

THE LONDON RESORT

The London Resort Development Consent Order

BC080001

Environmental Statement Volume 1: Main Statement

Chapter 1 - Introduction

Document reference: 6.1.1

Revision: 00

December 2020

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

Regulation 5(2)(a)

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Regulation 12(1)

[This page is intentionally left blank]

Chapter One ◆ Introduction

OVERVIEW

- 1.1 This document is the Environmental Statement (ES) for the London Resort ('the Resort' or 'the Proposed Development'). The ES has been prepared by technical consultants identified later in this chapter on behalf of London Resort Company Holdings Limited ('LRCH' or 'the Applicant').
- 1.2 The Resort will be a nationally significant visitor attraction and leisure resort, built largely on brownfield land at Swanscombe Peninsula in Kent on the south bank of the River Thames and with supporting transport and visitor reception facilities on the northern side of the river in Essex. Figure 1.1 of this ES (document reference 6.3.1.1) shows the regional context of the Proposed Development and figure 1.2 (6.3.1.2) shows the local context.
- 1.3 A detailed description of the Proposed Development is provided in chapter three of this ES. The focus of the Resort will be a 'Leisure Core' containing a range of events spaces, themed rides and attractions, entertainment venues, theatres and cinemas, developed in landscaped settings in two phases known as Gate One and Gate Two ('the Gates'). Outside the Gates will be a range of ancillary retail, dining and entertainment facilities in an area known as the Market.
- 1.4 The Resort will also include hotels, a water park connected to one of the hotels, a conference and convention centre known as a 'conferention centre', an e-Sports Coliseum, creative spaces, a transport interchange including car parking, 'back of house' service buildings, an energy centre, a wastewater treatment works and utilities required to operate the Resort. Related housing is also proposed to accommodate some of the Resort's employees.
- 1.5 Substantial improvements are proposed to transport infrastructure. This will include a new direct road connection from the A2(T) and a dedicated transport link between Ebbsfleet International Station, the Resort and a passenger ferry terminal beyond. The ferry terminal would serve visitors arriving by ferry on the River Thames from central London and Tilbury. A coach station is also proposed. On the northern side of the Thames to the east of the Port of Tilbury, additional coach and car parking and a passenger ferry terminal are proposed to serve the Resort.
- 1.6 The Proposed Development would involve an extensive restoration of land used in the past for mineral extraction, waste disposal and industrial activities including cement and paper production, with a comprehensive landscape strategy proposed incorporating the retention and enhancement of wildlife habitats.
- 1.7 The Project Site is 413.07 hectares (ha) in area. For clarity the section of the Project Site

to the south of the Thames is referred to in this ES as the 'Kent Project Site' and that to the north of the river is identified as the 'Essex Project Site'. The two sites are identified in figure 1.2 (document reference 6.3.1.2).

- 1.8 The Kent Project Site on the Swanscombe Peninsula and its transport connections to the south extend across the border between the boroughs of Dartford and Gravesham in Kent, and has a frontage on the River Thames. It has an area of 387.53 ha and lies mostly in the designated area of the Ebbsfleet Garden City, established in March 2015. The supporting transport and visitor facilities at Tilbury, in the unitary borough of Thurrock in Essex, would occupy a further 25.54 ha of land.

PROJECT STATUS

- 1.9 The Planning Act 2008 introduced a new consenting regime for a prescribed list of nationally significant infrastructure projects, under which infrastructure developers apply for a Development Consent Order (DCO) from the relevant Secretary of State, having first undertaken an extensive programme of consultation, environmental impact assessment (where required) and design refinement at the pre-application stage. Following a process of examination undertaken by the Planning Inspectorate, the application is passed to the Secretary of State for determination. Decisions are guided by a series of National Policy Statements (NPSs), approved in Parliament.
- 1.10 The London Resort Project does not meet the original criteria for a nationally significant infrastructure project (NSIP) under the Planning Act 2008. However, the Infrastructure Planning (Business or Commercial Projects) Regulations 2013 (the '2013 Regulations') widened the range of projects that can be consented under the 2008 Act to include a specified list of business and commercial developments, including major leisure projects that meet specified criteria.
- 1.11 In March 2014 LRCH wrote to the Secretary of State for Communities and Local Government (now Housing, Communities and Local Government) to request a direction under s.35 of the 2008 Act allowing the London Resort to be treated as development of national significance, for which a DCO is required. On 9 May 2014 the Secretary of State for Communities and Local Government issued a Section 35 Direction confirming that the London Paramount Entertainment Resort (now 'The London Resort') qualifies as a nationally significant business or commercial project for which development consent is required under the Planning Act 2008. LRCH is therefore applying to the Secretary of State for Housing, Communities and Local Government for a Development Consent Order (DCO), and has undertaken an EIA to help inform the Secretary of State's decision on this application.
- 1.12 Chapter 5: *Relevant law and policy* of this ES (document reference 6.1.5) identifies the law, policy and guidance relevant to the environmental impact assessment of the London Resort project.

