

## London Resort

### Gravesham Borough Council Response to Statutory Consultation

1. This response represents the views of Gravesham Borough Council on the proposed London Resort on Swanscombe Peninsula on the basis of the consultation material published on 27 July 2020. It ignores any additional information that may have been provided since and any previous material, although that is relevant to the evolution of the scheme and may be incorporated in the consultation material any case.
2. Comments were made on the Environmental Scoping document on 20 July 2020 and PINS issued its response dated 28 July 2020<sup>1</sup>. It is appreciated that the consultation material could not in practical terms take either of these, or the comments of other parties, into account. They will need to be taken into account in the submission documents for the DCO application. This is also in a context where there will be ongoing discussions on issues, which may allow agreement to be reached on technical matters, impacts and their mitigation.
3. The proposal is primarily located in Dartford Borough, with elements in Gravesham and also north of the Thames in Thurrock. Dartford, Gravesham and Thurrock are the Local Planning Authorities. The Transport Authorities are Kent County Council and Thurrock in their respective areas, with Kent County Council dealing with County level matters. The development management authority for much of the proposal is the Ebbsfleet Development Corporation. These comments do not attempt to distinguish, for the most part, between these bodies, although the detail will be a matter to be sorted out in the DCO in respect to requirements, section 106 and other matters. That said the comments are primarily focussed from the Gravesham perspective.
4. An information only report was taken to the Council's Cabinet on 7 September 2020<sup>2</sup> setting out the nature of the proposals, the documents supplied, the works that are in Gravesham, some of the obvious benefits and examples of matters that require further investigation.
5. Although a draft Development Consent Order (DCO) was published as part of the consultation, these comments do not directly deal with that document, which will be subject to ongoing discussions, except in so far as the comments below have implications for its content. It is pertinent to note that the DCO process assumes that the development can be precisely defined and therefore the requirements necessary for regulating the construction and operation clearly defined.
6. A major overarching factor in the analysis of the implications of this proposal is that there are no direct comparators in the United Kingdom, and relatively few overseas. It is not therefore possible, on many matters, to provide a comprehensive factual base from which consider local impacts. This affects both the applicant and those seeking to analyse it.
7. Allied to this point is that the development does not operate over 'traditional' hours and can therefore have significant implications at times and places which would not normally give rise to concern. For example, the site is currently indicated as closing at 23:00, which potentially puts traffic on roads and the public transport system when they would normally be very quiet. Some facilities in the publically accessible central

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<sup>1</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/BC080001/BC080001-000300-LNRS%20-%20Scoping%20Opinion\\_COMBINED%20v2.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/BC080001/BC080001-000300-LNRS%20-%20Scoping%20Opinion_COMBINED%20v2.pdf)

<sup>2</sup> <http://democracy.gravesham.gov.uk/ieListDocuments.aspx?CId=149&MId=4399&Ver=4>

core may wish to operate later. It will therefore be necessary to consider appropriate mechanisms for suitable forms of control over the operation of the resort to ensure that any identified impacts that emerge (now or when built) can be mitigated or removed altogether.

8. Allied with this is the impact of COVID-19 Pandemic on long term patterns of behaviour. This makes updating difficult, for example traffic surveys, and raises questions about what the new 'normal' is (or is not). The Council is hopeful that it should be possible to agree some scenarios to be tested for the major uncertainties this raises.
9. The Council broadly supports the proposal as it offers significant economic and job opportunities for Gravesham residents. These will come from both the construction process and development when in full operation. There are opportunities for local businesses to provide goods and services both during construction and when in operation, as well as the opportunities that may arise from the numbers of visitors expected to be drawn to the area. The Council will be keen to work with the project to see how these benefits can be maximised.
10. The masterplan is broadly supported, subject to the comments elsewhere in this response, as a basis for further discussion and development. Whilst the reasons for phasing Gates 1 and 2 are understood it will be necessary to examine how the implications of a site under construction and in operation at the same time can be resolved. Overall there is a need to better understand how the Resort interacts with the development around it.
11. There are however implications, because of the land take, on the overall development of the Ebbsfleet Central area through loss of land to transport infrastructure and potentially a refocussing of the type of development. There are some important environmental issues to be addressed. It is important that, insofar as is possible, that the combined impacts of the major local schemes are taken into account. As well as Ebbsfleet Central area, these include the rest of the major developments already underway in the area, Lower Thames Crossing, and developments in Thurrock and Medway, all of which may be relevant.
12. The Preliminary Environmental Impact Report (PEIR) and appendices contain a large quantity of information and a large number of commitments to further steps and analysis that is going to be undertaken. Until this work is done it will not be clear if there are solutions to identified issues or whether new matters emerge. The timescale for achieving this on current intentions is very tight and the Borough Council would be concerned about an incomplete application being made.
13. The topics are examined in the order of PEIR. The nature of the development is taken as in the description set out in PEIR, the draft DCO and other documents and is not repeated here. Appendix 1 contains some more detailed comments on parts of the PEIR.
14. The analysis of alternative possible sites for the proposed development is noted but not subject to any further comment.

