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To London Resort Company Holdings

By email to:
info@londonresortcompany.co.uk

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Dear Sir/Madam

London Resort – Statutory Consultation – Response from TGKP

We welcome this opportunity to respond to the statutory consultation on the proposed London Resort.

Thames Gateway Kent Partnership (TGKP) has been engaging with London Resort Company Holdings about the London Resort since the earliest proposals emerged in 2012/13. We recognise that a large-scale resort on the Swanscombe Peninsula could have very positive and transformative impact, particularly in terms of employment and supply chain opportunities and the injection of investment into the North Kent economy. We are supportive of the proposals in principle subject to any potentially negative impacts and infrastructure requirements of the resort being satisfactorily addressed.

The latest consultation highlights the large volume of work that has been done to assess the impact of the resort proposals across the wide range of factors required for a preliminary environmental information report (PEIR). We recognise that the PEIR indicates both work undertaken and further work yet to be completed. But we are concerned about how many questions remain unanswered at this stage. TGKP Partners have emphasised to us that LRCH's 17 June Scoping Report did not address, or consider as 'in scope', a number of issues that would normally be considered in the preparation of a DCO application.

Whilst we remain positive about the scheme and are keen for the Resort to achieve the most beneficial impact that it can for North Kent, we are concerned that there is not enough information about a number of critical issues to enable a fully informed response. This is particularly the case in relation to transport and the environment. TGKP partners – in particular Dartford and Gravesham Borough Councils, Ebbsfleet Development Corporation and Kent County Council – have all told us that they would value greater engagement from LRCH. Given these concerns of TGKP partners, we suggest it might be appropriate to revisit the timetable proposed for submission of the DCO application. More time could be useful to enable LRCH to address in more detail the information requirements itemised in the Secretary of State's Scoping Opinion, to digest and address the feedback from respondents to this public consultation and engage with partners on detailed technical matters. Allowing time for this now would help reduce the risk of issues being identified late in the process which could lengthen or derail the examination process.

North Kent partners stand ready to engage constructively with LRCH to explore outstanding concerns and to identify and acknowledge matters on which there is common agreement. This could provide positive evidence contributing towards LRCH's statement community consultation.

We do not duplicate our partners' detailed comments, but highlight in the attached responses to your consultation questions some examples of concerns that we collectively feel need to be addressed before the DCO is submitted for examination. We urge LRCH to increase engagement with North Kent partners on these priority issues and are ready to assist to help the project to be a success and to deliver long-term transformational benefits for North Kent.

Yours faithfully

A handwritten signature in black ink, appearing to read 'MN', is positioned below the text 'Yours faithfully'.

Matthew Norwell
Chief Executive, Thames Gateway Kent Partnership

TGKP Response to the London Resort Statutory Consultation

Question 1 With the information available do you support our approach to sustainable transport and minimising impacts on the road network?

Oppose.

- The proposals at present do not represent a sustainable transport strategy or one that will minimise car usage. The anticipated mode share of 66% visitors arriving by car is significantly above what would be understood as a 'green' transport strategy, or one that would contribute positively towards the achievement of net zero carbon.
- There is not yet enough information, particularly on traffic modelling, to understand the impacts of resort-related traffic, both visitors and staff, on strategic and local road networks. On the basis of the current submission timetable, the proposal to carry out modelling work in October 2020 leaves a very short period of time to analyse the results, design any scheme adjustments that might be required, and carry out meaningful consultation with key stakeholders.
- The Lower Thames Crossing traffic model does not yet fully take account of forecast development in North Kent, so use of these data for the purposes of the Resort traffic modelling needs to be supplemented by realistic assessment of other pressures on the local and strategic road networks, in consultation with key stakeholders.
- The Transport Technical Notes shared in draft with selected local partners do not add significantly to the information in the public consultation documents. In particular, in designing the transport access approach around an "85th percentile day", the consultation documents and Technical Notes are silent about how peak days – estimated at 54 in number – would be managed sustainably. There is a serious risk that without an effective and sustainable strategy in place, transport networks including parking provision well beyond the resort boundary could be overwhelmed. We therefore urge LRCH to discuss with local partners its strategy for managing peak travel, including weekends which are not currently illustrated in the projections shared.
- It would be useful to understand why LRCH envisage maturity of the Resort as far away as nine years after the opening of the Gate 2 development. Impacts associated with operating at maturity could arise several years before this.
- We would be keen to see greater analysis of how Resort-related rail travel could affect network capacity. The strategy's approach to rail gives too little attention to the potential use of North Kent Rail Lines and relies instead on the expectation that visitors arriving by rail will use premium-cost HS1 services, or Eurostar (for international travellers). The North Kent Lines directly connect the Resort to Central London and the tourism magnet that is the West End, as well as providing access from stations both westwards into London and eastwards to Medway and beyond, likely to benefit staff travel as well as visitors. PINS' Scoping Opinion rightly stressed (4.32) that the Environmental Statement "*should include an assessment of the impacts to rail transport where significant effects are likely to occur. The Applicant should make effort to agree the approach to the assessment with relevant consultation bodies.*" We suggest that a more comprehensive analysis of rail access options and potential should be carried out in closer consultation with TGKP partner bodies, Network Rail, Southeastern Railways and HS1.
- The proposals give do not give appropriate recognition of the potential of improving Swanscombe Station, which is immediately adjacent to the Resort site, opting instead for Greenhithe as the preferred North Kent Lines station. LRCH's preferred option would put more vehicles onto local road networks to get people from Greenhithe to the Resort and present potential local congestion pressures, not least because Greenhithe also serves Bluewater. Swanscombe's proximity means that people will use it and need to be able to do so safely.