ENVIRONMENTAL IMPACT ASSESSMENT AND THE 'ROCHDALE ENVELOPE'

- 1.13 Environmental impact assessment (EIA) is a process that aims to improve the environmental design of a development proposal and provide decision-makers with sufficient information about the likely significant environmental effects of implementing a project. For projects requiring development consent under the Planning Act 2008 and for which EIA is required, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations 2017') are applicable. These regulations set out the procedural requirements for undertaking an EIA.
- 1.14 The results of the EIA process are reported in an ES. Where required, an ES is normally submitted with an application for planning permission or development consent and provides environmental information about the scheme, including a description of the development and an assessment of the likely significant environmental effects of the construction and operation of the Project. In the current context the EIA process has iteratively informed the design development of the London Resort Project, and this ES sets out proposed mitigation measures to avoid, reduce or remediate potential adverse effects on the environment.
- 1.15 This ES is part of a suite of documents that accompanies the London Resort DCO application. It has been produced in compliance with the EIA Regulations 2017. A full description of the DCO application documents is provided in the Applicant's *Guide to the Application* (document reference 1.4) submitted with the DCO application.

The Rochdale Envelope

- 1.16 For practical reasons LRCH wishes to maintain flexibility about the detailed design of certain elements of the Proposed Development, including the content of Gates One and Two. At the same time, LRCH acknowledges the essential need to provide sufficient information about the project to ensure that the assessment clearly assesses the worst-case scenario and, if required, the assessment of trans-boundary effects and the Habitat Regulations Assessment, in order to identify any likely significant effects and report on these in this ES. The EIA has been undertaken in accordance with what are known as 'Rochdale Envelope' principles.
- 1.17 These principles allow a certain degree of flexibility in DCO applications and are explained in Planning Inspectorate Advice Note Nine: *Using the 'Rochdale Envelope'* (version 3, July 2018). Rochdale Envelope principles are explained at the beginning of chapter 3: Project Description of this ES (document reference 6.1.3). In summary there are parts of the Proposed Development for which flexibility is sought in the DCO application, and for which the EIA has employed Rochdale parameters. This is the case for development inside Gates One and Two at the heart of London Resort. From time to time LRCH will need to replace rides and attractions in keeping with changing customer tastes and expectations.
- 1.18 The Applicant has ensured that those design details in which there might be continuing

public interest are the subject of safeguarding DCO ‘Requirements’ - similar to the planning conditions that attach to a conventional planning permission - so that such details can be submitted for approval to the relevant planning authority at a local level, once the DCO is made.

EIA SCOPING

- 1.19 LRCH applied to the Secretary of State for an opinion on the scope of the London Resort EIA in November 2014 (EIA Scoping Report 2014. document reference 6.2.1.1). The Secretary of State’s Scoping Opinion followed in December 2014 (document reference 6.2.1.2). LRCH’s project team took the Scoping Opinion 2014 into account in subsequent assessment work but over time there were various changes in circumstances that led LRCH, in consultation with the Planning Inspectorate (PINS), to conclude that the EIA scoping opinion issued in 2014 should be refreshed. These included the following.
- **Project evolution** – the proposals had evolved considerably since 2014 and included land at the Port of Tilbury that was not taken into account in the original scoping report and opinion.
 - **Regulations** – the 2014 EIA Scoping Report was submitted under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2012, and the EIA Regulations 2017 introduced additional requirements for the EIA process, including provisions for the consideration of alternatives, human health, climate change and the risks of major accidents and disasters.
 - **Changed circumstances** - the local environmental baseline has evolved considerably since 2014, with substantial new development taking place through the Ebbsfleet Garden City initiative and other infrastructure projects coming forward, including the Tilbury2 port expansion for which a DCO was made in February 2019, Thurrock Flexible Generation Plant, which was accepted for examination in June 2020 and Highways England’s proposals for the Lower Thames Crossing, a DCO application for which is imminent at the time of writing.
- 1.20 A revised EIA Scoping Report was submitted to the Secretary of State in June 2020 (document reference 6.2.1.3). This Scoping Report took into account the Secretary of State’s 2014 scoping opinion for the project and consultation feedback provided then and since by consultees including local authorities, statutory agencies, affected communities and other interests. The Scoping Report also considered the revised site area, taking into account the Essex Project Site in addition to the previously considered Kent Project Site. The Secretary of State’s updated Scoping Opinion was published on 28 July 2020 (document reference 6.1.5) and the ES has been prepared in accordance with the Scoping Opinion. The response to the Planning Inspectorate’s comments and those from prescribed consultees is provided in the introductory sections of each of the environmental topic-based chapters of this ES.