#### **Socio-economic effects (chap.7)**

15. A project of the scale and ambition of the proposed London Resort will have a significant impact on the local area and its economy. The construction and operation of the attraction itself, scale of its development footprint, associated visitor economy opportunities as well as indirect and induced job creation associated with the resort, which will create an additional economic multiplier over time. At this stage, a number of other opportunities are anticipated to generate benefits for the local and regional

economy, which have the potential for significant positive impact upon local communities.

16. The proposed emphasis upon modular construction methods to build out the site and key elements of the attraction, could be an opportunity to develop comparative advantage within local and regional supply chains, where innovative new solutions are required to construct, operate and manage the resort.
17. The scale and concentration of businesses within related sectors is likely to generate agglomeration benefits, which improve the competitiveness of these clusters and raise the Gross Value Added (GVA), with the associated benefits of typically higher skilled and higher paid employment and business opportunities.
18. Learning and skills development, to create career pathways for new entrants to the job market and for re-skilling older workers. The scale and range of functional specialisms could be expected to stimulate the local availability of new training options and qualifications. A standalone employment and skills strategy which goes into greater detail regarding expected job roles and skill sets, has been offered and would be well received.
19. In support of wider 'place shaping' ambitions for Gravesham and the North Kent functional economic area, there is an opportunity to maximise local economic benefits by co-ordinating future plan making and potentially specific geographical measures to encourage a high quality associated retail, hospitality and leisure offer across the Borough as well as the resort itself.
20. Similar to the above, there are likely to be opportunities to drive physical and social regeneration, through the identification of borough-wide assets such as facilities / venues, talent development initiatives and local voluntary / public sector organisations able to benefit from links with the resort, in terms of complementary activities. These might involve social or commercial objectives.
21. It would be expected that the application will include:
  - A thorough record of all businesses trading from premises within the Project Site Boundary (PSB) and also a record of all employment land or related premises situated fully or wholly within the PSB. Bespoke company data is widely available, enabling an accurate listing of businesses within the subject area; including the site and type of individual businesses,
  - Early and meaningful engagement with building materials and construction businesses operating in the Botany Marshes area, which could identify opportunities to use their local knowledge and capacity to supply materials during the construction phase of the London Resort project. As significant local employers, providing a range of skilled employed opportunities, these businesses play an important role in sustaining and creating local employment in the area. Their contribution to the local economy is valued and should be enhanced.
  - The source data and assumptions used to inform modelling to estimate the number of direct and indirect jobs and other economic activity likely to be created, as well as breakdowns of visitor typology such as staying visitors and day trippers, for example.
  - As mentioned above, a detailed employment and skills strategy is expected.
22. From the Local Plan perspective, there are potentially significant changes in land use, employment floorspace, retail and service provision and pressures on the housing market. Although there are a number of development opportunities within the urban area, which this proposal may well indirectly assist in bringing forward,

there could be pressures for additional land release which raise environmental and Green Belt issues.

