, Sanderson, 2002). In the case of the *Gambling Act 2005* (OPSI, 2006), on the one hand Lee (2006) provides limited socio-economic evidence on which to base decision-making. On the other hand, Etches (2011) posits that more robust evidence was needed to formulate casino policy. As regulation will create a new type of casino development in Britain, evidence has had to be taken from other casino jurisdictions to understand the wider impacts that are likely to result.

2.7   ECONOMIC IMPACTS OF CASINO DEVELOPMENT

New casino regulation is the result of a neo-liberal agenda that aims to provide greater choice for consumers and deliver economic benefits (Eadington, 1998, McGuigan, 2005). In terms of employment, both short-term construction jobs and longer-term casino jobs will be created (Lee, 2006, Blackpool Council, 2006, Collins, 2003, Eadington, 1996, 1998, McMahon and Lloyd, 2006). Additionally, expanded leisure opportunities and recreational add-ons will

stimulate spending by locals and visitors, creating a multiplier effect facilitating secondary employment – casino support industries and other tourism facilities – and income (Bull, 1995, Lee 2006) as well as increasing income and property values (Coles and Shaw, 2006, McMahon and Lloyd, 2006). Other advantages include increased local tax revenue from casinos, which in turn lead to improved services and amenities. (Coles and Shaw, 2006, Lee, 2006, Ritchie and Crouch, 2003, Smith 2004). According to Brown and Kubaseck (1997), tax revenue from Atlantic City exceeded all estimates.

What is also apparent from the literature is that casino development acts as a catalyst for further tourist development, creating a path for resort stabilisation and growth (Butler, 1980, Ritchie and Crouch, 2003).

However, adverse economic impacts of casino development are also recorded. Casino and other service jobs (part-time, late night and seasonal) created may not suit local workers and be taken up by immigrants (Beatty and Fothergill, 2000, Hall Aitken, 2006). In addition, local businesses may be displaced or financially damaged by increased competition, leading to job closures, property voids and a negative effect on resort image (Lee, 2006, Smith, 2004). Furthermore, repatriating casino profits back to developers and casino operators in other geographic areas could cause significant economic leakage. Evidence points to leakages diverting investment away from Atlantic City and reducing economic diversity (Myers, 1991), an effect that grows as local tourist economies accelerate (Bull, 1995). But the multiplier effect can also manifest itself positively. If casino development is planned for as part of a greater regeneration strategy, with public investment, betterment of infrastructure and public fabric, it can lead to more attractive destinations and increased property values though it may also displace communities and create social exclusion (Coles and Shaw, 2006). Figure 1 (p22) reports on some the impacts of casino development in Atlantic City, United States of America (USA).

Figure 1: Casino-led regeneration in Atlantic City.

Atlantic City, United States of America.

According to Collins (2003) Atlantic City is a destination that was encouraged through state legislation to develop casinos as a strategy to rejuvenate its decline as a cold water resort. According to Smith (2006) this has led to a resort which employs up to 50 000 people in the high season in 12 casino operations. It has revitalised the city. This positive view is not echoed by past research carried out in Atlantic City. Teske and Sur's (1991) research on the effects of casinos as a regeneration strategy highlighted that 48 000 new jobs have been created in a city of 37 000, but the envisaged multiplier effects of the strategy with the influx of 33 million visitors a year has not moved beyond the casinos. Many of the casino employees live outside of the city and contribute little to the city directly. The economically depressed areas that existed prior to casino development still exist, although such development was intended to change this. Today, these areas are juxtaposed against the glittering casino complexes.

Whilst this may have been an easy way to rejuvenate the destination the poor were effected (Brown and Kubasek, 1997). Rising land values and rents displaced the vulnerable. Pressure on social services and city centre housing due to property speculation, an increasing population, problem gambling and crime are not reflected in the tax receipts, tourism numbers and employment figures. According to Brown and Kubasek (1997) within eight years of the first casino opening in Atlantic City, land values quadrupled. Whilst the perception is that gaming revenues that are accrued through casino losses contribute to economic growth and tax revenues those losses incurred by non-locals demonstrate a net gain for the local and national economy. However losses incurred by the local population prove to be a net loss for the local economy in reduced spending in other local economic areas (Stansfield, 1996). According to figures from the 1980s, in Atlantic City 40% of gamblers were from New Jersey, the home state, therefore any losses to the casinos there are a net loss to the state itself in terms of tax and business revenues (Sternlieb and Hughes, 1983).

Those universally advocating that the adverse impacts of casinos outweigh the positive economic effects usually site the impacts of excessive gambling. Whilst the National Gambling Impact Study Commission (1999) recognised the libertarian aspect of choice and gaming as a normative practice they also recognized the negative social costs incurred at a gambling destination and that those individuals effected by excessive gambling had become the primary policy concern (Whyte, 2003). This Commission heard testimony about the growing numbers of individuals suffering from problem and pathological gambling, which often results in bankruptcy, crime, suicide, divorce or abuse (National Gambling Impact Study Commission, 1999). But Smith (2006) counters this with the fact that since the first casino opened in 1978 New Jersey State tax revenue from casinos has raised $6.7 Billion for the funding of programmes for the elderly and vulnerable residents. He sited the Casino Reinvestment Development Authority as the regeneration vehicle that has facilitated regeneration benefits for the city. This accounts for the positive economic data and lack of social data.

2.8   SOCIAL IMPACTS OF CASINO DEVELOPMENT

Though casino gambling is accepted by many in society (Archbishop of Canterbury, 2007, Basham and Luik, 2011, Collins, 2003, Eadington, 1996, 1998), an inevitable trade-off occurs between economic benefit and social impact, which is one of the reasons casinos were often situated away from urban populations (Stansfield, 1996). However, the socio-economic trade-off may not be clear cut. In Atlantic City there is a view that gambling has affected the wider social region outside the primary tourist areas regenerated by casino development (Rubenstein, 1984). Hall Aitken (2006) predict negative social impacts for communities in Britain's new casino jurisdictions, including job losses, absenteeism, mental health issues, alcohol and drugs abuse, domestic violence, suicide, and prostitution, all of which will put pressure on public services and funding (Reith, 2003). Issues associated with a rise in problem gambling may therefore compound social exclusion, damage community cohesion and increase vulnerability (Agarwal, 2006, Coles and Shaw, 2006, DCLG, 2006a, Hall Aitken, 2006, Lee, 2006, McMahon and Lloyd, 2006, Lang, 2005, Gonzales, 2003, Stokowski, 1996).

Hall Aitken (2006) concludes that demands on public services might be mitigated if casino regeneration plans are combined with social infrastructure projects (Blackpool, 2005, Hall Aitken, 2006), an approach that takes more into account than just economic benefits. In the USA, for example, ploughing back profits from tribally owned casinos into local Native American Indian reservation communities has reversed deprivation and social costs (Gonzalez, 2003). However, there may be less chance of gambling duty in Britain being ploughed back into local services (McMahon and Lloyd, 2006, Lee 2006).

Neo-liberal ideology dictates that free choice entails responsibility and that individuals should shoulder the consequences of their actions. At the same time, the perceived social impacts of gambling may not materialise. Kang *et al*. (2007) found that the predicted social impacts of casino development were highly exaggerated, and that once the economic benefits have been realised social impacts become less of a concern. However, as Gonzalez (2003) points out, in any community there are likely to be 'winners' as well as 'losers' from casino development (Gonzalez, 2003, Kang *et al.*, 2007).

While it is clear that economic benefits may advantage growth (Lee, 2006), economic leakages and the costs of problem gambling is likely to balance out positive effects (Kang *et*

al., 2007). Economic and tourist policies dictating regeneration will therefore have to deal with a very complex and layered set of issues and to be holistic in approach (MacBeth *et al.*, 2004).

2.9   CONCLUSION

It is questionable whether government has taken account of all the implications of its regeneration strategy or fully comprehended how it will contribute to sustainable communities. It may be that short-term benefits are being accrued to off-set the long term costs of public investment (Eadington, 1998), but a fuller understanding of the cultural repercussions of casino development on English seaside resorts is needed and has yet to be properly researched (Stokowski, 2002).

To explore the 'cultural' impact of casino development requires examination of a number of related factors, including quality of place, history and cultural tradition. Firstly, casino development must be understood in the context of supply-side capacities at the case study resorts, namely casino capacity. In a resort in decline, casino capacity should not exceed that demanded by locals and tourists (Nel and Binns, 2002, Smith, 2004); hence the effect of scrapping the casino 'demand test' needs to be explored too, since empty developments (whether casinos or adult arcades) will impact on the cultural spatiality of resorts.[6] This will offer a way to explore the narratives of resort restructuring and within it the role of a contested activity to aid this process.

How a resort is restructured is explored in the next chapter, in order to provide a context for the expectations of different types of restructuring. The chapter will look at restructuring models and relate these to casino expansion, and investigate understandings of place and the consumption of new cultural spaces. This will shed light on the effect of casino development on the three case studies of Great Yarmouth, Scarborough and Torbay.

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[6] Cultural spatiality is used as term in this work to summarise the way in which cultural practices that subsequently constructed 'on the object level,' through the demarcation and signification of a particular practice are adopted/rejected as part of the cultural tradition of a society (Randviir, 2002, p149). For this thesis, the cultural pursuit of table game gambling is signified by the physical space of a casino building that is clearly demarcated in spatial terms.

CHAPTER 3

3.1   RESTRUCTURING PLACES AND SPACES OF CULTURAL CONSUMPTION

The last chapter provided an overview of the macro issues that need to be considered in relation to casino expansion in Britain's seaside resorts. In the first instance, a brief history of regeneration and its politics as a backdrop for using casinos as regeneration tools was discussed. This was followed by an account of how seaside resorts developed and then fell into decline. The chapter ended with a discussion of the aims of casino regeneration and the economic and social arguments used to support it. It was also noted that the cultural spatiality of casino development and its impact on resorts has not been fully researched. This thesis intends to add to this limited body of knowledge by examining Britain's casino plans and their effects on three specific resorts. Such an examination needs to take account of all the elements of which a resort is made up – its geography, facilities for visitors and locals, and service requirements.

3.2   A RESORT RESTRUCTURING STRATEGY

Agarwal (2002) offers a framework for understanding the restructuring of places of cultural consumption. As a cultural artefact, casinos add a further dimension to the facilities on offer, and understanding their role and impact on local communities will offer new insights into restructuring theory. Agarwal's framework also informs analysis of various perceptions of casino-led regeneration in the case-study locations. The theory is based on four topic areas, all of which are explored here in the context of casino development and its potential impact.

Product reorganisation

It is assumed that the addition of a casino to a resort would bring competitive advantage, by attracting investment, developing a new niche market and creating jobs (Agarwal, 2002). However, alteration of the cultural spatiality of a resort is likely to be contested, and reorganisation will therefore have to take account of the cultural impact of casino regeneration policy.

Labour reorganisation

Restructuring also implies the need for specialist casino skills. Skills transfer would add to economic efficiency and aid restructuring, though there are also dangers attached to labour

reorganisation (Agarwal, 2002, Hall Aitken, 2006). Immigration of specialist casino labour may displace existing non-skilled labour, generating unemployment and social costs (Agarwal, 2002, Agarwal and Brunt, 2006, Beatty and Fothergill, 2004, Hall Aitken, 2006). Furthermore, developers will determine employment opportunities.

Spatial relocation

A restructuring decision would have to be made on the location of a casino. It could provide an addition to a current concentration of leisure investment interests, or be located away from a leisure concentration to decentralise leisure interests. Due to product reorganisation and casino may be located in the primary tourist area of a resort to improve resort image, which in turn would trigger development (McMahon and Lloyd, 2006). While some existing casino-servicing businesses may expand, competing businesses may be displaced (Agarwal, 2002, Coles and Shaw, 2006, Smith, 2004). However, since casinos are contested, they may become the subject of regeneration politics and impacted upon by land use planning, type of usage regulations and the collaborative planning process.

Product transformation (or place transformation)

Casino development will transform the cultural spatiality of a destination as a whole, endowing it with a new image amongst consumers and visitors (Agarwal, 2002, CAP, 2007, Randviir, 2002, Smith, 2004) and the introduction of more diverse, even contested products and services to supplement a casino operation will add to that transformation (Agarwal, 2002, Smith, 2004). Transformation could also bring improvements to resorts' physical and environmental qualities (Agarwal, 2002, CAP 2007), and, indeed, will only succeed if an area is seen as a better place to live, work in and visit as a result. This is achievable if the dynamics of restructuring are understood in the economic, social and cultural context of resorts.

New Labour casino policy allows developers to interpret and conceive place-specific development that will impact on resort restructuring. However, developers may be insensitive to and therefore ignore the particular characteristics of a place (Agarwal and Brunt, 2006, p654). Hence a cultural reading of casino development according to the individual attributes of places is necessary.

3.3   RESORT RESTRUCTURING: PLACEMAKING CONSIDERATIONS

Culturally based regeneration strategies are spatially specific and need to be conceived in terms of a place's distinct attributes (Ritchie and Crouch, 2003). Since culture and economy are inextricably linked, the economic success of a resort will be determined by the mix of facilities on offer (Ritchie and Crouch, 2003, Shields, 1999).

The physical environment acts as a major ingredient for engaging consumers in the traditional seaside holiday (Urry, 2001), and for offering both tangible and intangible experiences that pulls visitors to a destination (Cooper *et al.*, 1998, Dann, 1981). The effect of casinos on the existing cultural mix offered by resorts therefore needs to be understood. Places can be described as having a 'set of meanings' based on experiences, which 'materialise and become real in all sorts of spatial and social practices' (Zukin *et al*., 1998, p629). Similarly, Relph (1976) sees places as areas where social activities and their meanings are transposed onto physical spaces. A holistic understanding of the essence of place therefore involves consideration of multiple cultural, physical, social and even moral and spiritual factors (Avarot, 2002, Massey, 1994), but this essence is based on more than just localised meanings and also includes images that induce visitation found on postcards and in brochures, books and films (Cooper *et al*., 1998, Hannigan, 1998). All these elements are part of the multi-dimensionality that is often referred to as sense of place.

3.4   SENSE OF PLACE

Seaside towns are usually geographically isolated areas where cultural symbols associated with tourism are located within clearly identified leisure spaces (Agnew, 1993). These towns often have a strong maritime past (Smith, 2004), which is endowed with 'deep symbolic, cultural, historical and religious, often contested, meanings for social communities' (Newman and Paasi, 1998, p187). However, a distinction must be made between residential and tourist space. Residents and visitors will derive different meanings and experiences according to the social and other activities they pursue in specific locations (Newman and Paasi, 1998, Massey, 1994, Relph, 1976). Though residents may occasionally be in the same place and at the same time as visitors, they are likely to have a more hybrid experience of place based on their understanding of local culture and their status as residents (Jafari, 1987).

Depending on an individual's set of internal and external references, the values and meanings they derive from cultural experience may also differ widely from that of others. These factors

make up a complex dynamic of place-specific experiences (Jafari, 1987, Molotch *et al.*, 2000, Ritchie and Crouch, 2003, Pearce, 2005, Shaw and Williams, 2004). However, different senses of place may also overlap, so that visitors and residents at times have the same experience (Goonewardena *et al.*, 2008, Jafari, 1987, Pearce, 2005). Understanding the meanings attached to places, and perceptions of the cultural impact of casinos, will highlight important tensions between national, regional and local understandings of cultural practice and casino regeneration policy.

Individual and collective sense of place is also based on a combination of 'use, attentiveness, and emotion' attached to a 'physical setting' (Stokowski, 2002, p369). Along with cultural values and meanings, these feelings become transposed onto a physical landscape to form its cultural spatiality (Randviir, 2002). However, understanding the character of place must be also tempered with the realisation that globalisation and external cultural references can influence personal experience and meaning. (Massey, 1994). For example, will a Las Vegas neon-lit themed casino complement an English seaside resort with a strong maritime past? Will such a transposition reinforce the local identity of place, or be rejected? Insertion of a cultural object associated with a contested activity may create a powerful sense of either belonging or not belonging among residents and visitors.

Different meanings of place can therefore both result from and cause contestation (Massey, 1994), particularly when the pressures of globally homogenised tourist products are seen as incompatible with local culture (Dredge and Jenkins, 2003). For example, Stokowski (1996) cites the way in which, through inadequate local government regulation, the casino industry was able to reconfigure and homogenise place symbols in the casino jurisdictions of Black Hawk and Central City in Colorado, creating conflict amongst residents.

3.5 HERITAGE AND PLACE IDENTITY

Tourist locations project multiple identities that appeal to a wide range of people, and resident and visitor experiences will also vary at particular moments in time (Jafari, 1987, Lefebvre, 1974). Ashworth and Graham (2005) posit that these identities are fluid and dynamic. For example, Brighton was once a fishing village and then a place of medication, before finally becoming a resort that offered entertainment and fun to a new type of visitor (Shields, 1991). These changes would have involved a degree of spatial restructuring. In places where cultural products and pursuits are consumed *in situ* (Agarwal, 2002, Ashworth

and Graham, 2005) a very different regeneration treatment from, say, mining towns, which have suffered decline for different reasons is needed.

Additionally, place identity in resorts is often 'sold' to visitors through contrived representations via marketing materials (Ashworth and Graham, 2005, Avarot, 2002); these representations may differ widely from how a place is perceived by residents. According to Relph (1976), good quality of life only comes from distinctive places, and, as Molotch *et al.* (2000) maintain, this tends to involve an overlap between 'character' (broadly understood as the qualities of a place) and 'tradition' (how that mix of qualities develops over time) and often termed 'heritage', for example, in the case of a seaside promenade.

Ashworth and Graham (2005) take a similar view. They contend that there are numerous heritages in places. These histories – political, social, cultural or economic – also change over time and are 'defined by the needs and demands of our present society' (Ashworth and Graham, 2005, p5) and are 'reproduced from previous related heritages'. These heritages can be constructed in various ways and made up of distinct elements to form a place identity, though that may also result in conflict and power struggles, as noted in the case in Colorado (Stokowski, 1996, du Gay *et al.*, 1997). An important facet of this research will therefore be to assess the role that the politics of tourist consumption play in casino expansion.

3.6   POLITICS OF TOURIST CONSUMPTION

To be successful, resorts need to market themselves. How this is carried out can be problematic. Stokowski (2002) argues that valuable individual and community beliefs and meanings have become embodied in market transactions. Clearly, whoever is formulating policy, and how policy impacts on place, will be an important part of exploring casino regeneration in later chapters.

In the case of tourism planning, power discourses play a role in determining the attractors associated with new configurations of place (Ritchie and Crouch, 2003, Shaw and Williams, 2004). Bourdieu (1977) contends that power structures create identities of place that reinforce those structures (cited in Ashworth and Graham, 2005, p5). When packaging a place for consumption, various elements will be used and others discarded to form an index of 'pull' factors (Dann, 1981). However, marketing a place through selected place attributes can become the subject of conflict between the marketer and marketed, resulting in MacNagghten

and Urry's (1998) 'contested natures' (cited in Stokowski, 2002, p377). Harsh realities, such as deprivation and resort decline, may be ignored along with other negative place meanings and beliefs in favour of more enticing elements (Ashworth and Hartman, 2005, Urry, 1995). This discord can be reinforced at different spatial scales by regional or national marketing and planning authorities (Dredge and Jenkins, 2003).

Given these challenges, Stokowski (2002) calls for a more collaborative approach to placemaking that involves communities (DCLG, 2006a, 2010a) in the interpretation of place meanings, beliefs and symbols. New Labour planning ideology supports this view. This offers the potential for new understandings of the cultural templates of resorts and is especially relevant in terms of casino planning (Stokowski, 2002).

Most authors agree that uniqueness or distinctiveness is the unique selling-point of a place, and that marketers will want to use this to create an identity based on positive meanings and values (Evans, 2003, Stokowski, 2002). A place where there is less friction between groups (Evans, 2003, Stokowski, 2002) will provide an enhanced sense of belonging and hospitality (MacBeth *et al*., 2004). Hence a balance must be struck between what is a 'place' for residents and a 'destination' for visitors, one that can only be attained through collaboration between the various forces involved in influencing change.

3.7   UNDERSTANDING RESORT PLACE-MAKING

While Agarwal's (2002) restructuring framework offers a way of analysing resort regeneration, turning analysis into policy is likely to be a contested process. Many urban analysts stress the importance of both leadership and partnership in managing complex policy challenges and in unlocking markets. Therefore, issues concerning the dynamics of power and how visions are funded and by which organisations are central to this research.

In order to restructure a resort, local innovation, leadership and investment will be required to develop common objectives (DCLG, 2006a, Houghton and While, 1999, Porter, 1995, Relph, 1976, Stokowski, 2002). In Britain this can be achieved through New Labour's collaborative planning process (DCLG, 2008b). However, Hall (1999) contends that place-making partnerships, such as Urban Development Corporations, have very different guises and structures of power.

Regeneration in Britain relies on public and private sector funded partnerships as local delivery vehicles, which has created a framework for implementing urban and economic development strategies (Haughton and While, 1999). However, a coordinated leadership structure may be difficult to establish in seaside resorts where the tourist industry is fragmented between large, medium and small businesses, many of which have limited management expertise and resources (Coles and Shaw, 2006). Furthermore, marketing rather than planning issues may dominate collaboration efforts (Hall, 1999). Holman (2007) observes that in the USA a combination of formal and informal non-collaborative coalitions have been developed by public and private – and sometimes third-sector – political and business stakeholders; through an embedded systemic power base, which could have implications for seaside resorts. This means that the public good can be re-oriented at local level to reflect certain economic sectors such as tourism (Lang, 2005), by using a closed 'old boys' network to reinforce an existing power base and exclude others (Bourdieu, 1977, Holman, 2007).

Tourism planning and destination regeneration requires interconnection between many policy fields and areas of expertise (Hall, 1999), and affects transport, the built and natural environments, the economy and areas such as policing and anti-social behaviour. All need to be tied together in a comprehensive tourist framework under the responsibility of regeneration partnerships dealing with seaside resorts. If an economy depends on tourism as its main economic driver then a holistic approach to regeneration, combined with a flexible approach to leadership coalitions, is essential (Hall, 1999, Lang, 2005).

Holman (2007) posits that coalitions can bring clarity to different geographic, 'cultural, social and political characteristics' (Newman and Thornley, 2005, p46), and therefore they could be applicable to seaside resorts during the casino policy-development life cycle. This approach will be useful in evaluating development coalitions and their influence on and interpretation of local casino development agendas, since these will determine acceptability and success of a casino development and its impact on cultural spatiality (Hall, 1999, Newman and Thornley, 2005, Randviir, 2002).

In terms of cultural regeneration partnerships, experience in the USA again offers some insight. Strom (2008) notes that cultural consumption has become the object of local development policies with narrow coalitions 'represented by groups focused only on the

downtown' (Strom, 2008, p44). Cultural image-making of urban areas is facilitated by what may be referred to, in Bourdieu's words, as 'cultural intermediaries', located 'in all the occupations involving presentation and representation and in all the institutions providing symbolic goods and services' that provide a link between cultural production and consumption (cited in Negus, 2002, p503).

These intermediaries plan for the spatialisation of the local cultural industry and for the symbolic production of local identities and cultural products offered to visitors (Agarwal, 2002, Negus, 2002, Newman and Smith, 2000, Porter, 1995). This has some relevance for our case study resorts, which have over time been re-conceived as places of cultural consumption, endowed with new tangible and intangible symbols and meanings. The latter may rely on unique and distinctive place attributes, including a new casino (Molotch *et al*., 2000). However, not everyone accepts gambling as a cultural activity, nor cultural symbols being conceived by intermediaries. Therefore, contestation may be made on other grounds, such as the spatial alignment of casinos with an existing resort culture. To understand the spatial alignment of casinos with resorts, analysis is needed of how cultural objects that are also social spaces interact with resort culture.

3.8 UNDERSTANDING RESORTS AS SPACES OF CULTURAL PRODUCTION AND CONSUMPTION

The literature has demonstrated that there are two polarised camps of opinion on casino regeneration: those that believe casinos bring socio-economic benefits to a community and those who do not. Regeneration policy that focuses on economic and social benefits often fails to take account of the new meanings and symbols attached to cultural regeneration. The central aim of the *Gambling Act 2005* (OPSI, 2006) as a legal regulation is economic regeneration, but socially regulates for the protection for those liable to suffer the ill effects of gambling. However, centralised economic policy disregards the nuances of local values, meanings and beliefs bound up in contested cultural activities. This has resulted in a vacuum of responsibility by those (governments and businesses) engaged in their development.

The inherited traditions and cultures of seaside resorts in Britain have cultural nuances and quirks that provide their 'pull' factor (Dann, 1981, Molotch *et al*., 2000, Ritchie and Crouch, 2003). Also to be considered are the perceived nuances of places at varying spatial scales that need to be explored to highlight the differing power characteristics bound up in local culture.

By considering these factors, this thesis will enable a greater understanding of the cultural debate as an important facet of regeneration in the context of resort planning and casino regeneration. This is because gambling is a contested activity that, according to Stokowski, (1996) has effects on the cultural templates of places.

Adapting helpful ideas offered by du Gay *et al*. (1997) *Circuit of Culture* and Lefebvre (1974) *Production of Space* theories will aid in creating a broad perspective for this exploration, and will be employed in Chapter 4 to help understand casino development policy and how it has been implemented at regional and local scales.

Writing about the production of social spaces, Lefebvre argues that: 'It is never easy to get back from the object (product or work) to the activity that produced and/or created it' (Lefebvre, 1974, p113). For this thesis, Lefebvre is pointing out that a completed casino or even the entire tourist superstructure at a resort is a social space that forms its own meanings over time (Newman and Paasi, 1998, Schmid *et al*., 2008). This process will be partly derived from the history, character and traditions inherent in each resort, as well as from the cultural intermediaries who conceive new spaces and the external influences of globalisation and homogenisation (Massey, 1994).

It is important to fully understand Lefebvre's treatise, since it offers an analytic approach to territorialised (space) social processes (society – residents and visitors) (Lefebvre, 1974). This can be helpful for exploring the complex cultural spatiality of casino development. Lefebvre (1974) *Production of Space* elaborates two parallel but distinct dialectic moments in the production of space. The first moment refers to 'perceived', 'conceived' and 'lived' space, which is expressed semiotically in terms of language, symbols and their meanings. The second moment refers to 'spatial practice', 'representations of space' and 'spaces of representation', which is expressed phenomenologically in terms of spatial experiences. These two experiences are dynamic and interrelated. Kingma (2008) provides a useful starting point for Lefebvre's theory of dialectic analysis.

In her study on the nature of gambling places as spaces of entertainment and their impact on human relationships, Kingma (2008) advocates a spatial approach based on Lefebvre's dialectic:

- Spatial practice: the production of space suitable for various social configurations, e.g. perception of the casino as a functional social space, to gamble or be entertained in by those that use it;
- Representations of space: 'conceived spaces' are those negotiated by planners, developers and other cultural intermediaries based on their perceptions of what those spaces should be, e.g. a casino designed through planning policies, designs and drawings, and its physical realisation;
- Spaces of representation: the meanings of space within social imagery, based on the association of a subject – gambling – and an object – casino, as a 'lived space', e.g. the look, feel and function of the casino artefact, from exterior structure to interior décor and facilities, whose meanings are based on the perceptions of consumers.

Kingma's understanding of Lefebvre in terms of developing casino spaces is useful, but more detail is required to unpick the change in cultural spatiality produced by introducing an object associated with a contested activity. In the case of British casino development, it would be best to start where the new wave of casinos began. As discussed in Chapter 1, regulation governing casino development was passed at national level, and set out three conditions. Firstly, age requirement for entry, which acts as a restriction on 'spatial practice'. Secondly, the parameters of the scale of casino spaces. Thirdly, casinos had to be sited in areas requiring regeneration. Though further regulation was permitted at local level, regulation had to be implemented within an overall national framework. At all levels policymakers have sought to conceive and regulate casinos as spaces pertaining to gambling as a lived experience.

In design terms, architects and designers are also governed by regulations when drawing plans for casino spaces (Schmid, 2008, Milgrom, 2008). These plans must allow for the 'conceived' symbolism of the casino as a space for gambling. This demands further understanding of the semiotic and phenomenological aspects of Lefebvre's (1974) model.

According to Schmid *et al.* (2008), unpicking the semiotic and phenomenological relationships in Lefebvre's *Production of Space* is not an easy task, since it requires understanding the differences between the actions and behaviour of society and the individual. For this work, it will mean looking at, for example, differences between the perception of casinos by the majority living in a seaside resort, and those who oppose the majority view. But according to Schmid *et al.*, (2008) Lefebvre's dialectic is triadic and analysis will need to be supplemented by interpretation of the creative symbols – the casino identity embodied in its design – that represent gambling as a spatial practice.

In order to explore what Harvey describes as 'new artistic and architectural discourses' (1990, p200), the semiotics of casino spaces are important, particularly the contrast between the built form conceived by policymakers, casino developers and designers and what society understands as a casino space. In phenomenological terms, this means looking at how local residents' experiences and perceptions has influenced gambling as a new form of cultural consumption, and individual opposition to what the society sees as acceptable. What form the casino will take, and whether it is socially acceptable, will depend on the identity and meaning attached to it by society. Interpretation involves placing a semiotic unit (the casino as articulated by policymakers, developers and architects) into a system of multiple semiotic units (the fit of a casino into the general identity of a seaside resort), where relationships between the individual unit and the whole can be evaluated in terms of its impact on place (Randviir, 2002).

A major part of the research will focus on 'conceived space' and the perceptions of policymakers, and business and community representatives involved in influencing policy at national, regional and local levels. It is recommended that 'the situational frame is the smallest viable unit of a culture that can be analysed' (Hall, 1976, p129). Therefore, investigating the role of the various agents in casino planning will require a deeper understanding of how society is regulated and of the cultural spatiality of a contested activity such as gambling.

3.9   CASINOS AS CULTURAL ARTEFACTS

Closely related to the idea of conceived and perceived space is that of 'the biography of a cultural artefact' as proposed by du Gay *et al*. (1997, p3). This model is useful for understanding the cultural meanings underlying casino regeneration and how casinos will impact on place, and for understanding unaddressed cultural issues surrounding resort restructuring (Agarwal, 2002, Butler, 1980). In the case-study locations the model will be used to examine the perceptions of those responsible for conceiving cultural spaces, and the public and private partners with economic and social interests in casino regeneration (Haughton and While, 1999, Lefebvre, 1974).

The model is based on a dynamic (with no beginning or end) analysis of five topic areas, which together provide a macro perspective on inserting a cultural artefact such as a casino into a social structure (the national-regional-local regeneration decision-making environment). The model then provides a micro perspective, which explores human agency around the casino as a cultural object. The starting point can be taken from the top of a circle and followed in a clockwise direction (Diagram 3, p36).

Diagram 3: Circuit of Culture.

from Paul Du Gay, Production of Culture/Cultures of Production (London: The Open University), 1997
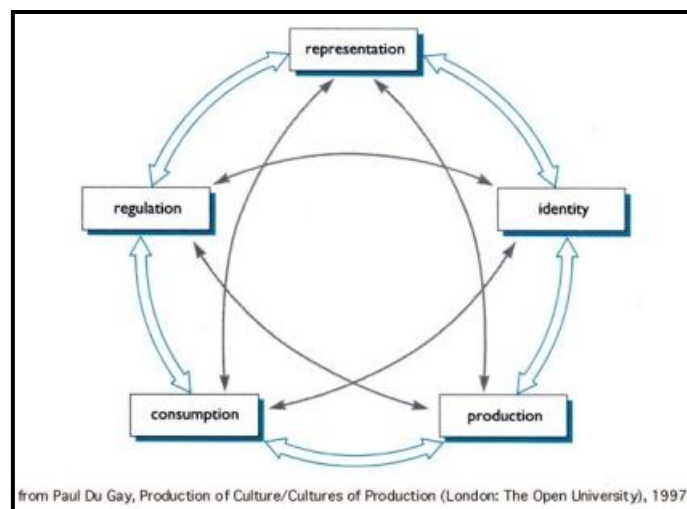
Representation

In order to promote consumption of casinos, an acceptable representation for the activity associated with them therefore needs to be developed (Kingma, 2008, Thompson, 1997). Through the construction of meaning through design, signs and language, a regulated representation of an assembly of elements that relate to the production and consumption of an

artefact should be presented through shared values, norms and meanings. For example, in the US, Australia and some European countries, the cultural activity of casinos has been carefully constructed through symbolic language and signage to avoid moral and social arguments about gambling and to present it purely as a gambling venue that is sometimes veiled as entertainment (Kingma, 2008, Lynch, 1998, Ritzer and Stillman, 2001). Linked to this are discourses about the ethics of gambling and transgressive or deviant activities associated with seaside resorts (Rojek, 1999, Sternlieb and Hughes, 1983). Cultural regeneration through casino development can be seen as amoral and even pathological (Rojek, 1999).

Regulation

Regulation of casinos is differentiated through the symbolic and material in the two spheres – public and private – that regulate the production, consumption, and representation of cultural artefacts (du Gay *et al*., 1997). As a contested activity, gambling is regulated by law, as seen in the licensing provision of the Act. However, as already discussed, regulation is part legal and part social conduct (du Gay *et al*., 1997), since social beliefs, values and meanings (Hall, 1976, Thompson, 1997) set the conventions by which society operates on a daily basis, but may be contested on account of cultural or moral differences.

Identity

Identity is concerned with the potential user of the artefact, who is drawn in by the conceived identity of the representation of a casino space through its physical presence, language and by construction of an acceptable user identity. The artefact must therefore encompass not only the legal and social regulatory regime, but also the represented meanings that create the desire for consumption (Kingma, 2008, Lynch, 1998). Representing the artefact involves choosing words or images that will encourage potential users to identify with the artefact (du Gay *et al*., 1997). This process of signification therefore aims to moderate discourses surrounding casinos while also conforming to social regulation and order (Giddens, 1984, Thompson, 1997).

Production

Production and regulation moderate the conceived identity of an artefact for purposes of consumption. du Gay *et al*. (1997) view the production process as one that must be understood as a culture in its own right, with its own semantics of meanings and language

designed to create an identity and representation of an artefact within the confines of regulatory systems (legal and social).

Consumption

Consumption of an artefact depends on how the production process assigns a representation and identity to a casino artefact so that user of 'lived casino space' perceives the signs, text and language that is produced to desire the experience of the artefact (du Gay *et al*., 1997).

However, how signification is moderated by compliance with recognised rules, standards, morals or traditions. This must also be taken into account as part of the production process, and will be achieved through demographic statistics, types of taste and activity commonalities. As artefacts derive meaning from their relationships with other artefacts – seaside resorts, hotels, beaches etc. – it is important that casinos become associated with positive meanings – entertainment, fun, nights out – rather than with negative ones such as losing money, crime or prostitution (du Gay *et al*., 1997). Therefore, production can veil the negative values of casinos, while positives can be 'designed in' to create more culturally sensitive representations and identities (du Gay *et al*, 1997, Kingma, 2008, Lynch, 1997). The consumption of cultural artefacts must therefore be understood in terms of the successful embedding of cultural policies in seaside resorts, particularly how these would capture the wider cultural meanings attached to places and conform to regulation.

Before moving on the debate, it is important to illustrate how the meanings associated with casino regulation relate to the restructuring framework. Table 2 (p40) summarises the place-making and restructuring elements discussed earlier in this chapter, including the policy areas and significant agencies involved in creating new cultural spaces considered here as the elements that will be explored in the field-work.

3.10   CONCLUSION

In order to provide a contextual backdrop to the thesis, it has been necessary to cover the various debates and planning literature that have helped develop a research framework to explore casino regeneration. In Chapter 2, a brief history of urban policy and regeneration from the 1940s was explored. Regeneration history illustrates the changing focus of political ideologies that have framed urban policy, as well as the contribution of cultural strategies. The chapter then moved on to look at the genesis and demise of cold water resorts, and the need for resort regeneration. This was explored through examining the resort lifecycle and how resorts and their economies may be restructured. The chapter then looked at issues related to casino regeneration and its socio-economic impacts. By the end of the chapter it had become clear that restructuring resorts needs to be understood within the culture of place-making. Chapter 3 considered this issue in the context of the characters and traditions of place and the changing landscape of those involved in place-making.

Very little literature exists on the cultural spatiality of the contested cultural practice of casino-gambling, and consequently a deeper understanding of how place-specific cultures interact with policies that advocate contested cultural activities is needed. As a contribution to this, a proposal for analysing spaces of cultural consumption based on the work of Lefebvre (1974) and du Gay *et al*. (1997) is offered, as well as a framework within which the main themes will be considered in the fieldwork. The latter will include examination of the responses of agencies and other actors engaged in the development of casinos in Great Yarmouth, Scarborough and Torbay.

Table 2: Restructuring Resort Places through Casino Development.

Restructuring Element	Place Attribute Impacted	Spatial Impact Considerations	Elements of Exploration
Product reorganisation	Heritage	Casino identity symbolises a complementarity or conflicts with history of the built fabric.	Regional economic policy fit. Local economic policy fit. Local development partnership strategy and socio-economic fit. Casino developer agenda fit. Casino conceivers' perceptions of policy on economic, spatial, moral and social grounds. Casino supporters' perceptions of policy on economic, spatial, moral and social grounds. Casino objectors' perceptions of policy on economic, spatial, moral and social grounds.
	Traditions & values	Casino identity houses an activity acceptable to residents' traditions and values.	
	Physical setting	Acceptability of overt or covert representation.	
	Functionality	Single or multi-use representation. Inclusive or exclusive.	
	Distinctiveness	Heterogeneous or homogenous in design.	
Labour reorganisation	Heritage	Skills of current workforce.	Regional socio-economic policy fit. Local socio-economic policy fit. Local development partnership strategy on economic and social fit. Casino developer agenda fit.
	Traditions and Values	New skills required over and above traditional skills available.	
	Functionality	Adaptation/training required to reorganise the skills base.	
Spatial relocation	Heritage	Development complements/fits in with the immediate and general locale.	Regional spatial policy fit. Local spatial policy fit. Local development partnership strategy and spatial fit. Casino developer agenda fit. Local casino supporters on economic grounds (re-image resort). Local casino objectors on historic grounds (fit with character and tradition).
	Physical setting	Concentration or decentralisation of development with tourism superstructure.	
Place transformation	Heritage	Complementarity of development as a symbol of change or reinforcement of what already exists.	Regional cultural, spatial and economic policy fit. Local cultural, spatial and economic policy fit. Local development partnership strategy on economic and social fit. Casino developer agenda fit. Casino conceivers' perceptions of policy on cultural, economic, moral and social grounds. Casino supporters' perceptions of policy on cultural, economic, moral and social grounds. Casino objectors' perceptions of policy on cultural, economic, moral and social grounds.
	Traditions and values	Acceptance or non-acceptance of casino and gambling activity.	
	Physical setting	Overall fit into urban morphology	
	Functionality	Additional facilities added to resort.	
	Distinctiveness	Character of casino form as an addition to a resort.	
	Image	Positive or negative perception of the addition of a casino in relation to a resort's heritage, traditions, values, physical setting, functionality and distinctiveness.	

CHAPTER 4

4.1   RESEARCHING THE CULTURAL IN CASINO REGENERATION POLICY

This chapter discusses the rationale for the thesis and proposes ways for exploring the cultural values, meanings and traditions associated with seaside resorts, as well as the implications of building casinos in primary tourist areas. The chapter describes an interview-based research method, based on elements of Lefebvre (1974) and du Gay *et al*. (1997) and their cultural and spatial analysis models. As no casino has yet been built, the thesis will only take account of the casino policy development process and cultural issues attached to it.

The original timetable for delivering casinos has changed due to a number of factors: political concerns over relaxing casino regulation (House of Lords, 2007), choice and legislation of the 16 new casino licensing jurisdictions (OPSI, 2008a), technical consultations on gambling machine types (OPSI, 2009), regulations introduced by the new Gambling Commission (Gambling Commission, 2008) and concerns over licence bidding processes (Scarborough: LPM1, Archer, 2008).[7] Potential casino developers have had to wait for clarification on all these issues, as well as finalisation of the competition process, before they could submit proposals (Doogan, 2009, Richards, 2009).

It is apparent from the literature and the legal review by the committee of 16 jurisdictions that casino development is contested. Little research has been conducted into the subject of casino planning in Britain, and no discussion has taken place in regeneration, urban studies and tourist planning literature of the new cultural meanings attached to urban casinos. Similarly, the impact of casinos on local cultural values, meanings and traditions has not been addressed by government and other policies (CAP, 2007b, DCMS, 2001, DCMS, 2002, Lee, 2006). Only two studies have been undertaken on the impact of casino regulation by the Gambling Act 2005 (Lee, 2006, OPSI, 2006, McMahon and Lloyd, 2006). Lee's report (2006) concentrated on the socio-economic impacts, while McMahon and Lloyd's (2006) looked at the policy in relation to land-use planning. In the USA, most studies that consider the cultural impact of casinos have been conducted in rural areas (Carmichael *et al*., 1996, Carmichael, 2000, Kang *et al*., 2007, Long, 1996, Stokowski, 1996). This thesis therefore aims to

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[7] Fear of litigation caused delays in creating local regulations: In 2008, a committee was formed by planners and licensing officers from the sixteen local casino licensing jurisdictions to discuss a uniform and legally tight local casino licensing policies and license competition process. The reports and minutes from their closed meetings have been unavailable (Scarborough: LPM1).

introduce a different dimension to casino development literature by focusing on how regeneration through a contested activity affects urbanised seaside resorts' culture.

The casino strategy within the *Gambling Act 2005* is an example of a cultural regeneration tool that creates new policy processes relating to the regulation, representation and identities of social spaces, and the consumption of a contested cultural activity. Casino regeneration literature demonstrates that there are two camps of opinion – those that believe casinos bring socio-economic benefits to a community, and those who do not. Historically, regeneration policy has focused on economic and physical intervention, rather than on cultural regeneration and its associated meanings and symbols. The *Gambling Act 2005* was also concerned with economic regeneration along with protection for vulnerable individuals. The aim of this chapter is to develop a theoretical framework for analysing casino development policy at varying spatial scales, using appropriate research methods.

4.2   THEORISING CASINO POLICY DEVELOPMENT

Chapter 1 explained that the *Gambling Act 2005* led to new national and local gambling policies. However, as a driver of regeneration, casino policy needs to be understood in both economic terms and as a contested cultural activity. From Table 1 (p19) the elements of exploration have aided in creating a number of research objectives:

- to understand the implications of casino policy development at national, regional and local levels;
- to understand the impact of regeneration on the culture of resorts and specifically on Great Yarmouth, Scarborough and Torbay;
- to understand how restructuring and rejuvenation narratives evolve around casino regeneration;
- to develop a theoretical framework for understanding casinos as cultural objects and social spaces;
- to develop appropriate methods to understand how resorts and casinos are represented in public policy and by regeneration agencies.

4.3 DEVELOPING AN ANALYTICAL APPROACH

MacNagghten and Urry's (1998) idea of 'contested natures' (cited in Stokowski, 2002, p377) states that interpretations of local tradition and character can lead to conflict between 'place-makers' and residents or visitors. Furthermore, a community's sense of place can be altered by new structures and reconfigured spatial and cultural templates (Molotch *et al.*, 2000, Rojek, 1999, Agarwal, 2002, Stokowski, 1996). To understand this problem, the casino development debate needs to look closely at the intersection of cultural objects and practices.

As discussed in the previous chapter, a broad perspective drawing on the notion of the production of social space together with analysis of cultural artefacts has been developed to allow a richer analysis of the casino regeneration debate. The methodology of this thesis draws on parts of du Gay *et al. Circuit of Culture* (1997) and Lefebvre's (1974) *The Production of Space*, which offer a useful framework for exploring the first three research objectives as set out in Diagram 4.

Diagram 4: Cultural regeneration policy analysis framework.
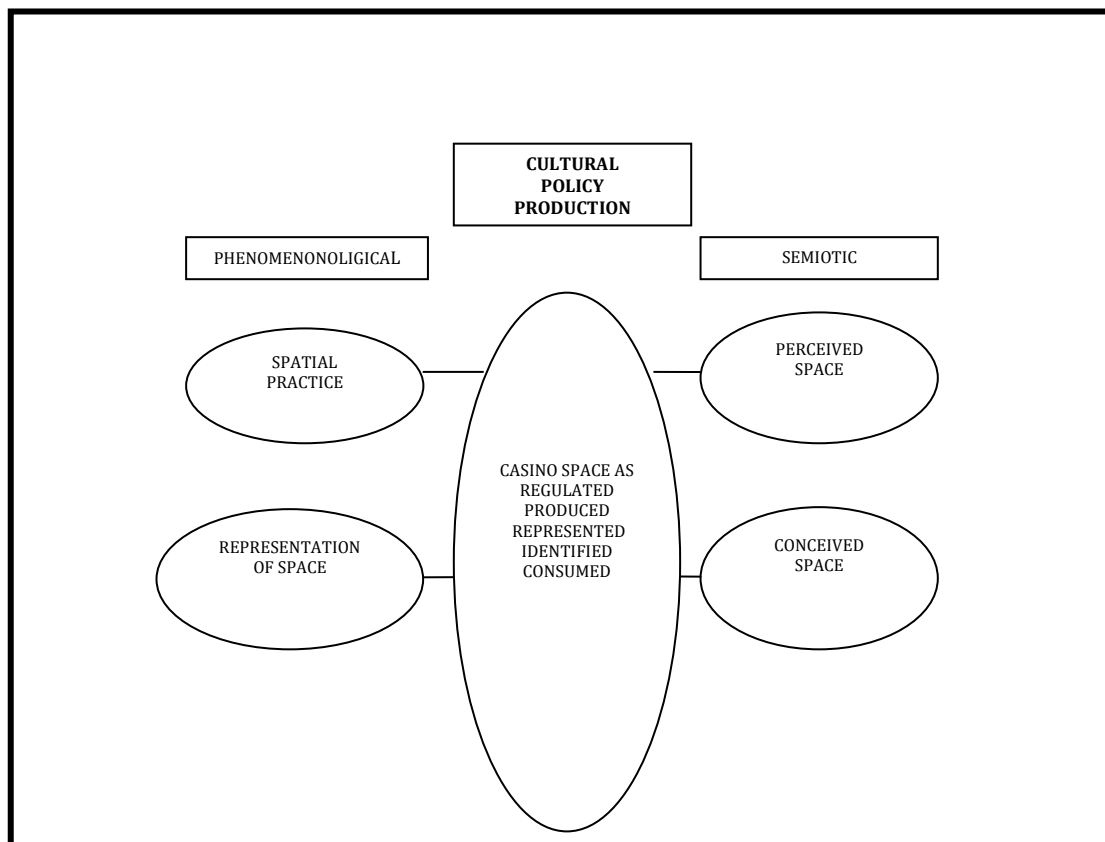
The first objective focuses on regulation (covering legal, social and moral aspects) and on the national, regional and local policies that deal with issues of community, economics, regeneration and tourism planning. The aim here will be to assess how casino regeneration has been integrated into spatial plans and varying spatial scales, and whether it has the potential to either regenerate the case-study resorts or conflict with cultural templates. This will include an examination of how regional casino policy is interpreted at local policy-making level.

For the purposes of the second research objective – how the cultures of regeneration, resorts and casinos interact – analysis will focus on how casinos are conceived and perceived at each of the case-study resorts, particularly in terms of their effect on the specific character and history of place.

The third objective relates to the casino as a cultural object, particularly its legal, social and moral regulation, as well as the image of casinos and the wider contribution they can make to regeneration at each resort.

As explained in Chapter 3, the meanings attached to casinos are governed by a variety of rules, standards, morals, and traditions. However, when these meanings are expressed in policy terms they can be interpreted in different ways and by different organsiations at different spatial scales (Deely, 1990). All this must be taken into account, since what casinos represent at various levels of policy will determine what visitors consume.

Elements of Lefebvre (1974) and du Gay *et al*. (1997) have been used to set out a framework for understanding cultural objects in terms of the overlapping narratives of resort development. While du Gay *et al*. advocate a macro-micro perspective, Lefebvre introduces the 'meso', an intermediate strand that mixes the phenomenological with the semiotic and analyses all dimensions, complementary and antagonistic. Using du Gay *et al*. *Circuit of Culture* as a lens to view the 'meso' analysis brings greater richness to the analysis process (Gottdiener, 1993) and highlights the important cultural issues that need to be considered by cultural policy development. This form of analysis will contribute a better understanding of the 'cultural turn' in policy-making and in relation to understanding contested social practices and the social relations they engender (Jameson, 1991).

To be successful, investigation must also take account of the phenomenology and semiotics of the regulatory environment that frames both the 'perceived space' where casino practices take place, and the 'conceived space' that represents those practices. This conceptual approach enables us to address the following questions:

- how casino spaces are conceived, represented and assigned identities in policy processes;

- how casinos are perceived regionally and locally in terms of spatial practices, such as an influx of gamblers to a place where sun, sea and sand activities dominate;

- how these perceptions interact with the cultural meanings, values and traditions of resorts as places;

- what this means for regenerating seaside resorts.

Various questions need to be answered to determine whether casinos can be a positive catalyst for renewing resorts. Furthermore, will gambling spaces need to be presented as entertainment? Both factors will depend on negotiation between cultural intermediaries (public conceivers of space), developers (private conceivers of space) and whether host communities perceive those conceptions as culturally acceptable.

Casino regeneration creates new policy processes that need to take account of cultural meanings, values and traditions in seaside resorts.

Exploring this statement through the lens of the analysis framework will offer insight into the impact of casinos, and therefore the potential success of this regeneration strategy. In addition, the research aims to identify the policies and organisations that will help deliver success, and assess whether they can deliver an authentic sense of renewal that will be welcomed by residents (Agarwal and Brunt, 2006, Ashworth and Hartman, 2005).

4.4   RESEARCH METHOD

Data for the research was collected from interviews, national, regional and local policy documents and regulations, committee meeting reports and consultation documents, all of which have been analysed (Burton, 2000, Phillips and Pugh, 2005) and combined with firsthand reactions to the case-study resorts. The complexity of issues involved prohibited a quantitative methodology, which would have provided insufficient detail and context (Patton, 2002). Also relevant to policy development, and therefore to the aims of the thesis, are the

views and activities of local politicians, administrative officials and other business, community and interest groups that have a stake in the casino development process.

4.5   INTERPRETING CASINO DEVELOPMENT POLICY

The way in which individuals 'read' and understand casino regulation depends on their interpretation of its meaning and proposals for spatial experiences. The cultural regeneration policy analysis framework illustrated in Diagram 4 (p43) helps to shed light on the different perceptions of casino development at individual resorts and the various factors by which they were influenced. These findings are interpreted in the chapters that follow.

However, the volume of data needed to address the research aims is problematic. For purposes of clarity, the research has been broken down using two elements from Lefebvre's (1974) analytic framework and to aid a deeper understanding of this, du Gay *et al*. *Circuit of Culture* (1997), with greater weight given to 'meso' issues – both public and private – affecting regulation. Though issues such as the production, representation, identity and consumption of casinos have been taken into account, research has also had to focus on the regulatory environment and its cultural impact by looking at 'explanations, relationships, comparisons, predictions, generalisations and theories' linked to casino regeneration (Phillips and Pugh, 2005, p48). Relevant organisations were chosen because of their involvement in local communities, the economy or by administrative activity or political affiliation. Those parties directly involved in policy-making included politicians, and government and partner organisation employees, and were considered as public conceivers of space. Parties involved in policy-making through statutory consultation were either business or community workers, and were considered as perceivers of space. However, an overlap occurred during piloting of Scarborough, in that conceptions of space at local level differed from those at higher (national) level. Incorporating this overlap offered a rich source of data.

Secondary sources, such as local, regional and national policy documents, public consultations reports, committee meetings and legislation, provided the data for studying the production of space from the phenomenological (experiences of the policy process) and semiotic (the language used to articulate policy) standpoints, in line with Lefebvre's (1974) framework. This secondary data was then combined with individual responses, which were subjected to the same analytical process. However, as no casino has been built, there are as yet no *lived* experiences that can be studied. The notions of *perceived* and *conceived* can help

us understand policy according to du Gay *et al*. (1997) five elements, all of which have been employed to aid understanding of the phenomena and meaning of casino development policy. The following themes have been used to unpick the complex data associated with the research:

- national-level conceptions and perceptions of casino regeneration and their influence on regional and local perspectives;
- how casino regulation has been integrated into regional and local spatial, economic and regeneration policies, and its impact on resort regeneration and place-making;
- how casino regulation at national, regional and local levels is perceived by regional and local organisations, and its impact on and compatibility with established resort culture;

These wider themes have been broke up into the investigative areas and subjected to a rigorous analysis, with reference to each case study.

