

THE LONDON RESORT

The London Resort Development Consent Order

BC080001

Environmental Statement Volume 1: Main Statement

Chapter 7 – Land use and socio-economic effects

Document reference: 6.1.7

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 Seven ◆ Land use and socio-economics

INTRODUCTION

- 7.1 This chapter of the Environmental Statement (ES) presents the results of the assessment of the range of likely significant socio-economic effects that are likely to be generated by the construction and operation of the London Resort.
- 7.2 This ES chapter:
- defines the scope of the assessment;
 - includes a summary of stakeholder consultation to date;
 - sets out the assessment methodology;
 - describes the existing environment;
 - discusses the assessment of potential effects and possible mitigation measures; and
 - provides a cumulative effects assessment (CEA).
- 7.3 This assessment identifies temporary and permanent, beneficial and adverse, direct, indirect and induced effects on residents, community facilities and social infrastructure, public services and public open space, business, employment, skills and the labour market, and the wider economy as a result of the construction and operation of the London Resort.
- 7.4 This chapter presents the assessment of significant effects and identifies appropriate mitigation measures to reduce certain adverse effects. It also takes into account measures proposed by the Applicant to secure positive social and economic outcomes from the London Resort. The chapter discusses all scoped-in socio-economic effects (Table 7.3 provides the full list of effects assessed). Both significant and non-significant effects are identified, but the chapter focuses on providing more detail on the residual effects that are concluded to be significant, with short summaries provided for non-significant effects. More detail on the assessment of non-significant effects is contained in Appendix 7.4: *Non-significant effects* (document reference 6.2.7.4).
- 7.5 Some effects are considered across various timescales and study areas (Table 7.8 provides details of temporal and spatial scope for all effects) and result in both significant and non-significant outcomes. For these, the entire effect is discussed in detail within the chapter, with Appendix 7.4: *Non-significant effects* (document reference 6.2.7.4) summarising the outcomes.

Supporting documents

- 7.6 This assessment is supported by the following documents:
- Appendix 7.1: *Policy* (document reference 6.2.7.1) – a summary of the relevant policy

and guidance measures is provided within this chapter. This appendix provides further detail on applicable policy and guidance for the assessment of effects.

- Appendix 7.2: *Detailed Methodology* (document reference 6.2.7.2) – a full description of the approach taken to the assessment. Details how the consultation undertaken is considered within the determination of impacts.
- Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) – a detailed description of information considered within the assessment of the baseline conditions for the purposes of this chapter.
- Appendix 7.4: *Non Significant Effects* (document reference 6.2.7.4) – more detail on the non significant effects found in the main chapter.
- Appendix 7.5: *Staffing Technical Note* (document reference 6.2.7.5) – a technical appendix produced by Leisure Development Partners (LDP) who estimated employment at the London Resort.
- Appendix 7.6: *Attendance Technical Note* (document reference 6.2.7.6) – a technical appendix produced by LDP which provides the methodology for the attendance estimates at the London Resort.
- Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7) – an evolving strategy to maximise the employment and skills benefits of the London Resort.
- Appendix 7.8: *Construction Workforce Accommodation Strategy* (document reference 6.2.7.8) – a strategy to minimise the impact of non-home based construction workers on the local accommodation market.
- Appendix 7.9: *Retail and Leisure Impact Assessment* (document reference 6.2.7.9) – an assessment the effects of the London Resort on local retail and leisure provision, including centres.
- *Economic and Regeneration Statement* (document reference 7.5) – an assessment of the economic impact of the London Resort during construction and operation.

METHODOLOGY AND DATA SOURCES

Scoping

- 7.7 As Chapter 1: *Introduction* (document reference 6.1.1) explains, the Applicant submitted an EIA Scoping Report to PINS in June 2020 (document reference 6.2.1.3), in order to secure an update to a Scoping Opinion issued in 2014. Appendix 7.2: *Detailed Methodology* (document reference 6.2.7.2) summarises the 2014 Scoping Opinion. The Secretary of State’s Scoping Opinion was published on 28 July 2020 (document reference 6.2.1.4). The table below provides a summary of the advice offered in the 2020 EIA Scoping Opinion along with the reference to where the relevant matters are addressed in this chapter of the ES.

Table 7.1 The Secretary of State’s advice on socio-economic effects in the 2020 scoping opinion and the Applicant’s response

Scoping opinion advice	Applicant’s response and reference
<p>4.1.2 – Study areas The Scoping Report states that the baseline information would be assessed within the study areas presented in Table 7.5 but does not explain which impacts would be considered within each study area. The ES should provide a justification for the geographical extent of the study areas used in the assessments and why they are appropriate for the impact under consideration.</p>	<p>Table 7.5 displays study areas and provides justification for their use in each effect. Table 7.8 lists all effects in full and their study areas.</p>
<p>4.1.3 - Receptors The Scoping Report is unclear in defining how receptors will be identified and over what geographic scale. The ES should explain which receptors have been considered in the assessment applicable to the relevant study area, their sensitivity and the extent of the likely impact. The Applicant should make effort to agree the receptors with relevant consultation bodies.</p>	<p>Table 7.4 expands on which receptors are relevant for each effect and a summary of the sensitivities for each effect (including the associated study area and receptor(s)) is listed in Table 7.30. The receptors were discussed with consultation bodies.</p>
<p>4.1.4 - Assessment of operational effects The ES should explain assumptions applied to the assessment, particularly those applicable to predicted visitor numbers.</p>	<p>Information on the assumptions made, along with their basis, is contained in each operational effect. Detailed information explaining the basis for, and assumptions underlying, predicted visitor numbers is outlined in Appendix 7.6 <i>Attendance Technical Note</i> (document reference 6.2.7.6)</p>
<p>4.1.5 – Consultation with European Economic Area states The Applicant is referred to the Inspectorate’s Advice Note 12 on Transboundary Impacts and Process.</p>	<p>AN12 is taken into account in Chapter 21: <i>Cumulative, in-combination and transboundary effects</i> (document reference 6.1.21).</p>
<p>4.1.6 - Cumulative effects The Scoping Report states that the assessment will be based on future projections of population and employment and so will be an inherently cumulative assessment, meaning that a separate cumulative effects assessment would be double counting. It is difficult to determine from the description of the assessment methodology in the Scoping Report if this is really the case since the Scoping Report refers to baseline data and receptors which may be used rather than being definitive. The ES should explain the range of impacts that are being considered and justify why the assessment for each is considered to be ‘inherently cumulative’. For impacts where this cannot be done a cumulative effect assessment should be undertaken, where significant effects are likely to occur.</p>	<p>Information on the approach is contained in 7.397. The projections for population, employment and housing do not capture all changes in socio-economic conditions, such as demand for construction workers or change in public services. To account for this, data are presented on the expected changes as a result of future developments, where available projections do not account for these changes.</p>

Scoping opinion advice	Applicant’s response and reference
<p>4.1.7 – Mitigation The Scoping Report does not provide any detail on the mitigation proposed except to say that the chapter will outline measures to maximise the local benefits of the Proposed Development particularly in relation to local jobs and spending. Mitigation is usually defined as measures which avoid or reduce the adverse effects of a project. The ES should make a clear distinction between measures intended to mitigate effects and those intended to offer enhancement.</p>	<p>The proposed additional mitigation and enhancement section of this chapter sets out the proposed mitigation and enhancement measures and clearly distinguishes between which are mitigation measures and which are enhancement.</p>

Engagement

7.8 In 2014/15 LRCH carried out several stages of public consultation, including a first round of statutory consultation. These included public exhibitions, extensive web-based information and a series of targeted workshop events. These focused on topics including job opportunities, employment and skills; tourism, business and regeneration impacts; construction and supply chains. After these events, the Applicant engaged with various groups and individuals which had been identified during, and prior to, these events. These included representatives from local charities, work programmes and educational institutions. Specific meetings were also held with The Learning Shop at Bluewater, for example, to understand its work programmes and initiatives.

7.9 Engagement with local authorities and the EDC¹ also took place on a range of socio-economic considerations including temporary workforce accommodation during construction, visitor numbers, employment and skills, supply chain, retail and leisure impacts. Matters arising from these included the following:

- The need to ensure that as much detail as possible was included within the application so that the impacts could be understood clearly;
- The importance of considering different scenarios (best/worst case) where uncertainties existed;
- The importance of consultation on key issues so that local concerns, objectives and recommendations could be taken into consideration;
- Concerns were raised that the local construction workforce might not have the capacity to serve most of the construction demands of the proposals, especially once cumulative schemes are considered; and
- As the locality is undergoing so much change, the importance of considering

¹ When referencing consultation with EDC, this was undertaken both with Arcadis on behalf of EDC as well as direct consultation with EDC.

cumulative impacts along with other known developments and plans for the area was highlighted.

- 7.10 Technical engagement has been undertaken with prescribed and non-prescribed consultation bodies in relation to socio-economics.

Local authorities and EDC

- 7.11 The Applicant engaged with all the host authorities and EDC to discuss key socio-economic aspects of the project. This chapter has been informed through that engagement. The engagement addressed many socio-economics topics and some key themes included:

- concern over potential retail and leisure impacts of the proposals, particularly on existing town centres;
- the need to provide more information on the approach to the cumulative assessment (particularly with respect to the construction phase);
- the temporary effects of construction workforce on the accommodation market;
- the direct and indirect impact of the London Resort on housing;
- the displacement of employment uses (including the ‘bad neighbour’ uses) on site;
- the need for more detail on the employment opportunities and associated skills requirements; and
- the need to work with them and the partner employment organisations to develop the employment and skills offer.

- 7.12 Engagement will continue following submission of the DCO application to develop the approach to employment and skills. Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7) is submitted in draft and will evolve following these discussions.

The London Resort Employment and Skills Taskforce

- 7.13 The Applicant’s strategy to maximising the local jobs and skills associated with the London Resort is contained in Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7). The London Resort Employment and Skills Taskforce² which includes representatives from local authorities, skills and education partners, schools, colleges and high education – has been formed to provide guidance on the development of this strategy. The taskforce has already helped in bringing together schools, colleges and

² Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7) contains more information on the Employment and Skills Taskforce including members and terms of reference.

higher education providers in a series of workshops (as described in the strategy) which have informed the emerging education proposals outlined in the Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7). Ongoing discussion with the taskforce and other stakeholders will inform Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7) prior to its finalisation.

7.14 Engagement will continue following submission of the DCO application to develop the approach to employment and skills. Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7) is submitted in draft and will evolve following these discussions.

Community liaison group

7.15 The Applicant presented to the community liaison group on employment and skills to understand local views.³ Some key aspects of discussion included: continuing to discuss and share information with schools and education partners, ensuring that job opportunities on the Essex Project Site are maximised, working with schools and partners to ensure work readiness, and working with existing community groups and job programmes.

Other stakeholders

7.16 The Applicant has met with various local partners and stakeholders such as Locate in Kent, Visit Kent, The Education People and the South East Local Enterprise Partnership (SELEP) to discuss socio-economic aspects. This engagement has informed this assessment. For example, Locate in Kent and Visit Kent have provided information on the local accommodation market and future pipeline (sources can be found in Table 7.10).

Section 42 consultation

7.17 This section summarises the Section 42 consultation responses relevant to socio-economics. It describes the key themes and how they have been addressed in this chapter.

Table 7.2 S42 consultation themes relating to socio-economics and the Applicant’s response

Theme from the S42 consultation	The Applicant’s response
Concern about the influx of construction workforce on the level of accommodation in the area.	The effect of the non-home based construction workforce on the temporary accommodation market has been considered in this chapter and in Appendix 7.8: <i>Construction Workforce Accommodation Strategy</i> (document reference 6.2.7.8)

³ The Applicant established the community liaison group. Membership comprises of around 20 local elected representatives and community groups, to provide a forum for discussion, information provision and feedback. The Consultation Report (document reference 5.1) provides more information on the group.

Theme from the S42 consultation	The Applicant's response
Impact of the London Resort on the delivery of employment and housing land.	This chapter considers the effect on housing delivery as a result of the construction works/land take. It also considers the effect of displacing employment land.
Need to consider the impact of the displacement of existing businesses onsite, particularly given the existence of bad neighbour uses. Consultees requested that the assessment consider the impact of the loss of these businesses on local communities in terms of employment, the services they provide and the businesses themselves.	This chapter considers the effect of the displacement of the businesses. It considers the potential loss of employment, the impact on the businesses themselves, and the impact of the loss of services for the residents. It considers the extent of these businesses which are 'bad neighbour' uses and what impact that would have on local industrial capacity in the context of industrial trends.
Concern that the London Resort would place pressure for more housing growth and affordable housing. Some consultees noted that more data was needed to understand the local housing market and the severity of the housing pressures in different areas. Concerns were raised that these existing pressures could mean that the additional demand from the London Resort could have a significant effect on the ability to access new and existing housing. This should also consider impacts on the housing market as a result of increased short stay lets.	This chapter considers the effect of workers and visitors on the local housing market, both in terms of workers potentially moving to the area and visitors increasing demand in the area through short term lets. Additional information is considered in the housing baseline to understand the local housing market and indicate what and where there are housing pressures in the CSA.
More information required to understand how the London Resort would maximise employment and skills. Consultees also emphasised the need to engage with local schools, colleges and universities.	Appendix 7.7: <i>Outline Employment and Skills Strategy</i> (document reference 6.2.7.7) has been developed and is submitted with the DCO application. The strategy – which is briefly summarised in this chapter – outlines the Applicant's approach to maximising the local work and training benefits of the London Resort and the engagement that has taken place with a variety of local stakeholders. In developing that strategy, the Applicant has also set up an Employment and Skills Taskforce which is a group of relevant local bodies which will continue to meet to provide guidance on the implementation of the Employment and Skills proposals.
The impact on local town centres in terms of retail and leisure should be assessed. This should consider theatres and social facilities. It should also consider the impact on planned new retail and leisure floorspace, particularly in EGC and at Bluewater shopping centre.	This chapter considers the effect of the London Resort on retail and leisure. It considers the impact on town centres and other local destinations, including theatres.
Ensuring the cumulative assessment takes account of all the cumulative effects, including the impact on local social infrastructure and the demand for	Table 7.2.12 in Appendix 7.2: <i>Detailed Methodology</i> (document reference 6.2.7.2) summarises whether the assessment is

Theme from the S42 consultation	The Applicant’s response
construction jobs. The chapter should also be clear where the assessment is inherently cumulative, and what is done when it is not.	inherently cumulative for each effect. Where it is not, more information is provided in the relevant future baseline to assess the cumulative impact. Table 7.3.12 in Appendix 7.3: <i>Detailed Baseline</i> (document reference 6.2.7.3) specifically considers the cumulative demand for construction jobs, for example.

Scope of this chapter

7.18 Table 7.3 outlines the potential effects of the London Resort by phase of development. An additional effect - the potential temporary or permanent displacement of residential dwellings as a result of property acquisition - which was not scoped into the 2020 Scoping Report, has since been added. The section then summarises the receptors, spatial and temporal scope over which potential effects are assessed, justifying their application in the effects for which they are used. Table 7.8 at the end of this section displays all effects (grouped by activity) and their assessment scope.

Table 7.3 Potential land use and socio-economic effects of the London Resort during construction and operation

Construction	Operation
Potential temporary effect of employment generation and effects on businesses in the supply chain	Potential effects associated with net additional employment (including indirect and induced effects, and characteristics of jobs generated by the project)
Potential temporary effect of employment on the labour market, skills and training	Potential effects of new employment on skills and training
Potential temporary effect of the construction workforce on crime levels	Potential effects of trade creation and diversion relating to theme parks
Potential temporary effect of the construction workforce on local healthcare	Potential effects of visitors and workers on local accommodation options and the housing market
Potential temporary effect of employment generation on the accommodation market (including private rented and short-term accommodation)	Potential effects of visitor and worker expenditure
Potential temporary or permanent displacement / loss of businesses and other services	Potential effect of workers and visitors on healthcare provision
Potential temporary or permanent displacement / loss of community uses, such as open spaces, public rights of way and routes, and other recreational or community facilities	Potential effect of workers and visitors on other public services
Displacement of a single residential building comprising three dwellings as a result of property acquisition	Potential effect on local retail and leisure, including town centres

Construction	Operation
Potential temporary or permanent disruption to housing delivery as a result of the land take and construction works	

Note: no inferences about the scale, significance or timing of potential effects should be inferred from the order in which effects are listed in the table

Receptors

7.19 The receptors listed below might experience significant effects as a result of the construction and operation of the London Resort. Appendix 1.3: *EIA Scoping Report – LRCH June 2020* (document reference 6.2.1.3) identified three receptors (residents, housing market and businesses). This assessment expands the receptors to include three further categories (visitors, employment, skills and training providers, and community facilities) that are likely to be affected by the London Resort.

Table 7.4 Definition of the receptors considered in the land use and socio-economic assessment

Receptor	Description
Businesses	Owners of businesses and property, both within and surrounding the Project Site, who experience changes in the environment, including the activity and employment (workers) supported by these businesses
Residents	Residents who experience changes in their living environment
Visitors	Visitors who experience changes to their tourist destinations
Employment, skills and training providers	Local schools, colleges, universities and training providers, and the people who access their education and skills offerings
Homes	The stock of homes in the housing market (including private rented, short-term accommodation and visitor accommodation) and the people who reside in them
Community facilities	Community facilities (including open space and public rights of way) and the people who use them

Spatial scope (study areas)

7.20 The table below outlines the various geographical study areas used in this assessment, either as direct study areas or geographical comparators. These are identified in Diagram 7.1. Whilst consistent with the study areas detailed in Appendix 1.3: *EIA Scoping Report – LRCH June 2020* (document reference 6.2.1.3), these have been expanded in order to appropriately capture effects at different spatial levels.

7.21 The spatial scope may vary widely, dependent on the nature of the effect. Effects on the receptors identified will be possible at the local, sub-regional and national levels. Study areas have been informed using professional judgement on the geographical extent of

where potentially significant socio-economic effects may be reasonably expected to occur as a result of the London Resort. The study area does not necessarily capture where the receptor originates from, rather it indicates where the socio-economic effect is expected to occur. For example, businesses expected to be displaced as a result of the London Resort would be within the Project Site Boundary (PSB), but the people who work at these businesses are unlikely to live within this immediate study area as there are few residential properties within it.

Table 7.5 Geographical study area definitions and rationale

Geographical study area	Definition and use
The Project Site Boundary (PSB)	The DCO Order Limits. Used to assess effects which happen at the Project Site level.
Community Impact Area (CIA)	A 500m radius around the PSB. Used to assess community effects, since this is where the most affected community uses are likely to be located. *
Dartford	The boundary of Dartford local authority. Used to assess housing displacement effects (as a result of compulsory acquisition), since this is the area over which housing targets are set.
Core Study Area (CSA)	Dartford, Gravesham and Thurrock (local authorities), the three local authorities that the Project Site falls within. Many of the effects are expected to be experienced at CSA level.
Sub-Regional Context Area ⁴ (SRCA)	Kent and Medway, Essex (combination of districts), used for baseline assessment context.
Labour Catchment Area (LCA)	A 60-minute travel time (car or public transport) to the Project Site, ⁵ used for employment effects since this is considered a reasonable time in which workers would commute to the site. ⁶
Regional Context Area (RCA)	South East, East and London. Predominantly used for context but used as an assessment study area for the trade diversion effect because the majority of other top theme parks in the UK are also located within the RCA.
National Area	England, GB, UK (depending on data source availability), predominantly used for context but used as a study area for the trade creation effect since the theme park will compete on a global scale.

**Note: The CIA does not precisely correspond to a 500m radius around the PSB as at the point of submission. It is slightly larger than a 500m radius. During statutory consultation, some stakeholders stated that this boundary should be no smaller than that defined for the PEIR to ensure all potential effects on community facilities and public services are captured within the study area. Therefore,*

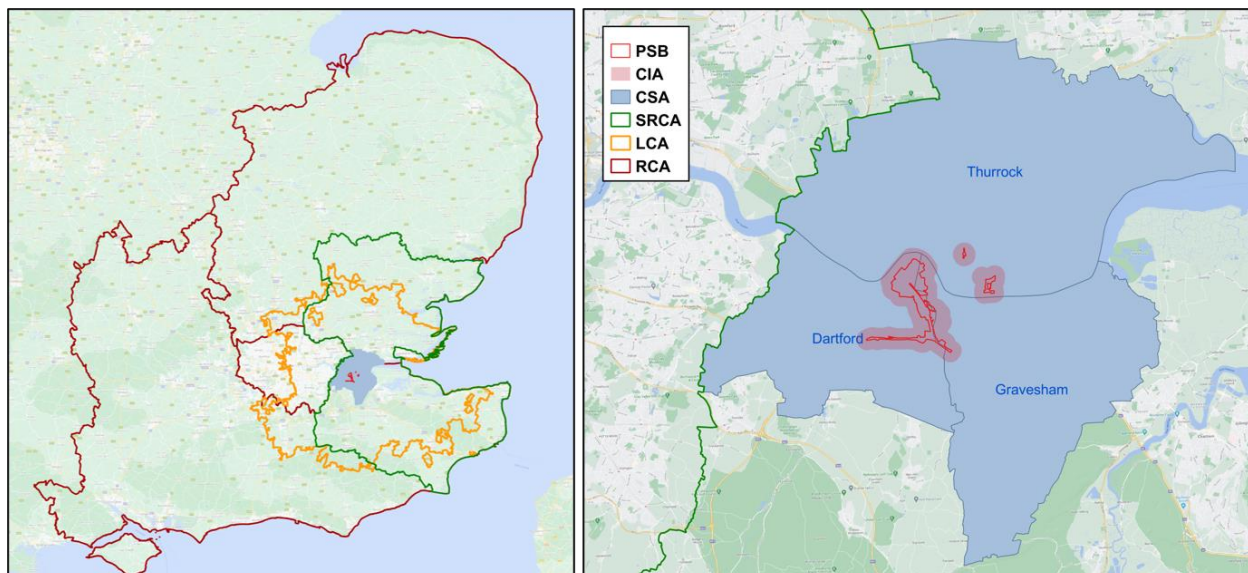
⁴ Defined as county / unitary authorities to be consistent with ONS statistical data releases.

⁵ Travel time data for car and transit modes of travel are sourced from the Google Maps distance matrix API. For PT travel times, Ebbsfleet International or Tilbury (whichever is closer for each MSOA) is taken as the end point of the journey. It has then been assumed that the onward transfer from Ebbsfleet and Tilbury to the site will take 10 minutes. These assumptions have been made in order to provide more realistic commutable labour market zones for consideration, because the travel time from both Ebbsfleet and Tilbury to the site will be considerably improved in the Future Baseline as a result of the scheme. The simplistic assumptions made here are illustrative but likely to be materially appropriate for these purposes.

⁶ Research by CIPD found that 90% of national employees commuted for 60 minutes or less each way. CIPD, 2018, Employee views on working life.

although the PSB has marginally decreased in area since the PEIR was published, the CIA study area has been kept the same.

Diagram 7.1 Study areas used for the purpose of this socio-economic analysis



Contains Ordnance Survey data © Crown copyright and database right 2019

Temporal scope (assessment years)

7.22 The London Resort will be delivered over two phases of construction, with an operational phase of Gate One starting an estimated five years before the end of the construction activities for Gate Two. The proposed timescales are shown in the table below.

Table 7.6 The London Resort: indicative timescales

Phase	Construction phase	Operational phase
Gate One	2022 – 2024	2024 onwards
Gate Two	2026/27 - 2029	2029 onwards

7.23 Table 7.7 outlines the temporal scope that will be considered in this assessment. Gate One is expected to become operational in 2024 and Gate Two is expected to be operational in 2029. Several core assessment years have been chosen for this assessment due to the phased approach to construction. For the purposes of this assessment, the operational phase will be defined as a single continuous phase, with three core assessment years.

7.24 The temporal scope will vary depending on the nature of the effect. The assessment establishes parameters that are likely to result in the maximum adverse effect (i.e. the worst-case scenario). For example, displacement of businesses and community uses is

expected to occur during the construction phase (2022 – 2024) and therefore 2022 is considered as the worst case for this effect, as that is the earliest they could be displaced. The assessment year could also be a specific point in time when something relevant occurs that affects the assessment - for example the opening of Gate Two or the maturity of attendance to the whole London Resort.

Table 7.7 Temporal scope – assessment years used for the socio economic assessment

Assessment year	Explanation
Construction phases	
2022	The earliest year in the construction phase – used as a worst case for displacement effects.
2023	The construction of London Resort Gate One will be rapid, to achieve an opening date in 2024. For this reason, it is envisaged that the number of construction workers required on site will peak and remain broadly constant at this sustained peak from mid-2022 to mid-2024. The year 2023 is therefore used to assess effects related to the construction workforce as this is the year in which the highest number of construction workers are anticipated to be on site.
2028	The Gate Two construction period is due to begin 2026/2027 until 2029. Given the short time frame, it is envisaged that the number of workers on site will be broadly consistent throughout the period. 2028 is used to assess effects related to the construction workforce, as this is the year in which the highest number of construction workers are anticipated to be on site during the construction of Gate Two.
Operational phase	
2025	The first full calendar year of Gate One operations.
2030	The first full calendar year of Gate Two operations.
2038	Maturity – the London Resort will be fully operational and established.

Identification of potential effects and scope over which they are assessed

7.25 The following table summarises the above information, showing the receptors, study area and temporal scope for each potential effect.

Table 7.8 Potential socio-economic effects and the receptors, spatial and temporal scope for the socio economic assessment

Activity	Effect	Receptor(s)	Study Area	Temporal Scope
Potential construction effects				
Temporary construction employment and supply chain	Potential temporary effect of employment generation and effects on businesses in the supply chain	Residents; Businesses	LCA National	2023
	Potential temporary effect of employment on the labour market, skills and training	Residents; Employment,	CSA	2022-2029

Activity	Effect	Receptor(s)	Study Area	Temporal Scope
		skills and training providers		
	Potential temporary effect of the construction workforce on crime levels	Residents; Businesses	CSA	2023 2028
	Potential temporary effect of the construction workforce on local healthcare	Residents	CIA	2023
	Potential temporary effect of employment generation on the accommodation market (including private rented and short-term accommodation)	Homes; Residents	CSA	2023 2028
Displacement to land and property as a result of the land take	Potential temporary or permanent displacement / loss of businesses and other services	Residents; Businesses	PSB CSA	2022
	Potential temporary or permanent displacement / loss of community uses, such as open spaces, public rights of way and routes, and other recreational or community facilities	Community uses (and their users)	PSB CIA	2022
	Displacement of residential dwellings as a result of property acquisition	Homes; Residents	Dartford	2022
	Potential temporary or permanent disruption to housing delivery as a result of the land take and construction works	Homes; Residents	Dartford	2022
Potential operational effects				
Employment generation	Potential effects associated with net additional employment (including indirect and induced effects, and characteristics of jobs generated by the project)	Businesses	CSA LCA National	2025 2030 2038
	Potential effects of new employment on skills and training	Residents; Employment, skills and training providers	CSA	2025 2030 2038
Visitor generation	Potential effects of trade creation and diversion relating to theme parks	Businesses	National RCA	2025 2030 2038
Visitors and workers	Potential effects of visitors and workers on local accommodation options and the housing market	Homes; Residents; Businesses; Visitors to Kent	CSA	2025 2030 2038
	Potential effects of visitor and worker expenditure	Businesses	CSA	2025 2030 2038

Activity	Effect	Receptor(s)	Study Area	Temporal Scope
	Potential effect of workers and visitors on healthcare provision	Residents	CIA	2025 2030 2038
	Potential effect of workers and visitors on other public services	Residents	CIA	2025 2030 2038
	Potential effect on local retail and leisure, including town centres	Businesses	CSA	2025 2030 2038

Study methodology

7.26 Chapter 6: *EIA assessment methodology* (document reference 6.1.6) outlines the general assessment approach adopted for this EIA. Part of this approach is informed by government guidance on the specific content that should form part of the socio economic assessment. The assessment has regard to the *National Policy Statement for Ports* and the *NPS for National Networks*. Both provide a list of socio-economic impacts that should be considered, the detail of which can be found in Appendix 7.1: *Detailed Policy* (document reference 6.2.7.1). There is also currently no legislation and/or guidance that outlines recommended standard thresholds for the assessment of significance of socio-economic effects.

7.27 A summary of the assessment procedure in this chapter is provided below. Appendix 7.2: *Detailed Methodology* (document reference 6.2.7.2) provides a detailed explanation of the methodology.

7.28 Socio-economic effects are identified by the interaction between magnitude of impacts and the sensitivity of receptors:

- The receptor sensitivity is the ability of a given geographical area, community, resource or receptor to deal with or respond to change. This sensitivity is derived from an analysis of baseline socio-economic conditions and, where possible, future baseline conditions.⁷ Receptor sensitivities can be low (meaning the socioeconomic indicator is performing well and/or is largely insensitive to changes in baseline conditions), medium (a moderate socio-economic issue) or high (representing a significant and persistent socioeconomic issue, where the receptor is highly sensitive to any changes); and
- The magnitude of impact is the degree of change in the socio-economic determinant

⁷ Where the future baseline is not available, the receptor population affected in the future assessment years assessed against existing baseline levels.

compared to the baseline conditions.⁸ Impact magnitudes can be negligible (the change in the socio-economic indicator as a result of the development is imperceptible relative to baseline conditions), low, medium or high (the change in the socio-economic indicator as a result of the development are expected to make a large difference).

- 7.29 The table below shows how the magnitude of impact and sensitivity of receptor combine to determine the scale of the effect. Effects can be either beneficial or adverse; temporary or permanent; and, direct or indirect. Effects that are classified as moderate or major are considered to be significant.

Table 7.9 Matrix of effect significance based on interaction of receptor sensitivity and impact magnitude

Significance magnitude	Sensitivity of receptor		
	High	Medium	Low
High	Major	Major	Moderate
Medium	Major	Moderate	Minor
Low	Moderate	Minor	Negligible
Negligible	Minor	Negligible	Negligible

- 7.30 Embedded mitigation (i.e. mitigation that is incorporated within the current design for the Proposed Development) is referred to and included in the assessment of effects. If the effect does not require additional mitigation (or none is possible), the residual effect will remain the same. If, however, additional mitigation is required (or enhancement measures are proposed) an assessment of the post-mitigation and / or enhancement residual effect is provided.

Reference sources used

- 7.31 The table below summarises the reference sources used, grouped by the level of confidence in the source.⁹ Appendix 7.2: *Detailed Methodology* (document reference 6.2.7.2) provides more information on the data sources.

⁸ As described in Appendix 7.2: *Detailed Methodology* (document reference 6.2.7.2), the classification of magnitude of impact on socio-economic receptors takes account of such factors as: spatial scale, frequency of effect, degree of change relative to existing environmental conditions, reversibility of effect, and its duration.

⁹ Confidence level based upon the organisation responsible for collating data sources (high = regulatory source and highly representative of required baseline information, medium = either regulatory source but not very representative or non-regulatory source but highly representative, low = non-regulatory source and not very representative of required baseline information.)