23. Leisure and retail provision, primarily in the publicly accessible parts of the development could have implications for such provision in Gravesend Town Centre, which the Local Plan makes the primary centre in the Borough. The Council would therefore be concerned about impacts on the Town Centre, but equally is aware of the opportunities for complementarity and attracting resort visitors, particularly those staying, with a distinctive offer. It is important that a development the size of the resort engages with the local community through appropriate mechanisms both from the perspective of local residents but also the business community.
24. Fastrack / bus / rail /ferry access to Gravesend is important in that context. Equally the concern on the transport front is that regeneration and its transport trips can be accommodated as expected, and the Resort has not removed capacity in the overall system.
25. Existing businesses will be displaced by the construction process with implications for employment and the functions those businesses perform in the local economy. This may also apply indirectly to other businesses where land owners seek higher rents or labour costs rise leading to movement or closure. In Gravesham the indirect implications for businesses served by Lower Road / Manor Way (Northfleet) are not clear both in terms of potential access constraints and in the longer term. Some of these businesses are well placed to be part of the supply chain for the Resort.
26. The current proposal includes the provision of 500 homes, which is welcomed as providing a buffer against additional demand in the local housing market. Logically there will be demand across Dartford and Gravesham for housing for employees, some of which will be permanent / long term and some of which will be temporary to cope with summer peaks. Both these may place stress on the local housing market, whether for purchase, rent or in the social sector.
27. Land take in Ebbsfleet Car Park C for a multi-storey car park along with uncertainty over what is proposed since a set of options has been suggested with no clarity. The Borough Council would be very concerned over anything that substantially removes development land in Gravesham as that potentially has knock on implications for the Local Plan and the Green Belt. Ebbsfleet Development Corporation is carrying out masterplanning exercises on central Ebbsfleet and the Blue Lake area and it is essential that the proposals are integrated together and not treated as discrete elements. See also the comments on Northfleet Station below.
28. The introduction of new population into the area, as noted under health, has implications for the provision of a wide range of community services from open space to social services. Detailed discussions will be needed to tease out what those impacts may be and what can be done to mitigate them. This will require engagement with the local community as well as the relevant providers.

#### **Human health (chap.8)**

29. The urban areas of North Kent have a poor record on health for a variety of reasons, including the legacy of chalk quarrying and cement manufacture. The AQMA at Northfleet for dust is evidence of this. It is important to note that using figures for Dartford and Gravesham at local authority level can hide that there are very significant differences historically between the urban areas north of the A2 and rural areas. New development (and therefore its population) and the passage of time will no doubt narrow that difference.
30. The proposed development offers a significant amount of employment opportunities which should have beneficial implications for the overall population. There are also

obvious potential negative effects from noise, air quality, dust and related matters dealt with elsewhere as well as the introduction of significant numbers of people (employees, visitors etc.) into a relatively small geographic area.

31. The following concerns will need to be addressed and whether significant mitigation or other measures put in place:
- Impact of the construction process, including temporary labour, and the implications for local medical services (including for example access to Darent Valley Hospital as well as its capacity);
  - The same in relation to operation of the resort with employees and visitors which will bring significantly higher numbers of people to the area who may have short term medical needs; and
  - Any implications for loss of open space and access links (including cycle routes) – though equally there may be opportunities to enhance these as is already happening within and around the Garden City by the Ebbsfleet Development Corporation

### **Transport (chap.9)**

32. Travel to / from the development is one of the greatest areas of concern expressed by local residents and are an important driver of air quality and noise impacts. In summary the proposed transport strategy is to build a new dual carriageway from the Ebbsfleet A2 Junction into the site, with other access points limited to buses, local deliveries and emergency services. Usage of public transport will be encouraged using a mixture of bus (including Fastrack), rail and ferry, combined with 10,000 car parking spaces and encouraged potentially by pricing policies. The proposals at Tilbury for a multi-storey car park and a ferry connection to Swanscombe introduce a whole new element compared with earlier versions of this scheme. It is also proposed to use this route in the construction phase for materials.
33. The Borough Council raised a number of transport issues in its environmental scoping response about transport (see para's 4.28-4.49 of that response), both in regard to the completed development but also the construction phase. The latter takes place in the context of existing transport infrastructure and also the delivery of many other projects locally, in particular Ebbsfleet Garden City development and Lower Thames Crossing. It will be necessary to consider the combination effects including the capacity of the local labour market and the provision of sufficient accommodation for labour drawn from further away. In the case of the Lower Thames Crossing, if permitted, construction will potentially coincide with the rebuilding of the A2 east of Gravesend.
34. The Borough Council welcomes the objectives of the overall transport approach but there are a whole series of details that need to be evidenced so that it is clear that it can actually be delivered. On traffic modelling the Borough Council has already made clear that reliance on LTAM outputs (which also went into A2 Bean & Ebbsfleet junctions sub model) are not sufficient both because of omission of potentially significant development and because it is not multi-modal. The new KCC transport model would be the robust way of approaching this issue.
35. All modes face the issue of whether they can deal (including the knock on impacts) with the peaks that the resort makes across the day, including at unusual times. Use of the 85% percentile has been agreed by Kent County Council, but that leaves 54 days that exceed that level. The difference between 38,000 daily visitors and 53,000 as the top limit is a 39% increase, with additional staff and visitor trips. There needs to be a clear strategy as to how the trips and parking will be managed on peak days. This also applies to how Resort peak demand will managed in the run up to 10 am

opening, late afternoon / early evening (when the normal evening peak occurs) and at closing time.