4.6   RESEARCHING CASINO DEVELOPMENT POLICY

The data gathered was in part informed by the author's earlier MA dissertation (2007), *'Coastal resort tourism and leisure development: identifying the variables that contribute to the outcomes of the development process'*, which was socio-economic in focus. It was subsequently felt that the study had failed to take account of the cultural nuances of the development process as an important variable. At the same time, the *Gambling Act 2005* (OPSI, 2006) provided a vehicle for filling a gap in cultural regeneration policy analysis, by examining the three urban resorts (OPSI, 2008a) identified by the legislation.

This project has been conducted in 'real-time', taking note of the progression of national, regional and local casino policy-making and implementation, and its impact on those locations chosen as premises licensing jurisdictions. The latter provided a wide variety of data connected to history and local character, and resident and visitor demographics. The rationale for choosing this method of enquiry will be further explained and justified.

4.7   CASE STUDY APPROACH

This chapter provides the context for the three case studies, which are divided into four distinct sections. The studies begin with information on the resorts and their regeneration aspirations, and how these been addressed. A chronology of selected local cultural

regeneration projects, regional and local spatial plans and economic strategies provide further context.

The second section in each case study considers the integration of casino policy into wider regional economic and spatial polices and how casino regulation may aid resort regeneration. As part of this analysis, sub-regional policy tensions over casino development are also discussed to clarify how cultural factors can influence the values and traditions attached to resorts. The third section covers local policy-making and data to shed light on local policy integration, regeneration and how casinos are conceived and perceived. These discussions provide understanding of the issues examined in the final chapters.

The case-study approach was chosen for two reasons. Firstly, casino development as a regeneration lever is a new phenomenon for Britain. Secondly, the method provided a large quantity of in-depth data. According to Yin (2003) case-study research has certain advantages in addressing questions of 'how' and 'why', and in identifying causal factors (Hajer and Wagener, 2003, Travers, 2001, Yin, 2003) in places with different spatial and cultural qualities. These narratives were unravelled according to the cultural regeneration policy analysis framework illustrated in Diagram 4 (p43), and included how space-specific casino regeneration is understood and conceived by regional and local policies, and how it affects the character and traditions of the three resorts. Combining elements from Lefebvre (1974) and du Gay *et al.* (1997) allowed a deeper understanding of these 'how' and 'why' narratives, as they relate directly to issues surrounding the representation and identities of spaces that are produced to house contested cultural activities.

Due to the number of variables highlighted in the theoretical literature, the case-study method took account of specificity of place to increase the richness and variety of data (Finn *et al.*, 2000). Each response to the interview questions was grouped both thematically and by case study, and then compared and contrasted. The main points that emerged from the comparative study were used as a starting point for analysis and final discussion of the thesis topic (Patton, 2002).

As mentioned in the introduction, the three urban resorts of Great Yarmouth (large casino), Scarborough and Torbay (small casinos) were chosen by government to trial the new casino legislation. It was thought that exploring and contrasting the specific cultural template of each

resort, and relating this to the new spatial configurations laid out by regulation, would provide the best understanding of casinos as a tool for resort regeneration. This reflects Hall's (1976) observation that 'the situational frame' – in this case, urban resorts – 'is the smallest viable unit of a culture that can be analysed' (Hall, 1976, p129). Here, the situational frame was two-fold: casino regulation at the smallest local level – the primary tourist area – and the wider local level of the overall resort. Together, these will illuminate the relationship of a casino to the wider urban environment (Randviir, 2002), particularly the values, morals and practices that are considered acceptable at any moment in time (Lefebvre, 1974) and whether a casino complements or conflicts with those values.

Case-by-case comparison of cultural attitudes to casino development will enable us to understand the implications of casino development beyond the three case studies. At this juncture, it would be helpful to examine the specific characteristics of each resort.

4.8   THE CASE STUDY LOCATIONS

Each of the resorts has a different character and history that has given rise to a place-specific cultural identity. These identities are signified by activities and physical (natural and built) attributes (Molotch *et al*., 2000) that may be common to more than one resort. However, some of their commonalities, along with their physical attributes, have disappeared, as they have become tourist destinations (Butler, 1980). A summary of the three towns' histories is presented in Table 3: Historic timeline for Great Yarmouth, Scarborough and Torbay (p50), to better understand each resorts history. This is followed by three individual figures (Figures 2, 3 and 4, p51-53) that provides a place insight to each resort, and is then followed by two comparative illustrations that highlights each resorts similarities and differences (Figure 5: Traditional industries and tourism development trajectories (p54) and Table 4: Historic place activities and attributes (p55).

Table 3: Historic timeline for Great Yarmouth, Scarborough and Torbay.

Great Yarmouth	Scarborough	Torbay
5th Century AD The Angles found Great Yarmouth. They fished for a living.	*370 The Romans built a signaling station at Scarborough.*	*1086 Villages of Brixham, Cockington, Paignton and St. Marychurch (part of Torbay administrative authority) are recorded in Doomsday Book. Fishing and agriculture are recorded as the main economic activities.*
1086 Great Yarmouth is a little town with a population of several hundred.	*10th Century The Danes found a town at Scarborough. Fishing and maritime activities are the economic mainstay.*	
1209 King John grants Great Yarmouth a trade charter and borough status. The port is flourishing and herring fairs are held.	*1066 The Norwegians burn Scarborough.*	*1196 Torre Abbey founded at village of Torre.*
1297 Ships from Yarmouth fight a naval battle with ships from Kent.	*1136 A castle is built at Scarborough.*	*1294 Royal charter grants Paignton right to hold a market and fair. Agricultural and fi8shing products traded.*
1297 Start of construction on town walls to protect itself from raids by sailors from Kent.	*1163 The town is granted borough status.*	
1396 Completion of town walls with North and South gates.	*1253 The people of Scarborough are granted the right to hold an annual fair.*	*1688 William of Orange lands at Brixham and then marches to London.*
1596 Great Yarmouth is a flourishing town. The Elizabethan House is built.	*1349 The Black Death reaches Scarborough.*	*1774 First Hotel opens.*
1702 A Fishermen's Hospital is built.	*1500 Scarborough is in decline.*	*1799 Napoleonic Wars halt European travel and Torbay benefits. Home of naval Channel Fleet.*
1714 St Georges Church is built.	*1642-1645 During the Civil War Scarborough is held by the Royalists.*	*1830s Development of exclusive residential areas and town facilities: street lights, sewers, water supply.*
1750 Shipbuilding is an important industry in Great Yarmouth.	*1648 Scarborough Castle is besieged. Afterwards it is deliberately damaged.*	
1778 Theatre Royal built.	*1660s Establishment as a spa town. Continues development as a place for 'taking the waters' by the rich.*	*1848 The railway reached Torquay and the grand regency houses in Hesketh Crescent are completed.*
1807 North Gate demolished		
1812 South Gate demolished	*1732 Harbour pier is extended due to maritime traffic.*	*1857 The Bath Saloons open.*
1810 Yarmouth is developing as a seaside resort.	*1735 Original Spa building destroyed by sea storms.*	*1859 Railway reached Paignton.*
1811 St Nicolas hospital for sailors is built.	*1738 Spa rebuilt in grander style then destroyed by an earth quake.*	*1861 Railway reaches Brixham.*
1819 A memorial to Nelson is erected.	*1752 Vincent Pier built in the harbour.*	*1870 New harbour opens making Torquay a fashionable yachting town.*
1821 Customs House opens.	*1805 Improvement Commissioners are given powers to pave, clean and light the streets of Scarborough.*	*1872 Start of horse-drawn bus service between Pagination and Torquay.*
1844 The railway reaches Great Yarmouth.	*1827 Cliff Bridge opens.*	*1878 Opening of Winter Gardens*
1850 Yarmouth is growing rapidly and the herring industry is flourishing.	*1829 The Rotunda Museum opens.*	*1888. Torquay Recreation ground opens.*
	1845 The Railway reaches Scarborough.	*1890 Agatha Christie is born*
1854 Wellington Pier is built.	*1853 A Market Hall is built.*	*1892. Royal charter grants Torquay self governance status. Coat of Arms motto is Salus et Felicitas (Health and Happiness).*
1858 Britannia Pier is built.	*1857 Flood destroys many buildings in Scarborough*	
1903 Hippodrome Circus is built.	*1858 Another Spa building opens*	
1905 Winter Gardens opens.	*1865 Valley Bridge opens.*	*1904 Winter Gardens construction sold to Great Yarmouth.*
1908 The first cinema opens in Great Yarmouth.	*1867 Grand Hotel opens*	
1909 Pleasure Beach opens.	*1880 Current Spa building opens*	*1905 Entire British Naval Fleet reviewed by King George in Tor Bay.*
1927 The Marina is created.	*1904 Trams begin running in the streets of Scarborough.*	*1912 Opening of Torquay Pavilion and adjacent Pleasure Gardens.*
1960's North Sea oil discovered and port becomes a service centre.	*1931 The electric trams stop running. Miniature railway opens.*	

Sources: Gingell, 2007, Farrant, 1987, Great Yarmouth Borough Council, 2011, Greater Yarmouth Tourism, 2011, Hippodrome Circus, 2011, Lambert, 2011, Open Plaques, 2009, Russell, 1960, Rumble, 2011, Scarborough Borough Council, 2011, Scarborough Tourist Accommodation and Information, 2011, Torbay Council, 2011, Walton, 1983, Walton, 2000, Walvin, 1978.

Figure 2: Scarborough.

View of Scarborough Castle and Harbour. © Kind permission N. Fletcher.

Scarborough is situated on the east coast of England in the county of Yorkshire. The old town lies around a natural cove. It is protected by a rocky headland that provided hill top protection for the earliest inhabitants of the town. Henry II built the castle on the headland to protect the surrounding area. The old town developed around the castle walls and down toward the harbour. The road that was built adjacent to the harbour following the line of the bay is known as the Foreshore.

This was and still is the main area of seafront activity and is well connected to the sandy cove suitable for beach activities. This is also the site where the main seafront facilities were first developed, and remains the main focus of tourism today. The modern town lies between 3m – 70m (10 – 230 ft) above sea level, rising steeply northward and westward from the harbour to limestone cliffs.

The identity of the Grand Hotel juxtaposes the Olympia Leisure arcade © Geography Photos.

Scarborough Town Centre © Geography Photos

This is where most of the hotel facilities for tourists were developed in the 18th and 19th centuries. As the town grew in popularity, the North Bay became the new focus of tourism development from the 19th to the 20th Century. A road was developed to run along the coast of the North Bay. It connected the tourism facilities to the town centre that was developed around the rail link to the resorts catchment areas.

Amongst its other tourism facilities, Scarbourgh has a casino. It is located in the original Opera House built in the 1800s. The building has been refurbished and regenerated.

Opera House casino © Google Maps.

Figure 3: Great Yarmouth.

Great Yarmouth sits on a sandy spit between the North Sea and the River Yare, in the county of Norfolk on England's east coast. The southern part of the town's road network acts as a gateway to the northern perimeter of the Norfolk broads. The old town was built on the west side of the spit facing the River Yare. The original town was protected by large walls to the north and south with the River Yare and ocean offering protection from the east and west vistas.

The River Yare and its natural harbour has been an important source of economic activity since the town was granted a royal trading charter in 1206 © Geography Photos.

Old City Walls © Geography Photos

Marine Parade. © Kind permission S. Robinson

As the population grew, the town expanded south, north and east, eventually taking up all the land on the spit. As tourism expanded residential and industrial development took over the west bank of the River Yare. The Victorian and Edwardian tourism district developed from the early 1800s on the east side of the spit due to its sea facing position with the Marine Parade (now referred to as The Golden Mile) as its focus. A road was developed to connect the tourism facilities to the town centre. The classic linear development of sea facing tourism structures that allows easy access to the beach and seafront facilities is a feature of many resorts in Britain.

Amongst the tourism facilities on offer family and adult arcades have proliferated along the Golden Mile. The neo- lit frontages juxtapose the run-down grander buildings that once offered variety and theatre performances that were part of the Victorian and Edwardian seaside offer.

Grosvenor Casino © Geograpahy Photos.

The town also has two casinos. The Mint Casino is located on the first and second floors of a 1980's retail development situated in the town centre and adjacent to the town's market place. The Grosvenor Casino is located in a grand Victorian house on the Golden Mile.

Mint Casino © Kind permission S. Storey.

Figure 4: Torbay.

View into Torquay © Kind permission M. Wordy.

Torbay *is situated on the south coast of England in the county of Devon. The three towns of Brixham, Paignton and Torquay make up the administrative authority of Torbay and are all situated on a large bay named Tor Bay. Torbay is characterised by two rocky headlands on each side of the bay. The area between the headlands is made up of rolling hills and flat spaces, and features long stretches of sandy beaches.*

Paignton seafront accommodation © Kind permission D. Thomas.

The northern headland is much higher and rockier than the southern headland, and is characterised by steep hills and a large cove. This is where the town of Torquay developed. Brixham initially developed around a smaller cove beneath the southern headland. Paignton developed on a small cove on an undulating plain between Brixham and Torquay.

Brixham harbour © Kind permission D. Thomas.

Initially tourism development took place around the harbour in Torquay. This location with its steep hills offered a mild micro-climate suitable for medical tourism and was visited by the well-healed. Paignton developed later as an extension to Torquay attracting a lower-spending visitor. As tourism expanded further, development moved toward and into Brixham. The towns were connected by a road that ran along the coast line, named Marine Drive. Tourism facilities developed alongside the road to Paignton, and later along a coastal road that connected all three towns to create a function resort but made up of three different histories and characters. Amongst the resorts tourism facilities there is a casino. It is located in Torquay in one of the Georgian buildings which are common to the town.

Genting casino © Kind permission F. Hampsey.

Figure 5: Traditional industries and tourism development trajectories.

Great Yarmouth, Scarborough and Torbay *each has a similarity in the genesis of the industries that the peoples of the towns pursued. They were all at one time fishing villages. Great Yarmouth and Scarborough grew because of their fishing and other sea-trading functions into strategic port towns. Because of this, the two towns have been subject to various conflicts since the 13th Century, all the way up until WW2. Fishing as the earliest industry was the mainstay for Great Yarmouth, Brixham and Scarborough, but only the later two towns have kept this industry alive, albeit to a much lesser extent. Whilst fishing was the mainstay for all three resorts up until the 18th century, Great Yarmouth and Scarborough had already established their reputations as boat building and international trade ports. Great Yarmouth's recorded port history goes back to the 13th Century, whilst Scarborough's is even older, having been a trading port since the 10th Century.*

Another aspect that these towns have in common is as places of myriad cultural influences. Scarborough Fair established in 1253 attracted traders and visitors from Britain and Northern Europe. The six week fair's 500 year old history came to an end in 1788. Great Yarmouth's as a major maritime centre on the east coast of England, port, also had a strong naval association. From the 1330s it became the home of the Northern Fleet. Like Scarbourgh – also on the east coast – it was populated by fishermen, sailors and traders. The naval association remained strong. Lord Nelson being born there and the association continued up until WW2. Like Great Yarmouth, Torquay also has its own a naval history, although it does not go as far back. It became an important naval port during the Napoleonic Wars. The Channel Fleet was based in Tor Bay to protect the south coast of England from invasion by the French. Naval facilities in Brixham and naval residences in Torquay were developed to service the fleet and its personnel. Scarborough and Torbay have another historic similarity. That is the tradition of the leisure pursuit of yachting. Torquay in particular, as it was the host town for sailing and other water sports for the 1948 Olympic Games. Both towns are still popular berthing ports. Great Yarmouth does not have the facilities to attract this leisure segment, but the town provides river and deep sea berthing, warehousing and other facilities needed to service North Sea oil rigs and commercial shipping.

The 17th century claim that mineral water had curative properties changed Scarborough's fortunes. In the 1660s Mrs. Ferrar discovered water seeping out of the rocks, near the site of the existing Scarborough Spa in the South Bay. On the back of the discovery Scarborough became a destination for the rich in Yorkshire who could afford to travel. The increasing recognition that mineral salts present in mineral and sea water were medicinal created a fashion for the upper classes initially, and then for the middle classes to 'take the waters'. Although Scarborough's development as a tourism location began much earlier, the trend for 'taking the waters' grew in the 18th Century and saw all three locations developed in terms of offering places for rich and middle class visitors to revive themselves. This mode accelerated well into the 19th Century and all three locations developed significant tourism facilities for the well healed in their regional catchment areas.

In the mid1800s the extension of the railways connected all three resorts to regional urbanised catchment areas. This propelled tourism development at each location. Visitor numbers increased, and saw changes in the demographic of people who arrived at the resorts. Cheap rail tickets opened up the resorts to the masses. In particular, Great Yarmouth attracted workers from factories in London and the Midlands. Scarborough attracted a varied demographic of professionals and workers from Leeds, York and other regional population centre's in Yorkshire. Thomas Cook's seaside packages accelerated the expansion of Scarborough and its visitor facilities well into the 1950s, still attracting the middle and working classes.

Additional tourism facilities developed in the North Bay for the less well-healed. Although Torbay's tourism demographic changed, Torquay in particular attracted a more up-market visitor, and from further afield. This included royalty, celebrities and naval officers and their families. During the 19th Century all the visitors to the resorts were seeking the medicinal properties of sea water, but Torquay in particular had the added attraction of a warmer micro-climate. Naval convalescent homes and a hospital added to the culture of medicinal tourism expansion in Torquay and Paignton. As industrialisation progressed in Victorian and Edwardian times, these resorts saw rapid growth in terms of tourism facilities and a variation in the visitor demographic. However, due to the factors of decline from the 1960s onward, these resorts have experienced significant socio-economic problems and have been the focus of various regeneration interventions including casino regeneration.

Sources: Gingell, 2007., Farrant, 1987., Great Yarmouth Borough Council, 2011., Greater Yarmouth Tourism, 2011., Hippodrome Circus, 2011., Lambert, 2011., Open Plaques, 2009., Russell, 1960., Rumble, 2011., Scarborough Borough Council, 2011., Scarborough Tourist Accommodation and Information, 2011., Torbay Council, 2011., Walton, 1983., Walton, 2000., Walvin, 1978

Table 4: Historic place activities and attributes.

Resort	Theme	Place Activities	Place Attributes
Great Yarmouth	Heritage & Traditions	Fishing, strong naval connection, commercial port, boat building, leisure tourism	Commercial river harbour, ex-boat building industrial complex, ex-fishing industrial complex, protective town walls, rail head, Lord Nelson monument, tourism infrastructure, seafront and promenade, piers, theatre, garden, circus, cinema, accommodations, flat spit surrounded by river and sea, sandy beaches.
	Distinctiveness	Mono-economic: maritime activities then change to reliance on tourism activities. Major trading port connects east England to northern Europe over centuries.	
	Image	Maritime, international maritime connectivity, blue collar worker holiday destination.	

Resort	Theme	Place Activities	Place Attributes
Scarborough	Heritage & Traditions	Fishing, Scarborough Fair, commercial port, boat building, medical tourism, leisure tourism	Protective castle (ruin), leisure harbour, fishing industrial complex, lower old town and seafront and promenade, raised upper town, bridges and cliff lift, rail head, natural spa, tourism infrastructure, pier (North Bay), theatres, gardens and green spaces, two distinct tourism areas (North and South Bay's).
	Distinctiveness	Mono-economic: maritime activities then change to reliance on tourism activities.	
	Image	Maritime, ex-international maritime connectivity, summer fair activities, middle class and blue collar worker destination.	

Resort	Theme	Place Activities	Place Attributes
Torbay	Heritage & Traditions	Fishing and boat building (Brixham), strong naval connection (Torquay), agriculture, medical tourism, leisure tourism.	Brixham: fishing industrial complex, hilly coast. Paignton: undulating/flat plain, family tourism and retiree infrastructure, rail head, pier, promenade, sandy beaches, small harbour, accommodations, zoo, green spaces. Torquay: steep hills, micro-climate, up-market tourism and retiree infrastructure, rail head, large leisure harbour, grand architecture, historic Abbey, grand promenade, theatres, gardens, green spaces.
	Distinctiveness	Mono-economic: maritime activities then change to reliance on tourism activities.	
	Image	Maritime, up-market, family and retiree destination.	

Sources: Gingell, 2007, Farrant, 1987, Great Yarmouth Borough Council, 2011, Greater Yarmouth Tourism, 2011, Hippodrome Circus, 2011, Lambert, 2011, Open Plaques, 2009, Russell, 1960, Rumble, 2011, Scarborough Borough Council, 2011, Scarborough Tourist Accommodation and Information, 2011, Torbay Council, 2011, Walton, 1983, Walton, 2000, Walvin, 1978.

4.9   SECONDARY DATA GATHERING

The research began by exploring those spaces negotiated by planners, developers and other cultural intermediaries on the basis of casino licensing policy as conceived by the Gambling Act 2005. To create a more holistic overview, this data was supplemented by other evidence, such as successful casino-licence jurisdiction applications to the CAP and local consultations at case-study locations.

However, an overview of each destination's character and history was also needed. The preceding section set out secondary data relating to similarities and differences between the case-study resorts in order to provide greater understanding of local nuances.

Each case study also included primary data provided by local authorities to the CAP for consideration as licensing jurisdictions. This information succinctly demonstrates the

physical, economic, social and cultural attributes of casino regeneration as conceived by local politicians, their administrators and regional planners in the initial stages of the policy process. Local casino planning application data was also included in the secondary data, which further aided exploration of casino spaces and their relationship to the licensing jurisdiction applications.

Finn *et al*. (2000) recommend this form of data collection. Here it provided a backdrop to the issues surrounding casino regulation and was analysed to avoid duplication, set parameters for primary information gathering (Finn *et al*., 2000, Yin, 2003) and marry secondary research issues with the literature.

4.10   PRIMARY DATA GATHERING: SEMI-STRUCTURED INTERVIEWS

In order to interpret what is understood as 'cultural' in casino regeneration policy, 'perceived' space was investigated alongside 'conceived' space in interviews at regional and local governance levels (Lefebvre, 1974). The decision to use interviews was made because the case-study approach demanded in-depth data consisting of 'explanations, relationships, comparisons, predictions, generalisations and theories' that would be needed to investigate this new topic area (Patton, 2002, p227). The interview process would be enhanced by focusing on specific questions (Finn *et al*., 2000, Frey and Oishi, 1995), though it would also be semi-structured to allow the researcher to devote more time to specific topics and explore issues raised by participants (Dunn, 2005). This approach delivered a wide range of individual beliefs, perceptions and meanings related to casino development (Schwandt, 2000).

Lefebvre's (1974) theory was employed here to identify groups that had direct or indirect influence over casino regeneration policymaking. Interviews were conducted either face to face or by telephone, depending on where respondents were located. All interviews with regional planners were conducted over the telephone, and all were recorded on a hand-held digital recording device, with notes providing an *aide memoire* to allow cross-referencing and further exploration (Dunn, 2005, Silverman, 2010).

4.11 SAMPLE DESIGN AND EXECUTION

Participants were chosen on account of their involvement in local communities, the economy, policymaking and administration, and were grouped according to whether or not they were responsible for conceiving casino space, as described by policy. Those directly involved in policymaking were politicians and government or partner organisations such as regeneration agencies. The next group made up of business people concerned with the economic focus of casino regulation, who were considered influencers of development regimes but also perceivers of space were interviewed. These people did not directly conceive spatial policy but formed part of an informal development coalition (Holman, 2007), as designed by New Labour policy, to facilitate collaborative planning.

The second group consisted of those who had direct or indirect influence through the same collaborative policy-making mechanism but through their attachment to community, and, in some cases, were members of local strategic partnerships, all of whom tended to focus on the social aspects of regeneration. They were also considered influencers of development but not conceivers of spatial policy. Both groups were treated as units of analysis (Patton, 2002). As pointed out in the literature, leadership in seaside towns can be fragmented between large, medium and small businesses, some of which have very limited management expertise and resources (Coles and Shaw, 2006) for influencing conceptions of space, but who in Lefebvre's (1974) view perceive spaces very differently to those who conceive them. It should be noted that current casino operators in each location and those intending to apply for a casino licence declined to be interviewed, except for an attraction operator in Great Yarmouth who had previously applied for a casino licence.

A total of fifty-one interviews were conducted, each lasting an average of 25 minutes (Appendix 4: Interviewees, p259). 4 interviews were conducted at the national policy-making level, with an additional 16 for Great Yarmouth, 14 for Scarborough and 17 for Torbay carried out at the regional and local levels of policy-making. According to Patton (2002), in order to understand a broad range of experiences, small samples are permissible but need to be 'information-rich'. This richness was achieved through engaging with different interview groups at different spatial scales. Travers (2001) agrees that small samples are adequate to explore how interviewees understand particular phenomena; while Burton (2000) maintains that small samples are cost-efficient and make it easier to collect data from single

respondents. This was done by using a non-probability 'purposeful-sampling' technique (Burton, 2002, Patton, 2002, p230).

The literature helped generate a sense of the different opinions that might be obtained on casino regeneration, which in turn determined the interview groupings. For example, in the initial pilot study it was assumed that politicians, economic and urban planners and business people would be in favour of casino development as a regeneration lever, whereas social workers and community activists would be against it. Added to this, the theoretical framework distinguished between those who conceived spaces (politicians and administrators) and those who perceived them (business people and community workers). Combining and contrasting these two views created sampling criteria based on dissimilar views of casino policymaking (Burton, 2000, Patton, 2002).

When requesting an interview appointment by email, each respondent was made aware of what the research topic covered and the questions they would be asked. Immediately prior to each interview, an explanation was again given about the research topic and what the data would be used for. Each interviewee was told that they would remain anonymous and that the data provided would be held confidentially and only used for the purposes of this research. Each interviewee gave their consent to the interview via a signed consent or the digital recording device.

4.12   INTERVIEW TOPIC GUIDE

Patton (2002) states that the advantage of using a topic guide is that the areas that the researcher needs to explore are included in a framework for understanding complex issues. Issues raised in secondary research, such as how cultural templates change in casino jurisdictions (Stokowski, 1996, 2002), but which needed clarity in terms of the UK experience, were also included in the topic guide. All the issues that needed to be covered in the topic guide were considered in the theoretical framework. For example, Lefebvre's (1974) perceived and conceived space elements were helpful in forming topic issues related to how casino spaces were conceived and processed, while du Gay *et al*. (1997) elements of regulation, production, representation, identity and consumption were used to underpin issues related to producing a new sense of place. These tools helped focus the issues that needed investigation, but also allowed individual understandings and perspectives to emerge (Patton, 2002, Silverman, 2010).

The issues covered in the guide were loose enough to allow the interviewer to press for more clarity on some subjects while adapting the interview to the function or position of the interviewee (Dunn, 2005, Patton, 2002). This was important when asking interviewees questions relating to experience. The guide also allowed a systematic approach to exploring issues that had different meanings for respondents (Dunn, 2005, Patton, 2002, Silverman, 2010). Open-ended questions were ordered as either primary or secondary. Primary questions covered a wider topic area in order to initiate exploration of a particular theme (Dunn, 2005, Patton, 2002) and followed various types – descriptive, opinions and stories – proposed by Dunn (2005). Secondary questions were used to delve deeper into particular topics to uncover greater detail.

4.13   PILOTING THE TOPIC GUIDE

An initial pilot study was carried out in Scarborough, for which the topic guide can be found in Appendix 1: Interview Topic Guide 1 (p253) and included interviews with both regional and local actors. The study was conducted to assess the effectiveness and scope of the subject matter of the topic guide, and to test the data collection method in terms of content and procedure (Yin, 2003). According to Yin, this process is an important feature of the research process as it helps clarify research themes and design. The original sampling criteria were based on the perceived status of interviewees, but after conducting the interviews it was realised that the division of 'for' and 'against' lobbies was too reductive, and a second layer of interviewee, consisting of 'in-betweeners' was added those either directly or indirectly involved in casino development policy (but neither 'for' nor 'against' it); to allow for greater complexity of reactions. The topic guide was then adjusted to reflect these changes, as can be seen in Appendix 2: Interview Topic Guide 2 (p254).

Other improvements were made to the research design. The pilot topic guide was changed after the second interview to focus on local and regional policy processes and policy consultation exercises. The complexities of the various levels of spatial policy were identified and the questions changed to address each spatial scale for the next rounds of interviews. Intersections between the policies of local regeneration, culture, tourism, gambling and other areas in terms of spatial planning were better understood after the pilot and the re-phrasing of questions. By understanding the focus of Scarborough's regeneration projects and their processes, new prompts were developed and more relevant data gathered during the next two

interview rounds. The pilot study also gave the interviewer insight into how to adapt the topic guide to each interviewee, by re-focusing questions according to their role, experiences and understanding of the issues covered. For example, in the first instance, an open-ended descriptive question was asked about the respondent's part in the policy process (Hajer, 2003, Dunn, 2005), to determine how interviewees should be examined about their role. This included a prompt on casino regeneration policymaking to determine whether they had a direct or indirect influence on regeneration in general and on casino regeneration in particular and how they conceived or perceived casino space.

The questions that followed were set to determine the respondent's perceptions of being either a conceiver or a perceiver of casino space and its regulation, representation, identity and compatibility with the resorts. Secondary questions were also used to clarify misunderstandings of primary questions, or to extend a primary question that yielded data not addressed by either the literature or interview topic guide but which brought greater depth and scope to the subject (Dunn, 2005). This was useful for gathering data unique to seaside resorts, cultural regeneration and casinos. Lastly, the methodology developed after the pilot stage was considered appropriate for examining the narratives of casino regulation, including its intersection with regeneration policy and its impact on the character and traditions of seaside resorts.

4.14   THE *FLÂNEUR*

Another interesting observation made during the piloting process was that the researcher became a *flâneur*. Benjamin (2006, p229) describes the *flâneur*'s experience as searching for 'reality' by 'opening one's self up' and having a 'distinct response' to the urban landscape. By this means, the researcher was able to make informal but distinct observations in Scarborough relevant to the research, despite the fact that it was not included in the initial methodology. Indeed, it was only after visiting Scarborough that this primary method was chosen, which would supplement the interviewees and secondary data. Over a period of two days, the researcher had time to wander around Scarborough at various times of the day and evening and observe the spatial and physical character of the town. According to Benjamin (2006), Baudelaire was able to experience life in Paris by walking through the urban landscape and observing the physical and social configurations that make up the urban context. In the case of Scarborough, this aided understanding of where the main tourist footfall area (the primary tourist area) was located.

The researcher's walks also allowed observation of the existing casino in Scarborough and the scale and type of other visitor facilities and attractions, as well as the relation of place and cultural context to the surrounding area. Interviewee perceptions of casinos and how they would impact on the cultural spatiality of the resorts could also be imagined. This informal observation method was used again in Great Yarmouth and Torbay to illuminate cultural perspectives on which sites would be most suited to casino development, as well as the place and cultural references used to achieve planning consents for older planning applications and the types of casinos that may eventually be developed (Appendix 3, p255). This provided an additional insight for the way in which data is analysed in the final chapters.

4.15 DATA ANALYSIS

According to Yin (2003), case-study analysis theory is not well developed and the evidence is difficult to analyse. Therefore, an analytic strategy was developed, with the areas to be analysed divided between secondary and primary sources (Burton, 2002). In the case of secondary data, the content of the documents examined – legislation, policy, minutes of meetings, etc. – were analysed and coded according to thematic analysis (Section 4.3, p43). These themes had a logical correspondence with the research objectives derived from the theoretical framework and literature, and were used to build the section headings under which secondary and primary information was coded. Yin (2003) states that this is the most appropriate strategy to follow for the analysis of case-study data. In this case, the analysis method concentrated attention on how individuals made sense of complex policy fields and cultural expectations.

Interpretation of the thematic data was an important part of the analysis process in order to produce valid findings. Documentary and interview transcription analysis first identified narratives by theme, then linked regeneration policy with the culture of casino development to examine the elements identified as helpful in the approaches of Lefebvre (1974) and du Gay *et al*. The researcher's experiences referred to in the previous section allowed for a richer analysis of the material in terms of understanding interviewees' conceptions and perceptions of the cultural spatiality of casino regeneration (Benjamin, 2006). This analysis was then combined with that of the various policy and other documents that influenced those narratives.

4.16 ASSESSING INTERVIEW RESPONSES

There are some observations to be made about the interview locations. Although some of the local interviews took place at interviewees' places of work, the majority (80%) were held at independent sites within each case study location. These included meeting rooms in a community centre in Great Yarmouth, in an art centre in Scarborough and in a council sponsored business incubation centre in Torquay, all of which provided quiet, uninterrupted environments (Dunn, 2005). In the case of community workers, local authority administrators and business people, it was noted that their responses to sensitive issues were less restricted than those given by respondents interviewed at their work place. It was obvious that the neutral environment allowed interviewees to feel disconnected from their normal locations, which made for greater candour. In many cases, local authority administrators interviewed in independent spaces offered more critical responses detached from institutionalised rhetoric. However, there was less variety by location in the responses of business people and community workers, and most of the politicians interviewed provided similar party-based viewpoints, whether interviewed in independent or institutionalised spaces.

4.17 CONCLUSION

This chapter has outlined a cultural regeneration policy analysis framework, according to which the development of physical spaces housing a contested activity can be explored and investigated. The framework was put together by adapting the theoretical underpinnings of Lefebvre's (1974) *Production of Space* theory and du Gay *et al*. (1997) *Circuit of Culture* discussed in Chapter 3. This framework informed the qualitative research method of using case-studies to unravel the 'how' and 'why' of the policy process narrative. To expand understanding, semi-structured interviews were adapted to each individual's role in the casino development process. The data was then combined with thematically arranged secondary data on the national perspective, which provides a backdrop for Chapter 5 and for the three case-studies discussed in Chapters 6, 7 and 8. These case-studies are compared and contrasted in Chapter 9, and discussed and cross-referenced with the literature in Chapter 10.

CHAPTER 5

5.1   EXPLORING NATIONAL CASINO REGULATION

Beginning with the *Gambling Act 2005*, this chapter outlines a context for the impact of national casino regulation on the case-study resorts. Interviews with parties at national level, who were directly or indirectly involved in designing the Act and the use of casinos as a tool for regeneration provide detail on the thinking behind casino regulation. This data is then explored in the context of the theoretical framework and the conceptual and ideological underpinnings of regeneration. The second part of the chapter outlines the government framework for regeneration, to set the scene for views of regeneration recorded at each resort. The third part introduces some of the issues arising from the competition process for licensing new casinos.

5.2   MODERNISING CASINO REGULATION IN THE UK

The publication of the *Gambling Review Report* in 2001 called for a change of regulation for the UK's casino industry. Negative attitudes to gambling and casinos had changed since the *Gaming Act 1968* (The National Archives, 2011); in line with neo-liberal ideology, the report advocated legislative changes to promote greater consumer choice (DCMS, 2001, DCMS1). The most notable recommendations were for large-scale expansion of casino development, scrapping the demand test (whereby an operator had to prove local demand for a new casino operation), abolishing casino membership and allowing the use of credit cards to pay for gambling (DCMS, 2001). Tessa Jowell, Secretary of State at the DCMS at the time, responded to the report – commonly referred to as the Budd report – with a white paper, *A Safe Bet for Success* (DCMS, 2002). This response included the adoption of many of the recommendations of the Budd report and used it as a consultation framework for a new gambling bill. The paper aimed to modernise casino regulation through reform of the 1968 Act and create a new Gambling Commission responsible for gambling regulation and regulating the licensing of premises. Other notable changes covered the activities casinos could offer, which now included:

- a wide variety of gambling activities, including slot machines with unlimited prize stakes;
- live entertainment and alcohol in gaming areas (DCMS, 2002).

Taking account of new technology (Internet gambling) and changes in social attitudes, the government went some way to agreeing with the Budd recommendations. However, the

government response also expressed concern about the impacts of casino expansion on vulnerable groups and advocated social regulation (DCMS, 2002), to be overseen by the new Gambling Commission. The white paper also suggested that casinos should be developed with a minimum 5000 square foot gaming area to avoid proliferation of small casinos, and that control should be exerted over slot machines (DCMS, 2003).

5.3   REGULATION AND CASINOS

The policy and legislative review process started in 2001, during which the Budd report and the government's response to it (DCMS, 2003) were used as the basis for a draft gambling bill, in which casino expansion was scaled down.[8] In 2003–2004, the bill was presented to and scrutinised by a joint parliamentary committee, before being submitted to parliament in January 2005 (SOL, 2004a) and included most of the recommendations of the government white paper (DCMS, 2002, OPSI, 2006). Most notably, it contained provision for a first wave of new casino development, by allocating licensing jurisdictions for eight regional (resort), eight large and eight small casinos (DCMS, 2004).

The recommendations made by the joint committee reigned in some of the enthusiasm that had been generated by the Budd report and the government's white paper. Casinos were a contentious subject. The joint committee was cautious of the proposed legislation, noting that casino expansion would have a significant impact on the gambling industry. They cited conflicting evidence on many points in the gambling bill from stakeholders who had participated in the legislative process (SOL, 2004a, 2004b).

It is evident that the committee also had reservations about government logic, about the scale of casino expansion and about protecting the young and vulnerable. However, Lord McIntosh of Haringey, Minister for Gambling, took the view that the number of slot machines in small casinos could be restricted, and that regulation governing minimum casino size would prevent proliferation of 'street corner' casinos.[9]

The regeneration benefits that casinos would bring were also contested, as well as 'the extent to which casino development [could act as] an engine of regional regeneration, and how

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[8] Parameters for casinos were set as: Small casinos, with a table gaming area of between 5,000 sq ft and 10,000 sq ft, with a minimum of 20 gaming tables and a maximum of three gaming machines for each table. Large casinos, with a table gaming area of over 10,000 sq ft and an unlimited number of gaming machines provided the casino has more than 40 tables (SOL, 2004a).
[9] The small casino created under the Gambling Act 2005 will dwarf many of current large casinos incorporated under the Gaming Act 1968 by size and table gaming areas.

planning gains will be achieved' (SOL, 2004a, p92). According to Lord McIntosh, 'It is very difficult to know how to "require" economic benefits'. In their final report the committee commented that there was a serious risk of regeneration benefits being lost due to lack of clarity in the legislation (SOL, 2004a), and that the principle of casino development 'adding value' to communities had not been addressed in detail (EX1).

Other recommendations by the committee included limiting the size of slot-machine jackpots and the number of slots allowed in each establishment. Development of regional casinos with unlimited slot-machine jackpots, as recommended by the DCMS (DCMS, 2002), caused the greatest concern (SOL, 2004a). Though the committee recognised that slot machines generate most casino profits, thereby increasing the potential for planning gain, unlimited jackpots could increase problem gambling. Responses to the jackpots proposed for large and small casinos were cautious for the same reason (SOL, 2004a).

In respect of planning, it was noted that the Office of the Deputy Prime Minister (ODPM) and the DCMS had different views on the locations of regional casinos and that these had not been integrated into wider casino strategy (SOL, 2004a). The joint parliamentary committee supported the DCMS in thinking that seaside resorts would be ideal locations for regional casinos. Similarly, a casino expert advising the joint committee was exasperated at the casino locations chosen by the government in 2008 (OPSI, 2008a), calling them flawed. The expert believed that seaside resorts were an ideal choice, since these had large entertainment complexes already committed to providing fun (EX1) and could therefore endow casinos with an 'entertainment identity' rather than a gambling one (in effect, a cloaking device (Lynch, 1998)). His opinion was supported by a DCMS tourist policymaker, who stated that, by primarily offering entertainment rather than gambling, they would attract a wider spectrum of consumers (DCMS2).

Much discussion by the committee also focused on the impact regional casinos might have economically and on the wider community. These questions dominated much of the evidence examined by the committee and instigated a specific report to address them (SOL, 2004b).

In December 2004, a policy paper was drawn up to accompany the draft bill during the committee stage (DCMS, 2004). *Casinos: Statement of National Policy* was designed to provide further context for the legislation and 'set out [the government's] stall'. However, the

document failed to define the word 'casino', or to explain how the new legislation and its outcomes would deliver regeneration benefits. This remains the case with the *Gambling Act 2005* (OPSI, 2006). The statement also called for both regional planning bodies and local authorities to identify general locations for the three categories of casino (DCMS, 2004).

However, legislation for the development of eight regional, eight large and eight small casino premises-licensing authorities did not go as planned. 'Looking at the progress of the bill through parliament, there were issues about the regional casino in particular, and a number of changes were made to the government's original intentions through the delivery of that policy. What we're generally expecting is something more akin to the large casinos in operation at the moment'. (DCMS1). The government took on board the joint committee's concerns, and, when presented to parliament in January 2005, the bill only contained provision for one regional casino alongside the eight large and eight small casinos, with slot machine entitlements restricted. After debates in both houses the bill received Royal Assent in April 2005 (OPSI, 2006).

Running alongside the legislative process was that of choosing local authorities to become premises-licensing jurisdictions. This task that was given to the CAP, and in October 2005, led by Professor Bob Crow, The CAP recommended to the DCMS some suitable locations for pilot casinos (DCMS, 2004). The panel was asked to take a cautious approach and to base their recommendations on 'the best possible test of social impact' (CAP, 2007b, p14). Two more criteria set out by the DCMS involved consideration of which areas would benefit most in terms of regeneration, and which local authorities would be willing to license a new casino (CAP, 2006, 2007b).

According to the panel, testing social impact meant developing 'a sufficient number of casinos in each category to allow the impacts to be assessed in a range of areas and types of location that might be suitable (including urban centres and seaside resorts)' and in need of regeneration (CAP, 2007b, p14). The panel was instructed to be mindful of the three broad objectives of the bill: protection of the young and vulnerable, prevention of gambling as a source of criminal activity, and fairness (OPSI, 2006).

However, the House of Lords criticised the panel's interpretation of social impact, on the grounds that it had given more prominence to economic factors (HOL, 2007), and that

locations had been selected where regeneration benefits could be maximised and social impact easily identified and traced. This indicated that they saw the bill as unbalanced in terms of the regenerating economy, society and place, as it focused mainly on the economic but with a convenient social control measure. It was claimed that the CAP had emphasised social impact rather than those issues likely to cause harm or locations where casino regeneration would be most effective (HOL, 2007). The Archbishop of Canterbury called the selection process social experimentation (Archbishop of Canterbury, 2007), while the House of Lords objected to the scale of regional casinos and their potential social impact (HOL, 2007). Omitted from these debates were the cultural impacts of casinos on society or their effects on tourist destinations and their markets. The CAP, the parliamentary joint committee and the House of Lords wrangled over the social-versus-economic implications of casino development, but completely ignored the question of how casinos might affect the cultural templates of resorts (EX1).

Also included in the CAP's work were public examinations of local authority applications to licence regional casinos (large and small casino applications are not subject to the same protocol). In hindsight, these examinations were a waste of time. In terms of economic benefits, the CAP (2006, 2007b) found that supply-side models used to calculate the economic benefits of casinos related mostly to (now redundant) regional casinos, but not to large or small ones (CAP, 2007b).

Although the CAP recommended a regional casino for Manchester in its final report of January 2007, this never materialised (CAP, 2007b). When the time came for government to implement their recommendations for appointing premises-licensing authorities, the House of Lords took issue with regional casinos. The government responded by moderating the *Gambling (Geographical Distribution of Large and Small Casino Premises Licences) Order 2008* (OPSI, 2008a), only naming locations for eight large and eight small licensing jurisdictions. Large casinos were to be allowed in Great Yarmouth, Kingston upon Hull, Leeds, Middlesbrough, Milton Keynes, Newham, Solihull and Southampton, and small ones permitted in Bath and North East Somerset, East Lindsey District, Luton, Scarborough, Swansea, Torbay, Dumfries and Galloway District and Wolverhampton. The parameters allowed for in terms of size for large and small casinos are illustrated in Table 5.

Table 5: Parameters for large and small casinos

Category	Minimum Table Gaming Area	Maximum Slot Machines Category B -D	Maximum Jackpot: Slot Machines	Maximum Slot to Gaming Table Ratio	Minimum Total Customer Area	Minimum Non-Gaming Area
Small	500m²	80	£4000	2:1 (40 tables)	750m²	250m²
Large	1000m²	150	£4000	5:1 (30 tables)	1500m²	500m²

Source: OPSI, 2008b.

As per the recommendations of the Budd report, other forms of gambling, such as betting on live racing and other events, can be offered in all casino premises, and in the case of large casinos Bingo may also be offered, but automated gaming tables, such as unmanned roulette, do not count (OPSI, 2009). Looking at the scale parameters of large and small casinos, it is evident that legislation has allowed for a minimum 50 per cent extra space for other activities, including slot machines. Furthermore, it is clear from *Safe Bet For Success* (DCMS, 2002) and *Casinos: Statement of National Policy* (DCMS, 2004) that regional and large casinos will offer entertainment and other leisure facilities in addition to gambling. Guidance on small casinos was never forthcoming. In order to clarify the various types of casinos that may develop in future, secondary research was undertaken by the author to create a typology for casinos to inform discussion of case-study locations. This can be found in Appendix 3 (p255).

Criticism of the casino development process has come from many quarters. Typically, official government opposition has complained of the way the various legislation processes have been handled, and of timing delays (CON1) in a process that began in 2001. An insider also noted the failure to use DCMS research resources – 'I don't think that as tourism people we were ever asked to evaluate, for instance, proposals of bids' from the CAP (DCMS2).

Specialist help may have uncovered the fact that supply-side models used by local authorities mostly related to the redundant regional casino model, and that little had been done to calculate the economic benefits of large or small casinos. The CAP (2007b) also noted that demand-side modelling, such as surveys of potential users, was ignored by local authorities. It is clear that the process used by the CAP and the DCMS has not been smooth. Explicit information needed by the CAP from local authority licensing-jurisdiction bidders had not been fully articulated (CAP, 2006), and local authority applications all differed in their approach and information submitted. A casino expert expressed his frustration at the process and criticised the panel chair Professor Bob Crow's approach (EX1). As the result of the various changes of heart by government, lack of guidance on the part of the CAP to local

authorities and the contentious nature of casino expansion, new casino development as a regenerative tool is still in progress.

5.4   NATIONAL – REGIONAL – LOCAL REGENERATION POLICY STRUCTURE

This section briefly outlines the framework for regeneration policy at the time the research was undertaken. This is important in order to frame how the culture of regeneration interacts with casino development. National policy frameworks and legislation set the context for decisions at regional and local levels, but regional government offices (set up in 1994) provide a first filter. Regional offices involved in casino expansion in the three case studies were East of England, South West and Yorkshire and Humber, and interviews were conducted with a representative from each office

At the time of research, the responsibility for regional spatial planning and policy under the Planning and Compulsory Purchase Act 2004 (OPSI, 2004) lay with the regional assemblies. The main planning document for each region was a Regional Spatial Strategy (RSS), which covered land-use planning and physical and socio-economic regeneration. This was an amalgam of plans compiled by local councillors who sat on regional assemblies. Bottom-up spatial plans created by the RSS were scrutinised by regional government offices for their 'fit' with national policy frameworks, before being adopted and subsequently funded by central government. Working alongside the RSS, and concerned with the economic implications of regeneration plans, were regional economic strategies (RES), which were the responsibility of the Regional Development Agencies (RDAs) set up in 1999. The objective of the RDAs was to enhance the economic competitiveness of the regions and deliver central government objectives for economic development and growth. Interviews were conducted with representatives of these agencies for the East of England, South West and Yorkshire and Humber.

Regional economic strategies (RES) were scrutinised by regional assemblies and regional government offices for complementarity and fit with regional spatial strategies (RSS). The latter were also scrutinised by regional government for policy fit and funding by central government departments. Besides the old arrangement of channelling Single Regeneration Budget (SRB) funds, European Regional Development Fund (ERDF) and European Social Fund (ESF) for training and employment initiatives through regional planning and economic

development bodies, sub- regional partnerships have also been created and funded by regional bodies, and provided investment for education, skills, and employment projects (ERDA, 2010).

It is useful to understand how regional–local spatial and economic policy interactions work, since they have a bearing on how casino regulation has been integrated into regional and local plans as a tool for regeneration. To further understand the relationship of casino regulation to regeneration, the next section sets out the casino-regulation process and the conceptions and perceptions of this process at national level. This will inform analysis of regional–local narratives of casino policy integration at the case study resorts.

5.5   CASINO REGULATION AND REGENERATION

The casino premises licence competition process was not fully completed in the case study locations during the fieldwork period of this thesis. Reasons for the delay will become apparent in the case-study chapters. Therefore, the author has not been able to examine and evaluate individual casino-developer competition applications put to local licensing authorities. However, it should be explained that the premises licence application code of practice laid down by the DCMS (2008) takes account of economic, social and regeneration impacts.

Original licensing applications put to the CAP could not be taken into account in the casino premises-licensing competition process, although some operators had already outlined their plans to enable local councils to justify their jurisdiction bids (DCMS, 2004). The two-stage premises-licensing competition allows for any number of casino developers to apply for a single casino premises licence. The first stage concerns itself with ensuring that applicants satisfy the regulatory requirements of the *Gambling Act 2005* and regeneration benefits (OPSI, 2006, Table 1, p19). The second stage of the process – in effect, the competition – begins when there is more than one applicant for a premises licence within a licensing jurisdiction.

Each casino development proposal has to be examined on its own merits. One of the advantages of the premises licensing process in Stage 1, is that application details regarding refinements, supplements and alterations can be discussed by local authorities with bidders, to maximise regeneration benefits. The licensing jurisdiction could at this stage enter into a

'licensing agreement' with an applicant and stipulate benefits as a condition for obtaining a licence. This agreement then goes to the final part of the second stage, whereby a winner is chosen and a premises licence granted. The licence details the benefits – in terms of employment, regeneration, design, location, and non-gambling facilities to be offered as part of the development – as a condition of that licence (DCMS, 2008). If only one bid is received, the process will end and the local authority may issue a premises licence, which is granted in perpetuity (OPSI, 2006). However, it should be noted that the licensing process and any subsequent agreement over regeneration benefits is separate and not part of the land-use planning process or an associated Section 106 Agreement (DCMS, 2008), meaning that schemes submitted as part of the competition process can be moderated at a later date.

With regard to regeneration benefits from casino development, the CAP's (CAP, 2007) final report stated that regional and large casinos would attract major inward investment and create the potential for economic regeneration. The casino expert, however, noted that due to the size and availability of 'the most popular form of gambling, namely, high-prize machine gambling', a near monopoly would exist, which would create an enormous asset for the developer (EX1), especially given that the casino licence was granted in perpetuity.

The major profits of any casino operation will derive from machine gambling (EX1). However, in the case of small casinos and their 2:1 ratio of machines to table games, creating a viable business model may be thwarted by government regulation (SOL, 2004b). Though the DCMS views small casinos as a more traditional type of operation with an accent on classic table gambling, bottom-line numbers may deliver little in the way of regeneration benefits (DCMS1, EX1). The large casino ratio of machine to table games at 5:1 is intended to reflect the move toward a more modern casino environment, but even this may not deliver what local authorities expect (DCMS1, EX1). A cautionary note was offered by a casino expert: 'I think local authorities shouldn't set their expectations too high' (EX1).

Since the regional casino idea was shelved, the potential inward investment estimate of £5 billion has been downgraded (SOL, 2004b), but a new figure has not been produced. Added to this, the potential for economic regeneration through large and small casinos will be markedly reduced because of industry concerns over machine entitlements (SOL, 2004b). While the DCMS and CAP assumed that large casinos (defined in Appendix 3, p255) as Type 3: Casino Multiplexes, offering facilities such as accommodation, conferencing and leisure

and entertainment amenities) would broaden the range of activities available at tourist destinations, small casinos were not mentioned (CAP, 2007b). In general, the panel advocated that a Type 3: Casino Multiplex should be 'ideally developed under the auspices of a commercially viable tourist development strategy and in recognition of the market viability of such a scale of development' (CAP, 2007, p5), but the potential contribution of a small casino, and the question of how regeneration might be delivered through casinos of all sizes, was ignored

It was apparent that experts at the DCMS were not consulted on local planning-authority bids (DCMS2). Had they been involved in evaluating the bids by 'calling in' casino plans, a viability study in terms of regeneration and other strategies could have better informed the CAP. The DCMS has been trying for many years to create cross-cutting awareness of tourism as a driver of regeneration, and could have offered the CAP detail on the contribution of casinos to regional and local spatial and economic strategies. This was pointed out in the interviews, and the fact that the CAP had paid no attention to the idiosyncrasies of seaside resorts (DCMS2).