Table 7.10 Data sources used to inform the socio-economic assessment grouped by confidence

High confidence	Medium confidence
ONS, Annual Population Survey, January to December 2019	Construction Skills Network forecasts 2019-2023, 2019
ONS, Business Register and Employment Survey, 2018	Census, 2011 ¹⁰
ONS, UK Business Counts, 2019	NHS Digital – GP Workforce Statistics March 2020
ONS, model-based estimates of unemployment, 2019	NHS Dental Statistics, 2019-20
ONS, Claimant Count by sex and age, 2019	Ordnance Survey Addressbase Premium, 2020
Department for Education, NEET and participation: local authority figures, 2019	Visit Britain Accommodation Stock Audit, 2016
ONS, Annual Survey of Hours and Earnings, 2019	Visit Kent Accommodation Audit, 2019
Department for Education, Apprenticeships and traineeships data	Information requests by land referencing company LRS on behalf of LRCH
ONS Crime Statistics, 2019	ONS, Population Projections, 2020
MCHLG, Live tables on dwelling stock (including vacant properties), Table 100 Dwelling stock: Number of Dwellings by Tenure and District: England; 2019	Understanding Kent and Medway's Growth Requirements, 2015
Valuation Office Agency, Non-Domestic Ratings, 2020 ¹¹	North Kent Strategic Housing and Economic Needs Assessment, March 2015
ONS, Mid-year population estimates, 2018	Thurrock Council, Addendum to the South Essex Strategic Housing Market Assessment, May 2017
Department for Education, Edubase, 2019	Five Year Housing Supply Reports (Dartford – 2019, Gravesham - 2018 and Thurrock - 2020)
	Dartford Borough Council, 2019, Dartford and Ebbsfleet Housing Needs Assessment; Dartford Borough Council, 2018, Swanscombe Area Profile; Kent County Council, 2020, What is causing Kent's population growth; Gravesham Borough Council, 2016, Strategic Housing Market Assessment; Thurrock Council, 2016, South Essex Strategic Housing Market Assessment
	Aecom, Global Theme Park Attractions Report, 2019
	Dartford Council, 2017, Carter Jonas Bluewater Shopping Centre Proposed Extension - Retail Planning Impact Appraisal (RPIA); Gravesham and Medway Councils, 2016, North Kent SHENA

¹⁰ In some respects, the Census is the most comprehensive and detailed data source available and so, for some metrics, could be considered to have high confidence. However, in this chapter, the Census is used to demonstrate industry specific levels of qualifications and act as a basis for commuting patterns. Both these measures have the potential to have changed in the last nine years, and so the data is conservatively assigned a medium sensitivity.

¹¹ Contains public sector information licensed under the Open Government Licence v3.0

High confidence	Medium confidence
	— Retail & Commercial Leisure Assessment; Thurrock Council, 2017, South Essex Retail Study; ONS, 2019, Household Expenditure Survey

Assumptions and limitations

7.32 Appendix 7.2: *Detailed Methodology* (document reference 6.2.7.2) provides more detail over the assumptions and limitations regarding baseline data and economic projections.

COVID-19

7.33 The COVID-19 pandemic has the potential to impact a variety of health, social, economic and demographic indicators. It could impact the assessment by changing the sensitivity of the future baseline for the effects. The likely impact of COVID-19 on many of these indicators is uncertain at this stage and will depend on several factors, not least how long the pandemic persists. However, there are a number of respected official forecasts that have been referred to in the Bank of England Monetary Policy Report,¹² which conclude that the impact of the pandemic is not expected to be persistent, as GDP is projected to recover to pre-pandemic levels of economic activity by 2024 (the opening year of Gate One). This indicates that the impact of COVID-19 is largely relevant for short-term effects and it would not be a material consideration for the operational effects.

7.34 The impact of COVID-19 on the future baseline is therefore considered for all construction effects and only considered for operational effects where there is more relevant evidence of a longer term impact. For example, there is evidence that there may be a longer term impact of COVID-19 on healthcare as other medical procedures have been delayed. There is also emerging evidence that COVID-19, and the response to the pandemic, has had an impact on mental health. Similarly, there are also widely supported indications that COVID-19 could accelerate changes in the retail and leisure sector. This chapter does not assess the implications for other operational effects where there is greater uncertainty. Where the impact of COVID-19 is assessed, the assessment is conservative to reflect the uncertainty and different future scenarios are presented where possible. This represents an unavoidable limitation in the assessment, but it remains sound and precautionary based on current knowledge.

Cumulative effects assessment

7.35 The baseline assessment presents data on the evolution of the baseline for some socio-economic indicators. Projections of employment, population and housing are presented for each of the core assessment years. These projections should implicitly account for changes in these indicators as a result of other future developments being brought

¹² Bank of England (2020); Monetary Policy Report August 2020

forward in the relevant areas (and this is sense-checked in the assessment).

7.36 The projections for population, employment and housing do not capture all changes in socio-economic conditions – such as demand for construction workers or change in provision of public services. To account for this, data are presented on the expected changes as a result of future developments, where available projections do not account for these changes. Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) provides more information on this approach including a table which considers how cumulative effects are considered for each effect. These cumulative considerations – be they projections or assessments of future developments – are contained in the future baseline for each effect.

RELEVANT LAW, POLICY AND GUIDANCE

Policy

7.37 Appendix 7.1: *Detailed Policy* (document reference 6.2.7.1) provides a detailed policy review that is relevant to the land use and socio-economic impacts of the London Resort. The appendix encompasses policy from Dartford, Gravesham and Thurrock, Ebbsfleet Development Corporation (EDC), regional and sub-regional bodies relevant to the London Resort (the South East Local Enterprise Partnership or SELEP, the Kent and Medway Economic Partnership (KMEP), the Thames Gateway Kent Partnership (TGKP) and Kent County Council (KCC), and national policies (NPPF, NPS for National Networks, and NPS for Ports). The appendix is split into key socio-economic themes to facilitate comparison between policies.

7.38 Table 7.11 summarises the key policies and requirements that are relevant to the London Resort from a socio-economic perspective. A reference as to where these policies are addressed in the ES is provided in the third column.

Table 7.11 Summary of local, sub-regional, regional and national policies (grouped by socio economic theme) and location in the ES where the policies are addressed

Summary	Key policy references	ES reference
<i>Economic growth</i>		
The NPPF chapter 6 focuses on growing a strong, competitive economy whilst the NPS for National Networks highlights the important consideration of potential developmental benefits with regard to the facilitation of economic development and job creation. At the sub-regional levels, both the KMEP and TGKP note productivity issues in their economies (as is the case at the national level) and establish	Dartford Core Strategy 2011 Ebbsfleet Inclusive Growth Strategy (2019-2025)	The London Resort’s employment opportunities align with Dartford’s key growth centres, and skills and training opportunities will be beneficial in improving worker productivity.

Summary	Key policy references	ES reference
<p>policies focusing on improving their productivity. The TGKP specifically identifies the Swanscombe Peninsula area as a key employment location in which they would like to attract and retain investment. At the CSA level, Dartford BC’s Core Strategy states that key growth sectors include the creative industries, hospitality, leisure, built environment and construction. EDC’s growth strategy highlights a need to establish stronger links with Thames Estuary, Kent and London.</p>	<p>KMEP Unlocking the Potential: Going for Growth 2013</p> <p>TGKP Plan for Growth 2014-2020</p> <p>National Planning Policy Framework (NPPF) 2019</p> <p>National Policy Statement (NPS) for National Networks 2014</p>	<p>The contributions to both temporary and permanent job creation are discussed in further detail in paragraphs 7.272-7.297. The displacement of existing businesses on site is considered in paragraphs 7.240-7.257.</p>
<p><i>Local jobs and jobs growth</i></p>		
<p>All CSA local authorities promote the provision of jobs for local residents in their policies, with the councils seeking to work with regeneration partners and developers within their areas to maximise employment opportunities that are available to their resident populations. A consistent theme is maximising jobs growth, along with minimising unemployment and increasing opportunities for local employment. Whilst there is a clear focus on maximising local jobs provision, none of the CSA local authorities’ policies identifies a specific quantitative target for the proportion of employment opportunities that should be taken by local residents as part of proposed developments. The Thurrock Equality & Diversity Scheme aims to address the barriers that affect various disadvantaged groups, whilst the KCC skills strategy emphasises the importance of targeted support for vulnerable young people.</p>	<p>Gravesham Local Plan Core Strategy 2014</p> <p>Dartford Core Strategy 2011</p> <p>Thurrock Core Strategy and Policies for Management of Development (as amended) Adopted January 2015</p> <p>A Single Equality Scheme and Corporate Equality Framework for Thurrock Council (2018-2022)</p> <p>Thurrock Equality & Diversity Scheme for Community Led Local Development in Tilbury and Tilbury Local Action Group</p> <p>Ebbsfleet Implementation Framework (2017)</p> <p>Ebbsfleet Inclusive Growth Strategy (2019-2025)</p> <p>South East LEP Strategic Economic Plan 2014</p>	<p>The London Resort’s contribution towards local employment is considered in paragraphs 7.218-7.221 in respect of construction, and paragraphs 7.298-7.311 in respect of operational effects. The mechanisms for maximising such benefits are discussed in further detail in Appendix 7.7: <i>Outline Employment and Skills Strategy</i> (document reference 6.2.7.7).</p>

Summary	Key policy references	ES reference
	TGKP Plan for Growth 2014-2020 Kent and Medway Growth and Infrastructure Framework 2011 to 2031; 2018 update	
Tourism, retail and leisure		
<p>CSA local authorities recognise the economic value of a strong tourism industry and they promote its growth within their respective areas. Furthermore, recreation and leisure offerings are supported and considered an opportunity growth sector by Thurrock. KMEP notes that it will continue investment in Visit Kent to promote the county, ensuring a consistent, quality brand. The Tourism Sector Deal (part of the UK Industrial Strategy) outlines a commitment for industry to create 130,000 additional bedrooms across the UK by 2025 (+21%) and continued investment in tourism attractions. The NPPF identifies a requirement that retail and leisure developments in out of centre locations over a certain threshold floorspace should demonstrate that the scheme will not have a significant adverse impact on existing centres.</p>	Dartford Core Strategy 2011 Gravesham Tourism Strategy 2009 – 2012 Gravesham Local Plan Core Strategy 2014 Thurrock Strategy for Economic Growth 2016 Active Ebbsfleet (2019) KMEP Unlocking the Potential: Going for Growth 2013 HM Government, the Tourism Sector Deal 2019 National Planning Policy Framework 2019 National Policy Statement (NPS) for Ports 2012	<p>The effects referred to above and detailed in paragraphs 7.272-7.297, and paragraphs 7.298-7.311 assess the jobs created by the London Resort, which given its entertainment focus, are naturally related to the tourism, retail and leisure sectors. Paragraphs 7.141-7.152 consider the impact of the London Resort on other theme parks. Paragraphs 7.237-7.239 and 7.323-7.356 respectively consider the impacts on accommodation stock during construction and operation, whilst paragraphs 7.357-7.360 consider visitor expenditure and worker expenditure. Paragraphs 7.375-7.381 and Appendix 7.9: <i>Retail and Leisure Impact Assessment</i> (document reference 6.2.7.9) assess the effect on retail and leisure, including town centres.</p>
Relevant designations		
<p>The Swanscombe Peninsula is designated as an opportunity area in both Dartford and Gravesham policy as an area with the potential to deliver substantial economic benefits. The TGKP Plan for Growth specifically in reference to the London Resort concludes that the ‘economic benefits would reach far into Kent, London and the wider South East in terms of supply chains, enhancement of the leisure, hospitality and tourism offer.’</p>	Dartford Core Strategy 2011 Gravesham Local Plan Core Strategy 2014 TGKP Plan for Growth 2014-2020	

Summary	Key policy references	ES reference
<i>Sustainable development and development distribution</i>		
<p>The local authorities acknowledge the regeneration possibilities and scale of potential development required in the area in order to deliver growth objectives. In supporting these aims, they seek to distribute development sustainably. Identifying the Ebbsfleet Opportunity Area and the importance of a sustainable mix of uses, including community facilities in delivering growth. TGKP specifically note the importance of new developments enhancing North Kent’s reputation as a desirable location to live, work, invest and enjoy leisure.</p>	<p>Dartford Core Strategy 2011</p> <p>Gravesham Local Plan Core Strategy 2014</p> <p>Ebbsfleet Inclusive Growth Strategy (2019-2025)</p> <p>TGKP Plan for Growth 2014-2020</p>	
<i>Skills and training</i>		
<p>All authorities have overarching aims of improving the skills of their residents, so that their workforces are able to access higher skilled employment opportunities with greater earnings potential. All three CSA local authorities specify that major developments will be expected to contribute towards the delivery of skills training, so that local residents benefit from the opportunities arising out of these developments. In particular, Thurrock’s Equality Scheme and Corporate Equality Framework outlines their ambition to promote equality of opportunity through the development of local workforce’s skills set. SELEP places a focus on the Government’s new T-Level qualifications, while the TGKP aims to increase the proportion of residents with NVQ4+ qualifications to at least 90% of the national average by 2020. The SELEP also places significant emphasis on simplifying the skills landscape for employers, working in tandem with employers (for example, through an employer-led skills advisory panel) so that schemes can deliver better economic outcomes.</p>	<p>Gravesham Local Plan Core Strategy 2014 Policy CS07</p> <p>Gravesham Local Development Scheme 2019-2021</p> <p>Dartford Core Strategy 2011 CS9</p> <p>Thurrock Core Strategy and Policies for Management of Development (as amended) Adopted January 2015 PMD16</p> <p>A Single Equality Scheme and Corporate Equality Framework for Thurrock Council (2018-2022)</p> <p>Ebbsfleet Inclusive Growth Strategy (2019-2025)</p> <p>South East LEP Skills Strategy 2018-2023</p> <p>South East LEP Smarter Faster Together: towards</p>	<p>The London Resort’s contribution towards raising the skills and training of workers is considered in paragraphs 7.218-7.221 in respect of construction, and paragraphs 7.298-7.311 in respect of operational effects. The mechanisms for delivering skills and training objectives are discussed in Appendix 7.7: <i>Outline Employment and Skills Strategy</i> (document reference 6.2.7.7).</p>

Summary	Key policy references	ES reference
	a local industrial strategy 2019 Priority 2 TGKP Plan for Growth 2014-2020 Objective 6 KCC Refresh of the 14-24 learning, employment and skills strategy 2017-2020 UK Industrial Strategy White Paper 2017 NPS for Ports 2012	
<i>Apprenticeships</i>		
All authorities promote the need for the continued provision of apprenticeships as part of the workforce in their geographical areas, particularly at higher-skilled level. These apprenticeship opportunities provide training to residents and help them to access labour markets. The local authorities in the CSA do not, however, have specific apprenticeship targets and hence this review relies on targets set by HM Government and LEPs instead. The government set a 2015 target to achieve 3 million apprenticeship starts between 2016 and 2020. SELEP calculated their contribution to that (based on population) would be 210,000 starts, although their most recent figures suggest that are set to under-deliver by at least 50,000 starts (24%). The TGKP set the objective to at least match the national apprenticeship achievement rate by 2018. At the UK level, the Tourism Sector Deal outlines industry commitment to delivering 30,000 apprenticeships per year to 2025.	South East LEP Skills Strategy 2018-2023 TGKP Plan for Growth 2014-2020 HM Government, English Apprenticeships: Our 2020 Vision, 2015 HM Government, Tourism Sector Deal, 2019	
<i>Working with schools and other educational institutions</i>		
Policymakers often place a key focus on ensuring that new developments take younger residents into consideration in their proposals, predominantly through facilitating engagement between local schools and colleges with developers. The intention of this engagement is to raise the skills aspirations of the younger	South East LEP Smarter Faster Together: towards a local industrial strategy 2019. Strategic focus TGKP Plan for Growth 2014-2020. Objective 10	

Summary	Key policy references	ES reference
<p>population and as a result create a long-lasting impact on the employment and skills outcomes of the local population. Sub regional policies all note the importance and benefit of employers and education providers working together, in order to best match students to employer needs. Through effective communication and partnerships, employers can help to ensure that students are more employable, possessing the skills and experience desired by businesses.</p>	<p>KCC Refresh of the 14-24 learning, employment and skills strategy 2017-2020. KPI 4</p>	
<p>Crime</p>		
<p>Local policy centred around the issue of crime is generally geared towards establishing preventative measures that can be achieved through ensuring that the design and access element of any proposed development is of an acceptable quality. Emphasis is placed on providing and maintaining safe areas (both publicly and privately accessible) that discourage and reduce anti-social behaviour across the community.</p>	<p>Dartford Core Strategy 2011</p> <p>Dartford Development Policies Plan 2017</p> <p>Gravesham Local Plan Core Strategy 2014</p> <p>Thurrock Core Strategy and Policies for Management of Development (as amended) Adopted January 2015</p> <p>NPPF 2019</p>	<p>The London Resort’s approach to minimising crime through design is outlined in paragraphs 7.385 and 7.386.</p>
<p>Health and social care</p>		
<p>At the local level, the objectives surrounding health and social care are primarily based on the provision of healthcare services, as well as the encouragement of healthy lifestyles. Dartford Council has set out their desire to provide additional primary health services within the local authority area, in order to meet the anticipated needs arising from a growing population. Similarly, Thurrock and EDC have also stated their intentions to bolster their health and social care infrastructure systems, with several strategic sites (e.g. Grays Community Hospital, Chadwell St Mary, Purfleet, Alkerden Education Campus and Station Quarter North near Ebbsfleet Central) being marked for targeted investment.</p>	<p>Thurrock Core Strategy and Policies for Management of Development (as amended) Adopted January 2015</p> <p>Ebbsfleet Implementation Framework (2017)</p> <p>Kent and Medway Growth and Infrastructure Framework 2011 to 2031; 2018 update</p>	<p>The impact of the construction workforce and operational phase of the London Resort on healthcare provision is considered in paragraphs 7.229-7.236 and 7.361-7.368 respectively.</p>

Summary	Key policy references	ES reference
<i>Housing delivery</i>		
<p>All CSA local authorities have an objectively assessed need (OAN) for housing and identified supply over the next five years: Dartford (4,184 additional dwellings required between 2019 and 2024 with identified supply of 113%), Gravesham (2,941 dwellings required between 2019/20 and 2023/23 with identified supply of 88%) and Thurrock (6,409 to 6,841 dwellings required between 2016 and 2021 with identified supply of 50% to 54%). Note that where identified supply is less than 100%, this means that the local authority has a higher housing need than deliverable land identified to be able to deliver it. In Dartford, Ebbsfleet is a key strategic site for housing delivery. All sub-regional areas also have ambitious targets for delivery, including a TGKP target of 50,000 new homes between 2006 and 2026.</p>	<p>Dartford Borough Council Five Year Housing Supply 2019 – 2024</p> <p>Gravesham Borough Council Five Year Deliverable Housing Land Supply Statement 2018 – 2023</p> <p>Thurrock Five Year Housing Land Supply Position Statement 2016 – 2021</p> <p>Ebbsfleet Implementation Framework (2017)</p> <p>TGKP Plan for Growth 2014-2020</p>	<p>The impact of the London Resort on the housing market is discussed in paragraphs 7.237-7.239 and 7.323-7.356 during construction and operation.</p>
<i>Sports, recreation, open space and healthy communities</i>		
<p>All CSA authorities promote healthy communities and recognise the contribution to health and wellbeing in communities that is made by access to good quality sports and recreation in open space outdoors.</p>	<p>Dartford Core Strategy 2011</p> <p>Dartford Development Policies Plan 2017</p> <p>Gravesham Local Plan Core Strategy 2014</p> <p>Thurrock Core Strategy and Policies for Management of Development (as amended) Adopted January 2015</p> <p>Ebbsfleet Implementation Framework (2017)</p> <p>Active Ebbsfleet (2019)</p> <p>Kent and Medway Growth and Infrastructure</p>	<p>The impact of the London Resort on open space, sports and recreation facilities, education infrastructure, other social and green infrastructure, as well as routes, PRoWs and public realm, is considered in paragraphs 7.258-7.263 and paragraphs 7.369-7.374 consider the effects on other public services.</p>

Summary	Key policy references	ES reference
	Framework 2011 to 2031; 2018 update NPPF 2019 NPS for Ports 2012	
Education infrastructure		
<p>The CSA local authorities are unanimously in favour of making sure that educational facilities are operating at a sustainable level in terms of capacity. By a 'sustainable level', it is meant that it does not impede the accessibility and quality of the services they provide.</p>	Gravesham Local Plan Core Strategy 2014 Thurrock Core Strategy and Policies for Management of Development (as amended) Adopted January 2015 NPPF 2019 NPS for Ports 2012	
Other social infrastructure		
<p>This section refers largely to policies relating to community facilities, play space, religious buildings and burial grounds. Community facilities are widely understood to be of significant importance to the communities they serve. Emphasis has been placed on the requirement that the provision of such facilities should meet demand and ultimately be fit for purpose. There is variation in the specific type of facility that each local authority has identified as an area of focus, ranging from recycling centres to places of worship.</p>	Thurrock Core Strategy and Policies for Management of Development (as amended) Adopted January 2015 CSTP10 and CSTP13 Gravesham Local Plan Core Strategy 2014 Dartford Core Strategy 2011 Ebbsfleet Implementation Framework (2017) Active Ebbsfleet (2019) Space in the Place – Civic Infrastructure Study (May 2019) Kent and Medway Growth and Infrastructure	

Summary	Key policy references	ES reference
	Framework Kent County Council (2018 Update) NPS for Ports 2012	
<i>Green infrastructure and biodiversity</i>		
<p>CSA authorities seek to protect and enhance green infrastructure within their boroughs and promote connectivity between green infrastructure locations as well as between urban and rural areas. Dartford BC’s Core Strategy seeks to create 300 hectares (ha) of new or improved green space as part of new developments by 2026 and will seek off-site contributions in cases where this is not appropriate or feasible.</p>	Thurrock Core Strategy and Policies for Management of Development (as amended) Adopted January 2015 Dartford Core Strategy 2011 Gravesham Local Plan Core Strategy 2014 Ebbsfleet Implementation Framework (2017) Active Ebbsfleet (2019) NPS for Ports 2012	
<i>Routes and public rights of way (PRoW)</i>		
<p>All authorities seek to protect and enhance public rights of way and access, as required by the NPPF. Additionally, it is noted in Dartford’s Core Strategy that new trip generating developments are supported by a travel plan to encourage sustainable travel. These developments will only be permitted if provision is made for public transport and taxis, allowing penetration of routes to make community services easily accessible to all users and feasible and efficient to operate.</p>	Gravesham Local Plan Core Strategy 2014 Thurrock Core Strategy and Policies for Management of Development (as amended) Adopted January 2015 Dartford Core Strategy 2011 Dartford Development Policies Plan 2017 Ebbsfleet Implementation Framework (2017) NPPF 2019	

Summary	Key policy references	ES reference
Public realm		
All policies promote and recognise the importance of public realm in enhancing and delivering good quality new developments.	Gravesham Local Plan Core Strategy 2014 Dartford Development Policies Plan 2017 Active Ebbsfleet (2019) Ebbsfleet Public Realm Strategy 2019	

Guidelines and best practice

- 7.39 The *Institute of Environmental Management and Assessment: Guidelines for Environmental Impact Assessment, 2004* represent the overarching guidelines produced by the Institute of Environmental Management and Assessment to inform what constitutes good practise for undertaking EIAs.
- 7.40 *HHS HUDU Planning Contribution Model* sets out the benchmark standard healthcare provision rate of 1,800 patients per GP full time equivalent (FTE).
- 7.41 *Handbook to the NHS constitution* pledges the operational standard that at least 95% of patients attending A&E should be admitted, transferred or discharged within four hours. In March 2019, the Review of NHS Access Standards was published, which proposed that the current four-hour A&E target should be replaced by a set of access standards, including the average waiting time in A&E, time to initial clinical assessment, and time to emergency treatment for critically ill and injured patients. Due to the COVID-19 outbreak, publication of the review’s recommendations has been delayed until late 2020. The existing four-hour target remains in force until any new standards are announced.¹³
- 7.42 The *Additionality Guide, Fourth Edition (2014)* was produced by English Partnerships and provides guidelines to assess the impact of a proposed development after accounting for displacement, multiplier and leakage impacts. Additionality is defined as ‘the extent to which activity takes place at all, on a larger scale, earlier or within a specific designated area or target group as a result of the intervention’.
- 7.43 The *Employment Densities Guide 3rd edition (2015)* published by the Homes and Communities Agency was written to assist in estimating the employment generated by property development across different floorspace types (by planning use class) based on ‘employment density’ ratios, which are generally expressed as the number of square

¹³ Nuttfield Trust, A&E waiting times, 2020. Retrieved from <https://www.nuffieldtrust.org.uk/resource/a-e-waiting-times>. Accessed October 2020.

metres per full-time employee.

- 7.44 However, the London Resort is unique in character and the employment densities and additionality guides do not contain entirely appropriate industry standard metrics for assessing the likely direct, indirect and induced employment effects of the proposals. In assessing the effects, this assessment therefore also draws upon industry knowledge from the Applicant and their theme park and hotel expert advisors, and appropriate benchmarks and comparators. Where assumptions are required, and for which comparator empirical evidence is not available, the assumptions and the basis for them is transparently described and the results are subject to sensitivity tests, with potential ranges presented as appropriate.
- 7.45 Where the approach departs from such socio-economic industry standards, explanation and justification for the methodology is provided. The employment densities guide notes the following, which provides support for this approach:

'The diversity of the cultural attraction sector indicates that providing a single density is impossible, and even the range provided requires significant levels of specific understanding to ensure employment estimations are accurate.'

BASELINE CONDITIONS - CONSTRUCTION

- 7.46 This section sets out a summary baseline of the socio-economic and land use conditions relevant to each effect outlined in Table 7.8. If baseline conditions in the operational stage effects are also relevant to the construction stage effects, they are described in the construction phase baseline and then cross-referenced in the operational effects baseline. This section is deliberately succinct in describing the baseline conditions. A detailed baseline including other comparators and metrics can be found in Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3).

Employment generation and effects on businesses in the supply chain

- 7.47 The London Resort is expected to support a large construction workforce. To understand the impact of this, it is important to understand the existing construction employment and construction workforce availability.

Baseline

- 7.48 Residence-based estimates (2018) show that there is a large construction workforce living in the LCA (361,000 residents) and the CSA (17,300), making up a large proportion of working age residents (8.3% and 8.5% respectively) compared to the national average (7.2%). Of all CSA businesses, 22% are in the construction industry, in comparison to 13% nationally. Workplace-based estimates show that there were 221,500 construction workers in the LCA in 2018, equating to 4.5% of the total LCA workplace workforce, which

is similar to the GB average. Of these, 13,010 were in the CSA (7.8%).¹⁴

- 7.49 Construction workers are much more mobile than other sectors, traveling at least double the average distance travelled by the average worker.¹⁵ This is evident in the comparison between working residents and workforce in the construction sector, which indicates a high level of commuting.
- 7.50 There are also a reasonably large number of unemployed people: 8,700 in the CSA (4.2%), 173,000 in the LCA (4.0%) compared to 4.0% in the UK in 2019.¹⁶ Furthermore, the SRCA has 3,720 people not in education, employment or training (NEET) – equivalent to 5.1% of 16-17 year old residents (5.5% average across England). The CSA had a 2019 average of 6,000 claimants and the LCA had 143,000 (both 2.6%; the same as the UK), which could potentially contribute additional construction labour.

Future baseline – construction employment

- 7.51 It is estimated that UK construction employment will grow by 168,500 between 2019 and 2023 - equivalent to annual growth of 0.5% since 2019, in line with the whole economy average.¹⁷ The cumulative schemes are expected to require a total average of 6,060 construction workers in 2023 and 1,075 in 2028. Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) provides a detailed breakdown of the cumulative schemes. The 6,070 workers are equivalent to around 1.7% of construction workers living in the LCA.
- 7.52 During pre-application consultations, concerns were raised that the scale of construction work in the area could make the job market tighter, making it difficult for various projects to employ workers and pushing up wages and therefore costs. In addition to the above statistics that the cumulative workforce only accounts for 1.7% of construction workers living in the LCA. Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) presents information on the characteristics of these workers that they are highly mobile, there is availability of workers, and significant turnover of workers. Overall, then, whilst local developments will increase demand for construction workers, this is not expected to have a significant impact on the labour market. Given the highlighted concerns of local stakeholders regarding availability of construction workforce, the sensitivity of residents and businesses to changes in construction employment is judged medium to be conservative.
- 7.53 The initial impact of COVID-19 on the construction labour market has evidently been adverse in nature as the number of furloughed construction workers peaked in mid-April, with c. 49% (721,000 jobs) of UK construction workers being furloughed.¹⁸ This number

¹⁴ ONS, Business Register and Employment Survey, 2018

¹⁵ CITB Workforce Mobility and Skills Reports (South East, East of England and Greater London), 2019; National Travel Survey FY18

¹⁶ These figures are before the impact of the pandemic on unemployment figures. The initial impact of COVID-19 is considered in the future baseline where relevant.

¹⁷ CITB, Construction Skills Network forecasts 2019-2023, 2019; Volterra calculations

¹⁸ ONS (2020), Coronavirus Job Retention Scheme statistics: September 2020

has since fallen: the most recent data (31st July 2020) shows that in late July, approximately 19% (277,000 jobs) of construction workers were reported to be on the job retention scheme, equivalent to a 62% reduction from peak levels (the 2nd fastest decrease, out of 19 sectors, in relative terms). Further discussion on the current state of the wider economy as well as forecasts on potential post-pandemic economic growth is presented in Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3).

Sensitivity

7.54 Overall, construction businesses and existing and future residents within the LCA are expected to have a **medium** sensitivity to construction employment effects. At the national level, there is expected to be a **low** sensitivity to construction employment effects due to the large available construction workforce and anticipated future workforce growth.

Labour market, skills and training

7.55 The London Resort will provide a valuable opportunity to raise the qualifications of construction workers, providing upskilling and training opportunities. To assess the impact of this, the existing level of skills and training in the construction labour market needs to be understood.

Baseline

7.56 There are identified concerns over low skill levels in the CSA and the wider Thames Estuary. Only 33% of CSA residents (all industries) are qualified to NVQ4+ level, lower than the UK rate of 40% which in turn is lower than the LCA and RCA levels of 45% and 46% respectively. Of all CSA residents, 9% had no qualifications – slightly higher than UK level (8%).¹⁹

7.57 The 2011 Census²⁰ showed that 14% of construction workers in the CSA were qualified at a Level 4 or above (degree level qualification or higher) – lower than the RCA (18%) and UK (17%). This mirrors trends across all industries, where 23% of CSA workers are qualified to NVQ4+ level compared to 35% nationally. Of the CSA construction workforce, 18% had apprenticeships (19% in the UK) compared to 11% across all industries (9% England).

7.58 CSA construction workers earn an average annual income of £38,300, slightly higher than £36,500 in the UK but slightly lower than SRCA and RCA. The workplace-based estimate for CSA construction workers is £38,500, higher than the UK, RCA and SRCA levels. Construction workers across all geographies have higher average incomes than the average across all sectors, showing that construction workers in the CSA are well paid.²¹

¹⁹ ONS, Annual Population Survey, 2019

²⁰ ONS, Census, 2011

²¹ ONS, EARN03 Average Weekly Earnings, 2019; Annual Survey of Hours and Earnings, 2019

- 7.59 According to the Department for Education, there were 140 apprenticeship starts in the CSA in construction, planning and the built environment in the academic year 17/18. This equated to 6% of all CSA apprenticeship starts, in line with the England average (6%). The number of starts has been slowly rising over time: there were 75% more starts in 17/18 in the CSA than in 14/15, which is higher growth than in the other geographies. Over the period 14/15 to 17/18, the CSA has seen an annual average apprenticeship achievement rate of 48%. This is slightly lower than the England level (51%) but higher than the SRCA, South East Local Enterprise Partnership (SELEP) and RCA (44%, 44% and 47% respectively).²²
- 7.60 In 2016, 20% of surveyed construction companies reported a skills gap within the existing workforce, suggesting an increase of prevalence in recent years.²³ The workforce is aging, with 22% of the workforce over the age of 50 and 15% aged over 60. Many operatives are retiring early, taking skills and valuable teaching resources with them. In 2015, only 53% of the workforce were trained, which is the third lowest rate compared with other industries.²⁴ Public funding cuts have meant that there are less resources to train because firms do not want to take on the (time and cost) burden themselves. As well as training barriers inside the industry, the sector is not viewed as attractive to young people: two thirds of school leavers and graduates would not consider pursuing a career in construction. Research finds that many young people view jobs in the industry as low status, dirty or badly paid.²⁵

Future baseline – construction labour market, skills and training

- 7.61 The Construction Skills Network forecast stated that the most in-demand jobs over the 2019-2023 period (in absolute terms) would be for other construction process managers (3,420), other construction professional and technical staff (3,260) and wood trades and interior fit-out (2,380). In terms of base 2019 employment, the biggest requirements were predicted to be for scaffolders (3.1%), logistics personnel (2.6%) and plant operatives (2.3%).²⁶ MACE estimate that, over the next two decades, 600,000 construction employees may need to be reskilled due to trades being vulnerable to technological change and new roles being created by technology.²⁷

Sensitivity

- 7.62 Given the relatively low qualifications of CSA residents and workers relative to national levels, the average level of construction apprenticeship starts, the future skills requirements in the sector and the greater reliance of the construction industry upon apprenticeship qualifications, it is expected that existing and future residents within the

²² Department for Education, 2019

²³ BCTG Construct, 2018, Supervisory Skills Gaps within the UK Construction Industry.