36. Rail services need to be fully explored as to how they may need to be modified to meet the needs of the resort – the 10 am start and with potentially significant numbers leaving late in the evening on some days at least. This is an area where the implications arising from COVID in the longer term are particularly unclear. Network Rail is currently studying the North Kent line and technical work funded by MHCLG is underway on possible Crossrail extension or other means of serving development in the wider riverside corridor.
37. The proposals for Ebbsfleet International and the connecting bus link present a coherent package. The North Kent line is a different matter as use of Greenhithe station is not enforceable. Swanscombe is the closest station but is physically unsatisfactory in a number of ways. It will be used by staff and visitors so it needs to be able to cater for the demands placed upon it. Two obvious options are widening the Swanscombe High Street bridge into a station building with lifts etc., but that still leaves the issues of getting on foot to the resort. A connection off the down end of the platform's end could well be a more fruitful avenue to explore and picks up on the link from Ebbsfleet International. The ability to link by means of tunnelling through the chalk spine could also be explored.
38. Northfleet station could also have a role to play, although access by road is through narrow streets and should not be encouraged. Staff may wish to walk down the hill to the back of house area assuming there is a pedestrian entrance from the Lower Road direction.
39. Gravesham supports the desire as set out in Ebbsfleet Development Corporation's Implementation Framework<sup>3</sup> to link Northfleet Station with Ebbsfleet International. The Borough Council needs a guarantee that the London Resort proposal would not in any way preclude that desire.
40. River transport ideas from Tilbury of 'park and glide' are innovative, but it is unclear how this could be delivered in practice. Substantial evidence is needed that such car trips from north of the river could be made to divert to Tilbury, especially in the context of the Lower Thames Crossing being delivered in 2027/8 as there will be then simplistically two routes to the main resort from the north. Although there is a ferry element the bulk of the journey will still be a car-based one and does not offer the same level of convenience that onsite parking offers.
41. A degree of reliance is placed on modal shift / car park space capping and it is necessary to know how this can be made to work in practice (see comments above in para 29). Parking is a constraint but the local councils will need to know how the booking system is going to be managed and what happens when capacity is reached. On street parking in Swanscombe, Northfleet or Ebbsfleet Central, albeit with a walk, may be seen by drivers as much more attractive and flexible than paying high parking charges. This matter was raised in the previous consultations and needs to be examined in detail to see what management measures may need to be put in place (CPZ, parking restrictions, etc.). This could have a major potential impact on local residents, existing and future.
42. Although water taxis are mentioned there does not seem to be attention made to road taxis which form part of the transport mix. Provision needs to be made for these in the transport hub and the Borough Council would expect the DCO to make provision for Gravesham taxis to pick up.

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<sup>3</sup> <https://ebbsfleetdc.org.uk/the-vision/>

43. The development boundary extends along the A2 at Pepper Hill as an extension of the Ebbsfleet junction improvements (and also to Northfleet Substation East for electricity supply). In highways terms it is not clear what this is for and whether it involves changes to the road layout or is more related to matters like signage. On the latter point, the Ebbsfleet junction will be serving many destinations so clear routing is needed (albeit less of an issue in the era of Satnav and autonomous vehicles).
44. The A2260 Ebbsfleet junction on the A2 is already being improved by Highways England in a scheme currently under construction. It is important that whatever is proposed at this junction caters for the development traffic from the area as well as that generated by London Resort, and does not indirectly cause problems on the existing and future local road network. It is particularly important to ensure that the smooth operation of Fastrack and local bus services in the area is not disrupted as this would undermine the public transport ethos.
45. The Peninsula has a number for Public Rights of Way as well as a number of informal routes. DS1 and NU1 now form part of the national Coastal Path. These form an important local link and should be enhanced. As the Borough Council understands it Lower Road/Manor Way/Green Manor Way are not PROW but highways not maintainable at public expense. This is confirmed by Schedule 1 and Schedule 3 Part II of the Channel Tunnel Rail Link Act 1996 under Works 10G, 10H and 10 J.<sup>4</sup>
46. Given the narrow width of A226 Galley Hill Road, including having a footway only on one side in part, it is highly desirable to have an east – west route through the site for walking and cycling as well as north - south. Ebbsfleet Development Corporation has carried out work looking at the various links in the area and will be able to assist in this matter.
47. Access to the resort by the emergency services needs to be understood as planning will need to deal with the possibility of the A2 being or becoming blocked. It is assumed that they will be able to use access on to Manor Way, Swanscombe and Lower Road onto the A226.