A tourism policymaker at the DCMS took the view that casinos have been overplayed in the modernisation of gambling strategy, and that there was 'a sense of this being some miraculous magic wand that was going to transform things' (DCMS2). While he agreed that casinos could broaden what was on offer to tourists, he saw this as part of a process of tourist destination transformation and should have been linked to tackling social issues related to resort decline – poverty, education levels, joblessness and health issues. 'With tourism, one of the things you always thinking about is place-making and the first principle is that it's got to be liveable to be visitable' (DCMS2). This statement signals that a critical mass is required for revitalising a seaside destination and that the cultural impact of casinos need to be considered as a contributor to that process. Neither the CAP, nor the DCMS, nor the parliamentary joint committee addressed this issue in detail in their reports, responses or planning guidance for casino expansion plans. Rather, regeneration was dealt with as an economic problem and fundamental issues of social decline were ignored. It was also assumed that economic benefits would 'trickle down'.

Reports from the parliamentary joint committee and the CAP gave undue prominence to regional casinos at the expense of small ones, and the question of how regeneration benefits

could be achieved, beyond creating new products and jobs, was not fully addressed. The DCMS code of practice for licence applications only advised that issues of employment and regeneration be generally considered, a criterion that was open to individual interpretation. Furthermore, cultural aspects were not considered as a separate element in the regeneration equation (DCMS, 2008), which ignores that fact the consumption of culture and its impacts on economy, society and place are linked (Jameson, 1998).

'But the real value of going the [governments] beauty-contest route is that you harness the creativity of the private sector'. (EX1) '[Using] the best minds available to dedicate their thoughts on a profitable business model based on a long-term view of what provides tourist pull and delivers public enhancements, maybe a better bet' (EX1). This is how the government intends to secure regeneration through private-based but government-planned, top-down intervention. The strengths of the government policy for casino-led regeneration are threefold: firstly, the casino parameters set out by government as a framework for the private sector are commendable (EX1); secondly, there is opportunity to extend regeneration benefits beyond the licensing competition process via the planning system (Section 106 Agreements); finally, the scale parameters set for casinos by government have guaranteed a minimum level of inward investment, which will lead to the creation of construction and service jobs.

However, as the CAP reported, it is key that casinos are 'economically viable and capable of sustaining economic growth' (CAP, 2007b, p51). Without the larger slot machines demanded by operators, there may be a danger that inward investment, regeneration benefits and tourist transformation will not materialise (EX1). The development process therefore needs to be closely monitored to ensure the best possible outcomes.

5.6   CONCLUSION

This chapter has provided a national context for the case studies. Proposals for modernising and deregulating the casino industry through scrapping the demand test and casino membership have been explained, along with the legislation process and the work of the CAP. Also explored were issues connected with linking regeneration to licensed gambling under a single policy, and the failure of the current policy to explain how regeneration will be achieved. Finally, there remain significant concerns surrounding the social impact as well as importantly for this thesis, the cultural impact of casino expansion in tourist-dependent but deprived areas. These issues and concerns are further examined in the case-study discussions that follow.

CHAPTER 6

6.1   SCARBOROUGH: REGIONAL AND LOCAL PERSPECTIVES ON CASINO DEVELOPMENT

This chapter examines the research findings for Scarborough and reports on the strategy of using a small casino as a regeneration tool. Again, the case study is divided into three sections and begins by describing Scarborough's socio-economic problems and how these been addressed through regeneration policy and by the various agencies responsible. A chronology of selected local regeneration projects with a cultural focus illustrates the work that has been carried out.

The second section explores casino policy, its implementation at regional and sub-regional levels, and opinions on these, in the context of policy integration considerations summarised in Table 2 (p40). The way in which casino policy acts as a regeneration catalyst is examined and followed by tensions over regulation at sub-regional level. This is followed by regional visions of casino representations, identities and suitable location suggestions, and the cultural compatibility and impacts of casinos on the resort culture. These issues are informed throughout by using the cultural regeneration policy analysis framework.

The third section focuses on local policymaking using the similar themes, but includes social and moral tensions attached to casino regulation. All sections seek to arrive at a better understanding of the objectives and issues that will be considered in the final chapters.

6.2   BRITAIN'S FIRST SEASIDE RESORT

Purported to be Britain's first seaside resort, Scarborough has suffered decline like many other cold-water resorts (SBC1). Falling demand for tourism has resulted in over-capacity of facilities and increased unemployment (SBC, 2004). This combined with the loss of traditional fishing and agriculture industries, peripherality, poor transport links and lack of investment has created a spiral of decline. While the service sector accounts for over 50 per cent of the economy, this figure is low compared to the rest of the UK, which has benefited from growth in technology and financial services. It is therefore unsurprising that the council saw casino regeneration as the solution to creating employment and improving the town's tourist infrastructure and image. This perspective was partly shared by North Yorkshire county council (2004), which regarded Scarborough as less prosperous than other towns in

the region, though this view was qualified by other positive and negative observations. The council reported problems with job opportunities, below-average owner-occupied housing and above-average housing deprivation for the region. However, the town also had above-average employment (NYCC, 2004), and was recognised as a tourist centre and important service centre for Whitby and Filey (Smales *et al.*, 2004, p14). The above-average employment level was not recognised by the local authority (SBC, 2004).

According to an independent report that compares seaside towns (Beatty *et al.*, 2008), Scarborough is regarded as neither weak nor strong in terms of indices of deprivation (income, employment and education). In 2006, in a population of 54 900, total employment was estimated at 26 000 (Beatty *et al.*, 2008) and remained almost static over an eight-year period – just 2 per cent below the national average of 74 per cent. Beatty *et al.* (2008) highlighted that 34 per cent of all jobs were in the distribution, hotel and restaurant sectors, and a further 39 per cent were in public administration, thereby signalling an economy reliant on tourism and government. The report also stated that there was only a 1 per cent fluctuation in seasonal unemployment (Beatty *et al.*, 2008). These figures point to an economy that is dependent on tourism, but not necessarily deprived.

According to Beatty *et al.* (2008), this socio-economic landscape has improved owing to a rise in VAT registrations, while the local authority has reported an increase in manufacturing and a move away from the services sector (SBC, 2004). Prior to 2004, manufacturing contributed 15.1 per cent to the overall economy. Juxtaposed with this, the council noted in its casino-licensing jurisdiction bid that inner-town wards show signs of 'longstanding and significant deprivation' in line with the long-term decline of cold-water resorts (CAP, 2007c, p10). Despite their differences, it is clear that the regeneration of Scarborough and its tourist facilities were firmly on the regional, sub-regional and local regeneration policy agendas.

6.3 AN OVERVIEW OF REGENERATION AND PLANNING IN SCARBOROUGH

Aspirations for the regeneration of Scarborough have been framed according to central government policy. National, regional, sub-regional and local initiatives to stem decline have been outlined under individual policies (Table 6: Scarborough national-regional-local policy timeline, p78).

New Labour ideology re-focused on regional and local leadership in planning, as represented by the collaborative planning strategy of Yorkshire Forward's Urban Renaissance Programme of 2001. The bottom-up planning model (Roberts, 2000), where regional authorities facilitate the involvement of local public and private sectors and the community in place-specific regeneration, was followed in Scarborough's *20/20 Vision* (Hill and Hupe, 2002, SBC, 2006). The programme aimed to create better places to live and work through built environment improvements and increased employment prospects to contribute toward developing a 'contemporary and vibrant destination' (Scarborough's Future, 2010., Yorkshire Forward, 2010), and was supported by the York and North Yorkshire Partnership Unit (YNYPU) through a Sub-Regional Investment Programme (YNYPU, 2007, p6).

In 2002 the local Scarborough Renaissance Partnership was set up to take on the task of delivering regeneration. This was to be based on a collaborative model (Scarborough's Future, 2008), with advice from the community as envisaged by New Labour, (DCLG, 2006) on what was needed. In 2005, Scarborough council established a dedicated Project Development Team to work in partnership with the SRP and other private and voluntary-sector partners (SBC, 2010a).

This arrangement still exists today, with the SRP working in close partnership with the borough council – through the Regeneration and Planning Service department (SBC, 2010b) – and lay members of the local community who volunteer as members of the Town Team (Roberts, 2000, Scarborough's Future, 2008).[10] The Town Team is made up of various committees that meet regularly to discuss and create place-specific regeneration strategies, and has delivered various positive outcomes for the town that can take account of local place culture and different cultural identities (Jameson, 1998, Massey, 1994). For example, the physical aspects of regeneration are the responsibility of the Urban Space Group, made up of local designers and architects, and a council officer who reports to the council.

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[10] Following a restructuring of council services, regeneration has been delivered through the Regeneration and Planning Service since early 2008. The service is made up of 3 internal council units responsible for economic development, community partnerships and planning (SBC, 2010).

Table 6: Scarborough national-regional-local policy timeline.

Document	Year	Description
Local Plan 1999 to 2007	1999	Local planning guidance for the borough
DTLR: RPG 12	2001	Regional planning guidance for Yorkshire and the Humber
Scarborough Council: Renaissance Charter	2002	Collaborative vision for Scarborough
Scarborough Council: Kissing Sleeping Beauty.	2003	Regeneration planning for public spaces in Scarborough
Scarborough Council: 20/20 Vision.	2004	Local regeneration strategy and strategic investment plan includes Tourism
DCMS: Gambling Act 2005	2005	Includes provision for new casino jurisdictions
Scarborough Council: Corporate Plan	2005	Proposes casino development to improve tourism facilities in the town
Scarborough Council: Tourism Plan 2005 to 2010	2005	Casino development is not mentioned in this document
Yorkshire Forward: RES	2006	Strategic vision for regional economy. Casino for Scarborough not mentioned
Scarborough Council: Community Strategy 2006 to 2009	2006	Plans to drive community regeneration. Casino not mentioned
York & North Yorkshire P/Ship Unit: SRIP	2007	Plan includes Scarborough tourism objectives
Scarborough Council: Local Development Scheme	2007	Precursor to Local Development Framework
GOYH: RSS 2008 to 2026	2008	Regional Spatial Strategy
Scarborough Council: Draft Core Strategy	2009	Central document for Local Development Framework
Scarborough Council: Local Gambling Policy	2009	Contains new casino section and regeneration criteria for licence bidders
Yorkshire Forward: Urban Renaissance	2010	Regeneration strategy to improve urban environments in the region

Regeneration projects have sought to improve the image of the town, provide employment opportunities, stem deprivation and provide new strategies for economic development that are less dependent on tourism (SBC, 2004). Aside from the town's initial *Renaissance Charter*, in 2003 aims for improving the town's public spaces were detailed in a document, *Kissing Sleeping Beauty* (Scarborough's Future, 2010). In addition to the SRB, the ERDF (Objective 1, 2 and 5b) and ESF, funding, funds channelled through the York and North Yorkshire Partnership Unit (YNYPU) (YNYPU, 2010) have also been secured to realise local regeneration policies, including those dealing with education, skills and employment.

The *20/20 Vision* (SBC, 2004), that emanated from a bottom up collaborative planning exercise also proposed an investment strategy to promote growth of a cultural and creative industries base, with cultural attractions and workspaces located in the primary tourist area (Map 1, p81). The vision set out a number of specific targets: redeveloping the famous Scarborough Spa; developing the town's North Bay area through a new housing and leisure project; redeveloping the Rotunda Museum (Museums Trust) and art gallery situated in the primary tourist area; providing support for new events and promoting business tourism. The development of a casino was not included in this vision (SBC, 2006).

Some of these aspirations have been realised (Table 7: Scarborough regeneration initiatives, p80), such as the re-opening of the Rotunda Museum, the second oldest in the UK (TBS, 2010), while developing and staging new events in the town is on-going. In 2010 the Rewind concert – the largest celebration in the UK of live music from the 1980s – was held as a headline event to celebrate the reopening of Europe's largest open-air theatre space, the 6 500-seat Scarborough Open Air Theatre (Big Boo, 2010, SBC, 2010c). These regeneration successes led to Scarborough winning the European Commission's competition for the 'Most Enterprising Town in Europe' in 2009 (European Commission, 2009).

It was not surprising that Scarborough council seized the opportunity extended by central government to develop both a large and a small casino (CAP, 2007c). The main thrust of the application was based on the fact that 'there is a widespread consensus that the town should move from its image as a traditional seaside resort to becoming a high-quality town by the sea' (SBC, 2006a). According to a senior council official (SBC2), casino regeneration aims to increase employment within the tourist and leisure sectors and its supply chain, encourage low-season visits and help rebrand Scarborough to attract inward investment. The rationale

for changing the town's image was based on a key theme in the *Renaissance Charter* of 2002 – 'Key Theme 4 – Diversifying the economy, attracting inward investment and delivering quality service' (SBC, 2002) – which aimed to provide new culture-based jobs and facilities in a rejuvenated and dedicated area of the public realm. The council saw casino development as part of this agenda and a facilitator of long-term employment and on this basis made an application to the CAP (CAP, 2007c).

Table 7: Scarborough regeneration initiatives.

Project Year	Project Name	Description	Funding
2004	Sandside and Harbour Regeneration	Improve facilities and the environment for people both on and off the water in the central tourism seafront area. Completed 2008.	£2.8 Million from Scarborough Borough Council, Yorkshire Forward, ERDF and RNLI.
2006	Rotunda Museum	Refurbishment of museum building (2nd oldest purpose built museum in the UK) and adjacent public areas. Intended as a gateway to Scarborough's cultural quarter. Opened 2008.	£4.4 Million from Scarborough Borough Council, Heritage Lottery Fund, sponsorship and donations from the private sector.
2007	Woodend Creative Workspace	Creative industries hub includes local BBC studios and public gallery. Opened 2006.	£4.8 Million from Scarborough Borough Council, Yorkshire Forward and ERDF.
2007	Royal Albert Park	Reinstatement of the pathways leading down from Scarborough Castle, larger relocated skate park, adventure playground, picnic area enhancements, fitness trail, geological information displays and cafe improvements.	£572 000 from Scarborough Borough Council.
2007	Spa Refurbishment Phases 1 & 2	Refurbishment of physical and technical conference facilities. Re-opened 2008.	£3.75 Million from Scarborough Borough Council
2007	Sands Development	55 acre leisure and residential development overlooking the North Bay, Scarborough. Not completed.	£Unspecified. Private Sector
2007	Opera House Casino	Redevelopment of Scarborough's Opera House into a casino premises. Opened 2008.	£7 Million from Private Sector
2009	Open Air Theatre	Reinstatement and refurbishment of 6500 seat open air theatre in North Bay. Opened 2010.	£3.5 Million from Scarborough Borough Council, from Sands Project development funding
2010	My Place	Community centre to attract 13-19 year olds offering activities including street dance, music, arts, IT and media, a mini cinema and Friday night concerts.	Department of Education, Lottery, Third Sector (Coast and Moors)

Sources: Scarborough Borough Council, Scarborough Museum Trust, Coast and Moors Volunteers, Opera House Casino, Benchmark Limited.
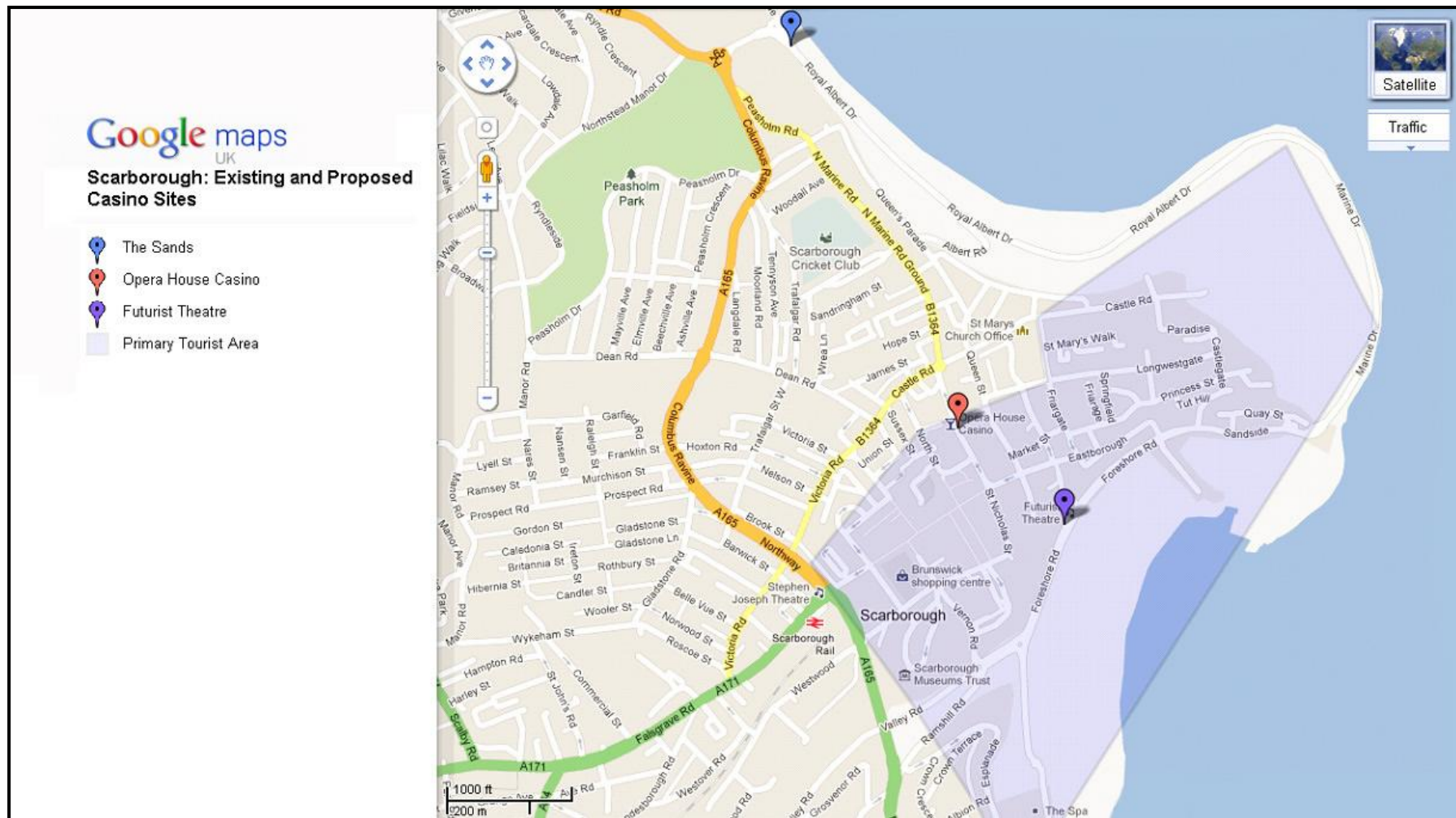
Map 1. Scarborough: existing and proposed casino sites.

However, the call for culture-led regeneration in Scarborough focused mainly on a relatively narrow definition of culture, which excluded leisure pursuits such as gambling (SBC, 2002). In general, the council's cultural regeneration plans have ignored its casino policy, indicating that, by seeing it as a 'visitor service', the council can distance itself from the negative impacts associated with the ideology of freedom of choice (McGuigan, 2005). Although the casino premises licensing bid was set in motion, it was only referred to in the council's corporate plan in a one-line sentence (SBC, 2005a, CAP, 2007c). The bid outlined two scenarios: the development of a large or small casino in the town's North Bay area in the £120 million residential and tourist Sands development, or a casino along the main tourist thoroughfare − the Foreshore − in an undisclosed building previously given planning permission for a casino. The council predicted a new casino would offer a significant new catalyst for regeneration at the North Bay site and create a new cultural image. The bid for the large casino was unsuccessful, though in January 2007, the CAP recommended that Scarborough be given the jurisdiction to grant a small casino-premises licence (CAP, 2008). The CAP's recommendation was implemented by the DCMS with the *Gambling (Geographical Distribution of Large and Small Casino Premises Licences) Order 2008* (OPSI, 2008a).

6.4   REGIONAL PERSPECTIVES ON CASINO DEVELOPMENT

This section examines the regional government perspectives on casino development in Scarborough, and draws on documentary sources and interviews with a policymaker (R1) from the Government Office for Yorkshire and Humber (GOYH), a tourist manager (R2), a regeneration manager (R3) from Yorkshire Forward (YF) the regional development agency and a manager from the sub-regional economic partnership YNYPU (SR1). Interviewees were asked for their perceptions on various aspects of casino-led regeneration, including how national policy had been integrated into planning documents, the regenerative effects of casinos, and their impact on the socio-economic and cultural aspects of the destination. They were also asked about the type of casino representation, identity and location that would most benefit Scarborough's resort culture.

6.5   CASINO REGULATION AND REGIONAL POLICY INTEGRATION

The introduction of new casino regulation was seen as a top-down exercise to create an environment for private investment to boost the local economy. In respect of regional spatial

planning, the process of integrating the new regulations into the regional spatial plan was forced. The policymaker (R1) who authored the economic and regeneration elements of the regional spatial strategy (RSS), and who was involved in the design and delivery of regeneration projects at local and sub-regional levels, described the imposed integration of casino regulation into the RSS as 'a bolt on. It didn't fit in. We had a longer genesis in terms of our strategic approach to the region and its future development in the RSS and we fitted the casino approach into that'. According to R1, the RSS used a settlement-study approach based on the best regeneration outcomes of sub-regional casino developments. This approach aided in the development of functional sub-regional spatial plans, with 'The Coast' (sub-region) and its capital Scarborough (GOYH, 2008) as the focus of 'significant casino development' (R1). Rational judgement was then used to pinpoint casino locations within these sub-regions.

As this was an un-tried and un-tested policy, these decisions were clearly not based on evidence. At a regional Examination in Public event (EIP) held by the CAP in 2006, R1 noted tensions among those giving evidence, and that attendees voiced concerns over the differences of evidence used to include regeneration strategies and projects in the RSS versus those for casino regulation. His personal concerns surrounded the evidence used as the rationale to develop regional casinos. 'Why should it receive a different strategic approach? Like any other form of development, it ought to be examined on its own merits in the light of new evidence. Once you start looking for exceptions it takes you down the slippery slope'. (R1). This view of the non-conformance in evidence-based planning concurs with the RES approach, where evidence is chosen to back up strategic prioritisation (YF, 2006a).

Interviewees from YF thought that the agency was just a conduit for implementation of casino regulation. The regeneration manager responsible for various regeneration policy documents for Scarborough believed that it was the local council's responsibility to 'facilitate a casino' (R3), thereby distancing the agency from the process (R3). This cautious approach tied in with his comment that in the collaborative 20/20 Vision planning exercise they (the towns people) 'didn't ask for a casino', specifically (R3). At the time there was already a casino in Scarborough. 'The project came from the top down' (R3), indicating that a licensing matter was seen as alien to the agency's role as a regional enabler for regeneration. In the context of integrating casino regulation at sub-regional level, there also hadn't been 'any sub-

regional or regional-effective input' (SR1), confirming this top-down approach. However, the tourist manager (R2) thought that, 'as an agency we haven't enthusiastically embraced it [casino development] as other agencies have'. This suggests that the agency was not committed to the casino strategy, but wanted to appear as supportive; and indicates a degree of socially regulating the integration process. This observation is borne out by the detail of the RES, which completely omitted the word casino (YF, 2006a).

Though the CAP recognised that casino development could provide economic regeneration, and that an aim of regional planning bodies is to improve prospects, there seems to have been a lack of confidence, policy commitment and support for the regeneration strategy at regional level. Because little evidence on casino development was presented, regional policymakers may have decided to give it low priority, or, in the case of the RES, not mention it all.

This also indicates that at regional level a top-down, socially contested form of regulation was not considered conducive to evidence-based planning, and that New Labour attempts to reinforce the role of regional government as an enabler of regeneration had been sidelined in this instance. The problem may be procedural since licensing is a local matter, but by not including a significant economic opportunity in its RES, YF and its sub-regional partner the YNYPU had regulated against the strategy due to social objections.

6.6   CASINO REGULATION AS A REGENERATION CATALYST

In terms of the regional perspective on casinos as a regenerative tool, the debate has centred on its role in reducing the drop in visitor numbers during winter months, and on providing employment opportunities all year round (SBC2). Nonetheless, the policymaker did not perceive a casino as being useful for resort restructuring (R1). The sub-regional manager perceived a similar outcome, with the casino only likely to improve employment on the scale of a successful hotel (SR1).

According to the regeneration manager, when local consultations first began, the town was not in favour (R3). However, to tie in with the RES and local authority aspirations, YF gave tacit support to the council in order to 'utilise the full potential of Yorkshire and Humber's physical and cultural assets' and 'achieve sustainable economic growth and jobs' (YF, 2006a, p32). It should be noted that the RES had prioritised tourism, with Scarborough seen as the

base for strong coastal tourism in both the RSS and RES. 'Activity will be focused on delivering a widely owned plan for tourism that brings together strategic priorities, evidence, actions and delivery' to boost performance through interventions, as part of the Renaissance programme (YF, 2006a, p56). But there was no mention of a casino as a strategic priority.

Though the regeneration manager (R3) said that a casino could be integrated into the town's tourist facilities, the evidence base to include it was lacking (R1). The regeneration manager added a cautionary note to its incorporation, saying that while it may have a positive knock-on effect by creating jobs and attracting people to the town, there is a worry that there will be too much gambling capacity in Scarborough (R3). This poses questions about a regeneration strategy that some consider contrary to regenerating a place suffering from social deprivation. His colleague, the tourist manager at YF (R2), was more detailed in her opinion on the potential of casino development as a regeneration catalyst, believing that the casino-licensing process should be used to attract quality development, which in turn would attract a higher-spending visitor, of which the majority would come from the region itself. Although she recognised the isolation of Scarborough in terms of access to the regional market, she felt that a quality development would attract more 'staying visitors' than day trippers and that this would significantly increase tourist receipts (R3). Hence, the potential of casino regeneration for job creation and stimulating the off-season market was recognised, but, as indicated by the policymaker (R1), there was little evidence provided. Furthermore, social regulation of gambling seems to have been imposed on the regional planning process. It is therefore not surprising that the casino strategy was not fully embraced in the RES, and given only tacit approval by interviewees at Yorkshire Forward (R2, R3).

6.7   SUB-REGIONAL POLICY TENSIONS

At the sub-regional level there were concerns over integrating casino policy with regeneration. The sub-regional interviewee described the casino as a 'leftfield' strategy, and did not think it could be 'easily integrated with a mainstream policy agenda'. It could also be said that the YF's reluctance to embrace the policy was mirrored at the sub-regional level, where casinos had not been included in the sub-regional investment agenda. 'I think the changes in the legislation and the government's approach effectively created an opportunity. I wouldn't say unforeseen, but something that wasn't predictable enough to integrate into a policy framework' (SR1). This manager appeared to feel detached from casino development

policy, seeing it as a licensing matter rather than a regeneration tool, and something to be dealt with at local level.

He was also against the idea of a casino for Scarborough. 'My personal view is that we shouldn't go for it or shouldn't have gone for it' (SR1). Additionally, he saw the notion of a local tourism multiplier as problematic, and was not confident that a casino would lead to an increase in visitor numbers and other tourist activities, saying that he thought it would be just 'a large free-standing successful business and you wouldn't get the multiplier effect' (SR1). This opinion did not concur with that of the regional tourist manager (R2), who believed a new casino could have a positive impact.

In terms of social impact, SR1 thought that the benefits of job provision provided by a casino might outweigh any problems caused by an increase in gambling. Again, this has implications for the social regeneration of Scarborough. However, he did express the need for resort restructuring, and thought that 'it fits in with coastal development policy in the sense of finding new venues and new attractions [and] recognising the policy aims of the spatial and economic strategies' (SR1), although this was not the case as YF did not support the strategy. He did recognise the need 'to replace what was effectively, and has been for a very long time, a declining market, and replacing that with a new market' (SR1), although he perceived a casino as non-complementary. SR1 generally agreed with the regional tourist manger (R2) that if Scarborough builds a new casino, it will be important to create complementarity between the casino and other tourist facilities, and at a standard to attract a new type of visitor (SR1). This would aid the cultural offering of the town, but again, questions of balancing job creation with the social problems that might arise would need to be addressed. This conundrum indicates that, as an economic unit without evidence of the likely social outcomes, the sub-regional agency felt cautious about supporting the strategy, preferring to see it as a local licensing matter.

6.8   REGIONAL VISIONS FOR A CASINO AND ITS LOCATION

How a casino is represented in terms of its built form and the identity it projects, as well as the cultural functions it performs, are issues that need to be fully explored for casino development to have a positive socio-economic and cultural impact. However, the CAP did not consider the representation and function of small casinos as rigorously as it did that of

regional and large casinos (CAP, 2007b). This was echoed by the views of regional interviewees. The casino as a concept was discussed during most interviews, but the label itself and what it represented differed. Managers (R2, R3) at YF saw the casino as a traditional 'Bond-esque' Type 1: Standalone Casino (Appendix 3, p255). This unimaginative perception may be based on the fact that the Opera House casino, located in the original regenerated Scarborough Opera House is just this. The sub-regional interviewee (SR1), on the other hand, saw the casino as a brash, Las Vegas-type, neon-lit multi-amusement attraction. The GOYH representative's vision was more demure, thinking that the operation be muted by a hotel front with the casino as an additional facility located behind (R1), which he felt would attract a different market to the accommodation sector in the off-season. In short, there was little agreement on how a casino should be represented.

There were also varying opinions in terms of location. The CAP reported that the casino would be best located in either the North Bay Sands area or the visitor area around the traditional seaside promenade on Foreshore Road in the South Bay (CAP, 2007b). However, the regeneration manager (R3) saw the town centre, away from the traditional seafront, as the most suitable. He was also concerned about over-capacity and character, thinking that only a standalone casino would integrate with the rest of the town (R3). The sub-regional policymaker thought along the same lines as the CAP: 'If anywhere, I would position it on the Foreshore, bang in the fish and chips area' (SR1). The policy planner and tourist manager, on the other hand, referred to the tourist development strategy in the RSS, which was not site-specific (R1, R2).

This variance in views from the Bond-esque to the neon-lit Las Vegas-style casino, on appropriate representations and locations reflected the degree of economic and social impact each interviewee thought would be generated by a new casino. How compatible these views are with the identities of traditional resorts and the sea/sun activities traditionally associated with Scarborough are explored in more detail.

6.9   CULTURAL COMPATIBILITY: THE RESORT AND THE CASINO

From the examples given in the previous section, it can be seen that there is a perception that casino spaces complement particular spatial practices including gambling that fits culturally. For example, Las Vegas was conceived by the private sector as a space for gambling and

entertainment to appeal to a particular cultural identity. This section considers the fit of a casino development into the culture of a resort. It was no surprise that the sub-regional representative did not see casino development as fitting into the present or aspired culture of Scarborough: 'Culturally, I'm not sure Scarborough would have been a good place for a casino relative to Blackpool' (SR1). This view sees revitalising tourism as a process of creating up-market attractions and exploiting 'the culture and heritage side'. Above all, his association of the word 'casino' with the Las Vegas, neon-lit identity did not fit in with his image of Scarborough and its established culture, and he questioned whether the town could manage two types of visitor: casino patrons and visitors looking for traditional seaside experiences.

Reiterating this view, he stated that 'policy was about culture, and developing cultural and creative' as 'a lynch pin around new markets' (SR1). He was not convinced that casino activity was as a cultural pursuit, saying that it 'was actually contradicting the broad policy thrust of [basing] the visitor economy around a broad understanding of what culture means', for example, 'restoration of the Rotunda, which is a Victorian Museum' (SR1). The town's 20/20 Vision and the YNYPU's sister organisation, the York and North Yorkshire Cultural Partnership (YNYCP), recommended that 'each mention of the term "culture" should be taken to encompass the full range of cultural activity' (YNYCP, 2009, p4). This suggests cultural agencies are casting a wide net, but as gambling and casinos were not mentioned along with art and music in their strategy (YNYCP, 2009), they clearly do not see gambling as a cultural activity. Alternatively, the policy is socially regulating against casinos being considered as cultural artefacts.

Despite this, the tourist representative (R2) believed that Scarborough's history as the first seaside resort could be built on through quality development, which included a casino. Her perception of a casino was of a stylish new offering that would add to the resort's character. 'What we want to do is present the first seaside resort of the country in a contemporary fashion, and if that is through a casino then so be it, but I want to make it clear I'm not saying that is the way to go'. This interviewee also cited social concerns, which mirror those at national level and which have been part of the casino debate before the 2005 Gambling Act became law. She added that 'there [was no] inherent reason why Scarborough isn't a place

you should do this as opposed to another place', and said that she expected Scarborough would eventually have a small casino (R2).

The policymaker at the GOYH was of a similar opinion to the sub-regional manager, in that the character of Scarborough as a traditional resort could be affected by the scale of casino development (R1). The scale so far proposed is for a large landmark development that would provide a significant new cultural reference point. The regulation permits Scarborough's casino to have 40 gaming tables, in contrast to the 8 gaming tables offered by the Opera House (Map 1, p81), and represents a potential increase of 500 per cent in the town's table-gaming capacity. He perceived such a large expansion in a family-oriented market as incompatible. 'If it was in Blackpool it would alter in a compatible way, but I think in Scarborough it would potentially alter in an incompatible way'. However, this view is not necessarily reflected by the townspeople as set out in their Renaissance charter. To reiterate: 'There is widespread consensus that the town should let go of the past and move on from its image as a traditional seaside resort to a high quality town by the sea' (SBC, 2002, p4), which leaves room for new or established spatial practices to be offered as tourism products. However, the majority opinion was that expanding a contested spatial practice is incompatible with a place representing family-oriented activities and values. Furthermore, the representation of a cultural reference to a contested activity was not compatible with recent culturally based regeneration interventions.

6.10   LIMITATIONS OF REGIONAL AND LOCAL CASINO POLICY RELATIONSHIPS

Based on the data collected at regional and sub-regional levels of policymaking, it is apparent that casino regulation and its implementation limited regular regeneration relationships. These relationships – based on a less centralised, bottom-up planning model – had been sidelined because of the licensing process, which bypassed established collaboration practice and regional-local knowledge networks that informs the regeneration decision making processes. As a planning instrument, top-down casino regulation has not been fully understood at regional and sub-regional levels, and has prompted a cautious approach, with little commitment and allocation of resources to explore its impacts. Essentially, casino regulation has been bolted on to regional spatial strategies and socially regulated by two

agencies due to social concerns, and therefore not included in economic and investment strategies.

This evidence explains why interviewees felt that casino regulation was incompatible with wider regeneration policy aims. The regeneration manager present at the consultation in 2002 when the Scarborough *Renaissance Charter* (SBC, 2004) was created noted that a casino was not requested (R3). The sub-regional representative (SR1) avoided getting involved as it was a local political matter, and the GOYH representative (R1) claimed that the EIP held by the CAP failed to include evidence on large and small casinos, concentrating instead on regional ones that were not going to be developed. This points to regional planners wanting to regulate casino development on a procedural basis too.

Though regional planners have been tied by the fact that casino regulation is a primarily a licensing (legal regulatory) matter, they have shown little support for local policy aims and there has been limited communication with local planners. At a board meeting held by YF in March 2006 (YF, 2006c), it was recognised that the agency had no direct role in the process and would not commit resources (impact studies on local jobs, location, and social impacts). However, they reserved their right as statutory planning consultees to moderate the representation, identity, and location of any casino developments in the region at a later date (YF, 2006c).

In essence, both regional agencies and the sub-regional agency were used as conduits in their role as facilitators for private-sector funding, although economic planning agencies chose not to get involved. The DCMS did require the RSS to give spatial guidance on future casino development, but without basing inclusion on sound evidence. [11] In general, the implementation of casino regulation has been approached cautiously, with little commitment to a strategy that might generate physical and economic benefits since dangers are perceived on social wellbeing. Added to this, there was a general perception that, as a new cultural reference point, casinos were viewed by many as incompatible with the history and character of the resort. To further understand these and other issues discussed at regional level, local perspectives of casino development will be explored in the next section.

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[11] The DCMS and CLG did not require casino development to be included in an RES (DCMS, 2004).

6.11 LOCAL PERSPECTIVES ON CASINO DEVELOPMENT

To understand perceptions of casino regulation at local level, interviews were held with individuals directly or indirectly involved in local policy creation and implementation, as well as with others such as business people and community workers with an interest in influencing regeneration outcomes for Scarborough. Interviewees ranged from a town solicitor and ex-chair of the Local Strategic Partnership (BIZ1) to representatives from local tourist businesses (BIZ2, BIZ3). Community representatives included a voluntary-services-sector representative (CON1), a church leader (COM2) and a volunteer member of the Urban Space Group (COM3). Policymakers included a senior council executive (LPM1), the town's regeneration manager (LPM2), a Liberal Democrat (LD1) and an Independent councillor (IND1) both from Scarborough's central wards, but representatives of the Conservative Party, which currently holds power in Scarborough, declined to be interviewed.

To provide context for local level interviews, it is necessary to first explain the background to the local casino regulation process. Under the *Gambling Act 2005*, licensing authorities are required to prepare an updated Local Gambling Licensing Policy, which covers all gambling activities within the borough, including the authority to hold a premises-licensing competition (OPSI, 2006). The competition process is required to set out a 2 stage judging format that includes submissions by developers of a casino scheme, site, regeneration and community benefits offered and the criteria for judging the submissions (DCMS, 2008).

Scarborough's policy was put out for public consultation from 1 December 2008 to 28 February 2009, and was adopted with minor changes to mitigate the risk of legal challenges (SBC, 2009a). Included in the policy were the benefits the council hoped to see offered by casino developers (SBC, 2009b), and listed as a cinema, theatre, four-star hotel, conference/exhibition and sports facilities. Other benefits cited were higher education facilities and partnerships and, importantly, on- and off-site education and assistance for problem gamblers (SBC, 2009b). The premises licensing competition was put out to tender on 22 April 2010 and closed on 30 July 2010 (Public Tenders, 2010). Should proposals have not offered sufficient regeneration benefits, or if there was only one bid (that did not offer sufficient benefits), a 'No Casino' resolution could have been adopted (Public Tenders, 2010). However, this was not the case – two premises-licence applications were received and a winner was chosen (*Scarborough Evening News*, 2011).

6.12   CASINO REGULATION AND LOCAL POLICY INTEGRATION

This section explores the way in which the local authority has integrated national casino regulation into local licensing and other policy areas, and how this integration has been perceived in respect of regeneration planning. Casino development was not written into the statutory Local Plan adopted in 1999, which called for tourist development to reinforce the unique identity of Scarborough and contribute to its image as a quality destination (SBC, 1999).[12] However, in 2005 casino development was mentioned as an aspiration to enliven the town's tourist facilities in Scarborough's corporate strategy, *'Delivering Success'* (SBC, 2005a). The document included an aspiration to submit a new casino-licence jurisdiction application to the CAP in 2006, with the aim of opening a new casino by 2011.

The interval between the adoption of the *Gambling Act 2005* and the town's corporate strategy document demonstrates the keenness of the local authority to take advantage of a privately funded regeneration strategy. However, integrating new national legislation into the local gambling policy took four years, and was hampered by various unresolved issues recommendations and confirmation by parliament of Scarborough's status as a casino-licensing jurisdiction (OPSI, 2008, OPSI, 2009). Further delay was caused by the risk of litigation by the casino industry on unclear and badly worded licensing policy (LPM1, SBC, 2009a).

Local policymakers had concerns about expanding a contested spatial practice, and felt that a critical mass of development was needed to re-create a quality town in line with the *20/20 Vision.* A senior council executive saw the casino as 'another piece in the jigsaw' that would be 'complementary to everything else we are trying to do in the town' in terms of regeneration (LPM1). The independent councillor was of a similar mind, seeing the casino as part of the regeneration process. 'It's all part and parcel of the same thing, really'. This indicated that interviewees directly involved in regeneration policymaking saw the town being handed an added opportunity to update its image, and embraced casino development as part of their general regeneration policy (IND1, LPM1). Similarly, a local businessman felt

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[12] The Local Plan was replaced in 2004. The Planning and Compulsory Purchase Act 2004 outlines new a new local planning regime. The new planning legislation is given detail in Planning Policy Statement 12 (PPS 12). Local authorities are now required to create a local development framework (LDF). The LDF is a composite of spatial planning documents that are underpinned by a core planning strategy. Specific development planning documents (DPD's) that relate to specific topics, for example housing, tourism, transport, leisure, and a statement of community involvement (how a community will be involved in the planning process of DPD's within a planning jurisdiction) are included in the LDF.

that a casino was 'a way forward that complements the local scene' (BIZ1), which would attract visitors and regenerate the night-time social experience for residents. But such comments are not reflected in many of the local planning policies.

Apart from the council's plans for casino development in its 2005 corporate strategy (SBC, 2005a), little has been done to integrate casino development into other policies. Casino development did appear as an item in its economic strategy of 2006 (SBC, 2006a), but was not mentioned in its draft Core Strategy, despite the inclusion of other large tourist attractions (2009c). Similarly, it was not considered in its tourism strategy (SBC, 2005b), though this was written the same year as the council's corporate strategy. And while the local regeneration partnership allocated a casino to The Sands project site in November 2009 (Scarborough's Future, 2009), there is no evidence that a casino was included in local community policies – including the *Community Strategy 2006–2009* and the draft *Sustainable Community Strategy 2010* (SBC, 2006b, SBC, 2010d) – both of which address tourism development at length.

At the local level – like the regional level –unanswered questions remain on how the expansion of a contested spatial practice would improve social well-being. However, the prospect of economic benefits coupled with a privately funded, new cultural landmark seems to have won support among policymakers and business representatives, though cautiousness has prevailed and led to policymakers regulating against the inclusion of the casinos into policy at local level. Social regulation was strongest with lack of support in the tourism strategy.

6.13   CASINO REGENERATION AND TOURISM

While current tourism policies do not specifically mention casinos, tourism is nonetheless seen as a major element in sustaining the local economy. Local authority interviewees saw the casino as a potential catalyst for building investor confidence, based on its regeneration track record so far (LPM1, LPM2), and should be combined with other public and private investment projects to enhance the town's investment image (SBC, 2009b). The senior council executive was optimistic, stating that, 'It's all about renaissance, regenerating the town and using the casino to increase visitor numbers, widen the leisure offer and bring more spending power' (LPM1). His colleague, the regeneration manager (LPM2), agreed, saying,

'It brings in private-sector cash to match public-sector funding we are getting from Yorkshire Forward and the RDF [ERDF], and makes an all-year resort of Scarborough, which is one of our key aims. Obviously, it's indoors so you can visit the casino in winter' (LPM2). This implies that the council wants to strengthen the town's relationship with tourism and extend its season, although this aim is not reflected in its tourism policy.

Many interviewees recognised the fall in demand for sun, sea and sand activities and were sympathetic to the 20/20 Vision (SBC, 2004) aspiration to increase visitor spend and re-image the town (BIZ1, BIZ2, BIZ3, COM2, IND1, LD1, LPM1, LPM2). However, one tourist business representative thought that the traditional tourist product – which mainly attracts income groups C, D and E – should be retained (BIZ2), though he also advocated developing new attractions to attract a higher-spending visitor from current catchment areas. [13] [14] Another tourism representative agreed with changing the visitor profile and putting greater emphasis on high-spending markets, to attract 'a whole new visitor to Scarborough', but not at the expense of alienating current business and conference visitors (BIZ3). As the owner of the town's only four-star hotel, he has a vested interest and sees a new casino as adding a new layer to the present business tourism offer (BIZ3). 'I think Scarborough's missing out on a tremendous amount of business tourism and if a casino helps someone to bring their group to the town, that's good' (BIZ3). The Liberal Democrat councillor agreed: 'We have to change the whole emphasis from the beach and seafront arcade to upper-class tourism' (LD1).

The proposal for a new small casino did, however, provoke concerns about gambling capacity. There is already the Opera House casino in Scarborough, licensed under the 1968 gambling regulations, which opened in the old Royal Opera House, St Thomas Street, directly off the main pedestrian shopping area, in 2005 (Map 1, p81). This houses 4 poker, 6 roulette and 3 blackjack tables, and has 40 slot machines. A smaller casino (owned by Grosvenor Casinos) was situated in the Grand Hotel – a ten-minute walk away – but due to over-capacity closed in August 2006, with the loss of 25 jobs (*Scarborough Evening News*, 2009a, 2009b, YF, 2006b). Concerns about over capacity related mainly to the risk of

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[13] Market Segmentation Theory: Generalised group by job, class and income. The socio-economic groups A, B, C1, C2, D and E classifies how much the head of the household earns and class of activity or employment (Kotler, 2002). A being the most professional and highest paid, E the least skilled and lowest paid.
[14] Catchment Area: Most seaside resorts in the UK grew in their early years by servicing the adjacent industrial hinterlands closest to them. Leeds, York and Sheffield are the traditional catchment areas for Scarborough (Walton, 1983).

displacing current adult and arcade attractions (LD1) – 'People have a lot of mixed feelings on that' (IND1).

A community representative (COM1) opined that it wouldn't make good business sense: 'I see the casino as quite marginal to the regeneration and tourism offer that we have,' noting that the present casino was not really part of the 'seaside scene' (COM1). Another argued: 'Don't forget we have two national parks, an extremely fine coastline and a huge amount of heritage, and we've got York as part of our tourism package as well. Why people come here…is not about the fact that we have a casino, and I don't think it would enhance our package'. He also thought that outside casino ownership would mean 'money…going to the stakeholders, to the people who invested in that company who live in other parts of the UK, or abroad (COM2). He agreed with COM1 on the displacement effect and saw another casino as 'a white elephant from the economic aspect' (COM2). Yet another community member saw a new casino as opportunistic – a last ditch attempt to stem resort decline through Boosterism,[15] saying, 'My theory is that the town is in such a stricken financial state that they will take the risk. It doesn't fit in at all. I think it's extremely undesirable to have one. I think you take a casino perhaps with a loaded gun at your head on the basis that you are done for as a town. I don't believe we should have one' (COM3).

The latest draft of the *Renaissance Investment Plan* (Scarborough's Future, 2009) called for further cultural, leisure and skills-based regeneration, as a way to offer more choice and boost consumption and as a complement to the *Renaissance Charter* (LPM1, Scarborough's Future, 2002). However, LPM1 offered a cautionary note, saying that 'the casino is not a panacea for renaissance' and would only be an addition to the critical mass needed to change the image and prospects of the town (LPM1). Indeed, the voluntary worker quoted above has yet to be convinced that a casino would bring regeneration: 'I'm not saying it couldn't contribute, but I've seen no evidence that a casino could and will contribute to the economy' (COM1).

One of the business representatives saw a new casino as just a means to rejuvenate tourism. 'It's not about regeneration for the locals [but] the people who visit' (BIZ3). This comment illustrates the town's dependency on tourism. Though regenerating the cultural offer of the town was perceived as a necessary by interviewees, community representatives in particular

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[15] Boosterism: In Tourism Planning it is the enthusiastic promotion of a city or destination, usually by those who live there especially within a political setting, and especially in regard to planning policies (Getz, 1987).

felt uncomfortable about increasing provision for gambling, a view that helps explain the cautious approach taken by policymakers.

6.14   SOCIAL AND MORAL TENSIONS IN CASINO DEVELOPMENT

Although the Gambling Act 2005 (OPSI, 2006) stipulates the need to protect the young and vulnerable, it is clear that some interviewees thought a new casino would increase social problems, though others were less concerned about potential social and moral effects.

Similarly, council policies that included casino development did not address the question of social impact, causing concern for one of the voluntary-sector representatives: 'I would like to see some specific proposals around that. I don't know what measures should and could be put in place to mitigate whatever effects the casino may have. I don't think that it's ever really been debated in any of the forums I've been in, which I think is strange' (COM1). Two community representative and a Liberal Democrat councillor also thought people would be put at risk (COM1, COM2, LD1). COM1 mentioned current social problems: 'The indigenous population is the most disadvantaged in the sub-region of North Yorkshire…I find it very difficult to reconcile. I'm not convinced of the value of a casino in terms of contributing to the regeneration of a seaside town like this' (COM1). But the independent councillor saw the issue differently: 'It could affect people's livelihoods, in that they could be gambling money for other things needed in their lives, but you can gamble just as much away in a betting shop' (IND1).

COM1 also thought that casino expansion could undermine past successes in social regeneration and create problems for future regeneration policy, 'on the one hand, saying we will use this as a tool to regenerate an area, and then that we will try to protect the local population from the results of that' (COM1). The fact that community strategies have not addressed this issue may explain why the council does not see it as a problem. It could also be because casino regulation places the onus, in the first instance, on casino operators to provide in-house support and counselling for problem gamblers (SBC, 2009b).

Another potential impact of casinos is anti-social behaviour. A local church leader was concerned that public safety, which is a problem on Friday and Saturday nights, could be exacerbated by a casino providing a focal point for late-night drinking. The current casino

operators have already participated in the Street Angels programme, to help combat anti-social behaviour and binge drinking associated with the Opera House casino (COM2).[16] The same interviewee also expressed concerns about the tension between what he described as the protestant ethic of enterprise and hard work and dependence on luck. He felt that people were unlikely to see casinos as entertainment, and would only patronise them if they believed they could win a lot of money (COM2). As such, gambling was a get-rich-quick solution for the desperate and local adolescents.

In general, interviewees wanted gambling to be regulated on social rather than moral grounds, but were sceptical about it as a regeneration solution. Furthermore, the duty of care placed on operators by regulators has failed to convince community members that it will address a potential increase in problem gambling. This indicates a loss of a holistic (economy, society and place) focus and sidelining of the bottom up collaborative regeneration planning model. This was apparent when interviewees were asked about the consultation process. Local authority objectives and economic incentives appear to have resulted in a lack of social regulatory concerns, with the council distancing itself from a duty of care to the public as the result of the ideological shift from state interference to individuals being responsible for their actions and choices (McGuigan, 2005).

6.15   CASINO CONSULTATIONS

Many people in the town were aware of a possible casino bid being made to government prior to a public consultation, which was apparent from the corporate strategy (SBC, 2005a). Inclusion of a casino in the corporate plan was to exploit it as a regeneration catalyst. But there were mixed feelings amongst interviewees as to the scope and content of the debate (SBC, 2005a). The senior council official said that the Gambling Licensing Policy consultation in 2008 (that included a casino section) was not about whether to have a casino, but about casino facilities, location and regeneration benefits and 'the social and other issues that the public [want] to see addressed'.

However, community and other workers felt this approach had not dealt adequately with social issues and wanted a specific debate. Prior to the 2008 consultation, a community

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[16] Street Angels are a uniformed association of voluntary workers, usually recruited from local churches, who come out on the streets of many Scottish and English towns on the weekends at night to assist late night revellers and victims of anti-social behaviour in sobering up, providing general first aid and other assistance whilst informally regulating the night time activities of revellers in high streets and town centres (SB9).

representative who was also a member of the local strategic partnership stated that she 'couldn't put [her] hand on a policy document with respect to a casino, or produce one for you. I'm disappointed there hasn't been a proper debate so that we can really get to the bottom of these issues and understand them better' (COM1).

By contrast, the senior policymaker felt that two sentences in the 14-page corporate strategy document sufficed as a casino consultation (LPM1). But others felt left out of this debate (COM1, COM3). Two community representatives (COM1, COM2) complained that the casino question had been buried in the corporate strategy without proper scrutiny (COM1), and that it needed to be more specific in terms of its impact on the vulnerable. Provision for dealing with the wider social issues alluded to earlier were also unaddressed in the local Gambling Licensing Policy. Another community representative who sits on the Town Team (COM2) shared this view.

While the senior council official stated that there had been 'wide political buy-in' (LPM1) on casino development, a Town Team member said that he and others had been discouraged from bringing up the subject at meetings (COM2), which is clear evidence that the collaborative planning model was being stifled. He saw two reasons for this discouragement: the chief executive was pushing the town toward casino development and public debate on casino development might increase the threat of litigation (COM2). Another community representative saw the whole issue of consultation as negative – 'I think it has been a bit polarising' (COM3) – and the Liberal Democrat councillor said he had filled in a form but heard nothing back from the council (LD1).