²⁴ UKCES (2016). Employer Skills Survey 2015: UK Results

²⁵ Marriot & Moore (2014). NHBC Foundation: improving recruitment of young people into home building: a literature review

²⁶ Construction Skills Network forecasts 2019-2023, 2019

²⁷ MACE, 2017, Insights 2017: Moving to Industry 4.0: A skills revolution

CSA are expected to have a **high** sensitivity to construction skills and training effects.

Crime levels

7.63 Concerns are sometimes raised on major projects that the presence of a large construction workforce can affect crime levels and anti-social behaviour, or the fear of crime. The crime baseline in the CSA is therefore considered here.

Baseline

7.64 There were 114 crime incidents per 1,000 population in 2019 in the CSA, representing a 35% higher prevalence of crime than across England and Wales as a whole (84 per 1,000).²⁸ The type of crime with the highest rate in the CSA was violence without injury (20 per 1,000), which was almost double the national rate of 11. For many types of crime, the CSA is in line with, or slightly higher than national rates. Criminal damage and arson, shoplifting, stalking and harassment, vehicle offences and violence with injury are all higher.

7.65 Across the CSA, approximately 9,000 anti-social behaviour (ASB) incidents were recorded in 2018, equivalent to 23 per 1,000 population. Comparatively, this is lower than the regional average recorded across the SRCA (Kent and Essex), where 80,800 incidents were recorded at a rate of 27 per 1,000 population.

7.66 Since 2015, CSA and national crime rates have been rising and there has been a relatively faster increase in the CSA than other comparators, indicating a growing problem with crime in the CSA. The Index of Multiple Deprivation (IMD) ranks Dartford (6th), Gravesham (19th) and Thurrock (75th) most deprived on crime of 317 local authorities.²⁹

Future baseline

7.67 This report found no data to inform the future baseline for crime rates, and effects are assessed against the current baseline levels. The cumulative schemes' construction workforces have the potential to increase crime rates, or the fear of crime, in the area in both 2023 and 2028.

Sensitivity

7.68 Overall, existing, and future residents within the CSA are expected to have a **high** sensitivity to construction workforce crime effects.

Local healthcare

7.69 The large construction workforce supported by the London Resort could require local healthcare services in the form of GPs, dentists, pharmacies, and emergency care.

²⁸ ONS, Crime Statistics, 2019

²⁹ MHCLG, Index of Multiple Deprivation, 2019

Existing healthcare provision is therefore considered here, so that the potential additional strain on healthcare provision can be assessed.

Baseline

- 7.70 Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) shows the identified healthcare provision within (and just outside) the CIA. None of the identified provision is located within the PSB and so none of these facilities is at direct risk of displacement.
- 7.71 In the CIA, there are three pharmacies and four dental surgeries (one not taking any new patients), with a total of 14 dental practitioners. CIA GP provision is highly constrained. Six surgeries are identified with three on each side of the Thames.³⁰ These surgeries have a patient to GP FTE ratio of 3,700; far above the 1,800 benchmark³¹ and above the CSA ratio (2,400). During pre-application consultation, Kent and Medway Clinical Commissioning Group (CCG), Thurrock and EDC confirmed that local healthcare is constrained, which aligns with this data.
- 7.72 The extent to which GP provision is constrained in the CSA can also be quantified by understanding the availability of GPs across the population. Under this metric, the constraints in the CSA are further emphasised, with the average GP FTE serving approximately 2,200 residents, higher than both the RCA and national averages per capita (1,800 and 1,700 respectively).
- 7.73 The nearest accident and emergency unit (A&E) to the Kent Project Site is at Darent Valley Hospital, which is part of the Dartford and Gravesham NHS Trust, located west of the CIA. On the north side of the river, the Basildon University Hospital (part of the Basildon and Thurrock Trust) is the closest provider of A&E services to the Essex Project Site. In 2018/19, these trusts had 132,300 and 131,290 A&E attendances respectively, with 87% and 83% admitted, transferred or discharged within 4 hours.³² This was below the 95% NHS target, but Dartford and Gravesham NHS Trust performed better than the England average (84%) which itself is below the target, demonstrating countrywide constraints. Health provision, in a wider sense, also incorporates services that directly deal with several health-related issues such as mental health, encouraging healthy lifestyles, cohesion and care of the community through community facilities, access to sufficient housing and inclusive design. These are discussed in Chapter 8: *Human Health* (document reference 6.1.8).

Future baseline – healthcare

- 7.74 The cumulative schemes identify new health services coming forward with the development of Eastern Quarry. Additionally, a mixed-use development (Stone Pit 2) in the parish of Stone has outlined plans to provide a ‘mixed-use unit’ that could house

³⁰ A 7th GP (Swanscombe Health Centre) has been identified in the CIA, however there is no data available for this surgery.

³¹ NHS London, 2009. HUDU Planning Contribution Model Guidance Reports.

³² NHS Digital, 2018/19 - Provider level analysis for HES Accident and Emergency Attendances. Note, the Trust also covers Queen Mary’s Hospital and Erith and District Hospital, but these do not offer A&E services.

several functions, including a Medical Centre. The developer of land west of Springhead Road in Northfleet will be making a financial contribution to the provision of a new health centre. The developer of land east of Caspian Way in Swanscombe is contributing 18,300 sqm of integrated medical and community facilities. Langdon Hills Golf and Country Club in Upminster will be providing a new health village for elderly residents requiring care. During pre-application, consultation with EDC and the Kent and Medway CCG confirmed that there will be a new Urgent Treatment Centre at Gravesham Hospital, due to open in December 2020. This replaces some of the functions of a previous walk-in centre that has been closed down but will contain some additional capacity.

- 7.75 During pre-application consultation, EDC noted that there are plans for a Health and Wellbeing Hub, which will be contained within the Health, Education and Innovation Quarter, just south of Ebbsfleet International station. This is however unlikely to be operational by 2023, the future baseline year when peak construction workforce is assessed. Details of the planned provision are contained within the operational healthcare future baseline (paragraph 7.197).
- 7.76 The cumulative schemes' construction workers are expected to add to the existing constraints. Between 2016/17 and 2018/19, an annual average of 2.4% of construction workers in Great Britain were injured at work, compared to 1.7% of workers injured across all industries. Applied to the future workforce of cumulative construction schemes, this could increase A&E attendances by 146 in 2023 (0.11%) and 41 in 2028 (<0.01%).
- 7.77 Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) discusses the various ways in which COVID-19 has affected demand for healthcare, where a major concern amongst health providers is that people have avoided seeking care in 2020 due to COVID-19.³³ Their demand for healthcare remains and, in some cases, the delay makes their health requirements more severe.³⁴ This is anticipated to result in a spike in demand in the future baseline, far above pre-pandemic levels.³⁵ There is also emerging evidence that the mental health of the whole population experienced a significant decline during the enforced lockdown and that this remains a growing issue exacerbated by ongoing reduced social contact.³⁶ Whilst localised data is not available, these countrywide trends are conservatively assumed to be relevant to the CIA. The timing of this spike will likely be after the major health concerns regarding the virus have been abated (e.g. a vaccine has been widely distributed) and the timing of this is unknown. However, the reasonable worst case for this effect is that it is causing further pressures on local healthcare in 2023.

³³ Reports show that almost half of psychiatrists have seen increases in urgent and emergency cases during lockdown, yet a similar proportion have seen a decrease in routine appointments. Royal College of Psychiatrists, (2020), Psychiatrists see alarming rise in patients needing urgent and emergency care and forecast a 'tsunami' of mental illness.

³⁴ NHS Providers, 2020, The Impact of Covid-19 on Mental Health Trusts in the NHS

³⁵ In a recent poll (August 2020), 26% of doctors said that in the last two weeks non-Covid demand had increased to pre-pandemic levels, with 17% saying that demand is now even higher than it was before. British Medical Association, 2020, COVID-19: analysing the impact of coronavirus on doctors

³⁶ More than two-thirds of adults in the UK (69%) report feeling somewhat or very worried about the effect COVID-19 is having on their life. ONS, 2020, Coronavirus and the social impacts on Great Britain: 5 June 2020

Whilst it is not possible to quantify the extent of the uplift that will occur, this factor is considered and is part of the reason the sensitivity is judged to be high, as described below.

Sensitivity

7.78 The current baseline identifies high constraints in the area, with additional pressure expected due to the cumulative schemes. Future plans regarding increased health provision remain uncertain in terms of timescales and deliverability. COVID-19 is expected to increase the demand for healthcare. Overall, existing and future residents are judged to have a **high** sensitivity.

Effect of construction workforce on the temporary accommodation market

7.79 A number of the construction workforce are expected to be non-home based and will require temporary accommodation near to the Site. Information on the existing accommodation market in the CSA (considered to be the location that most non-home based workers will seek accommodation) has therefore been collected and is presented here.

Baseline

7.80 Table 7.12 summarises the estimated number of rooms in the CSA across various forms of accommodation which could be feasibly utilised by construction workers given existing occupancy rates and the construction worker budget. Appendix 7.8: *Construction Workforce Accommodation Strategy* (document reference 6.2.7.8) presents the detailed methodology and assumptions behind these estimates. Overall, there are estimated to be 5,400 available and affordable rooms within the CSA, the majority of which (86%) are in the Private Rented Sector. Consultation with Locate in Kent, Visit Kent, the local host authorities and EDC confirmed a constrained accommodation stock.

Table 7.12 Summary of accommodation stock in the CSA and those which are available and affordable for construction workers

	Total rooms	Availability	Affordability	Available and affordable
Tourism	3,000	*	*	75
Private rented sector (PRS)	57,400	8%	100%	4,600
Owner occupied sector (OOS)	108,000	1%	50%	700
Total	168,700	-	-	5,400

Sources: Visit Kent, 2019, *Accommodation Audit*; Visit Britain, 2016, *Accommodation Stock Audit*; airdna.co.uk, 2020; ONS, *Subnational dwelling stock by tenure estimates, 2018*.³⁷ Volterra calculations. Appendix 7.8: *Construction Workforce Accommodation Strategy* (document reference 6.2.7.8) contains a

³⁷ These research outputs are not official statistics on dwelling stock by tenure.

thorough description and basis for all assumptions made and sources used. Note * indicates different availability and affordability metrics were applied to different types of tourism accommodation – Appendix 7.8: *Construction Workforce Accommodation Strategy* (document reference 6.2.7.8) provides details of the metrics used and the basis for them.

Future baseline – temporary accommodation market

7.81 Cumulative schemes are expected to require an estimated 630 workers in 2023 and 210 in 2028 which could require some form of temporary accommodation. Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) provides more detail on the assumptions underpinning these estimates. The cumulative schemes will place additional pressure on the existing accommodation market, decreasing available and affordable stock in the absence of any on-site mitigation at those schemes (none is anticipated). Whilst further provision is anticipated (hotels are planned and non-serviced accommodation is expected to grow), it is conservatively assumed that none occurs in the future baseline.

Sensitivity

7.82 The availability and affordability of the accommodation stock is similar to other areas. However, it has a relatively low absolute level of hotel room stock, and the available and affordable distribution is therefore heavily reliant upon the PRS. Bearing in mind the low absolute levels of provision and the high reliance on one key type of stock, it is concluded that existing and future homes and residents within the CSA have a **medium** sensitivity to temporary construction workforce temporary accommodation effects.

Displacement/loss of business and other services

7.83 The London Resort will result in the displacement of businesses and services, which might be able to relocate or may be lost. Baseline information on these existing businesses is presented here.

Baseline

7.84 The methodological approach undertaken in this assessment aims to identify current occupiers on an individual level by cross-referencing VOA commercial addresses with other supplementary commercial databases, including land referencing work undertaken by LRS (*Book of Reference* (document reference 4.3)). This has been done to gain a more detailed understanding of the sectors that these businesses operate in and the services that they provide to the local and wider community. The methodology behind this approach has been briefly explained below, and in further detail in Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3).

Estimating businesses located within the PSB

7.85 A comprehensive list of businesses and services that are contained within the PSB has been compiled to assess the extent of displacement. The primary source of data is the

VOA, which provides a summary list of registered non-domestic business premises across the UK. Current occupiers have been identified and verified by cross-referencing the premise address with several supplementary sources:

- Addressbase Premium;
- Companies House;
- Google Maps; and
- Information requests to land / interest owners by land referencing company LRS on behalf of the Applicant.

7.86 Floorspace areas from the primary VOA dataset have then been used to estimate the number of FTEs and jobs currently supported by these businesses. Overall, there is a total of approx. 69,100m² (NIA) of floorspace within the PSB (as detailed in Table 7.5, this is the order limits of the London Resort – the Project Site – which includes land on both the Kent and Essex sides of the Thames), of which 28% is deemed vacant.³⁸ Additionally, firms that engage in activities that can be classed as ‘bad neighbour’ uses have also been identified. These typically include businesses that are disruptive to residents who live nearby, particularly in terms of their impact on visual quality, noise and air pollution.

7.87 Some 94 businesses have been identified, supporting an estimated total of 1,040 FTEs which equates to 1,160 jobs.³⁹ This estimate is comparable with the estimated range of employees provided to the Planning Inspectorate by Bramwell Associates (who represent some owners and businesses likely affected) in June 2020 of between 1,000 and 1,500 employees.⁴⁰ As part of the land referencing process, occupiers were asked to complete requests for information (RFIs) which included asking about employment levels in each business. Very few answers were provided to this, but wherever they were, those reported figures have been used instead of making estimates. In most cases where a business did report an employment level, it was relatively in line with Volterra’s original estimates based on typical job densities, suggesting that these firms are operating at standard employment densities. This suggests that our overall job estimates are likely to be a sufficiently representative estimate of the jobs supported onsite.

7.88 At the individual business level, it is estimated that the average business supports approximately 12 jobs⁴¹, which indicates that the majority of occupiers are small enterprises.

³⁸ This vacancy rate was determined in July 2020

³⁹ 99.7% of the existing jobs are located at the Kent Project Site, with the few remaining jobs located at the Essex Project Site.

⁴⁰ Reply to written question - 07 July 2020 <https://infrastructure.planninginspectorate.gov.uk/projects/south-east/the-london-resort/?ipcsection=advice&ipcadvic=60e9228ac3>

⁴¹ This is at the firm level operating from the PSB. Some businesses are outlets of larger companies with other premises elsewhere. The information presented here all relates to employment estimated to be supported by the premises and operations physically within the PSB.

7.89 Of the 94 identified businesses, 32 have been classed as ‘bad neighbour uses’, equivalent to 34% of firms, which represent 41% of total occupied floorspace. These uses include heavy industrial functions such as concrete manufacturers, demolition services, metal scrap collectors, vehicle repair centres, and recycling plants. A sectoral breakdown of the occupiers within the PSB shows that 80% of all jobs supported by firms on-site are in industrial based sectors. The most prominent sectors include wholesale retail trade/repair of motor vehicles⁴² (31%), construction (19%), manufacturing (19%), and transport and storage (11%). Most of these firms are on the Northfleet Industrial Estate, Kent Kraft Industrial Estate, Galley Hill Industrial Estate and Manor Way Business Park.

Future baseline – businesses

7.90 The estimates of current workforce within the PSB are viewed as likely to be conservative in terms of job numbers which might be displaced. All users within the PSB are aware of the status of the project. It is thus considered unlikely that any additional workforce over and above the existing baseline estimated could be supported by the present uses, and so the future baseline position is assumed to remain the same as the current baseline. The effects are therefore assessed against the current baseline levels.

7.91 The EDC’s Ebbsfleet Implementation Framework 2017 indicates, for the six existing development proposals with consent, that there is consent for over 600,000 sq.m. of office floorspace and up to 28,000 sq.m. of retail.⁴³ It is understood, however, that EDC is working on a masterplan which will lead to a planning application for a more residential-led scheme.

7.92 Furthermore, a significant proportion (80%) of the floorspace within the PSB is utilised for industrial purposes. The loss of this industrial floorspace is therefore placed within the context of spatial substitution, which refers to recently emerging trends for industrial floorspace being displaced out of Greater London into surrounding areas within the industrial FEMA (functional economic market area), due to shifts in developmental patterns.⁴⁴ The biggest driver for this has been the demand for housing land and the much higher land values it commands compared to industrial. The Thames Gateway corridor has been identified as one of several regions in this economic area that supports a high concentration of displaced industry from London, particularly the areas that extend north and south of the Gateway to Essex and Kent.⁴⁵ However, findings on the availability and flexibility of land outside Greater London, shows that these extended areas of the gateway in the South-East have relatively limited ability to absorb ‘over-spill’ from London.⁴⁶ As a result, the displacement of industrial floorspace within the PSB might further exacerbate this trend by forcing firms to relocate to other areas along this already

⁴² Information on the sectoral breakdown of occupiers is based on the SIC (Standard Industrial Classification) codes that have been assigned to each business. The SIC codes utilized in this analysis (due to limited data availability) provide a ‘sectional’ breakdown of employment, meaning that some sectors may be grouped together into broader industrial categories.

⁴³ Ebbsfleet Development Corporation, Ebbsfleet Implementation Framework, 2017

⁴⁴ GLA, 2017, Industrial Land Demand, page 133

⁴⁵ GLA, 2015, London Industrial Land Supply & Economy Study, page 154

⁴⁶ GLA, 2015, London Industrial Land Supply & Economy Study, page 154

constrained industrial market corridor.

- 7.93 There are only two cumulative schemes in the PSB: the A2(T) Bean and Ebbsfleet Junction Improvements by Highways England and the mixed use development (phase 3 – 172 residential dwellings) of land west of Springhead Road in Northfleet. Neither of these schemes include the removal or provision of businesses. This means that cumulative schemes will not affect the future businesses baseline at the PSB level in 2022.

Sensitivity

- 7.94 The sensitivity of the businesses to displacement effects depends on the ability of these businesses to respond to change. For example, it will rely upon the businesses' ability to relocate where some businesses, such as a small office-based business, may find it easier to move to a different location as their product is less directly tied to their location. Others, such as those that rely on having a large quantum of storage space or 'bad neighbour' uses, may find it more difficult to relocate. Smaller businesses are also typically deemed more sensitive to relocation as they are typically more likely to be tied to local settings and less likely to have available resources to support a comprehensive search for new premises.
- 7.95 The sensitivity of local residents to business displacement effects depends on the economic importance of the business to residents who use these services and the availability of alternative provisions. This may also be greater if residents place a relatively high value on them due to ease of access and quality of service. There are however alternatives elsewhere within the CSA for many of the business services provided within the PSB and the types of services provided means that the frequency of use is limited.
- 7.96 Given the large proportion of the businesses which are 'bad neighbour', industrial uses and small businesses, the sensitivity of the businesses (and their workers) within the PSB at risk of displacement is deemed **high**.
- 7.97 At the CSA level, sensitivity of businesses, businesses supply chains and the residents who use the businesses are dependent on the strength of the CSA labour market. This is described in paragraphs 7.121 to 7.140. Furthermore, the sensitivity of the CSA to potential business displacement will depend upon the displaced businesses' ability to relocate within the CSA. The sensitivity of businesses and the residents who use them is **medium**.

Displacement / loss of / disruption to community uses

- 7.98 The London Resort will result in the displacement or disruption of some community uses (community facility, open space/marsh, PRow). Baseline information on these existing community uses is presented here.

Baseline

- 7.99 Based on data from *Addressbase*, there is one⁴⁷ community facility in the PSB at risk of displacement, which is a public convenience facility (i.e. public toilet).
- 7.100 Research suggests that it is best practice for one community centre to be provided for every 7,000 – 11,000 people residing in a community.⁴⁸ Earlier research by the same authors suggested that the catchment population required to sustain one community centre, in terms of viability, is approximately 4,000 people.⁴⁹ Within the CIA there are eight public / village halls or other community facilities, and the area has an approximate population of 69,500. This means that there is a community centre per approximately 8,700 residents in the area, within the optimum range indicated by research for both financial viability and best practice.
- 7.101 The PRoW assessment finds that there are 10 PRoWs and routes that will be affected by the London Resort.⁵⁰
- 7.102 There are 41 open spaces⁵¹ within the CIA, whilst no open space has been identified in the PSB. There are also three marshes which overlap with the PSB: Black Duck Marsh, Botany Marshes and Broadness Salt Marsh. These are identified in Table 7.14.
- 7.103 Maps of the community facilities, PRoWs and routes and open spaces are provided in Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3).

Future baseline – community uses

- 7.104 The Ebbsfleet Implementation Framework 2017 states that, for the six existing development proposals with consent, there is maximum consent for approximately 70,000 sq.m. of community floorspace. Of this, 50,000 sq.m. is at Eastern Quarry (along the bottom of the CIA) and 21,000 sq.m. is in Ebbsfleet Central (in the centre of the CIA).⁵²

⁴⁷ There were three community services/facilities within the PSB (a public convenience facility, Essandor Sports & Social Club, and a rifle range) that were identified in *Addressbase* as falling within the category of community services/facilities. The public convenience facility is likely to be a public toilet that provides either free or paid access in publicly accessible places. This therefore is a community facility at risk of displacement. Essandor Sports & Social Club and the rifle range were classed in *Addressbase* as historical entries. No evidence was found to verify the existence of these businesses. Whilst there is evidence of some historical entries that are still in operation, the formal land referencing study found no evidence of these businesses, nor are they present in any of the other supplementary sources. As such, it is assumed that these two sports-related facilities are not in operation and therefore they are not assumed to be displaced.

⁴⁸ Barton, Grant and Guise, 2010, *Shaping neighbourhoods for local health and global sustainability*

⁴⁹ Barton, Grant and Guise, 2003, *Shaping Neighbourhoods: A Guide for Health, Sustainability and Vitality*

⁵⁰ This is informed by a PRoW and route assessment by EDP. All remaining rights of way that are not discussed in this baseline are to be retained through both the construction and operation phase and are not considered to face significant impacts as a result of the London Resort.

⁵¹ The standard definition of open space, outlined in section 19 of the Acquisition of Land Act 1981, describes 'open space' as any land laid out as a public garden, or used for the purposes of public recreation, or land being a disused burial ground. In order to be conservative and comprehensive, the assessment conducted here is based on a wider definition based on the OS open space dataset (change as required) and includes other types of open space such as allotments, community growing spaces, and privately accessible recreational spaces.

⁵² Ebbsfleet Development Corporation, 2017, *Ebbsfleet Implementation Framework*

- 7.105 The Ebbsfleet Implementation Framework⁵³ will be used by the EDC to shape and support its plans. It has the ambition for the garden grid and major parks to focus on delivering an integrated blue and green network, connecting the city's parks and open spaces into a unified network which allows residents to travel across the city within green corridors. It also aims for seven city parks to be developed from existing open spaces within Gravesham and Dartford areas, providing areas for sports, play and informal recreation, as well as long distance views and ecological enhancement. Finally, it has the ambition that Swanscombe Peninsula Park, currently made of three marshes (Botany Marsh, Black Duck Marsh and Broadness Marsh), will be consolidated into one coherent ecological reserve. The proposals for the marshes being developed for this project give consideration to these ambitions.
- 7.106 Maps identifying proposed social infrastructure centres, green grid, major parks and routes within the EDC are provided in Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3).
- 7.107 The only cumulative schemes within the PSB are the A2(T) Bean and Ebbsfleet Junction Improvements by Highways England and the mixed use development (phase 3, comprising 172 residential dwellings) of land west of Springhead Road in Northfleet. The former does not include the removal or provision of any community uses. Phase 3 of the latter will facilitate access to existing and proposed facilities on Springhead Park with a strategic PRoW network, as well as providing open space.
- 7.108 Additionally, 10 cumulative schemes have been identified within the CIA or in proximity of the boundary, all of which may have potential impacts on the provision of community uses, PRoWs and open space. This group of schemes includes Eastern Quarry, The Pier in Greenhithe, Northfleet Embankment, Land at Coldharbour Road in Northfleet, Chadfields in Tilbury, Land west of Lytton Road in Chadwell St Mary, Star Industrial Estate in Chadwell St Mary, Land Part of Little Thurrock Marshes in Grays, Land at Former Northfleet Cement Works and the Former Croxton & Garry Site Tiltman Avenue in Swanscombe. More detail on the proposals outlined by each scheme can be found in Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3).

Sensitivity

- 7.109 The assessment of the effects of the London Resort on community facilities, open space (including marshes), and PRoWs and routes is undertaken on an individual basis, and therefore each community use (along with its users) forms its own receptor. The basis for determining the sensitivity levels for community receptors are given in Table 7.13.

⁵³ Ebbsfleet Development Corporation, 2017, Ebbsfleet Implementation Framework

Table 7.13 Definitions of sensitivity levels of community facilities, open spaces, PRowS and routes

Sensitivity	Definition
High	The community use is regularly used and highly valued by residents of the local community and is particularly important for residents with specific needs (such as children or people living with a disability). A lack of alternative facilities within a reasonable geographical distance may be another reason to define the receptor as highly sensitive. It represents a community receptor of high importance. The receptor is very sensitive to most temporary or permanent changes, over the whole receptor, and/or very sensitive to alteration of key characteristics or features of the receptor’s character or distinctiveness. The effect of changes to the receptor would be highly noticeable, possibly due to no surplus capacity/high scarcity.
Medium	Users of the community use have some, although limited, alternatives to similar uses available to them, and/or the use is reasonably well-used and valued by the local community. It represents a community receptor of moderate importance, which is sensitive to certain temporary or permanent changes, over the majority of the receptor, and/or sensitive to alteration of key characteristics or features of the receptor’s characteristics or distinctiveness. Changes to the receptor would bring about noticeable changes in the study area.
Low	There are some alternatives available to local residents within the geographical area, and/or the community use is not often used by the community. The receptor is of low importance, with some sensitivity to some specific types of change, over a minority of the receptor, and/or limited sensitivity to the alteration of key characteristics or features of the receptor’s character or distinctiveness. The receptor is therefore relatively insensitive to changes in baseline conditions.
Negligible	The community use is seldom used by the local community, and/or there are a large number of alternative and comparable uses available to residents. The receptor is not sensitive to change in baseline conditions, with potential exception of specific aspects, over a small area of the receptor, and/or does not contain any key characteristics or features of a particularly sensitive character or distinctiveness.

7.110 The table above provides a description of each community use that is due to be affected by the London Resort. The location of these uses is shown on Diagram 7.3.5 in Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3). This assessment considers all community uses within the CIA that are affected by the London Resort. This could include uses on the Kent or Essex Project Site, though no community uses are expected to be affected on the Essex Project Site.

7.111 Sensitivities have also been assigned to each entity, based on the above criteria. This includes the availability of alternative options within a reasonable distance and the potential importance or value that local residents might place on these services. This is informed by the landscape work carried out by the Applicant’s landscape consultants.

Table 7.14 Allocation of sensitivities for community facilities, PRowS, routes and open spaces affected by the London Resort

Community use	Local authority	Description	Sensitivity
Community facilities			
Public convenience facility	Dartford	Free or paid access in publicly accessible places such as a street, shopping mall, or bus/rail station. I.e. public toilets.	Low – Two other public convenience facilities are situated within the CIA. The closest one is approx. 750 metres from the displaced facility. The other is 2km away from the displaced facility. Policy guidance ⁵⁴ indicates that a public toilet should be provided every 3 miles (4.8km) along main roads.
PRowS / routes			
DS1	Dartford	Footpath. Clear path along existing flood defence. Seems to have been diverted along disused road and signage seems to suggest the same. Footpath follows a gravel track than changes to a worn grass path. The footpath is clear of vegetation and clearly highlighted through signage. Moderate to poor condition	Medium – well used by residents and workers. Multiple walkers and two dog walkers. Higher priority users (children) have alternative spaces nearby, outside the Project Site.
DS2	Dartford	Footpath. No sign at junction with DS1 and overgrown vegetation made the path hard to find. Path was well worn with overgrown vegetation lining both sides. In winter, entirely waterlogged along course to junction with Manor Way Mainly connects to the industrial area (not considered a key destination) Moderate to poor condition	Low – limited use due to flooding and route. Higher priority users (children) have alternative spaces nearby, outside the Project Site.
DS12	Dartford	Footpath. Signage from manor way identifies clear path. Part of the path appear to have been diverted along onto a disused hard surfaced track where vegetation has blocked the correct path. Northern section is a clear and worn path with signage at either end. Footpath was impassable at northern end due to overgrown vegetation. Clear route but unused and waterlogged in sections. Mainly connects to the industrial area (not considered a key destination) Moderate to poor condition	Low – limited use due to flooding and route. Higher priority users (children) have alternative spaces nearby, outside the Project Site.
DS17	Dartford	Footpath. Surfaced, signposted, clear direct route.	Medium – good condition route. Higher priority users (children) have alternative

⁵⁴ British Standards Institute (BSI), 2010, BS 6465-4 Sanitary installations: Code of practice for the provision of public toilets

Community use	Local authority	Description	Sensitivity
		Good condition	spaces nearby, outside the Project Site.
DS30	Dartford	Footpath has been blocked using a concrete block and is therefore impassable at northern end. Path still appears used with worn track. Poor condition	Medium – relatively well used. Higher priority users (children) have alternative spaces nearby, outside the Project Site.
DS31 – Pilgrim’s Way	Dartford	Footpath. Clear signage from Manor Way indicates footpath from Manor Way. The path is mostly well surfaced with hard boundaries on either side. Several steps in disrepair are located at the northern end of the path. Signage from London Road/Galley Hill Road junction clearly indicates footpath. In summer, dead Elm within hedgerow alongside route and overgrown scrub give an unkempt appearance and reduce width and security of route. Moderate condition.	Medium – relatively well used. Higher priority users (children) have alternative spaces nearby, outside the Project Site.
Existing track at top left of Broadness Marsh	Dartford	Private access track providing access for residents of Broadness Creek and maintenance access to Leachate treatment, Radar Station and Lighthouse. Private area with signage stating that access is prohibited but unofficially used by walkers.	Low – limited users. Higher priority users (children) have alternatives nearby, outside the Project Site.
NU1	Gravesham	Footpath. Central part of path is impassable due to overgrown vegetation. A new connection between NU1 and Manor Way has been created to the north. Well used, surfaced. Shared surface with Manor Way. Good to poor condition.	Medium – relatively well used. Higher priority users (children) have alternative spaces nearby, outside the Project Site.
The network of pathways through Botany Marsh	Gravesham	Frequently flooded	Medium – relatively well used. Higher priority users (children) have alternatives nearby, outside the Project Site.
Existing track at top of Broadness Marsh	Dartford/ Gravesham	Private mown grass access track used for security patrols and unofficially used by walkers.	Low – limited users. Higher priority users (children) have alternatives nearby, outside the Project Site.
Open spaces and marshes			
Black Duck Marsh	Gravesham	Relatively inaccessible due to water levels, although the northern side of the marsh has numerous pathways along the river and flood embankments that are frequently used by local people taking walks through the residential area of Ingress Park. Accessible by official Public Rights of Way (PRoWs) to the wider area. These PRoWs are reasonably well used.	Medium – well used by residents but partially inaccessible due to water levels.
Botany Marsh	Gravesham	A wildlife reserve managed by the Kent Wildlife Trust and primarily funded by the industrial owners, Britannia Metals. It consists of open waterbodies,	Medium – well used by residents but partially inaccessible due to flooding.

Community use	Local authority	Description	Sensitivity
		reedbeds and aquatic areas, scrub, wet woodland and shingle areas. A network of pathways provide access around the eastern perimeter and into the main marshland areas in the interior of the reserve (although it appears flooding is an issue that is impeding access). Accessible by official Public Rights of Way (PRoWs) to the wider area. These PRoWs are reasonably well used.	
Broadness Salt Marsh	Gravesham	Currently remote in character and flanked to the east by heavy industrial uses and to the south by further scrubby areas and wetland. The area has been artificially raised by landfill and industrial waste and is not publicly accessible through official paths, though it is understood that some people do use unofficial paths.	Low – not well used by residents and low accessibility.