### **River Transport (chap.10)**

48. Comment has already been made on water-based transport as part of the overall travel mix. In particular it is important that the Tilbury Ferry (Tilbury to Gravesend Town Pier) be retained and enhanced as a basis for making much better use of the river for local transport and strengthen north – south connections. The statement at para 10.61 is welcomed, however the development boundary covers the entire Tilbury landing stage. Gravesham owns the Town Pier and Pontoon and is keen to see greater use of these to support the economic regeneration of Gravesend Town Centre.
49. There are, in effect, two river transport markets. A long distance (Thames Clipper) service for Resort visitors and also commuters into London. There is also what might be termed a local market for resort, employment, school, etc. traffic between Swanscombe Peninsula, Grays (as a potential ferry destination not mentioned in PEIR), Tilbury and Gravesend, and possibly other destinations.
50. The chapter notes some of the potential impacts on the river and its margins viewed as a transport corridor. The Borough Council has made representations on the Tilbury 2 port extension DCO application over noise, air quality, lighting and disturbance. It is important to treat the river and the adjoining banks as a unit for this purpose and examine the implications for a significant increase in traffic on this

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<sup>4</sup> <https://www.legislation.gov.uk/ukpga/1996/61>

stretch of the river. This is particularly relevant for traffic outside the normal working day and taking into account the influence of the tides on river traffic.

51. The river is proposed to be used for bringing in materials as well as supplies / waste during operation. The Borough Council welcomes this as a general principal but will need to see more detail as to the actual implications and practicality. For example during construction it would be illogical for goods / lorry movements coming from south of the river to travel north of the river only to come back again by water. Options for the use of rail can also be explored given the availability of existing rail freight sidings at Northfleet.

### **Landscape and visual effects (chap.11)**

52. The London Resort is major proposal and will contain buildings of a significant height and scale, as witnessed by the parameter plans (summarised in para 11.70). These provide a great deal of flexibility on what the actual scale of development is and it is important for any assessment to give a clearer idea of what is actually involved and what it might look like. Audiences include those using the development (inside it), those approaching it on transport links, and the wider residents and those passing by as opposed to travelling to the site. It will also introduce a significant amount of lighting into the area with visual effects compared with current levels.
53. Paragraph 11.18 makes reference to 2km and 6 km distance bands but both distances need to be considered in context and account taken of the actual zone of visual influence. From Swanscombe Peninsula there are views up and down the river toward Cliffe in the seaward direction and the Queen Elizabeth Bridge (and beyond) up stream. It is important therefore that the analysis is not unduly constrained by arbitrary distance limits since long distance views are potentially significant as well and flat landscapes have a tendency to be undervalued.
54. It should also be noted that there is a difference to the main development (Gate1, Gate 2, central core, etc.) which will be read as a unit from any distance and the outlying structures on the tip of the peninsula or elsewhere which will potentially be much more prominent as a result of their relative isolation. This particularly applies to work 14c (with AOD height of 27m) – described as an energy centre, with a variety of possible locations within the development area.
55. Parameter plans imply structure heights of up to 100m AOD. Most of the site in Kent is in the order of 2-3m AOD, so some potentially very large and bulky buildings are being injected into a landscape that is relatively flat. Even some of the structures within former quarries appear to protrude above the sides of these. That said there are some larger structures in the vicinity such as 400kV electricity pylon (open structure 196m high), Seacon and Britannia Refined Metals in Northfleet.
56. The legacy of chalk quarrying means that there are significant white cliffs, which makes the local landscape quite distinctive, and also that some key infrastructure sits on chalk spines (e.g. A226 Galley Hill Road, North Kent Railway line). Historically there has been large scale development in close proximity to residential properties (e.g. now demolished Northfleet Cement Works) so this gives opportunities (as found with the tunnels beneath Northfleet) but also constraints from the lack of accessibility due to height differences.
57. From parts of Northfleet there will potentially be significant views into the development. Residences on the slope up to Northfleet High Street are potentially directly affected. Views from further afield are also relevant, e.g. from properties on Springhead where there are views down the valley and out to the peninsula. Consideration should be given this, though complicated by ongoing development, to adding a viewpoint from there to the list. Viewpoint 50, from the Tilbury Ferry, needs

to be appropriately located for the impacts on Gravesend riverside (or alternatively an extra point added).