There is a positive opportunity here to help deliver a benefit (an improved, accessible station) that would serve both staff and visitors to the Resort and the wider community and we encourage LRCH to explore this potential further with Network Rail.

- Regarding HS1, the analysis does not fully consider the pressure additional journeys could place on the network given existing severe peak and non-peak capacity constraints.
- LRCH will be aware the Government is funding a study (AW2E) into options for enhancing connectivity between Abbey Wood (as the present terminus for the south east branch of Crossrail) and Ebbsfleet. The Study, in which TGKP is a partner, is “mode-agnostic” and is focused particularly on the level of development uplift, notably housing, different options could support and how different options might be funded and financed. Extension of Crossrail itself is one of the options under consideration; and whilst LRCH’s transport strategy is designed not to be dependent upon such an intervention, nor does it demonstrate any consideration of the additional benefits and access implications of connectivity to visitor and labour markets that such an intervention could unlock. More generally there could be synergies between interventions in this corridor to support housing and economic growth and helping deliver a more sustainable transport access strategy for the Resort. This would merit closer analysis in collaboration with the AW2E Study team.
- The transport strategy (in particular the ‘People Mover’ proposal) makes assumptions about extension of Fastrack services that do not seem to be substantiated by detailed engagement to date with Kent County Council over the specifics or consideration of how this relates to the phased expansion of Fastrack already planned.
- Whilst we welcome in principle the proposals for greater use of the River Thames to enable visitors and staff to access the Resort, there is a lack of detail to demonstrate how the envisaged mode share might be achieved and how car-based visitors travelling from the north would be incentivised to use Tilbury rather than either the existing Dartford Crossing or, when built, the proposed Lower Thames Crossing to drive direct to the Kent site.

Question 2 With the information available, do you support our approach to keeping London Resort traffic separate from local traffic?

Neutral

- There is not yet enough information to understand the effects of Resort traffic on local networks.
- The consultation materials lack detail on the likely geographic distribution of the Resort’s workforce and how they will travel to work at the Resort.
- There is ambiguity and lack of detailed information about how much development will be outside the Resort ‘pay line’ – i.e. the hotels, water park, ‘Conferention’ centre and e-Sports centre, retail, dining and entertainment – and the likely quantum and journey patterns of both staff and visitors to these facilities.
- It is unclear how the proposed changes to the A2 Ebbsfleet Junction relate to the modifications to which Highways England is already committed. The proposed signalisation of the junctions could impede local traffic flows, particularly at peak times.
- The proposed access road could have negative impacts the potential developable land in Central Ebbsfleet. It also potentially increases severance as the Masterplan design suggests an open road (no enclosure) and compromises the functionality of the important installed bridge over the high-speed rail lines south of the international station.

- The access road will increase noise and air pollution affecting local residential areas as well as the proposed commercial centre.
- The parking strategy indicates arbitrary levels of provision that do not bear an obvious relationship with visitor forecasts, particularly on peak days and at maturity. Unless mode shift away from car use is proactively managed there is risk of increasing parking pressures across other nearby locations, notably at Bluewater.
- One site identified for car parking (including temporary possession of land and permanent access rights) encroaches on Northfleet Rise which is a designated Enterprise Zone (part of the North Kent Enterprise Zone) effective until 2042. Every effort should be made to avoid interfering with delivery of the enterprise zone to create high value business and employment opportunities.

Question 3 With the information available, do you support our approach to the environment and biodiversity?

Neutral

- The Resort proposals offer the potential to improve aspects of the environment and biodiversity of the Swanscombe Peninsula.
- The consultation documents do not contain sufficiently detailed information to comment on the impacts of the development, the scale of benefits that enhancements might deliver, or the adequacy of mitigations proposed.

Question 4 With the information available, do you support our approach to sustainability?

Neutral

- The consultation signals positive ambitions in pursuit of sustainability, but there is not yet enough detailed information to assess the proposals.
- The Guide to Consultation indicates meaningful intent to minimise the Resort’s carbon footprint but sends slightly inconsistent messages about what this means in practice. It refers variously, for example, to “pursuing a net zero emissions goal”, “operationally net zero carbon across our design, development and operation” and “taking full advantage of on-site opportunities and integrating off-site measures.” The reference to off-site methods of offsetting carbon emissions raises further questions about where geographically such measures could be implemented and to what extent these might benefit the communities impacted by the Resort.