Displacement of residential dwellings as a result of property acquisition

7.112 The construction of the London Resort will result in the displacement of some residents from their homes. The only homes to be affected are in Dartford, so this specific housing market is presented for this baseline. The baseline for the entire CSA housing market is presented in Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3). This effect is assessed at the local (Dartford) housing market level. The effect is assessed in 2022; the worst case year that the displacement could happen.

Baseline - Dartford housing market

7.113 In 2019, there were 47,300 dwellings in Dartford, 87% of which were in the private sector.⁵⁵ Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) finds that the Dartford vacancy rate (2.2%) is slightly lower than the England average (2.7%), but that housing in Dartford is far less affordable than the England average. It has higher median house prices (£311,000 compared to £240,000), a higher affordability ratio (9.3⁵⁶ compared to 7.8),⁵⁷ higher median monthly rents (£950 compared to £695) and higher proportion of gross monthly income spent on rent (33% compared to 27%⁵⁸).⁵⁹ This aligns with consultation feedback from Dartford Borough Council who note that whilst the borough meets its local housing need requirement, much of the new housing is being taken up by people moving out of London and is not affordable to many local residents.

7.114 Dartford has a comparatively higher rate of rough sleepers (0.27 per 1,000 households) and number accepted as homeless (2.20 per 1,000 households) than England (0.24 and 2.03 respectively), but a lower rate of those in temporary accommodation (1.18 per 1,000 households) than England (2.22).⁶⁰ Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) contains more detail on the Dartford housing market.

Future baseline - Dartford housing market

7.115 In terms of future housing need, the Dartford five year housing supply (2019 – 2024) identified a requirement for 4,184 additional dwellings within the borough: an average of 837 per year. If all were delivered at this rate, by 2022 Dartford could have added 2,510 additional dwellings. The borough identified 4,718 deliverable dwellings over the five year period, equating to 113% of the requirement. Of these 4,718, 3,674 dwellings are forecast at sites where construction has already commenced.⁶¹ This suggests that a large proportion will have been delivered by 2022. The inclusion of these housing projections

⁵⁵ MCHLG, Live tables on dwelling stock (including vacants), Table 100 Dwelling stock: Number of Dwellings by Tenure and district: England, 2019

⁵⁶ The affordability ratio was 9.3 in Dartford in 2019, meaning that a Dartford resident on a median wage would need just over nine years' worth of income to afford a house.

⁵⁷ MCHLG, Median house price to residence based earnings, 2019

⁵⁸ Where 30% is considered affordable

⁵⁹ ONS, Percentage of renters' median monthly household income spent on median monthly rent, by region, England, FYE 2018

⁶⁰ Local Authority Homelessness Statistics (England), 2019

⁶¹ Dartford Borough Council Five Year Housing Supply 2019 – 2024

means that the future baseline is inherently cumulative.

Sensitivity - Dartford housing market

7.116 Dartford appears to have a fairly strong housing market with identified sufficient housing supply over its five year plan, with growth expected through to 2022. However, there are identified issues with affordability and new housing is not affordable to many local residents. Given this, the Dartford housing market is considered to have a **high** sensitivity to dwelling displacement effects.

Potential temporary or permanent disruption to housing delivery as a result of the land take and construction works

7.117 The London Resort includes the construction of a multi storey car park and the London Resort Access Road. This land take could inhibit housing delivery in the area. Also, the access road could indirectly interrupt housing delivery in the Station Quarter South neighbourhood identified in the Ebbsfleet Development Framework 2017. Housing delivery is planned at a local authority level. The parts of the Ebbsfleet Development Framework which could be impacted in this way are located within Dartford, and so the study area is Dartford.

Baseline

7.118 The Ebbsfleet Garden City is aiming to deliver up to 15,000 new homes by 2035.⁶² Of the 11,500 consented (maximum parameter), 84% are in Dartford and 16% in Gravesham.⁶³ As noted above at 7.114 and 7.115 Dartford has a highly sensitive housing market and, whilst it has a strong housing market with sufficient identified housing supply over the five year plan period, the Garden City's future housing delivery is crucial to Dartford achieving its future targets for new homes. Of the (maximum) 11,500 homes consented across the Garden City, 2,320 of them are allocated on the two areas (SQS and SQN) which could be impacted by London Resort's PSB (both of which fall within Dartford); specifically 1,390 in Station Quarter South and 930 in Station Quarter North.⁶⁴

Future baseline

7.119 There are not expected to be any further significant housing allocations in the SQS and SQN zones that could be potentially be affected by the London Resort. However, it is understood that EDC is working on a masterplan which will lead to a planning application for a more residential-led scheme, and with potential greater intensification of residential uses. It is therefore possible that more of the Garden City's homes could be delivered elsewhere across the masterplan and not on the areas of land which are impacted by the London Resort, thus reducing the potential sensitivity of these areas and potential for any

⁶² Ebbsfleet Development Corporation, 2020, The Vision. Retrieved from <https://ebbsfleetdc.org.uk/the-vision/>. Accessed December 2020.

⁶³ Ebbsfleet Development Corporation, 2017, Ebbsfleet Implementation Framework

⁶⁴ Ebbsfleet Development Corporation, 2017, Ebbsfleet Implementation Framework

adverse impact.

Sensitivity

7.120 The delivery of housing in the area is of high importance and any disruption could have indirect effects for residents in terms of access to affordable housing, which is a highly sensitive issue (paragraphs 7.153 to 7.162). Overall, residents and homes are expected to have a **high** sensitivity to disruption to housing delivery at the Dartford level.

BASELINE CONDITIONS - OPERATION

Employment generation and labour markets, skills and training

7.121 The operational phase of the London Resort is expected to support a large number of staff, a large proportion of which are expected to be CSA residents. The following section considers baseline information about the labour market to inform this effect. The operational phase of the London Resort will also provide significant learning opportunities for its employees to upskill and train, reaching higher levels of qualification and, subsequently, improving employability and incomes.

7.122 The baseline for these two employment effects is not split by effect but by residential and workplace based employment data. Sensitivities are then concluded for all relevant receptors and study areas.

Baseline – residence based

7.123 The CSA has a higher economic activity rate compared to the national average. The unemployment rate is also marginally higher in the CSA than both the LCA and national average. The claimant rate is similar across all geographies. Far fewer CSA residents are qualified to NVQ4+ level than geographical comparators.

Table 7.15 Summary of key residence-based socio-economic indicators at the CSA, LCA and national levels.

	CSA	LCA⁶⁵	National
2019 population	393,900	8.4m	66.8m
Population density – residents per hectare	11.8	13.7	2.8
% growth since 2009	12%	13%	7%
2019 working age population (16-64)	246,500	5.5m	41.7m
Economically active (% of working age population)	208,600 (85%)	4.4m (79%)	79%

⁶⁵ Economic activity statistics are only available at a local authority level. Therefore, for the LCA which does not align with local authority borders at its edges, statistics have been estimated. For all local authorities where at least 50% of their population is within the LCA, the proportion of the population that is economically active and employed is calculated, then applied to the known 2019 LCA working age population.

	CSA	LCA ⁶⁵	National
Employed (% of working age population)	199,900 (81%)	4.2m (76%)	76%
Employment density – workers per hectare	4.9	7.9	1.3
% of residents qualified to NVQ4+ level	33%	45%	40%
Residential and worker earnings (% difference to UK)	+5%	+5%	£30,400
Unemployed (% of economically active)	8,700 (4.2%)	173,000 (4.0%)	4.0%
Residents not in education, employment or training (NEET) (% of 16-17 year olds)	*	3,720 (5.1%) in the SRCA	5.5%
2019 Claimants (% of 16-64 population)	6,000 (2.6%)	143,000 (2.6%)	1.1m (2.6%)

Sources: ONS, Mid-year population estimates, 2019; ONS, Annual Population Survey, 2019; ONS, Business Register and Employment Survey, 2018; ONS, Census Table QS102UK, 2011; ONS, Annual Survey of Hours and Earnings, 2019; ONS, Claimant Count, 2019. *denotes data unavailable.

7.124 The Bank of England reports that, on average, every quarter around 6% of working-age people within the UK move between the three labour market states: employment, unemployment and inactivity, suggesting that there is some turnover in the labour market. A further 2% move between jobs.⁶⁶ The ONS found that 29% of workers have a different employer to the one they had 12 months earlier, and 6% of workers had moved from being employed to not in employment.^{67, 68}

Education

7.125 Most relevant to the development of skills are higher education institutions and other education and training bodies. However, this subsection also discusses early years and school aged provision so that all education baseline is in one place. The early years and school aged provision is relevant to the potential operational effect on public services (7.200).

7.126 Across the CSA there are six colleges/further education establishments (three in Dartford, two in Gravesham, and one in Thurrock). A diverse range of courses is on offer at these colleges. For instance, North Kent College offers hospitality and catering professional development courses, and Dartford Science and Technology College offers vocational courses in digital technology and travel and tourism,⁶⁹ whilst the Leigh University Technical College (UTC) offers programmes with a focus in engineering and computer science.⁷⁰ Northfleet Technology College also provides courses that are more creative-based such as art and design as well as languages (French and Spanish). Vocational courses on retail, catering and hospitality can be taken at LINK19 College in Gravesham, whilst the National College for the Creative and Cultural Industries in Thurrock works

⁶⁶ Retrieved from <https://www.bankofengland.co.uk/monetary-policy-report/2020/january-2020/in-focus-the-labour-market>. Accessed June 2020.

⁶⁷ ONS, Employee turnover levels and rates by industry section, UK, January 2017 to December 2018

⁶⁸ ONS, Employee turnover levels and rates by industry section, UK, January 2017 to December 2018

⁶⁹ Dartford Science and Technology College, Post 16 Course Directory 2020/21

⁷⁰ <https://theleightuc.org.uk/post-16/>

alongside employers to provide high-quality training to the creative sectors. Further opportunities to attain higher education are also provided across the Thames Estuary, with 63 further and higher education institutions situated within the region, some of whom specialise in creative industries and have a key role to play in the region's future development.

- 7.127 Other local bodies that offer vocational training and/or matching between people and opportunities include the Education People, West Kent Partnership, and Careers and Enterprise Company. These bodies are proposed members of the London Resort Employment and Skills Taskforce. The Taskforce has been formed to provide guidance on the development of the Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7). The group has already brought together schools, colleges and higher education providers in a series of workshops which have informed, and will continue to inform, the education proposals outlined in this strategy.
- 7.128 An assessment of early years provision across the CSA shows that approximately 15,430 children aged 0-4 may require early years places,⁷¹ whilst the supply of registered places is estimated to be 13,200. This results in an operating deficit of 2,230 places across the CSA. On an individual local authority basis, Dartford is currently operating with a surplus of places, whilst Gravesham and Thurrock are relatively constrained with excess demand for places.
- 7.129 In terms of education provision, Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) finds that there are seven primary schools in the CIA (four of which are in Dartford, two in Gravesham, and one in Thurrock), supporting 2,275 students with 2,496 capacity. This equates to 91% operating capacity; slightly lower than the CSA and England and Wales (92%). There is also one secondary school within the CIA (in Dartford), which is operating at 83% of capacity compared to 92% for the CSA and 85% for England and Wales.⁷² None of these schools lies within the PSB. There are no special education needs schools, higher education institutions or universities within the CIA.

Vocational opportunities

- 7.130 The area currently suffers from a lack of vocational opportunities for both young people and adults.⁷³ Nationally, a third of young people (15-19 year olds) choose vocational pathways. This equates to 81,000 across the SELEP area. However, there is a general shortage of qualified trainers aligned to growth sectors, exacerbated by, and impacting upon, skills shortages in industries.⁷⁴

Future baseline – residence based

- 7.131 Table 7.16 shows that, in all assessment years, the CSA is expected to have higher

⁷¹ This is modelled demand based on take up rates, accounting for stay at home parents and the general part time nature of demand.

⁷² Edubase 2020

⁷³ KCC, 2017, Revised 14-24 learning, employment and skills strategy 2017-2020

⁷⁴ SELEP, 2018, South East LEP Skills Strategy 2018 - 2023

population and working age population growth than the LCA, and both geographies are higher than England. This is likely due to the substantial development planned in the CSA, most notably Ebbsfleet Garden City.⁷⁵ The high growth will increase demand for jobs and worker availability. This report found no data to inform the future baseline on skills and training across the general population, and effects are assessed against the current baseline levels.

Table 7.16 Projected population in the CSA, LCA and England for key assessment years and cumulative growth from 2018

		2018	2022	2023	2025	2028	2030	2038
All ages	CSA	389,000	405,000	409,000	415,000	424,000	429,000	447,000
			4%	5%	7%	9%	10%	15%
	LCA	8.4m	8.6m	8.7m	8.7m	8.8m	8.9m	9.2m
			3%	4%	5%	6%	7%	10%
	England	56.0m	57.3m	57.6m	58.1m	58.8m	59.2m	60.8m
			2%	3%	4%	5%	6%	9%
16 to 64	CSA	244,000	253,000	256,000	260,000	265,000	268,000	277,000
			4%	5%	7%	9%	10%	13%
	LCA	5.5m	5.6m	5.6m	5.7m	5.7m	5.8m	5.8m
			2%	3%	4%	5%	5%	7%
	England	35.0m	35.5m	35.6m	35.8m	36.0m	36.0m	36.1m
			1%	2%	2%	3%	3%	3%

Source: ONS, Population projections - local authority based by single year of age, 2018; Volterra calculations. Notes: These projections have been sense checked against the Ebbsfleet proposals and they appear broadly consistent with the anticipate population growth planned within the EDC.

7.132 The Dartford Borough Council Infrastructure Delivery Plan⁷⁶ states that there is to be a 2FE primary school in the Northern Gateway by 2020. However, this is outside the CIA, near Dartford Town Centre. A 4 to 8 form of entry (FE) secondary school at Alkerden (Eastern Quarry) will be delivered (4FE by 2021) to meet demand from the growing population of Ebbsfleet Garden City and potentially some demand from outside this area. Eastern Quarry itself will deliver two primary schools by 2022-2027 (phased delivery with 1FE at first, then 1FE in line with the housing development), to meet demand from the later phase of the project. Finally, an 8FE secondary school is to be delivered in Stone

⁷⁵ These projections have been sense checked against the Ebbsfleet proposals and they appear broadly consistent with the anticipate population growth planned within the EDC.

⁷⁶ Dartford Borough Council, 2019, Infrastructure Delivery Plan

(just outside the CIA), in order to meet demand from nearby housing growth and demographic changes. This will be delivered by 2021-2023.

Baseline – workplace based

7.133 As noted earlier in this chapter, there are estimated to be 1,160 workers currently employed by firms across the PSB. Paragraphs 7.84 to 7.89 in this chapter and Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) contain more detail on the existing businesses and workers.

7.134 The table below outlines key workplace based employment indicators. Detailed data are provided in Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3). The CSA worker population has grown faster than GB since 2009 and has a higher proportion of retail, transport and storage and construction workers than GB. The apprenticeship start rate is at 15.3 starts per 1,000 workers – higher than the national average (14.0). The four year annual achievement rate for the CSA (58%) is in line with the national average. The other apprenticeship indicators at the CSA level are generally on a par with the national average, including the proportion of starts in leisure, travel and tourism (2%), and proportion of starts at each level and age. Whilst data on starts per 1,000 workers are not available at industry level, it is notable that by comparison that tourism makes up approximately 10% of employment in England.⁷⁷ In Thurrock, the figure is 17%, which is slightly higher than the average in Dartford (8%-13%) and Gravesham (3%-6%).⁷⁸ This suggests a shortfall in start provision in this industry.

Table 7.17 Summary of key workplace based socio employment indicators at the CSA, LCA and national levels

	CSA	LCA	National
Workers	163,000	4.9m	30.8m
% growth since 2009	16%	*	11%
% employed in retail	15%	9%	9%
% employed in transport and storage	12%	5%	5%
% employed in construction	8%	5%	5%
Businesses	15,000	*	2.7m
Apprenticeship starts	2,490	*	376,000
Starts per 1,000 workers	15.3	*	14.0
Apprenticeship achievements	1,630	*	276,000
Four-year annual average achievement rate	58%	*	58%
% of starts in leisure, travel and tourism	2%	*	2%
% starts per level (intermediate: advanced: higher)	39:47:14	*	43:44:13
% starts per age group (under 19: 19-24: 25+)	30:31:39	*	28:30:41

Sources: ONS, 2018, *Business Register and Employment Survey*; Department for Education, *Apprenticeships*

⁷⁷ ONS, 2014, *Tourism employment summaries: Characteristics of tourism industries*

⁷⁸ Destination Research, 2017, *Economic Impact of Tourism in Kent*.

and traineeships data, 2019. Note *denotes data unavailable

- 7.135 It is estimated that, across the UK, there are currently 1 million people on zero hours contracts,⁷⁹ equivalent to 3% of the total workforce. 16-24-year olds represent 36% of all those on zero hour contracts despite only representing 11% of the total workforce, implying that young workers are more likely to be on these types of contracts.
- 7.136 In terms of out-commuting, the CSA suffers from very high levels of out-commuting given the proximity to London. The table below shows the out-commuting proportion for each of the CSA local authorities and the proportion that are working in London. Overall, it can be seen that every local authority in the CSA has a higher proportion of residents commuting out of the borough than the UK average of 46%.

Table 7.18 Out commuting in the CSA

	Out commuting	% to London
Dartford	66%	47%
Gravesham	66%	34%
Thurrock	54%	34%
South East	51%	12%
UK	46%	15%

Source: Census, 2011

Future baseline – workplace based

- 7.137 Table 7.19 shows employment projections by assessment year for the CSA and UK. Due to data limitations, forecasts have been estimated using the implied compound annual growth rate (CAGR) from several different sources.⁸⁰ Based on the forecasts, employment in the CSA is expected to grow by an average rate of 1.3% a year, which is higher than the national annual growth rate (0.5%). The inclusion of the projections means that the baseline is inherently cumulative for employment and skills effects.

⁷⁹ ONS, 2020

⁸⁰ These projections have been sense-checked against the Ebbsfleet Garden City proposals and they appear broadly consistent with the anticipated population and employment growth planned within the EDC.

Table 7.19 Workplace based employment projections by assessment year for the CSA and national levels, in the absence of the London Resort

Area	Implied CAGR	2018	2022	2023	2025	2028	2030	2038
Thurrock Forecast growth in labour force in the 2017 SHMA (2014 – 2037). ⁸¹	1.1%	68,000	71,000	72,000	73,000	76,000	77,000	84,000
Gravesham Forecast jobs growth from the North Kent Strategy Housing and Economic Needs Assessment (2012-2028). ⁸²	0.9%	33,000	34,000	34,000	35,000	36,000	37,000	39,000
Dartford Forecast jobs growth in Dartford between 2013 and 2031. ⁸³	1.8%	61,000	66,000	67,000	69,000	73,000	76,000	88,000
CSA Sum of the above	1.3%	162,000	171,000	173,000	178,000	185,000	190,000	211,000
National Forecast jobs growth from the OBR between Q1 2018 and Q1 2024. ⁸⁴	0.5%	32.3m	32.9m	33.0m	33.4m	33.7m	34.1m	35.4m

Notes: These projections have been sense-checked against the Ebbsfleet Garden City proposals and they appear broadly consistent with the anticipated population and employment growth planned within the EDC.

Sensitivity – workplace-based employment

7.138 Overall, there has been recent growth in the LCA and CSA workforces and the high employment growth anticipated to 2038. However, the high levels of CSA out commuting are raising concerns that the area around Ebbsfleet is becoming a commuter hub for London rather than making use of its proximity to London to establish employment opportunities of its own. Given this, existing and future workers within the CSA are expected to have a **medium** sensitivity to employment effects. The LCA and national levels are expected to have **low** sensitivity to employment effects.

Sensitivity – residence-based employment

7.139 Considering their economic activity and the future anticipated growth in the population and working age population (labour force), existing and future residents within the CSA and LCA are expected to have a **medium** sensitivity to local employment effects.

⁸¹ Turley Economics (2017), Addendum to the South East Strategic Housing Market Assessment. Table 3.2.

⁸² GVA (2017), North Kent Strategic Housing and Economic Needs Assessment: Employment Land Needs Assessment. Table 24.

⁸³ Kent County Council, Understanding Kent and Medway's growth requirements, 2015

⁸⁴ Office for Budget Responsibility, The Economy Forecast, Labour Market. Retrieved from <https://obr.uk/forecasts-in-depth/the-economy-forecast/labour-market/>. Accessed July 2020.

Sensitivity – residence based skills

7.140 CSA residents suffer low qualification levels relative to national average. There are a lack of vocational opportunities in the area for both young people and adults. Overall, it is expected that existing and future residents and skills providers within the CSA are expected to have a **high** sensitivity to skills and training effects.

Potential effects of trade creation and diversion relating to theme parks

7.141 The London Resort will provide a tourist attraction unlike any that currently exists in the UK – creating trade for a type of leisure destination which doesn't currently exist. It may also attract some trade away from similar attractions that already exist in the UK. Existing provision of theme parks at different spatial levels is therefore examined in this section.

Baseline***Global provision – theme parks***

7.142 In 2019, visitor numbers to the top 25 global theme park attractions (by visitor number) ranged from 4.9m (Chimelong Paradise, Guangzhou, China) to 21m (Magic Kingdom Theme Park at Walt Disney World Resort, Lake Buena Vista, Florida, U.S.A.).⁸⁵ The London Resort is expecting to attract roughly 6.5m per year in opening year and 12.5m by maturity, therefore within this range of visitors per year, hence would be considered a global attraction. None of the current top 25 theme parks is in the UK. The closest is Disneyland Paris and Walt Disney Studios Park (at Disneyland Paris) in France (9.7m and 5.2m visitors respectively). Over time, attendance at the top 25 global theme parks has been growing, from 187m in 2006 to c. 254m in 2019. Attendance as a proportion of total population has also been increasing, from 2.8% in 2006 to 3.3% in 2019.

7.143 For these top 25 global theme parks, Table 7.20 provides a measure of the theme park provision per million population and per million tourist arrivals. The provision on these metrics across the nine countries in which the 25 theme parks are located varies. In reality theme parks attract visitors from a variety of markets, and the penetration rates vary by theme park and by visitor category. These indicators are nevertheless indicative of the ranges of potential population and tourist numbers which can support theme parks of a global calibre. Applying these metrics to the UK's population and tourism arrivals indicates that the UK could support 2-3 global calibre theme parks.

⁸⁵ Aecom, Theme Index, 2019

Table 7.20 Global (top 25) theme park provision per million population and tourism arrivals

	Count of (top 25) global theme parks	Population (2019) (million)	Count per million population	Tourism - International Arrivals (2018)	Count per million arrivals
US	9	328	0.03	80	0.11
Japan	4	126	0.03	31	0.13
China	4	1,398	0.00	63	0.06
France	2	67	0.03	89	0.02
Hong Kong	2	8	0.27	29	0.07
South Korea	2	52	0.04	15	0.13
Germany	1	83	0.01	39	0.03
Netherlands	1	17	0.06	19	0.05

Sources: Aecom Global Attractions Report, 2019; World Bank Population Statistics, 2019; World Bank Tourism Arrival Statistics, 2018

EMEA provision – theme parks

- 7.144 If the geographical consideration is narrowed to Europe, Middle East and Africa (EMEA), England has more of a presence. According to Aecom, of the top 20 EMEA amusement/theme parks in 2019 (by visitor number), four are in England (Legoland Resort, Alton Towers Resort, Thorpe Park Resort, and Chessington Resorts), in places 9, 13, 16 and 20 in the list.⁸⁶
- 7.145 These are England’s current top performing resorts, each attracting between 1.7m and 2.4m visitors in 2019. Legoland Resort attracted the highest number of visitors at 2.4m, which equates to around half the lowest visitor number seen in the top 25 global attractions – 4.7m at Chimelong, China. All four of these are owned and operated by the same company – Merlin Entertainments. The ‘Merlin Annual Pass’ enables visitors to visit any Merlin attraction or resort over the course of the membership, and therefore the visitor numbers are also likely to be inter-related.

UK provision – theme parks

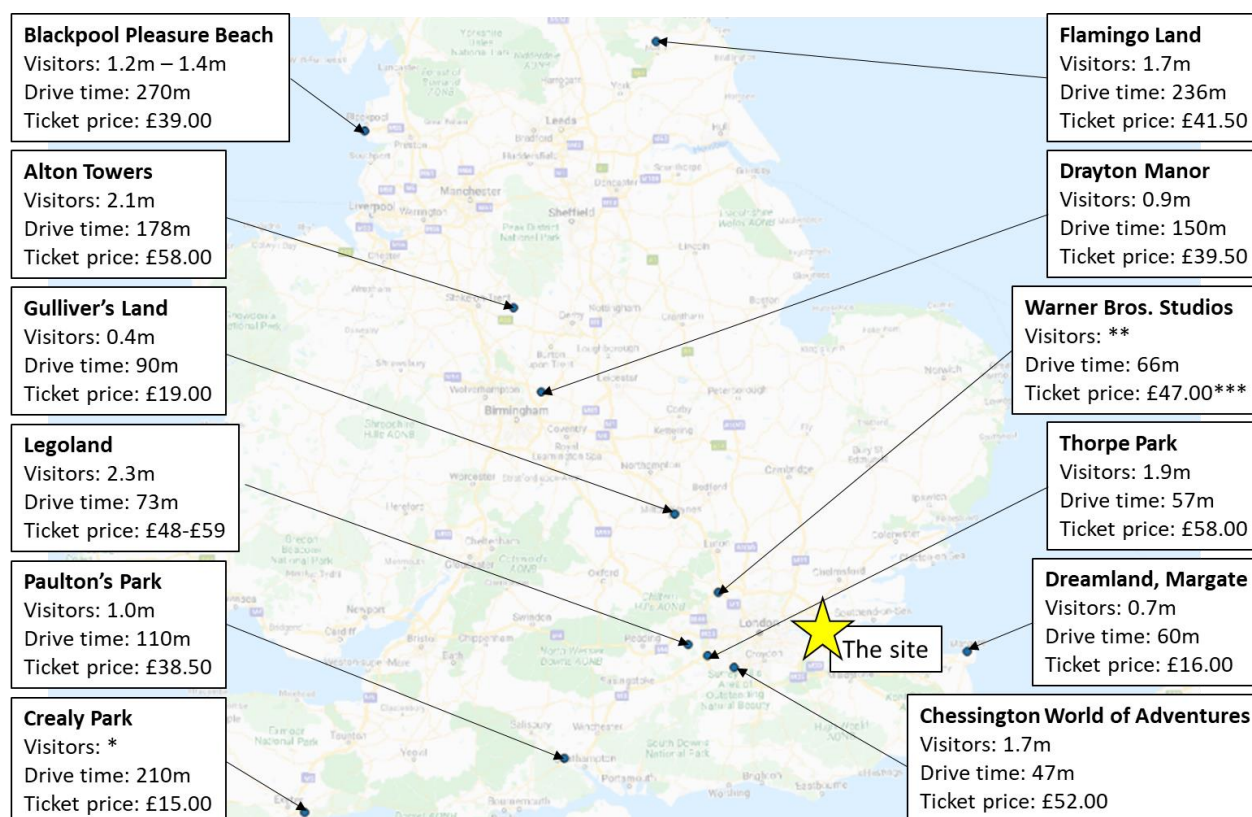
- 7.146 Diagram 7.2 shows the UK’s top attractions (by visitor number), where the top four are those identified by Aecom. Prices for each attraction have also been outlined for each attraction. The closest other attractions to the London Resort are three of the Merlin resorts (excluding Alton Towers Resort) and Dreamland in Margate. These three Merlin resorts are already geographically closer to one another than they will be to London Resort. Dreamland Margate has struggled for many years and has been the subject of various reinvestments and regeneration strategies. Its fortunes have been on an upward trend, however. It attracted 650,000 visitors in 2019, which was its highest ever

⁸⁶ Aecom, Theme Index, 2019

number.⁸⁷

7.147 Annual visitor numbers are not available for the Warner Bros. Studios - *The Making of Harry Potter* tour in Hertfordshire, which opened in 2012 (and has been the subject of three expansions since in 2015, 2017 and 2019). Booking must be made online in advance, and it is frequently booked up months in advance, reflecting high demand. Paulton’s Park in Hampshire was attracting approximately 500,000 visitors per season, however with the opening of *Peppa Pig World* in 2011, visitors doubled to 1 million.⁸⁸ There is no evidence that the opening of either the Harry Potter studio tour or Peppa Pig World had an adverse impact on the visitor numbers at the Merlin Entertainments’ resorts. Both these examples indicate that, when a park with a well themed attraction is open, it can create a new visitor market.

Diagram 7.2 Top theme park attractions in England (by visitor number, 2019), price and distance to the London Resort



Sources: Volterra; Googlemaps; AECOM Global Attractions Attendance Report, 2019; Company websites.
 Notes: * denotes missing data. ** No annual figure available however capacity for 6,000 daily visitors and requirement for online booking only due to high demand and sold out days ***Must be booked online and in advance.

⁸⁷ Retrieved from <https://interpark.co.uk/dreamland-margate-enjoys-record-breaking-year/>. Accessed July 2020.

⁸⁸ Retrieved from <https://blooloo.com/features/paultons-park-peppa-pig-world-mancey/> Accessed July 2020

Water parks

7.148 According to Aecom, of the top 10 water parks in EMEA, none are in the UK.⁸⁹ The water park with the highest number of visitors in EMEA was Therme Erding, Germany, with 1.9 million visitors. The most well-known water parks in the UK include Waterworld in Stoke on Trent and the Wave in Coventry, offering six large slides, the UK's biggest wave pool, a lazy river, café, gym and spa.⁹⁰ There is also the Alton Towers water park in Staffordshire, which includes wild water features, rapids and slides. Coral Reef Waterworld in Bracknell attracted 460,000 visitors in 2018.⁹¹ There are also several others attracting similar visitor numbers, as well as 'destination' resorts such as Center Parcs in England and Bluestone in Wales which attract tourists and contain water park elements, as well as other leisure provision.

Future baseline

7.149 Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) provides examples of various UK theme parks and water parks which are investing to improve their offers, as well as some new and extended sites which will be opening across the UK. None of these will be direct comparators to the London Resort. Wider market trends indicate that global attendance, and associated spending, at theme parks is anticipated to grow steadily. Spending on theme parks and on leisure activities more generally has been rising and is predicted to continue to rise, as demand increases for 'experiences' rather than products. Deloitte reports that in 2017, UK spending on entertainment grew year on year by over 10% whilst spending on clothing grew only by 1.4% and on groceries by 3.8%.⁹² Research by Mintel finds that 65% of British adults would spend their money on experiences rather than possessions, rising to 72% for millennials.⁹³

7.150 As well as increased demand for and propensity to spend on leisure within the existing population, the national population is expected to grow (+9% by 2038) and the CSA population is growing at a faster rate than nationally (+15% by 2038). Furthermore, the Tourism Sector Deal states that, in 2018, the UK attracted 38 million international visitors, who added £23 billion to the economy, making tourism one of the country's most important industries and the third largest service export. Current forecasts predict the sector will deliver a 23% increase in inbound visitors by 2025, and domestic tourism is also set to increase by an estimated 3% per annum until 2025.⁹⁴ COVID-19 has had a major impact upon global travel, reducing optional (leisure) trips considerably. IATA forecasts

⁸⁹ Aecom Global Attractions Report, 2018

⁹⁰ Retrieved from <https://thewavecoventry.com/>. Accessed June 2020.

⁹¹ Retrieved from <https://www.bracknellnews.co.uk/news/17794658.bracknell-leisure-centre-coral-reef-visits/>. Accessed June 2020.