58. Para 11.73 suggest that NKL line travellers are receptors. The line is on embankment and a bridge over HS1 between Swanscombe and Northfleet stations so they will have significant views over the site, especially on trains stopping at both stations which move slowly due to the short distance involved between them. HS1 travellers will see much less as they are descending into, or emerging from, the Thames Tunnel
59. In the Ebbsfleet there was always an intention to have large scale buildings which is implicit in the outline consent, along with access roads. The dual carriageway does introduce a larger linear feature than would otherwise have been expected which is a major road, not an urban street, and also impacts on open areas (SSSI, etc.).
60. Taking all this into account, the results presented in table 11.6 implying only the Botany Marshes LCA is subject to a moderate significant effect in landscape terms is not plausible.

### **Ecology and biodiversity (chap.12)**

61. The chapter illustrates that there is potentially significant nature conservation interest on the Peninsula and the linkage with the North Kent Marshes Ramsar/SPA which are of international importance. Other consultees are better placed to produce detailed technical comments on this matter.
62. It will be necessary for the Environmental Statement to show that the impacts can be mitigated by the enhancement of the undeveloped areas that are retained at Botany Marsh and Black Duck Marsh. These will be in the context of a dramatic change in the level of human disturbance in the area, both inside the resort complex but also from the other changes to access to the Peninsula.
63. The Ramsar / SPA is also under pressure from new development in Gravesend (and further east in Medway) so this factor needs to be taken into account. There is a tariff payable<sup>5</sup> by residential development within a 6km of Thames Estuary Marshes. This would include any residential development in Gravesend in the Ebbsfleet or at Pepper Hill, but not on Botany Marshes. As currently understood this proposal would not trigger such a payment directly but the principal may be applicable due to direct and indirect impacts on nature assets or from additional development pressures.
64. It is noted that Buglife are starting a petition that the marshes be designated an SSSI. This implies, at the very least, that there is significant ecological interest in the area. The remaining areas of fresh marsh may not be sufficient.
65. The implications for the Bakers Hole SSSI with its geological and archaeological significance need to be fully explored and how the issues that arise are going to be addressed. Crossing this area in an acceptable way poses significant challenges.

### **Marine ecology (chap.13)**

66. The proposed analysis that needs to be done and that the designating of the Swanscombe Marine Conservation Zone has been taken on board. It is noted that a sensitive lighting strategy is under consideration for the marine as well as the land based environment. No further comment is offered at this stage.

### **Cultural heritage and archaeology (chap.14)**

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<sup>5</sup> <https://www.gravesend.gov.uk/home/planning-and-building/nature-conservation-and-landscape/thames-estuary-and-marshes>

67. As was highlighted in the Council's response the Environmental Scoping the Ebbsfleet Valley is an area of great archaeological importance. Although much of the ground has been disturbed by quarrying and development, archaeological investigations to date have found everything from woolly elephants to Anglo-Saxon water mills. The area also has a rich industrial heritage from chalk extraction and cement manufacture.
68. This both introduces potential constraints, but also provides opportunities for this heritage to be celebrated as part of the development.
69. In the marsh area the chapter illustrates that there is potential for buried assets to be found even under the areas where tipping has occurred provided that the water table has remained high enough. The Council would defer to KCC Archaeology for their advice on this matter.
70. Northfleet contains a conservation area and a number of listed buildings, as does Gravesend Town Centre, opposite the proposed facilities at Tilbury. There is also the Rosherville Conservation area on the river between Tilbury and the development. The impact of the proposals, direct and indirect, on the setting and appreciation of these assets needs to be robustly evaluated. Much will depend what the proposals are for the Tilbury Ferry terminal and what the implications are from additional river traffic.