The independent councillor, on the other hand, claimed that the public had been adequately consulted on both the strategy and policy (IND1), and a tourism industry representative (BIZ2) maintained that public consultation and the tourism industry's input into the corporate plan had encouraged Scarborough's bid to be a licensing jurisdiction.

It is evident that consultation on the casino was subsumed – buried, almost – in other policy consultations, although a casino on the scale of that suggested for the Sands (touted by the council in its licensing bid) would create a significant new cultural reference to a contested activity. This begs questions about whether local authority objectives and economic

incentives sidelined social concerns. According to the independent councillor, 'our chief executive is very keen for this to go forward' (IND1) which indicates that casino regeneration has a purely economic focus.

6.16   LOCAL VISIONS FOR A CASINO AND ITS LOCATION

In this section interviewees comment on how a new casino should be presented, and where it should be located. This is discussed in terms of casino representations and the identities conceived for them. This is followed by views on the best location for a casino to produce optimum regeneration outcomes as well as its fit into the culture of the resort. The council saw the casino as capable of changing Scarborough's image among locals and visitors (CAP, 2007c), but this will depend on its representation, identity and location.

Interviewees were asked what type of casino representation would be best suited to Scarborough and why. Their perceptions varied little, although most envisaged a night-time facility and expressed preference for a Type 3: Casino Multiplex (BIZ2, BIZ3, IND1, LD1, COM1, COM3), as this would appeal to different audiences. There was also a feeling that the development should represent progress through regeneration and provide a new cultural reference point. The independent councillor stated: 'I suppose it's an entertainment vehicle. The present one has eating facilities so it's part of a night's entertainment' (IND1). A tourist industry representative also favoured the multiplex option as the best way to invigorate the night-time economy, and thought it should include all sorts of activities, including 'some form of new indoor attraction that was unique to Scarborough' (BIZ2). He was adamant that 'everyone would be against' a Type 1: Standalone Casino, as the town already has one. However, another tourist representative opined that they would be 'missing a trick' if it was not in use day and night (BIZ3). Council officials (LPM1, LPM2) were cautious about stating what they wanted, perhaps suggesting fear of litigation, though a senior policymaker thought that 'a standalone casino would not work as well as something that is part of a broader entertainment offer' (LPM1).

Some interviewees recognised that a multiplex could provide facilities the town lacked – 'The one thing that town needs is a multiplex cinema' – feeling that this approach would get the approval of local residents (BIZ2) and 'bring in people from outside to spend their money' (LD1). This may be construed as a concession to locals for not resisting casino a

casino by providing other facilities as part of a multiplex representation. Many also specified an indoor swimming pool with wave machine (COM3, IND1, LD1) but had no further ideas, suggesting that they were relying on the private sector (EXP1) to aid in creating the image of a 'high-quality town by the sea' (SBC, 2006a).

In terms of the image projected by the casino, most interviewees, including two businessmen, council officials, a policymaker and a community representative, envisaged an up-market Bond-esque type as the most suitable (BIZ2, BIZ3, COM3, LD1, LPM1, LPM2). This could be based on the fact that the Opera House casino exudes this identity. COM3 thought that the Type 2: Hotel Casino, which is usually a four-or five-star hotel, would provide the right identity. However, he was wary of past mistakes, saying, 'I think it's very important for Scarborough to have proper architectural considerations. Frankly, over the years, planners have either bowed to big business or not understood what they are approving. There are numerous examples of buildings and streets in Scarborough that we must not repeat' (COM3). Another community representative (COM2) also stressed the importance of those in power being 'sensitive to the community', while the independent politician thought that a Las Vegas-style, neon-lit casino would be more appropriate if a seafront location was chosen (IND1).

Other interviewees commented that there were two preferred areas in which to situate the casino (Map 1, p81): The Sands project in North Bay, and a seafront location in South Bay. Although suitable brown-field sites exist within the town, the senior council officer interviewed did not want to be drawn on potential sites due to the potentially litigious nature of the competition process (LPM1), although the council's licensing application to the CAP (SBC, 2006c) expressed preference for the same areas. The council had to wait for the bidding process to begin and for casino operators to offer the best regeneration benefits along with the specified site (LPM1), before evaluating proposals [17] [18] (LPM2).

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[17] PPS 4: Planning for Sustainable Economic Development (DCLG, 2009a) states that development should take place in town centres. Town centres are where a range of functions and facilities are provided for a rural catchment area. The town centre is defined as an area – 'which includes the primary shopping area and areas of predominately leisure, business and other main town centre uses within or adjacent to the main shopping area' – in the RSS or DPD's as the town centre. Existing out of town development that may include a town centre use does not constitute that development as being part of the town centre. Land uses in a town centre may include casinos. The harbour and foreshore are considered as part of the town centre.

[18] PPS 12: Local Spatial Planning (DCLG, 2008b) states that within a development planning document (DPD) the principle of 'Justification and Effectiveness' is required so that a DPD is considered 'sound'. Justified means that the DPD must be founded on robust and credible evidence, and the most appropriate strategy when considered against reasonable alternatives, and must be deliverable, flexible and able to be monitored.

According to local casino regulation, casinos should be in the urban area of Scarborough, although applications for elsewhere will be considered (SBC, 2009c). However, casino developers were advised to avoid suggesting sites close to schools or residential areas with a high concentration of children, or areas of high deprivation, places of worship (including Sunday schools) and facilities used by vulnerable people (SBC, 2009c). Regulation lists three areas as suitable: the town centre, North Bay and South Bay. According to the regeneration manager, 'You could argue that there are three centres because we have two bays, so planners have said that a case could be made for a casino [to be built] on the seafront, bearing in mind that…people go to the seafront for leisure-based activities' (LPM2).

It should be noted that in 2008 the owners of the Opera House Casino received planning permission for a £70 million up-market, four-star hotel, multiplex cinema, retail and car park complex on a town-centre site [19] (CABE, 2008b, *Scarborough Evening News*., 2008a). Although never taken forward due to the processes laid down in national casino regulation, a development on this scale would have provided a significant new opportunity for leisure activities, including contested ones, and dwarfed many local leisure sites. This location might have suited the community workers (COM1, COM2) who did not want to see a large potentially contested development near family leisure facilities, but none of the interviewees saw the town centre as the right location for another casino. In addition, a tourist representative thought this might pose a threat to the viability of the Opera House (BIZ3).

Two sites in particular were favoured by interviewees as the best locations for regeneration through tourist provision (Map 1, p81). The first is The Sands development in North Bay, which formed part of the council's bid (CAP, 2007c) for regenerating the now demolished Corner Cafe (*Scarborough Evening News*, 2008b) in the first area to suffer decline in the 1960s. In 2006 it was announced that this site would be converted into a £120 million beachside retail and tourist space, including beach huts, catering, accommodation, holiday homes, hotels, a conference centre, indoor and outdoor sports and adventure play areas, a health spa and fitness centre and a casino. Profits from the sales of apartment blocks were intended to help finance further development, but this has virtually come to a halt due to the 2009 recession and planning disagreements (*Scarborough Evening News*, 2008c).

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[19] The Opera House casino was the only casino open in Scarborough at the time of the fieldwork. A new E-Casino with three slot machines and three tables games, opened in the town in September 2010 (Casino City, 2011).

It is no surprise that this was the preferred site among tourism representatives (BIZ2, BIZ3), and that a community representative also saw it as an alternative to the main promenade on Foreshore Road (COM2, Map1, p82). Another community representative commented that 'the Sands development is currently stuck in a quite serious way' and would benefit from a casino to restart the regeneration of North Bay (COM3). The regeneration manager shared this opinion: 'At the moment the regeneration package at The Sands development [is] where the casino is earmarked to go. My view is that the best way to deal with it is to have it as part of one big entertainment area' (LPM2).

In the council's bid to the CAP, an alternative site exists on Foreshore Road, although un-named in the bid the site is occupied by the Futurist Theatre, on the promenade alongside the traditional penny arcades, ice cream parlours and fish and chip shops (CAP, 2007c). The site is in need of extensive regeneration, but a community representative remarked that 'we haven't been encouraged to think about the Futurist', although it was included in the CAP bid. The scale of the site would suit a multiplex and provide a cultural landmark appropriate for a 'high-quality town by the sea' (SBC, 2006a). There was strong support from the two councillors and two community representatives for this site (COM2, COM3, IND1, LD1) as an area associated with 'the traditional kind of seaside slot machinery, ice cream parlour and harbour' (COM3). IND1, who represents the ward in which the site is located, thought that a casino 'would probably need to be on the Foreshore within the perimeter of the existing amusement facilities [and] would complement what is already there' (IND1). A council official agreed with the idea of an entertainments complex offering traditional seafront activities (IND1, LPM2), but none of the interviewees thought that the famous Scarborough Spa would be a suitable location.

In summary, the Sands development appears to be problematic, and both council officials and tourist representatives see a casino development as the answer to getting the North Bay regeneration back on track. Although the Futurist site was preferred by some, this offered less space for a multiplex than North Bay, where the potential existed to create a 'Bond-esque', multifaceted development. The South Bay promenade, on the other hand, with its neon lights and seaside amusements, would be less conducive to a development consistent with a 'high-quality town by the sea'.

6.17 CULTURAL COMPATIBILITY: THE RESORT AND THE CASINO

Different views were expressed on how a casino might affect the traditional character of Scarborough. The senior council official was adamant that a new casino would not be detrimental to the culture of the resort: 'We have plenty of casino-type operations within the town so it won't fundamentally alter what's on offer – it will just broaden it' (LPM1).

A tourism representative agreed on compatibility and went further saying, 'A casino is no more important than a four-star hotel' to broaden the tourism offer (BIZ3), but the official and a business representative thought this could only be done through a multiplex representation (LPM1, BIZ2).

Other interviewees saw gambling as dangerous to the traditions of Scarborough. Although family amusement arcades have existed for decades, a community worker said she did not think a casino had 'a clear fit with that family resort feel' (COM1) and that it would introduce a very different type of gambling culture. Another community member felt that it wasn't 'consistent with the sort of image that Scarborough is seeking to have reassigned to itself' (COM3), and that it was 'about trying to replicate some of the tackier aspects of Blackpool' (COM3). He saw the renaissance of Scarborough as more to do with creating an up-market town by the sea.

Similarly, the Liberal Democrat policymaker thought the casino option was unsuitable for the town – 'Culturally, I'm not sure Scarborough would have been a good place for a casino relative to Blackpool' (LD1) – and that revitalising tourism was about creating up-market attractions and exploiting 'the cultural and heritage side'. Clearly, both he and the community representative (COM3) did not consider casino gambling a cultural pursuit.

6.18 CONCLUSION

It is clear that Scarborough is undergoing change. The renaissance programme – supported by the EU, national, regional and local government, and private investment – is considered well underway, and a number of regeneration projects have already been completed. Interviews with regional and local actors revealed widespread support for rejuvenating the town through the bottom-up collaborative planning, and most were positive about what has been achieved so far.

The town is still deeply dependent on seaside tourism, which continues to be seen as an important part of its history and economy, as well as capable of generating new economic opportunities. However, policymakers and businessmen see casino development as an additional strategy to achieve this objective through providing greater consumer choice. While casinos are regulated through legislation, they are also governed by moral and social codes. Legal regulation of casinos has been a top-down process, with the regional planning tier acting as a conduit to the local tier. Although a regional regulatory tier exists within the planning system, casino-licensing is not required to pass through this system until it becomes a local planning matter, and will then take place on completion of the licensing competition process. As directed by the DCMS, casino development has been 'bolted on' to regional spatial strategies, but regulation is also conjoined to regeneration planning and regional planners have had no previous experience of dealing with this type of mixed legislative instrument. There were also concerns that casino regulation had not been based on a robust evidence base, as is standard practice in regeneration policy.

A cautious attitude to casino development has therefore prevailed at regional level. Though casino development has to be included in the RSS, it does not in the RES, and is therefore seen as difficult to integrate into sub-regional investment policy. Consequently, regional planners have had little influence over casino development and have approached the issue largely on a social regulatory basis.

The local regulation picture is somewhat different. Local gambling licensing policy has regulated for casino capacity and general location. In line with aims to increase private investment in regeneration projects, applicants for a casino premises licence were directed to include regeneration and community benefits in their bids, and not to site casinos in or near places frequented by the young or vulnerable. However, some interviewees felt that the mixed legislative instrument was ideologically unsound and wanted further social regulation.

Most regional interviewees and all of the local community representatives expressed concern about increasing gambling in a town already suffering social deprivation. One regional interviewee was especially cautious about the lack of evidence on social impact, and many community representatives criticised the council for not considering the impact on vulnerable

groups. However, in general, moral and social questions were seen as less important than the potential for economic benefit and enhanced image.

Social regulation also played a part in constructing casino identity, since casino regeneration is required to provide protection for the young, deprived and vulnerable. Regional policymakers saw this as a conflicting strategy, rather than a holistic one that addressed economic, social and spatial issues in equal measure.

In local policy and casino-bid documents, casino development was promoted in terms of regeneration and community benefits, but most local interviewees saw it in terms of a new physical landmark representing a contested cultural activity, but which could also regenerate the town and increase its tourism potential. Policymakers and business representatives both thought that a multiplex would provide entertainment and be less controversial, while at the same time offering a lifeline to the night-time economy. Community representatives, on the other hand, saw a multiplex as a potential focal point for anti-social behaviour.

In national planning and regulation guidelines, regional and large casinos are conceived as a Type 3: Casino Multiplex, but small casinos are not defined. This creates a problem for regional planners, who have failed to articulate the representation of small casinos. Locally, it was felt that a large development would offer opportunities for economic development and regeneration, but that the council had stifled debate to avoid conflict over conjoining the issue of regeneration with a contested activity.

Many of the regional and some of the local interviewees (business and community representatives) seemed unsure of what a 'small casino' meant, and some were not even clear about scale (potential casino size of up to 40 gaming tables and an increase in table capacity of 500 per cent). Local policymakers and business representatives saw a casino as offering an activity that was both socially commonplace and morally acceptable, but community representatives focused on social impacts. Many interviewees, however, perceived a new casino in the form of a multiplex as compatible with the local character and history of the resort. It was also thought that a new casino should have an iconic identity that would signify modernisation and project an aspirational image.

Both community representatives and a policymaker advocated a cautious approach on account of the contested nature of gambling, perhaps even veiling a casino behind a hotel operation. Some also worried about the potential for business displacement from a multiplex, particularly for the existing Opera House casino and other adult arcade spaces along the Foreshore, since this might promote a negative image for the town.

From these examples, it can be seen that casinos were perceived as fitting into particular locations. Although a quality development, such as a 'Bond-esque' casino, could build on Scarborough's history as the first seaside resort, many community representatives felt it important that this did detract from the town's traditional family image. And though some thought that a multiplex would add to the resort culture, others considered casino expansion incompatible with the image that the town wanted to project.

To summarise, Table 8: Scarborough casino policy and development perceptions (p107), illustrates how national policy has been understood and interpreted at regional and local levels, and how interviewees envisaged the representation, identity and location of casinos in Scarborough.

Table 8: Scarborough casino policy and development perceptions.

Resort	Theme	Regional Perspective	Local Perspective
Scarborough	National Casino Policy Perceptions	Conjoins regeneration (including social) to contested spatial practice. Top down directive to add into RSS. Lack of evidence base. Economic focus with social and cultural impacts ignored. Policymakers socially regulate by non-inclusion in RSS. Considered local licensing matter. Damage to family values of resort. Can provide re-imaging of resort and rejuvenate facilities.	Conjoins regeneration (including social) to contested spatial practice. Focus on economic benefits and employment through tourism receipts for a town dependent on tourism. Provides a modernising cultural landmark and revitalises night-time economy. Adds to re-imaging of a quality town by the sea. Against casino expansion due to social concerns of vulnerable groups.
	National Casino Policy Integration	Mention in RSS but representation, identity and site specific location not addressed. Not included in RES. Not included in sub-regional investment policy.	Local casino policy includes representation and location but not identity. Cautious approach as social impacts not fully understood. Linking regeneration to licensing is procedurally flawed. Casino included in corporate plan but not economic and community policy. Non-inclusion in tourism policy. Local development partnership plans for North Bay casino. Consultation restricted
	Casino Representations • Type 1: Standalone Casino • Type 2: Casino Hotel • Type 3: Casino Multiplex	Type 1 or Type 2 that cloaks the gambling activity. Type 3 as brash identity.	Type 3 as offering best economic benefits and facilities for residents.
	Casino Identity	Bondesque identity for Type 1. Las Vegas identity for Type 3 depending on representation and location.	Bondesque as most suitable to reflect character and history of resort.
	Casino Location	Town centre for Type 1 or Type 2 with Bondesque identity. Foreshore for Las Vegas identity.	Informal development coalition sees North Bay as most suitable for up-market identity. Less in favour of South Bay and town centre.
	Cultural Compatibility	Large representation unsuitable to family character of resort and social concerns. Bondesque identity will suit resort character and history.	Identity, depending on location, is compatible with character of history of resort, that includes games of chance i.e. Bondesque in up-market North Bay is compatible.

CHAPTER 7

7.1   GREAT YARMOUTH: A REGIONAL AND LOCAL PERSPECTIVE

This chapter looks at the research findings for Great Yarmouth. As before, the chapter examines the research findings on the casino-regeneration policy debate, and reports on the strategy of using a small casino as a regeneration tool. The case study is divided into three sections. To provide a contextual backdrop, the chapter begins by describing Great Yarmouth's socio-economic problems, and how these problems have been addressed through regeneration policy by the various agencies responsible. A chronology of selected local regeneration projects with a cultural focus is provided to illustrate some of the work that has been carried out.

The second section explores casino regulation and its implementation at regional and sub-regional levels, and opinions on these, in the context of policy integration considerations summarised in Table 2 (p40). The way in which casino policy acts as a regeneration catalyst is examined and followed by tensions over regulation at sub-regional level. This is followed by regional visions of casino representations, identities and suitable location suggestions, and the cultural compatibility and impacts of casinos on the resort culture. These issues are informed throughout by using the cultural regeneration policy analysis framework.

The third section focuses on local policymaking using the same themes, but includes social and moral tensions attached to casino regulation. All sections seek to arrive at a better understanding of the objectives and issues that will be considered in the final chapters.

7.2   A HISTORY OF MARITIME TRADITION

Great Yarmouth has always had a strong maritime tradition. The town grew rapidly in the nineteenth century, to its present population size of 96 300 (GYBC, 2011a), through its maritime and tourist industries, and has been an important transport base for North Sea oil since the 1970s. However, the decline of the fishing industry coupled with the falling demand for British cold-water resorts in the late twentieth century took its toll and has created a range of economic and social problems (HIS1, Lambert, 2010, Taylor, 2010). Common factors experienced in other seaside town, such as under-investment, physical dilapidation, over-

capacity of tourist facilities, seasonal and permanent unemployment, and an influx of benefit claimants and retirees, has blighted the town.

Great Yarmouth is a gateway to the Norfolk Broads and is reported to be the third most popular seaside destination in England, generating £450 million from tourism annually (Audit Commission, 2005, GOEE, 2000, GY1, GYBC, 2010a). At the same time, in 2005, the borough was reported to be the seventy-first most deprived local authority area in England, with parts of the central Nelson and Regent wards severely affected (Audit Commission, 2005, CAP, 2007b). Of the total population, over 20 000 people are aged over 65 (GYBC, 2011a), and out of a working population of 59 600, 4 300 are unemployed. Employment is below the national and regional average (GYBC, 2011a), and has the highest unemployment rate among 43 resort towns (CAP, 2007b, Shaping Norfolk's Future, 2009). Eighty-five per cent of jobs are in the service sector and nearly one in three people work in the tourist sector (Audit Commission, 2005, CAP, 2007b, GYBC, 2010a). This situation has been exacerbated by seasonal factors including benefit claimants (GY1).

A 2003 study commissioned by Suffolk and Norfolk county councils stated that the industry needed restructuring to meet the demands of a more dynamic tourist market (SQW, 2003). Alongside a decline in businesses, the five key sectors of port facilities, transport, food processing, renewable energy and tourism could not sustain the economic growth 'required to reverse the area's long term decline' (SQW, 2003, p2). This was confirmed by the Audit Commission, which reported that the Conservative-run council lacked the wherewithal to stem the negative tide (Audit Commission, 2005), that residents were dissatisfied with leisure facilities and that adequate research into leisure quality had not been carried out. The commission also noted a general lack of consultation on what local residents wanted, as well as a lack of planning and monitoring of day-to-day public services. However, the regeneration of the town has been firmly on the council agenda and interventions have been produced at national, regional and local levels. An example of this is the proposal for a large casino.

7.3 AN OVERVIEW OF REGENERATION AND PLANNING IN GREAT YARMOUTH

National, regional and local authorities have all made efforts to reverse the town's decline (Table 9: Great Yarmouth: national-regional-local policy timeline, p112), and for the purposes of planning a sub-region has been created that includes the two coastal towns of Great Yarmouth and nearby Lowestoft (EERA, 2004a, 2004b, 2004c, EERA, 2005, SQW, 2003). In September 2005, a statement from the Government Office for the East of England (GOEE) recommended that regeneration continue to be concentrated on the two towns to invigorate the coastal economy (EERA, 2004b), taking into account their separate identities (EERA, 2005, GOEE, 2005).

Standard practice to create area-specific partnerships between government and private investors through urban regeneration companies resulted in the establishment of 1st East Waterfront Regen Company in May 2005 (1st East, 2006). The company has targeted waterfront and brown-field sites in Great Yarmouth and Lowestoft for regeneration and, in line with earlier regional planning and Norfolk county council's economic strategy, has highlighted tourism as a key sector for Great Yarmouth (1st East, 2006a, SQW, 2003). [20] In 2006, 1st East held a consultation on potential regeneration ideas with the public and third-sector stakeholders. As well as agreeing on proposals for cutting congestion and creating better road access into and around the town, there was overwhelming support for establishing a new board to improve leisure provision. The consultation agreed that the town's future depended on creating a positive contemporary image to visitors (1st East, 2006b).

Regional planning guidance (RPG) note RPG6 is a starting-point for understanding regeneration policy (GOEE, 2000). [21] In 2000, Great Yarmouth's regeneration ambitions included strengthening the economy through providing support to local businesses, promoting entertainment and retail facilities, improving transport access and increasing land supply (GOEE, 2000). These objectives were harmonised in later planning documents.

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[20] 1st East is financed by the East of England Development Agency (EEDA), Great Yarmouth and Waveney Borough Councils, and Norfolk and Suffolk County Councils.
[21] The Planning and Compulsory Purchase Act 2004 outlines new a new regional and local planning regime. The new planning legislation is given detail in Planning Policy Statement 12 (PPS 12). Regional and Local authorities no longer use Regional Planning Guidance documents or Local Plans. They are to be replaced, once adopted, by Regional Spatial Strategies, Regional Economic Strategies at the regional level and the Local Development Framework (LDF) at the local level. The LDF is a composite of spatial planning documents that are underpinned by a core planning strategy. Specific development planning documents (DPD's) that relate to specific topics, for example housing, tourism, transport, leisure, and a statement of community involvement (how a community will be involved in the planning process of DPD's within a planning jurisdiction) are included in the LDF (OPSI, 2004).

Since 2000, local policy documents have built on RPG6. *A Long Term Vision and Sustainable Community Strategy* (GYBC, 2008a), the draft LDF and regional economic and spatial strategies (EEDA, 2008, GOEE, 2008) have all complemented the aims of RPG6, and identified a number of specific regeneration ambitions including a casino.

In addition, the RSS outlined plans for the town to become a sub-regional development and regeneration centre in order to catalyse an urban renaissance. This involved increasing employment through retail expansion, enlarging port facilities and improving road access. Restructuring and invigorating the local tourist industry to generate employment was a major objective in both the RSS and RES, with a large casino seen as a central element in both plans. A specific policy within the RSS (Section GYL1) called on the borough council to include casino development in the LDF (GOEE, 2008), but this has not been adopted and instead casino development has been included in the *Corporate Plan 2008–2011* (GYBC, 2008b).

Some of the aspirations for revitalising the town's tourist and leisure facilities have been realised through capitalising on its character and history (Table 10: Great Yarmouth regeneration initiatives, p114). For example, two new museums have been opened, the Nelson Museum in 2002, and the Time and Tide Museum in 2004 (GYBC, 2005). Other regeneration projects involving tourism have also been achieved, including SHARPE (2008) and InteGREAT (2006). The SHARPE project converted underused visitor accommodation, empty residential homes and multiple-occupation houses (HMO) to improve the appearance and utilise over-capacity in Camperdown, adjacent to the primary tourist area.[22] [23]

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[22] Over-capacity has been caused by most visitors stay in caravans and holiday camps on the periphery of the town and visit the central area for shopping, seafront attractions and the beach (LPM1)

[23] Due to Great Yarmouth's status as an Assisted Neighbourhood Renewal Fund area, it was able to bid for central government funding for local business growth. Emanating from the Strategy of Neighbourhood Renewal (1998) the Neighbour Renewal Fund and the Working Neighbourhood Fund have been the principal funding mechanisms deployed at a local spatial level to drive forward improvements to local services in deprived areas through collaboration with Local Strategic Partnerships. Great Yarmouth council as one of England's 88 most deprived authorities was funded through the scheme (DCLG, 2007c). Under the Local Enterprise Growth Initiative a successful bid for funds in Round 1 (2005) and Round 2 (2006) of the programme provided £8.6 Million for local projects (DCLG, 2008c, NCC, 2006).

Table 9: Great Yarmouth national-regional-local policy timeline.

DTLR: RPG 6	Great Yarmouth Council: Local Plan 2001 – 2006	DCMS: Gambling Act 2005	EERA: Draft RSS	Great Yarmouth Council: Cultural Strategy	Great Yarmouth Council: Tourism Strategy 2006 – 2016	EERA: RSS 2008 – 2031	EEDA: RES 2008 – 2013	Great Yarmouth Council: Community Strategy	Great Yarmouth Council : Corporate Plan 2008 – 2011	EERA: Sub-regional Investment Plan 2008 – 2031	Great Yarmouth Council: Local Gambling Policy	Great Yarmouth Council: Draft LDF
2000	2001	2005	2005	2005	2006	2008	2008	2008	2008	2009	2009	2009
Regional planning guidance for the East of England	Local planning framework	Includes provision for new casino jurisdictions	Regional tourism strategy	Policy advocates heritage sites as tourism attractions	Tourism policy supports casino development	Regional spatial strategy supports casino development	Regional economic strategy supports casino development	Strategic vision for community development and regeneration	Plans outline the councils strategic direction including the delivery of a large casino	Details regeneration investment in Great Yarmouth and Waveney	Contains new casino section and regeneration criteria for licence bidders	Unadopted planning framework

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The £16.3 million InteGREAT project focused on improving the appearance and economic prospects of the primary tourist area. Renovation of the existing historic, retail and visitor environments has created a cohesive link between the town centre and market place, the seafront and the historic port on the River Yare. St George's Chapel and parts of the adjacent King Street conservation area are also being transformed as part of a new cultural and retail development (Hopkins Architects, 2010), but the largest project has been the £40 million harbour development known as East Port. This is intended to provide berthing for large cargo ships and will benefit the oil, gas and renewable energy sectors developing off the Norfolk coast. It is also intended that a cross-channel link to the port of Ijmuiden in the Netherlands

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with roll-on roll-off ferry facilities will be constructed to serve trans-European cargo and tourist traffic (East Port, 2010, EEDA, 2010, GYBC, 2009a, GY1).

Table 10: Great Yarmouth regeneration initiatives.

Project Year	Project Name	Description	Funding
2002	Nelson Museum	Establishment of a new heritage museum.	Undisclosed GYBC. Heritage Lottery Fund
2004	Beacon Park and Innovation centre	Creation of business incubator units, 300 residential units. Emphasis on renewable energy sector.	£2.4 Million (EEDA), Undetermined monies from ODPM, GYBC.
2005	Enterprise GY	Business support for new start up's includes Catalyst office block.	£8.6 Million from Local Enterprise Growth Initiative (LEGI Rounds 1 and 2).
2006	InteGREAT	120 separate projects to revitalise the tourism, retail and historic heritage of Great Yarmouth.	£16.3 Million from EEDA, EU Objective 2, Heritage Lottery Fund, Norwich County Council.
2007	East Port	Creation of deep water outer harbour and refurbishment of river harbour.	£40 Million £34 Million private equity. £6 Million from EEDA.
2007	Wellington Pier	Minor refurbishment	£6000 GYBC.
2008	St Georges Park	Refurbishment of facilities under CLG safer, Greener Communities strategy.	£2 Million from CLG, GYBC.
2008	SHARP 1 and 2	Ongoing project in Camperdown area to bring underused B&B's and empty homes back to residential use and improve street-scape.	£1.9 Million from Regional Housing Board.
2009	Townscape Heritage Initiative	Strategy to improve the resident and tourism environment in Great Yarmouth. Included visitor interpretation, developments to Time and Tide and Nelson museums.	£2 Million from Heritage Lottery Fund.
2009	St Georges Chapel and Plain	Restoration of historic chapel and development of community and visitors cultural and music venue with public square. Part of the cultural quarter strategy.	£3 Million from CABE Sea Change 2 funds.
2009	King Street	Restoration of historic commercial street providing attractive linkage to main commercial centre of Great Yarmouth. Part of the cultural quarter strategy.	£3 Million from CABE Sea Change 2 funds.

Sources: Great Yarmouth Borough Council, CABE, EEDA, Enterprise GY, SHARP.org, East Port.

Table 10 illustrates some of these regeneration projects, many of which are located in the primary tourist area (Map 2, p117). Though plans exist for more extensive regeneration (1st East, 2007, EERA, 2008, EEDA, 2008), there are physical as well as investment constraints. Land availability for businesses associated with port activities is hindered by the geography of Great Yarmouth, which is isolated from regional and national centres. Plans to improve road access to the Norfolk hinterland and beyond to tourism catchment areas has been hindered by national transport policy and lack of funding (LPM1). Many interviewees from Great Yarmouth regarded access problems as an obstacle to regeneration: 'It's quite a difficult place to get to' (LPM1) and is 'perceived as a bit of a trek' (BIZ1, LPM1).

Frustration with the main access road (the A47) is compounded by congestion inside the town, especially in the tourist season, and a third crossing over the Yare is needed to re-direct container traffic away from the town centre (LPM3).

Other problems affecting regeneration include the resort's image. Investment to upgrade the historic and culturally important Victorian and Edwardian seafront facades and buildings in the primary tourist area has not been forthcoming. Only £6000 was spent on redecorating the historic Wellington Pier, a major tourist attraction, while others such as the Winter Gardens and Britannia Pier are in disrepair and project a negative image (GYBC, 2008a). Due to replacement of their master planning consultants, action has either not started or progress has slowed on many 1st East projects. But other plans, such as upgrading the car ferry terminal at East Port, would be a catalyst for further employment and revenue (1st East, 2007).

In terms of the town's cultural strategy (GYBC, 2005), developing arts and leisure provision, as well as the natural and historic environments, to create employment and stimulate tourism, has also been advocated. Although a casino was not explicitly mentioned in the 2005 strategy, there is full support for casino development at both regional and local levels (EEDA, 2008, GOEE, 2008, GYBC, 2006a, GYBC, 2008).

Casino development is supported in the RSS and RES, and in local corporate, community, and tourism strategies as complementary to the cultural aspirations of the town (EEDA, 2008, GOEE, 2008, GYBC, 2006a, 2007b, 2008a, 2008b). This aspiration was reinforced by the CAP's recommendation for Great Yarmouth to become a licensing jurisdiction. As well as stimulating the economy and tourism, it was thought a casino could increase visitor numbers and create a year-round resort. The panel also felt that Great Yarmouth would be useful for testing the social impact of a large casino (CAP, 2007b).

According to local licensing regulation, a high-quality, large casino should provide regeneration and community benefits for Great Yarmouth. Casino developers are required in their licence bids to offer strategies for creating employment opportunities and skills training, and for improving the visitor demographic and night-time economy. They are also asked to provide solutions for any job displacement that might result and to address how a casino would promote small and medium enterprises and ancillary development (GYBC, 2009b).

Items spelt out in the regulations are integrated with local regeneration strategies. However, they do not address questions of place quality, and there is little indication that the town's character and history in terms of a casino has been considered. Importantly, the regulations do not ask casino-licence bidders how they understand local culture and how their development would fit into it. This observation will provide the backdrop to further discussions on the 'cultural' dimension of casinos, after considering regional and local perceptions of casinos as a regeneration tools.
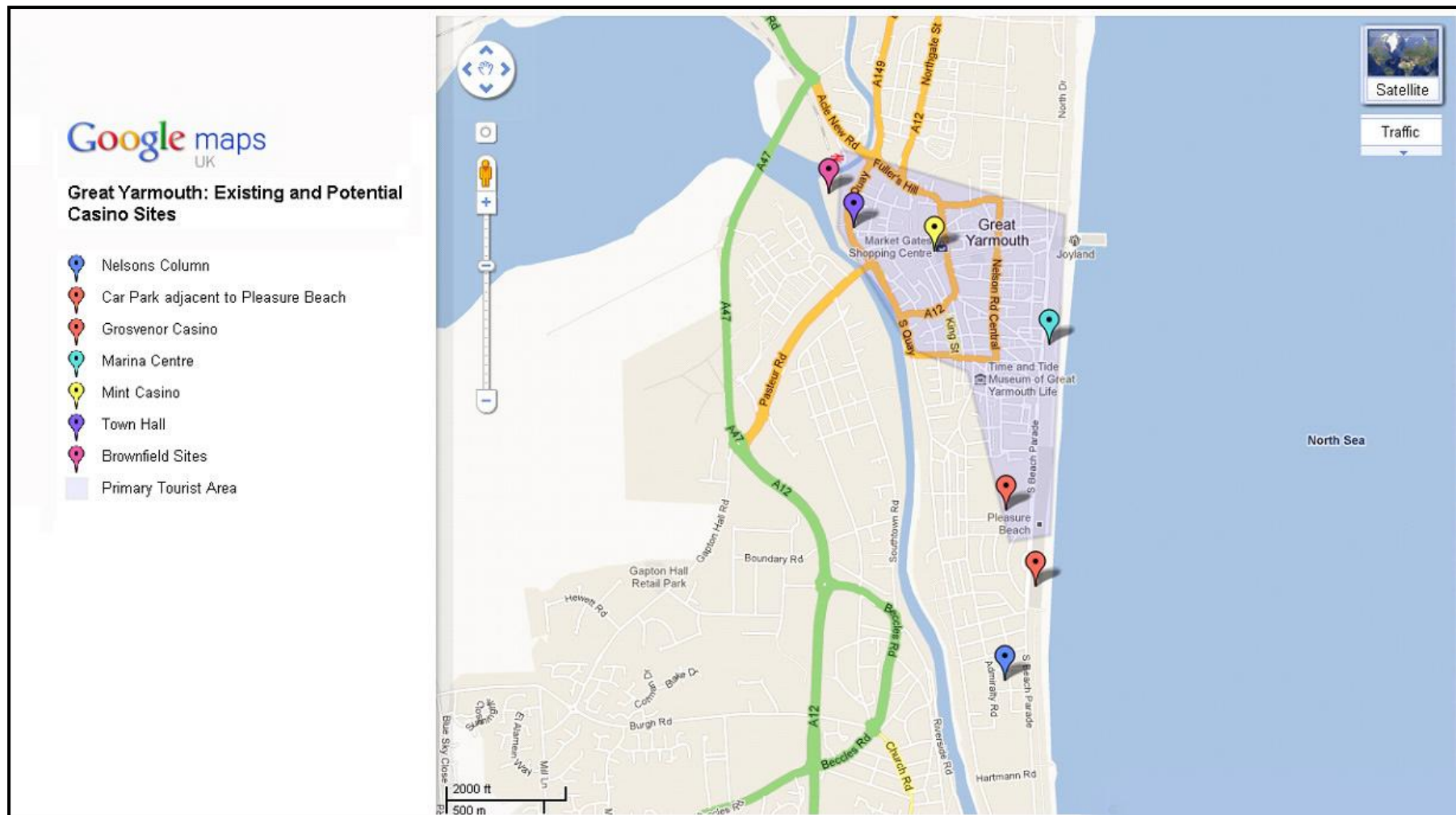
Map 2. Great Yarmouth - existing and proposed casino sites.

7.4   REGIONAL PERSPECTIVES ON CASINO DEVELOPMENT

As with the previous discussion of Scarborough, this section examines the regional government perspective by drawing on documentary sources and interviews. Interviews took place with a coastal policymaker (R1), a cultural planner (R2) and an economic development manager (R5) at the East of England Development Agency (EEDA), as well as with a tourism planner (R3) and regional spatial strategist (R4) from the Government Office for the East of England (GOEE). Interviewees were asked for their views on various aspects of casino-led regeneration, including how national policy was integrated into planning documents, and the regenerative effects of casinos and their impact on the socio-economic and cultural aspects of their location. They were also asked about the best location for and type of large casino they would recommend for Great Yarmouth.

7.5   CASINO REGULATION AND REGIONAL POLICY INTEGRATION

The timing of new national regulations in 2006 meant that local casino regulation could be integrated into the RSS and RES (EEDA, 2008, GOEE, 2005, 2008), which identified Great Yarmouth as the location for a new large casino. Policymakers and planners were asked how national legislation had been integrated into regional policy and whether this had produced any tensions.

It is clear that regional policy on casino development reflected the CAP's findings on the location. Regional aims to extend the visitor season, increase visitor numbers and stimulate employment and the local economy concurs with the aims of the national casino strategy (GOEE, 2008, GYBC, 2009c, CAP, 2007a). However, national casino regulation as a regeneration instrument was thought problematic by regional interviewees. The coastal policymaker (R1) was concerned about drawing people from deprived areas, since 'a key question about…the social consequences of casinos' had not been addressed by either the RSS or RES, nor, had the cultural impacts.

As with Scarborough, casino development was viewed as a top-down strategy (R3., R4) for 'promoting economic regeneration in particular locations' (R4), including Great Yarmouth (EEDA, 2008). The tourism planner noted that regional planners had been sidelined by the legislation (R3) in terms of markets and casino capacity, and had not been consulted on regulation or its socio-economic impact by the DCMS. They had not consulted on these

issues by the local authority either. Similar to Scarborough, there was a perception that casino regulation went 'straight from central to local government' with 'no input sought in any way', and that they were 'never quite clear of the link between regeneration and casinos. The only compelling argument was for extending the season' (R3). This suggests opposition to casinos as a regeneration strategy although it has been adopted in both the RSS and RES. However, the spatial strategist thought that to support economic development and growth in the town, 'if that's achievable through this particular type of development, then it would seem to fit quite well with the objectives' of the spatial strategy, which included casino regeneration as a economic development tool (R4).

However, the RSS does not take account of the potential of casino regulation to increase socio-economic inequality, or allocate a role for the voluntary sector to address the potential social problems and costs of gambling (EEDA, 2008, GOEE, 2008, GYBC, 2009b). The spatial strategist, who was 'not particularly au fait with the detail of government policy on the casino announcements' (R4), recognised that the national casino strategy had been contentious. These comments indicate that casino regulation was not fully explored and researched at regional planning level and that lack of involvement and consultation had caused social issues to be bypassed (R1). Regional planners did not understand the significance of planning for the impacts associated with a contested activity and therefore focused on the economic effects. At the same time, regional policy failed to take into account national guidance on large casino representation or its likely impact on place and local culture, and failed to research the potential market for increased casino capacity.

7.6   CASINO REGULATION AS A REGENERATION CATALYST

As with Scarborough, there was agreement at regional level that casino development would create new jobs and attract new a higher-spending visitor (R1, R2, R4, R5). However, socio-economic impact research at regional level has not been carried out, with the result that any impacts and benefits cited are anecdotal. One respondent felt positive about a casino providing construction jobs for a town with high levels of unemployment and boosting its role as an engine of sub-regional growth (R4). This fits in with policy aims to reduce income and opportunity inequality and to encourage economic growth (EEDA, 2008, GOEE, 2008). However, skills and educational attainment are low in comparison with the regional average and the interviewee seemed unaware of the specific skills needed by casinos. The RSS calls

for local development plans to include skills training generally, which may explain why Great Yarmouth College plans a gaming academy to equip people with casino skills, although how or when this will be achieved is not detailed in the RSS or RES (CAP, 2007a, EEDA, 2008, GOEE, 2008). There is, however, a pool of hotel and catering workers in the town who could fulfil some of the needs of a casino employer.

The borough's estimate of creating 350 jobs through casino development (non-construction), made to the CAP in 2006, was based on a planning application submitted before the local casino-licence competition began in 2010 (CAP, 2007a, GYBC, 2008c). In an outline planning application lodged in 2008, a local developer estimated that 700 full-time jobs would be created (GYBC, 2008c). Though casino jobs could contribute to the regional target of 5000 new jobs between 2001 and 2021, these estimates may or may not materialise (GYBC, 2009b, EEDA, 2008, *Yarmouth Mercury*, 2010) based on council and developer estimates that diverge widely. Hence a mixed picture emerges, with both parties painting a different picture of the economic advantages of casino development; how these estimates will impact on regional employment targets remains to be seen.

Regional interviewees indicated that they had little knowledge of the economic aspects of casino regulation, including employment opportunities. Other potential benefits of casino regeneration (CAP, 2006, Lee, 2006) – creating a local multiplier effect, inward investment, extending the season, increasing visitor numbers and spend, and how policy can monitor and measure these effects – was not detailed by interviewees. 'I suppose it hasn't been tested before' stated the regional spatial strategist (R4), who stressed that it was important 'how you assess and design policy for any of the aspirational spin-offs that this might actually achieve' (R4). For example, the economic development planner hoped it would answer the 'lack of quality accommodation', though this view appears not to be based on evidence of the benefits of casino development (R5). The spatial strategist thought a casino would act 'as a catalyst for other things' that could, together, contribute to a critical mass of 'attractiveness, customer friendliness and usability for a wider part of the town centre, so that you're promoting a more holistic approach to, say, the night time economy – the honey-pot idea of trying to attract people through a range of different reasons' (R4).

This interviewee added a cautionary note. Dropping a casino into a deprived area might be seen as 'an island, something that's just plonked in there [and] isolated in its own function and area', and thereby contribute to socio-economic inequality (GOEE, 2008, R4). The cultural planner (R2) also felt that the economic benefits of a casino might be outweighed by the social consequences in deprived areas. The spatial strategist agreed, stating, 'If you were doing a sustainability appraisal you could argue that it might have economic benefits, but the social benefits, sorry, social dis-benefits, in terms of encouraging gambling and other things, might actually outweigh those [economic benefits] or balance them out in a detrimental way' (R4). Although the RSS specifies that new developments should contribute to creating sustainable communities and include provision for social services (EEDA, 2008), it is hard to see how social regeneration can be planned for through casino development.

In terms of social-service provision, the RSS also did not make clear what would be needed in the region to address the impact of casino expansion, directing only that development should contribute to local community sustainability. Furthermore, no account is taken of problems that may be exported elsewhere in the region.

In terms of the immediate geographic impact of a casino, if it is sited in a deprived area, there may be two different demographics involved: casino customers and the others. Can these two groups contribute to regional planners' aspirations for social cohesion and inclusion? For example: 'I went past a small casino, it was lots of slot machines in the front and then they had a bit behind [where] they were offering free food, and it just seemed to me that it spirals the issue…you don't even need to leave the casino to get your food, and if you haven't got the money for food you can just spend it in the casino instead' (R1). Another impact not considered in regional policy is child neglect. Since 1994, 317 people have been banned from the Star City casino in Sydney for abandoning their children. Since the casino opened, this trend has increased each year. In 2008, '18 parents were found to have left their children in either the casino's car park, food court, foyer or hotel rooms while they gambled' (*Sydney Morning Herald*, 2009). In terms of protecting the young, a central objective of the Gambling Act 2005 (OPSI, 2006), this has not been addressed by national, regional or local policy. 'I think that is a vacuum,' stated the coastal policymaker (R1).

The cultural planner was also cautious about the potential for displacing other tourism businesses. He thought that it was going to be 'a little bit hard on people who've got established businesses of a similar kind, and of course once they start closing down then your new one is going be of no advantage' (R2). A new casino could harm adult-entertainment centres and family-oriented penny arcades on the seafront and in town. Rather than assessing outcomes on the basis of sustainability, as in the case of publicly funded projects, privately funded casino development may not employ the same rationale: 'It's not quite clear how it would come out in terms of a net overview of its economic versus social [and] environmental benefits' (R4).

Interviewees clearly perceived privately funded regeneration as an economic strategy rather than one aimed at creating a cultural asset consistent with a traditional family resort. The cultural planner felt that community cultural values would be ignored 'through the values which drive casinos' (R2). The socio-cultural strategies that 'engage people through ideas and…their imagination' is normal practice in cultural regeneration projects. Indeed, the idea of imposing a large-scale, private-sector casino was seen by two interviewees as in conflict with New Labour ideology, which emphasised the importance of using public/private partnerships to create positive socio-cultural change (R1, R2).

Regional planners have made it clear that this is a private-led strategy over which they have little control and one that has not been well researched in terms of benefits. According to the CAP, the first wave of casino development is a test 'of whether the introduction of the new types of casinos [will lead] to an increase in problem gambling' (CAP, 2007b, DCMS, 2004, p2). In effect, this is pursuing a neoliberal approach that does not take account of potential social dysfunction, and operators will have to deal with the results of what the Archbishop of Canterbury (2007) sees as a flawed experiment.

7.7   SUB-REGIONAL POLICY TENSIONS

Regional planning documents have been based on a configuration that creates a sub-region made up of two local authorities – Great Yarmouth and Waveney – and is divided by the Norfolk/Suffolk county boundary (GOEE, 2008). Regeneration planning at the sub-regional level involves four public bodies: Great Yarmouth Borough Council, Norfolk County Council, Suffolk County Council and Waveney District Council. Regeneration is centred on

the urban areas of Great Yarmouth and Lowestoft (Waveney district), which are both seaside resorts. However, any policy tensions concerning casino development at sub-regional level have been overshadowed in recent years by wrangling over proposed boundary changes to combine the two local authorities of Great Yarmouth (Norfolk) and Waveney (Suffolk) into a single unitary authority (Electoral Commission, 2008). A *Daily Telegraph* (2008) report stated: 'They are two of England's most historic counties and have been rivals for 1,500 years'. However, Waveney residents held different values to their neighbours in Norfolk and put paid to the changes (*Daily Telegraph*, 2008, OPSI, 2010). This cultural difference can be seen in the provision and location of sub-regional gambling. A study carried out in 2006 (DTZ Consulting, 2006) claimed that the sub-region had a higher-than-average propensity for gambling, and suggested that casino facilities would complement other gambling venues in Great Yarmouth for horse and greyhound racing.

However, a report on development sites and land use by Waveney District Council in 2010 (NSP Group, 2010, Waveney District Council, 2010) stated that casinos are too specialised to for Waveney, but does not explain why. And although the council considered a casino in 2006, it was found unsuitable (Waveney District Council, 2010) and a licensing-jurisdiction application was never made (Waveney District Council, 2006). The council (2007) nevertheless acknowledged that a casino should be developed in Great Yarmouth to aid regeneration of the sub-region. Although regional interviewees did not accept that sub-regional tensions on casino development existed, there is evidence of nimbyism. According to the spatial strategist, a review of regional strategy is planned for 2010, and the casino 'may be an issue that is addressed in, for example, the key sub-regional policies for Yarmouth/Lowestoft' in more detail (R4).

This indicates that Waveney District Council have socially regulated against casino regeneration. Although there may be some overspill in terms of economic benefits to Waveney from increased visitor numbers, the council prefers to see the social impacts and other costs dealt with by Great Yarmouth.

7.8   REGIONAL VISIONS FOR A CASINO AND ITS LOCATION

The history of developing a large casino in Great Yarmouth dates to 2007. The spatial strategist (R4) was aware of an outline planning application for a large seafront casino hotel

and entertainments complex (GYBC, 2008c), based on the Type 3: Casino Multiplex (CAP, 2007b). He agreed with the cultural planner (R2) and economic development manager (R5) that this would provide 'a cluster of different types of cultural activity' (R2) best suited to the resort. These opinions mirror those at national level and indicate that most regional planners thought a new cultural facility would promote cultural tourism and widen the resort's cultural appeal and market share (R2). The economic development manager also warned that a casino had to project a 'modern attraction of sufficient quality' to achieve these aspirations (R5), which implies that a Bond-esque type would be the most suitable.

It was felt that the shortage of wet-weather attractions in the town could also be addressed by a multiplex as 'another way of keeping the location going even in the foulest weather' (R5). However, the coastal policymaker (R1), who had concerns about casinos in deprived areas, opted for the Type 1: Standalone Casino or a Type 2: Casino Hotel, as she thought that 'vulnerable people' would not be welcome in either (R1) and therefore prevented from gambling (R1).

The cultural planner offered a cautionary approach on the identity of a casino, although he admitted he didn't 'know Yarmouth well' (R2) and was negative about casinos generally, stating, 'I think it could send…a negative message" (R2). He also thought the new casino would not symbolise regeneration since 'they're not going to be building something of particular architectural significance', unlike other cultural spaces. 'If you build an art gallery, you build a museum, you open up the park, people in general feel positive about having those sorts of things in their community' (R2), whereas a casino would be 'a blot on the landscape' and not contribute to the physical or cultural attractiveness of Great Yarmouth (R2).

In terms of location, the spatial planner thought a multiplex should be located near the traditional tourist facilities anywhere in the primary tourist area to create a 'catalyst-type effect' (R4), but most interviewees opted for a location on or adjacent to the Golden Mile, the seafront promenade where the Grosvenor Casino is sited (R1, R2, R4, R5). The economic development manager suggested reinforcing the town's maritime heritage by locating the multiplex near the Admiral Nelson monument at the end of the Golden Mile, on or around the 'nice little Georgian Square' (R5). The area is partly surrounded by industrial land but is near

the SHARP regeneration area, where a multiplex could provide a further catalyst for regeneration locally and in the port area beyond (R5).

In summary, it was evident that most interviewees (R2, R4, R5) thought a Type 3: Multiplex casino would be most likely to produce economic benefits through improving local facilities. However, one interviewee wanted a casino type that would dissuade the vulnerable from gambling (R1), since regeneration is also about addressing social needs. Only one interviewee indicated that a Bond-esque identity would offer the best benefits, provided it enhanced the town's appearance. The majority thought that a multiplex should be placed on the seafront promenade, while one person (R5) suggested that a casino could be used to reinforce the town's maritime history.

7.9   CULTURAL COMPATIBILITY: THE RESORT AND THE CASINO

Most regional planners were positive that a large casino would fit into the resort culture of penny arcades, slot machines and other games (R1, R4, R5), while the economic development manager thought it provided the 'potential for it [Great Yarmouth] to be modernised and to have another strand' (R5). Though there were social objections to locating casinos in deprived areas (R1) and to the values of the casino industry in general (R2), other gambling facilities, that include two casinos, horse and dog-racing tracks, and pub slots and seaside games, were already available in and around the town (DTZ Consulting, 2006, World Casino Directory, 2010). However, the cultural planner (R2) was concerned by the scale of gambling that would be created by a large casino. Current gaming facilities provided by the two existing casinos – 12 gaming tables and 20 slot machines – would be dwarfed by a large casino with 30 gaming tables and 150 slot machines (Gambling Commission, 2009, GYBC, 2006b, OPSI, 2008b).

According to the cultural planner, 'culture in Yarmouth is very low' (R2), but he contradicted himself on casino development saying 'it would be completely be alien to everything else' associated with the culture of the resort (R2), though he was unaware of the other gambling activities and games on offer. He also felt that 'people who come to Yarmouth haven't got that much money' (R2). The spatial strategist agreed, saying that the current demographic 'may not be the sort of people that would typically go and gamble at a reasonably high-class, twenty-first century casino' (R4) and that there might be a conflict with traditional family

holidaymakers: 'It seems to me questionable how a facility like this functions in a relatively stand-alone way to achieve its intended outcomes' (R4). If the visitor demographic changes will the cultural templates change too? The same planner (R4) thought that 'to an extent, it's partly how the place is perceived locally and how it's managed'. This highlighted a perception that a large casino might symbolise greater acceptance of gambling and therefore attract 'people from the surrounding area who may be more vulnerable to gambling and that sort of thing' (R4). This signals two potential scenarios, where the local cultural template could absorb casino gambling as a normalised practice accepted by the traditional low-budget holiday market, and an expansion of up-market casino gambling attractive to a new higher-spending visitor, which would alienate locals and traditional visitors.