Question 5 With the information available, do you support our approach to walkways, cycle routes, and public rights of way?

Neutral

- In principle we welcome measures that will improve public access to the natural and recreational assets of the Swanscombe Peninsula and encourage access to the Resort by non-motorised modes of travel. We defer to Kent County Council’s advice on public rights of way and ensuring that enhancing public access is matched by suitable measures and mitigations to protect the peninsula’s important wildlife habitats and biodiversity.
- More detail is needed on the measures proposed both as part of the transport/access strategy for the resort, especially for workforce travel, and off-site benefits.

Question 6 Based on the information available, do you support our approach to cultural heritage?

Neutral

- We know that LRCH have already started conversations with partners working on “Creative Estuary” and the Thames Estuary Production Corridor, and we would urge you to continue these as the proposals develop, as one means of maximising the Resort’s cultural, creative and heritage benefits to North Kent.

Question 7 Based on the information available, on balance do you think the London Resort will benefit the local area in the longer term or create more problems?

Neutral

- The issues are complex and not binary the question seems to imply. The Resort would undoubtedly bring economic benefit to the area. However, without a set of appropriate mitigations, it could also create more problems.
- To succeed in delivering genuine socio-economic benefits, the Resort needs to be well integrated into the local area – particularly with the emerging Masterplan for Ebbsfleet Central. The current access road proposal is an example of where the plans for the Resort could need substantial modification to harmonise with wider ambitions for Ebbsfleet Garden City.
- The consultation documents do not offer provide detail about the nature of employment opportunities. It is thus hard to assess how many of these would be higher skilled, higher value jobs that would contribute qualitatively, as opposed to quantitatively, to the jobs market.
- The Resort will directly displace several businesses, many of which will not find alternative premises or locations and will thus be lost from the North Kent economy.
- The Resort would give rise to a substantial demand for additional housing for its workforce within a reasonable (and sustainable) travel-to-work area which is already under severe pressure to meet forecast demand and affordability challenges. That in turn will increase pressures on other infrastructure required to support housing uplift. This is implicitly recognised in paragraph 48 of the PEIR Non-Technical Summary and is an area that will require further analysis and engagement with local partners to inform the DCO.
- The scale of dining, retail and entertainment development in front of the pay line could introduce direct competition for other centres in North Kent it would be useful to understand how they could complement rather than compete with existing provision across Kent and Medway.
- The consultation documents indicate the expectation that overnight visitors not staying in on-site hotels will predominantly stay in accommodation in London. However, it seems likely that this will increase demand for bed-spaces across Kent. This could benefit the visitor economy provided there is capacity. An interim report on research carried out for Visit Kent and Locate In Kent in 2019 showed significant unmet demand for hotel accommodation in Kent and Medway. These agencies and local authorities are seeking actively to promote an increase in provision, particularly through an identified pipeline of investment opportunities. It would be useful to understand how LRCH could help to increase the provision of hotel bed space across Kent and Medway.

Question 8 Based on the information available, do you agree with our approach to accessibility and inclusivity?

Neutral

- The consultation materials do not yet provide enough information to comment. We commend the headline ambition to create an inclusive and accessible environment: this should extend to both visitors and the workforce.
- There are potential risks to accessibility during the construction of the Gate 2 development, as it appears that this will run in parallel with Gate 1 operations: this will see Bell's Wharf used for both passengers and construction traffic.

Question 9 With the information available, what are your thoughts on the emerging masterplan and the mix we are proposing?

Neutral

- We would welcome more information here to enable a fuller assessment.
- The distribution of retail, dining and entertainment behind and in front of the pay line is at present unclear.
- Transport access arrangements encroach heavily into the heart of Ebbsfleet Central, this could create a risk that the centre becomes a transport interchange geared to the Resort rather than the broader commercial centre of the Garden City.
- The transport access strategy, and its influence on masterplanning, is too heavily weighted towards car users.
- The draft DCO schedules set out a framework for consented development that leans heavily towards flexibility and gives little precision about the footprint and design of development. Until the detailed design statement is available it is hard to make an informed assessment of the mix proposed.

Question 10 We would like to know what is important to you. Please let us know if you have any further comments on the information presented at this stage.

- TGKP and its partners welcome the proposals from LRCH and the fact that after a number of false starts there appears to be genuine progress. As indicated by our comments, there are significant areas where we feel that a greater level of information, analysis and dialogue with stakeholders is needed to enable a full evaluation of LRCH's proposals before the DCO is submitted. We urge you to continue the positive engagement you have started with TGKP and other, wider Estuary partners as the project develops.



The Thames Gateway Kent Partnership is a public-private partnership, established since 2001, promoting sustainable economic-led growth and regeneration in North Kent.

The top priorities in our *Plan for Growth 2014-20* are:

- Delivering growth in key locations
- Attracting and retaining investment
- Focusing on quality
- Supporting businesses – growth key industry sectors
- Supporting businesses – increasing innovation, enterprise and creativity
- Improving skills, qualifications and employability

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