⁹² Deloitte, Experience is everything: The UK leisure consumer, June 2019

⁹³ Mintel, Healthy, Ethical and Experiential: The Holy Trinity of British Consumer Spending, July 2019

⁹⁴ Department for Business, Energy and Industrial Strategy, Department for Digital, Culture, Media and Sport, Policy Paper: Tourism Sector Deal, June 2019

that levels will return to pre-pandemic levels by 2024.⁹⁵

Sensitivity

- 7.151 At the national level, the UK does not have a theme park of global calibre. Its best performing resort attracts about half as many visitors as the smallest of the top 25 global theme parks. The UK's population and tourism levels suggest it could support 2-3 global theme parks. The future baseline trends highlight growing population and tourism, coupled with increased desire to have 'experiences' and associated rises in spending on leisure and entertainment. Based on this information, the sensitivity to trade creation at the national level is **high**.
- 7.152 England has four of the top 20 theme parks across the EMEA, equating to average park provision per million population compared to other EMEA countries. Theme park attendance has been growing over time with further growth expected through to 2026. The market is responding to this, with growth in theme park provision expected at a national scale, and considerable investment planned in the future baseline across the country. As the UK consumer spending profile, driven by the millennials, increases its emphasis on the experiential, demand for theme parks looks to have a strong future outlook. This is on top of high population growth expected at a national level. That said, some more local theme parks (for example Dreamland in Margate) have struggled in recent years to remain commercially viable. Overall, whilst many theme parks could be considered to exhibit low sensitivity to trade diversion, a cautionary approach is taken and existing and future businesses across the RCA are assessed to have **medium** sensitivity to trade diversion effects.

Potential effects of visitors and workers on local accommodation options and the housing market

- 7.153 There may be indirect effects on housing supply in the CSA as a result of the London Resort. This will include the impact both on quantum of housing demand (as a result of the workforce and visitors at the London Resort) and the impact on type of housing demanded. While the employment opportunities created by the London Resort will have a positive economic impact on the area, the workers and visitors attracted to the area may increase demand for housing, having an impact on current housing need (in terms of price, tenure, size etc) as well as the demand that arises from the London Resort. This will include potential impact on affordability, additional housing need and release of land for housing.

Baseline – the housing market

- 7.154 In terms of housing stock, there were 158,600 dwellings in the CSA in 2019, 84% of which

⁹⁵ IATA, 2020, Recovery Delayed as International Travel Remains Locked Down. Retrieved from <https://www.iata.org/en/pressroom/pr/2020-07-28-02/>. Accessed November 2020

were in the private sector, comparable to 83% across England.⁹⁶ The ONS estimates that, in the CSA, 68% of homes are owner occupied (compared to 63% in England) and 16% are in the PRS (compared to 20% in England).⁹⁷ According to MHCLG, the vacancy rate of dwellings in the CSA (2.2%) is slightly lower than the rate across England (c. 2.7%).⁹⁸

Table 7.21 CSA dwelling stock by tenure (local authority owned, private registered provider, other public sector, owner occupied and private rented sector), 2019

	Total dwellings	Local authority owned	Private registered provider	Other public sector	Owner occupied	Private rented sector
Dartford	47,300	4,200	2,000	0	35,100	6,000
		9%	4%	0%	74%	13%
Gravesham	43,569	5,689	1,771	7	29,133	6,969
		13%	4%	0%	67%	16%
Thurrock	67,734	9,847	2,045	0	43,991	11,851
		15%	3%	0%	65%	17%
CSA	158,600	19,800	5,800	10	108,200	24,800
		11%	4%	0%	68%	16%
England	24,414,000	1,587,200	2,561,000	41,700	15,338,600	4,827,300
		7%	10%	0%	63%	20%

Sources: MHCLG, Live tables on dwelling stock (including vacant properties), Table 100 Dwelling stock: Number of Dwellings by Tenure and district: England; 2019; ONS, Subnational dwelling stock by tenure estimates, England, 2019.

7.155 The table below summarises housing affordability metrics within the CSA. Homes in the CSA are far less affordable than the England average in both the PRS and OOS, with faster growth in house prices since 2010 relative to the national average.

Table 7.22 Summary of key housing affordability metrics (for owner occupied and private rented sector) in the CSA and England

	Dartford	Gravesham	Thurrock	CSA	England
Median house price (£ '000)	311	290	288	296	240
% growth since 2010	73%	66%	74%	71%	33%
Affordability ratio ⁹⁹	9.3	8.9	9.1	9.1	7.8

⁹⁶ MHCLG, Live tables on dwelling stock (including vacants), Table 100 Dwelling stock: Number of Dwellings by Tenure and district: England; 2019

⁹⁷ These research outputs are not official statistics on dwelling stock by tenure.

⁹⁸ MHCLG, Live tables on dwelling stock (including vacants), Table 615 All vacant dwellings by local authority district, England, 2019

⁹⁹ The affordability ratio was 9.1 in the CSA in 2019, meaning that a CSA resident on a median wage would need just over nine years' worth of income to afford a house.

	Dartford	Gravesham	Thurrock	CSA	England
Affordability ratio % growth since 2010	49%	48%	55%	51%	14%
Median monthly rents	£950	£850	£900	£900	£695
% of gross monthly income ¹⁰⁰	34%	31%	34%	33%	27%

Sources: MHCLG, *Live tables on dwelling stock (including vacants), Table 100 Dwelling stock: Number of Dwellings by Tenure and district: England, 2019*; MHCLG, *Median house price to residence based earnings, 2019*; ONS, *Percentage of renters' median monthly household income spent on median monthly rent, by region, England, FYE 2019*.

7.156 This aligns with consultation feedback from Dartford Borough Council who note that whilst the borough meets its local housing need requirement, much of the new housing is being taken up by people moving out of London and is not affordable to many local residents. In 2019, 72 people migrated from London to Dartford, making Dartford the second most likely place for Londoners to migrate to (after Thurrock).¹⁰¹ The total annual Dartford population change has increased from 400 between 2001-2002 to 2,900 between 2018 and 2019. The components of change are natural change and net migration. In the last 17 years, net migration has increased as a proportion of the total change, from 35% to 73%. Annual net migration has increased by 950% compared to 167% increase in natural change.

Table 7.23 Components of population change (natural change and migration) in Dartford between 2001-02 and 2018-19

	2001 – 2002	2018-2019	Change	
			Unit	%
Total change	400	2,900	2,500	625%
<i>Of which (% total)</i>				
Natural change	300 (65%)	800 (27%)	500	167%
Net migration	200 (35%)	2,100 (73%)	1,900	950%

Source: Kent County Council, 2020, *What is causing Kent's population growth?*

7.157 Furthermore, the Dartford and Ebbsfleet residential needs assessment¹⁰² shows that there has been disproportionately high growth in private renting in Dartford (34% between 2012 and 2017) compared to the South East and England (both 22%). More locally, there is a high dependency on private renting in Swanscombe compared to Dartford and KCC area.¹⁰³

¹⁰⁰ Where 30% is considered affordable

¹⁰¹ ONS, 2020, Internal migration: year ending June 2019 (2018 local authority boundaries) - detailed estimates by origin and destination local authorities, age and sex

¹⁰² Dartford Borough Council, 2019, Dartford and Ebbsfleet Residential Needs Assessment

¹⁰³ Dartford Borough Council, 2018, Swanscombe Area Profile

- 7.158 The Gravesham Strategic Housing Markets Assessment¹⁰⁴ notes that Gravesham sits in a dynamic economic context with strong regional transport connections and inevitable influence from London, all of which influence business location, labour market and housing market. However, despite this, the borough has experienced greater economic challenges than some neighbouring areas. Between 2001 and 2014, the assessment notes that many of the 30-44 age working cohort has moved out of the area for employment reasons, taking many of the 10-14 age groups (their children) with them. This suggests a decrease in the economically active population, coupled with an increase of the 60+ age group. This could affect housing markets by increasing the propensity of under-occupancy occurring among older people with more bedrooms in the home than they require. However, in 2014, there was a positive net migration in these age groups, contributing to a recent reversal of long term trends of negative domestic migration. This could reflect a wider trend of reduced emigration levels since the recession. Main contributors to net in-migration to Gravesham are London boroughs, whereas net migration losses tend to be to other neighbouring Kent authorities. London's increasing affordability pressures are likely to be contributing to this trend of migration from London to Gravesham. On top of this, there are constraints on mortgage finance which are stated likely to remain at least in the short term. This significantly impacts the ability of households to purchase housing.
- 7.159 Similar to Dartford, the South Essex Strategic Housing Market Assessment¹⁰⁵ notes high population growth levels in Thurrock, coinciding with an increased flow from London. Thames Gateway South Essex (TGSE)¹⁰⁶ has a high level of containment, implying that people who work in the area are also likely to live in the area. However, when considering the proportion of migrants whose origin was elsewhere in TGSE, Thurrock shows a lower proportion than the other TGSE, likely reflective of its proximity to London meaning a larger pool of migrants from outside the TGSE. Between 2001 and 2014, Thurrock completed 6,303 dwellings; 5,722 lower than their target and the largest shortfall to target of all TGSE authorities.
- 7.160 The assessment¹⁰⁷ also summarises market signals for TGSE and neighbouring authorities, which include Dartford and Gravesham, where a low rank of 1 (out of a possible 14) indicates that the area has performed poorly in recent years. Overall, Dartford ranks 1 on four of the seven indicators (mean and lower quartile change in rent for 2 beds between 2011 and 2014, overcrowding and concealed families between 2001 and 2011). Dartford only rank above 3 on one indicator (mean change in house prices 2011 – 2014: ranked 11). Gravesham ranks 2 on overcrowding between 2001 and 2011. Thurrock ranks 2 on affordability between 2001 and 2013 and does not rank higher than 7 on any indicator. Overall, this shows that Dartford and Thurrock in particular have come under intense pressure in the last few years.
- 7.161 In terms of housing need, the table below summarises the findings from Appendix 7.3:

¹⁰⁴ Gravesham Borough Council, Strategic Housing Market Assessment, June 2016

¹⁰⁵ South Essex Strategic Housing Market Assessment, May 2016

¹⁰⁶ The authorities of Basildon, Castle Point, Rochford, Southend-on-Sea, and Thurrock

¹⁰⁷ South Essex Strategic Housing Market Assessment, May 2016

Detailed Baseline (document reference 6.2.7.3), with key statistics on homelessness within the CSA showing generally higher rates than England. The CSA has also experienced very high growth in all metrics of homelessness relative to England, although many of these are starting from a low base.

Table 7.24 Summary of key housing need statistics (rough sleepers, accepted as being homeless, temporary accommodation and local authority waiting list) in the CSA and England

Metric (most recent year available)	Dartford		Gravesham		Thurrock		CSA		England	
	Most recent year	Growth since 2010	Most recent year	Growth since 2010	Most recent year	Growth since 2010	Most recent year	Growth since 2010	Most recent year	Growth since 2010
Number of rough sleepers (2018)	12	*	21	2,000	9	350%	42	1,300%	4,677	165%
<i>per 1,000 households</i>	0.27	*	0.49	1,856%	0.14	318%	0.30	1,461%	0.24	151%
Number accepted as being homeless (2017)	148	72%	31	-60%	216	102%	395	46%	56,595	28%
<i>per 1,000 households</i>	3.40	54%	0.73	-62%	3.29	89%	2.60	36%	2.45	21%
Number in temporary accommodation (2017)	109	137%	71	223%	145	245%	325	195%	80,657	67%
<i>per 1,000 households</i>	2.50	113%	1.67	203%	2.21	224%	2.14	174%	3.50	58%
Number of households on local authority waiting list (2019) (% of local authority dwellings)	785 (19%)	218%	1,600 (28%)	-77%	8,300 (84%)	-25%	10,600 (54%)	31%	1.2m (73%)	-34%

Sources: Street counts and estimates of rough sleeping in England, Autumn 2010-2018; Local Authority Homelessness Statistics (England), 2019.

7.162 During pre-application consultation, DBC provided information that 89 residents were accepted as being homeless in 2019/20, down from 102 in 2018/19. Homeless applications have risen significantly over the last ten years but acceptances have fallen, due mainly to increased preventative measures being put in place. As at 18 March 2020 there were 82 households in temporary accommodation (TA). On June 17 2020 there were 136 households in TA, an increase of 54 households. Of these, 41 were in shared accommodation and 18 were in self-contained units. Move on placements are increasingly outside the borough as market rents remain high compared to local housing allowance levels, and combined issues of parental exclusions, domestic abuse and antisocial behaviour making it difficult to secure suitable TA. The last rough sleeper count in November 2019 identified 13 rough sleepers on the streets of Dartford.

Future baseline – the housing market

7.163 Table 7.25 summarises the most recent five year housing supply statements for each CSA borough, comparing the number of deliverable dwellings against the required number of dwellings. Only Dartford appears able to deliver sufficient dwellings to meet its targets; both Gravesham and Thurrock have identified less than 100% of the required dwellings. Thurrock in particular is anticipating difficulty delivering the required amount of housing, with only 35% of the required supply accounted for in the identified deliverable supply of land.

Table 7.25 Summary of five year deliverable dwellings and requirements in the CSA

	Deliverable dwellings	Requirement	% of requirement
Dartford (2019 – 2024)	4,718	4,184	113%
Gravesham (2018 – 2023)	2,585	2,941	88%
Thurrock (2020 – 2025)	2,475	7,040	35%

Sources: Dartford Borough Council Five Year Housing Supply 2019 – 2024; Gravesham Borough Council Five Year Deliverable Housing Land Supply Statement 2018 – 2023; Informed by consultation with Thurrock council.

7.164 The five year housing supply statements specify delivery progress and key growth areas for housing in the CSA local authorities.

Table 7.26 Progress of deliverable sites and location of key delivery areas in the CSA

	Delivery progress	Key delivery areas
Dartford (2019 – 2024)	Of the 4,718 deliverable dwellings, 3,674 dwellings are forecast at sites that have already commenced (76% total forecast).	Dartford town centre / Northern Gateway, the Thames Waterfront, and Ebbsfleet to Stone
Gravesham (2018 – 2023)	Given shortfall of deliverable sites for the current five year period, the Government requires local planning authorities to identify sites from years 6-10 which can be brought forward into the five-year land supply period. Gravesham council is working in partnership with the EDC to bring forward development within the area. Both Dartford and Gravesham Borough Councils have adopted the EDC’s Development Framework for the area, as well as progressing discussions with developers and site owners to expedite delivery of development. To date this has resulted in delivery of Springhead, Ebbsfleet at a greater pace than previously envisaged, as well as an increase in the quantum and pace of development at Northfleet Embankment East.	Of the total 6,170 dwellings required over 2011 – 2028 (plan period), 1,030 are expected at Northfleet Embankment and Swanscombe Peninsula East Opportunity Area.
Thurrock (2020 – 2025)	There were 4,825 dwellings with planning permission on 34 sites as at 1st April 2020. The vast majority of these are on small and medium sized sites that are likely to come forward within 5 years. There is one single permission for 2,850 at the Purfleet Centre that is likely to be developed well beyond five years. It is estimated that 500 of the permitted dwellings at the Purfleet Centre will come forward within 5 years giving an estimated 5 year supply of 2,475.	500 sites at Purfleet Central to be delivered within the next five years. 2,850 homes to be delivered at Purfleet Central beyond five years.

Sources: Dartford Borough Council Five Year Housing Supply 2019 – 2024; Gravesham Borough Council Five Year Deliverable Housing Land Supply Statement 2018 – 2023; Gravesham Local Plan Core Strategy, 2014; Informed by consultation with Thurrock Council.

7.165 The LPAs also consider housing requirements beyond their five year supply. According to Kent and Medway, Dartford is forecast to deliver 18,100 units between 2011 and 2031, and Gravesham is forecast to deliver 7,100 over the same period.¹⁰⁸ This equates to 905 and 335 average per annum for each borough, respectively. This would mean that Dartford might expect to deliver 4,525 units between 2026 (the end of the plan period) to 2031. For Gravesham, they might expect to deliver 1,065 units between 2028 (the end of the plan period) and 2031. Additionally, the EDC Implementation Framework (covering the years to 2037) indicates that five existing development proposals with planning permission will provide land for some 11,000 homes (6,000 in Eastern Quarry and 3,000 in Ebbsfleet Central). The majority of these are in Dartford, but some also appear in Gravesham.¹⁰⁹ The inclusion of these housing projections mean that the future baseline

¹⁰⁸ Kent County Council, Understanding Kent and Medway’s Growth Requirements, 2017

¹⁰⁹ Ebbsfleet Development Corporation, Ebbsfleet Implementation Framework, 2017

is inherently cumulative for housing effects.

7.166 It is expected that some visitors to the London Resort would prefer to choose local accommodation options rather than stay in the Resort's hotels. The London Resort is expected to support some overnight stays both within the CSA as well as further afield than the CSA as a result of linked trips by visitors – for example, a visitor to the London Resort may choose to stay and visit elsewhere in Kent, or in London. However, these effects are not expected to be significant at this wider geography and so are not considered here. This effect therefore focuses on the effect at the CSA level. It is therefore relevant here to consider the current CSA accommodation stock. The table below shows that, across the serviced and non-serviced accommodation sector in the CSA, there are 2,823 rooms. On average, approximately 687 of these will be available year round, but only 361 at peak.

Table 7.27 CSA tourism accommodation room stock and occupancy (in the absence of the London Resort) and estimated available rooms for visitors

		Average		Peak	
		Occupancy	Total available rooms	Occupancy	Total available rooms
Dartford	995	76%	242	87%	127
Gravesham	780	76%	190	87%	100
Thurrock	1,048	76%	255	87%	134
CSA	2,823	76%	687	87%	361

Sources: For Thurrock stock: Visit Britain, *Accommodation Stock Audit, 2016*; For Dartford and Gravesham Stock: Visit Kent *Accommodation Audit, 2019*; Visit Britain, *Room Occupancy, 2019*. Note: this count excludes the 159 rooms at hotels just outside the CSA and the 40 campsite spaces that were included in the construction worker accommodation baseline as described in Appendix 7.8: *Construction Workforce Accommodation Strategy* (document reference 6.2.7.8). Inclusion of these elicits the 3,021 rooms in that baseline.

Future baseline – accommodation stock

7.167 As explained in paragraph 7.165, and Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3), there are a number of hotel and housing future developments which could feasibly contribute to an increase in temporary accommodation options for future visitors. This has been informed by engagement with Visit Kent and Locate in Kent, who agreed that there was a relatively low level of stock.

Sensitivity – the housing market and local accommodation options

7.168 The local accommodation stock is not particularly constrained in percentage terms relative to other areas. However, the CSA has a relatively low absolute level of hotel room stock.

- 7.169 Similarly, whilst CSA vacancy does not appear to be far from that of the England average, both the OOS and PRS demonstrate less affordability relative to England. There has been high growth in the CSA in the number of rough sleepers, number accepted as homeless and number in temporary accommodation since 2010. The number of rough sleepers and number accepted as homeless per 1,000 households is higher in the CSA than England, although the CSA does have lower temporary accommodation per 1,000 households than England. Whilst the number of households on local authority waiting lists as a proportion of local authority dwellings is lower in the CSA than England, there has been significant growth in the waiting list size in Thurrock since 2010 and, consequently, the CSA whereas England has decreased its list size over this time frame. Whilst Dartford has sufficient housing supply in its five year plan, both Gravesham and Thurrock five year supplies fall short of anticipated demand. Furthermore, despite the strong housing delivery in Dartford, the council has highlighted that much of the new housing is not affordable to many local residents. There are issues with affordability across the CSA.
- 7.170 Overall, it is expected that business owners and visitors, as well as existing and future homes and residents within the CSA, have a **high** sensitivity to accommodation effects.

Retail and leisure provision and expenditure

- 7.171 This section considers the baseline and future baseline for two effects: visitor and worker expenditure, and retail and leisure provision. The two are discussed together here due to the strong links between them. The sensitivities are concluded separately at the end. The baseline relevant specifically to theme parks, described in paragraphs 7.141 to 7.152, is not repeated here.
- 7.172 The London Resort is expected to attract a large number of visitors on each day of operation, who might also spend money in local retail centres. The workforce at the London Resort might also spend in the local centres before and after work and in their breaks. The impact of this should be assessed against existing spending (turnover) at retail centres local to the Project Site.
- 7.173 The London Resort is expected to contribute significantly to retail and leisure provision, offering an addition to the CSA tourist attractions, cultural assets, event spaces capable of hosting e-Sports events. The offer at the London Resort will be distinct from the existing and future businesses in the CSA, offering a new leisure destination unlike any which currently exists in the UK. For this reason, it is not expected to directly compete for trade in the same way as standard new provisions of retail and leisure. However, this chapter provides a worst case assessment in which the retail and leisure space provided is assumed to compete with local centres. The assessment is undertaken in this way in order to provide a view of the worst case potential impact, acknowledging that the proposal is unique and therefore no standard methodology for assessing its impact exists.
- 7.174 The London Resort is also expected to support spending on retail and leisure further afield than the CSA as a result of linked trips by visitors – for example, a visitor to the London Resort may choose to stay and visit elsewhere in Kent, spending on retail, leisure and

F&B. However, these effects are not expected to be significant at this wider geography and so are not considered here.¹¹⁰

Baseline

Offering

7.175 Appendix 7.9: *Retail and Leisure Impact Assessment* (document reference 6.2.7.9) provides an overview of the existing retail and leisure offering in the CSA. Detailed information is also contained in Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3).

7.176 Key centres identified by the local councils and baseline analysis are as follows:

- Bluewater Shopping Centre (Dartford): a regional shopping centre with a high density of comparison goods floorspace and F&B provision;
- Dartford town centre (Dartford): a local district centre providing comparison and F&B offers but at a lower density than Bluewater. There is also some convenience goods floorspace;
- Gravesend town centre (Gravesend): a local district centre providing comparison and F&B floorspace again at a lower density than Bluewater. There is also some convenience goods floorspace;
- Lakeside Shopping Centre (Thurrock): a regional shopping centre with a high density of comparison and F&B floorspace;
- Lakeside Retail Park (Thurrock): part of the regional centre offering mainly comparison retail;
- Grays (Thurrock): the administrative and cultural centre of the borough and comprises of a more traditional town centre. The retail offer in Grays includes a mix of day-to-day convenience provision and some comparison floorspace.

7.177 The main cinema in Dartford is in Bluewater with 17 screens and a capacity of 2,879. The Orchard Theatre in Dartford town centre recently underwent a refurbishment to increase capacity by 69 to 1,025 and attracted 250,000 visitors in the 12 months to June 2019.¹¹¹ In Gravesend, the Woodville Halls Theatre (Gravesend) offers an 810 seat auditorium which acts as a space for theatre, concerts, banquets, weddings and trade shows. Underneath the main auditorium is another studio space seating up to 150 and the Blake

¹¹⁰ Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) considers the retail and leisure baseline across wider geographies and Appendix 7.9: *Retail and Leisure Impact Assessment* (document reference 6.2.7.9) considers the wider effects.

¹¹¹ Gravesend Reporter, June 2020, The Orchard Theatre to undergo massive refurbishment. Received from <https://www.gravesendreporter.co.uk/news/major-update-for-the-orchard-dartford-1-6117130>. Accessed November 2020.

Gallery offering exhibition space. The Woodville also holds the Paul Greengrass cinema, offering one screen. In Thurrock, there are two operational cinemas: the West Thurrock Warner Multiplex which has seven screens and the West Thurrock UCI Multiplex which has 10 screens. Both have capacity of over 2,000. The Thameside Theatre (c. 320 seats) is part of the Thameside Complex; a multi-purpose arts venue that also includes Thurrock Museum, Grays Library and an exhibition area. There are also a small number of music venues spread across the CSA.

7.178 The London Resort would expand the existing leisure market into new sectors through offering different options, such as immersive experiences and productions and e-Sports. These markets are significant and growing – indeed global e-Sports was estimated to generate \$1.1bn in 2019, with year on year growth of 26.7% and a global audience of 452.8m.¹¹² The audience is broadly split into e-Sports enthusiasts (accounting for just under a half since 2017) and occasional viewers. Asia Pacific accounted for 57% of e-Sports enthusiasts in 2019, with the EU accounting for 16% and America accounting for 15%.¹¹³ Whilst e-Sports can be played or watched anywhere on any platform, the tournaments are almost always physical events with a live audience and referees. Whilst the CSA and even the UK might contain a number of e-Sports spectators, there are limited options for these types of leisure experiences in the CSA and the UK, particularly at the scale proposed by the London Resort.

Employment

7.179 Retail turnover ultimately supports retail jobs, so a comparison of retail employment in the CSA can give an indication of the importance of retail in different areas. Both Dartford and Thurrock have a far higher proportion of their workforce employed in retail (16% and 17% respectively) than Gravesham (10%) and GB (9%). Employment in the sector as a proportion of total employment has fallen in all geographies since 2009.

Table 7.28 CSA workplace based employment in retail and proportion of total employment in 2009 and 2018

	2009		2018	
	Employment	% of total employment	Employment	% of total employment
Dartford	11,000	22%	9,000	16%
Gravesham	3,500	12%	3,500	10%
Thurrock	12,000	20%	11,500	17%
CSA	26,500	19%	24,500	15%
GB	2.9m	10%	2.9m	9%

Source: ONS, Business Register and Employment Survey, 2009, 2018

¹¹² Newzoo (2019), Free 2018 Global Esports Market Report.

¹¹³ Newzoo (2019), 2019 Global Esports Market Report.

7.180 Appendix 7.9: *Retail and Leisure Impact Assessment* (document reference 6.2.7.9) also discusses the health of the high street. It finds that, whilst some centres such as Bluewater are performing well, there is a general decline felt amongst more local town centres. The centres are heavily retail focused which has meant that the rise in online shopping has disproportionately disadvantaged the high street's viability. It is anticipated that a diversification of uses would help to revitalise them. On top of this, COVID-19 and the lockdown restrictions have inhibited trade. This, for many stores, has accelerated the general decline.

Future baseline

Turnover

7.181 Turnover in the CSA provides the baseline against which to assess any additional expenditure by visitors or workers at the London Resort and assess any trade diversion. Table 7.29 presents turnover estimates for key assessment years. These are split by sector based on the types of spend that are to be affected by the London Resort. Appendix 7.9: *Retail and Leisure Impact Assessment* (document reference 6.2.7.9) provides more detail on the estimates.

Table 7.29 Future turnover estimates in the CSA (£m)

		2025	2030	2038
Comparison	Dartford	£1,440m	£1,721m	£2,288m
	Gravesham	£352m	£431m	£594m
	Thurrock	£2,447m	£2,977m	£4,060m
	CSA	£4,239m	£5,129m	£6,943m
Convenience	Dartford	£118m	£132m	£141m
	Gravesham	£324m	£357m	£379m
	Thurrock	£564m	£586m	£632m
	CSA	£1,007m	£1,075m	£1,152m
Restaurants and café meals	Dartford	£160m	£177m	£216m
	Gravesham	£79m	£85m	£96m
	Thurrock	£251m	£279m	£329m
	CSA	£489m	£541m	£641m
Alcoholic drinks outside home	Dartford	£19m	£22m	£26m
	Gravesham	£12m	£13m	£15m
	Thurrock	£24m	£27m	£32m
	CSA	£56m	£63m	£73m
Cinemas and theatres	Dartford	£21m	£24m	£29m
	Gravesham	£4m	£4m	£5m
	Thurrock	£23m	£26m	£30m
	CSA	£49m	£55m	£64m
Night clubs/music venues/disco/bingo	Dartford	£30m	£34m	£40m
	Gravesham	£11m	£12m	£13m

		2025	2030	2038
	Thurrock	£37m	£41m	£48m
	CSA	£77m	£86m	£102m

Sources: *Bluewater Shopping Centre Proposed Extension (REF: 16/01207/OUT) Retail Planning Impact Appraisal (RPIA), 2017; North Kent SHENA Retail & Commercial Leisure Assessment, 2016; South Essex Retail Study, 2017; Volterra calculations*

7.182 Considering e-Sports specifically, games market analyst *Newzoo* estimates that the global e-Sports market will generate \$1.8bn in 2022. The global audience has grown from 335m in 2017 to a projected 645m in 2022.

Cumulative schemes

7.183 Retail and leisure provision and future schemes provide the baseline against which to assess the contribution of the London Resort to retail and leisure within the CSA.

7.184 Of the cumulative schemes, seven have been identified that may impact future demand and provision of retail and leisure uses in the CSA. These include Land to the west of Bluewater Parkway in Greenhithe, Chadfields in Tilbury, Aveley Lakes in Aveley, Land east of Caspian Way in Swanscombe, Langdon Hills Golf and Country Club in Upminster, Land at Former Northfleet Cement Works, and Northfleet Embankment East. The schemes listed above have proposals to provide a variety of retail/leisure uses including adventure centres, sports stadiums/facilities, entertainment facilities (cinema, museum, gallery) and restaurants/café's and bars. There is limited quantitative information on the amount of floorspace or visitors that may be generated by these proposals, however more detail of these schemes can be found in Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3).

7.185 The Ebbsfleet Implementation Framework states that, for the six existing development proposals with consent, there is maximum consent for 28,000 sqm retail space delivered across five of the six proposals (mostly at Eastern Quarry) and maximum consent for 24,000 sqm of leisure floorspace at Eastern Quarry. Furthermore, there is 147,000 sqm across an (undefined) split of retail, hotels and leisure in Ebbsfleet Central.¹¹⁴ Most of these plans are relevant to the Dartford side of the EDC area.

7.186 Regeneration is planned for both Dartford and Gravesend town centres. Dartford town centre regeneration will include a new cinema, retail, restaurants and bars. Gravesend town centre regeneration will include a new cinema/theatre. Gravesham notes the importance of the Heritage Quarter planning application in bringing forward leisure provision to meet the future demand and increasing the attractiveness of the town centre. Thurrock notes the success of Lakeside Shopping Centre as central to its strong future leisure offering.

¹¹⁴ Ebbsfleet Development Corporation, Ebbsfleet Implementation Framework, 2017

COVID-19

- 7.187 Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) and Appendix 7.9: *Retail and Leisure Impact Assessment* (document reference 6.2.7.9) provide more detailed discussions on the impact of COVID-19 on spending, retail and leisure.
- 7.188 Overall, the discussion finds that the high street has been disproportionately affected by the restrictions. Whilst many forecasts estimate recovery for the general economy by 2024, it is possible that the high street will still be feeling effects after this point. Spending on the high street has been inhibited, having a knock-on effect for retail and leisure provision. The general decline of the town centres that was seen in the years leading up to the crisis has only worsened by the restrictions on any visits at all. If the effects of COVID-19 persist longer than the forecasts expect such that they affect the future assessment years for the London Resort, then future baseline spending and retail and leisure provision could fall, increasing the sensitivity of the receptor.

Sensitivity

- 7.189 The retail and leisure offering in the CSA is a sensitive issue that was raised during consultation. The declining state of the high streets and the threat of COVID-19 on their survival places a great number of businesses and jobs at risk. There are also pockets of concern in certain subsectors (cinemas) and locations (Gravesend). This is in an area where a high proportion of employment is dependent on the sector. Spending is due to increase in the future, which will require provision to meet the demand.
- 7.190 Given these issues, the sensitivity of businesses to expenditure effects is **high**.
- 7.191 The sensitivity of businesses to retail and leisure provision effects is **high**.

Healthcare

- 7.192 During the operational phase of the London Resort, workers and visitors may place additional demand on local healthcare services. To estimate the impact of this, existing provision should be considered.

Baseline

- 7.193 The baseline healthcare provision is the same as set out in the context of construction effects (paragraphs 7.70-7.78). During the pre-application consultation, EDC and Thurrock Council raised concerns about access to GPs.
- 7.194 The Applicant has consulted with the emergency services in the area. NHS England noted that the nearest hospitals are not large, so care should be taken to avoid straining local providers. This position was reinforced by consultation with the Kent and Medway CCG which noted that Darent Valley Hospital has minimal potential for expansion, and that efforts should be focussed on avoiding any unnecessary A&E visits.