To conclude, interviewees thought that a large new multiplex would fit in with the existing resort culture and complement its arcades, casinos, racing and other forms of adult entertainment, but also agreed that there might be conflict between the family visitor demographic and the new higher-spending visitor that casinos would attract. Furthermore, two interviewees thought that a large casino could be detrimental to social regeneration as it would, by its sheer scale symbolise widespread acceptance of gambling.

7.10 LIMITATIONS OF REGIONAL AND LOCAL CASINO POLICY RELATIONSHIPS

There is evidence that national, regional and local policies would be harmonised by casino development in Great Yarmouth (1st East, 2007, EEDA, 2008, 2010, EERA, 2004a, 2005, GOEE, 2008, GYBC, 2008a, 2009a). However, those interviewed at regional level had not been directly involved in policy formulation or consultation relating to casino development (R1, R2, R4), but did have indirect knowledge of casino regulation from when national regulations were being drawn up and local authorities were being invited to submit bids to become licensing jurisdictions. The first draft of the 2004 spatial strategy stated that government regulation was changing and that casinos could be developed in towns and seaside resorts to benefit economic growth, regeneration and tourism (EERA, 2004c). This put casino development on regional spatial, economic and tourism policy agendas, but the aspirations were shallow on detail. In particular, there has been a lack of comprehensive impact assessment or research at this level, and again, as with Scarborough, policy has been formulated without evidence. An assessment of the impact of casino development on inward

investment was not conducted as part of the RSS, nor was this included along with the social and cultural impacts envisaged in the sustainability appraisal for the RES (EERA, 2010). An excuse for the lack of casino impact detail was made by the regional planner, who explained that 'because we're still talking about higher-level development scenarios and growth levels for the region, that sort of level of detail hasn't been discussed, but it will be very shortly' in a later review (R4). This is important, because the impacts, whether economic, social or cultural of casino development, are portable in a regional and sub-regional context through job creation, new investment and visitor profiles, as well as through negative social impacts and costs.

In summary, while regional and local policies have been harmonised and support casino regeneration, the impacts have not been properly researched. This may have both positive and negative long-term effects on regeneration in Great Yarmouth and the rest of the region, since only the economic benefits have been addressed, but even these have been under-assessed than is usual in policy-making terms. Social and cultural impacts as well as changes to place identity have been ignored, which indicates that casino regulation has been interpreted as an economic regeneration tool only. To explore these issues further, local perspectives of casino development will be explored next.

7.11   LOCAL PERSPECTIVES ON CASINO DEVELOPMENT

In line with national legislation, Great Yarmouth Borough Council (GYBC) adopted a new gambling licensing policy in January 2010. Unlike Scarborough, the council did not provide a list of community and tourism assets they wanted to see in developers' licence bids (GYBC, 2009b, SBC, 2009b) and, by the end of August 2010, GYBC had still not put licences out to public tender. Interviewees from Great Yarmouth did not throw light on the pace of the premises licensing process, but their comments in relation to casino regulation and regeneration, tensions within the casino development process and the compatibility of casino development with the resort town are all explored. The interviews included policymakers from the local authority (LPM1, LPM2) and the 1st East Regen Company (LPM3), local politicians (one in cabinet – CON1 – and one in opposition – LAB1) and business people involved in tourism (BIZ1, BIZ2), two local historians (HIS1, HIS2) and community and voluntary-group representatives (COM1, COM2, COM3).

7.12   CASINO REGULATION AND LOCAL POLICY INTEGRATION

In general, the potential regeneration and community benefits of casino development have been carefully crafted by GYBC and 1st East to dovetail into policy documents on economic development, tourism and regeneration (1st East, 2006a, 1st East, 2007, GYBC, 2008a, 2009a, 2010). In effect, casino development benefits that focus on job creation, extending the tourism season, increasing local leisure provision and re-branding the resort to attract up-market visitors has been integrated into the borough's spatial, economic, tourist and community policies.

However, all the policymakers and a cabinet councillor were critical of casino regulation (CON1, LPM1, LPM2, LPM3). Casino development is very different from the usual regeneration strategy of using public, or public-private, partnership funding to regenerate an area where physical aspects can be balanced with economic and social ones. Social considerations were lacking in community policy. A local councillor and a senior council policymaker thought that a privately funded regeneration policy 'being parachuted in' (CON1) meant that casino developers' may disregard social impacts and their conceptions for the representation and identity of a new casino may, both hard to dovetail with public policy (LAB1, LPM1).

The two-tiered premises licensing competition, where land-use decisions are not taken into account until the process has been completed, caused the most concern amongst policymakers (LPM1, LPM2, LPM3). Local planning documents and regeneration projects in the pipeline were said to be in limbo, dependent on the casino conceptions and spatial requirements of the competition winners (CON1, LPM1, LPM2). According to a senior policymaker, three developers who had options on the redevelopment of the main seafront area (GYBC, 2007a) – the Golden Mile – before the casino process began in 2007, later insisted that any re-development would be contingent on winning a casino premises licence (LPM1). The impact of the licensing process on the Golden Mile development was devastating and had halted a major regeneration project through 'a whole raft of process changes that we've had to incur [sic] about how we redevelop the main tourism centre' (LPM1).

Integrating casino regulation has cut across the usual planning system. Developers' interpretations of a casino space that can be presented in a licensing competition and its spatial requirements have left policymakers wondering how to incorporate an unknown footprint and location into spatial policy. Planning for the future and having to integrate a far-reaching licensing process that does not involve a sequentially planned spatial approach – as well as potential Section106 agreements – was voiced as a problem. 'Planning is [treated as] a completely separate issue…it's just about the worst piece of legislation I've ever seen drafted' (LPM1). Another policymaker stated that AAPs for the new regional-local planning system would have to be re-written to incorporate the winner's casino. This is complicated as suitable leisure and other sites may have already been allocated for other uses (LPM2). One policymaker described it as 'a complete and utter disaster in terms of the way the government handled it from the beginning and we haven't reached the end yet' (LPM3). Planning and spatial requirements for casinos have been separated from licensing issues, but they are not considered as different by planners since both affect land-use planning (LPM2), an issue that was not considered by the new planning system (GYBC, 2009c, LPM2). In this case, local policymakers were far more critical of casino regulation and its intersection with the planning system than in Scarborough.

In summary, national casino legislation has been integrated into local economic, tourism, spatial and community policies, but has not been fully thought through and has created problems related to spatial planning and economic policy. Linking a privately funded regeneration strategy to a contested social practice was seen as flawed in terms of balancing the regeneration equation, on account of the economic and conceptual motives a casino developer would focus on, in contrast to a public or public-private partnership that would balance issues of economy, society and place. Furthermore, the social impacts of casino regulation have not been considered as part of community policy, although the latter advocated casino development, and the licensing competition process, which determines questions of casino footprint and location, has delayed implementation of the Planning and Compulsory Purchase Act 2004 (OPSI, 2004).

7.13   CASINO REGENERATION AND TOURISM

Great Yarmouth already has much to offer those interested in gambling. Besides the usual bookmakers present on most streets in the UK, as described earlier, the town offers many

other forms of gambling including 14 adult entertainment centres and amusement arcades in or near the seafront (GYBC, 2006b). The town has aspirations to revitalise its tourism facilities and visitor numbers, with ambitions to reach £650 million in annual tourist receipts by 2016 and to increase employment in the sector by 12 per cent, providing more job security, career prospects and local skills. It is also intended that the tourist season will become year round and that the town will project a lively and fun image (GYBC, 2006b, 2007b) that will attract both the traditional family and new, higher-spending visitors including gamblers (GYBC, 2007b).

Plans to add a large casino were perceived as both positive and negative by interviewees. Many of the positive comments fitted in with the current tourism strategy to regenerate the town (GYBC, 2006b, GYBC, 2007b), with casino development seen by many as a way to deliver more tourism and associated ancillary jobs (COM1, LAB1, LPM1, GYBC, 2007b). However, there was scepticism as to what kind of jobs a casino would create, and whether these would be filled by local people or improve the local skills base (LAB1, LPM1). Unemployed people with families may not find casino employment opportunities suitable since casinos are busiest at night and during the early hours, but new capital projects such as a casino could also promote a more vibrant night-time economy, which at the moment 'is as dead as a door nail' (LPM1).

Investment targets in the tourism strategy are clearly aimed at modernising facilities (GYBC, 2007b) and reversing its image as a 'rundown seaside resort' (HIS2), and several interviewees agreed that an appropriate casino space on the seafront would provide a catalyst for change (CON1, LAB1, LPM2, HIS1, LPM2, CON1, LAB1, BIZ1, BIZ2, LPM1). However, business people, politicians and a policymaker also stated that a casino should be developed alongside other facilities relevant to both visitors and residents, including a quality hotel (BIZ1, BIZ2, CON1, LAB1, LPM2).

In order to achieve tourist receipts of £650 million, it will also be necessary to broaden the visitor profile. Specifically, a new market described as 'fun gamblers' (couples or groups over 25 wanting a flutter) has been targeted for the casino (GYBC, 2007b), but this would dependent on the how the representation and identity of a new casino space would appeal to that market. A local historian (HIS1) thought it unlikely that Great Yarmouth would be able

to attract 'casino players' because of the town's peripheral location. One cabinet member was not even sure if a new casino 'would be a boost to the town. I don't think anybody knows', (CON1) and both politicians were sceptical that a large casino would 'add on value for the town' (CON1, LAB1). These views underline the experimental nature of large casino development.

Created at a time of economic prosperity, national regulation did not include economic impact tests (CAP, 2007a, LPM2). According to a senior council policymaker, economic and community benefits were perceived as 'a bung' by central government in exchange for granting a casino premises licence in perpetuity (LPM1). He thought government had assumed that the strategy would catalyse regeneration 'like dropping a soda crystal in a bit of Jell-O', solidifying everything around it (LPM1). Both he and the cabinet member felt concerned about 'cash or kind' benefits that might be offered by developers during an economic downturn (LPM1, CON1). If there is only one bidder for the licence, it would have to be issued even if the benefits fell short of what the borough considered fair exchange for granting a licence into perpetuity (LPM1, CON1). 'What a load of cobblers that is,' said the cabinet member (CON1) while the policymaker referred to it as 'garbage, really' (LPM1).

However, others were confident that the town would be able to attract a greater gambling audience (BIZ2, LPM2), with one policymaker noting that it would give the resort a competitive advantage (LPM2). But some (LPM1, LPM3, COM1, COM2, HIS1) felt that the market was limited due to the number of existing outlets, and that it would depend on how visitors perceived the different conceptions of the town's casinos. The historian thought the traditional family was unlikely to be interested in casinos (HIS1). There was agreement by many that the current volume of visitors will not be able to support more casino capacity (BIZ1, HIS1, CON1, COM1, COM2). A local businessman reported 'concern amongst [current] casino operators' (BIZ1) about over-capacity. There was also a feeling that the two old-style casinos would not be unable to 'survive in the same format' (LAB1), and that during the winter months all the total amount of tables would not be 'used to capacity' (CON1).

According to a policymaker (LPM2), concerns have also been expressed about 'threatening or damaging business as it stands', especially those on the seafront (LPM1), and some

thought that this might have a negative effect on growth with possible property voids on the Golden Mile creating a negative image (BIZ1, COM1, LPM1, LPM2). However, an opposition politician commented that Great Yarmouth's tourist industry was 'always looking for the next thing to take on' (LAB1) and that change is part of the adaptive local culture (LAB1). Changes have always been incremental 'and when they haven't worked they say change it to something else' (LAB1). This statement complements the tourism strategy that calls for Great Yarmouth to be a dynamic holiday destination (GYBC, 2007b).

To conclude, the town's aspiration to increase receipts through casino expansion was supported by policy. However, there were concerns that the strategy was experimental in terms of how to secure economic and community benefits and success would depend on the projecting the right representation and identity to be appealing to high-spending visitors. Some interviewees also thought that a casino development should complement other tourist facilities and that the town should not be reliant on a contested activity. Other concerns focused on problems caused by displacement of existing facilities and businesses, which might thwart the physical regeneration that the InteGREAT project had already brought to the primary tourist area. Despite this, many felt that the town had a strong entrepreneurial spirit and had already embraced the casino strategy as a way of regenerating tourism prospects.

7.14   SOCIAL AND MORAL TENSIONS IN CASINO DEVELOPMENT

As pointed out there are social concerns over casino expansion. Two community representatives were concerned about gambling becoming a problem for people with little money, and that if considered unsuitable might be denied access to other leisure activities in a representation that offers them (COM1, COM3). This would create two tiers of leisure opportunities in the town, which would conflict with the local community strategy (COM1, COM3, GYBC, 2008a). Neither casino regulation nor community policy addresses the issue of exclusion from the cultural and leisure facilities of a large casino (GYBC, 2008a, 2009b, 2009c). One community representative stated that he was 'not sure if vulnerable people will be encouraged or welcomed at these places' (COM2).

Although creating more jobs may aid the local multiplier to help close the inequality gap, community representatives frowned on the idea of expanding casino gambling in an area needing regeneration (HIS1, HIS2, COM1, COM3). The cabinet member responded saying

'there is a policy in the document [local gambling policy] itself that will cover the problems they anticipate' (CON1), but a community representative voiced concern about the voluntary self-exclusion policy used by the council, suggesting that it should be go further in protecting vulnerable people (COM3).

Family was another issue. According to a policymaker at 1st East, a new casino would be family oriented and female friendly (LPM3), though this makes assumptions about what developers will produce. Church organisations, in particular, were concerned about the effect of casino expansion on families (COM3), and some maintain that it can also lead to child abandonment (*Sydney Morning Herald*, 2009). As the community strategy calls for a reduction in child protection orders (GYBC, 2008a), interviewees were asked about arrangements for children abandoned by parents due to gambling. Most were unaware that such an issue existed, saying that it had not been included in either gambling or community strategies (COM2, COM3, CON1, LPM1, LPM2, LPM3, GYBC, 2008a).

A senior policymaker also disputed the government view that 'casino equals regeneration equals good' (LPM3), and a local historian (HIS1) highlighted the problem of small-stake problem gambling amongst the young, warning that casino expansion could lead to youngsters turning to high-stake gambling due to the displacement of low-stake arcades.

The morality of gambling was also an issue for a community representative, historian and opposition politician (COM2 , HIS2, LAB1). The scale of a new large casino would create a significant cultural reference that gambling is an acceptable activity, and "local people don't like the idea" (HIS2). It is clear from local licensing policy that gaps and detail exists on social issues. How the council will carry out their duty of care to vulnerable residents who are not dealt with by casino operators is unclear.

In summary, the social impacts of gambling have not been fully addressed in policies and certain sectors wish to see greater social regulation. There was a perception that the local authority had foisted its duty of care onto casino operators. It is likely that commercial objectives will take precedence over social agendas, as has been evident at the national level. Local licensing policy does not address the council's responsibility for its vulnerable residents or visitors. The neo-liberal principles of free choice and personal responsibility

(exercised by individuals and developers) have been given precedence over social responsibility that is expected to be exercised by the council. Furthermore, an up-market casino might result in two tiers of leisure provision, which would conflict with the local community strategy on inclusivity.

7.15   CASINO CONSULTATIONS

This section explores the consultation processes on casino development in Great Yarmouth, which has been on-going since July 2006. The process started with two simultaneous applications. One made by Pleasure Corp, the owners of the main seafront attraction Pleasure Beach, to the council for a casino, hotel and leisure complex on a seafront car park site on the Golden Mile (GYBC, 2008c, 2008d).[26] The other by the council to host a large casino. Permission was granted to Pleasure Corp for a large multiplex development that would have dwarfed the other nearby tourist facilities, and the site was named by the council as its preferred location in their jurisdiction bid to the CAP. The development never went ahead due to premises licensing competition restrictions (GYBC, 2006b, 2008c, CAP, 2008). The project was re-activated in early 2008 on a larger scale, after Great Yarmouth became a licensing jurisdiction (CAP, 2008). Details of the July 2006 applications are not discussed here. Rather, the examination of local consultation begins with the council requirement that developers undertake community consultation prior to submitting a major planning application (BIZ2, GYBC, 2008e).

In December 2007, prior to the official casino jurisdiction announcement in January 2008, a planning consultancy appointed by Pleasure Corp and its casino partner Aspinals carried out an exhibition-based community consultation exercise. The project was known as The Edge (GYBC, 2008e) and was a plan for a new physical and cultural reference point on the Golden Mile. It included a casino, hotel, bowling alley, multiplex cinema, bars and restaurants, to regenerate the adjacent South Denes area. Questionnaires were filled out by over 100 respondents, of which 88 came from the immediate area (GYBC, 2008c). Sixty-six per cent regarded casino development as very important or important for improving leisure facilities, and the council reported overwhelming support and a general perception that the development would halt visitor and resident leakage from the town, especially in the evenings (LPM1). Other facilities – a theatre, shopping facilities, a swimming pool, ice rink and

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[26] Albert Jones, managing director of Pleasure Corp won the large casino licence competition with The Edge scheme. It was announced by GYBC on the 27th April 2012 (Great Yarmouth Mercury, 2012).

children's play facilities – were also suggested by respondents (GYBC, 2008c), although the developers made no changes to the scheme. This was evidence that local people were at odds with the motives of casino developers. The results of the consultation were submitted as part of a new outline planning application in June 2008 (GYBC, 2008c).

Running parallel to the planning application, but before Great Yarmouth was awarded large casino jurisdiction status, was an internal council consultation on the regeneration benefits that should be included in casino bids (GYBC, 2009b, LPM1, LPM3). Tensions were noted between aspirations for regeneration and the deliverability of these aspirations, based on advice from experts on the impact of deliverables and the potential for conflicts in the competition process. According to policymakers, this exercise was aimed at informing the new local gambling licence policy and its licence-awarding criteria, and associated processes partly aimed at avoiding litigation from competition entrants at a later stage (LPM1, LPM2). A consensus was reached on benefits that might be accrued by developing a large casino (LPM1, LPM2), with councillors and officials reported to be '100% for it' (CON1).

In 2009, the council ran another consultation exercise aimed at casino developers and other stakeholders on the specifics of the draft policy. In September 2009, written feedback from the Rank Group and Aspinals, community organisation START and a local seafront businessman, as well as the fire, police and planning departments, was published. Clarification on details affecting licensing, regeneration benefits, casino location and social issues were sought (GYBC, 2009d), following which a public consultation was carried out by the council on the full gambling licence policy. Comments were received from the Rank Group, their solicitors, the Broads Authority and Norfolk Police (GYBC, 2009e).

From the responses published, there appears to have been an absence of significant community involvement or comment (GYBC, 2009d, 2009e). According to a businessman representing town centre retailers, they [retailers] had not been fully engaged with (BIZ1), though others stated that the local community were happy with the consultation exercise but felt that more problem gambling solutions needed to be reflected in local policy (LAB1, LPM1). However, three community members were not even aware that a public consultation had taken place, despite sitting on the local strategic partnership board (COM1, COM2, HIS2). One community worker thought it was a box-ticking exercise and kept deliberately

low-key to avoid conflict with community groups (COM1). When pressed on the consultation with community groups, whose main concern was problem gambling, the cabinet member stated, 'Yarmouth has already got two casinos and those questions have been answered in the past. I think we have all the angles covered' (CON1). Clearly, the council was more interested in the positive effects of casinos than the negatives ones, and would be relying on operators to address the negatives (LAB1, LPM1).

In short, there was evidence that the design of the 2009 public consultation led economic motives to cut across social regulation in the consultation process. Although stakeholders in the local council supported a large casino, views on social regulation by community groups had not been taken into account. One explanation for the council's low-key approach was that it had already received tacit public support for casino development from The Edge consultation, although only 100 responses were recorded. Overall, however, it suggests that a bottom-up decision-making process had not been thoroughly conducted, and that, as with Scarborough, the council had not been proactive in reaching all stakeholders and aims for regenerating the economy, society and place were not balanced.

7.16   LOCAL VISIONS FOR A CASINO AND ITS LOCATION

In this section interviewees comment on how they envisaged a new casino and its location. This is informed by the local authority's view that a new casino should project a positive image among locals and visitors and act as a catalyst for economic, social and cultural regeneration (GYBC, 2006b).

These aspirations were to be achieved by creating a new physical landmark and cultural reference point in the primary tourist area. Although issues such as visitor demographics, casino and other gambling capacity, and social and moral concerns about casino expansion, have been highlighted earlier in this study, it is clear that most interviewees were in favour of a large casino.

In terms of the representation that would deliver most benefits, most interviewees chose a Type 3: Casino Multiplex, which had already been tacitly approved by the public and council through The Edge project (GYBC, 2008c, COM2). Some thought that if it included conference facilities, a multiplex would attract a new type of business visitor (BIZ1, COM1,

HIS2, LPM1), as well as up-grade the resort, improve leisure facilities, provide employment and boost the night-time economy (BIZ1, COM1, HIS2). It was also thought that a multiplex would prevent leakage of money to cinemas and other attractions in Norwich (BIZ1) and provide a year-round family entertainment destination (BIZ2, COM2, LPM3). However, a minority of interviewees advocated the smaller Type 1: Standalone Casino or Type 2: Hotel Casino (BIZ1, COM2, HIS1), on the grounds that it would be less likely to cause job and business displacement than a multiplex. The local cabinet member felt it important that any ancillary casino facilities should not replicate what was already on offer on the seafront (CON1).

Several policymakers commented that only a multiplex would be profitable for casino operators (LPM1, LPM3) and would therefore be most likely to be included in a competition.[27] However, another policymaker thought that the activities of a multiplex could be curved up and spatially relocated across the town. (LPM2). A colleague maintained that there are two multiplex identities on offer – The Rank's neon lit, mass-appeal (Las Vegas-style) 'where there's a lot of Cs and Ds' versus the Pleasure Corp/Aspinals' smart Bond-esque type much like the current Grosvenor Casino on the Golden Mile, that would 'attract the As and B's…spending £110 per head'. A community worker (COM1) agreed that this last type could attract the new visitor demographic targeted by tourism and economic policies (GYBC, 2007b), but a policymaker thought the traditional blue-collar visitor may prove a hindrance to changing the image of the town (LPM1). A local businessman and historian also thought it important that a new up-market attraction was sensitively integrated into the urban fabric and historic traditions of the town (BIZ1, HIS2).

Local gambling policy states that casinos must be located within the town centre or seafront areas (GYBC, 2009c). Five potential sites within these areas were mentioned by interviewees (Map 2, p117). First was the Town Hall, which divides the North and South Quays and is situated on the River Yare close to the central retail area. The senior policymaker (LPM1) maintained that 'an interested party' had already thought of converting this into a casino and hotel. The second choice was to develop brown-field sites within the 1st East regeneration area where the Yare and Bure rivers merge, as mentioned by both business people and the policymaker from 1st East (BIZ1, BIZ2, LPM3). The Mint Casino in the town centre, was

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[27] Etches (2010) in his research on casino policy in the UK, stated that on average only 1% of total earnings (before tax, amortisation and depreciation) are achieved in profit terms from provincial casinos.

also mentioned by two interviewees (BIZ1, LPM1), as well as a further two sites on the seafront – the Marina Centre, a local leisure centre situated on the Golden Mile, and the car park site used in the planning application for The Edge (GYBC, 2008e) next door to Pleasure Beach (LPM1).

The high visibility of Pleasure Corp/Aspinals' multiplex application may explain why locals perceived a Golden Mile location as most suitable since it was 'the most mature proposal' (LPM3). The site was seen by many, including the policymaker at 1st East, as offering the greatest potential for regeneration through providing a new landmark at the end of the promenade (BIZ1, BIZ2, COM1, COM2, LPM3). It was also thought this might help regenerate a deprived area just beyond the site and re-invigorate interest in the historic Nelson Column landmark and other naval traditions (COM2, HIS2, LPM2, LPM3). Two policymakers thought the site would complement work already done in the area (SHARPE project) and provide a catalyst for the development of brown-field sites along the South and North Quays (LPM2, LPM3), possibly providing a haven for a new visitor demographic uninterested in 'bucket and spade' activities (LAB1). Situating a casino at the end of the Golden Mile could also separate this market from the night-time economy based around cheap drinking on the seafront. However, two interviewees felt that a casino located anywhere on the Golden Mile would complement the InteGREAT project and provide a further link between the town centre and seafront (CON1, GYBC, 2007b, LPM2).

In conclusion, most interviewees thought a Type 3: Casino Multiplex would provide the best regeneration outcome, but felt that it needed to include a variety of facilities to appeal to both visitors and residents. It was also widely agreed that a casino would need to be based on a model of profitability rather than on just facilities wanted by residents. In terms of identity, location played a part. Social regulation issues and the high visibility of The Edge multiplex plans caused most interviewees to recommend the car park site at the end of the Golden Mile for a Bond-esque casino that would separate an up-market audience from the main promenade, whilst regenerating the adjacent area. This would also help promote the historical maritime character of the resort.

7.17   CULTURAL COMPATIBILITY: THE RESORT AND THE CASINO

This section examines the relationship between the resort culture of Great Yarmouth and casino expansion, as revealed by interviewees' perceptions of the resort's image. It considers the impact of a new casino, and the deeper cultural meanings embedded in the local community. According to the cabinet member, there are stark cultural contrasts within the town (CON1), represented on one side by Protestant descendants of an historic international port community (HIS2). Somewhat isolated from Norfolk by the marshes and from East Anglia by the Broads, the original port community was said to be self-reliant and innovative, with a proud history of international trading, fishing and naval heritage (HIS1, LAB1). New values of consumption were introduced by Victorian and Edwardian entrepreneurs, who helped developed the resort (HIS1), while blue-collar families from the traditional catchment areas of the Midlands, East Anglia and London who visited the town added another side to local culture (LPM1). From the 1960s, visitor numbers declined, and popular seafront attractions such as the circus, variety shows and theatre died away (HIS1, HIS2) to be replaced by less labour-intensive entertainment in the form of electronic arcades (HIS1). The town has largely maintained its image as a blue-collar resort characterised by traditional bucket and spade entertainments (HIS1), and there is an opinion locally that 'culture in Yarmouth is very low' (HIS1, LPM1). This is 'reflected in what you see around you…chip stalls, ice cream and burger bars and kebab houses...you won't see fancy restaurants on the seafront' (LPM1). According to a community representative, the night-time economy revolves around cheap alcohol and stag parties (COM1). Attempts to up the cultural ante have fallen short of expectation (HIS1).

It was thought by a local historian and a community representative that the expansion of gambling in the town would detract from the historic image it was now marketing as part of its cultural heritage (COM2, GYBC, 2005, HIS2). However, most interviewees were positive that casino development would be complementary to the culture and character of the resort – 'It fits in with the same idea' of arcades (LAB1). But others pointed out that the resort's former Victorian and Edwardian grandeur had fallen victim to 'whole ground floors being taken away by one-arm bandits' (LAB1) and that purpose-built attractions had been badly converted to other facilities (HIS2).

One historian also commented that a large casino might be overbearing (HIS2) – 'I don't think people have comprehended what scale that can be' (CON1). How a large casino complex would alter the traditional resort culture and affect the balance between day and night-time visitor's remains to be seen. However, an aspiration also exists within tourism and cultural strategies to provide more naval and natural asset based experiences (GYBC, 2005, 2007b), and to re-brand the town as a gateway for the Norfolk Broads. In this context a large casino would help create a new visitor profile: 'We're trying to raise the stakes to a different level' (LPM2) by providing something complementary to the resort culture, represented by the cultural mix of a multiplex (LPM1, LPM2). A large casino and entertainment complex 'is actually the next logical step' stated another policymaker (LPM3), though a casino may not be the best catalyst for cultural change. According to a senior policymaker: 'It's a very entrenched and developed' blue-collar holiday destination (LPM3). Hence, both politicians saw a new casino development as an experiment to get different people into the town by expanding many of the facilities already available.

In conclusion, a new casino was seen as complementary to the blue-collar facilities already existing, but some warned that the scale of the development may be too large for an experimental policy. Many policymakers also saw the development of a large casino as an opportunity to create a new tourist market by promoting the town as a gambling destination. However, this ambition will need to take account of the differing cultural images projected by different casino representations and identities and how specific cultural groups will read these alongside other cultural regeneration images.

7.18   CONCLUSION

Great Yarmouth's regeneration programme has already shown results. The East Port outer harbour, as well as InterGREAT, SHARPE and other regeneration projects, have gone some way to regenerating the town, its image and tourist facilities. However, decline has been exacerbated by the growth of cheap accommodation in peripheral areas and continued reliance on the low-spending family-holiday market.

National casino regulation has also been well integrated at regional and local levels through incorporation into the RSS and RES, and into cultural, community, economic, spatial and tourism policies. While many saw gambling as socially acceptable, others were concerned

that the expansion of the spatial practice of casino gambling would create additional problems in a town already suffering from social dysfunction, and many wanted to see further social protection built into casino regulation. However, there was little evidence that interviewees were morally regulation against casinos, and most recognised that a large casino would stimulate employment and the economy and attract a wider visitor profile.

National regulation describes a large casino as having ancillary facilities such as bingo, pari-mutuel betting,[28] and non-gambling activities such as a hotel. However, in contrast to Scarborough, the language used in Great Yarmouth's description of required benefits in casino regulation is loose, leaving room for innovation by developers. Most interviewees opted for a Type 3: Casino Multiplex, possibly due to plans submitted in 2006 by Pleasure Corp/Aspinals for an up-market Bond-esque casino (The Edge). Several interviewees felt this reflected the town's entrepreneurial spirit and would appeal to a new visitor market.

There was also widespread approval among locals for regenerating one of the central brown-field sites, such as that planned for 'The Edge', or another site near the Golden Mile. However, the scale of a multiplex was not fully understood by most interviewees. The potential to add up to 150 high-stakes slot machines to the hundreds of lower-stake machines already provided in the town was not a cause for concern, but some felt that greater gambling capacity might displace existing casino and arcade businesses.

What is not evident from national and local casino regulation is how a casino 'fits' culturally, which has been left to the casino industry to decide. An interviewee revealed there were two different perceptions of casino identity: the mass-market, neon-lit, Las Vegas type (Rank Group) and the more European, Bond-esque style (Pleasure Corp/Aspinals), with consensus for the Bond-esque identity, but that it should convey the maritime history of the town. Nearly all interviewees saw the casino as a cultural addition to the town, which would help create a new image. However, tourism policies also express the aim to attract a higher spending visitor. Since the existing small casinos and other gambling facilities already attracts some of this market, a Bond-esque multiplex casino might further differentiate this market.

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[28] Pari-mutuel betting is an activity whereby bets are taken at an off-site licensed venue for events such as horse racing. The total of the pot taken by the off-site location is then divided up between the off-site winners and losers based on the result of the outcome. The actual odds at the race course are not taken into account in this system.

Table 11: Great Yarmouth casino policy and development perceptions summarises regional and local interpretations of national policy, and interviewee perceptions of suitable casino types and locations for Great Yarmouth.

Table 11: Great Yarmouth casino policy and development perceptions.

Resort	Theme	Regional Perspective	Local Perspective
Great Yarmouth	National Casino Policy Perceptions	Seen as un-tested top-down economic strategy to support economic regeneration. Sidelines tourism market research and concerns on over capacity and biz displacement. Cultural impacts not considered. Provides honey-pot to re-image and up-date resort to attract a new market. Regional tourism planners not consulted by DCMS or local authority. Regional tier as policy conduit only. Ideological underpinning unsound by linking regeneration to gambling. Cause of social problems.	Potential for private funders of casino regeneration objectives being at odds with public policy. Concerns on amount of benefits offered in economic downturn. Potential for displacement of other casinos/adult entertainment. Over capacity worries. Policy does not fully address social impacts. Casino as regeneration signifier promotes further investment. Economic focus of policy to encourage visitor and jobs growth. Spatial requirements that are separated from licensing is flawed. Re-imaging of destination. Free choice and unlimited access will encourage vulnerable to gamble. Casino strategy allows for local entrepreneurial spirit to regenerate tourism (night-time) reliant economy.
	National Casino Policy Integration	Integrated into RSS and RES as economic strategy. Compliments cultural aspirations in regional plans. Adds to tourism planning aspirations. Socio-cultural impacts not considered. No role for voluntary sector. Representation, identity and specific location not addressed.	Strategy fully integrated into local policies. License process flawed since land use plans considered in second phase of competition. Policy cuts across new planning system and holds up other regeneration and spatial plans. Low key consultation on casino.
	Casino Representations • Type 1: Standalone Casino • Type 2: Casino Hotel • Type 3: Casino Multiplex	Type 3 as it provides lots of facilities. Type 2 suggested as cloaking device to exclude and protect vulnerable.	Type 3 as it provides lots of facilities for visitors and residents. Type 3 provides a catalyst for further regeneration investment.
	Casino Identity	Abstract identity with modern edge that signifies a quality resort but connected to maritime history.	Bondesque identity but in a specific location.
	Casino Location	Golden Mile location.	Golden Mile but with Bondesque identity. Best located at end of Golden Mile to create up-market entertainment bubble.
	Cultural Compatibility	Complementary to the resort culture and myriad gambling outlets already on offer.	Large casino is complimentary to blue collar resort culture. Adds to current gambling provision and could create an East of England gambling mecca.

CHAPTER 8

8.1   TORBAY: A REGIONAL AND LOCAL PERSPECTIVE

This chapter examines the research findings for Torbay and reports on the strategy of using a small casino as a regeneration tool. Again, the case study is divided into three sections and begins by describing Torbay's socio-economic problems and how these been addressed through regeneration policy and by the various agencies responsible. A chronology of selected local regeneration projects with a cultural focus illustrates the work that has been carried out.

The second section explores casino policy, its implementation at regional and sub-regional levels, and opinions on these, in the context of policy integration considerations summarised in Table 2 (p40). The way in which casino policy acts as a regeneration catalyst is examined and followed by tensions over regulation at sub-regional level. This is followed by regional visions of casino representations, identities and suitable location suggestions, and the cultural compatibility and impacts of casinos on the resort culture. These issues are informed throughout by using the cultural regeneration policy analysis framework.

The third section focuses on local policymaking using the similar themes, but includes social and moral tensions attached to casino regulation. All sections seek to arrive at a better understanding of the objectives and issues that will be considered in the final chapters.

8.2   THREE TOWNS, ONE BAY

The three towns of Brixham, Paignton and Torquay are situated on Tor Bay in South Devon. They were administratively combined to form the Torbay County Council in 1968, Torbay Borough Council in 1974 and a unitary authority in 1998. In 2005 Torquay became one of only ten towns in the UK to have a directly elected mayor – Nick Bye, an independent candidate (Torbay Council, 2010b, 2010c). The mayor wields extensive executive powers, including direct control over areas such as local development and community strategy in local authority policy. This is a leadership role and the mayor's policies underpin the strategic approach to planning in Torbay. To change any of the mayor's proposals the full council must have a more than two-thirds majority (OPSI, 2000).

Torbay is also dependent on tourism for its livelihood. Like Scarborough and Great Yarmouth, the local population of approximately 134 000 has experienced the common effects of resort decline, as well as its own particular set of difficulties. According to the Audit Commission (2007), problems related to the traditional tourist economy, such as a significant increase in the population during the tourist season combined with a rising older resident population, has put pressure on services and house prices in one of the smallest local authorities in England. A shrinking younger population and loss of industry and low-level employment opportunities have compounded economic and social problems in an area with restricted road access to the more economically successful hinterland (Audit Commission, 2007). Torbay was ranked as ninety-fourth out of 354 authorities in terms of deprivation. Economic problems manifested in higher than average benefit claims in an area with the highest rate of job seekers in the south-west region (ONS, 2007) with only 56 per cent of the population of working age (Audit Commission, 2007, Torbay Council, 2010d).

According to the council, the main employment sectors recorded in 2006 were distribution, hotels and restaurants (37 per cent), public administration, education and health (32 per cent), banking, finance and business (13 per cent), with manufacturing dropping from 13 to 6 per cent over a ten-year period (ONS, 1997, Torbay Council, 2008a). A major local employer Nortel, manufacturing high-tech equipment, closed in 2000 with the loss of 5000 jobs. These figures illustrate the size of the service sector in the bay's employment profile, but according to the local authority the wealth generated by one manufacturing job equals that of three tourism jobs. This makes the manufacturing sector a far more desirable employer in terms of regenerating the local economy (Torbay Council, 2004).

The three towns have developed very different economies, tourism facilities and visitor markets around distinctive settings. In all, the three urban areas create an interconnected functional resort, but with three separate and unique urban and physical features (Torbay Council, 2004, Walton, 1983). Brixham is a high-density area due to its topography. Primarily a fishing town, it has a marina that employs approximately 1600 people and provides tourism facilities. The town is relatively low on accommodation facilities but does feature a quaint fishing village and harbour setting that includes a large fish market, seafront, quayside restaurants and other maritime cultural assets. Paignton, on the other hand, is located on partially flat land between Brixham and Torquay and has the best beach stretches

in the bay. As a family-oriented sun, sea and sand destination, it features a large pier, arcades and other traditional seaside facilities that are more dispersed than in Brixham or Torquay. Accommodation in Paignton is low-quality with a plethora of two-star hotels and bed-and-breakfast accommodation originally built to attract the Victorian middle class. The town is now mainly frequented by lower-income families and the elderly, and many residential homes have been built or converted from Victorian and Edwardian hotel stock.

Torquay is physically different, on account of its unique position between four hills, which provides a unique micro climate. Originally designed as a health resort for the upper and middle classes, it is also different architecturally, with grand late-Georgian, Victorian and Edwardian houses, hotels and amenities. The town now attracts retirees, residential-home patients, upper, middle and low-income families as well as night-time revellers. Torquay's facilities include a picturesque harbour, retail malls, award-winning restaurants, theatres, an historic pavilion, seafront promenade, four- and five-star accommodation as well as bed-and-breakfasts, lower-class hotels and residential homes. In addition, there is a plethora of harbour-side adult and family arcades and urban attractions, such as two cinemas, a large theatre, aquarium and the former Mint (now owned by Genting casino group) casino. Like Scarborough and Great Yarmouth, Torbay Council submitted a bid to the Casino Advisory Panel to become a large or small casino licensing jurisdiction (Torbay Council, 2006b), and received permission to grant a small casino premises licence (OPSI, 2008a). As regional and local interviewees perceived Torquay as the most suitable town in the bay in which to develop a new small casino, casino development will be explored in this context.

8.3   AN OVERVIEW OF REGENERATION AND PLANNING IN TORBAY

As with the other case study areas, national, regional, sub-regional and local efforts to stem decline in the locality have been the subject of particular policy foci (Table 12: Torbay national-regional-local policy timeline, p147). Besides generalised national policy frameworks, regional planning guidance (RPG10), an un-adopted RSS,[29] the RES, the *Devon Structure Plan* and local spatial, economic development and other policy documents articulate the bay's aspirations for regeneration (Devon CC, 2004, DTLR, 2001, SWRA,

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[29] The process to adopt a spatial strategy for the South West was held up by further investigation into the sustainability appraisal of the document and a legal challenge. The draft strategy was still unadopted in the run up to the last national elections. The new coalition government put all regional strategies on hold and to date the RSS for the South West has not been adopted to supersede RPG10 (DCLG, 2009b, SW Councils, 2010).

2006, SWRDA, 2006, Torbay Council, 2004, 2007a, 2007b, 2010e, Torbay Heritage Forum, 2004).

Similar to the other two case study areas, high priority has been given to regenerating the three towns including upgrading tourist facilities. To facilitate this, the council established a public/private sector partnership in 2004. The Torbay Development Agency (TDA) is a separate business owned and financed by Torbay Council that works with the local authority, county council and regional authorities to deliver economic, social and place specific regeneration projects (TDA, 2010, Torbay Council, 2009a). RPG10 set the framework for specific local plans (DTLR, 2001), which aimed to increase economic growth but also to diversify the tourism economy into new growth areas (DTLR, 2001).

These aspirations have underpinned regeneration policy in later regional economic strategies, sub-regional structural plans and local policy documents over the last ten years (Devon CC, 2004, DTLR, 2001, SWRA, 2006, SWRDA, 2006, Torbay Council, 2004, 2007a, 2007b, 2010d, 2010e, Torbay Heritage Forum, 2004). Sub-regionally, Devon's structure plan provides a development framework for the local plan. In terms of regenerating Torbay, strategic aspirations included defining Torquay and Paignton as the main areas of economic activity, while protecting tourist superstructure and increasing accommodation supply (Torbay Council, 2004). This seems at odds with the regional aspiration to diversify the economy away from dependence on tourism.

Adopted in 2004, the Torbay local plan spelt out the common and local problems of resort decline (Torbay Council, 2004), as well as the contraction of its fishing and agricultural sectors. The plan, which runs to 2011, details socio-economic strategies adopted by other cold-water resorts, focused on regenerating facilities and creating jobs. The aims here complement the county plan but, again, a strategy to diversify the economy is not considered a headline item in the local plan (Torbay Council, 2004). The regeneration plans for the towns were realigned in 2006 with the *'Mayors Vision'*. The document was intended to underpin the core strategy of the LDF (OPSI, 2004), and new community and corporate plans were created to complement this vision, which after public consultation were adopted in 2007 (Torbay Council, 2007a, 2007b, 2007c). Many of the regeneration priorities in the plan mirror those of Scarborough and Great Yarmouth.

Table 12: Torbay national-regional-local policy timeline.

Policy	Year	Description
DTLR: RPG 10	2001	Regional planning guidance for the South West
Devon CC: Devon Structure Plan	2004	County wide structure planning including economic, regeneration, transport and tourism plans
Torbay Council: Local Plan 1995 – 2011	2004	Local planning framework
DCMS: Gambling Act 2005	2004	Includes provision for new casino jurisdictions
SWRDA: Toward 2015	2005	Regional tourism strategy
CLG: New Growth Points	2005	National strategy for local growth and funding
SWRDA: RES 2006 – 2015	2006	Regional economic strategy for the South West
SWRA: Draft RSS	2006	Regional assembly draft of the regional spatial strategy
Torbay Council: Mayors Vision	2007	Strategic vision for community, economic development, regeneration & tourism
Torbay Strategic Partnership: Community Plan	2007	Plans to drive community regeneration, development and local economy
Torbay Council: Corporate Plan	2007	Council responsibilities to deliver Community Plan
Torbay Council: Draft LDF	2007	Development framework, action plans and site allocations
DCMS: Casino Distribution Order	2007	Names the new casino licensing jurisdictions
Devon CC: Tourism Strategy	2008	County wide role and action plan
English Riviera Tourism Board	2009	Torbay tourism strategy
Torbay Council: Gambling Policy	2010	Contains new casino section and regeneration criteria for licence bidders
Torbay Council: Draft LDF	2010	Unadopted planning framework
Torbay Council: Community Asset Transfer	2010	Policy to transfer council assets to community organisation use
Torbay Council: Joint Venture	2010	Policy to create LABV partnership with private developers

There was specific mention in all three documents of developing a casino in Torquay, though the community and corporate plans failed to specify a location (Map 3, p150) (Torbay Council, 2007a, 2007b, 2007c). Torbay's revised tourism strategy of 2010 acknowledged the achievement of securing a small casino licensing jurisdiction, 'which may assist a wider development' (Torbay, 2010e, p3), but was unspecific about location because earlier national casino regulation gave developers the right to choose casino sites in competition bids (DCMS, 2008). However, all the planning documents pressed for regeneration of Torquay's waterfront – the major attractor in the primary tourism area – through new tourist facilities (Torbay Council, 2004, Torbay Council, 2010, p3).

In 2007, the Audit Commission reported that the local authority had made advances in regenerating the economy and in increasing prosperity and inward investment. Physical regeneration in the three town centres was evident and employment had risen (Audit Commission, 2007). Regeneration is on-going and many projects have been delivered since the Audit Commission report by the local authority, the Torbay Development Company and community organisations. Funding for affordable housing, employment infrastructure, town centre, waterfront and harbour regeneration and local cultural and tourism projects have been completed or are planned, including development of a small casino (DCLG, 2006b, 2007d, 2007e, 2008b, 2009b, 2010e). Table 13: Torbay regeneration initiatives (p149); highlights some of the major cultural projects undertaken since 2005. It also highlights the importance of the tourism to the local economy and the dependence of the bay on tourism and facilities to attract visitors.

However, there are geographic constraints on regenerating the bay. These include a lack of brown-field sites that could be developed for employment use and high-quality business premises (Torbay Council, 2004). The closure of the Nortel plant in Paignton, alongside the decline in tourism and fishing sectors, has also added to a fall in business confidence and image problems (*Electronics Weekly*, 2008, Torbay Council, 2004, 2006a). At the same time, access to the town is problematic, with regional, sub-regional and local plans all calling for better road and rail links (Devon CC, 2004, Torbay Council, 2005).

Although Torbay council's response to regeneration included plans for casino development (Torbay Council, 2006b, 2007a, 2007b, 2007c, 2010e), this has not been fully addressed at

regional planning level. It was absent from the adopted RES in 2006 (SWRDA, 2006), but, as per national regulation, was included in the (unadopted) RSS drafted during the same period, which mentions allowing casino development in seaside and urban locations (SW Councils, 2010). Regional advice stated that regional and large casinos should only be developed in towns of strategic significance, such as Torbay. This was because of its labour supply and complementarity with other regeneration strategies. Regional advice also specified the need for local authorities to tackle negative social impacts and to monitor the economic benefits of casino development (SW Councils, 2010). However, mention was only made of regional and large casinos (SW Councils, 2010) and a U-turn in planning for casino development occurred after a review of the draft RSS in 2008, when the regional planning board advised removing the casino expansion strategy from the regional tourism strand within the RSS (SWRA, 2008).

Table 13: Torbay regeneration initiatives.

Project Year	Project Name	Description	Funding
2005	Heritage Economic Regeneration Scheme (HERS) Paignton	Improvement to commercial and residential properties in Paignton Old Town	£900 00 from Torbay Council and English Heritage
2006	Torquay Waterfront	Provision of heritage and tourism assets, 100 leisure berths. General regeneration of popular tourism area	£22 Million from Torbay Council, SWRDA, Whitbread, EU Objective 2
2006	Paignton Library	New library building	£6.4 Million from Heritage Lottery Fund and Torbay Council
2006	Torre Abbey Torquay	Restoration of major heritage and tourism attraction	£6.7 Million from Heritage Lottery Fund, English Heritage and Torbay Council
2007	Warren Barn, Cockington	Improvement of community sports facilities	£300 000 from Heritage Lottery Fund and Torbay Council
2008	Torquay Innovation Centre	Creation of business incubator and office units	£2.4 Million from Torbay Council, SWRDA, EU Objective 2 and SRB Fund.
2008	Sands Steps Torquay	Refurbishment of promenade and stairs to beach and sea	£441 000 from Torbay Council
2009	Royal Terrace Gardens Torquay	Restoration and improvements to visitor and community attraction	£2.77 Million from Torbay Council and CABE (Sea Change)
2009	Brixham Indoor Pool	Refurbishment	£1 Million from Torbay Council, Amateur Swim Assoc. and local community
2009	Bury Head Brixham	Improvement and new facilities for heritage visitor attraction	£1.7 Million from CABE (Sea Change) Heritage Lottery Fund and Torbay Council
2010	Brixham Fish Market	Regenerate fish market, extend quayside, build new restaurant and fishmongers	£20 Million from Torbay Council, SWRDA, EU Objective 2, Marine and Fisheries Agency

Sources: Torbay Council, CABE, Heritage Lottery Fund, SWRDA.
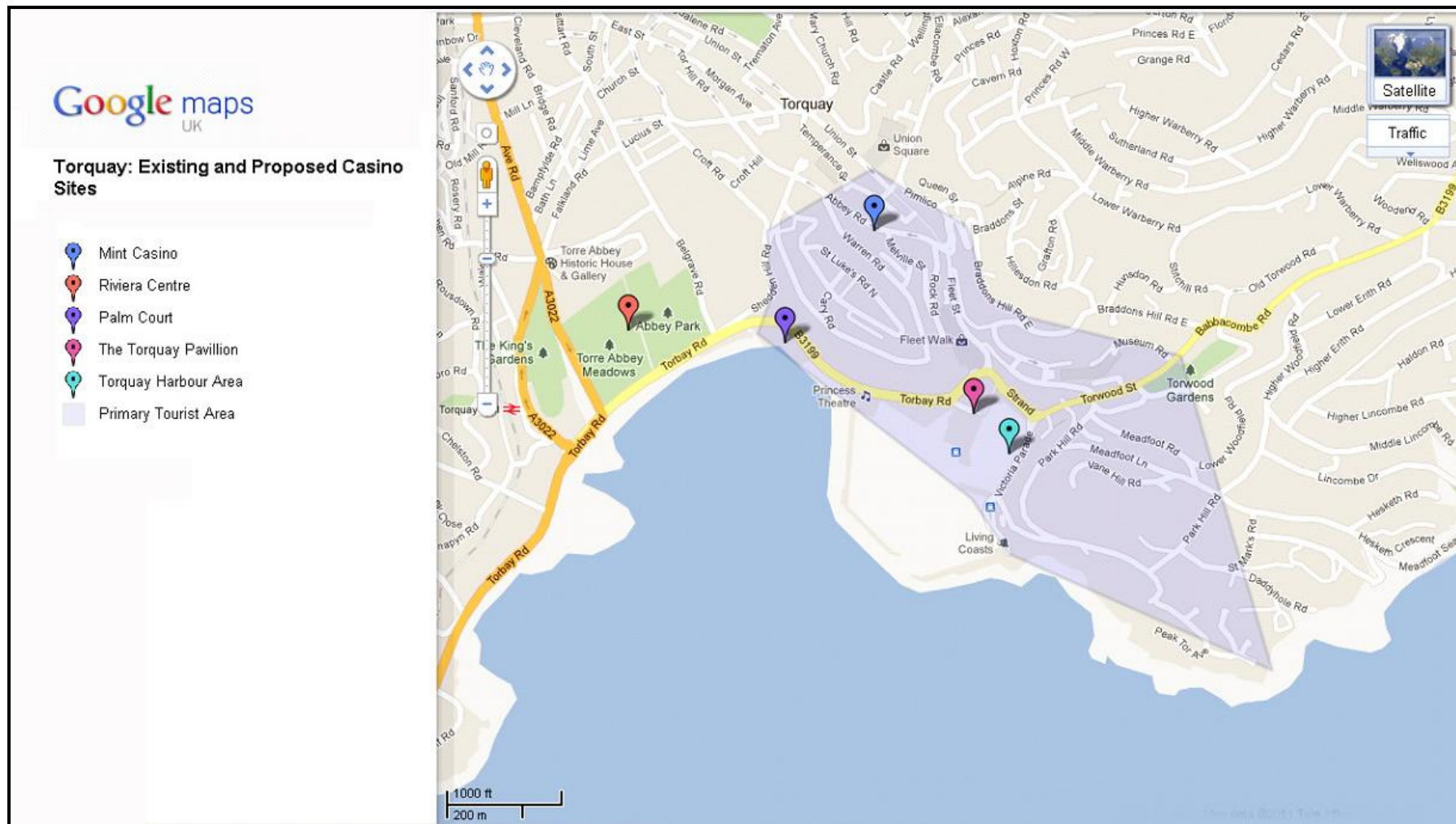
Map 3: Torquay: existing and proposed casino sites

Although small casinos were not addressed in regional planning documents, the local authority had already announced its aspiration to become a casino licensing jurisdiction in its application to the CAP (Torbay Council, 2006b). Since winning its bid, the council, as part of gambling regulation requirements set out a new gambling policy in 2010. This included the regeneration benefits they would like to see offered by a casino developer. Like Great Yarmouth, the benefits are described in an abstract fashion allowing potential licence bidders a larger framework to work within than in Scarborough. The benefit criteria state that developers are to be judged on how the development will contribute in direct (design, money contributions to community projects, increasing the tourism multiplier effect) and indirect (marketing the casino and enhancing the local area where a casino is developed) terms to advantage the local economy. It also asks developers to focus casino development on physical regeneration and tourism provision, while off-setting the impacts of increased gambling on the vulnerable and young within Torbay as a whole (Torbay Council, 2010f).