CONSULTATION

- 1.21 Pre-application consultation is a legal requirement for DCO applications. It allows issues and concerns to be raised and considered when a proposed development is still at a formative stage and, where appropriate, assists an applicant to address adverse environmental effects through avoidance, design or mitigation before the DCO application is submitted for examination by the Planning Inspectorate.
- 1.22 Pre-application consultations undertaken for the London Resort project are described in a *Consultation Report* (document reference 5.1) that accompanies the DCO application. The Consultation Report records extensive engagement with government agencies, local authorities and other interested parties on the environmental effects of the Proposed Development. It also explains how LRCH has responded to specific consultation responses in the preparation of the current DCO application. A further account of how the Proposed Development responds to pre-application consultation feedback is provided in the introductory sections of each of the environmental topic-based chapters of this ES.

THE APPLICANT AND PROJECT TEAM

London Resort Company Holdings

- 1.23 LRCH is a UK-registered company established specifically to promote the Project. It is led by a London-based management team with considerable experience of delivering and operating some of the world's largest leisure, sports and entertainment developments, and is supported by international investors. LRCH has entered into licence agreements with UK and international film and television studios and is working closely with these partners to develop high quality and innovative themed attractions in the resort.

The project team

- 1.24 According to Regulation 14(4)(a) of the EIA Regulations 2017:

(4) In order to ensure the completeness and quality of the environmental statement—

(a) the applicant must ensure that the environmental statement is prepared by competent experts; and

(b) the environmental statement must be accompanied by a statement from the applicant outlining the relevant expertise or qualifications of such experts.

- 1.25 The EIA was undertaken by competent experts with the relevant and appropriate experience in their respective topics. LRCH's EIA team for the London Resort project comprises the specialist consultants identified in table 1.1. In accordance with the requirement of the Regulations to demonstrate competency, the professional particulars

of the specialists responsible for the EIA are identified in Table 1.1 at the end of this chapter.

REPORT STRUCTURE

1.26 This ES is structured as follows.

- **Chapter two** (document reference 6.1.2) provides a description of the Project Site.
- **Chapter three** (document reference 6.1.3) provides a description of the Proposed Development.
- **Chapter four** (document reference 6.1.4) provides a summary of the evolution of the project and the assessment of alternative sites and master-planning approaches that LRCH undertook at the pre-application stage.
- **Chapter five** (document reference 6.1.5) summarises the legal and regulatory provisions and the national and local planning policy relevant to the assessment of the project's environmental effects.
- **Chapter six** (document reference 6.1.6) outlines the agreed scope of the EIA and the general methodology, including the approach to the assessment of in-combination, cumulative and transboundary effects.
- **Chapters seven to twenty** describe the assessment of individual environmental topics, including baseline environmental conditions, likely significant environmental effects and the measures being proposed to avoid, minimise or mitigate any adverse effects. These chapters and their document reference numbers are as follows.

