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Please find the following in support of a submission to be heard at the EiP.

As a Visiting Fellow of the London East Research Institute at the University of East London, and having been involved in socio-economic studies relating to the development of a regional casino in the Thames Gateway, it has come to my attention that there are some serious issues with regard to the short listing process for the regional casino location.

Firstly, while there is the possibility of only one regional casino, it would be short-sighted to locate this test case anywhere other than London. In terms of the facilities for tourism provided by the regional casino development, London, and specifically the Thames Gateway, is in need of such facilities to enhance its growing tourism sector.

Cases have been made for a number of potential sites for the regional casino. However it is the Rainham site, we suggest, that will most fully satisfy the intention evident in the 2005 Act around regional regeneration or "renaissance". Ferry Lane and the London riverside. Rainham provides the location best suited to ensure that the regeneration and subsequent catalytic effects fundamental to the 2005 Act's intentions and strategy will be realised in concrete, far-reaching and sustainable ways.

The Act's other aims, to ensure that a more open and mainstream gambling market place is also a safer one (protecting vulnerable people from excessive gambling expenditures) are also met in the Rainham proposal, as this is the only one of the three in London which is demonstrably apart from residential areas.

Of particular concern here is the initial emphasis on piloting and testing the one regional casino. However, the location of some of the shortlist, particularly the Dome and Wembley, are highly problematic and do not align with the testing of a casino development against both economic and social criteria. Wembley and The Dome are already established leisure based projects, to site a regional casino at either of these developments obscures any accurate recording of regeneration benefits of a casino, and as the one regional casino is to act as a "test case" for casino-led regeneration, it is both illogical and disingenuous to locate such test cases at either of these locations.

Coupled with this, the Dome and Wembley proposals stand against the primary planning priority of situating the regional casino away from more "accessible" areas, to create a destination for gambling, and in so doing reduces the possibilities of ambient gambling. This is of great concern, particularly at Wembley Stadium, where a large number of children and young people may well be influenced by attending football matches, and will begin to associate gambling with the Wembley brand.

That there is a great need for regeneration in East London and in particular in the Thames Gateway is a well known fact. An iconic "place making" development at Rainham on these significant Thames Gateway boundaries would contribute positively in the continuing work of transforming Thames Gateway from a "concept" or a "development strategy" towards becoming a viable and extensive set of interconnected, interdependent and sustainable regeneration developments to the East of London. Something unique, definitive and iconic is needed; a high quality, "destination" development that will positively mark and mark out Thames Gateway; an "Eastern anchor" which will bring (at the same time) practical, positive and estimable public benefits; jobs in the immediate and long term, but also catalytic impetus towards continual re-development, place making and "region defining". **Indeed it is improper that the Havering submission scored only 6 in terms of Regional Context, as this proposal out of all others has the unique opportunity to contribute to the region building agenda in the Thames Gateway.**

It is also surprising that the tourism argument has not been fully addressed by the scoring criteria put forward by the panel. The Mayor of London has highlighted the fact that tourism facilities are too centralised (in the West of London), thus the LDA has committed to the devolution of budget and the delivery of strategic priorities to sub-regional level. One of the key vision's of the Mayor for Tourism is the principle of "dispersal" – providing a greater provision of tourist destinations outside of West London. Indeed, if one examines the statistical data for London based tourist attractions, 80% of both free and paid admission attractions are in West London. This principle of dispersal makes it crucial that high quality, successful tourist attractions are developed in strategic area to draw tourists East. The sub-regional tourism strategy recognises that "East London is too diverse to act under a single brand umbrella." As a result, "destination brands" are supported in this strategy, and joint marketing initiatives will be encouraged to pull more tourists to East London. **For instance, joint marketing initiatives between the Silvertown Aquarium & Thames barrier park, and the Thames Gateway regional casino at Rainham & London Riverside Conservation Park would create a "region defining brand" for the development of a successful eco-tourism cluster in the Thames Gateway.**

At present there is little or no tourism in the immediate area in Havering. There are plans, however to develop the Rainham Marshes that sit alongside the proposed site into the London Riverside Conservation Park and visitors centre. Indeed, the London Riverside Conservation Park is projected to attract one million visits per year. The iconic, green design of the proposed development, with green roof and renewable energy sources, coupled with the added pull of the casino development and improved leisure facilities would create a substantial, international eco-tourist destination, which would put London at the forefront of urban eco-tourism development.

The development of an urban eco-tourism cluster is an interesting prospect, and unique for a metropolis the size of London. Eco-tourism in a burgeoning sector within the tourism market. "In 1993 the WTO estimated nature tourism generated 7 per cent of all international travel expenditure. More recent research reveals this is now much higher, accounting for 20 per cent of international travel in the Asia-Pacific region and some areas, such as South Africa, experiencing a massive growth in visitors to game and nature reserves, of over 100 per cent annually. " Also, "research by The International Ecotourism Society (TIES) reveals that eco-tourists are likely to be higher spenders on their holidays than 'ordinary' mass tourists."

Urban eco-tourism is only in its infancy – mainly due to the obvious lack of green tourism developments in urban areas. Two of the major projects for the sub-region put forward by the LDA include the regeneration and development of tourist destinations around rivers and canals, and open and green spaces, or the Blue Ribbon Network and the Green Grid vision. The proposed casino development shares these strategic objectives and priorities. As the Conservation Park is already identified in the East London Tourism Strategy, the proposed development will add critical mass to this attraction, creating a high-quality destination. The increased leisure offer that the development presents will further visitor numbers, as well as provide a capital injection to finance improvements to transport and other infrastructure, which are already planned, partly because of this visitor increase. Not only does the Rainham site act as a magnet to the East, furthering the objective of tourism dispersal throughout London, the development can be seen as a Gateway to London from Europe. European tourism to London, and in particular those coming from the EU25 countries accounted for most of the growth of inbound tourism to London from 2003 to 2004.

That environmental factors have regrettably not been considered in the initial short listing is also a concern. The largest growing tourism market, "green travel" and sustainable tourism destinations are key to attract this market. In these terms Havering is at the forefront of other developments.

- a. This development will provide the cash injection and the attraction pull to ensure the establishment and successful development of the Rainham Marsh conservation park.
- b. The emphasis on renewable energy, including the possible re-use of sewage waste from the plant next to the proposed development, and green design will further

- enhance the natural environment, and rejuvenate the present industrial site.
- c. This emphasis on renewable energy and open green space will also contribute to the local, regional and national targets for emissions, renewable energy, and air quality management. The London Plan supports energy efficient design and renewable energy in new developments.
 - d. Green infrastructure is a key area in the new planning system, and calls for a “hierarchy of Green spaces” to be included in local and regional spatial planning. The implications for eco-tourism here are also important. It is intended to extend the use of these areas, to include tourism, active recreation, for educational purposes, and to help create a narrative flow of use, from Rainham Train Station and transport interchange to the river.
 - e. English Nature and The Wildlife Trusts acknowledge the link between biodiversity and economic prosperity, and that the promotion of local biodiversity as part of an environmental asset benefits “local economies through attracting business, increased tourism, enhanced property values, healthier/happier communities.”

It is these issues that I believe should be raised in the Examination in Public, as many of these issues have been conflated and diffused with the panel’s scoring methodology.