Alongside casino development, new policies have been devised to restructure the resort and its image, and to advantage the economy, society and place. Unused commercial properties owned by the council have been put on an asset list and community organisations can bid for the properties for community-based activities (Torbay Council, 2008c). In September 2010, the council launched a large LABV joint venture to regenerate six square miles of council property in the bay.[30] The land is earmarked for homes, commercial and retail property and is required to enhance visitor assets and the public realm (Torbay Council, 2010g). Acknowledging the excess of low-quality accommodation in secondary tourism areas, the council has been consulting on changing planning guidance for tourist accommodation. If guidance is changed it would allow the private sector to apply to convert un-used hotel accommodation to residential use (Torbay Council, 2010e, 2010h); this will increase housing supply and reduce the negative image created by low-quality accommodation.

This signals an about-turn. Tourism accommodation of all types was once protected, but through the *'Mayors Vision'* Nick Bye has set out a new economic development and regeneration agenda for Torbay. The mayor's new priority of upgrading the accommodation base will tie in with the tourism strategy of attracting a higher-spending visitor to support a new casino development. Although there are constraints on certain developments and forms

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[30] Local Asset Backed Vehicle is an arrangement where a local authority puts up council owned property assets as a 50% share in a joint venture. Private sector partner/partners reciprocate with a 50% investment to develop the sites (Torbay Council, 2010).

of regeneration in Torquay but not on others (secondary accommodation change of use), there are also signs that creative thinking by the mayor, the council and the development agency is pushing the regeneration agenda forward. However, these strategies may not be complementary to the regional and sub-regional plans adopted before Mr. Bye's election.

8.4   REGIONAL PERSPECTIVES ON CASINO DEVELOPMENT

As with the previous cases of Scarborough and Great Yarmouth, this section examines the perspectives of national and regional government, drawing on documentary sources and interviews. Interviews took place with a regeneration planner and a place-making planner from the South West Regional Development Agency (SWRDA) (R1, R2), a tourism development planner from South West Tourism (R3) and a senior manager from the sub-regional tourism board, Visit Devon (SR1). Interviewees were asked for their perceptions on various aspects of casino-led regeneration, including how national policy was integrated into their planning documents, the regenerative effects of casinos and their impacts on the socio-economic and cultural aspects of the location. They were also asked about the type of casino image and the functions they thought would most benefit the resort culture of Torquay.

8.5   CASINO REGULATION AND REGIONAL POLICY INTEGRATION

The Planning and Compulsory Purchase Act 2004 (OPSI, 2004) was intended to update regional planning in Britain, making RPG10 the last regional plan in the old format. Casinos were addressed briefly in the south-west region's RSS.[31] Although the regional planning tier – in spatial and economic terms – is now defunct, it is used here to illustrate how casino regulation was dealt with as a device to promote regeneration. There are some observations to be made on how national casino regulation was integrated into regional spatial (unadopted), economic and tourism policies (SW Councils, 2010, SWRDA, 2005, 2006, Torbay Council, 2006b). The casino licensing jurisdiction bid by Torbay to host a casino coincided with the drafting of both the regional spatial and economic strategies in the same year. The area was identified as a growth point in regional planning documentation (Devon CC, 2004, DTLR, 2001, Torbay Council, 2006a), but a mismatch occurred between the aspirations of the two regional policies in terms of growth, economic and tourism development, and how casino development was intended to promote regeneration.

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[31] The planning system created by Planning and Compulsory Purchase Act 2004 (OPSI, 2004) was scrapped by the new Conservative, Lib-Dem Coalition government through the Localism Bill introduced to parliament on 13th December 2010 (DCLG, 2010b).

The place-making and regeneration representatives from the regional development agency seemed ambivalent about how significant the regenerative potential of casino development might be for Torbay (R1, R2). The fact that in national regulation as well as in the unadopted RSS, only regional and large casinos were addressed may account for this ambivalence, since small casinos may have been considered an ineffective driver of regeneration (R1, R2). The regeneration planner (R2) stated that it was 'a consolation prize' and 'hasn't caused any ripples in the RDA', and that 'we had some involvement, particularly with Torbay Council and the TDA on that, but not a great deal of involvement' (R2). It should also be noted that the expression 'small casino' referred to in gambling regulation was not fully understood by those interviewed, which may account for their not considering casino development as an important strategic policy item.

Though little attempt was made to fit Torbay's plans for casino development into mainstream economic and tourism strategies, when it was pointed out that a small casino – 40 gaming tables and 80 slots – had the potential to increase gaming provision in the town by over 500 per cent, the insignificance of a small casino suddenly became clear (SR1, R3). The county tourism manager stated that, 'I don't think they [regional planners] realised what they're talking about in terms of scale' (SR1). In effect, regional economic and tourism planners had not considered the scale effect a small casino would have in terms of cultural, economic and social impacts, and a full understanding of scale issues (table game numbers, slot machine entitlements and floor space requirements) was lacking among interviewees. The regional tourism development planner then made clear that a regional policy on casinos was needed urgently 'as [you] sort of instigated it' (R3). Casino development in the context of regeneration, and how gambling is viewed, was thought of as 'an agenda that will be raised again and again' (R3), with the 'generic' casino development criteria in the tourism section of the unadopted RSS needing to be made more spatially specific (i.e. investigating suitable towns or cities for casino development, (R1). However, recognising spatial specifics did not account for how these policymakers perceived the potential of casino development in terms of economic regeneration, or as a contribution to strategic ambitions for the regional economy.

This is consistent with the lack of any reference in the RES or the earlier regional tourism strategy to casino development although national casino regulation was imminent (SWRDA,

2005, 2006). The regional place-maker admitted that 'it's never really been covered in the RES' (R1), although these policy documents were prepared after publication of the Budd Report (2001), *'Safe Bet for Success'* (DCMS, 2002) and *'Casinos: Statement of National Policy'* (DCMS, 2004). Whilst Torbay's application to the CAP stated that there was a 'strong fit with local and regional policy frameworks' in terms of economic development (Torbay Council, 2006b, p5); regional development agency representatives and a county tourism representative saw casino development as just another visitor attraction. It was ignored in the RES, even though both the RSS and RES had identified Torbay as a growth point. The regional tourism development planner stated that 'we do get involved on a strategic level' (R3). This implied that regional tourism planning provided a framework within which local aspirations such as casino development could be linked strategically to regeneration, so there was scope for inclusion as in the case of Great Yarmouth.

Although most of the regional interviewees thought that a new casino would be complementary to developing new attractions in Torbay, the strategy was not perceived as compatible with the outdoor, rural and coastal tourism product that Devon sells (R1, R2, SR1), and a county tourism manager saw integrating casino regulation into sub-regional tourist policy as 'tricky' (SR1). Though the regional place-maker thought clarity in a strategic sense was necessary, a regional casino policy was discussed but never created (R1). Like the other two case studies, expressions such as 'parachuted in' (R1) or 'top-down approach' (R2) illustrated policymakers' frustration at having to deal with regulation that condoned an activity with social regulatory issues attached to it. It was also an activity they considered as only broadly complementary to tourism facility and economic development aims. This may also indicate a caution by policymakers on an activity likely to produce negative social impacts, which cannot be dealt with by economic policy. Rather, the tourism development planner admitted that 'we did tend to leave decisions on a local level at a local level' (R3), as an excuse for the lack of a regional strategic approach to casino development. Hence, it was left to local policymakers who made the bid to assess the socio-economic impacts of the development, and in the draft RSS, local planners were advised to adhere to general casino development criteria and to research casino expansion and its effects on Torbay (R1, SW Councils, 2010). Representatives from SWRDA appeared not to want to get involved in promoting a contentious cultural activity through economic policy.

To conclude, national casino regulation coincided with the drafting of both the RSS and RES in the same year. Although the RSS was required to address casino development on a basic spatial level, economic and tourism planners ignored local aspirations despite the fact that casino development fitted within policy frameworks. Torbay was identified as a growth point but some interviewees seemed ambivalent about the regenerative potential of a small casino, since this had not been researched at regional level. This stemmed from a lack of understanding about casino regulation, and little knowledge on casino size, scale and the potential economic benefits that could result.

Because casino development was included in the RSS, the time (August 2010) was now considered right for a casino policy to be included in the RES. But at sub-regional level, a casino attraction was considered uncomplimentary to the county's outdoor activities and its rural and coastal tourism product. In essence, a lack of understanding of casino regulation detail on scale issues, cautiousness about lack of wider social regulation of a contested activity and little idea of how a small casino could contribute to regeneration, compounded by a mismatch with the current sub-regional tourism offer, were the main reasons why casino development was not integrated into regional and sub-regional economic and tourism policies.

8.6   CASINO REGULATION AS A REGENERATION CATALYST

Like Scarborough and Great Yarmouth, regional planners were uncertain about how to decipher the relationship between licensing and planning laws and how to secure regeneration benefits.[32] The regional place-maker thought that 'the position has never been clear on a regional stage" (R1), indicating the complexity of casino regulation. Regional economic and tourism planners also had little idea of what the government meant by regeneration benefits, although they highlighted the general positive economic impacts a casino might have on the local economy, job opportunities and inward investment, and the trade-off with negative social impacts. At the same time, the initiative was seen as alien to the 'status quo' of regeneration based on partnership working (R3, SR1), since it was up to the private sector alone to deliver regeneration through casino development. There were also concerns about the lack of regional and county influence and management in terms of integrating this regeneration approach into strategic planning and tourism policy.

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[32] The Joint Parliamentary Committee in its first report in 2004 on the draft Gambling Bill stated that a mechanism to secure regeneration benefits and what these benefits may entail had not been made clear by government. Clarity was sought by the committee to be included in legislation (Parliament, 2004). However, casino regulation did not provide the clarity asked for (OPSI, 2006).

The place-maker (R1) and county tourism manager (SR1) thought that the top-down strategy of licensing construction of 'another visitor attraction' (SR1) was a negative approach by government, and the tourism development planner stated, 'I don't know of any places that have really greeted the opportunity for casino development enthusiastically as a driver for regeneration' (R3). Terminology such as 'another visitor attraction' signified the level of importance that the interviewee (SR1) attached to a new casino as a regenerator of Torbay. In contrast, the regional tourism development planner thought that an unconventional approach was innovative and 'probably a better way of looking at it' (R3), but the county tourism manager added a cautionary note, saying, 'You don't want to pin your regeneration hopes on one development that's so specific' (SR1).

The regeneration practitioner and both tourism sector interviewees thought that positive regenerative impacts depended on the quality of the development, scale of facilities and effect on the resort's image with its 'great Victorian roots' (R2, R3, SR1), but the regeneration practitioner and regional tourism planner believed it would have a significant physical impact on the tourism landscape (R2, R3). This implies the casino representation will produce new place and cultural reference points that may change the resorts identity. The county tourism manager also felt that a new casino development should fit with the county tourism policy focus on outdoor, sea, sand and heritage activities, but commented that 'there hasn't been anything specific to discuss on the impact of the casino and how that might impact the rest of Devon' (SR1) and in general thought that it would inject a confusing element to the current brand image of Torbay (SR1). This suggests that the wider implications of expanding a contested practice that some thought required greater social regulation resulted in those responsible for developing tourism spaces, reluctant to condone the practice.

At the same time, there was a feeling that if casino development was not well integrated into local regeneration policy there could be limited economic results (R2, R3), indicating that regional planners saw themselves as just a conduit for casino regulation. The regeneration practitioner believed that a large casino would deliver a greater tourism multiplier effect than a small one, through increased tourist numbers and spending, but insisted that development should fit with the target markets specified by tourism policy. Hence a small casino was seen as an insignificant regeneration vehicle, although the issue of scale was not fully understood (R2).

The last interviewee also warned that there was a danger of providing a low-quality casino experience that would fail to deliver the higher-spending visitor targeted by regional and local tourism strategies (R2). The county tourism manager, on the other hand, thought that the night-time economy could be invigorated by casino development, but again questions of quality and scale would be a factor in contributing to regeneration (SR1) and new job opportunities (R2, R3, SR1) – 'I'm not sure how many good-quality jobs there would be' in a new casino' (R3). However, economic impacts have not been researched, despite the DCMS recommending this be done at the regional level (DCMS, 2004).

The scale of inward investment was also a concern (R1, R2), with the place-maker saying that it would correlate to the regeneration impacts of casino development (R1). Others raised questions about the logic of attracting new investment for an industry in decline (R1, R2), given that policy calls for diversification of the local economy. The regeneration practitioner agreed that investment should be spent on economic diversification (R2), particularly in view of local authority reports that tourism jobs deliver less to the economy than those in manufacturing (Torbay Council, 2004). However, the place-maker thought that the success of Torbay's regeneration should be left to the mayor and his 'ambitious regeneration and economic development framework" (R1). He also envisaged that driving through casino development would be difficult, although 'there has been a good response [on this] driven by, as I say, the only elected mayor in the region' (R1).

In conclusion, at regional level, securing regeneration benefits through a mixed regulatory instrument that relies solely on the private sector to deliver those benefits was perceived as flawed. There was little understanding of the relationship between licensing and planning laws, and concern over the influence and control of a private sector-funded initiative that conflicted with usual partnership working arrangements. Grafting regeneration around a particular development rather than adding to a critical mass of projects was also thought unconventional. These factors together with the absence of research into the effects of casinos may explain the lack of planning commitment.

There was also a perception that achieving positive regenerative impacts would depend on the quality and scale of the development, concerns were expressed about how this type of

development would fit with the current tourism brand promoted by Devon and Torquay, which does not take account of activities requiring social regulation.

8.7   SUB-REGIONAL POLICY TENSIONS

While some regional policymakers thought a small casino could potentially deliver new jobs and create a tourism multiplier, sub-regional policy on casino regeneration is confused. Casino development was ignored in the Devon tourism action plan published in April 2008 (2008–2011), although the county council would have been aware of Torbay's initial casino bid, its successful application for small casino-licence jurisdiction, and RSS objectives to provide new high-profile attractions and guidance on casino development (SW Councils, 2010). County tourism planners also ignored guidance contained in the LDF briefing paper written by Devon County Council, which reiterated that casino development be included in the final LDF (Devon CC, 2006).[33]

But support was not forthcoming from tourism planners. An excerpt from the *'Tourism Devon County Council's Role and Action Programme'* in 2008 stated that to 'prevent any void in strategic planning policy, the current Devon structure plan policies (including those relating to tourism) are "saved" until the RSS is formally adopted, anticipated in 2008/9' (Devon CC, 2008a, p7). By saving regional guidance – such as providing major new attractions – the county council has avoided dealing with a contentious issue, in effect social regulating for casino development to be put on hold. The county tourism manager (SR1) was unsure of how to incorporate a contested activity into a tourism strategy. To her, the word 'casino' was incompatible with current visitor profiles and brand values, although a key theme in the programme was to 'Improve the quality and diversity of attractions and visitor accommodation' in the county (Devon CC, 2008a, p15).

The same manager also stated, 'I don't know whether it would be something we want to focus on', and that there were 'priorities on how we position ourselves', suggesting that a form of social regulation had already been exercised by county tourism policy (SR1). When asked if a new casino for Torbay was seen as an attractor, the planner replied categorically, 'No, I don't think so. No' (SR1).

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[33] The local development framework for Devon County has not yet been adopted (LPM1).

In summary, policy tensions existed between regional and county spatial planning policy and county tourism policy. Both the RSS and Devon's structural plan advocated the inclusion of casino development as a tourism development strategy, but this has not been reflected in the Devon tourism strategy. It seems that sub-regional planners have judged casino gambling as inconsistent with the traditional tourism profile and values, despite the fact that it accords with policy calls to diversify tourist facilities and activities.

8.8   REGIONAL VISIONS FOR A CASINO AND ITS LOCATION

National policy guidance on the representation and functions of casinos only extended to regional and large casinos. Small casinos were not described in the guidance, but all interviewees agreed that the new casino should produce and identity that complimented the grander elements of Torquay and be located in the primary tourist area (DCMS, 2004, R1, R2, R3, SR1). As previously discussed, regional spatial plans did not allocate locations for casinos, although 'an attempt was made in the RSS' that indicated Torquay would be best placed to host a small casino (R1).

On the identity of a casino space, interviewees had very little to say, but the place-maker (R1) and tourism development planner (R3) were in favour of an up-market entertainment and leisure representation, which suggests a Type 3: Casino Multiplex approach. The tourism development planner (R3) stated that a Type 2: Hotel Casino would increase competition for struggling quality-accommodation providers, but that a multiplex would go some way to fulfilling demand for new tourism activities.

Most interviewees also agreed with regional and sub-regional tourism strategies (Devon CC, 2008a, SW Councils, 2010) that any significant development should attract a new higher-spending visitor and elevate the resort's image (R1, R2, R3). Similarly, promoting a mass-market image was warned against by the tourism development planner (R3), and both she and the place-maker thought a new casino should be clearly differentiated from current night-time entertainment and leisure provision (R1, R3). 'We want to get away from that image of slot machines and amusement arcades on the promenade' that signifies a 'low quality' (R3), 'low-budget, low-grade' (R2) destination.

However, any detail about what kind of identity should be created was not offered, although the place-maker said that casinos can be 'quite unique buildings' and that it 'depends on what kind of statement you want to make' (R1). In general, complementing the grander late-Georgian, Victorian and Edwardian resort image through an iconic multiplex (R1, R2, R3, SR1) was considered the right direction (SR1).

These views echoed that of the county tourism manager (SR1) who thought that a casino would be better received if it had a different type of 'seaside feel' from the penny arcade, which could be created by the Bond-esque 'Monte Carlo type' (R1). All the interviewees felt that exploiting the grander built attributes of Torquay would be most advantageous (R1, R2, R3, SR1), attracting well-heeled residents and visitors and encouraging further regeneration (R3).

Interviewees had several preferences on the location of a new casino development in the primary tourist area (Map 3, p150). One suggestion was that the development be located near the highest footfall area near the historic harbour, but away from the arcades and night-time drinking facilities on the north and west sides of the harbour area (R3) Another suggestion was to locate it on or near the seafront promenade close to the historic Torquay Pavilion and Princess Theatre. The county tourism manager thought this was 'an obvious place' (SR1), and that 'there are existing buildings that would be better to make best use of rather than building something new' (SR1), mooting the idea that buildings such as the Torquay Pavilion could be restored. All interviewees thought a casino could also be placed nearer the quality hotels on hills on the east side of Torquay's primary tourist area, which ties in with local policy aspirations to see further development along and just beyond Victoria Parade (Torbay Council, 2007b). Another option would be to put the casino in the struggling council-owned Riviera Conference Centre, away from the town centre/seafront area of Torquay, to enhance the business tourism market (R1). However, noting past development controversy, the place-maker also thought that 'it was potentially challenging' in terms of the height of a casino building and its effects on coastal views (R1), and that the *'Mayors Vision'* would provide best guidance on this.

In conclusion, regional interviewees were clearly cautious about prescribing a specific casino identity, which they thought should be regulated at local level, but did have opinions on

issues of representation, identity and location. Most thought that the Type 3: Casino Multiplex would be best for Torquay, as long as it complemented the town's grander aspects of character and heritage and contrasted with the neon-lit arcades on the north and west sides of the harbour. Most interviewees also thought a Bond-esque identity would suit the multiplex format in area where tourist footfall was highest on or near the west side of the harbour where the grander built heritage of Torquay is apparent.

8.9   CULTURAL COMPATIBILITY: THE RESORT AND THE CASINO

In general, all regional interviewees were concerned with the cultural compatibility of the casino with current visitor markets and the resort character of Torquay. As discussed, the regional and sub-regional tourism strategies support two visitor types: those that enjoy rural and coastal environments, and urban resort visitors. The latter includes families, retirees and younger people, who visit during summer holidays, for weekend breaks, and stag and hen parties (SWRDA, 2005, Devon CC, 2006, Torbay Council, 2010j). The county tourism manager felt that Devon was 'more about the natural landscape and things we've got to offer on the coast and countryside', and saw a casino as culturally incompatible with current tourist facilities, stating, 'I think there would be lots of questions if it was about a casino' (SR1). This may be valid in terms of Torquay's family, retiree and rural visitor markets – 'We know enough about them, and that they are interested in outdoor activities' (SR1). The regional place-maker supported this view, maintaining that 'Torbay is regarded as a relatively elderly resort, with great traditional Victorian roots. This [casino development] would be a very significant departure from that' (R1). The two interviewees also indicated that Victorian ethics combined with the bay's health and wellbeing heritage was perceived as synonymous by most of the older visitor market. However, the town also attracts a young weekend and summer-party set that supports the night-time economy, with binge drinking concentrated on the north and west side of the harbour (Torbay Council, 2010j).

The tourism development planner was more interested in the compatibility of the casino with Torquay's traditional family resort culture, and in differentiating it from the mass-market image of arcades and slot machines (R3). She also thought a new casino should create a culture of 'the rich' visiting the town, to complement Torquay's grand pre-war heritage (Walton, 1983, R3), but cautioned that this might be a significant departure from current tourist markets (nature lovers, families and retirees) and 'conflict with the family trade' (R3).

All regional-level interviewees noted that conflicts with current visitor profiles could be offset by a relatively modest Bond-esque casino identity (R1, R2, R3), though this ignored the town's recent history of mass-market arcades, cheap watering holes and nightclubs. The alternative would be to fit the casino in with the 'promenade and pier' culture', which was not how the planners envisaged a casino contributing to the regeneration of Torquay.

In summary, all interviewees were concerned about the cultural compatibility of the casino with current visitor markets and the resort character of Torquay. Families, retirees and those visiting for heritage and outdoor-activity holidays were not seen as compatible with a neon, Las Vegas-type casino, but rather an up-market, Bond-esque multiplex could fir in if it reflected Torquay's heritage and character. However, by prescribing an up-market facility associated with the rich, the majority of interviewees were, in effect, already pre-regulating the social profile of the casino rather than attempting to diversify the visitor market.

8.10   LIMITATIONS OF REGIONAL AND LOCAL CASINO POLICY RELATIONSHIPS

Torbay's aspirations to host a casino have been well known to regional and sub-regional planners since the government issued its national casino policy guidance in 2004 (DCMS, 2004). Regional planners working on economic and tourism strategies under the new planning system introduced by Labour would also have been aware of the local authority's casino intentions (R1). A casino was not a new idea and was addressed in the RSS in 2006, but was not linked to economic development or tourism (SW Councils, 2010, Torbay Council, 2006b) due to either underestimating the economic advantages or regulating because of social impact concerns. The place-maker stated, 'I was aware a couple of years ago that this was discussed in the context of the regional spatial strategy' (R1). However, the county tourism manager saw casino development as a purely local matter that conflicted with the aims of the sub-regional tourism plan (SR1), consequently the potential for inward investment, job creation and multiplier impacts, as well as for any social impacts, was never researched at regional level as it was felt this should be done locally. The issue of cultural compatibility was also not researched.

The regional place-maker claimed that at regional level casino development had not been seen as an economic opportunity (R1) and, according to a tourism planner, had not been

investigated at regional planning level (R3). Therefore there was no understanding of scale and capacity issues and small casinos were thought to be insignificant (R1, R3), while the regeneration planner saw other priorities, such as economic diversification, as more important (R2), despite the reliance of the town on tourism. Both tourism sector representatives saw the current market profile as security for the destination and did not support local aspirations for casino development, since the casino gambling activity clashed by the Devon and Torbay brands.

Failure among regional planners to guide or support the local authority on casino development has led to little support for the strategy, particularly in view of the potential for conflict with current markets and the Devon and Torbay brands. To further explore these and other issues, the next section will examine local perspectives on casino development.

8.11   LOCAL PERSPECTIVES ON CASINO DEVELOPMENT

As with Scarborough and Great Yarmouth, Torbay Council also had to adopt a new gambling licensing policy (Torbay Council, 2010f) and, as with Great Yarmouth, regeneration benefits aspired to by the council were outlined in abstract form (GYBC, 2009b, Torbay Council, 2010f). As at the end of August 2010, the process to award casino premises licences had not begun. Interviewees from Torbay failed to shed light on the pace of the competition process, but provided comments on casino regeneration and regulation, tensions within the casino development process and the compatibility of casino development with Torquay as a resort. The perceptions of people directly or indirectly involved in the on-going process are reported here. Interviewees ranged from TDA policymakers (LPM1, LPM3), a council policymaker (LPM2), local politicians (CON1, LD1), community partnership and voluntary services representatives (COM1, COM2, COM3, COM5), a civic society representative (COM4) and local business people representing the tourism, retail and skills training sectors (BIZ1, BIZ2, BIZ3).

8.12   CASINO REGULATION AND LOCAL POLICY INTEGRATION

As with Scarborough and Great Yarmouth, the regulation process to formulate a new local gambling policy has been completed, with casino development aspirations integrated into local corporate, economic regeneration, licensing and tourism policies (LPM1, TDA, 2007, 2010) as a complement to the *'Mayors Vision'* (Torbay Council, 2007b). However, as

elsewhere, because the choice of development site has been left to developers to determine, spatial allocation has not been incorporated into local gambling policy and therefore cannot be planned for (LPM1).

The local plan adopted in 2004 was too old to have incorporated spatial arrangements for a casino site, although they could have been accommodated in the core strategy of the draft of the LDF (Torbay Council, 2010i). However, AAPs within that framework had not been be finalised at the time of this research. TDA policymakers stated that there had been a lack of urgency in the competition process, which had impacted on finalising spatial plans (LPM1, LPM3), since a site chosen by a developer may have been allocated to other uses if AAPs had been finalised. According to the council policymaker, as casino premises licence bidders can choose their own sites, with pre-determined sites, leaving the council open to legal challenges (LPM2). This is an untried process in terms of spatial planning and Torbay Council has trodden very carefully to avoid litigation, which had been 'a bit frustrating' (LPM3) in terms of implementing the new statutory planning process. In short the intersection of the new planning system with casino regulation combined with fear of legal challenge had delayed the competition process (LPM3). A community representative stated that the whole process was 'cloaked with mystery' (COM5). Although general criteria for regeneration benefits required from operators were set out in the competition regulation, details such as sites, scheme types and favoured regeneration benefits were subjects policymakers were hesitant to talk about (LPM1, LPM2) with one council policymaker saying,'[We] shouldn't go into the policy on the grounds of potential legal challenge' (LPM2).

As with Scarborough and Great Yarmouth, the economic and community benefits can only be assessed once competition participants qualify for the second round of bidding, since it is only then that their conceptions for the representation, identity and site for a new casino, including benefits can be judged in terms of regeneration. According to a development agency policymaker, 'The first thing we've got to do is identify the operator, forward the licence and then we can look to see what impact the casino building can have on regeneration' (LPM3). This highlights further awkwardness in the casino regulation process and its intersection with new statutory planning.

These difficulties have occurred because planning by the DCMS and the CLG have created procedural conflicts, generated by local councils having to implement the new spatial planning processes and casino regulation simultaneously (Parliament, 2004a). In a government report this conflict between separate premises licensing and planning permission processes was again recognised (Parliament, 2004b), resulting in a recommendation that the ODPM (now the CLG) and the DCMS should work together to resolve such conflicts (Parliament, 2004b).

However, this resolution has not been achieved. A TDA policymaker stated that there was still 'concern that between the licensing and the planning systems there's some ambiguity' (LPM1). For example, if the LDF had been adopted before the bidding process was complete, it would have needed amending to take account of the winning operator's scheme and choice of site and the regeneration benefits offered. Furthermore, any AAPs in which a casino site was located would also be affected. This is costly. In addition, if the winning developer decided to 'sit' on the licence and wait several years (perhaps due to concerns about a recessionary economy), any regeneration benefits associated with the development would be put on hold (LPM1). There is also the chance that once a premises licence is issued the scheme will still need to go through the local planning-permission process. This process is separate from casino regulation and cannot be taken into account during the competition process. This may cause further delays in a new casino opening its doors.

The complexity of casino regulation and integrating it into statutory planning processes at local level has been interpreted in different ways. A development agency policymaker stated that 'casino licensing is entirely separate from physical regeneration or the identification of a site' (LPM3). This is incorrect, but illustrates the kind of misunderstanding that can occur. On a positive note, a council policymaker thought the process could leverage greater benefits if a Section 106 Agreement was used to 'top up' those cited by a premises licence agreement (LPM1). Business and community representatives thought the prospect of the vociferous 'no change lobby' wanting to socially regulate a winning scheme at the planning permission stage (COM1), which might affect the viability of the scheme (BIZ2), could provide the operator with another reason to 'sit' on a licence. A further problem with national regulation – as described by a TDA policymaker – is when there is only one bidder (LPM1) and a 'low-quality product', alongside little in the way of community dividend is offered (LPM1).

The integration processes confused a voluntary services sector representative. She thought that this wholly privately led regeneration strategy could distort council's social regeneration agenda and the community benefits of casino regeneration (COM3). This was backed up by the development agency policymaker, who stated that there was 'some wriggle room for operators and developers not to have to pay what we think is going to be a fair share' (LPM1). Some though that casino regulation would not create diversity in the local economy, nor guarantee benefits in terms of housing, education or other social forms of regeneration (COM3, LD1, LPM2). A similar observation on securing benefits was made by a joint parliamentary committee when scrutinising national regulation (SOL, 2004a).

To summarise, casino development as an aspiration has been successfully incorporated into local corporate, economic, licensing and tourism policies, led by the *'Mayors Vision'*, but implementing casino regulation in terms of spatial planning has been more problematic. Casino regulation – a mixed legal and social regulatory instrument – its procedures and more importantly timing have caused tensions in implementing local planning procedures. This discord has frustrated policymakers, as has the potential for legal challenges by the casino industry, which could tie the hands of spatial and regeneration planners in exploring suitable sites for inclusion in the LDF. There was also fear of litigation over the competition process itself. Furthermore, ambiguity at national level on how regeneration benefits should be secured has led to a similar uncertainty at local level. Finally, there were concerns that the local 'no change lobby' might reject a winning bid at planning stage, or that a low-quality or single-bid submission could distort council policy aspirations and community benefits expected from casino regeneration.

8.13   CASINO REGULATION AND TOURISM

According to the opposition politician and two TDA policymakers, awarding a casino licence was not top of the regeneration agenda (LD1, LPM1, LPM3), though a casino had the potential to enable Torbay to become 'a progressive destination' and this linked well with economic development, tourism facility and image aspirations (LPM1), but the view that casino development alone could make Torbay a progressive destination was not shared by many interviewees.

After the council's bid to become either a large or small casino-licensing jurisdiction (Torbay Council, 2006b) it was granted a small licensing jurisdiction (OPSI, 2008a). TDA policymakers seemed disappointed, thinking that a small casino would have less impact than a large one (LPM1, LPM3). However, relying on a casino for regenerating the town was considered a risky strategy by a community and TDA representatives (COM1, LPM1, LPM3), with another community member answering, 'It won't' complement other tourism regeneration strategies (COM4). This was an isolated local opinion, although it concurs with those held at regional level.

Many interviewees felt that casino development needed to be part of a wider regeneration agenda (BIZ2, COM1, COM2, COM3, LPM1, LPM3) as set out in the *'Mayors Vision'*, seeing it as being able to enhance the image of the resort and create a 'stylish and glamorous built environment' (BIZ2, COM1, CON1, LPM1, LPM3, Torbay Council, 2007b, p27). A business representative even advocated an 'anything goes' approach, stating that every aspect of regeneration had to be embraced. She suggested that with 'tourism as a major strand of the economy, a casino [could] do an enormous amount' for regeneration (BIZ2). Business, community and policymaking representatives also thought it could provide another pull factor that would update and broaden the tourism offer, as well as increase local leisure provision. Overall, it was clear that interviewees saw the success of the tourism sector as inextricably linked with that of the town, and that a new casino would make a significant contribution to regenerating the town's economy and to levelling seasonal demand (BIZ1, BIZ2, COM2, COM3, CON1, LPM1, LPM2, LPM3).

Casino development was also perceived as having the potential to provide better quality jobs, and increase the multiplier effect (BIZ2, CON1, LPM1, LPM3), but most agreed that it needed to be high quality to provide the right catalyst (BIZ2, COM4, LPM2). Again, the *'Mayors Vision'* was seen as linking these elements with an effective strategy for attracting inward investment (Torbay Council, 2007b) and creating confidence in tourism generally (BIZ1, BIZ2, COM3, COM5, LPM1, LPM3), but would depend on a high-quality representation and identity (COM2, COM4, CON1).

Among community representatives there were concerns about over-capacity of gambling provision – 'People just don't gamble [in this town]' (COM1) – which would have little

appeal to the current visitor profile or local population (COM1, COM4, COM5). The opposition politician thought that a casino would detract from the natural asset-based tourist market and that local demand was not big enough to support two casino operations (LD1). Over-capacity might result in a 'White Elephant' (COM5) or the old casino closing (LPM1), though the council cabinet member felt there would be a demand for a new quality casino as 'there isn't one in Devon county, which has a population in excess of 600 000' (CON1). A community representative hoped that a casino would attract a higher-spending visitor to Torbay (COM4), while a business representative thought it might appeal to the business-travel market (BIZ1).

Another concern voiced by many was over transport links, which affect economic development and tourism access, as well as traffic congestion in Torquay (LPM1, Devon CC, 2008b, 2011, Torbay Council, 2005, 2011). Many felt these problems were hindering regeneration (BIZ1, BIZ2, COM2, COM3, COM4, CON1, LD1, LPM1, LPM3) and could influence visitor numbers to the new casino (LPM1).

To conclude, casino development was not top of the regeneration agenda as it was seen as part of the wider regeneration of the tourism sector. However, it was felt that a casino could provide an additional and progressive attractor that would link well with other tourism and economic development plans, and provide better quality jobs related to tourism, which in turn would increase the multiplier effect. There was also a perception among many that only a quality casino would provide the catalyst to rejuvenate other tourism facilities and deliver community benefits, but others were disappointed that Torbay had only been granted a small casino. Additional concerns focused on problems associated with expanding an under-subscribed activity as well as road access to the resort, though it was recognised that a new casino would attract a new, higher-spending leisure and business market.

8.14   SOCIAL AND MORAL TENSIONS IN CASINO DEVELOPMENT

In general, policymakers and business representatives did not consider casino development morally or socially unacceptable, and very few interviewees thought casinos should be subject to moral regulation, but community representatives wished to see a greater degree of social regulation to avoid social problems in Torbay. It was evident that memories of a casino shooting and the deaths of four local people in 1973 (*Herald Express*, 2010) had left a mark

on some interviewees (BIZ1, COM2, COM5) and that, 'like Chicago or Las Vegas' (COM2), they associated casinos with other types of crimes such as drugs and prostitution. A community representative believed that there was a danger of creating a meeting point for local 'lowlife' and for anti-social and criminal behaviour (COM5). There was also widespread belief that the gap between rich and poor would be highlighted, and that problems of social exclusion and problem gambling would increase (COM1, COM5), but a community representative remarked that a public campaign addressing problem gambling could reduce social risk (COM1).

Though all policymakers agreed that social problems could increase (LPM1, LPM2, LPM3), the RSS recommendation that local authorities research the impacts of casino expansion had never been carried out. The council policymaker advocated more council-led social regulation so that 'some of the benefits from the casino [could be] used to tackle problems associated with gambling on a broader scale' (LPM2), though both he and a TDA policymaker recognised that a casino would just extend the present pub and arcade slots culture (LPM2, LPM3). In terms of the casino specifically, 'it becomes an easier pill to swallow' if regeneration benefits derive from a gambling operation that 'is almost a marginal part of that development' (LPM1). These comments suggest that a multiplex could offer more resources for social intervention.

Though most interviewees had no objection to casinos on moral grounds, two business representatives stated that there had been a 'no casino' campaign (BIZ1, BIZ3) and that a civic society representative (COM4) had been involved to guard against any perceived social impacts that might arise from a quick-gain culture. A local opposition politician stated that it was 'a reflection of the sad culture that we have in the UK – it's all about winning rather than actually trying to carve out a better quality of life' (LD1). Others thought the general public was not interested in regulating on moral grounds, although the 'no casino' campaign had spread into the public realm and been debated in the local newspaper (COM1, COM4, LPM3).

Social regulation addressed by Torbay Council in licensing policy has gone further than national regulation requires, with casino licence bidders asked to consider social responsibility not just on their premises but in 'Torbay as a whole' (LPM2, Torbay Council, 2010f). A TDA policymaker believed stronger social regulation in bid documents would give

the council greater control over social impacts and could be facilitated through partnership working with the licensed operator (LPM1). However, the local opposition politician pointed out that the council did not have the means to significantly regulate the negative social impacts of casino expansion, since, according to a recent Audit Commission (2007) assessment, Torbay council 'has a red flag for not serving those most in need in our community' (LD1). This raises questions about the council's duty of care to residents along with the availability of resources to implement a stronger regulatory function (LD1).

To conclude, nearly all interviewees thought casino gambling was morally and socially acceptable, but most policymakers and community representatives wanted to see stronger social regulation than had been prescribed by legislation. Other policymakers agreed that social problems could increase, but that this was a price worth paying in order to accrue the benefits of a casino. However, benefit accrual and the social costs of expanding casino gambling have not been properly researched at local level and the local authority may not have the means to address such issues.

8.15   CASINO CONSULTATIONS

This section discusses interviewee reactions to both internal and external consultation processes, which has been conducted by both the council and other organisations. These responses cover a timeline that started with Torbay's casino bid to the CAP in March 2006 (Torbay Council, 2006b), and continue with more recent consultations on local gambling policy held in September 2009 (Torbay Council, 2009d).

The first public consultation was conducted online in 2006. Of 184 respondents, 52 per cent 'definitely' supported a new casino, with 20 per cent 'probably' supporting the idea (Torbay Council, 2006c). However, this number represents only a small minority of the population, indicating that the public were not interested in socially or morally regulating a new casino and that the 'no casino' lobby made up of older residents had been restricted due to the consultation medium (BIZ1). The consultation was site-specific, suggesting two historic landmarks - the Torquay Pavilion and Oldway Mansion near Paignton (Torbay Council, 2006b) - to be assigned new gambling based identities.

Between 2007 and 2009, separate internal consultations were held by the local Liberal Democrat party and Civic Society, which returned the opposite result to the council's consultation (COM4, LD1). A representative from the Civic Society who was a vociferous 'no casino' lobbyist stated that 'the trouble is they're [the council] not carrying the whole population with them because, frankly, the whole population don't even think it's a subject worth considering so they're not willing to comment on it' (COM4). He and a TDA policymaker admitted that the town's small businesses supported casino development (COM4, LPM1) to accrue economic benefits, but COM4 defended his position on the grounds that the council had not fully engaged with residents. Other interviewees also thought public attitudes to casino development were mixed.

The cabinet member and all the policymakers supported casino development, in line with council policy, which was to be expected. The 'no casino' lobby was not thought to be very strong (BIZ2), but a tourism colleague thought there were 'mixed feelings' and that the mayor should 'stand up and say, 'Right this is going to happen'' (BIZ1). A cabinet member, however, was adamant that public opinion endorsed the *'Mayors Vision'* and that the mayor would make the final executive decision (CON1).

A second consultation was held three years later in September 2009, but this time it was not site-specific. Interviewees representing local business, potential developers and other economic interest parties focused on the local economy (COM3) and the community benefit criteria outlined in the draft local gambling policy (Torbay Council, 2009d). The exercise produced mixed reactions, with a business representative seeing it as useful (BIZ2), while the 'no casino' campaigner thought the council was just ticking boxes to cover its back (COM4). Another community representative responsible for coordinating all the voluntary social and community services in the town – 'there are 300 in the bay' – was not invited, although her opinions on the social impacts of casino expansion could have been helpful (COM3).

The detachment of the public from the consultation drew criticism. But the casino regulation is new and policymakers may have been concerned that it would provoke litigation; consequently the consultation lacked detail. As discussed earlier in regional interviews, the licensing process was awkwardly entwined with other policy and planning areas (for example, area action plans) and, because a site was not discussed, consultees were unable to quantify

community benefits. This created ambiguity on the direction of development and how to link casino development to regeneration outcomes. But a positive online consultation in 2006 seems to have provided a building block for the mayor to take the scheme forward.

To conclude, in 2006 the council put in its bid as a licensing jurisdiction and held an online site-specific public consultation on casino development that assigned new cultural identities to historic buildings in the bay. There were very few responses to the consultation, suggesting that the public was uninterested in socially or morally regulating casino development, or that the online medium had restricted participation. This positive result, combined with the fact that local businesses supported the strategy, spurred the mayor to take the decision to proceed with Torbay's casino regeneration strategy and integrate it into other policy areas. However, separate consultations by a political party and a community organisation, which wanted to regulate casino development reflected the 'no casino' campaign. A second consultation focusing on economic and community benefits lacked detail because of litigation fears, and the exclusion of parties may have been orchestrated to prevent stronger social and moral regulation being demanded.

8.16 LOCAL VISIONS FOR A CASINO AND ITS LOCATION

In this section interviewees comment on how they envisaged a new casino and its location. This is informed by the local authority's view that a new casino should project a positive image among locals and visitors and act as a catalyst for economic, social and cultural regeneration for Torbay (Torbay Council, 2006b).

The way in which a casino would be conceived by developers was of major concern to many interviewees. The least favoured identity was the neon-lit, Las Vegas-type operation, which most considered unsuitable for Torquay (BIZ1, BIZ2, COM2, COM3, COM4, LPM1, LPM3, LD1). The tourism business representative recommended a 'Monte Carlo' style casino (BIZ1), but a local opposition politician thought a 'south-of-France, James-Bond sort of casino' would be preferred by most people in the town (LD1). This view was supported by a community representative who envisaged an up-market 'Monaco scenario…really classy set-up' as best for the destination as whole. Two other community members saw updating 'old world charm' and revitalising the historic built heritage of the resort as the best direction to take (COM4, COM5), which they felt would provide a new tourism attractor and naturally

exclude the vulnerable (COM3). Another thought a casino development should provide a social occasion to encourage people to visit (COM2). A council policymaker agreed, stating that 'the intentions behind the legislation is that it will broaden the leisure opportunities for Torbay and lead to more people staying, which will lead to greater regeneration' (LPM2).

However, a business representative and a community worker warned that current facilities would also need improving – such as the retail facilities – to complement the Bond-esque identity (BIZ2, COM5). Policymakers also thought that the council would need to moderate a privately conceived identity to ensure it was 'what we aspire to be' and would promote further investment (LPM1). This could be achieved through the competition and planning processes (LPM1, LPM3). A local opposition politician, however, stated that the market would probably dictate casino identity and that 'it's more about slot machines, because I think that's where they make their money' (LD1).

As well as agreeing on the Bond-esque identity, most interviewees were in favour of a Type 3: Casino Multiplex representation (BIZ1, BIZ2, BIZ3, COM1, COM2, COM5, CON1, LPM1, LPM2, LPM3, LD1). Business interviewees wanted to see a mix of other facilities. Ideas for this included an ice rink, bars, restaurants, nightclub, retail facilities, cinema, adult entertainment shows and even youth and family entertainment, as well as night-time, adult-oriented, all-weather activities that would appeal to both visitors and locals (BIZ1, BIZ2, BIZ3). Two community workers saw the multiplex form as a space offering youth and family entertainment that would appeal to locals as well as to the traditional sea and sand holiday market (COM1, COM5), but TDA representatives wanted an attraction that would act as a focal point for further regeneration (LPM1, LPM3).[34] What was not considered by some interviewees was how gambling, adult, youth and family activities could coexist without causing conflicts, but a community representative thought this might be solved by a Type 1: Standalone Casino based in a restored grand building, such as the Torquay Pavilion, (COM3) since this was best suited to a Bond-esque casino.

Other location ideas were also offered. According to one policymaker, 'Torquay is the most likely' location for a new casino since Torquay is the 'City Centre' for Torbay (LPM1). Other

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[34] Observation: Although Council officers and local politicians were made aware that these interviews were strictly confidential they were unwilling to give much detail on casino functions and potential locations. Most remained cautious in their responses to certain questions that may be construed in the future as affecting the bidding process and which may lead to legal challenge by the casino industry.

policymakers were hesitant to prescribe sites, but were happy to discuss general areas included in the *'Mayors Vision'* or specific sites included in the LABV scheme. Like the regional interviewees, there was a consensus that an area with the highest footfall, especially at night, would be best, which was generally considered to be in and around the Torquay waterfront and harbour (LPM1, LPM3, LD1). Policy states that the 'harbour area [should be] at the forefront of delivering the objectives of the Torbay Community Plan 2007+ (that includes casino development) and bringing forward "The New English Riviera" concept, as well as complying with RPG10 that the general harbour area has been defined as part of the town centre' (Torbay Council, 2007a, 2007b, 2010j, p5). Furthermore, a casino on the waterfront would add to the night-time entertainment facilities already in the area (LPM1). Another policymaker (LPM3) suggested regenerating the run-down but grand Palm Court or The Riviera Centre, which have both been offered as part of the LABV regeneration joint venture proposals (Torbay Council, 2010g).

Nearly all of the community workers and business representatives agreed that a waterfront location in Torquay would be best for regeneration. (BIZ1, BIZ2, COM1, COM2, COM3, COM4). Some also suggested regenerating heritage sites, particularly the run-down Torquay Pavilion overlooking Torquay harbour and Princess Gardens, since its central location, high footfall and grand image would complement a Bond-esque identity (BIZ1, COM1, COM2, COM3, COM4). Putting a casino in an iconic landmark site like the Torquay Pavilion would also provide a strong symbol of regeneration (COM3) and pull people down to the seafront facilities (BIZ1, BIZ2). In addition, developing this site would complement one of the aims of the *'Torquay Harbour Area Action Plan'*, to protect the built heritage of Torquay's harbour side, which is regarded as the historic nucleus of the town (Torbay Council, 2010j).

However, social regulation could thwart the choice of a waterfront site. A council SWOT analysis of the harbour side area in 2010 reported that bars and nightclubs aimed at the young and hen and stag parties have resulted in heavy drinking and anti-social behaviour. The council responded to this through a special licensing policy, and has been refusing new alcohol licenses in many parts of the town centre and waterfront areas (Torbay Council, 2010j). Although a Bond-esque identity might exclude the blue-collar and weekend reveller heavy-drinking market from the area, it could also become a magnet for other anti-social elements.

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In summary, the way in which a casino is conceived by developers was of major concern to many interviewees. The Bond-esque identity was thought to be most compatible with the resort's history and character, as well as its aspirations, and would help regulate entry by excluding vulnerable groups. It was also thought that the licensing competition and planning mechanism could moderate any unsuitable proposal. Overall, it was thought that a Type 3: Casino Mulitplex would suit the resort best, by providing a wide range of activities and acting as a focal point for further regeneration. The idea of offering gambling alongside adult, family and youth activities were not considered to be problematic.

In terms of location, there was a consensus that the best site for a multiplex would be where night-time footfall was greatest, and therefore in or near the seafront or harbour areas. A waterfront site would provide an attraction at the end of the main thoroughfare in the primary tourist area and pull people down from the town centre. Some suggested regenerating heritage sites, particularly the Torquay Pavilion, as a symbol of regeneration and to protect the heritage of the town. However, regulation of night-time drinking could also thwart the choice of a harbour side location.

8.17   CULTURAL COMPATIBILITY: THE RESORT AND THE CASINO

This section looks at interviewee perceptions of the resort's culture and how it may be affected by casino expansion, as well as the deeper cultural meanings embedded in local interviewees' attitudes. As described earlier, three different urban cultures exist in the bay. Torquay is a more sophisticated town than Paignton, which is primarily a traditional family-oriented sun, sea and sand destination offering pier and high-street amusement arcades at 'the lower end of the market' (COM2). By contrast, Brixham is a working fishing village with maritime tourist attractions (COM2, COM5, LPM1, Torbay Council, 2007b). Torquay was perceived by both regional and local interviewees as the most suitable area in which to site a new casino. This view was backed up by a business representative who thought that Torbay was compartmentalised and that a casino would only fit with the cultural profile of Torquay and its up-market facilities (BIZ2). The cultural compatibility of the preferred Bond-esque multiplex casino will therefore be explored in the context of Torquay.

In terms of its accommodation and award-winning restaurants (ERTB, 2010), Torquay appears to offer the most up-market facilities in keeping with a Bond-esque identity, and

most interviewees thought this would complement the town's cultural history and built heritage, particularly if located in one of the grander sites (BIZ1, BIZ2, BIZ3, COM1, COM2, COM3, COM4, LPM1, LPM3, LD1). A business representative perceived casinos as having 'a double image', as either glamorous or 'tawdry and cheap' (BIZ1). To avoid any association with arcade culture on the north and west sides of Torquay harbour, a up-market identity would therefore be most suitable.

Two community representatives thought that trying to promote tourism and retirement in the same place was problematic for the destination as whole. Many retirees, as regular participants of the 'no change' lobby, were opposed to development (BIZ1) since this was not the dream they bought into when they moved to Torquay (COM2, COM4). Torquay attracts approximately 70 per cent of all nursing, residential and retirement-home occupants in the bay (Yell.Com, 2010). Their disposable incomes may be a lucrative target for casino operators if they can create a casino identity that is perceived by this group as compatible with the resort's history and character.

Although some interviewees saw Torquay as up-market, a community representative reported that 'I've had people say things like, 'All the poorer people come to Torbay and all the rich ones go to Southampton' (BIZ3). This suggests that Torquay may find it difficult to develop a cosmopolitan casino identity, since 'there is no money' and 'people are on the breadline' and would create a stark cultural contrast between those who could afford up-market cultural products and those who couldn't, and create a culture of exclusivity around the casino (COM5). But another community interviewee (COM1) felt this an up-market identity was a positive way of regulating gambling so not to put vulnerable groups at risk, because if 'misery [was] caused by this' the community at large would not accept a casino as part of the resort's culture (COM2).

To sum up, Torbay has three distinct urban areas, each with its own particular place and cultural attributes. Torquay's urban character, history and up-market hotels and restaurants were thought to offer the best environment in which to develop a new casino and attract a higher-spending visitor. A Bond-esque multiplex casino would complement the town's cultural history and grand built heritage, but would need to be located in a place that differentiated casino gambling from the town's arcade and adult entertainments. It was also

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thought that a Bond-esque multiplex might appeal to older visitors and residents by creating a culture of exclusivity thereby attracting affluent visitors and discouraging vulnerable groups.

8.18 CONCLUSION

It is evident that the regeneration of tourism in Torbay has delivered some successes, which given the importance of tourism for the local economy is a positive move forward. Furthermore, a vision for the bay is being implemented through policies such as the *'Mayors Vision'*, the LABV joint venture and local casino regulation. However, planning for development and growth has been problematic. The RSS and LDF were never adopted, and are now defunct. The change of government, a new planning policy and spending cuts have counteracted previous regeneration plans made under more positive economic conditions.

Casino development is proceeding, and was perceived by most interviewees as bringing a new stimulus to the resort and its visitor demographic and providing new leisure facilities for locals. Very few interviewees had moral concerns about casino expansion, but, as with Scarborough and Great Yarmouth, there were warnings about social impacts. Some thought stronger social regulation was needed to address a potential increase in gambling addiction, as well as other problems such as anti-social behaviour. Though regulation requires developers to address the social impacts of casino gambling on a wider geographic scale than just the casino site, this did not go far enough for some community and regional representatives. However, most local interviewees saw casino expansion as socially acceptable, but thought it should be marketed to an audience that could afford it.

There was also a belief that a casino would add a progressive dimension to the tourism facilities and raise the image of the resort, as well as complement its existing four- and five-star hotels, yacht berths and award-winning restaurants. Many perceived casino development as an economic driver, but balancing the bay's natural assets and family-oriented entertainments with a new and contested visitor attraction was seen as potentially problematic. How this new attraction would fit into the current resort culture and built environment was of major concern to most interviewees, as was the scale of gambling provision proposed. Some saw the extra capacity as superfluous and leading to facilities being underused.

Issues of scale were also relevant to casino identity and its footprint. National and regional regulation envisages a multiplex for regional and large casinos, but small casinos are not regulated in the same way and site choice is up to license bidders. Like Great Yarmouth, local documents are unspecific on the question of scale, but provide a framework. Because the council bid proposed both a large and small casino, most interviewees favoured a Type 3: Casino Multiplex to exploit the greater economic benefits this model could offer.

Some interviewees thought in addition to a casino, a multiplex should include night-time entertainment, restaurants and retail facilities, while others felt a wider range of facilities aimed at a broader market should be included. It was also thought that a multiplex would provide more jobs and extend night-time activities, thereby attracting a higher-spending visitor and act as a catalyst for further inward investment. This was seen as supporting the regeneration work already completed in the town, although some interviewees felt a new casino should appeal to the markets that already visit and reside in the bay.