#### **Noise and vibration (ch.15)**

71. As with Air Quality this is a topic area where a technical meeting has been requested by the applicant. Accordingly the comments here are general and limited since more detailed input will come through the more detailed technical engagement.
72. The site will require a considerable amount of construction activity, which with Gate 2 will run along with the operation of Gate 1. A comprehensive code of construction practice hours of the operation of the resort, shielding of equipment etc. will be required to minimise the implications especially for any nearby residential properties. The applicant should investigate if there are any noise sensitive businesses in the vicinity.
73. Appreciating the difficulties of doing this it is important that an illustrative construction programme is produced to understand how various operations may fit together. This has to include construction traffic routing which to start with at least can only use existing infrastructure until a route can be provided along the future access road alignment. Piling will be a particular concern in relation to vibration. Past experience has shown that vibration transmission through chalk can produce unpredictable impacts. On the Gravesham side at least it is known the underlying chalk dips steeply downwards towards the river in the vicinity of Stonebridge Road. Understanding the chalk/alluvium boundary across the entire site has implications for depth of piling and therefore the noise impacts.
74. The operation of the resort gives rise to traffic and related noise implications for which methodologies are well established. Traffic modelling results are needed before this traffic element can be analysed. The operation of the resort will however produce its own noise profile and it is noted that the chapter makes references to screams for example. It is proposed to use Europa Park as a comparator and it will be necessary to explain clearly factors such as setting, degree of containment of rides etc. may influence the results. It is not clear at this stage to what degree in the Resort noise making activities will be inside buildings, though the latter will give rise to noise (plant and machinery) in their own right.
75. Fireworks and noise in the evening are potentially a matter of concern because the noise impacts could spread over a significant area relatively late in the evening when

background noise levels are reduced. The long term management of the site, including replacing/upgrading rides, needs flexibility but also control to ensure that the environmental envelope that is assessed is not breached.

#### **Air quality (ch.16)**

76. As with Noise this is a topic area where a technical meeting has been requested by the applicant. Accordingly the comments here are general and limited since more detailed input will come through the more detailed technical engagement.
77. Operation of construction machinery and dust is noted. This highlights the need for an illustrative construction timetable to understand how long operations, and at what scale, may potentially go on.
78. It is not clear what is involved in the Energy Centre which has multiple locations and a chimney that implies emissions. The Council would expect there to be one location in the submission DCO with the environmental impacts assessed.
79. The Borough has had a poor air quality base historically and has been working hard to improve this. The assessment is not simply about whether impacts are significant but also whether they help with the improvement to the air quality climate in a context where it is assumed that electrical vehicles etc. will bring benefits for pollution levels from the road network over time. The long term impact of increased air pollution on the health and welfare of Gravesham residents, particularly the young and the elderly, should be fully assessed and mitigated.

#### **Water resources and flood risk (chap.17)**

80. The chapter sets out a comprehensive range of studies and data sources, etc. that will be used to address a range of hydrological issues.
81. The flood defences will be raised to meet 1 in 1000 year flood from the Thames, which is impacted by rising sea levels. This will need to take into account the Environment Agency plans set out in Thames Estuary 2100. It is also important that there is an agreed strategy to defend the whole of the flood cells since raising defence levels for the London Resort site on its own will be insufficient.
82. The resort is going to need a substantial supply of water and it is not clear how this will be provided in an area already under stress and subject to considerable development pressures. The development in itself, its water supply and its waste water has potential to have knock on impacts on other parts of the hydrological system. Convincing evidence will be needed that this can be achieved without impacting on household and industrial water supplies, including future demand.
83. There are complex hydrological interactions in the area between the rivers, ground water and the impacts of pumping etc. For example the builders of HS1 found that the Blue Lake (correct title of what is called Sawyers Lake on some plans) fell unexpectedly in level due to dewatering operations during construction, which impacted on water supply to industrial premises. Development in Eastern Quarry is changing how the water table is managed in that area. These interactions have potential implications for river flow, flood risk and ecology. Saline intrusion into the aquifer is another potential risk.
84. Northfleet Waste Water Treatment Works is at capacity and serves a large part of the urban area and down the A227 corridor in Gravesham. The Ebbsfleet Development Corporation has been looking at options with Southern Water Services to serve the Ebbsfleet development as part of their wider master planning process. A very clear strategy will be needed as to how waste water will be dealt with that is deliverable on the timescales suggested by the construction timetable. Unless major capital spend

is already committed it is difficult to see how the Resort timescales can be accommodated.