Future baseline

- 7.195 Paragraph 7.74 discusses future primary healthcare provision in the area but notes the uncertainty over the timing and delivery of such additional provision.
- 7.196 As shown in Table 7.16, there is expected to be strong population growth in the CSA in all assessment years (+15% by 2038). Population growth is the largest driver of increasing demand for health services. As this population growth is anticipated within policy it is reasonable to assume that the resulting growth in health requirements will be planned for by the health service providers. This was reinforced by consultation with the Kent and Medway CCG.
- 7.197 During pre-application consultation, EDC noted that there are plans for a Health and Wellbeing Hub, which will be contained within the Health, Education and Innovation Quarter, just south of Ebbsfleet International station. The business case for the Hub is yet to be presented and so feasibility is still to be determined. The Hub services will be dedicated to both the social determinants of health (social care, mental health etc) as well as clinical services (GPs) too. If delivered, this is anticipated to be operational by 2025. The EDC is in discussions with the CCG to ensure that the Hub is designed to cater for the right number of the EGC's new residents (as some will be catered for by planned expansion to healthcare facilities in the wider area). The scale of the Hub is currently under consideration, with the scale of the scheme being determined by future need locally. However, the Hub is intended to provide sufficient additional services so as to cater for a considerable growth in the local residential population. The other main health infrastructure development is the provision of an Urgent Treatment Centre at Gravesham Hospital, due to open in December 2020. This replaces some of the functions of a previous walk-in centre that has been closed down but will contain some additional capacity. Developments will be also expected to mitigate their effect through provision of on-site capacity and/or financial commitments.
- 7.198 The potential impact of COVID-19 on the future baseline is discussed in paragraph 7.77 and in Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3). Overall, the worst case scenario is that future demand for healthcare will increase as a result of the pandemic.

Sensitivity

- 7.199 The current baseline identifies that GPs in the CIA are operating well above the benchmark, in terms of patient list size. Whilst the construction future baseline identified that new provision is intended to be provided in order to serve new residents as a result of the substantial residential growth planned in the area, and this is increasingly likely to be the case in future years once the development is operational, there are no definitive plans in terms of timescales, numbers of GPs, or detailed forecasts available. The same is true for A&E provision at Darent Valley Hospital and other healthcare provision (including mental health). Overall, the current and future healthcare provision is judged to have a **high** sensitivity.

Public services

7.200 The London Resort does not contain an open market residential element, which would accommodate school-aged residents. Due to the impact of the workforce on the local housing market and the likely links with local schools and colleges, the education baseline is considered below. The operational phase of the London Resort is expected to support a number of additional visitors and workers in the area, all of which may place additional strain on emergency services (police stations, ambulance stations and fire stations).

Baseline

7.201 Paragraph 7.128 presents baseline information relating to early years and schools.

7.202 In terms of ambulance services, the nearest ambulance service to the Kent Project Site is the SECamb Station in Dartford, whereas the Essex Project Site is served by four ambulance services, the closest being the Euromed Ambulance Service, to the north of Tilbury. In terms of police services, the closest police station to the Kent Project Site is North Kent Police Station, between Ebbsfleet and Gravesend. Within the CIA, Tilbury Police Station is located on the north side of the river. There are two fire stations in the vicinity of the Kent Project Site – one lies within the CIA, whilst the other is located outside the CIA towards the lower western area of the Project Site. There is also a fire station north west of Tilbury.¹¹⁵

7.203 The Applicant has consulted with the emergency services in the area. The NHS noted that it is vital to understand the medical facilities on site and ensure priority access for all first responders.

7.204 KCC Director of Public Health stated their interest in involvement in the on-going development process, which has been noted by the project team. Kent Fire and Rescue Services noted that they are keen to ensure special access and emergency access for the existing infrastructure including HS1.

Future baseline – public services

7.205 As previously demonstrated, there is expected to be strong population growth in the CSA in all assessment years. This growth will increase demand for public services, but it is assumed that much of this growth will be planned for by public service providers and local planning authorities. Developments will also be expected to mitigate their effect through provision of public services and/or financial commitments.

7.206 Paragraph 7.132 explains how local education provision is likely to change in the future baseline.

7.207 Of the cumulative schemes, the following seven developments are expected to have an

¹¹⁵ Addressbase Premium, Google Maps

effect on the future provision of a variety of public services, including health services, educational facilities, and recreational/community facilities: Eastern Quarry, The Pier in Greenhithe, Land West of Springhead Road in Swanscombe, Northfleet Embankment, Land at Coldharbour Road in Northfleet, Chadfields in Tilbury, and Land at Former Northfleet Cement Works. Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) contains more detail on the types of facilities provided by each scheme.

Sensitivity

7.208 The sensitivity of public services is dependent on the capacity of those public services to respond to changes in the population, and whether increases or decreases in the population would have the potential to impede those services ability to continue delivering at a high quality for members of the public. Consultations with emergency services in the area have highlighted the requirement for collaboration between themselves and the London Resort in order to effectively manage any increased demand.

7.209 As most public services are funded either centrally, through local taxation or through charges at the point of services, these services should generally be able to respond to changes in their population catchment. It needs to be considered that changes to the funding of public services can often be slow to react, however, and can be affected by external factors (besides from population) such as political decisions. On this basis, residents are expected to be of **medium** sensitivity to changes in public services in the CIA.

Summary of receptor sensitivities

7.210 Table 7.30 summarises the justification upon which receptor sensitivities have been assigned. The sensitivity is the ability of a given geographical area, community, resource or receptor to deal with or respond to change. This sensitivity is derived from an analysis of baseline socio-economic conditions and, where possible, future baseline conditions. Whilst the receptors considered have been identified as the relevant ones which might be impacted by the London Resort, their sensitivity judged here represents the judgment of their baseline conditions and ability to respond to change, not any assessment of the effect that the London Resort may have upon them (this is included later on in the assessment of effects).

Table 7.30 Summary of receptor sensitivities

Effect	Receptor(s)	Sensitivity (spatial level)
Construction Effects		
Potential temporary effect of employment generation and effects on businesses in the supply chain	Residents; Businesses	Medium (LCA) Large available construction labour, high number of businesses and anticipated future workforce growth, but uncertainty about future requirements for construction workforce in the area Low (National)

Effect	Receptor(s)	Sensitivity (spatial level)
		Large available construction workforce and anticipated future workforce growth
Potential temporary effect of employment on the labour market, skills and training	Residents; Employment, skills and training providers	High (CSA) Low qualifications in the CSA relative to national average, evidence of a skills gap and high reliance of construction industry upon apprenticeships
Potential temporary effect of the construction workforce on crime levels	Residents; Businesses	High (CSA) High, persistent and rising rates of crime
Potential temporary effect of the construction workforce on local healthcare	Residents	High (CIA) Patient to GP ratio high and significantly above the recommended benchmark with no definitive plans for the timescales of future provision for either GP or A&E provision.
Potential temporary effect of employment generation on the accommodation market (including private rented and short-term accommodation)	Homes; Residents	Medium (CSA) Local market of available and affordable bed spaces is not constrained, but quantum is low and is highly reliant upon one segment – PRS stock
Potential temporary or permanent displacement / loss of businesses and other services	Residents; Businesses	High (PSB) Ongoing dialogue with the businesses to be displaced will inform the sensitivities of the businesses on an individual level. In the absence of this information, the sensitivity of the businesses (and their workers) within the PSB at risk of displacement is conservatively deemed high. Medium (CSA) At the CSA level, the sensitivity of businesses and residents who use them is deemed medium.
Potential temporary or permanent displacement / loss of community uses, such as open spaces, public rights of way and other recreational or community facilities	Community uses (and their users) including: - Community facilities - PRoWs and routes - Open spaces	Low (PSB) (Community facilities) One community facility onsite and alternatives are available. Low and medium (PSB & CIA) (PRoWs and routes) An individual assessment of the sensitivity of PRoWs and routes and their users has been undertaken with sensitivity ranging between low and medium depending on the route and its use Low and medium (PSB) (Open spaces) An individual assessment of the sensitivity of onsite open spaces (the playing field and marshes) has been undertaken informed by quality of space, access and use.
Displacement of residential dwellings as a result of property acquisition	Homes; Residents	High (Dartford) Despite strong housing supply pipeline to 2022, partly due to strong population growth, house prices remain unaffordable for many residents and homelessness is increasing.

Effect	Receptor(s)	Sensitivity (spatial level)
Potential temporary or permanent disruption to housing delivery as a result of the land take and construction works	Homes; Residents	High (Dartford) Despite strong housing supply pipeline to 2022, partly due to strong population growth, house prices remain unaffordable for many residents and homelessness is increasing.
Operational effects		
Potential effects associated with net additional employment (including indirect and induced effects, and characteristics of jobs generated by the project)	Residents; Businesses	Medium (CSA) Low (LCA, national) High levels of out commuting in CSA. However, employment in the CSA, LCA and national has been increasing over time and is forecast to increase further to 2038.
Potential effects of new employment on skills and training	Residents; Employment, skills and training providers	Medium (CSA residents – local employment effects) The CSA residents appear mostly on par with the national average in terms of economic activity, unemployment and claimants. High (CSA residents and skills providers – skills effects) Relatively low qualifications relative to national levels and a lack of vocational opportunities.
Potential effects of trade creation and diversion relating to theme parks	Businesses	High (national) The UK currently does not have a global calibre theme park. Population and tourism data suggests that it could support 2 to 3 global theme parks. Medium (RCA) Across the UK there are several theme parks which have been growing over time and have future investment plans.
Potential effects of visitors and workers on local accommodation options and the housing market	Homes; Residents; Businesses; Visitors	High (CSA) Low affordability and high levels of homelessness relative to national levels. Absolute level of hotel room availability low.
Potential effects of visitor and worker expenditure	Businesses	High (CSA) Declining high streets, with particular areas and sectors performing very poorly. COVID-19 having significant impact.
Potential effect of workers and visitors on healthcare provision	Residents	High (CIA) Patient to GP ratio high and significantly above the recommended benchmark and residential growth planned in area.
Potential effect of workers and visitors on other public services	Residents	Medium (CIA) High population growth planned in the area but public services are generally able to respond to changes in local demand.
Potential effect on local retail and leisure, including town centres	Businesses	High (CSA) Sensitivity is varied, with some centres and subsectors performing well, evidenced by low

Effect	Receptor(s)	Sensitivity (spatial level)
		vacancy rates and growth plans. However this is an identified sensitive issue by local stakeholders and pockets of poorer performance have been identified both spatially and sectorally across the CSA. Parts of the retail sector have also been one of the most severely hit by COVID-19 and whilst generally recovery is expected, high street and town centre retail has been in decline for some time and so there is a risk that adverse impacts persist. The sensitivity is therefore conservatively assumed to be high.

POTENTIAL SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSALS - CONSTRUCTION

7.211 As noted earlier, this section presents an assessment of all socio-economic effects of the London Resort during construction, with a focus on significant effects. Insignificant effects are summarised below, and the detailed assessment is provided in Appendix 7.4: *Non Significant Effects* (document reference 6.2.7.4).

Potential temporary effect of employment generation and effects on businesses in the supply chain

7.212 The construction of the London Resort will support construction employment on-site and off-site throughout the supply chain in all phases of construction. The construction will require specialist and highly skilled contractors and is expected to utilise considerable offsite construction. Detailed information supporting this effect can be found in Appendix 7.4: *Non Significant Effects* (document reference 6.2.7.4).

7.213 The construction of London Resort is expected to generate 23,300 job years¹¹⁶. Gate One is expected to generate 16,500 job years with 6,600-9,900 expected on-site and 6,600-9,900 off-site.¹¹⁷ This equates to an average construction workforce on-site each year of 2,600-4,000. At peak (2023), there are expected to be 3,300-5,000 workers on-site. Gate Two is expected to generate 6,800 job years with 2,700-4,100 expected on-site and 2,700-4,100 off-site. This equates to an average on-site each year of 900-1,400. At peak (2028), there are expected to be 1,100-1,700 workers on-site.

7.214 Between 50% and 75% of the on-site workers are anticipated to be home-based; the remaining 25% to 50% are expected to be non-home-based and would require some form of temporary accommodation. The effect of these workers on the accommodation market is considered later in this chapter. It is anticipated that the home-based workers

¹¹⁶ One job year is defined as full time employment for one person for one year

¹¹⁷ Where the range is derived from uncertainties surrounding the proportion of the workforce that will be on-site and off-site.

will commute from across the LCA, including many from Kent, Essex and Greater London.

- 7.215 The assessment considers whether this increase in employment could put additional pressure on the labour market which could increase construction and supply chain costs, which might be regarded as an adverse economic effect. Whilst this is a possibility, the labour market is large and statistics on the availability, mobility and turnover of construction workers tend to indicate that there is some capacity within the labour market to meet local demand for construction workers. The nature of the construction industry is that workers move between projects regularly. The LCA also has a large available construction workforce. Despite there being significant construction planned and contained within the cumulative schemes, the future baseline quantified the scale of construction workforce required for the cumulative schemes, showing that they (at the relevant 2023 peak year) would equate to just 1.7% of LCA's construction workforce. This was factored into the assessment of the sensitivity of the future baseline construction workforce.
- 7.216 In the peak year (2023) the London Resort will require an estimated peak onsite home-based workforce of 2,500-3,750, commuting from across the LCA. Whilst this is a substantial quantum for one scheme, the scheme is located in an area accessible to a large construction workforce. This equates to just 0.7% of the LCA's construction workforce. Overall, due to the reasons described above about the size of the construction workforce and the evidence on availability, mobility and turnover of construction workers, the provision of job opportunities is expected to be a net benefit for residents of the LCA. The magnitude of the impact is low. The effect of the 2023 peak home-based workers on LCA residents who work in construction is therefore found to be a **minor beneficial** effect (**not significant**).
- 7.217 The effect of the 2023 peak workforce on national businesses is found to be **negligible (not significant)**. Appendix 7.4: *Non Significant Effects* (document reference 6.2.7.4) contains the detailed assessment.

Potential temporary effect of employment on the labour market, skills and training

- 7.218 The construction of the London Resort will support local jobs and provide opportunities for skills and training. The breakdown has been estimated based on the occupational breakdown of workplace-based construction employment in Kent and Thurrock, which is the smallest workplace geography for which reliable data are available.
- 7.219 Based on this, it is estimated that 70% of the construction workers will be employed in high skilled occupations (defined as managers, directors and senior officials, professional occupations, associate professional and tech occupations and skilled trades occupations). It is estimated that Gate One will support between 2,330 and 3,250 high skilled construction jobs at the peak (2023) and between 780 and 1,200 high skilled roles will be supported at the Gate Two peak (2028). The breakdown by occupation is shown in the

table below.¹¹⁸

Table 7.31 Indicative skills profile of construction workforce in 2023 and 2028 peak years

	Proportion	Gate One (2023 peak)		Gate Two (2028 peak)	
		Low	High	Low	High
Managers, directors and senior officials	17%	560	840	190	290
Professional occupations	8%	260	400	90	140
Associate prof & tech occupations	10%	340	510	110	170
Skilled trades occupations	35%	1,170	1,770	390	600
<i>Total high skilled</i>	<i>70%</i>	<i>2,330</i>	<i>3,520</i>	<i>780</i>	<i>1,200</i>
Administrative and secretarial occupations	8%	260	390	90	130
Caring, leisure and other service occupations	<1%	-	-	-	-
Sales and customer service occupations	<1%	-	-	-	-
Process, plant and machine operatives	10%	330	510	110	170
Elementary occupations	9%	310	470	100	160
Total	100%	3,300	5,000	1,100	1,700

Sources: ONS, 2018, Annual Population Survey – workplace analysis; Volterra calculations

- 7.220 The construction skills supported may be long term in that skills development persists long after construction is complete. This is important given the level of other development in the area, such as the Lower Thames Crossing and development at Ebbsfleet Garden City (among others), there is an opportunity to enable long term job opportunities. This will also reduce the level of out commuting in the area which is important given the identified issues with high levels of out commuting in the CSA.
- 7.221 Overall, the magnitude of the impact in 2023 (peak construction year for Gate One) and 2028 (peak construction year for Gate Two) is expected to be medium (high sensitivity receptor). This results in a temporary effect which is **major beneficial** at the CSA level (**significant**) in both 2023 and 2028.
- 7.222 The Applicant’s emerging employment and skills initiatives are described in more detail in Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7).

Potential temporary effect of the construction workforce on crime levels

- 7.223 The construction of the London Resort will require a number of construction workers to be present at the Project Site over the construction period. The employment of construction workers will give rise to beneficial employment effects however their

¹¹⁸ UK Commission for Employment and Skills, 2012, Developing Occupational Skills Profiles for the UK: A Feasibility Study. Table B1 of this study allocates skill levels ranked 1 to 4 to SOC2010 classifications. Those ranked 3 and 4 have been classified as high skilled by this report.

presence might give rise to some negative effects for existing community residents and businesses in the absence of mitigation and safeguards.

- 7.224 As a worst case, the increase in workers, many from outside the local area, could increase the level (or perception) of anti-social behaviour and other forms of crime in the area. It has the potential to adversely affect the perceived safety of local neighbourhoods during the construction phase. This could harm the trade of local businesses. During pre-application consultation, Thurrock Council reported a perception of a rise in crime as a result of construction workforces.
- 7.225 Existing literature^{140, 141, 142, 143} identifies that certain groups may be more susceptible to the impacts of crime than others; for example, older people (aged 65 and over) may also be more reluctant to travel around/past the Project Site when there is a greater presence of construction workers.¹¹⁹ Also, individuals living with a long-term health condition or disability are more susceptible to social isolation due to being cut off from society, with the inflow of the construction workforce having the potential to magnify this effect.¹²⁰ TfL (2019) highlights that women are more likely to be targeted by opportunistic crime.¹²¹ Finally, research by CITB showed that 85% of workers on construction sites heard offensive or inappropriate language directed towards LGBTQ workers – compared to 60% in normal working environments.¹²²
- 7.226 The future workforce is expected to account for a 0.9% increase in the 2023 CSA population (409,000). In the context of the CSA, this small addition is not expected to have a material increase in crime rates. On top of this, many of the workers will be staying in on-site accommodation (discussed below) which will provide amenity facilities, reducing the need for workers to utilise community facilities and, consequently, reducing the likelihood of crime. Finally, the enclosed nature of the site and the fact that 80% of the workers will be coming by river will help to mitigate the negative impacts.
- 7.227 Overall, there is expected to be some additional crime in the CSA as a result of the temporary workforce. In the context of the future CSA population, the magnitude of the impact in 2023 (peak construction year for Gate One) and 2028 (peak construction year for Gate Two) is expected to be low (high sensitivity receptor) for both residents and businesses. This results in a **moderate adverse** effect at the CSA level (**significant**), pre-mitigation.
- 7.228 The construction period will be managed in accordance with the highest standards to minimise any adverse impacts, including crime. Details of these measures are summarised in the additional mitigation section.

Potential temporary effect of the construction workforce on local healthcare

- 7.229 The construction workers could require healthcare from services near the Project Site,

¹¹⁹ Health and Safety Executive (2019): Preventing Workplace Harassment and Violence

¹²⁰ Jo Cox Commission on Loneliness (2017): 'Combatting Loneliness One Conversation at a Time'

¹²¹ TfL (2019): Travel in London: Understanding Our Diverse Communities 2019

¹²² Construction News (2014): Sexist, Racist and Homophobic Language Common in the Construction Industry

potentially increasing demand and putting pressure on the supply. It is also possible that the construction of the London Resort would have an impact on wider health and social care services, including mental health and acute services. Whilst these latter effects have not been quantifiably assessed in this chapter due to data unavailability, these are considered qualitatively in concluding the assessment of this effect.

- 7.230 The baseline found that local GP provision in the CIA was constrained. Whilst construction workers could – if permitted by the practice – register with a local GP, few are expected to do so because they are temporary.
- 7.231 On average, construction workers have a higher injury rate at work compared to the average worker (2.4% of the workforce per year compared to 1.7% across all industries). This means that, at peak, 135 injuries might arise during construction in 2023 and an estimated 46 injuries in 2028. In the context of the existing baseline, the number of injuries associated with the construction period is very small.
- 7.232 The Project Site would be managed in line with best practice and all efforts would be made to reduce the risks of accidents. There will be an on-site medical facility for accidents and sickness, appropriately resourced with fully qualified personnel. The facility will be open for all working hours, with any requirement outside these hours covered by the NHS. The facility will enable first aid to be rendered to workers if they are injured or become ill at work. In addition to the treatment of minor injuries and ailments, the facility would provide preventative healthcare. In the event of any major incidences, the on-site medical team will provide first aid and the local emergency services will be called to take any seriously injured workers to hospital.
- 7.233 The facility will be constructed in time to ensure that services are in place before the workforce arrives. If required, temporary arrangements would be put in place for any number of workers that would be present before the construction of the facility. The facility will be clearly signposted throughout the site and will be easily accessible.
- 7.234 Through consultation with the Kent and Medway CCG, the importance of collaborative planning was highlighted. For example, directing temporary onsite construction workers to use online GP services would enable them to access any needs for regular prescriptions, as well as reducing potential impacts upon local services. Similarly, working collaboratively with the CCG to assess what the onsite facility should include. The Applicant is committed to ongoing engagement with the CCG and collaborative planning.
- 7.235 Everyone working on-site would go through a health and safety induction process before they are allowed to commence work on the site. This induction training will concentrate on health and safety factors specific to the site and will be given by appropriate personnel nominated by the employer.¹²³ A programme of health and safety training throughout the project will be implemented. There is also a requirement for a proportion of the workforce to have a first aid qualification.

¹²³ Construction Industry Joint Council, 2018, Working Rule Agreement for the Construction Industry

7.236 The magnitude of the impact in 2023 (peak construction year) is expected to be negligible (high sensitivity receptor). This results a **minor adverse** effect at the CIA level (**not significant**). Appendix 7.4: *Non Significant Effects* (document reference 6.2.7.4) presents a detailed assessment of this effect.

Potential temporary effect of employment generation on the accommodation market (including private rented and short-term accommodation)

- 7.237 The baseline of existing accommodation stock shows that the market is constrained. There is expected to be a peak non-home based workforce of up to 2,500 in 2023 and 850 in 2028, which would place pressure on a constrained housing market. There is also expected to be 630 non-home based workers in 2023 and 210 in 2028 in the study area due to construction of nearby future developments.
- 7.238 The Applicant is to provide on-site capacity for non-home-based workers, consisting of 1,000 to 2,000 rooms on a decommissioned cruise ship and 500-700 mobile homes on the Gate Two site during the construction of Gate One. During the construction of Gate Two, the cruise ship will remain and mobile homes will be located in Tilbury. In the absence of this embedded mitigation, the effect would likely be major adverse. However, the Applicant's embedded mitigation measures will be sufficient to fully mitigate the negative effects generated by both peak workforces on the local accommodation market. Despite the on-site accommodation being sufficient for the workers, the Applicant recognises that a small number still may choose to utilise the existing accommodation market.
- 7.239 Overall, the impact in 2023 and 2028 is expected to be of low magnitude (on a medium sensitivity receptor). This results in a temporary effect which is **minor adverse** at the CSA level (**not significant**). Appendix 7.4: *Non Significant Effects* (document reference 6.2.7.4) and Appendix 7.8: *Construction Workforce Accommodation Strategy* (document reference 6.2.7.8) present more information on the effect of the non-home based workforce on the accommodation market.

Potential temporary or permanent displacement / loss of businesses and other services

- 7.240 The London Resort will result in the temporary or permanent displacement of some businesses or other services. A worst-case assessment (with regards the loss of business operations and associated employment) is applied in this assessment, where it is assumed that the businesses and services are displaced in the first year of the construction phase (2022), although it is noted that the impact will reduce in the years following the displacement.
- 7.241 This effect is assessed at both the PSB and CSA level. At the PSB level, the receptors are the displaced businesses and their workers. At the CSA level, the receptors are businesses and residents across this wider study area. This includes both competitor and supply chain businesses across the CSA and residents who use the services provided.
- 7.242 The baseline shows that an estimated 69,100 sq.m of commercial floorspace (28% of

which is estimated to be vacant) is currently on site and could be lost as a result of the London Resort. An estimated 1,040 FTEs (1,160 jobs) are currently supported within the PSB (the majority of which are supported on the Kent Project Site, as described earlier).³⁹

- 7.243 The impact is determined partly by whether the businesses can relocate and whether they do so within the CSA as opposed to relocating outside the CSA or being lost altogether (and appropriately compensated). For example, some industrial firms might have strict requirements for land use which are not available in the CSA, hence they cannot relocate within it. This would affect the residents who use the business as well as they would have further to travel to access the service. Another influence over impact is the speed at which the business can relocate as this could influence the extent of lost trading. For example, those businesses requiring licences to operate might require more time to reapply and relocate. The type of business might also influence the impact; for example, an office-based business might do most of its work online, so moving may have limited impact on their outputs. These factors will affect both firms and residents.
- 7.244 One of the biggest adverse factors in business relocations is uncertainty over premises and the timing of any enforced relocation. For some businesses, being able to realise financial compensation and begin their search for alternative premises sooner rather than later and with financial certainty may be a more beneficial outcome – this is underpinned by the ‘Option Agreement’ offered to businesses by the Applicant in 2020.
- 7.245 The mitigation section at the end of this chapter discusses the mitigation put in place for this effect.

PSB

- 7.246 At the PSB level, the impact in 2022 (the worst case – the earliest date for displacement) will initially be severe for the businesses and their workers. If the businesses relocate within the same year and operations are not interrupted to a very large extent, then the overall impact will be reduced. A high proportion (94%) of firms are small businesses, which are typically more easily accommodated for relocation but might require more assistance to find alternative premises.
- 7.247 Pre-mitigation, in the absence of more detailed understanding of individual firms and their requirements at this stage, it is conservatively assumed that the majority of displaced businesses are unable to satisfactorily relocate in 2022 and their trade is severely disrupted. The impact is deemed high in 2022. On a high sensitivity receptor, this results in a **major adverse (significant)** effect. The effect will reduce over time as businesses and employees find new premises, new jobs or other solutions. The Applicant is committed to ongoing engagement with these businesses to minimise this impact and this is discussed in the mitigation section of this chapter.

CSA

- 7.248 An estimated 80% of displaced businesses are industrial uses, which the baseline identified as being constrained in terms of identified alternative sites within the CSA.

- 7.249 Local stakeholders have highlighted that many of the businesses currently on-site are ‘bad neighbour’ uses (all of which are located at the Kent Project Site). There is no formal definition of this, but estimates have been undertaken (Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3) presents more detail on these estimates). In the general sense, it typically involves businesses that are disruptive to the local community in terms of visual quality, noise and air pollution. Two scenarios (a central scenario and worst-case scenario) have been set out to reflect the varying degree and uncertainty of bad neighbour uses within the PSB:
- In the central scenario, of the 94 identified businesses, 32 are considered to be ‘bad neighbour’ uses, making up 34% of firms and employment and 41% of total occupied floorspace; and
 - The worst-case scenario (which encompasses a wider range of businesses that could be classed as ‘bad neighbour’ uses) indicates that 54% (27,200m²) of the potentially displaced floorspace within the PSB could be bad neighbour uses. Under this scenario, these businesses may find it harder to find new space due to a lack of alternatives.
- 7.250 Local policy states that there is a need for a household recycling centre in Dartford. The analysis in this section has identified two recycling centres within the PSB, although these two facilities focus on industrial recycling rather than publicly accessible household recycling. Therefore, whilst their displacement represents a loss of this provision, it is not a loss of the identified constrained use for household provision.
- 7.251 In this worst case scenario, there would be negative impacts on both residents and businesses: the residents would lose services (though there are alternatives for some of the businesses) and the businesses (and their employees) would need to relocate outside of the CSA or may be unable to function anymore. Kent County Council has identified that there are limited alternative options for some of the businesses on the industrial estates, particularly the bad neighbour uses. The displacement of industrial floorspace could further exacerbate the wider trend of industrial displacement (explained in the baseline), forcing firms to relocate to other areas within the constrained industrial market corridor. These factors could have implications for neighbouring authorities (and their residents) where they relocate. However, many alternative sites will be allocated for industrial use and therefore more appropriate so will be less likely to have an impact on residents near those sites.
- 7.252 There will be some benefits to residents near the Project Site due to the displacement of bad neighbour uses. This is particularly relevant for the local areas, many of which perform badly in terms of deprivation, so the reduction in the bad neighbour uses would enhance the residents quality of life.
- 7.253 There may also be an impact on the local industrial capacity in the CSA. The Thames Gateway corridor – an area stretching 70km east from inner east London, which includes the CSA – has been recognised as one of several regions that have absorbed the industrial floorspace functions that were historically supported in London. As a result, the regions

in the Wider South East have combined to form an integrated industrial FEMA (functional economic market area).¹²⁴ At present, VOA data show that industrial floorspace makes up 64% (2.6m sqm) of total floorspace across the CSA. This compares to only 29% across London. Industrial floorspace in the CSA has increased by 17% over the last 10 years, whilst London has seen a 10% reduction over the same period. Consequently, the loss of industrial floorspace within the CSA might directly disrupt the supply chain linkages that underpin the efficiency and productive capacity of the industrial FEMA. The amount of displaced industrial floorspace within the PSB is however only equivalent to 1.6% of the total industrial floorspace across the CSA. In this context, the impact of the loss of this floorspace on the industrial capacity of the CSA and wider FEMA is considered to be relatively small.

- 7.254 In the worst case scenario described in this effect, there would be a loss of 1,160 jobs. Whilst this is material for the individual business and their workers (and assessed above at that PSB level), is a relatively small proportion of the jobs and businesses in the CSA: these jobs make up less than 1% of the total jobs (all sectors) and businesses in the CSA.
- 7.255 Of these lost jobs, 940 are industrial which represents less than 2% of the industrial jobs supported across the CSA. The impact on the labour market is therefore not expected to be significant, even specifically within the industrial sector.
- 7.256 There would also be an impact on residents of the CSA who use the services of these businesses. Similarly to the impact on the businesses across the CSA, this impact would be adverse as it may result in residents having to travel further for similar services. There are however alternatives for most of the services elsewhere within the CSA and the many of the types of services provided mean that the frequency of use is limited. At the CSA level, the impact on residents will be adverse but low.
- 7.257 Overall, pre-mitigation, the magnitude of impact of the displacement on CSA businesses and residents is expected to be low. On a medium sensitivity receptor, this results in a permanent effect on businesses and residents which is **minor adverse** at the CSA level in 2022 (**not significant**).

Potential temporary or permanent displacement / loss of community uses, such as open spaces, public rights of way and other recreational or community facilities

- 7.258 This assessment focuses on the direct effects of the London Resort on community uses. Direct effects include direct severance or displacement or change in access to a community use. Indirect effects relating to environmental changes are assessed in Chapter 8: *Human health* (document reference 6.1.8).
- 7.259 The table below outlines for the criteria for assessing magnitude of impact at each of the community uses.

¹²⁴ GLA, 2017, Industrial Land Demand, page 200

Table 7.32 Impact magnitude definitions for community uses

Impact	Definition
High	The community use is permanently improved with better accessibility or suitable re-provision in the area, or the route/open space is permanently displaced or disrupted to the extent that it is no longer fit for purpose, with no re-provision within a suitable geographical area.
Medium	The community use is partially improved with no change to accessibility or improved accessibility with no improvement to the route/open space. Or, the route/open space is partially displaced or disrupted, having a substantial impact on its users and/or the route/open space is wholly displaced, but is unlikely to have a large impact on its users.
Low	The community use is not permanently displaced, but its operation is temporarily affected as a result of the London Resort. It will be returned to use following the short-term, reversible impact.

7.260 Table 7.33 outlines the magnitude of impact and overall effect significance for each community use identified in the baseline, based on the above methodology.