What was not evident from national and local casino regulation was the way casino identities should be produced, which has been left to the casino industry. From the interviewees' point of view, the Bond-esque identity would most suit Torquay's late-Georgian, Victorian and Edwardian character and history and contribute to the up-market attractions the town already offers. Some interviewees felt this could be a way to redeem some of the town's run-down sites, and suggested a number of grand locations. Most interviewees also thought buildings or sites located on the east side of the harbour or on the seafront promenade would be the most appropriate place to site an up-market tourist development, though assigning an existing building an identity based on a contested cultural practice might prove problematic. However, whatever was proposed by developers it was clear that the 'no change' lobby would try to moderate the development to protect Torquay's current resort image.

To summarise, Table 14 (p179) illustrates how national policy has been understood and interpreted at regional and local levels, and what interviewees perceive as the most suitable identity and location for a casino in Torbay.

Table 14: Torbay casino policy and development perceptions.

Resort	Theme	Regional Perspective	Local Perspective
Torbay	National Casino Policy Perceptions	Regeneration benefits only come from quality development to re-image resort. Graft of top down strategy to spatial and economic plans. Lack of understanding on size, scale and economic benefits of a small casino. National policy lacks clarity on how to secure benefits from private sector. Lack of understanding of interrelationship between licensing and planning laws. Public sector has little influence or involvement with development (no partnership). Acceptance that casino should have been included in tourism strategy, although questions about fit with current strategy. Casino development should be researched at local level.	Casino is part of the wider regeneration agenda for the tourism sector as broadens offer and shows resort progression. Casino will provide good quality tourism jobs. Catalyst for further tourism investment. Potential for over capacity of casino space. Fear of litigation over site allocation in spatial plans and in competition process. Ambiguity on how to secure regeneration benefits. Concerns that the local 'no change lobby' may socially regulate a winning competition bid. Frustrated by policymakers that a casino site has not been able to be planned for. Low quality or single bid could distort policy aspirations and benefits expected. Promote tourism and leisure provision for locals. Complexity of casino regulations not understood by some.
	National Casino Policy Integration	Included in RSS. Included in county spatial plans. Not Included in RES or regional tourism policy due to cautiousness. Not included in sub-regional tourism strategy as not complimentary to outdoor activity, rural and coastal tourism.	Mayor's Vision propagates successful integration into corporate, economic, tourism and spatial policy. Policy cuts across new planning system and holds up spatial planning. Uncomplimentary to county tourism plan. Various consultations held
	Casino Representations • Type 1: Standalone Casino • Type 2: Casino Hotel • Type 3: Casino Multiplex	Type 3 will provide a wide range of other activities besides a casino.	Type 3 will provide more facilities for visitors and locals. The representation will provide a focus for further regeneration and investment into the area it is situated.
	Casino Identity	Bondesque identity to reinforce grander aspects of resort history and character. Use Bondesque identity to provide point of differentiation from adult arcades on harbour side will positive image impact.	Bondesque identity will up-date and reinforce resort history and character. Identity to exclude the vulnerable at risk. Council wants influence on private sector identity conceived.
	Casino Location	In Torquay in primary tourism area with highest footfall. Away from arcades, late-night drinking on north side of harbour. Preference to be near quality hotels or Torquay Pavilion and seafront on east side of harbour.	In Torquay in highest night-time footfall area. Along the beach front or harbour side to provide visible 'pull' factor from town centre to primary tourism area.
	Cultural Compatibility	Negative effects on place of private sector conceptions. Concern on compatibility with current visitor market depending on identity. Up-market identity to compliment resort character and attract revitalise historic market.	Casino seen as socially acceptable. Torquay as best place for fit of up-market casino. Bondesque multiplex differentiates from arcades to re-image as cosmopolitan.

CHAPTER 9

9.1 COMPARING CASINO REGENERATION POLICY IN THREE SEASIDE RESORTS

This chapter discusses the main points gleaned from data gathered in the case studies, comparing the findings and highlighting similarities and differences. First, the integration of casino regulation into regional and local regeneration policy areas is reviewed. The chapter then goes on to compare various conceptions of casinos and views on the most suitable sites in which to locate them. The chapter concludes by comparing various issues related to casino development in terms of moral and social regulation, and the compatibility of different casino types with individual resort cultures.

9.2 REGIONAL POLICY INTEGRATION OF CASINO REGULATION

The *Gambling Act 2005* has thrown a potential lifeline to the three regional and local authorities associated with the case studies to utilise new casino development as a cultural regeneration tool. Local authorities have chosen this strategy over other forms of cultural regeneration such as a new museum, art gallery or other cultural choice that is not usually subject to moral or social regulation by society. The spatial reorganisation and transformation of these resorts through cultural intervention is seen by the three local councils as key to their regeneration plans, since the three locations are dependent on cultural consumption for their livelihoods. Integrating casino regulation into regeneration policy at regional and local governance levels has presented its own set of challenges.

At the regional level the main challenge in all three locations has been the link between regeneration and the expansion of a contested spatial practice perceived as having negative social impacts. National regulation created a link between these two very different activities. However, regional planners have had little to do with local licensing officers, or been involved in securing regeneration benefits from licensing policy.

It was also clear that regional planners in all three cases saw casino regulation as a top-down, mixed legislative instrument that lacked an evidence base on which to justify its introduction into regional plans. For example, evidence gathering through regional EIPs was only carried out in one of the three case-study areas (Yorkshire) by the CAP, and only related to regional casinos (now abandoned). Regional bodies noted that the DCMS and CLG did not require an

evidence base to support large and small casino development when directing the regions to strategically prioritise casino development. One regional planner (Scarborough: R1) who gave evidence at the EIP, pointed out that casino development had dictated a different strategic approach in regional regeneration planning terms, resulting in planning bodies acting as passive conduits of casino regulation by being directed to include casino development in spatial frameworks. This top-down directive (DCMS, 2004) contradicted normal regional planning and regeneration practices.

It is clear from looking at the three case-study regions that the East of England spatial and economic planning bodies were far more supportive of integrating casino regulation than Yorkshire and Humber and the south-west regions. Regional planning documents as far back as 2004 recognised the imminent changes in casino regulation and grasped the notion that casinos could be used to regenerate seaside resorts in the region. This support is evidenced by their RSS and RES casino plans (EEDA, 2008, GOEE, 2008). In contrast, although the spatial planning body for Yorkshire adopted casino regulation, regional and sub-regional economic bodies did not consider casino development as appropriate despite the potential for economic benefits (GOYH, 2008, YNYPU, 2010, YF, 2006a). For Torbay, the adopted RES did not support casino development, which according to the unadopted draft of the RSS could provide physical and economic regenerative benefits. Tourism policy for the region and sub-region also failed to embrace the casino development opportunity (SW Councils, 2010, SWRDA, 2005, SWRDA, 2006).

Most regional interviewees stated that integrating casino policy into regional policies was problematic. While the language used by interviewees varied, the essence of the problem remained the same. Firstly, integrating a new policy without an evidence base contrasted with normal regeneration evidence-based planning practice. Secondly, without evidence on which to base regeneration plans and the regional impacts of a contested practice, the policy was seen as, at best, a top-down experimental approach to regeneration that would have negative social impact and was not in line with a holistic approach to regeneration. However, it is clear that two out of three regions approached the linking the regeneration of economy, society and place with a contested activity cautiously. This indicated that regional-sub-regional support for a contested spatial practice and the public conception that was suggested (in national regulation) to represent it (which could provide additional physical and economic

regenerative benefits) was largely ignored. From interviewee opinions it was clear that at the regional level the majority had socially regulated against an activity they saw as ideologically opposed to their understanding of regeneration espoused by New Labour, by not integrating casino development into policy

9.3   LOCAL POLICY INTEGRATION OF CASINO REGULATION

As casino development became a possibility to regenerate resorts, the three local case-study authorities were still struggling to produce development plans under the 2004 planning framework. As well as working through the new planning process – which required thematic and geography-specific documentation underpinned by evidence bases – the local authorities, in their dual role as licensing jurisdictions, had to create new local gambling policies and casino regulations. These had to include local casino-premises licence competitions. Again, at this level, integrating national casino regulation into regeneration planning presented unique challenges.

Similar to the regional level, policymakers in Great Yarmouth were more enthusiastic than those in other resorts about integrating casino regulation into other policy areas. This authority dealt with casino development specifically in their community strategy, as well as economic development and tourism policies, and based its approach on a positive reading of the public's attitude to new casino regulations. However, in Torbay integration was more limited, and in the case of Scarborough nearly non-existent. Torbay's mayor interpreted the low, but positive, response to a casino consultation in 2006 (Torbay Council, 2006c) as a green light to continue his plans for development. He had already included casino development in his vision two years earlier (Torbay Council, 2004), and into economic regeneration and tourism policies, but not as fully as Great Yarmouth (TDA, 2007, 2010, Torbay Council, 2007b). Scarborough's chief executive showed support for casino development and included it as a small item in the council's corporate plan (SBC, 2005a). Although the plan was agreed in a public consultation, casino development was not itemised into other local policy areas. In both Torbay and Scarborough interviewees expressed dismay at the lack of scope and depth of the debate on casino development. This may partly explain why this regeneration strategy has not been more extensively incorporated into all policy areas. The lack of debate may be seen as a result of senior policymakers' concerns about not wanting to facilitate stronger social regulation of an economic regeneration plan they

supported, which could have been challenged through public consultation on individual planning strategies, such as those involving local communities, economic development and tourism in the case of Scarborough. The lack of evidence on which to justify the inclusion of casino regulation in other policy areas, and social regulation at the local policy level due to concerns about linking regeneration to a contested activity, may have added to concerns that wider consultation could have thwarted casino regeneration.

Another tension over casino regulation integration was that casino licensing and regeneration planning have been conjoined. This came at a time when local authorities were being asked to implement a new planning process by central government. Policymakers and community representatives from Great Yarmouth and Torbay expressed concerns about linking regeneration – a planning matter – with a licensing matter. As regeneration and licensing were always treated as separate matters by separate departments, they saw this link as flawed. In all three cases community representatives felt that linking regeneration to a contested practice from which vulnerable groups – the poor, benefit claimants and other deprived groups – had to be protected, but which threatens those groups with greater deprivation, was both socially contentious and ideologically unsound. Other local interviewees also expressed concern about linking a contentious practice to regeneration. Regeneration is about developing a holistic approach to regenerating economy, society and place, but these interviewees thought that casino regulation had a purely economic focus and wanted to see further social regulation to limit impact on the vulnerable.

Adding to the concerns about conjoining regeneration and licensing processes, the premises licence competition relies on the private developers of casino spaces submitting site-specific bids, which has complicated regeneration planning in all three jurisdictions. In Great Yarmouth plans for rejuvenation of the Golden Mile have halted (Great Yarmouth: LPM1), and policymakers in Great Yarmouth and Torbay believed that AAPs had been held up in part by the competition process. As premises licence bids are site-specific, AAPs and impact studies, on which plans need to be justified, cannot be completed. This delay is also the result of an internal disconnect where planning departments move at one pace and licensing departments at another (Great Yarmouth: LPM1). Timing on these two processes could have run side by side, but this was not the case as licensing departments were in fear of litigation

from the casino industry so all three local authorities were striving to make the competition process watertight (Great Yarmouth: LPM1, Scarborough: LPM1).

To illustrate the major perceptions and similarities and differences on how national casino regulation was integrated into regional-local polices Table 15: National casino regulation and regional-local integration provides a short summary.

Table 15: National casino regulation and regional-local integration.

Regional Perspective	Local Perspective
Regional Similarities	*Local Similarities*
Scarborough: Included in RSS. Not included in RES. Not included in sub-regional investment policy. Lack of evidence base **Great Yarmouth:** Included in RSS Lack of evidence base **Torbay:** Included in RSS. Not included in RES Not included in regional tourism policy due to cautiousness. Not included in sub-regional tourism strategy as not complimentary to outdoor activity, rural and coastal tourism. Lack of evidence base	**Scarborough:** Consultation restricted **Great Yarmouth:** Strategy fully integrated into local policies. Regulation cuts across new planning system and holds up other regeneration and spatial plans. Low key consultation. **Torbay:** Mayor's Vision propagates integration into corporate, economic regeneration, tourism and spatial policy. Policy cuts across new planning system and holds up spatial planning. Consultation restricted.
Regional Differences	*Local Differences*
Scarborough: Not included in RSS. Considered local licensing matter. **Great Yarmouth:** Full regional policy integration (RSS and RES) as economic strategy. Compliments cultural aspirations in regional plans. Adds to tourism planning aspirations. Regional tourism planners not consulted by DCMS or local authority. No role for voluntary sector. **Torbay:** Included in county spatial plans.	**Scarborough:** Casino included in corporate plan but not economic community and tourism policy. Local development partnership plans for North Bay casino. Local casino policy includes representation and location but not identity. Cautious approach as social impacts not fully understood. **Torbay:** Uncomplimentary to county tourism plan. Consultation formats limit participation.

9.4 CASINO REGENERATION IN TOURIST DEPENDENT ECONOMIES

It is evident from the case studies that all three resorts are reliant on tourism and the need to regenerate the tourism offer is linked to their economic success. It has been noted that at national level there was no framework for local authorities to define, measure or secure regeneration benefits that could potentially be derived from casino development (CAP, 2007, DCMS, 2004, OPSI, 2006, SOL, 2004a). Issues highlighted by interviewees in terms of regeneration of tourism that will lead to economic regeneration aspirations are compared and contrasted below.

In all three areas it was apparent that visitor facilities have been regenerated with Scarborough in particular recognised for its successes in this by the European Commission (2009). In the cases of Great Yarmouth and Torbay, spatial reorganisation and transformation of visitor to residential accommodation is being implemented to reflect changing demand (Butler, 1980, GYBC, 2011, Torbay Council, 2010g, 2010h). Employment will be increased through outside investment in new casinos, and the higher-spending markets attracted by casinos will project new tourist images and extend the tourist season (GYBC, 2006b, SBC, 2006c, Torbay Council, 2006b).

In an attempt to secure regeneration benefits, Great Yarmouth and Torbay included an abstract framework of regeneration criteria in their casino regulations as a guide for developers (GYBC, 2009c, Torbay Council, 2010f). On the other hand, Scarborough's casino regulation included a wish list of specific visitor facilities, attractions and other economic benefits they wished to see as part of casino development (SBC, 2009b), which could be easily assessed in terms of suitability and delivery. In the cases of Great Yarmouth and Torbay, the impact of schemes and regeneration benefits proposed by premises licence bids may be harder to assess due to the abstract criteria. The council frameworks for Great Yarmouth and Torbay address issues about what local communities want to see in terms of regeneration and what councils think is appropriate, but it was left to the private sector to conceive the representations and identities of casinos and the extent of regeneration benefits. It is clear that in all three cases public and private consultation on specific policies or schemes, such as The Edge (Great Yarmouth), and on local casino regulation, has influenced the scope and depth of debate.

In both Great Yarmouth and Scarborough a new casino was seen as an additional entertainment attraction that would aid regeneration of tourist facilities. The policy for Great Yarmouth, in particular, has expressed the desire for a casino that will invigorate the night-time economy and create more employment in the entertainment sector (GOEE, 2000, Great Yarmouth: LPM1, GYBC, 2005, GYBC, 2009c). In Scarborough tourism and business representatives and a local councillor also saw a new casino as a catalyst for invigorating the night-time economy too (Scarborough: BIZ1, BIZ2, BIZ3, IND1), but in both cases the utility of a casino adding to cultural provision was disputed. A community worker and local historian in Great Yarmouth saw casino development as in conflict with the cultural work

being done to revive the town's maritime heritage. Similarly, a sub-regional planner for Scarborough saw casino development as contradictory to its arts-based cultural regeneration strategy (Great Yarmouth: COM2, HIS2, Scarborough: SR1). At both destinations regeneration in terms of tourism and culture was clearly understood very differently by policymakers, as well as by community and business representatives. Casino gambling was seen as 'low' culture, with many of the interviewees hesitant to describe it as a cultural pursuit.

But in all three cases there was a consensus from a cross section of interviewees that casinos would provide differentiation from other seaside resorts. In Torbay, interviewees saw a new casino as a unique pull factor to enhance the resort's image and catalyse further regeneration (Torbay: BIZ2, COM1, COM2, COM4, CON1, LPM1, LPM3, Torbay Council, 2007b, p27). Interviewees from Scarborough also saw a new casino as upgrading the image of the town and attracting higher-spending visitors (Scarborough: BIZ1, BIZ2, BIZ3, COM2, IND1, LD1, LPM1, LPM2), while in Great Yarmouth interviewees thought a new all-weather complex would improve tourism and cut visitor leakage to nearby Norwich. (Great Yarmouth: LAB1, BIZ2, COM2, CON1, LPM2, LPM3).

However, many community representatives and some of the regional planners in each case saw this differentiation as a potential clash with traditional markets. Work has been done in each destination to strengthen associations with local cultural history and character. In the case of Great Yarmouth, this has focused on the town's maritime heritage (Great Yarmouth: BIZ2, GYBC, 2005). For Scarborough, this has focused on art, museums, creative industries and events (Scarborough's Future, 2009, Scarborough: SR1), while in Torbay it has focused on famous people from the area, commodification of its commercial fishing heritage and natural geography (Devon CC, 2006, Torbay Council, 2010e). Great Yarmouth council has stated that it hopes to attract a new market of 'fun gamblers' based on demand-side research for a new casino (DTZ Consulting, 2006), though community representatives thought this would clash with the family market. For Scarborough and Torbay, there is no evidence that any demand-side research has been carried out, so it is not known whether traditional markets would support a new casino.

In each case there was a majority view that casino-led regeneration is also constrained by geography, which affects access and the availability of suitable development sites. The landscape of Great Yarmouth (The River Yare, Norfolk Broads and marshes), the steep hills of Torquay and the topographical disconnect between Scarborough's town centre and foreshore are all problematic and could restrict large facility development in primary tourist areas. Geographic peripherality common to most resorts affects access and there is a concern about traffic congestion in all three locations. Though local plans exist in each case to improve connectivity to markets, central government funding for road improvement does not go far enough to support local aspirations for regeneration (Devon CC, 2004, Highways Agency, 2009, 2010). However, plans to improve access by sea are underway in all three destinations. In Great Yarmouth £40 million has been invested in the outer harbour scheme and plans are afoot to provide a roll-on-roll-off facility for continental traffic (East Port, 2010). Similarly, in Scarborough and Torquay facilities for leisure craft, fishing vessels and harbour-side visitor attractions have been improved over recent years (Torbay Council, 2010j).

As a shorthand illustration to the points made on casino regeneration Table 16: Casino regeneration in tourism dependent economies (p188), provides a regional and local perspective.

Table 16: Casino regeneration in tourism dependent economies.

Regional Perspective	Local Perspective
Regional Similarities	*Local Similarities*
Scarborough: Conjoins regeneration (including social) to contested spatial practice. Economic focus with social and cultural impacts ignored. **Great Yarmouth:** Un-tested strategy to support economic regeneration. Cause of social problems.	**Scarborough:** Provides a modernising cultural landmark and revitalises night-time economy. Adds to re-imaging of a quality town by the sea. Against casino expansion due to social concerns of vulnerable groups. Focus on economic benefits through tourism receipts for a town dependent on tourism.
Regional Differences	**Great Yarmouth:** Casino as regeneration signifier promotes further investment. Re-imaging of destination possible through strategy. Free choice and unlimited access will encourage vulnerable to gamble. Policy does not fully address social impacts. Economic focus of policy to encourage visitor and jobs growth. Potential for displacement of other casinos/adult entertainment due to overcapacity. Separating spatial requirements from licensing is flawed.
Scarborough: Damage to family values of resort. Can provide re-imaging of resort and rejuvenate facilities. Lack of understanding on size, scale and economic benefits of a small casino. **Great Yarmouth:** Ideological underpinning unsound by linking regeneration to gambling. Scrapping of demand test sidelines tourism market research and concerns on over capacity and biz displacement. Provides honey-pot to re-image and up-date resort to attract a new market. Lack of understanding on size, scale and economic benefits of a small casino. **Torbay:** Regeneration benefits only come from quality development to re-image resort. Lack of understanding on size, scale and economic benefits of a small casino. National policy lacks clarity on how to secure benefits from private sector. Acceptance that casino should have been included in tourism strategy, although questions about fit with current strategy. Public sector has little influence or involvement with developers (no partnership). Lack of understanding of interrelationship between licensing and planning laws. Casino development should be researched at local level.	**Torbay:** Casino is part of the wider regeneration agenda and broadens offer and shows resort progression. Catalyst for further tourism investment. Casino will provide good quality tourism jobs. Potential for over capacity of casino space. Policymakers frustrated that a casino site has not been able to be planned for. *Local Differences* **Scarborough:** Conjoins regeneration (including social) to contested spatial practice. **Great Yarmouth:** Concerns on amount of benefits offered in economic downturn. Potential for private funder's objectives being at odds with public policy. Casino strategy allows for local entrepreneurial spirit to regenerate tourism (night-time) reliant economy. **Torbay:** Ambiguity on how to secure regeneration benefits. Concerns that the local 'no change lobby' may socially regulate a winning competition bid. Low quality or single bid could distort policy aspirations and benefits expected. Promotes tourism and leisure provision for locals. Complexity of casino regulations not understood by some.

9.5   CASINO LOCATIONS

It was pointed out earlier that there was uncertainty on how to align casino regulation competition requirements with regional and local regeneration plans. This has led to uncertainty because private-sector developers are asked to include a site as part of a scheme for local licensing competitions (DCMS, 2008). More uncertainty has been created by national casino regulation, which requires a winning scheme to go through regular planning channels. Furthermore, the scheme must stand up to scrutiny by regional authorities and the general public in statutory consultations. This could be seen as a doubling up of regulation,

since if schemes are moderated in the planning process casino development may be put on hold. This could be due to unreasonable planning demands on the type of representation, its footprint, casino identity or Section 106 Agreements that ask for additional benefits or top-ups of benefits already bound up in a casino premises licensing agreement.

In spite of these uncertainties, interviewees were asked for their opinions on the best sites in which to locate a new casino, to inform understanding on the relationship between the culture of casinos and regulation. Many of the sites discussed had been subject to earlier consultations and were included in casino bids. Though Scarborough's casino regulation outlined areas in the town for developing a casino, (SBC, 2009b) policies for Great Yarmouth and Torbay did not. Site-specific consultations took place in Great Yarmouth and Torbay, but these sites were not mentioned in their casino regulations because of competition rules (GYBC, 2006b, 2008d, Torbay Council, 2006c). Sites mentioned in the Torbay council's local consultation in 2006 (Torquay Pavilion and Oldway Mansion) are significant Victorian cultural landmarks, which have contributed to its success as a seaside resort, while The Sands development site mentioned in Scarborough's jurisdiction bid was as significant for re-connecting North Bay to the rest of the town. Both sites were referred to in the CAP's final report (CAP, 2008, GYBC, 2006b, SBC, 2006c). Torbay's licensing jurisdiction bid did not specify a site (CAP, 2008, Torbay Council, 2006b).

In the case of Great Yarmouth it is evident from all regional and local interviewees that the preferred location for a new casino was in the primary tourist area, on or around the Golden Mile, with many interviewees suggesting the brown-field car park site at the end of the Golden Mile proposed in The Edge planning application as the best option (Great Yarmouth: BIZ1, BIZ2, COM2, CON1, HIS2, LPM1, LPM2, LPM3, R1, R2, R4, R5, GYBC, 2008b). Interviewees in Torbay also felt that that the primary tourist area where footfall was highest would be the most suitable location (Torbay: COM1, CON2, COM3, COM4, LD1, LPM1, LPM2, LPM3, R1, R2, R3, SR1), with many community representatives singling out the Torquay Pavilion adjacent to the harbour area (Torbay: COM1, COM2, COM3, COM4). However, regional interviewees thought that any casino development should be located away from the penny arcades and adult gaming centres also located in the harbour area.

While there is broad agreement that high-footfall areas would be the best locations in Great Yarmouth and Torbay, this was not the case in Scarborough. The town's bid selected North Bay for development, but in its final report the CAP expanded the options to include the un-named site mentioned in Scarborough's bid in the traditional seafront area in South Bay (in the primary tourist area) (CAP, 2008, SBC, 2006c) . The following year, the council asked for premises licence bids from developers to consider sites in North Bay, South Bay and town centre areas (SBC, 2009b), but because of national regulation sites were not specified, and none was mentioned by policymakers in interviews (Scarborough: LPM1, LPM2, R1, R2, R3). Most business and community representatives opted for a location in either North Bay as part of The Sands development (Scarborough: BIZ2, BIZ3, COM2, COM3) or on the primary footfall area of the Foreshore (Scarborough: COM2, IND1, LD1, SR1), including the Futurist Theatre (the un-named site in the CAP bid) although the council discouraged debate on this site. Overall, all three towns agreed with the CAP that locating casinos in primary tourist areas would be the best option for regeneration. However, the representations and identities, internal facilities and scale of casinos within these preferred locations must also be considered to explore their potential cultural impact.

As a shorthand illustration to the points made on the locations for casinos, Table 17: Casino locations, illustrates regional-local choices for casino sites.

Table 17: Casino locations.

Regional Perspective	Local Perspective
Regional Similarities **Scarborough:** Primary tourism area - Foreshore for Las Vegas identity. **Great Yarmouth:** Primary tourism area - Golden Mile location. **Torbay:** Torquay in primary tourism area with highest footfall.	*Local Similarities* **Scarborough:** Primary tourism area in South Bay **Great Yarmouth:** Primary tourism area - Golden Mile (for Bondesque identity). **Torbay:** Torquay in primary tourism area with highest night-time footfall area. Primary tourism area along the beach front or harbour side to provide visible 'pull' factor from town centre.
Regional Differences **Scarborough:** Town centre for Type1 or Type 2 with Bondesque identity. **Torbay:** Away from arcades, late-night drinking on north side of harbour. Preference to be near quality hotels or Torquay Pavilion and seafront on east side of harbour.	*Local Differences* **Scarborough:** Informal development coalition sees North Bay as most suitable for up-market identity. **Great Yarmouth:** Best located at end of Golden Mile to create up-market entertainment bubble.

9.6   VISIONS FOR CASINOS

It is clear from national regulation that the government had conceived explicit representations for regional and large size casinos, but not for small ones, and also specified a variety of non-gambling facilities that should be included, such as 'hotel accommodation, conference facilities, a restaurant, bars, areas for live entertainment and other leisure attractions', to maximise regeneration benefits (DCMS, 2004, p1). In addition, regulation provided guidance for large and small casinos on minimum floor space for non-gambling and gambling areas, but maximums were not set and gives developers free reign to propose schemes that offer substantial non-casino activities and other tourism provision. This framework sets the backdrop for the discussions on how public and private conceptions of casino representations and identities (for example, large casinos in national policy and the identity of The Edge development in Great Yarmouth) have been perceived and moderated by interviewees, in terms of what they thought was best suited for the regeneration of resorts. It is not surprising that the regional-size representation has been reinterpreted by policymakers in each case (GYBC, 2009c, SBC, 2009b, Torbay Council, 2010f), since this scale of development would deliver the most benefits.

It was evident from all three case studies that the majority of interviewees saw the Type 3: Casino Multiplex as the best option. In terms of particular identities, two views were expressed. The majority favoured a European Bond-esque identity, as it would signify resort regeneration, but some interviewees in Great Yarmouth felt a Las Vegas-style, mass-market facility would appeal to a wider audience and could enhance the resort's image if it reflected local maritime history and tradition. However, in two out of three cases a number of interviewees pointed out that a Bond-esque identity would exclude vulnerable groups, who might feel uncomfortable in such an up-market environment.

These views were based on little understanding of the extent of increased gambling capacity by many interviewees, and what it would involve in terms of the scale of table games and slot machines, since the issue of casino capacity was never consulted on (GYBC, 2009d, SBC, 2009e, Torbay Council, 2009d). This suggests that policymakers had assumed private conceivers of casinos would provide the maximum capacities allowed under national regulation, though they may also have wanted to avoid creating a further reason for the public to socially regulate casino gambling. This was reinforced by the negative views about

gambling expressed by most community representatives, but most policymakers and business people thought that placing casinos in or near culturally significant spaces was not cause for concern.

This observation is also supported by interviews conducted with local groups in Great Yarmouth, who were unperturbed by an increase in casino gambling capacity as there was already plenty of gambling in the area. However, in Scarborough and Torbay interviewees from all groups expressed concern about over-capacity, commenting that current capacity was not being fully used. Since national casino regulations exclude a test for demand, no data was collected on marketability or capacity requirements, but most interviewees were nonetheless keen to see casino capacity increased if it contributed to regeneration.

In all three cases interviewees warned that increased capacity might lead to existing casinos and adult entertainment centres being displaced (Great Yarmouth: BIZ1, COM1, COM2, CON1, HIS1, R2, Scarborough: COM1, COM2, IND1, LD1, Torbay: COM4, COM5, LD1). Vacant properties could have a negative effect on resort image and negate the proposed effects of casino development as a driver for regeneration. DTZ Consulting (2006) reported that there was evidence of demand for additional casino facilities in Great Yarmouth, but there was no such evidence for Scarborough and Torbay, indicating a research gap. And though the DCMS and regional planning bodies recommended that licensing jurisdictions carry out research into the economic and social impacts of development, this was only done in Great Yarmouth. Doing away with the statutory demand test may have encouraged local authorities in Scarborough and Torbay not to follow the advice of regional planning bodies. However, one theme contained in the Acts of both 1968 and 2005 is that of protecting the young and vulnerable. But in the case of the 2005 casino regulations, regenerating resorts through casino development has created its own set of social and moral tensions. These will be discussed in the next section.

As a shorthand illustration to the main points made in this section, Table 18: Casino representations and identities (p193), illustrates similarities and differences between interviewees' views on the representation and identities of casinos at regional and local levels.

Table 18: Casino representations and identities.

	Regional Perspective	Local Perspective
Casino Representations • Type 1: Standalone Casino • Type 2: Casino Hotel • Type 3: Casino Multiplex	*Regional Similarities* **Scarborough:** Mixed opinion: Type 1 or Type 2 that cloaks the gambling activity. **Great Yarmouth:** Type 3 as it provides lots of facilities. Type 2 suggested as cloaking device to exclude and protect vulnerable. **Torbay:** Type 3 will provide a wide range of other activities besides a casino *Regional Differences* **Scarborough:** Type 3 as brash identity to fit with seafront attractions.	*Local Similarities* **Scarborough:** Type 3 as offering best economic benefits and facilities for residents. **Great Yarmouth:** Type 3 as it provides lots of facilities for visitors and residents. Type 3 provides a catalyst for further regeneration investment. **Torbay:** Type 3 will provide more facilities for visitors and locals. Type 3 will provide a focus for further regeneration and investment into the area it is situated.
Casino Identity	*Regional Similarities* **Torbay:** Bondesque identity to reinforce grander aspects of resort history and character. **Scarborough:** Bondesque identity for Type1. *Regional Differences* **Scarborough:** Las Vegas identity for Type 3 depending on representation and location. **Great Yarmouth:** Abstract identity with modern edge that signifies a quality resort but connected to maritime history. **Torbay:** Use Bondesque identity to provide point of differentiation from adult arcades on the harbour side will positive image impact.	*Local Similarities* **Great Yarmouth:** Bondesque identity but in a specific location. **Torbay:** Bondesque identity will up-date and reinforce resort history and character. **Scarborough:** Bondesque as most suitable to reflect character and history of resort. *Local Differences* **Torbay:** Identity to exclude the vulnerable at risk. Council wants influence on private sector identity conceived.

9.7   SOCIAL AND MORAL TENSIONS

In every case-study location there were social concerns about placing casinos in deprived areas, with demand for stronger social regulation taking precedence over moral issues. Overall there was a fear that the poor, unemployed, low earners and adolescents would all be put at risk. At the regional level, however, most interviewees distanced themselves from the social problems, feeling that these should be dealt with at local level and not by regional intervention. At local level it was mostly community representatives who were most concerned about developing casinos in deprived areas. Business representatives, policymakers and local politicians were more likely to be supportive of casino expansion and to assume that problem gambling was already being dealt with by voluntary organisations such as GamCare. They also thought that the issue had been addressed by placing responsibility for this on casino operators.

However, local authorities in all three cases have not addressed this issue other than by shifting the responsibility to casino operators, in line with national casino regulation. Social impacts were not addressed adequately in the consultations either. A number of community representatives were critical of this lack of debate, believing that authorities had a duty of care to victims of problem gambling and that the issue should not have been left to casino operators alone.

Opinions on social impacts varied from case to case. In both Great Yarmouth and Torbay some interviewees predicted that the division between different demographic groups – rich tourists and deprived locals – might be highlighted by a Bond-esque type casino and contribute to a negative image of the resort (Great Yarmouth: R1, R4, Torbay COM1, COM5). Additionally, in both Scarborough and Torbay, some community representatives, feared that a casino might attract anti-social and criminal behaviour (Scarborough: COM2, Torbay: BIZ1, COM2, COM5).

Although national casino regulation protects children and adolescents, there were concerns about these groups, too. Community representatives from Great Yarmouth and Scarborough reported that young people were already gambling for small stakes (Great Yarmouth: HIS1, Scarborough: COM2) and might ultimately progress to higher-stake gambling if a new casino was developed, while in Great Yarmouth it was felt that the issue of abandoned children had not been taken into account (Great Yarmouth: COM2, COM3, CON1, LPM1, LPM2, LPM3).

Although in Great Yarmouth it was mostly community representatives who were calling for stronger social regulation, they also accepted that casino development was going to happen (Great Yarmouth: HIS1, HIS2, COM1, COM2, COM3). Many felt that local gambling policies were based on a blinkered view of the negative effects that might result. In only one jurisdiction – Torbay – had the council asked casino developers to address the effects of gambling on the community as whole rather than just on site, as in Great Yarmouth and Scarborough (Torbay Council, 2010f).

By contrast, planners from Great Yarmouth – where there are multiple gambling opportunities – and a politician from Scarborough thought casinos were just an extension of public house slots, seafront amusement arcades and other existing gambling activities

(Scarborough: IND1, Torbay: LPM1, LPM3) and that gambling would only be a marginal activity within a multiplex, implying that the principal focus of such places would be entertainment (Great Yarmouth: LPM1). A community representative, however, cautioned that vulnerable groups would be excluded from the potentially up-market facilities of a Bond-esque multiplex, reinforcing social division in an already divided community (Great Yarmouth: COM2). In the main, however, interviewees agreed that casinos would help regenerate leisure facilities, but felt that social regulation should be considered in equal proportion to economic and physical regeneration.

9.8   CULTURAL COMPATIBILITY: RESORTS AND CASINOS

In this section the relationship between casino development and the cultural nuances of each resort are compared and contrasted. Secondary evidence illustrates that casino regulation has provoked debate on testing and moderating the social impacts of casino regulation, as guidance at national, regional and local levels has failed to take account of the impact of expanding casino culture on communities and the places in which they live. Furthermore, policy frameworks and casino regulation have not considered the impact of casino development on patterns of cultural consumption in resorts. This is evident due to the limitations and in some cases complete lack of regional-local research on casino expansion. Discussion will now focus on the complementarity of casino culture and resorts as perceived by interviewees.[35]

At regional and local levels some interviewees voiced concerns about the impact of casinos on community and individual cultural values, as well as on the meanings and traditions of resorts. For example, two interviewees (from Scarborough) perceived casinos as downmarket (like Blackpool), but most felt that complementarity would be dependent on the identity of casino spaces.

Most east-England interviewees thought that casinos would fit comfortably into Great Yarmouth's resort environment, and that in the context of neon-lit piers, seafront amusements and adult-entertainment arcades as well as other gambling outlets a casino would make a positive addition (Great Yarmouth: BIZ2, COM1, COM2, COM3, CON1, HIS1, LAB1, LPM1, LPM2, LPM3, R1, R4, R5). According to two community representatives and a

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[35] Torquay's resort culture is examined in particular, since it was considered the most suitable location for casino development in Torbay.

policymaker, the town's history as an international commercial port and trading place had created a culture of entrepreneurship and adaptability, influenced also by the expansion of tourism in the Victorian and Edwardian eras. Entrepreneurial values have always existed, and creating a new market i.e. 'fun gamblers' through a casino complex was central to those values. However, if a casino excluded the traditional market – which perceives the town 'as a cheap and cheerful holiday resort' (Great Yarmouth: COM1) – the resort's cultural template could be affected (Great Yarmouth: R4). Although casino development was seen as complementary to the town, the identity of the casino would therefore need to be carefully considered (Great Yarmouth: LMP1). This attitude effectively implies the need for cultural regulation of casino development. By taking both community (an innovative attraction that complements the town's maritime heritage) and resort (cheap and cheerful family holidays) cultural templates into account, the values of residents and visitors may coalesce, but if the casino identity conceived by developers fails to attract a market, the town will seek an alternative attraction.

Scarborough and Torquay have also been subject to many cultural influences (through port activities – mostly leisure in the last two centuries – and international connections), but in comparison with Great Yarmouth have developed a less adaptive culture. The dynamic in these resorts – with their grander social histories – has been adapting to visitor demographics that have spiralled steadily down-market. Resistance to this downward spiral was evident from interviews, and rather than adjusting to these new realities host communities felt strongly that the previous culture, with its grand historical symbols, needed revitalising. However, in both cases interviewees were keen to reiterate that – like Great Yarmouth – the main market on which the resort relied was family trade.

In both Scarborough and Torquay, variations in visitor demographics have affected perceptions of what sort of identity should be assigned to casino developments. The majority of interviewees preferred the Bond-esque model on the grounds that this would not dominate the resort landscape. This preference and the need to exert control over a symbol of a contested activity amounts to a form of social regulation, though attracting up-market visitors is already engrained in the resort templates. In both cases, many business representatives and policymakers saw an opportunity to upgrade resort facilities through the identity of a casino, but community representatives and some regional planners thought it might create a stark

cultural contrast between those who could or could not afford to use the casino, and might alter visitor profiles (Scarborough: COM5). In general, however, the dominant view was that regenerating the resort culture of the past through demure, up-market casinos would complement the resorts' histories and cultural values (Scarborough: BIZ2, BIZ3, COM3, IND1, LPM1, LPM2, R1, R3, Torbay: BIZ1, BIZ2, BIZ3, COM1, COM2, COM3, COM4, LPM1, LPM3, LD1, R1, R2, R3).

As a shorthand illustration to the points made on the cultural compatibility of casinos and resort cultures Table 19: Cultural compatibility of casinos, illustrates similarities and differences in interviewee perceptions at regional and local scales.

Table 19: Cultural compatibility of casinos.

Regional Perspectives	Local Perspectives
Regional Similarities	*Local Similarities*
Scarborough: Large representation unsuitable to family character of resort and social concerns. Bondesque identity will suit resort character and history. **Great Yarmouth:** Complementary to the resort culture and myriad gambling outlets already on offer. **Torbay:** Bondesque identity to compliment resort character and revitalise historic market. Concern on compatibility with current visitor market depending on identity.	**Scarborough:** Identity, depending on location, is compatible with character of history of resort, that includes games of chance i.e. Bondesque in up-market North Bay is compatible. **Great Yarmouth:** Large casino is complimentary to blue collar resort culture. **Torbay:** Up-market identity to compliment resort character and attract revitalise historic market.
Regional Differences	*Local Differences*
Torbay: Negative effects on place of private sector conceptions.	**Great Yarmouth:** Adds to current gambling provision and could create an East of England gambling mecca. **Torbay:** Negative effects on place of private sector conceptions. Concern on compatibility with current visitor market depending on identity.

In this chapter various comparisons between the three case-study resorts have been made, and major issues and nuances explored, regarding the integration of casino legislation into regional and local spatial policy. Comparing perceptions of how casino regeneration would affect tourism and local economies followed this. The next sections looked in detail at different views on casino identities and sites and how these would affect the culture of each location, as well as at social and moral tensions. The following chapter develops these points further, while referring back to the literature and theoretical framework to inform discussion.

CHAPTER 10

10.1 CULTURAL POLICY ANALYSIS: CASINOS AND REGENERATING RESORTS

This chapter looks at the case studies findings in the context of du Gay *et al*. *Circuit of Culture* (1997) and Lefebvre's *Production of Space* (1974) theoretical perspectives, which have underpinned the thesis. Two elements of Lefebvre's views on producing space were used to frame analysis of casinos as regeneration tools, particularly how conceived and perceived space intersected with the elements of regulation, and the production of the representation and identity from du Gay *et al*. This approach was considered the most thorough way to explore the central proposition: **Casino regeneration creates new policy processes that need to take account of cultural meanings, values and traditions in seaside resorts.**

Understanding the conception and perception of policy processes in terms of the regulation element (du Gay *et al*., 1997) within the *Circuit of Culture* has prompted questions about the social and moral perceptions of casino development and its cultural context. This emphasis on the cultural dimension is important for making sense of casinos as an instrument of cultural regeneration in relation to traditional images and cultures of seaside resorts. Casino regulation had its own distinctive effects on conceptions and perceptions of casino development, particularly in terms of how a casino is produced. These impacts will be discussed in the later part of this chapter once a clear understanding of casino regulation has been reached.

10.2 REGULATING CASINO DEVELOPMENT

National regulation of casinos has been a contentious subject. Secondary evidence indicates that many agencies involved in scrutinising legal regulation considered the social regulation of casinos weak, which lead to concerns of creating further social dysfunction in society. The Parliamentary Joint Committee was cautious in its examination of casino legislation, noting that conflicting evidence had been presented (SOL, 2004a, 2004b). This provoked concerns about reconciling a contested cultural practice with protection of the young and vulnerable. There were also concerns about how regeneration benefits could be harnessed (SOL, 2004a), with the minister responsible for gambling saying, 'It is very difficult to know how to

"require" economic benefits' (SOL, 2004a, p93). The committee also noted problems with integrating a policy shared between the DCMS (responsible for gambling regulation) and the CLG (responsible for regional and local regeneration planning) into regional spatial strategies (SOL, 2004a).[36]

Although the joint committee raised many issues during their inquiry, the government decided to proceed, but issued a national policy statement to provide clarity, which accompanied the Bill on its passage through parliament. However, the weakness of the rationale behind draft casino regulation was also apparent in this national policy statement. The word *casino* was not adequately defined and mechanisms to harness regeneration benefits were not detailed (DCMS, 2004). Importantly for this thesis, Stokowski's (1996) observations on the way in which casino development encroaches on and changes the symbols of history, landscape and culture to suit a new type of visitor were also not taken into account. Furthermore, national policy guidance did not advise on or ask conceivers of public space at lower regulatory levels to consider the specificities of place, when it is clear that regeneration and place must be linked for successful intervention. Regeneration experts see place-specific cultural identities as crucial to regeneration planning (Harvey, 1989, Jameson, 1998, Massey, 1994), but in the Gambling Act 2005 (OPSI, 2006) these issues were left unaddressed. This produced confusion on how to align three distinct issues: neo-liberal ideology on free-market practices and free choice (McGuigan, 2005); global consumption trends (Massey, 1994), in this case of a contested spatial practice; and the view that regeneration planning needs to create an overarching policy that accounts for the economy, society and place (Richie and Crouch, 2003).

It is clear that Dredge and Jenkins (2003) are correct in their observation that global free-market pressure to homogenise tourism products – in this case the physical symbol of a contested practice – can create conflict with local cultural templates, as evidenced by Stokowski's (1996) references to conflict between communities and visitors in Black Hawk, Colorado. Combining neo-liberal ideology with a regeneration practice that uses private funding to regenerate economy, society and place is problematic, as the identities of new cultural artefacts may not be compatible with local place and culture. Since those artefacts and identities will dictate how individuals react (Jameson, 1998), it is necessary to understand

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[36] The current Conservative government came to power in May 2011. On the 6th July 2011 Eric Pickles the Secretary of State for Communities and Local Government scrapped regional strategies (DCLG, 2011).

the cultural impact of casino regulation in the context of regional and local regeneration planning.

It was not surprising that in attempting to conform to both regional and local spatial policy further weaknesses in casino regulation were exposed. Although a regional regulatory tier existed, in Lefebvre's term to 'conceive' space, casino regulation was not required to pass through it until it became a land-use planning matter (DCMS, 2004, OPSI, 2006).[37] This was a unique situation in terms of policy making and implementation, and a wholly new approach to two different government agendas. The first agenda was concerned with modernising out-dated gambling laws, while the second was about facilitating private finance to deliver regeneration benefits. Among regional planners, there was a general perception that this was a top-down strategy that mixed the known elements of spatial and economic planning with the unknown element of licensing a contested activity. In Scarborough, regional planners had to 'bolt on' (Scarborough: R1) casino policy to spatial plans to create a land-use strategy. But with casino regulation conjoined to local regeneration planning, regional planners in south-west England (Torbay) were reluctant to include casino policy in regional economic strategies. In two out of three cases, social regulation on the part of regional planners resulted in resistance to the casino regeneration strategy, and minimal direction was given in spatial plans (DCMS, 2004).

Although the regions were required to include casino regulation in their regional spatial policies, regional planners thought that basing regeneration plans on the outcome of a licensing competition aimed at expanding a contested practice was an experimental and a flawed approach to regeneration, which would produce mixed messages. Regional policymakers tasked with addressing resort decline and deprivation were apprehensive about supporting gambling, since the activity did not conform with what was required to address these issues (Dredge and Jenkins, 2003). As Couch and Fraser (2003) contend, regeneration is also about restoring social function, which conflicts with casino regulation. In addition, many regional planners saw casinos as incompatible with individual resort culture, and believed it encouraged deviancy. (Rojek, 1999, Sternlieb and Hughes, 1983). It is not surprising that in two cases economic development and tourism plans excluded support for casino regulation.

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[37] This is no longer the case as regional planning bodies are now defunct.

Added to this, local licensing officers had little to do with regional planners in respect of spatial, economic development and tourism plans, which further detached regional planners from the casino regeneration strategy. Regional development agendas do not always complement those at local level, particularly in the case of resorts reliant on tourism, and the evidence indicates that regional policymakers were by-passed in terms of influencing place-specific regeneration and licensing. It was therefore no surprise that, in all three cases, the cultural implications of casino expansion for the histories and traditions of the resorts was not researched at regional level.

The different treatment of casino regulation at regional level could be seen as a case of social and moral regulation moderating legal regulation. This moderation may have been used as a mechanism to protect those in need, i.e. the young and vulnerable, by public conceivers of space (policymakers). In the cases of Scarborough and Torbay, where resort traditions are based on the values of the better off, there seemed to be an altruistic motivation to protect the less well-off. This may account for the lack of in-depth analysis or research on the potential impact of casino expansion, in case the strategy was deemed a social and moral hazard. However, in Great Yarmouth, regional planners had few qualms about embracing this regenerative opportunity, although analysis of its potential impact was also lacking.

It is apparent from the case studies that the cultural impact of regeneration on place was poorly addressed by public policy. The meanings and symbols attached to casino development were not considered in top-down legislation, or in regional and local spatial and economic development plans, and instead were sidelined in favour of economic priorities. Although casino expansion plans were seen by many local policymakers and business people as a way to contribute to resort product restructuring, both the principle of delivering inward investment, job creation and place enhancements, and its implementation, lacked sound ideological underpinning. This same concern applied to the issue of how to protect young and vulnerable groups. These tensions were reflected in the cautiousness of many interviewees to advocate a regeneration strategy that lacked a robust evidence base (Etches, 2011, Scarborough: R1).

At local level the discourse on casino expansion took a different form. Local authorities had the power to facilitate and prioritise casino development, but this created incompatibility with

regional regeneration agendas. This was proven by their almost total control of the casino licensing process. As Rubenstein (1984) has noted, these new cultural spaces will impact on a wide spatial scale and the cost of negative impacts may have to be dealt with by other local authorities in resort catchment areas further afield. Furthermore, the acceptability of casino expansion may not sit well with social and moral regulators in the affected regions. This problem is likely to be amplified by the fact that new casinos will be larger than their local competitors. As Riddell (2004) observed, regional-local consultation to shape local spatial and economic plans has not aided casino planning or its potential impacts.

On the other hand, the new casino formats may also amplify the economic impacts on case-study resorts (Collins, 2003), which in general have been perceived as positive and would be effected by business start-ups, casino job creation and the multiplier effect of tourist spending (Collins, 2003, Eadington, 1996, 1998, Lee, 2006, Myers, 1991, Smith, 2006, Stansfield, 1978, 1996, Sternlieb and Hughes, 1983). There was also a general perception that casinos could help revive the image of these destinations (Agarwal, 2002, Butler, 1980, Ritchie and Crouch, 2003). However, as Myers (1991) points out, positive economic impacts may be offset if casino operators repatriate profits to areas outside the local or regional economy, and property price increases influenced by casino development could affect other local development values. In addition, gamblers who lose money create a potential loss in other forms of consumption, such as household goods, and tourist products elsewhere (Collins, 2003, Sternlieb and Hughes, 1983). These factors have their own set of social consequences, such as poorer families going without certain goods due to income lost in a casino (Reith, 2003). It is clear from local licensing policy that each location has sought to harness the positive economic impacts of casino development without taking responsibility for the potential negative impacts, though, again, research by local and regional authorities was lacking in this area.

According to Reith (2003), the negative social impacts derived from problem gambling include loss of disposable income, family break-up, unemployment, debt, violence, and alcohol and substance abuse. Responsibility for dealing with problem gambling has been assigned to casino operators, who are expected to moderate behaviour and cover the costs of remedial action. But while Torbay has asked operators to consider social impacts beyond the immediate area of the casino site itself, neither of the other jurisdictions has considered the

regional and sub-regional impacts. Rubenstein (1984) found that the effects of problem gambling in Atlantic City had been exported throughout the state of New Jersey. This suggests that local authorities within casino catchment areas will have to allocate extra resources to deal with the adverse impacts of an activity over which they have little or no control. It is clear that CAP's interpretation of 'best possible test of social impact' (CAP, 2007b, p14) did not take account of this aspect of casino expansion and points to a flawed social-impact test methodology. A similar problem affects national and local casino regulation, which has also failed to address the issue of wider social impact.

10.3   INTEGRATING CASINO REGULATION WITH OTHER POLICY AREAS

Casino regulation is a mixed instrument that combines casino licensing with regeneration planning. In order to explore the central thesis proposition quoted at the beginning of this chapter, the impact of this regulatory instrument on spatial, economic, cultural and community policies needs to be understood. This section therefore looks at the processes of policy integration.

The three casino licensing jurisdictions all created new casino regulations in the form of local gambling policies, which set out the parameters of a licensing competition. Bidders for casino licences were directed to include site proposals as well as regeneration benefits for communities and tourism in their competition proposals. Using the conceived- and perceived-space elements within the cultural regeneration policy analysis framework (Diagram 4, p43) as a lens through which to view the contributions of public policymakers in regenerating tourist spaces, it can be seen that many regarded casino regulation as the key to revitalising their economies. However, re-imagining resorts in this way were also perceived as problematic, and in some cases incompatible with integrating the strategy into other policy areas.

Many policymakers voiced frustration with the regulation as a way of integrating casino development with regeneration planning. Because the licensing competition process runs in parallel with planning regulations, it creates a unique mixed regulatory instrument and delayed implementation of the Planning and Compulsory Purchase Act 2004 (OPSI, 2004). Most of those interviewed saw this instrument as deeply flawed in its attempt to link a socially and morally contested practice to economic, social and physical regeneration. In the

preceding section it was noted that casino regulation does not take account of social and economic regeneration agendas at local and regional levels.

In the case of Great Yarmouth, the regulatory process had set back plans for the physical regeneration of its seafront area. A policymaker summed up his frustration, saying, ''It's just about the worst piece of legislation I've ever seen drafted' (Great Yarmouth: LPM1). Many of the business and community representatives also felt casino development had been 'cloaked with mystery' (Torbay: COM5) on account of the competition process requiring potential development to be kept secret. This has created uncertainty in spatial planning terms and delays in finalising local area action plans (which include site-specific interventions). Further confusion and uncertainty was caused by the fact that regeneration and gambling licensing have always been treated in the past by separate departments. This was noted back in 2004, when a parliamentary committee recommended that the ODPM (the national planning body at the time) and DCMS work together to resolve the conflicts attached to licensing policies (Parliament, 2004b).