7. *Land use and socio-economic effects* (6.1.7)
8. *Human health* (6.1.8)
9. *Land transport* (6.1.9)
10. *River transport* (6.1.10)
11. *Landscape and visual effects* (6.1.11)
12. *Terrestrial and freshwater ecology and biodiversity* (6.1.12)
13. *Marine ecology and biodiversity* (6.1.13)
14. *Cultural heritage and archaeology* (6.1.14)
15. *Noise and vibration* (6.1.15)
16. *Air quality* (6.1.16)
17. *Water resources and flood risk* (6.1.17)
18. *Soils, hydrogeology and ground conditions* (6.1.18)
19. *Waste and materials* (6.1.19)
20. *Greenhouse gases and climate change* (6.1.20)

- **Chapter twenty-one** (document reference 6.1.21) describes the assessment of in-combination, cumulative and transboundary effects.
- **Chapter twenty-two** (document reference 6.1.22) provides the conclusion to the EIA and sets out the mitigation commitments.

1.27 A **Non-technical summary of the ES** (document reference 6.4) is also available. This is intended to be accessible by a range of audiences, providing them with a clear outline of the London Resort, the likely significant environmental effects and subsequent mitigation strategies to avoid or lessen the potential adverse impacts.

1.28 Full lists of ES figures, tables and appendices are provided in the frontispiece to this ES (document reference 6.1.0), along with a glossary of technical terms.

Table 1.1: The Applicant’s EIA team for the London Resort project

Responsibility	Lead assessor	Professional qualifications
1 – 6 (Introduction, Site description, Project description, Project development and alternatives, Relevant law and policy, assessment methodology)		
Savills	Karl Cradick	BA(Hons), MSc, MRTPI
Savills	Erin Banks	MEnvSci (Hons), MIEMA, CEnv
7. Land use and socio-economic effects		
Volterra	Ellie Evans	BA(Hons), MIED
Volterra	Alex O’Byrne	BSc
8. Human health		
Volterra	Ellie Evans	BA(Hons), MIED
Volterra	Alex O’Byrne	BSc
9. Land transport		
WSP	Darren Oldham	MSc, MCIHT, CMILT
WSP	David Dixon	MSc, MCHIT

Responsibility	Lead assessor	Professional qualifications
WSP	Laura Bluh	BA(Hons), MCIHT, CMILT
WSP	Filip Imramovsky	MSc, MCIHT
10. River transport		
WSP	Stephen Horne	BEng(Hons)
11. Landscape and visual effects		
EDP	Fiona McKenzie	MA (Cantab) Geography, MA Landscape Design, CMLI, MArborA, AIEMA
EDP	Owain Keeley	BSc (Hons), MSc, CMLI
12. Terrestrial and freshwater ecology and biodiversity		
EDP	Tom Wigglesworth	BSc (Hons), MSc, CIEEM
EDP	James Bird	BSc (Hons), CIEEM
13. Marine ecology and biodiversity		
EDP	Marc Hubble	BSc(Hons), PhD
EDP	Rachel Antill	BSc (Hons), MSc, PIEMA
14. Cultural heritage and archaeology		
Wessex Archaeology	Marie Kelleher	BA (Hons), MCIfA
Wessex Archaeology	Mark Turner	BA (Hons), MCIfA
15. Noise and Vibration		
Buro Happold	Daniel Hawe	MSc
Buro Happold	Matthew Harrison	BEng (Hons), CloA
16. Air Quality		
Buro Happold	Peter Henshaw	BSc (Hons), MSc, CSci

Responsibility	Lead assessor	Professional qualifications
Buro Happold	Connor Rusby	BSc
17. Water resources and flood risk		
Buro Happold	Paul Norman	BSc, MSc
Buro Happold	Nilani Venn	MSci, MSc, C.WEM, CEnv, MCIWEM
18. Soils, hydrogeology and ground conditions		
Buro Happold	Georgina Sopp	MSc
Buro Happold	Hugh Mallett	BSc (Hons), MSc
19. Waste and materials		
Buro Happold	Anne Christie	BA, MSc
Buro Happold	Lukas Schaefer	BA, MSc
20. Greenhouse gases and climate change		
Buro Happold	Tom Peacock	MSc, BSc, PIEMA
Buro Happold	Georgina Chamberlain	MPhil (Cantab), MEng, CEng
21. Cumulative, in-combination and transboundary effects		
Savills	Charlotte Niccolls	BA (Hons), CEnv
Savills	Erin Banks	MEnvSci (Hons), MIEMA, CEnv
22. Conclusion and mitigation commitments		
Savills	Karl Cradick	BA(Hons), MSc, MRTPI
Savills	Erin Banks	MEnvSci (Hons), MIEMA, CEnv