Table 7.33 Impact effect significance of the London Resort on community facilities, PRoW, routes and open spaces

Community use	Type	Local authority	Impact of the London Resort	Sensitivity + impact	Significance
Community facilities					
Public convenience facility	Public community facility	Dartford	This facility is expected to be lost as a result of the London Resort, however the loss to the community is not considered to be severe as provision is within targeted levels and public toilets will be provided in the London Resort.	Low sensitivity + Low impact	Negligible (not significant)
PRoW and routes					
DS1	PRoW	Dartford	<p>DS1 to be diverted north to make way for Gate One in this area. Alignment of diverted PRoW to connect from flood defence at Bell Wharf to the pylon and then continue inland parallel to the resort edge and adjacent to newly constructed reedbed and swale system.</p> <p>To follow the alignment on the top of the proposed flood embankment to be created in the form of an engineered bund to replace existing flood gates in the zone between Bell Wharf and the resort.</p> <p>Western section is a narrow compacted earth track along a retired earthwork flood defence on the shoreline (approx. 2m high).</p> <p>The London Resort is proposing a permissive path along the top of the raised flood defence north of Black Duck Marsh, and a further permissive route along the bottom of the landward side. This will be a segregated route for cyclists and pedestrians.</p> <p>It is proposed that this route will be promoted as a 'fitness trail' with gym equipment provided at intervals along the route.</p>	Medium sensitivity + Medium impact	Moderate beneficial (significant)
DS2	PRoW	Dartford	To be diverted alongside the proposed resort road to provide more direct access to the ferry Terminal and facilitate the development and operation of Gate One.	Low sensitivity + Medium impact	Minor adverse (not significant)
DS12	PRoW	Dartford	Route to be diverted alongside the proposed resort road to facilitate the development and operation of Gate One. Gate One. A shared cycleway / footpath of 4m width (2m cycle lane and 2m	Low sensitivity + Medium impact	Minor beneficial (not significant)

Community use	Type	Local authority	Impact of the London Resort	Sensitivity + impact	Significance
			footpath) will be provided and separated from the resort road by a landscaped verge. The footpath will be routes along a raised boardwalk through the eastern edge of Black Duck Marsh to provide increased amenity value. Cyclists will use the resort road, which will be lightly trafficked.		
DS17	PRoW	Dartford	Footpath to be temporarily closed while works are being carried out. Footpath experience to be improved with review of fencing and opening up of connections to Bamber Pit along the route.	Medium sensitivity + low impact	Minor beneficial (not significant)
DS30	PRoW	Dartford	Minor diversion to Footpath DS30 to align with the Resort boundary along the western edge of Gate 2 and include seating and viewing areas alongside to allow appreciation of Black Duck Marsh to east.	Medium sensitivity + Low impact	Minor adverse (not significant)
DS31	PRoW	Dartford	Footpath to be temporarily closed. Pilgrim's Way footpath from Galley Hill Road to Manor Way to be retained on existing alignment. Footpath to be resurfaced and graded on chalk ramp down from Galley Hill Road. Path will be split half way with route heading right to Arrival Plaza and left ramping down to provide a separate route for people not entering the resort. Dead elm and scrub vegetation along the route to be removed to increase safety and security and individual trees to be planted to provide replacement habitat and visual amenity.	Medium sensitivity + Low impact	Minor beneficial (not significant)
Existing track at top left of Broadness Marsh	No official status	Dartford	Vehicular access to Broadness Creek users to be provided alternative route.	Low sensitivity + Low impact	Negligible (not significant)
NU1	PRoW	Gravesham	To be retained along existing alignment and upgraded to provide improved access.	Medium sensitivity + Low impact	Minor beneficial (not significant)
The network of pathways through	No PRoW status	Gravesham	Currently flooded in places for much of the year. Proposal to replace all or part of these pathways with new boardwalks and	Medium sensitivity + low impact (con)	Minor adverse (not significant)

Community use	Type	Local authority	Impact of the London Resort	Sensitivity + impact	Significance
Botany Marsh			include bird observation tower in order to encourage flooded marshland landscape and still allow controlled visitor access.	Medium sensitivity + medium impact (op)	Moderate beneficial (significant) (op)
Existing track at top of Broadness Marsh	No official status	Dartford/Gravesham	The land is currently private land and access is prohibited. To be lost to allow for new inter-tidal habitats to be formed along shoreline. Proposals would create access through this area in the form of a nature trail slightly set back from the river bank at the higher level on the mid-terrace to separate public from the salt marsh area and reduce impacts on birds. Would be an improvement in access terms.	Low sensitivity + medium impact (con) Low sensitivity + high impact (op)	Minor adverse (not significant) (con) Moderate beneficial (significant) (op)
Open spaces and marshes					
Black Duck Marsh	Marsh	Gravesham	Improvements will be made to the routes to the north side of Black Duck Marsh, integrated with the required works to raise the flood defence in that area. Improved signage and surface treatments will be included. Along the eastern perimeter of Black Duck Marsh, a new boardwalk is proposed to create a connection between the ferry terminal and the resort. There will also be improvements to routes through Botany Marsh east. Existing routes are prone to flooding and the new routes are proposed in the form of boardwalks. New bird watching towers or hides will be provided in Black Duck and Botany Marshes. Negative impacts of the increased demand for the marsh as a result of the new visitors and residents are expected to be outweighed by these improvements.	Medium sensitivity + medium impact	Moderate beneficial (significant)
Botany Marsh	Marsh	Gravesham	Botany Marsh (west), which currently has no public access, will be lost due to the redevelopment. For Botany Marsh (east), there will be improved visitor facilities provided including a new bird watching tower, network of trails and boardwalks to allow for	Medium sensitivity + medium impact	Moderate beneficial (significant)

Community use	Type	Local authority	Impact of the London Resort	Sensitivity + impact	Significance
			<p>controlled year-round accessibility for all and clear signage and interpretation boards. The existing amenity space will be retained for use as a picnic area and for informal recreation usage with improved access facilities.</p>		
Broadness Salt Marsh	Marsh	Gravesham	<p>Currently not accessible to the public, and it is proposed to open up this area with controlled public access (in order to provide the accessibility benefit whilst limiting harm to sensitive habitats). A nature trail is proposed around the new coastline, which aligns with the aspirations within the Ebbsfleet Garden City framework document.</p> <p>Broadness Creek is an area of high biodiversity value due to salt marsh habitats. It is also an area with a unique social and cultural character. Therefore, interventions are limited in this area. The network of nature trails will pass nearby but will be set back from the harbours edge. A new watercourse is proposed between the northern boundary of the resort, alongside Botany Marsh and connecting to Broadness Salt Marsh. This feature will include constructed wetlands to treat storm water and greywater from the resort. A footpath is proposed alongside this feature, that will connect through to Broadness Creek. This route may also be the primary access track for residents to access the harbour.</p> <p>Negative impacts of the increased demand for the marsh as a result of the new visitors and residents are expected to be outweighed by these improvements.</p>	Low sensitivity + High impact	Moderate beneficial (significant)

- 7.261 For the one community facility directly displaced (a public convenience), this assessment has concluded that there will be a **negligible** effect (**not significant**).
- 7.262 For the 10 PRoWs and routes directly affected, eight have both construction and operational effect assessed together. Of these, there is expected to be one **moderate beneficial** effect (**significant**), four **minor beneficial** effects (**not significant**), one **negligible** effect (**not significant**) and two **minor adverse** effects (**not significant**). For the other two, the effects are different for construction and operation. For both, it is concluded that the construction effect is **minor adverse** (**not significant**) and that the operational effect is **moderate beneficial** (**significant**).
- 7.263 For the three marshes affected, this assessment has concluded that there will be **moderate beneficial** effects (**significant**) on all once operational.

Displacement of residential dwellings as a result of property acquisition

- 7.264 The Applicant would acquire 19 London Road in order to enable construction of the visitor centre and also to create a pedestrian entrance to the Resort via Pilgrims' Way. The assessment year for this effect is 2022; the earliest date at which this displacement could take place, although it is noted that the impact is expected to reduce in the years following this as the residents become settled in new accommodation. The dwelling displacement effect is assessed at the Dartford housing market level.
- 7.265 The baseline found that the Dartford housing market had a high sensitivity to dwelling displacement effects. The displacement of three dwellings will decrease existing Dartford stock by 0.01% and equates to 0.06% of the future identified requirement in the five year housing supply (2019-2024). The deliverable sites over this period are at 113% of the identified requirement, so the borough will still be at over 100% requirement after the displacement. Overall, whilst the impact will be material for the residents of the three dwellings concerned, the magnitude of impact is expected to be negligible at the Dartford level. On a high sensitivity receptor, this results in a **minor adverse** effect at the Dartford housing market level in 2022 (**not significant**).
- 7.266 The mitigation section at the end of this chapter presents the Property Compensation Policy.

Potential temporary or permanent disruption to housing delivery as a result of the land take and construction works

- 7.267 The London Resort DCO limits overlap with the following areas allocated for housing:¹²⁵
- Station Quarter South, over which would run the London Resort Access Road (alongside the existing HS1 line). SQS has maximum consent for 1,390 homes in the Ebbsfleet Development Framework 2017; and

¹²⁵ EDC, 2017, Ebbsfleet Development Framework

- Station Quarter North, over which would be built the multi storey car park. SQN has maximum consent for 930 homes in the Ebbsfleet Development Framework 2017.

7.268 The London Resort will provide some on-site accommodation for staff (500 units for up to 2,000 staff, with an estimated occupancy of 1,800) and hotels for visitors, but no market housing would be provided. The land take of the London Resort could therefore impact housing delivery. However, it is unclear to what extent housing will be inhibited in these areas. The true counterfactual is not the lost housing allocation in the areas, but the likelihood that any housing would have been delivered in the area in the absence of the London Resort. As discussed in the effect of employment and visitors on housing delivery (paragraphs 7.323-7.356), the EDC has been historically challenged in meeting its housing delivery targets.¹²⁶ Indeed, in Dartford's five year deliverable sites plan (Diagram 7.3.18 in Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3)), the area has no units allocated to the location. It is understood that the EDC is focusing on delivery at other allocated sites. They are also looking to rebalance the existing planning permission towards a higher residential content which will mitigate any loss of allocated land or delay of residential to some extent. Therefore, despite the maximum parameter housing allocation by the EDC, it is likely not the case that this many homes will be 'lost'.

7.269 The construction of this road will be planned for and carried out with due consideration for the delivery of housing in this area, including 80% of the materials coming from the Port of Tilbury by barge, minimising impact on the roads. The London Resort will liaise closely with EDC and DBC to ensure any construction operations have minimal impact on the delivery of Ebbsfleet Central.

7.270 Based on the land take of the access road (including a generous buffer to account for the land that is required permanently around it and a further buffer for potential undevelopable land between roads), it is estimated that 13.7% of Station Quarter North and 15.0% of Station Quarter South would be lost permanently due to the land take of the London Resort. This is a low proportion of the land and it is far from definitive that this would directly result in a reduction in housing delivery on the remaining land. However, even if it did result in a reduction in housing delivery proportionate to the land taken by the roads, this would only reduce housing delivery by less than 350 homes. Given the London Resort itself is providing onsite accommodation of 500 units (whilst not like for like in terms of market housing), this would more than offset any loss of housing delivery. The combination of a low disruption to the allocated sites, minimal actual land take, coupled with the fact the EDC masterplan is actively evolving with a view to intensify residential delivery and is not actively focusing on these sites in the short term, suggests that the London Resort is at worst case only likely to slightly impair/delay housing delivery, and in reality not likely to materially adversely affect housing delivery here at all.

7.271 Overall, due to the relatively low impact on the allocated sites, the prioritisation of other

¹²⁶ Ebbsfleet Development Corporation, 2019, Planning and Housing Delivery Dashboard, Annex F. Retrieved from <https://ebbsfleetc.org.uk/wp-content/uploads/2019/10/EDC-019-078-Planning-and-Housing-Delivery-Annex-F.pdf>. Accessed December 2020.

sites and likely ability to increase the residential content across other allocated sites, the magnitude of impact is expected to be negligible. On a receptor of high sensitivity, this results in a **minor adverse** effect for homes and residents at the Dartford level in 2022 (**not significant**).

POTENTIAL SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSALS - OPERATION

Potential effects associated with net additional employment (including indirect and induced effects, and characteristics of jobs generated by the project)

7.272 This section considers the direct, indirect and induced effects of the London Resort. The range of employment types, occupations and skills is considered in the potential effects of new employment on skills and training.

Gross direct employment

7.273 The direct employment estimated to be supported by different elements of the London Resort is summarised in Table 7.34. The estimates were provided by Leisure Development Partners (LDP), a specialist in attractions and leisure real estate, with global experience in understanding theme parks and their key performance indicators (KPIs). The LDP approach relies upon detailed market analysis and the application of carefully chosen real world benchmarks from existing comparable projections. This approach has evolved from original feasibility work for Disney and has been developed further over the past 50 years. Appendix 7.5: *Staffing Technical Note* (document reference 6.2.7.5) provides a detailed explanation of LDP's expertise and its approach to job estimation. The outputs have been peer reviewed and supported by MR-ProFun, an industry leader in consulting and management services for the attractions industry with a long track record in staff forecasting.

7.274 The jobs estimates vary by element of the London Resort:

- theme park employment has been estimated based on international and European theme park benchmarks and a calculation of visits per FTE employee;
- water park employment has been estimated based on European Indoor Waterpark benchmarks, focusing on attendees per FTE employee;
- employment in dining was estimated based on industry benchmarks, supplemented with research of specific restaurant groups;
- retail employment was estimated based on standard employment densities, supplemented with research of selected examples (e.g. the Disney Store);
- employment in entertainment was estimated based on a ratio of visits per FTE;

- hotel jobs have been estimated based on staff per key ratios and UK and international benchmarks by type of accommodation.

- 7.275 The baseline provided the basis for our assumption that the businesses that occupy the Project Site currently support approximately 1,040 FTEs, which equates to an estimated 1,160 jobs. As found in the assessment of the potential temporary or permanent displacement / loss of businesses and other services it is assessed in the worst-case that many of these jobs will be lost. Table 7.34 also shows the additional direct jobs on-site – i.e. how many jobs the London Resort will support on top of the jobs currently supported on site.
- 7.276 The London Resort is expected to reach maturity around 2037 and jobs would be expected to stabilise thereafter. Thus, the estimated jobs on site in 2038 is the same as the 2037 estimate. The job estimate for the opening year of Gate Two (2029) is also expected to be the same as the number of jobs supported in the 2030 assessment year.
- 7.277 Table 7.34 shows the number of direct jobs split by full-time/part-time, seasonal jobs, total jobs and FTEs by year. There are expected to be 17,310 jobs supported directly on site by 2037, of which 16,145 would be on top of the jobs currently supported on site. This equates to approximately 11,215 FTEs by 2037, 10,170 of which would be additional to the jobs currently supported on the Project Site (across both the Kent Project Site and Essex Project Site).³⁹ The London Resort would be one of the largest single-site employers in the UK.
- 7.278 The London Resort is expected to reach maturity around 2037 and jobs would be expected to stabilise thereafter. Thus, the estimated jobs on site in 2038 is the same as the 2037 estimate. The job estimate for the opening year of Gate Two (2029) is also expected to be the same as the number of jobs supported in the 2030 assessment year.
- 7.279 The number of jobs supported by the London Resort depends upon many factors. LDP has a selection of industry leading KPIs which enable them to make estimates of the employment levels. These are derived from attendee per FTE job metrics, which in turn are dependent upon the type and quality of the attraction and the opening hours, among other factors. LDP also provided indicative staff ranges to enable the certainty around the central estimates to be defined. These suggest that the downside risk with regard to employment numbers is in the region of 25%-30%. A reasonable worst case scenario for the purposes of socio-economic assessment would therefore be to assume that in 2038 the London Resort employed a headcount of c. 12,100 people, equating to 7,900 FTEs. Allowing for the displacement on site, this would equate to 11,300 additional jobs or 7,100 additional FTEs.

Table 7.34 London Resort: direct jobs (full time, part time seasonal, total headcount, FTEs, by key assessment year)

	2025					2029 and 2030 ¹²⁷					2037 and 2038 ¹²⁸				
	FT	PT	Seasonal	Total headcount	Total FTE	FT	PT	Seasonal	Total headcount	Total FTE	FT	PT	Seasonal	Total headcount	Total FTE
Corporate / shared services	250	30	-	280	265	250	30	-	280	265	250	30	-	280	265
Theme parks	1,105	1,045	2,940	5,085	2,800	1,825	1,655	4,630	8,110	4,505	2,710	2,420	6,760	11,890	6,625
Hotels	1,365	225	-	1,590	1,475	2,335	400	-	2,740	2,540	2,570	430	-	3,000	2,785
The Market (RDE)	715	640	165	1,520	1,100	770	670	60	1,500	1,150	835	745	165	1,745	1,275
Other	155	55	125	335	235	170	65	150	380	260	170	65	155	395	265
Total	3,590	1,990	3,230	8,810	5,880	5,350	2,815	4,835	13,010	8,720	6,535	3,690	7,080	17,310	11,215
Gross additional				7,650	4,835				11,845	7,675				16,145	10,170
PROPORTION OF JOBS															
Corporate / shared services	7%	2%	0%	3%	5%	5%	1%	0%	2%	3%	4%	1%	0%	2%	2%
Theme parks	31%	53%	91%	58%	48%	34%	59%	96%	62%	52%	41%	66%	95%	69%	59%
Hotels	38%	11%	0%	18%	25%	44%	14%	0%	21%	29%	39%	12%	0%	17%	25%
The Market (RDE)	20%	32%	5%	17%	19%	14%	24%	1%	12%	13%	13%	20%	2%	10%	11%
Other	4%	3%	4%	4%	4%	3%	2%	3%	3%	3%	3%	2%	2%	2%	2%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

¹²⁷ Opening and the first full year of Gate Two so estimates are appropriate for both years.

¹²⁸ Theme park attendance and associated employment assumed to have reached ‘stability’ by this year and thus the same estimates are appropriate for both years

Land use

7.280 The table below shows the existing and proposed commercial floorspace at the London Resort.

Table 7.35 Existing and proposed land uses at the London Resort

Existing		Proposed	
Use	m ²	Use	m ²
Retail, store or showroom	800	C1 – Hotels	241,100
Industrial / Manufacturing	11,000	C4 – Houses in multiple occupation	126,500
Light industrial	7,400	E – Commercial	4,400
Storage	48,600	Sui Generis	659,300
Offices	1,300		
Total	69,100	Total	1,031,300

Sources: Apt, 2020; VOA, 2020

Net additional employment

Headline summary

7.281 The London Resort is projected to boost direct employment in the CSA by 8% in 2038. Once leakage, displacement and multiplier impacts are taken into account, the London Resort is expected to generate 21,600 net additional jobs by 2038 at the LCA level. This figure increases significantly at the national level, with the creation of 28,700 net additional jobs across the UK by 2038. These jobs are likely to offer a diverse range of opportunities to stimulate and provide business opportunities for local firms (e.g. florists, hoteliers, security firms and catering etc), including a vast array of creative-based jobs (entertainers, actors, designers, musicians, gamers, etc). The creative opportunities in the enhanced supply chain will contribute to the employment aspirations brought forward by the Thames Estuary Production Corridor – a cluster of creative and cultural industries along the River Thames. The London Resort will benefit from and build on the IP and success of film and digital media industries and has an important role to play in supporting the future growth and prosperity of these industries and wider area as a whole.

Policy guidance

7.282 The previous analysis has dealt with gross employment (i.e. direct jobs on-site). The Homes and Communities Agency (HCA)¹²⁹ Additionality Guide provides a framework for estimating the additional effects of a proposed development:¹³⁰

¹²⁹ The HCA is the national housing and regeneration body for England. In 2018, it was replaced by Homes England.

¹³⁰ Homes and Communities Agency (2014), The Additionality Guide

Leakage

- 7.283 Relating to employment from outside the target area – this is the proportion of jobs taken by people who live outside of the study area. Based on the estimated staff distribution (as derived in potential effects of new employment on skills and training), it is estimated that 95% of workers would live in the LCA. Whilst the employment and skills initiatives – presented in Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7)– would seek to minimise this leakage, for example by maximising take up of jobs by local people), this existing leakage rate (from the 2011 Census) is used in order to be conservative when assessing net effects.

Displacement

- 7.284 The proportion of jobs that would otherwise have been supported elsewhere. The Additionality Guide notes that *'displacement arises where the intervention takes market share . . . from existing local firms or organisations'*. The guidance advises that when there are likely to be a greater number of enterprises providing the same product or service at a larger geographical then displacement at a larger area is likely to be greater. However, in a scheme of this nature whereby its very nature there are no other direct comparators within the UK, it is believed that displacement will be significantly lower than other schemes.
- 7.285 According to Aecom, a global infrastructure firm who write an annual Global Attractions Report, as of 2018, global 'attendance at themed attractions at the major operators has exceeded half a billion visits for the first time in history. This is equivalent to almost 7% of the world population. And not only that, but this number keeps growing. Just five years ago, the market capture of the industry was only 5% of the global population.'¹³¹ This shows that there is strong growth within the global theme park market. The future baseline (Table 7.16) also indicates that the national population is expected to grow by 9% between 2018 and 2038. With no theme parks of this calibre present here, the UK is unable to capture any of this growth in the market. Similarly, the London Resort would expand the existing market into new sectors through offering different options, such as e-Sports. Adding a product/venue of this nature in the UK is deemed to be nationally significant and it is likely that it will capture future growth in the market, rather than displacing existing activity. A project of this scale will realise the growth in the theme park and other linked markets that will not otherwise be met in the UK. On the basis of these trends and evidence base, it is therefore judged that the London Resort would result in minimal displacement.
- 7.286 Nonetheless, to reflect uncertainty in estimates of net additionality, two scenarios are presented in this assessment. An upper scenario with a displacement factor of 25% at the LCA level from the additionality guide, which can be described as *'expected to be some displacement effects, although only to a limited extent'*. A lower scenario uses a 'medium' displacement factor of 50% from the Additionality Guide. For the reasons outlined above,

¹³¹ Aecom Global Attractions Report, 2018

both factors are expected to be conservative estimates of the level of displacement.

Multiplier effect

- 7.287 The indirect benefit to other sectors supported by the London Resort, generated through both the supply chain and worker expenditure. Due to the size and national significance of the London Resort, these impacts are likely to be substantial. The scale of the multiplier effects varies substantially by intervention, sector area and geographical area. They are influenced in particular by factors including the extent of supply chain linkages and the proportion of additional income spent by workers within the relevant area of analysis.
- 7.288 The London Resort will create opportunities to stimulate and provide business opportunities for local firms (e.g. florists, hoteliers, security firms and catering etc) and also creative ones (entertainers, actors, designers, musicians, gamers, etc). The creative opportunities in the supply chain align with the Thames Estuary Production Corridor – a ribbon of creative and cultural industries along the River Thames.¹³² The London Resort will benefit from and build on the IP and success of film and digital media industries and has an important role to play in supporting the future growth and prosperity of the creative industries, increasing the local supply chain and supporting growth in the Thames Estuary.
- 7.289 According to the HCA Additionality Guide (2014)¹³³ the total average output multiplier for a development is 2.2 at the UK level. This takes into account indirect and induced effects of employment (supply chain and employee expenditure) but does not take into account visitor expenditure. A development with strong linkages is expected to have a multiplier of 1.7 at the regional level. The Additionality Guide also notes that *‘the size of the multiplier is likely to be greater the larger the area over which the benefits of an intervention are being assessed’*.
- 7.290 A study found that one job at Disneyland Paris results in three jobs elsewhere in France.¹³⁴ This is equivalent to a composite multiplier of 4,¹³⁵ much larger than the multipliers provided in the Additionality Guide. Due to the similarities to Disneyland Paris in terms of scale, accessibility, location near a global city and type of attractions, this suggests that large multiplier effects are possible at the London Resort.

¹³² The vision was launched in 2017 by the Mayor of London in partnership with the London Economic Action Partnership, the South East Local Enterprise Partnership (South East LEP) and the South East Creative Economy Network (SECEN). Already, £4.6m of investment from central government has been directed into the Estuary, including £4.3 million for the Creative Estuary programme using culture as the catalyst for growth. Retrieved from <https://www.london.gov.uk/what-we-do/arts-and-culture/current-culture-projects/thames-estuary-production-corridor>. Accessed November 2020.

¹³³ Homes and Communities Agency (2014), The Additionality Guide

¹³⁴ Disneyland Paris (2013), 25 years of economic and social contribution

¹³⁵ A composite multiplier is a factor of the supply linkage (indirect) and income (induced) multipliers. The direct effect (a factor of 1) must be subtracted to find the multiplier effects alone. For example, say an intervention created 100 jobs, then the total direct and multiplier effects would be 132 if the composite multiplier were 1.32. The multiplier effects alone would be 32.

7.291 Two scenarios are also presented for multiplier impacts. At the national level, a lower scenario uses a multiplier of 1.7, which denotes a strong regional multiplier, and the upper scenario uses a multiplier of 2.2, which is the average at the UK level. The evidence from Disneyland Paris indicates that the use of these multipliers is conservative. At the LCA level, a lower scenario uses a multiplier of 1.3, which denotes a low regional multiplier, and the upper scenario uses a multiplier of 1.7, which is the high regional multiplier.

7.292 The multiplier impact estimates the induced employment as a result of worker income effects. It does not account for any induced activity supported as a result of the visitor and resident expenditure in the local area. Induced employment associated with the visitor and resident¹³⁶ expenditure has been estimated by dividing the additional visitor and residential expenditure by the GVA per worker of local workers in consumer services.

Table 7.36 Net additionality assumptions for the LCA and national levels. Showing two scenarios for leakage (the proportion of jobs taken by residents outside the study area), displacement (the proportion of jobs that would otherwise have been created elsewhere), and multiplier (additional jobs that are created as a result of the supply chain and worker expenditure generated by the London Resort).

	Lower scenario	Upper scenario
LCA level		
Leakage	5%	
Displacement	50%	25%
Multiplier	1.3	1.7
National level		
Displacement	50%	25%
Multiplier	1.7	2.2

7.293 Table 7.37 presents the total net additional jobs based on the assumptions on displacement and multiplier effects.

¹³⁶ The workers who will now be living on-site

Table 7.37 Net additional jobs created by the proposed London Resort, by year and scenario, national level

	2025		2030		2038	
	Lower	Upper	Lower	Upper	Lower	Upper
Gross additional total	7,700		11,800		16,100	
Net direct (displacement)	3,800	5,700	5,900	8,900	8,100	12,100
Net indirect and induced	2,700	6,900	4,100	10,700	5,700	14,500
Net induced (visitor and residential expenditure)	700	700	1,200	1,200	2,000	2,000
Net additional jobs	7,200	13,300	11,300	20,800	15,800	28,700

Sources: LDP (direct employment); Volterra calculations

Table 7.38 Net additional jobs created by the proposed London Resort, by year and scenario, LCA level

	2025		2030		2038	
	Lower	Upper	Lower	Upper	Lower	Upper
Gross additional total	7,700		11,800		16,100	
Gross additional in LCA	7,300		11,300		15,300	
Net direct (displacement)	3,600	5,500	5,600	8,400	7,700	11,500
Net indirect and induced	1,100	3,800	1,700	5,900	2,300	8,100
Net induced (visitor expenditure)	700	700	1,200	1,200	2,000	2,000
Net additional jobs	5,400	10,000	8,500	15,600	12,000	21,600

Sources: LDP (direct employment); Volterra calculations

7.294 In the context of future baseline levels of employment in the CSA (178,000 in 2025, 190,000 in 2030 and 211,000 in 2038), the magnitude of impact associated with the *direct* employment represents a 4%, 6% and 8% increase respectively above the future baseline levels of employment in the CSA. This is a medium impact in 2025 and high in 2030 and 2038 (medium sensitivity). This results in a permanent effect which is **moderate beneficial (significant)** in 2025 and **major beneficial (significant)** in 2030 and 2038.

7.295 In context of existing baseline levels of employment in the LCA (4.9m), the magnitude of impact associated with the direct, indirect and induced employment is low (between 0.2%-0.3% in all years and scenarios) (low sensitivity receptor) across all assessment years. This results in a permanent effect which is **negligible (not significant)**. Forecasts for future baseline employment level in the LCA are not available and so the impact is considered against the existing level of employment. Given the magnitude of impact is low, it is deemed unlikely that this would change even were LCA forecasts available.

7.296 In context of future baseline levels of employment nationally (33.4m-35.4m), the magnitude of impact associated with the direct, indirect and induced employment is low

(low sensitivity receptor) across all assessment years. This results in a permanent effect which is **negligible (not significant)**.

- 7.297 This assessment presents a conservative assessment of the net additional employment impact of the London Resort in line with EIA best practice. Based on the evidence of a higher multiplier from Disneyland Paris, the *Economic and Regeneration Statement* (document reference 7.5) finds that the London Resort could support up to 48,000 direct, indirect and induced jobs across the UK by 2038.

Potential effects of new employment on skills and training

- 7.298 The jobs created at the London Resort will support local jobs as well as new skills and training opportunities. This effect considers these two related effects – firstly the impact of London Resort on local working, and secondly the effects on skills and training for all job opportunities at the London Resort.

Local jobs

- 7.299 The above analysis estimates the number of jobs that would be supported on-site, but not all workers will live within the CSA. This effect is assessed at the CSA level because the local authorities assess skills contributions at this geography. Jobs will also be created for residents who live outside of the CSA but the contribution to jobs outside of this study area is unlikely to result in a potentially significant effect.
- 7.300 The level of local employment cannot be estimated based on existing commuting patterns to the area as Dartford identified during consultation. The existing commuting patterns reflect the current labour market. The London Resort would fundamentally change the labour market, making the area a much more attractive employment location.
- 7.301 The area is known to have high levels of out commuting, which has been identified as an issue during pre-application consultation. Through bringing a major employer to the area, the London Resort represents an opportunity to materially reduce the level of out commuting in the CSA.
- 7.302 The roles on offer will be wide ranging and varied, with around 60-65% of the jobs having no or limited entry requirements. In this way, there will be opportunities suitable to a large proportion of the CSA population, capturing much of the local employment opportunity.
- 7.303 Furthermore, the local employment created will have knock-on effects for the local economy. The workers will spend in the CSA, having induced employment effects. Some of this induced employment will occur in the CSA.
- 7.304 Overall, in the context of the CSA, the local employment benefits represent a low level of impact in 2025 and 2030 and a medium level of impact in 2038 (medium sensitivity receptor). This results in a permanent **minor beneficial** effect (**not significant**) in 2025

and 2030 and a permanent **moderate beneficial** effect (**significant**) in 2038.

7.305 The conclusion on magnitude of impact is pre-mitigation. The additional mitigation section contains the assessment of the residual effect after considering local employment initiatives from the Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7).

Skills and training

7.306 Once operational the London Resort will support local jobs and provide opportunities for skills and training for its staff. Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7) details the skills likely to be required at the proposed development. As a summary, the London Resort's staff profile would have the following four characteristics.

- **A large share of the jobs on offer would have low entry requirements.** It is estimated that 63% of the jobs in 2038 would have no or limited entry requirements (62% in 2025 and 2030). This means that those CSA residents who have low/intermediate qualifications could have access to these jobs too. Key for success will be raising awareness amongst locals of the job opportunities on offer at the London Resort, especially among priority groups such as the previously unemployed, and ethnic minorities.
- **The diversity of jobs on offer would help transform the local economy.** Opportunities would be available in distinct and diverse roles, such as lifeguarding, entertainment, food and beverage (F&B) roles, and others (in all of 2025, 2030, and 2038). Local residents would have a wider selection of jobs to choose from, and a broader range of career paths available to build their futures on.
- **Significant progression opportunities would be available.** It is envisaged that promotion to team leader in areas as diverse as F&B, attractions supervision and security would often be dependent on leadership skills, performance in entry-level roles, and the experience gained there. The lack of degree-level qualifications might not be a barrier; and
- **A large proportion of jobs would be in the knowledge economy.** The operation and general management of the London Resort would require the work of diverse professionals, from accountants, IT workers, legal professionals, engineers and marketing specialists. This could help increase productivity and create high-skill clusters in the CSA.

7.307 These skills development opportunities are persistent in their impact. The residents who benefit from the training retain the new skills for the remainder of their careers, whether at the London Resort or elsewhere.

7.308 Skills development is a core theme of local, regional and national policy. All host local authorities have overarching aims of improving the skills of their residents so that they are able to access higher skilled employment with greater earnings potential. The London Resort will support this ambition.