The theoretical underpinnings of the cultural regeneration policy analysis framework can be used to explore these reasons for confusion further. On the basis of Milgrom's (2008) insight into Lefebvre's (1974) thesis, it is evident that local public conceivers of space have created 2D non-site-specific plans for the purposes of casino licensing. But due to non-completion of the competitions, public conceivers lack understanding of the 3D structures that may eventually be built. These 2D conceptions may therefore result in symbols that may not be culturally compatible with the attributes of a particular resort. This is especially problematic considering that most interviewees advocated a Type 3: Casino Multiplex, which does not currently exist in case-study locations. Once licensing competitions are finalised and licenses granted, 2D plans are open to further interpretation of how they would fit into wider spatial plans (Schmid, 2008, Milgrom, 2008). Caution has therefore been a pragmatic strategy when conceiving new spaces that represent a contested spatial practice, and that need to be compatible with other areas of planning such as social regeneration.

Consequently, plans for restructuring tourist areas were dependent on defunct 2D representations of casino spaces, which made assessing the impacts of casinos particularly problematic for interviewee groups (Schmid *et al*., 2008), and may cause conflict in future if

the 3D identities of casinos are seen as incompatible with local culture (Dredge and Jenkins, 2003). [38] [39]

There was also evidence in two cases (Great Yarmouth, Scarborough) that land allocation and resources to develop casinos had come from temporary development coalitions (Holman, 2007), which had been formed specifically to deal with a single aspect of development (Agarwal, 2002). Due to late publication of national regulation on licensing competitions, these coalitions later broke up, since local licensing jurisdictions rejected any proposal that could result in litigation.[40] However, 2D private plans appear to have influenced public ones, as in one case the public visualisation of a development almost mirrored that of The Edge in Great Yarmouth.

In this case there was also evidence that a homogenised casino identity had been proposed that offered little that was sympathetic to local cultural and place attributes. The nondescript modern design of The Edge lacked any reference to the resort as a place or to the particular maritime history of Great Yarmouth. Homogenised identities like those in Colorado (Stokowski, 1996) may not be easily marketed to visitors who expect cultural symbols to reflect the distinctive attributes of resorts (MacNagghten and Urry, 1998, Ritchie and Crouch, 2003). The result may be that the 3D physical conception of a new casino, which is intended to bring differentiation to the restructuring process, is not properly embedded in the resort's character and heritage (Molotch *et al.*, 2000, Relph, 1976). This in turn could affect the resort's physical and economic transformation (Agarwal, 2002) and lead to further socio-cultural regulation of casinos to make them more compatible.

Another problem related to the differences between the 2D and 3D conceptions of casinos is highlighted by the cultural regeneration policy analysis framework. Analysis of the regulation

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[38] In Great Yarmouth planning permission was received for the development of The Edge casino multiplex in 2006. In Scarborough, The Opera House casino received planning permission in 2008 from Scarborough Council to extend the operation to include a hotel and other facilities in the multiplex format. These developments never went ahead as any new casino developments became subject to new licensing and competition regulations in 2008.

[39] According to Schmid (2008) understanding Lefebvre's dialectic between the semiotic and phenomenological is about creating a logical trialectic discussion that takes into account an interpretation of the creative symbols (in this case the symbolic representations – the identities – of casinos), and the differences in understanding between the actions and behaviour of the actors involved. Therefore public conceivers that have articulated a two dimension conception in casino regulation, become perceivers in the competition process of the private conceivers two dimensional casino spaces (Schmid *et al.,* 2008).

[40] It was reported that in March 2011 the bidding process for the small casino licence in Scarborough has become litigious. One of the licence bidders and who also owns The Opera House casino is bringing a case against the local authority on the basis of unfair treatment in the bidding process (Yorkshire Coast Radio – Website, 2011). A council official from Scarborough Borough Council who was interviewed for this thesis in 2009 was contacted in March 2011 but would not comment on this matter.

element within the theoretical framework reveals that there was a conflict between spatial regulation (for example, AAPs) and casino licensing. Legal regulators (licensing officers) were seen as implementing just a part of local casino regulations and leaving it to spatial policymakers to fit it into a broader re-imagining of local cultural spaces. This conflict appeared in different ways. Spatial policymakers can take account of the character and heritage of a place by allowing cultural spaces that underpin local distinctiveness (Molotch *et al.*, 2000). For example, Great Yarmouth has myriad small-stake gambling arcades along its seafront promenade, which interviewees saw as complementary with casino expansion. But Stokowski (1996) reported that in Colorado development caused a shift in cultural templates, and local residents in two mountain towns contested casinos that were considered incompatible with local heritage and character.

However, in the UK the parameters of national regulation of gambling will restrict the choices that both public and private conceivers of casino spaces can make. For example, restriction on the number of slot machines permitted in a small casino is standard legal regulation. If a resort like Great Yarmouth – which already provides small-stake slots in seafront arcades as part of the traditional seaside experience – wanted to increase the number and size of payouts through a much larger casino, they would be unable to do so. This means that spatial and tourist policy that wants to take account of the history, character and distinctiveness of resort places may be restricted by regulation. This could be a problem for policymakers wanting to create a new pull factor to boost tourism (Dann, 1981, Porter, 1995).

Relph (1976) asserts that when points of differentiation are transposed onto the physical landscape, these should be in embedded in local history and character. But in Great Yarmouth, casino planners and developers (public and private) had their hands tied by regulation. This suggests that casino regulation has created an socio-cultural regulatory by-product that will limit cultural regeneration agendas and impact on the extent of resort restructuring (Agarwal, 2002), and that the simple separation of the legal and social within the regulation element of the *Circuit of Culture* will need further work (du Gay *et al.*, 1997). Their thesis looked at the Sony Walkman as an artefact that created a new spatial practice perceived as self-inclusive

and unsociable. However, deeper research needs to be conducted into how cultural products that represent morally contested practices cut across legal and social regulatory fields.[41]

A further problem involving the integration of casino regulation into other policy areas can been seen in the time taken to adopt local casino policies before the start of licensing competitions, which has been the subject of much concern to all the local planners and developers. In particular, there was a fear of litigation from the casino industry if the competition processes could be challenged in court, which could be both embarrassing and costly.[42] This is an important point as local authorities could be held accountable on casino regulation in the future from an industry that has vast resources. The 16 local authorities involved in the licensing process have only been able to move as fast as their legal advisors, and the slowest member of the group, in adopting what they thought were watertight competitions. Therefore this unique style of a geographically fragmented and temporary development regime (Stone, 1989) had at its centre concerns about providing a legally sound regulatory environment, rather than an holistic view of conjoining licensing to regeneration. This added to uncertainty over finalising local development and area action plans required under the Planning and Compulsory Purchase Act 2004 (OPSI, 2004).

Integrating casino regulation with other policy areas has generated additional conflicts. In Scarborough and Torbay many interviewees contested casino development and gambling on social grounds, with some regional planners and most local community representatives feeling that locating casinos in deprived areas would put the poor, unemployed, low-income earners and adolescents at risk (Reith, 2003, Sternlieb and Hughes, 1983, Stokowski, 1996, Teske and Sur, 1991). du Gay *et al.* (1997) see social regulation as a strong force that has the power to dictate conduct and social order. In the case of Scarborough, casino development was demoted to a fine-print consultation item in a development plan because of social sensitivity. Although both locations offer traditional seafront games, it is evident that expansion of this contested practice would transpose new forms of symbolic meaning onto the physical landscape (Relph, 1976). In Great Yarmouth this process was welcomed by

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[41] This deeper analysis could also be applied to other morally contested spatial practices within the built environment such as the practices within red light districts that are seen by some as contested spaces of cultural consumption.

[42] It is reported that in March 2011 that the bidding process for the small casino licence in Scarborough has become litigious. One of the bidders is bringing a case against the local authority on the basis of unfair treatment in the bidding process (Yorkshire Coast Radio – Website, 2011). A council official from Scarborough Borough Council who was interviewed for this thesis in 2009 was contacted in March 2011 but refused to comment on this matter.

policymakers and seen as a strategy to regenerate place image, but it was evident from interviews that the town has a more dynamic cultural template and is looking for new ways to re-shape its visitor facilities.

Despite this evidence of an adaptive cultural dynamism in Great Yarmouth, with casinos seen as 'the next thing to take on' (Great Yarmouth: LAB1), a different attitude prevailed in Scarborough and Torbay. Many community representatives in these two locations seemed inflexible about changing the nature and character of place through casinos, which they perceived as socially negative. Either these representatives had influenced policymakers to moderate casino identities, or the conceivers of such spaces had recognised the potential for social conflict from casino expansion. Consequently, planners and policymakers have played down casino development in various policy documents, since these were subject to public consultation and had the potential to attract strong criticism. Such a defensive stance has implications for the rejuvenation of these resorts, which may be affected by a lack of policy commitment.

Importantly for this research, the various cultural meanings and beliefs attached to casinos have not been adequately addressed in economic, tourism and community policy. Even in the case of tourism, which is a cultural pursuit that should espouse local values, the subject has been glossed over. This is what Stokowski (2002) describes as valuable individual and community beliefs and meanings being embodied in the casino transaction. By not including casino development in all areas related to economic, tourism and community development, policymakers have exercised a different kind of power, where they have excluded perceived conflict issues from mainstream policy. Hence the part of the regeneration equation that encourages community engagement in local governance to progress social regeneration (Haughton and While, 1999) was sidelined.

In all three locations it was evident that the consultation process did not allow for a full debate on the social impacts of casino expansion. National and local policymakers thought that adequate protection measures were already in place through the gambling charity GamCare and the duty of care that regulation put on casino operators. However, as Rubenstein (1984) points out, experience shows that the negative impacts and costs of problem gambling need to be dealt with on a wider geographic scale. In addition, the

economic advantages of casino regeneration may be off-set by social problems caused by problem gambling (Teske and Sur, 1991). These potential social problems and their associated costs give cause for concern over the lack of attention to these issues at national level, and opens a debate about the methodology proposed by the DCMS for testing the social impact of casino regeneration (CAP, 2007b, DCMS, 2008a, DCMS, 2008b).

Many community representatives thought that the social impacts of casino regeneration had not been fully discussed and explored, noting limited debates at local and regional levels. If this social concern is not included in community policies, McMahon and Lloyd (2006) posit that casino development in areas inhabited by vulnerable groups will affect neighbourhood renewal strategies. But development also implies the improvement and updating of resort attractors and creating a path to stabilise economies and improve growth (Agarwal, 2002, Butler, 1980, Ritchie and Crouch, 2003). In the context of the three resorts this may provide the resources to address the social impacts of casino expansion. Hall Aitken's (2006) report on casino regeneration concluded that demands on public services might be mitigated if social infrastructure projects are included in casino regeneration plans. It is therefore surprising that links between social regeneration and resort reorganisation, and mechanisms for including the vulnerable and less well-off in regeneration plans, have not been fully explored. This might have gone some way to pre-empting social concerns among sectors of the community.

Social regulation should also be considered in the context of the social exclusion of certain groups of residents. It was clear to all that casino spaces would, through costs and dress and door policies, exclude the less well-off. This was particularly true of up-market Bond-esque casinos, which it was thought would attract better-off visitors (Dann, 1981, Agarwal, 2002). However, if all types were welcome in such places, this identity strategy may not work. Public and private conceivers of space will need to 'design in' casino identities that satisfy the imaging objectives of resorts, but unsuitable patrons who conflict with these objectives could deter high-spending visitors. In the case of Scarborough and Torbay these concerns have been understood in different ways and have affected how thoroughly casino regulation has been integrated into other local policy areas.

10.4 INTEGRATING COMMUNITY AND RESORT CULTURES INTO CASINO REGENERATION PLANS

It was evident in two out of the three case studies that casino regulation had not been well integrated into policy areas where its impacts would be felt and that community and resort cultures had not been taken into account. Such factors require understanding of the cultural issues attached to inserting new cultural reference points into communities with specific traditions, characters and values. The cultural regeneration policy analysis framework (Diagram 4, p43) allows a relationship to be made between social regulation and cultural values in the three resorts. It was noted in each case that there were community cultural values related to living in a resort that existed side-by-side with cultural and other values associated with visitors. There were also residual behaviours attached to the values of residents who are 'visitors' in their own town (Jafari, 1987). These factors make up a complex set of place-specific attributes (Lefebvre, 1974, Massey, 1994, Molotch *et al*., 2000, Ritchie and Crouch, 2003). In this context, integrating the symbol of a globalised spatial practice – casino gambling – in the form of a Type 3: Casino Mulitplex into a resort environment is part of the on-going dynamism of cultural change. However, external cultural references can influence personal experiences and meanings (Massey, 1994), and all the case studies revealed resistance to this cultural addition among community representatives. Once built, casinos will create new place realisations that either conform or conflict with the attitudes of residents and visitors (Jafari, 1987, Pearce, 2005). Cultural spatiality was explored in the literature (Randviir, 2002) as the way in which cultural practices are adopted as part of the tradition of a society, and subsequently become physically constructed. By using perceptions of how casino spaces should be represented and assigned identities, it can be surmised that in all three cases a form of cultural regulation has taken place. Most interviewees felt that the European Bond-esque identity would be the most appropriate choice for a casino based on their readings of each particular resort's history and character. This is a success indicator for public as well as private conceivers of space, since it avoids any conflict that may arise from global pressures and incompatibility with local culture (Dredge and Jenkins, 2003).

Interviewees divided their perceptions of the effects of casino regeneration into two areas. The first related to social regulation and concerns for vulnerable groups, the second related to legal regulation and casinos as economic regenerators. Notably, there were few objections

(by community representatives) to casinos on the grounds of changing family values. Most interviewees, including some community representatives, also perceived casino activities as sitting comfortably with each resort's particular visitor culture so long as patrons were responsible in their behaviour, demeanour and appearance. On the other hand, most community representatives in Scarborough and Torbay perceived a conflict between casinos and community values, particularly in relation to vulnerable groups. For example, new casinos would alter the cultural spatiality of the resort to one that condoned this cultural practice, which in turn would produce a shift of cultural attitudes, values and meanings among both locals and visitors. This would cause some to contest the new cultural realities represented by casinos.

In the case of Great Yarmouth there was evidence of a culture that strived to create innovative attractions influenced by its status as an international port. Most interviewees saw the cultural template as fluid and adaptable, indicating the cultural influences that have taken place over centuries. The same phenomenon was much less apparent in Scarborough and Torquay. Instead, the conception of new casino spaces is grounded in references to the 'grander days' of these resorts as places for the consumption of up-market facilities. Whilst this is associated with their history and character as places, it seems there was also a cultural regulatory environment that moderated values and traditions, in the way discussed by du Gay *et al.* (1997).

It is therefore not enough to treat casino regulation as just a legal, social and moral issue. As evidenced by the cases studies, cultural regulation should also be taken into account, and involves the question of how top-down cultural regeneration policies affect the heritage and traditions of resorts. This would result in more informed, evidence-based policymaking, which combined the values and symbols of the past with aspirations to reinforce a sense of place.

One interviewee from Great Yarmouth thought that combining symbols of the town's maritime history with a casino would complement the resort's community culture and heritage sites (Great Yarmouth: HIS2). Understanding local culture and history is especially important in view of the fact that casinos will create new cultural reference points and realisations of place (Newman and Paasi, 1998, Massey, 1994, Relph, 1976). How these new

realisations fit with a resort's history and traditions should be further explored to determine the economic and cultural interface of the casino regeneration strategy. Furthermore, inserting new or expanding existing conceived spaces (Randviir, 2002) that are perceived will alter place specific cultures, needs to explore the impacts of intended new internal and external reference points. Especially those physical insertions that house contested spatial practices.

Limiting consultations, stifling debate, burying casino development in large development documents and failing to integrate casino development into other policy areas has worked against compatible product reorganisation and its impacts. This is problematic and may reinforce social conflict and result in serious social as well as cultural consequences for communities. In the cases explored for this thesis, exploration of local culture has not been embraced, as the imperative for economic regeneration based on casino development has outweighed social and cultural considerations and been ignored by policies that could encompass these issues.

10.5   A VISION FOR RESORT CASINOS

With the aid of Schmid *et al.* (2008), Lefebvre (1974) provides an understanding of the dialectic required to fully understand spatial production. It is posited that the dialectic between the semiotic and phenomenological is about creating a logical discussion of the differences between the actions and behaviour of society as a whole and individual social behaviour. In terms of the topic of this thesis, this means looking at, for example, the difference between local residents who accept the building of a casino at a seaside resort, and those who oppose it. But Schmid *et al.* (2008) extend the dialectic to a triadic, in order to supplement Lefebvre and create a richer analysis. Schmid *et al.* (2008) recommend that analysis should be supplemented by an interpretation of creative symbols, in this case the casino as a symbol representing a contested practice but which is also affected by transgressive or deviant activities associated with seaside resorts (Rojek, 1999, Sternlieb and Hughes,1983).

It is evident that the terms in which casino regeneration was discussed in regional and local policies differed amongst various sectors, but there were also commonalities. National policy suggests that casinos should be conceived as entertainment complexes to maximise

regeneration benefits (DCMS, 2004), but as Jameson (1998) points out, regeneration strategies should take account of the culture of society. This point was addressed in terms of the wider acceptance of gambling in the Gambling Review Report in 2001 (DCMS, 2001), but was not discussed in terms of its cultural impact on specific locations. It may be that in recommending a Type 3: Casino Multiplex as providing a mix of gambling and non-gambling activities, the DCMS thought this would provide a veil (Lynch, 1998) for a contested social practice. In effect, the department was using national policy to promote greater cultural acceptance of casino regeneration. Though national policy referred to regional and large casinos (Great Yarmouth), planners and developers in small casino jurisdictions (Scarborough and Torbay) have followed the same format. One reason for this was that a Type 3: Casino Multiplex would offer greater regeneration benefits in terms of jobs, investment and revenues. Another that may be deduced from the data is that cloaking the identities of casinos might limit social and moral antipathy to casino regeneration.

However, contestation has to do with the implementation of the Gambling Act 2005 and the effects of regulation on seaside resorts. The word *casino* held varying meanings to interviewees and was used in different ways in policy documents. In national policy and legislation it refers to a Type 3: Casino Multiplex, which provides a variety of entertainment activities. This interpretation plays down moral arguments against gambling and has avoided triggering debates around location-specific cultural meanings and identities, since general moral opinion favours this type (Archbishop of Canterbury, 2007, Basham and Luik, 2011, Collins, 2003, Eadington, 1996, 1998, Randviir, 2002, Jameson, 1998, Massey, 1994).

At regional and local levels, the majority of interviewees had little moral objection to the word *casino*, but understood it as implying private ownership of most of the benefits and risks of gambling. For community representatives, it meant the government was following a neo-liberal agenda (McGuigan, 2005) and had shifted the responsibility and duty of care for the social impacts of the activity on to the private and voluntary sectors, whilst accruing functional benefits in terms of tax revenues and economic multiplier effects (CAP, 2007, Gambling Commission, 2008, OPSI, 2006). In regeneration terms, clearly the economic emphasis is uppermost. However, the emphasis on casino developers and the voluntary and community sector to look after problem gamblers if the private sector fails in its responsibilities is further evidence that this regeneration strategy does not fully address all the

issues and debates. This lack of debate was clearly recognised by some interviewees, who felt short-changed, particularly since previous regeneration planning had made greater use of community engagement.

At national level the word *casino* also implied a geographic monopoly (Collins, 2003), and was associated with inward investment, job creation and economic development (CAP, 2007, Lee, 2006) as well as with renewed leisure opportunities. In all three cases, in terms of the designed form, most people envisaged either a traditional or modern version of the European Bond-esque model, which would provide a new up-market attractor and reverse the cycle of decline (Ritchie and Crouch, 2003, Agarwal, 2002). But while a new attraction may convey a different meaning, it could also alienate current visitors and exclude deprived and vulnerable groups. At the same time, this model was seen as protecting planners and developers from the negative social impacts of gambling. This was evidence of Bourdieu's (1977) contention that power structures create place identities to reinforce those structures, without fully understanding the social and cultural consequences of their actions.

Furthermore, exclusion may affect the individual identities of people within the various excluded groups and alter their perceptions of place. For example, poorer residents may feel uncomfortable about entering an up-market casino, which may in turn alter their behaviour and the way they feel about where they live. Some community representatives thought that a new casino could become the focus of anti-social behaviour and therefore restrict overall consumption suggested it.

For some interviewees, the word *casino* symbolised physical enhancement that would project a positive image to tourists, and many also saw it as widening the night-time appeal of the resorts' primary tourist areas. There was also opinions that it should be an entertainments complex with the casino itself cloaked by other activities, as discussed earlier.

Policymakers and business representatives in Scarborough and Torbay reiterated that a casino should be up-market enough to attract a higher-spending visitor and create a different sense of place (Agarwal, 2002), but that it should also be rooted in local character and heritage to complement what already existed. Although private developers might not understand the specific characteristics of place, these concerns could be allayed provided new developments

were not brash or inappropriate. Some interviewees thought that considering local uniqueness and the resort's history and culture would ensure compatibility between the resort and an up-market casino identity.

There were other interpretations of the meaning of the word *casino*. One comment – 'I think you take a casino perhaps with a loaded gun at your head on the basis that you're done for as a town' (Scarborough: COM3) – indicated that the town was desperate for any type of new attraction and had taken a very different strategic approach to regional planning (Scarborough: R1). In Great Yarmouth, on the other hand, community representatives perceived a conflict between recent cultural regeneration projects in respect of its maritime heritage and gambling activity, and in Scarborough a planner thought a casino would create conflict with the town's successful art-based cultural regeneration strategy. These comments illustrate that cultural considerations need to be taken into account. Due to its scale and appearance, a Type 3: Casino Multiplex would alter a resort's general sense of place (Randviir, 2002) and cultural experience. Evidence for this was provided by Stokowski (1996) who reported that culturally unsympathetic casino development in Colorado mining towns had created conflicting experiences for locals and visitors.

Maintaining distinctiveness of place will, then, depend on the extent to which a casino complex conforms to local heritage, as understood by residents (Molotch *et al*., 2000). At the same time cultural discourses surrounding the ethics of casino gambling (Rojek, 1999) may go some way to allowing it to become an acceptable part of resort activities (Agnew, 1993, Newman and Paasi, 1998). However, members of a resort community may also occasionally display anti-social behaviour if they feel excluded from local facilities (Agarwal, 2002, 2006).

These issues are not regulated in cultural development policy. Developers who decide the design and identity of a casino may not consider them either since they may be unsympathetic to local cultural nuances. In addition, since the primary aim of investment will be to produce an economic return, it is likely to be the socio-economic aspects of development that developers and operators prioritise.

Also important is the way in which any new resort product is packaged and sold, since this will frame the way it is consumed by visitors and residents (Agarwal, 2002, Hannigan, 1998).

This needs to include the character and traditions of resort communities as well as their aspirations for the future, and take account of how both residents and visitors perceive resort culture (Agarwal, 2002, Goonewardena *et al*., 2008, Stokowski, 2002). There should be compatibility between revitalised resort cultures to complement the heritage of those resorts and their communities. Any new physical addition needs to create a positive sense of place for residents and visitors by providing a symbolic meaning that has a distinctive relational link to the history and character of each resort (Molotch *et al*., 2000) to provide a distinct sense of place that acts as an attractor for visitors and residents alike. Attention should be paid to the process of social construction by both visitor and resident through their particular cultural lenses, which may will overlap and diverge between these groups at specific moments in time (Lefebvre, 1974, Shaw and Williams, 2004). Planning for casino development will therefore depend on casino-culture impact studies to understand the complexities of the various data involved.

10.6   VISIONS OF REGENERATION

As with *casino*, the word *regeneration* conjured up conflicting meanings. To some, regeneration meant partnership between the public, private and voluntary sectors in general terms. But linking casinos to regeneration was also seen by many – especially those involved in community and voluntary work – as socially problematic, and as reversing various successful social regeneration interventions already carried out. The Labour Party's regeneration agenda encompassed the economy, society and place (Richie and Crouch, 2003), but many interviewees thought that the economic benefits of casino regeneration were not being balanced with the potential social impacts (Reith, 2003, Sternlieb and Hughes, 1983, Stokowski, 1996, Teske and Sur, 1991). Furthermore, there was little evidence that place was being considered at all, due to the strictures in regulation and spatial policy on site selection and land use.

McMahon and Lloyd (2006) believe that it may not be appropriate to place casino developments in neighbourhoods and communities that are already vulnerable. Evidence from the case studies illustrated concerns about problem gambling and increases in family break-ups, crime, drugs and alcohol abuse (Reith, 2003), 'like Chicago or Las Vegas' (Torbay: COM2). Other concerns pointed out by Gonzales (2003), Smith (2004) and Stokowski (1996) include rising property values, leading to residential and business

displacement, unemployment and an increase in anti-social behaviour and social exclusion (Hall Aitken, 2006, Lee, 2006).

To policymakers and business representatives, casino regeneration meant the revitalisation of the tourist economy through improved and expanded cultural facilities (Type 3: Casino Multiplex) to create a 'stylish and glamorous built environment' that would attract higher spending visitors (GYBC, 2006b, SBC, 2006c, Torbay Council, 2006b, 2007b, p27). In all three cases it also meant rejuvenating the evening economy and stretching out the tourist season. However, these arguments have underplayed the seasonal aspect of resort decline and restructuring, as discussed by Agarwal (2002).

The casino development process has created conflicts over the facilities and images wanted by traditional markets. New Labour's ideology for regeneration has aimed to take account of local culture and the specificities of place, based on community engagement and the expectations of existing markets (Hill and Hupe, 2002). However, as Evans (2003) points out, there have also been top-down interpretations of place that have caused dissonance. This was evident from some of the local and regional perceptions of casinos and the way interventions have been interpreted by the private sector, which concurs with McGuigan's (2005) observation about the dangers of leaving the market to make economic judgements that impact on place. Although tourism is vital to these economies, most interviewees felt that the regeneration benefits of casino development had not been considered in the context of local cultural values and traditions. Rather, regulation saw casinos as primarily an economic driver (Etches, 2011) with leisure provision as a secondary function.

As discussed earlier, in all three cases many community representatives and some policymakers thought over-capacity in casino provision was a problem, and that scrapping the demand test could lead to over-capacity in other areas, such as accommodation (particularly in Great Yarmouth and Torbay) and 'games of chance' facilities currently oriented towards the family market. These facilities are unlikely to suit the visitor seeking a Bond-esque casino experience, and to attract this market policymakers will need adjust resort capacity as a whole rather than single aspects (Butler, 1980) and invest significantly in up-market hotel accommodation and other services (Agarwal, 2002). However, in Great Yarmouth and Torbay, spatial reorganisation and the transformation of visitor to residential

accommodation is being implemented to reflect declining demand patterns (Agarwal, 2002, GYBC, 2011, Torbay Council, 2010g, 2010h). Dilapidation, under-investment and decreased demand for traditional family holidays have contributed to shrinkage in all levels of accommodation, including those previously serving up-market visitors.

The reorientation of accommodation and other facilities based on resorts' grand histories, traditions and physical symbols could help restructure Scarborough and Torbay's tourism product. However, policymakers, business and community representatives all felt that this would impact on the local community in terms of labour and spatial reorganisation (job loss, job skills needed to be re-employed, businesses displaced and start-ups), and that these issues had not been included in debate. When combined with the lack of research undertaken by local authorities on casino demand (notably in Scarborough and Torbay), this creates a picture of uncertainty as to how capacity should be planned for to aid in an over-arching regeneration plan (Tewdwr-Jones, 2004). In line with neo-liberal thinking, regional authorities have relied on the principle of economic success through supporting free market choice (to produce and consume cultural products) alongside minimal regulation (McGuigan, 2005), a pattern that supports Smith's (2004) observation that regional authorities will show greater commitment to supporting larger resorts due to larger economic returns. In terms of dealing with a contested spatial practice, regional authorities have therefore relied on economic debates (Reith, 2003) and treated the concerns of community representatives as secondary. But is the economic debate sound? Only one local authority (Great Yarmouth) has commissioned research to establish whether there is demand for increased casino capacity. Without a clear idea of demand, adjusting the tourism supply chain will be problematic and could seriously affect the regeneration and restructuring equation (Agarwal, 2002) in terms of image and its impact on resort transformation.

Hence the complexity of managing tourist capacity (Butler, 1980) complicates the regeneration debate. Regional interviewees as well as community representatives and business people had little or no idea of the scale of gambling provision that had been conceived at national level, and agreed that current casinos were not fully utilised. Furthermore, increasing capacity in one particular visitor area is not recommend by academics. Nel and Binns (2002) and Smith (2004) posit that development should meet current demand, but there is no evidence for this in Scarborough and Torbay. As Smith (2004)

also points out, this may also create business displacement and property voids, thereby negating the proposed positive effects of a casino (Agarwal, 2002, Ritchie and Crouch, 2003).

More generally, cultural considerations in regeneration planning need to be subjected to greater analysis, as these factors shape the coalitions that form around large regeneration projects. In Scarborough and Great Yarmouth collaboration on casino development was not well managed. Casino-centric informal temporary development coalitions (Holman, 2007) were in place for two casino projects (Opera House Casino in Scarborough and The Edge in Great Yarmouth), but these disappeared due to rigorous casino regulations. In Scarborough, on the other hand, a comprehensive bottom-up development coalition has delivered numerous regeneration projects. Although this type of coalition has been less evident in Great Yarmouth or Torbay, there is evidence of attempts to read the sensitivities of place and take account of residents' opinions. This is important as a large percentage of the population in these resorts are employed in the tourism sector and there needs to be common understanding of what it means to create a physical embodiment of a contested activity to create the right environment for visitors (Macbeth *et al*., 2004, Newman and Paasi, 1998). Since people derive different realisations in pursuit of varying social practices based on the variety of meanings and experiences attached to a place-setting and from external experience references with each group constructing their own sense of place (Newman and Paasi, 1998) it is important that the population feel included in the casino regeneration process. However, including residents in the regeneration process could also mean involving them in jobs and ancillary casino services as well as participating in casino facilities. Inclusivity in the entire process of casino development and management will encourage local people to commit to the casino regeneration strategy.

By contrast, conflict will have a knock-on effect on hospitality (Macbeth *et al.*, 2004), and public and private agencies involved in casino development should therefore make an effort to create positive narratives. For example, incorporating a maritime (as suggested for Great Yarmouth) or arts-based (Scarborough) identity to casinos (Molotch *et al.*, 2000) would go some way in creating the positive image of place that resident could 'buy' into.

It is clear from the data collected that cultural considerations have not been incorporated into casino planning, and that local policymakers in all three case studies have embraced casino

development primarily as a economic strategy. Due to the contested nature of gambling, regional policymakers in Scarborough and Torbay perceived a pitfall in adopting a regeneration catalyst based on a contested activity with proven social consequences. This may account for the fact that regional planners have dealt with casino regeneration at arm's length. Conflicted understandings of *casino* and *regeneration* have therefore underpinned the economic focus of the Gambling Act 2005, and caused the latent cultural effects of casino development to be discounted.

10.7   CASINO REGULATION AND CULTURAL REGENERATION POLICY

At this point it is important for the author to reflect on the results of the discussion. Through the various narratives covering resort regeneration and casino development, this chapter has helped to clarify how casino regeneration policy interacts with other policy areas, and how policies interact with the cultures of resorts (Agnew, 1993, Newman and Paasi, 1998). This has made clear that casino regeneration policy has failed to take account of the cultural meanings, values and traditions of seaside towns and that the requirement for policy to take account of cultural symbols is lacking within casino regulation at all levels. Table 20: Resort restructuring through casino regeneration (p221) developed from Table 2 (p40) provides a illustration to what has been discussed in this respect and illustrates how the resort restructuring framework (Agarwal, 2002) can be used to address the challenges of casino development.

From the review of UK regeneration practice in Chapter 2, it was predictable that there would be differences of views between policymakers. In particular, national, regional and local conceptions of casinos tended to focus on the economic merits of cultural regeneration, while ignoring place meanings. However, most interviewees expressed a different view. While regional planners were concerned about a lack of policy integration, local opposition politicians and community representatives saw this regeneration process as socially flawed.

When looking at these different perceptions, the cultural regeneration policy analysis framework proved useful for analysing how cultural regeneration based on a contested practice affects cultural settings, allowing the focus to shift from cultural regeneration to increased consumption and to explore regeneration in a wider sense. Further research of this

policy area at all levels could enable casino regeneration to take account of local circumstances and reactions.

Table 20: Resort restructuring through casino regeneration

Restructuring Element	Place Attribute	Spatial Impact Challenges	Policy Challenges*
Product Reorganisation	Heritage	Specific casino identities that symbolise a complementarity with resort histories.	National policy (DCMS) to propose guidance on cultural impact study of casino development. Local cultural impact studies to be carried out to inform economic, tourism, community and regeneration policy. Impact studies used to inform Local development partnerships on integrating casino development into spatial, economic and tourism planning. Extend the national 'best test of social impact' review to include results from local cultural impact studies, and used to inform further casino policy guidance and integration with economic, tourism, community and regeneration policy.
	Traditions & Values	Casinos compliment the traditions of the case study resorts.	
	Physical Setting	Representations that are cloaked as entertainments complexes will extend the resorts function as a place where fun is consumed.	
	Functionality	Type 3 Casino Multiplex that offers additional new facilities for visitors and residents.	
	Distinctiveness	Distinctive identity that designs in exclusivity and designs out vulnerable at risk groups.	
Labour Reorganisation	Heritage	Traditional skills of current workforce do not suit casinos and operating times.	Review of direct and indirect jobs created as a result of casino development. Skills audit of casino employees required and weaknesses in local skills pool. Determine levels of skills importation.
	Traditions & Values	New skills required over and above traditional skills available.	
	Functionality	Adaptation/training required to reorganise the skills base. Risk of importation of skills.	
Spatial Relocation	Heritage	Casino placed within primary tourism area. Re-images and up-grades the image of the resort super structure.	Cultural impact studies to consider impacts on new place realisation of casino insertion into primary and/or secondary tourism areas. Displacement review on current gambling, adult arcades and related facilities through increasing casino capacities. Local development partnership site selection strategy to be informed by cultural impact studies. Casino developer agenda fit.
	Physical Setting	Concentration of development within primary tourism area. Increases visibility of the tourism superstructure. Contributes to re-imaging of primary tourism area.	
Place Transformation	Heritage	Type 3: Casino Multiplex as a signifier of 'fun' that is derived from existing resort activities that are complimentary e.g. adult arcades and games of chance.	Local authorities to consider results of cultural impacts studies and use to inform new casino policies in new jurisdictions. Brief future casino developers on cultural impact studies and provide regulation framework for local acceptability of place specific casino representations and identities.
	Traditions & Values	An extension of the resort traditions, which to some includes casino gambling as a transgressive behavior.	
	Physical Setting	Large complex that highlights the primary tourism area and its function as a place to consume more than gambling.	
	Functionality	The resort offer is significantly re-imaged and appeals to a wider audience, stretching out the tourism season.	
	Distinctiveness	Distinctive identities reiterate resort character and history.	
	Image	Positive perception of a large new cultural reference point that catalyses further investment into a resort.	

*The spatial and policy challenges listed will help to inform the government's next wave of casino developments.

10.8   CULTURAL POLICY AND PLACE-SPECIFIC CULTURES

The approach to cultural regeneration policy analysis used in Chapter 3 (Diagram 4, p43) was taken further to explore whether casino development has taken account of the cultural values and traditions of seaside resorts. It is now clear that it has not. This highlights a gap in the way regeneration planning through a contested activity has been dealt with by policymakers. In practice, the way in which casinos will be conceived has been left to operators and developers. Although local and regional planers have the authority to moderate planning applications, the licensing process dictates the final representation and identity of casinos and therefore also their impact on local cultural templates.

Producing casinos creates new meanings and perceptions of place for both locals and visitors, and can result in conflicts that thwart restructuring efforts. This may particularly be true in places that do not readily adapt to outside cultural influences. From the case studies, it is apparent that the European Bond-esque casino is still strongly favoured in all three resorts, though there was also a perception that adding in entertainment facilities might have the effect of cloaking a contested activity under more acceptable forms of leisure. Furthermore, the question of whether casino development will be complementary to the character, traditions and history of the immediate area is also problematic, particularly given the economic focus of development coalitions. Casino identities created by developers, if not moderated culturally, may draw the wrong type of visitor and eventually damage the image of resorts struggling with long-term decline.

Other consumption issues include the expansion of gambling capacity, which will be vital in creating a strategy to combat decline. There was a general misunderstanding in all three cases on how much to increase gambling capacity, as demand has not been determined. At the same time, casinos that are perceived not to complement a particular resort may affect take-up, as well as other capacities such as accommodation, which in turn might damage resort image and thwart restructuring strategies.

Underlying all these issues is the fact that, as a mixed legislative tool, casino regeneration policy lacks robust guidance on all aspects of casino expansion, but especially on cultural issues, as it is here that conflicts are most likely to occur.

10.9   CASINO REGENERATION POLICY RESEARCH

Research findings point to the fact that it is important to take account of the historic meanings, values and traditions of resorts when inserting a significant new cultural symbol that condones a contested practice. As many interviewees found the casino strategy ideologically unsound and lacking in evidence, this may explain some of the resistance demonstrated. This issue has formed the main thrust of the research, which has examined restructuring proposals closely to gauge any dissonance among resort communities and potential consumers (Ashworth and Hartman, 2005, Gottdeiner, 1993). Research of this nature would expect to find distinct groups with their own particular political, economic and social interests and interpretations of place (Massey, 1994). However, these interpretations need to be mapped so policymakers can look for commonalities to find the most complementary way of inserting new resort structures that are associated with a contested spatial practice.

From these observations it can be seen that the cultural regeneration policy analysis framework (Diagram 4, p43) was able to provide data that has implications for the success of casinos. The method used to compile the relevant data has been successful in uncovering the various perceptions of the cultural effects of casino development in case-study resorts. Furthermore, the case-study approach itself has been successful in exploring this new style of regeneration, though it is clear that more research in this area needs to be carried out. However, the theoretical framework used utilised Lefebvre's (1974) elements of perceived and conceived space, alongside the du Gay *et al.* (1997) elements of regulation and producing casino representations and identities. For the framework to be a complete analysis instrument in terms of Lefebvre's and du Gay *et al.* (1997) theories, casinos have to be built and populated. Only then can lived experiences (Lefebvre, 1974) and consumption (du Gay *et al.*, 1997) be explored and those outcomes looked at in the context of a whole analysis framework, which will produce a rigorous research tool for future cultural regeneration projects.

What needs to be addressed is the demand for expanding gambling provision. It has been noted that the government excluded the once-important demand test for casinos in the new legislation. As casino activity will be felt further afield than the local authority licensing that activity, this demand needs to be better understood and will be essential for restructuring

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resort capacities. Here the extended analysis framework would take account of 'lived space' and how they are consumed in term of the experience and demand. This would reveal the meanings of these spaces and whether further expansion is viable in terms of resort cultures and their economies.

Added to this, robust research is required on how the specific characteristics and traditions of resorts relate to new attractions developed as part of restructuring programmes. Mapping resort cultures and their potential to adapt is important in respect of creating activities that will be complementary to the resort. It has been noted that the new casinos may be on a scale that dwarfs many existing attractions, and in some cases significant landmark buildings may be converted to casino use. Therefore using the full analysis instrument will be able to provide an informative cultural impact tool.

This should be looked at in terms of the changes these developments bring to local cultural templates, and the new realisations of place specific cultural references they will be create. Understanding these changes may prove vital for successfully resort transformation, as well as their product reorganisation and image enhancement through casino regeneration.

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Appendix 1: Interview Topic Guide 1.

1. Have you participated in regeneration policy and what was your role? Prompts: • Direct input (decision maker) or indirect input • Does this include LED • How does a casino fit into this policy
2. National: Did you participate in the first government consultation on the draft Gambling bill? Regional & Local: Did you participate in consultations on the Casino Policy and what was you role? Prompts: • Decision maker? Were you happy with: • Where it was held/The way it was held e.g. online • The focus of the exercise • The information you were provided with • Who was running it?
3. Have you participated in any other regeneration consultations at any stage? Prompts: Were you happy with: • Where it was held/The way it was held e.g. online • The focus of the exercise • The information you were provided with • Who was running it?
4. Is a casino still a valid regeneration tool in the current economic climate?
5. What reactions have you had from businesses as regards governance from the consultations? Prompts: • Tourism businesses in particular • Business generally
6. How have these reactions affected policy?
7. What processes within your organisation have taken place from the initial consultation to where we are now? Prompts: • Between government and business • Between government and the voluntary sector
8. Has media reaction to the casino affected policy or the planning process?
9. National: What do you think is unique about UK resorts? Regional & Local: What do you consider is unique about this seaside resort?
10. Regional & Local: What tourism facilities are particular to this resort?
11. How should a casino fit into the resort landscape?
12. Have a look at this table of the types of casinos. What kind of casino is best suited to this resort?
13. What will this kind of casino do for regeneration of the resort?
14. Will the casino add to or alter the character and traditions at the resort?

Appendix 2: Interview Topic Guide 2.

1. Have you participated in regeneration policy and what was your role? Prompts: • Direct input (decision maker) or indirect input • Does this include LED • How does a casino fit into this policy
2. National: Did you participate in the first government consultation on the draft Gambling bill? Regional & Local: Have you participated in consultations on the Casino Policy and what was you role? Prompts: • Decision maker? Were you happy with: • Where it was held/The way it was held e.g. online • The focus of the exercise • The information you were provided with • Who was running it? • Group conflicts
3. How different is the casino regeneration strategy from other regeneration strategies? Prompts: ● Tensions between differing regen strategies: ● Legislation (vulnerability of young and deprived) ● DCMS/CAP remit (casinos in areas requiring regen) ● Regional casino research for Leeds/Sheffield but not Scarborough
4. What reactions have you had from businesses/voluntary orgs as regards organisation of the consultations? Prompts: • Tourism businesses in particular • Business generally • Voluntary organisations
5. Do you think that these reactions affected policy making ?
6. What processes within your organisation/dept. have taken place from the initial consultation to where we are now? Prompts: • Between government and business • Between government and the voluntary sector
7. National: What do you think is unique about UK resorts? Regional & Local: What do you consider is unique about this seaside resort?
8. Regional & Local: What tourism facilities are particular to this resort?
9. How should a casino fit into the resort landscape? Prompt: RSS and town centre development
10. Have a look at this typology of casinos. What kind of casino is best suited to this resort?
11. What will this kind of casino do for regeneration of the resort?
12. Will the casino add to or alter the character and traditions at the resort?

Appendix 3: Typology of Casinos.

It may be useful to examine the various types of land based casinos that exist in general so the differing descriptions and names that are used by actors – and in legislation – can be more easily understood. Understanding the language used by various interviewees whose narratives on casino policy are reported in this thesis are vital to an analysis of policy and the how's and why's behind their perceptions on casinos. The meaning of the word *'casino'* is relative to the culture in which this popular artefact is situated. The word can conjure many images for those that hear it. To some it can describe outward appearance, function, structure, scale or moral question. The casino form can house various functions and is represented in many ways around the world in both urban and rural environments. Casino identities can vary. The predominately European image, which from the outside veils the gambling activity through signage restrictions or its inclusion in a hotel, and is created as something akin to an opera house or theatre has been used in the past (Kingma, 2008, Lynch, 1998). The interiors of such places normally reflect an up-market or grand image that many are familiar with from James Bond films. This identity is referred to as the Bondesque image in this thesis.

The other common identity that is more prevalent today is termed the Las Vegas image. These are places where signage is bold. Themes are used to convey a particular outward appearance of the built structure that is used to create an identity that cries out 'consume me'. Interiors may vary from basic themed fixtures to more up-market fixtures that create differing internal identities based on the exterior image. The outward appearance is about using various techniques such as neon and other lighting effects, sculpture and other built forms to promote attraction. It is design used to persuade (Venturi, *et al.*, 1977). Casinos are described and their identities perceived in many ways by individuals. In order to gain a better understanding and clarity on these differing perceptions various casino operations around the world were looked at. Through a comparative analysis of basic form and function, a typology for casinos was arrived at in terms of how these spaces are represented and identified. This process was also informed by the work of Eadington (1995) on casino structures in which he provided analogies according to spatial configurations:

- Casino operations housed in historic or refurbished structures;
- Riverboat casinos;

- Casino operations which include limited non-gambling activities housed in purpose build facilities;
- Casino operations that include extensive non-gambling activities, housed in and around purpose build facilities (Eadington, 1995).

Type 1: Standalone Casino

This is the traditional stand-alone casino operation that is seen around the world in various urban and rural landscapes. This is the most common type of casino operation found in urban areas in Britain and Europe. Architectural forms differ from modern purpose built structures to refurbished or historic ones. In some cases office blocks can house an operation on the first floor where it is almost invisible at part of the street-scape. Some purpose built structures are used to represent the gambling activity as elegant and wealthy like the Grand Casino in Monte Carlo. Scale and size vary, as does the representation of gaming depending on particular cultural values. Whilst the gaming offer varies by culture, it is apparent that this asset type is strictly a gaming venue only with a limited provision of catering as part of the service package.

Type 2: Casino Hotel

Originally built in rural areas to attract tourism this is the most common type of casino operation found around the globe. Usually found to be graded as four star properties and above. Firmly established in visitor resorts and urban tourism destinations, hotel casinos can vary in their built forms. Some are purpose built or have been housed in refurbished historic or other properties. Some accentuate the casino operation that can be found in a prominent position on the ground floor or front of the hotel. Here the casino operation is seen as paramount to the business model itself. In other examples, gambling operations are housed on other floors of the hotel and offered as part of the hotels services to extend a greater package of night-time entertainment. Traditional turn of the century grand hotels in urban areas, rural retreat hotels, modern and futuristic structures in coastal resorts such as Macao offer casinos that are represented in much the same way as the stand alone casino with an additional accommodation element. Alongside the gaming activities the hotels offer all the services that one would expect of a premium hotel property such as hairdressers, gym and other premium hotel facilities.

Type 3: Casino Multiplex

The similarities of this kind of operation and the casino-hotel are to do with scale and size as well as function. Locations are very similar. Building types vary in much the same way but these operations are usually larger multi-faceted operations offering many more non-gambling indoor activities than their smaller counterparts. This type can also include many outdoor leisure pursuits as part of the resort package. The cultural representation of this operation is grounded in the variety of day and night time activities with the inclusion and in some cases an accent on the casino operation depending on the acceptance of gaming within a particular culture. A particular built structure is not common to this category. The structure is usually purpose built. It is the operational aspects of gambling alongside other family and adult entertainment opportunities that dictates its typology alongside the inclusion of in some cases outdoor aspects offered as part of the service package.

Type 4: Integrated Casino Megaplex

The megaplex is an integrated myriad of the other asset types but includes other leisure operations but not limited to bars, restaurants, night clubs, theatres, bowling alleys and other family or adult entertainments within a prescribed visitor boundary. It is integrated by the roads and pavements and public transport systems. The casino-scape is permeable through choices of movement in and out of either a high street 'main-vein' such as the 'Las Vegas Strip' or by blocks that form an easily identifiable colourful district or casino-scape as is the case of the 'Cotai Strip'. The representation of the gaming activity is not muted but symbolised through a multitude of powerful signifiers of wealth which includes such words as "win, jackpot and gold" to name a few. By day large animated signs deliver the gaming messages that are reinforced by a sea of neon in the night. However, these cultural superstructures vary in size from the mammoth Las Vegas to the smaller Century City in Colorado. The commonality being that the local physical and economic infrastructure lends itself to the consumption of the gaming activity, and alongside this in some cases like Las Vegas, non-gambling entertainments are included.

Type 5: Racino

This combines live horse racing with the added attraction of table and other gaming facilities. These are usually small gaming operations that are offered as an activity between each scheduled live races. Catering is usually provided as part of the service package.

It is clear from the typology offered here that the regional, large and small casinos considered by the department of culture would fall within a smaller spectrum of casinos assets that does not include the Casino Megaplex or Racino. A guide is provided below for ease of reference.

Typology of Land Based Casino Operations.

ACTIVITY ASSET	GAMING	BARS AND RESTAURANTS	ACCOMODATION	LIVE/RECORDED ENTERTAINMENT	INDOOR LEISURE	OUTDOOR LEISURE
CASINO	Y	Y	N	N	N	N
CASINO HOTEL	Y	Y	Y	Y	Y	N
CASINO RESORT MULTIPLEX	Y	Y	Y	Y	Y	Y
INTEGRATED CASINO MEGAPLEX	Y	Y	Y	Y	Y	Y
RACINO	Y	Y	N	N	N	Y

Appendix 4: Interviewees.

Interviewees: National case study

National:
Ellwood, T. Shadow Minister for Gambling & Conservative MP for Bournemouth East.	CON1
Collins, P. Professor Gambling Studies, University of Salford.	EX1
Boon, A. Gambling Sector Team, DCMS	DCMS1
Pillay, D. Senior Policy Advisor, Tourism, DCMS	DCMS2

Interviewees: Scarborough case study

Regional:
Murfin, R. Planning Policy Manager, Government Offices Yorkshire and Humber	R1
Shepherd, J. Senior Urban Renaissance Manager, Yorkshire Forward	R2
Barker, A. Tourism Policy Manager, Yorkshire Forward	R3
French, J. Manager, York and North Yorkshire Partnership Unit	SR1

Local:
Grunwell, R. Respected town lawyer and ex Chair LSP	BIZ1
North, G. Chairman, Scarborough Tourism Forum	BIZ2
Frank, R. Owner, the highest graded (4 Star) hotel in Scarborough	BIZ3
Sturrock, S. Chief Executive, Scarborough District Council for Voluntary Services & Member LSP	COM1
Parkins, Rev, G. Scarborough Christian Centre and Member LSP	COM2
Hart, N. Member Town Team, Urban Space Group	COM3
Jefferson, J. Independent Councillor, Scarborough Borough Council	IND1
O'Flynn, B. Liberal Democrat Councillor, Scarborough Borough Council	LD1
Archer, A. Strategic Director, Scarborough Borough Council	LPM1
Elliott, P. Head of Regeneration and Planning, Scarborough Borough Council	LPM2

Interviewees: Great Yarmouth case study

Regional:
Read, M. Coastal Policy, GOEE	R1
Long, B. Cultural Planning, GOEE	R2
Sabberton, N. DCMS, GOEE	R3
Williamson, J. GOEE	R4
Bennett, G. EEDA	R5

Local:
Newman, J. Town Centre Manager	BIZ1
Jones, A. Pleasure Beach Operator	BIZ2
Blank, M. Community Leader	COM1
Hewitt, M. Community Worker	COM2
Paine, Rev, P. Port Chaplin	COM3
Plant, G. Conservative Councillor Economic Development, GYBC	CON1
Tooke, C. Local Historian	HIS1
Gooch, M. History Society	HIS2
Williamson, B. Labour Councillor Licensing Committee, GYBC	LAB1
Howard, T. Head of Regeneration GYBC	LPM1
Wright, P. Regeneration Team, GYBC	LPM2
Watkins, P. Chief Executive, 1st East	LPM3

Interviewees: Torbay case study

Regional:
Wood, A. Head Placemaking and Partnerships, SWRDA   R1
Budden, C. Head of Regeneration, SWRDA   R2
Cole, A. Head of Research and Development, SW Tourism   R3
Bates, R. General Manager, Visit Devon   SR1

Local:
Lindon, L. Chair, Torbay Hospitality Association   BIZ1
Ball, L. Chief Executive, Town Centre Company, Torbay   BIZ2
Fryer, M. Managing Director, The Creativity Centre   BIZ3
Davis, S. Chair, Ellacombe Community Partnership   COM1
Brewis, B. Chair, Preston Community Partnership   COM2
Pearse, R. Chief Executive, Torbay Voluntary Services   COM3
Handford, I. Chair, Torbay Civic Society   COM4
Colley, S. Chair, Tomahun Community Partnership   COM5
Lewis, C. Conservative Councillor and Deputy Mayor and   CON1
Member for Economic Regeneration, Transport and Planning
Darling, S. Councillor and Leader Liberal Democrat Group   LD1
Denby, A. Director of Economic Strategy, Torbay Development Agency   LPM1
Cox, S. Principle Safety and Licensing Officer, Torbay Council   LPM2
Parrock, S. Chief Executive, Torbay Development Agency   LPM3