85. It may be noted that Gravesham Borough Council owns land in the vicinity of Northfleet WWTW.

#### **Soils and ground conditions (chap.18)**

86. The chapter outlines the known information about ground conditions. It highlights that parts of the site are contaminated. In the case of the CKD out on the Peninsula this is highly alkaline and therefore poses a significant risk to anyone coming in contact with or the groundwater. The long industrial legacy therefore means that it is not always clear what has been used as fill. As a site proposed to host thousands of people every day it is essential that any pollutants are either removed or dealt with in such a way as to isolate them from the surrounding environment.

#### **Waste and materials (chap.19)**

87. The Borough Council is not the waste authority (which is Kent CC) though it does collect both domestic and trade waste. The Resort has potentially significant implications during construction, with contaminated waste being a particular risk. Waste movement will have implications for the local highway network, especially before the direct link to the A2 is available in some form. The amount of waste when operational is a significant increase in the overall amount. For both construction and operation detailed plans will be needed of where waste is arising and where it is being disposed of (recycling/landfill/etc. as appropriate) and how it gets there.

#### **Greenhouse gases and climate change (chap.20)**

88. The Borough Council regards climate change as a very serious issue. On 25 June 2019 Council declared that there was a climate emergency and pledged to do what is possible within its powers and resources to make Gravesham carbon neutral by 2030. Table 20.4 should therefore be amended to reflect that decision, which is impacting on Borough Council policies and operations. It will be necessary for the applicant to show that the Resort is meeting that aim inside Gravesham Borough as well as across the development as a whole.
89. The objective of the scheme should be to minimise in design, construction and operation outputs that are instrumental in climate change. The science and technology of this topic are constantly evolving, so new opportunities and technologies may come forward. Tables 20.22-23 provide a summary of the current options, but these need to be turned into deliverable plans and implemented.
90. Adapting to climate change involves at design taking into account such issues as handling flood risk, more intense rainfall and higher summer temperatures.
91. An inherent problem with a large scale development of this type is that to operate it needs to attract a large number of people from a wider area. Although more sustainable travel modes can be encouraged by a range of means

#### **Cumulative effects (chap.21)**

92. The Resort by its very nature is not something that the Local Plans envisaged. The overall area has seen significant development, which is continuing, and it is essential that the development is seen in the overall context. The Local Authorities can supply schedules of significant planning permissions as well as allocations. It is however necessary to take into account the scales of development implied by the Governments Housing Objectively Assessed Need numbers that Local Planning Authorities are being asked to meet. Local Plans are at different stages of preparation so it is necessary to make allowance for what is yet to have formal allocation or planning permission. This is particularly relevant to transport modelling.

93. The most direct impact on the project will be emerging plans for development in the Ebbsfleet Central area, where advice should be obtained from the Development Corporation. Wider there are proposals like the Lower Thames Crossing which could have significant impacts but is not yet a consented scheme.
94. The Resort is of sufficient scale as to seriously impact on the base assumptions that have been made in preparing Local Plans and transport strategies. A range of scenarios will be need to be tested to understand how robust the proposals are and what the potential implications might be.

**21 September 2020**

## Appendix 1

### Detailed comments on PEIR chapters

#### Transport

1. Figure 9.14 - Fastrack B has now diverted through Springhead and map is incorrect <https://www.arrivabus.co.uk/find-a-service/b-from-gravesend-garrick-street-to-temple-hill-joyce-green-lane-terminus>
2. Figure 9.13/Table 9.4 - no International Services are currently running from Ebbsfleet and there were no afternoon departures to Paris or Brussels. Those would be required to attract International visitors by rail.
3. Figure 9.13 - should show Gravesend station as an important local interchange point for bus/rail/ferry services
4. The text description of rail services in Table 9.6 does not match with figure 9.14, which is significantly wrong. For both Northfleet and Swanscombe. 2 tph go to Gravesend and terminate (from London Victoria) as well as the 2 tph going forward to Rainham. This allows changing on to HS1 services to Faversham and beyond.
5. Table 9.9 makes reference to 2011 study which now out of date. Pre-COVID peak hour HS1 services from Ebbsfleet were full and standing so these trains at least were at capacity.
6. Note in diagram 9.3 the passenger figures for Ebbsfleet are for domestic passengers only.