- 7.309 The London Resort will also give employment and skills providers valuable opportunities to achieve their aims of providing skills and training opportunities.
- 7.310 Overall, the impact of the skills opportunities on both residents and employment, skills and training providers are expected to be low in 2025 and medium in 2030 and 2038 (high sensitivity receptor). This results in a permanent **moderate beneficial effect (significant)** in 2025, and **major beneficial (significant)** 2030 and 2038.
- 7.311 The conclusion on magnitude of impact is pre-mitigation. The additional mitigation section contains assessment of the residual effect based on a summary of the skills initiatives outlined in Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7). This includes local skilling initiatives and key pledges, including coordination and partnerships between employers and providers such that the opportunities are efficiently matched to the residents. The initiatives in the strategy are designed to efficiently match the local issues and objectives in the local area, maximising the benefits available.

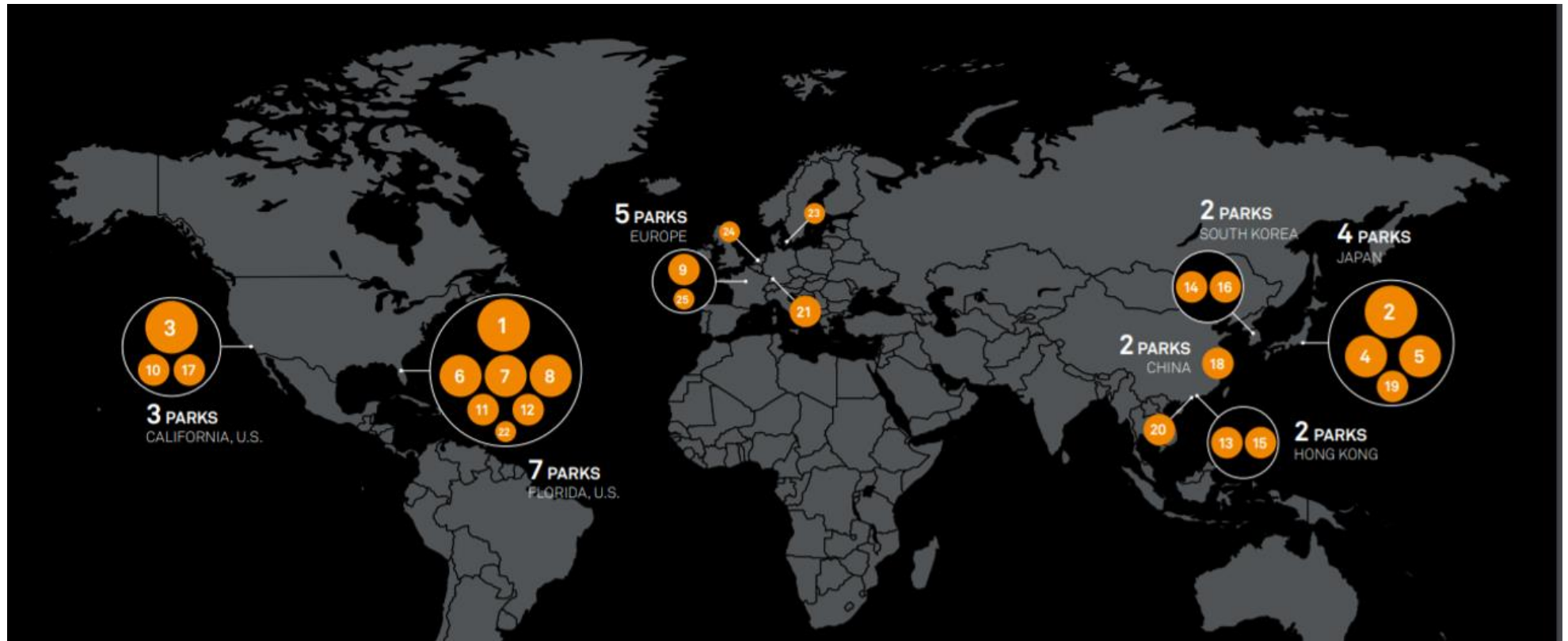
Potential effects of trade creation and diversion relating to theme parks

- 7.312 The London Resort will provide a tourist attraction unlike any that currently exists in the UK. It may be perceived to attract some trade away from similar attractions that already exist in England. This effect is assessed at varying spatial levels – nationally to cover the impact of trade creation through having a global resort in the UK, and regionally, to cover the impact of trade diversion from existing theme parks.
- 7.313 As shown in the baseline assessment earlier in this chapter, of the top 20 amusement/theme parks across EMEA in 2019 (by visitor number), four were in England (refer to paragraph 7.145). In order of number of visitors, these were Legoland, Alton Towers, Thorpe Park and Chessington World of Adventures. Diagram 7.2 presents information on these theme parks, showing that in 2018 they each attracted between 1.7m and 2.3m visitors.
- 7.314 The London Resort is expected to attract a combined annual attendance of around 6.5m in 2025 and 12.5m in 2038, which is between almost three and five times greater than Legoland, the current highest by visitor number in the UK.
- 7.315 The UK does not currently have a global calibre entertainment resort. Diagram 7.3 shows the clustering effect of the top 25 theme parks in the world as evidence that there can be successful co-location of theme parks.¹³⁷ Evidence presented in paragraph 7.151 estimated that the UK's population and tourism arrivals indicates that the UK could support 2-3 global calibre theme parks; at present it does not have a single one. Diagram 7.3 further demonstrates geographically that many of the top 25 global theme parks successfully co-locate. Indeed, the locations of three of the UK's top four theme parks

¹³⁷ The map is based on 2014 data so may now be out of date. There are more recent releases of the theme park attendance report but the equivalent map showing the extent to which the theme parks cluster is not provided.

are already located within relatively close proximity (Diagram 7.3).

Diagram 7.3 Map of the top 25 global theme parks, 2014, showing how they are clustered



Sources: AECOM, Theme Index and Museum Index: The Global Attractions Attendance Report, 2014

7.316 The design of London Resort is such that it will have a diverse offer, including other attractions such as the Market, the Coliseum, a ‘conferention’ centre and water park, among other things. The London Resort will be a unique global attraction that is likely to generate new trips rather than diverting from existing theme parks in the UK.

7.317 The London Resort would therefore add significantly to the UK’s theme park provision. The London Resort is expected to be additional at the national level for several key reasons.

- The baseline found that the theme park sector is a growing sector: This provides evidence that the new provision would not have a material impact on economic activity elsewhere in the sector and displacement is fairly low; and
- The theme park offering has not changed: as shown in the baseline (paragraph 7.145), Legoland is the most visited theme park in the UK. It was also the most recent addition, and it opened in 1996. Despite significant investment planned to re-energise many existing entertainment facilities across the country, there is no other major global theme park planned and there has not been a new major theme park since then despite the significant growth in the leisure and theme park sector.

7.318 Furthermore, it is anticipated that the London Resort would have a minimal impact upon trade diversion from the UK’s existing theme parks at the region level for the following reasons.

- **There is high demand for leisure attractions in London and the demand is growing:** London is a world leading destination. In 2018, 31m visitors stayed in London, of which approximately 19m were international visitors and 12m were domestic visitors. International visitors spent a total of £12.3bn and domestic visitors £3.0bn, with a combined total of £15.3bn. The Institute for Urban Strategies’ Global Power City index ranked London as the world’s leading global city for the eighth year in a row in 2019, ahead of New York (2nd) and Tokyo (3rd). There is significant demand for visiting leisure attractions in London: it is a world leader in theatre provision. According to the Society of London Theatre, in 2017, London had the biggest theatre audience of any city in the world, attracting over 15m people to its theatres.¹³⁸ In the decade to 2017, the capital’s theatre audience grew by 10%.¹³⁹ And between 2011 and 2016, the number of music tourists in the UK (from the UK and abroad) grew from 7.1m to 12.5m – an average increase of approximately one million music tourists each year.¹⁴⁰ There is significant demand for leisure and events in London and the UK.
- **The local visitor catchment has been growing and is forecast to continue to do so:** since 2000 the population of the Greater South East (East, London and the South East) has grown by 18%. Allowing for this, along with the same rate of leisure/events/venue demand, that growth would provide further evidence for a new venue to be

¹³⁸ Society of London Theatre, Reports Box Office Figures 2017

¹³⁹ Society of London Theatre, Reports Box Office Figures 2017

¹⁴⁰ UK Music; Wish you were here, the contribution of live music to the UK economy. 2017

accommodated without taking market share but instead meeting unmet demand, growing demand for leisure, and serving a growing population.

- **Any displacement is likely to be short-term:** evidence suggests that theme parks that are in close proximity to each other only have negative impacts for the first year of opening. For example, in 2010 a Harry Potter Themed attraction opened at the Islands of Adventure at the Universal Orlando resort in Florida. This only had a short-term impact on the number of visitors to Walt Disney World Resort, also in Florida, where visitor numbers had recovered by 2012.¹⁴¹

7.319 This demonstrates that there is significant demand for theme parks globally as well as tourism and entertainment in the UK specifically. The London Resort is therefore expected to result in overall market growth, and ultimately help to grow the UK's share of the global theme park market, benefitting all theme park operators. The London Resort would also expand the existing market into new sectors, such as e-Sports, which will be additional to the UK because of the lack of current provision. The likely effect of this is discussed in more detail in the potential effect on local retail and leisure (paragraph 7.375).

7.320 The London Resort is a unique global attraction and would be a step change in theme park provision. Rather than diverting visitors from existing attractions, it would be a different type of theme park with cutting-edge technology and new types of rides, entertainment and leisure. The global theme park market is growing. London and the South East are expected to grow significantly in coming years which will further increase demand for attractions. Yet there has not been a new major theme park built in England for many years, and the UK does not have a global calibre entertainment resort. The forecast visitor numbers would place London Resort in the list of top 25 global theme parks when compared against 2018 visitor numbers. Based on the forecast attendance numbers, it would be in the top 20 global resorts by 2025, top 15 by 2030 and top 10 by 2038. This is a substantial tourism impact on a global scale.

7.321 The magnitude of impact felt nationally, through creating a new global calibre entertainment resort, is expected to be high in 2025, 2030 and 2038 (high sensitivity receptor). This results in a permanent effect that is **major beneficial (significant)** at the national level in 2025, 2030 and 2038.

7.322 The magnitude of impact felt regionally, through increasing the competition for theme parks and potentially causing limited trade diversion, is judged likely to be temporary due to the fact that trade diversion typically occurs only in opening years (and so is deemed to result in a higher magnitude of impact in the opening years of Gates One and Two respectively than at maturity). Further reinforcing this, by 2038 it is expected that population growth, future baseline planned investment in other entertainment facilities across the country and wider trends in leisure and the 'experiential' will be more embedded, resulting in a lower overall magnitude of impact. The impact is therefore expected to be low in 2025, and 2030, and negligible in 2038 (medium sensitivity

¹⁴¹ Aecom/TEA Theme park Attendance Report 2013

receptor). This results in a temporary effect that is **minor adverse (not significant)** at the regional level in 2025 and 2030 and **negligible (not significant)** in 2038.

Potential effects of visitors and workers on local accommodation options and the housing market

7.323 The London Resort will directly deliver onsite worker accommodation and new hotel rooms in the CSA. The visitors at the London Resort will indirectly increase the demand for the local accommodation stock (both hotels and housing stock through short term rentals). In addition to this, the Resort's workforce could also increase the demand for the housing stock. All these elements could have different and interrelated impacts. The increase in visitors could have a positive impact if they increase the viability of the existing and future planned accommodation stock and there would also be associated spend and economic activity in the area. However, the increased accommodation demand (for serviced and non-serviced accommodation) could result in demand exceeding supply (if capacity does not expand to meet the demand) which could increase accommodation costs and result in positive and negative impacts for residents and tourists. This effect considers this complex range of issues.

Visitors

7.324 Analysis has been carried out to estimate the potential distribution of off-site hotel rooms required to accommodate visitors to the London Resort. The methodology and results of this analysis are described below.

7.325 Leisure consultant, LDP, estimated the visitor numbers to the London Resort on behalf of the Applicant. The LDP approach relies upon detailed market analysis and the application of carefully chosen real world benchmarks from existing comparable projects. This approach has been refined through detailed analysis of comparable attractions. The attendance to an attraction is a function of the size and characteristics of the available markets, the competitive environment, the quality of the experience and pricing strategy, as well as external factors. Therefore, the first step in an attraction feasibility process is to determine the current and likely future scale of the available market segments. For most attractions, attendance is determined by applying penetration rates to the available market segments, based on comparable benchmarks. All attractions in LDP's database are analysed in accordance with this methodology which allows benchmarking like for like. The approach varies by attraction, with specific penetration rates applied for the main park, second gate park, water park and retail, dining and entertainment zone. Appendix 7.6: *Attendance Technical Note* (document reference 6.2.7.6) provides a detailed explanation of LDP's approach to estimating attendance.

7.326 Based on this analysis, LDP estimates that there would be 6.5 million visitors to the London Resort in 2025 and up to 12.5 million visitors in 2038.

7.327 Analysis of induced overnight stays starts with these visitor numbers and estimates the number who would stay overnight, the broad distribution of where the overnight visitors would stay; and the distribution by local authority.

- 7.328 The first step of the analysis estimates the number of overnight stays by visitor type. The model starts from the estimated number of visitors to the London Resort as estimated by LDP and converts these into overnight visitors. Different types of visitor (primary resident, secondary resident, domestic tourist, and international tourist) will have different trip purposes and different propensities to stay overnight. For example, primary residents living within 60 minutes of the London Resort are assumed not to require overnight accommodation, while all international tourists are expected to require accommodation.
- 7.329 The number of visitors differs from the number of visits to the London Resort. Some people will visit Gates One and Two in a single day, generating two visits but representing just one visitor. Similarly, a large proportion of visits to the retail, dining and entertainment (Market) floorspace will be made by visitors already on site. The visitor numbers are therefore adjusted to account for ‘park hoppers’ and on-site RDE visits. Other adjustments are made to account for day trip MICE visitors, off-site waterpark guests and off-site RDE guests.
- 7.330 To estimate the number of visitors staying overnight, the analysis adjusts visitors by also removing those people who visit only for the day. These assumptions vary by category of visitor, with all primary residents assumed to make day trips and no international tourists expected to make day trips.¹⁴² Some secondary residents and domestic tourists make day trips, and some stay overnight.
- 7.331 This set of assumptions results in an estimated demand for overnight stays by visitors. The vast majority (85%-90%) of overnight stays are anticipated to be generated by domestic and international tourists, rather than primary (living within 60 minutes) and secondary (living within 60-120 minutes) residents.
- 7.332 Evidence from Disneyland Paris (DLP) provides some insight into the trip motivations of visitors to the theme park based on where those visitors live.¹⁴³ Table 7.39 shows the trip purposes of DLP visitors by visitor home origin. This distribution is used to proxy for demand for linked trips in the local area, linked trips with London, and combined with the distribution of day/night visitors already derived, to result in an estimated demand for overnight stays by study area.

¹⁴² These assumptions are simplifications (but reasonable ones). In reality, some primary residents might choose to stay and some international visitors might do a day trip, though these numbers are expected to be minimal

¹⁴³<https://www.marketscreener.com/EURO-DISNEY-67837/news/EURO-DISNEY-Press-Kit-Disneyland-Paris-Economic-and-Social-Impact-Study-14216747/>

Table 7.39 Disneyland Paris visitor trip purposes by home origin

Trip purpose	Local area (Seine-et-Marne area)	Domestic tourist (French Provinces)	Overseas
Theme park sole motivation	99%	77%	41%
Linked trip with Paris	1%	17%	34%
Linked trip other	0%	6%	25%

Source: DLP, Economic and Social Study

7.333 This results in a set of preferences of where visitors would wish to stay by broad area, derived from their trip purpose and motivation. This is shown in Table 7.40, which highlights that London Resort is the highest preference for where to stay (ranging from 44% to 63% depending on year), followed by London (18%-27%). The CSA attracts between 9% and 14% of demand. This scale of demand is affected by the underlying numbers of visitors by type, their preferences, and the number of rooms on-site.

Table 7.40 Overnight stay preferences of London Resort visitors by broad area

	2025	2030	2038
London Resort	50%	63%	44%
CSA	12%	9%	14%
One hour of resort (non-London)	13%	10%	16%
London	25%	18%	27%

7.334 The hotel room stock for Kent is taken from the latest accommodation audit in the county.¹⁴⁴ For areas outside Kent, the Visit Britain 2016 accommodation stock audits¹⁴⁵ are used. Occupancy levels were taken from Visit Britain.¹⁴⁶ *Airdna.co*¹⁴⁷ was used to proxy non-serviced rooms in London boroughs. For non-serviced accommodation outside London, the proportion¹⁴⁸ of UK households that engage with the non-serviced sector¹⁴⁹ was factored by listing rates and adjusted to reflect the level of tourism in the area.

¹⁴⁴ Visit Kent, 2019, Accommodation Audit

¹⁴⁵ [Visit Britain, 2016, Accommodation Stock Audit](#)

¹⁴⁶ <https://www.visitbritain.org/accommodation-occupancy-latest-results>

¹⁴⁷ Airdna.co is a website providing insight into the short term rental market, with specific focus on Airbnb and Vrbo websites. The data it provides is used in various documents to estimate the sector, including the 2019 Visit Kent Accommodation Audit.

¹⁴⁸ Capital Economics, 2019, The impact of short-term lets: Analysing the scale of Great Britain's short-term lets sector and the wider implications for the private rented sector

¹⁴⁹ Non-serviced accommodation includes the provision of accommodation in self-contained spaces consisting of complete furnished rooms or areas for living/dining and sleeping, with cooking facilities or fully equipped kitchens. This may take the form of apartments or flats in small free-standing multi-storey buildings or clusters of buildings, or single storey bungalows, chalets, cottages and cabins. Very minimal complementary services, if any, are provided. Retrieved from https://ec.europa.eu/eurostat/statistics-explained/index.php/Glossary:Holiday_and_other_short-stay_accommodation. Accessed September 2020

Appendix 7.8: *Construction Workforce Accommodation Strategy* (document reference 6.2.7.8) provides more detail on the methodology for estimating accommodation stock.

- 7.335 The specific districts in which off-site visitors choose to stay is assumed to be driven by two key decisions: the attractiveness of the location, and the distance from the theme park. The number of hotels in the district is used as a proxy for the attractiveness of the location. The number of people wanting to stay in a district is assumed to decay exponentially with the driving distance from the destination. In other words, the demand for staying in a place falls at an increasing rate the further away it is from the Project Site.
- 7.336 The model then estimates the resulting broad hotel distribution. The available stock in Dartford, Gravesham and Thurrock was found to be insufficient to fulfil the expected demand. Any demand that exceeds the available supply of hotel rooms is reallocated to hotels in the wider area based on the derived split of preferences for staying in the remaining areas.
- 7.337 The model finds that on the average day, there would be demand for approximately 270 rooms in 2025 off-site in the CSA, increasing to nearer 1,000 in 2038. Compared to the baseline numbers of existing stock shown in Table 7.27, the extra demand is high: the table shows that there are approximately 2,800 rooms in the CSA so the extra demand would make up a large proportion of this. This exercise distributes demand based on visitor preferences. This means that the London Resort hotels are not necessarily booked at all times.
- 7.338 This exercise concludes that there is likely to be excess demand for hotel rooms in the CSA as a result of the London Resort. This demand could be met through several routes including development of new housing, hotels and other accommodation in the area. Serviced and non-serviced accommodation in other areas would also be expected to meet some of this demand and may innovate by potentially offering coordinated transport shuttles to the Resort and overnight package deals. However, given the magnitude of impact, a reasonable worst case assumption is that there is some additional development in the area, but not enough to offset the additional demand created, particularly at a few points in time as development planning can lag market trends. In this scenario, London Resort would put pressure on the visitor accommodation market in the CSA, which could increase prices and displace other visitors to the area. This aligns with conclusions from bodies such as Visit Kent and Locate in Kent. Recent research carried out for them showed unmet demand for hotel accommodation in certain parts of Kent and Medway.
- 7.339 In this reasonable worst case scenario, the additional demand would likely result in housing pressures as the number of short term lets increase. There are existing issues with affordability in the CSA which are affecting residents' ability to afford housing in the area. The increase in short term lettings would put additional upward pressure on prices and magnify these issues. The implication of these changes upon the changing character of the community are assessed in Chapter 8: *Human health* (document reference 6.1.8).
- 7.340 At the same time, these changes would have positive implications for owners of the

existing hotels and would increase the viability of development in the area. The future baseline considers the likely increase in hotel floorspace at planned developments in the study area. The exact planned number of rooms and timescales for delivery is uncertain, but the impact of the London Resort on the deliverability and viability of those future baseline proposals is likely to be significant and positive. Any price increase would also have beneficial impacts for homeowners in the area who are a majority (68%) of households.

- 7.341 Overall, it is expected that there will be some development of new housing, hotels and other accommodation associated with the increase in viability as a result of the London Resort. But, in order to provide a reasonable worst-case assessment of the impact of the London Resort, it is assumed that the development does not fully respond to meet the increased demand and there are pressures on the accommodation and housing market through the mechanisms discussed above.
- 7.342 London Resort will contain on-site hotels. For the purposes of this assessment, these are assumed to be built as follows: 2,300 rooms or 'keys' in 2024/2025 (opening year 2024, first full year 2025) and a further 1,250 keys in 2029/2030. The baseline assessment identified that the CSA currently has 4,800 bed spaces in hotels, which are contained in 2,100 hotel rooms across the CSA. The London Resort will therefore increase the stock of hotel rooms by over 100% in 2024 and over 150% in 2029. This embedded mitigation is accounted for in the assessment of this effect.

Workers

- 7.343 This part of the assessment considers the effects that the additional employment resulting from the London Resort could have on the supply and demand for housing across the CSA, compared to the future baseline position of growth without the London Resort.
- 7.344 As shown in Table 7.34, the London Resort is expected to support 8,700 gross direct jobs in 2025, 12,900 in 2030 and 17,200 in 2038. This jobs growth might place additional demand on the housing market, which would occur indirectly through increased migration into the area resulting from it being a more attractive place to live. Forecasts of objectively assessed need for local authorities consider the relationship between job growth and population growth. These tend to rely on several factors, including the level of unemployment and economic activity in the area and commuting patterns. All of these could reduce the housing requirement, as explained below.
- *Unemployment:* if there are high unemployment rates, it is likely that a greater proportion of these jobs will be taken by local residents, reducing the need for in-migration and the resulting housing demand.
 - *Economic activity:* similarly, any increases in economic activity (older people staying in the labour market for longer, for example), increase the pool of labour reducing the need for in-migration.

- *Commuting rate*: reducing the level of out-commuting would reduce housing demand as the economy grows.
- *Double jobbing*: increasing the number of local people who have two jobs would reduce the requirement for housing.

- 7.345 The 2016 GBC Strategic Housing Market Assessment considered the impact of jobs growth on housing projections. It considered several scenarios, a couple of which assess the impact of emerging proposals for the London Resort on housing requirements. These scenarios are based on Resort job estimates that were higher than now projected so the requirement for homes was higher – but this provides an indication of the potential impact of workers on the housing market. The modelling found that if the London Resort was delivered, housing delivery would need to increase by 22% above the long-term migration scenario. However, in another scenario where economic activity increases, this figure falls to 6.5%.
- 7.346 These scenarios are based on several assumptions about the level of unemployment, economic activity, out-commuting and double jobbing. There is significant uncertainty involved in these. For example, the study assumes that the level of out-commuting in Gravesham remains the same as existing levels. As the study states, this does not align with the borough’s intention to reduce out-commuting. Indeed, proportions of residents commuting out of the CSA for job opportunities, particularly to London, has been raised by stakeholders, and the desire to draw back some of this workforce. As noted, these are also based on outdated and inflated estimates of the workforce of the London Resort and so overestimate the requirement for additional housing.
- 7.347 That said, these projections suggest that there is likely to be additional housing demand supported in the CSA as a result of the workers of the London Resort. The London Resort is providing embedded mitigation in the form of 500 units on site. Chapter 3: *Project description* (document reference 6.1.3) states that *‘the housing would be for staff working in the Entertainment Resort, including full-time and seasonal employees.... This is intended to allow for smooth operation of the Resort, assist recruitment, reduce the need to commute and reduce pressure on local housing rental markets and local transport networks’*. The units could accommodate up to 2,000 workers. This will mitigate this impact to some extent.
- 7.348 The evidence indicates that the workers would place additional pressure on local housing markets. The overall impact of the workers on the study area will depend on the extent to which the additional demand is greater than the additional supply for up to 2,000 workers and the market response.¹⁵⁰ It is not possible to estimate the additional demand with any certainty. It will depend on factors outlined in this section, many of which are indicating that the housing requirement will be reduced – relatively high and increasing levels of unemployment and economic activity and a desire to reduce the level of out-commuting. That said, longer term predictions are difficult and made trickier by trends

¹⁵⁰ Benchmark schemes (i.e. other major theme parks and resorts) do not provide data to inform the detail of such dynamic impacts.

in the labour market (e.g. flexible working) and the impact of COVID-19. Given this uncertainty, a conservative assessment is that the workers will place additional demand over and above the on-site provision.

Effects on housing: conclusions

- 7.349 The effect of the visitors and workers on the accommodation and housing stock is assessed on four receptors in the CSA: residents, homes, businesses and visitors. These are all determined to be of medium sensitivity.
- 7.350 The impact of the demand created by the workers and visitors at the London Resort could have negative implications for residents and homes through the pressures placed on the housing market. The impact on residents and homes across the CSA would be mitigated to a large extent through embedded mitigation in the form of capacity for 2,000 staff living onsite and 3,550 hotel rooms by 2038. However, the analysis above suggests that this mitigation may not be sufficient and there would be some additional demand placed on the housing market of the CSA. In the end, the final outcome depends on the development response – the number of additional homes, hotels and other accommodation that will be built. The London Resort will make development much more viable in the area, which has been demonstrated by the experience near Disneyland Paris.¹⁵¹ As an example, Ebbsfleet Garden City will be expected to provide much more housing compared to the counterfactual where the London Resort is not delivered due to the additional demand created in the area and associated impacts on viability.
- 7.351 This assessment takes a reasonable worst case approach and assumes that there would be a development response but due to land and development constraints it may not be sufficient to offset all of the additional demand. Under this scenario, demand is expected to exceed supply and house prices and rents would increase. This would be a beneficial impact for some residents as it would enable them to make money through tourism opportunities, such as renting out their home or spare rooms. It would also be beneficial for homeowners who would see their house prices increase. However, there would also be negative impacts for renters and people wanting to buy in or move into the area. There would be many beneficiaries as the majority (68%) of housing in the CSA is owner occupied. However, to provide a conservative assessment, the impact is described as potentially adverse.
- 7.352 The impact on existing visitors to the area could also be slightly adverse for similar reasons as the residents and homes. Increasing prices and competition for accommodation options could have some minimal adverse impacts on availability of accommodation and therefore visitors to nearby attractions. However, any impact on visitors is likely to be infrequent and fairly minor in the context of their overall spend.
- 7.353 For businesses, the impact is positive. Hotels will be made more attractive, profitable and viable and many other businesses will gain from the associated economic activity.

¹⁵¹ Disneyland Paris, 25 Years of Economic and Social Contribution.

- 7.354 Based on this reasonable worst case assessment, the magnitude of impact on residents and homes is anticipated to be negligible in 2025, and low in 2030 and 2038. This results in a **minor adverse** effect in 2025 (**not significant**) and a **moderate adverse** effect in 2030 and 2038 (**significant**).
- 7.355 The magnitude of impact on visitors is anticipated to be negligible in all assessment years. This results in a **minor adverse** effect in 2025, 2030 and 2038 (**not significant**).
- 7.356 The magnitude of impact on businesses is anticipated to be negligible in 2025 and low in 2030 and 2038. This higher magnitude of impact reflects the fact that by 2030 businesses will have had more opportunity to take advantage of the increased demand for overnight stays in the area, and to adapt their businesses to benefit from this. This results in a **minor beneficial** effect in 2025 (**not significant**) and **moderate beneficial** effects in 2030 and 2038 (**significant**).

Potential effects of visitor and worker expenditure

- 7.357 The visitors who do not stay on-site at the London Resort will spend money on accommodation, food and retail/entertainment in the area near where they stay. Similarly, the London Resort's workforce would be expected to spend some of its income locally. The London Resort will provide 500 units for worker accommodation to be delivered in phases, with 250 to be built by Gate One. These are expected to be at 90% capacity. This equates to 900 workers living on-site in 2025 and 1,800 workers living on-site from 2029 who, as new residents to the area, will spend on consumer goods and services.
- 7.358 The spend impacts are assessed against future turnover baseline for key spend categories in Appendix 7.9: *Retail and Leisure Impact Assessment* (document reference 6.2.7.9). The assessment concludes that the effect of the visitors spend will be positive but, in the context of existing turnover in the study areas, negligible.
- 7.359 These estimates are deliberately conservative to provide a reasonable worst case assessment of the London Resort.
- 7.360 The magnitude of impact associated with the additional worker and visitor spend is expected to be negligible in 2025, 2030 and 2038 (high sensitivity receptor). This results in a permanent effect that is **minor beneficial (not significant)** at the CSA in 2025, 2030 and 2038.

Potential effect of workers and visitors on healthcare provision

- 7.361 The impact of London Resort upon demand for health services would result from workers (including those living onsite) and visitors. This section considers the effect of these on GP and A&E demand, as well as wider health and social care services, including mental health and acute services. Whilst these latter effects have not been quantitatively assessed in this chapter due to data unavailability, they are considered in the assessment of the magnitude of impact.

- 7.362 Appendix 7.4: *Non Significant Effects* (document reference 6.2.7.4) provides a more detailed assessment of the effect of the London Resort on healthcare provision. It is summarised below.
- 7.363 On-site resident workers are expected to result in demand for 0.5 (2025) and one (2030 and 2038) additional GP FTE. During consultation, the CCG did not view the indirect impact of offsite workers on GPs as a significant issue. Visitors are not expected to place an additional burden on primary care.
- 7.364 For A&E demand, maximum injuries were calculated for visitors to theme parks, workers (workplace accidents) and the on-site residential workers. Many of these injuries will be dealt with by the on-site medical facility and will not result in a trip to A&E.
- 7.365 The CCG agreed that the analysis outlined in this chapter is detailed and robust and agreed with the effect significance. Their key concern is limiting unnecessary A&E trips. It is acknowledged that some A&E trips will be necessary where there is a serious injury but any measures to reduce trips to A&E would be vital. The CCG noted that the onsite facility will help but suggested alternative solutions to minimise the impact on A&E services. Some potential options noted included working collaboratively with the EDC and video links to the A&E. The Applicant is committed to continued engagement with the CCG. Based on this commitment and the conclusions of the CCG and the analysis above, it is expected that the likely effect on A&E will be mitigated and immaterial.
- 7.366 The Security Planning Report outlines the ways in which the London Resort will mitigate against major incidents. The London Resort will contain a helipad for emergency use in the rare event of a major emergency incident.
- 7.367 Public service providers have a statutory duty to serve the public wherever they choose to live and work. Demand arising from new workers to the area should therefore, to some extent, be met by reallocation of resources. Most services are funded through central or local taxation and should therefore be able to respond and absorb additional demand when it arises. *The Economic and Regeneration Statement* (document reference 7.5) explains that the London Resort will generate significant tax revenue, which will help to increase resources at the locations where there is more demand, thereby largely offsetting the impact.
- 7.368 Overall, given the conclusions of the CCG, the commitment of the Applicant to ongoing collaborative working with the CCG, the statutory duty for public health providers to serve the health needs of the public, and the increase in tax base created by the London Resort, it is expected that the London Resort will have a negligible magnitude of impact upon healthcare (high sensitivity receptor) in all assessment years. This would result in a **minor adverse** effect (**not significant**) upon healthcare in 2025, 2030 and 2038.

Potential effect of workers and visitors on other public services

- 7.369 No public services infrastructure falls within the PSB, hence there is not expected to be any direct impact upon public services being diminished or displaced due to the London

Resort.

- 7.370 In terms of demand for education, visitors are not expected to generate any additional demand for education services. Additionally, the workers living on-site are not expected to bring any families with them and so are not expected to increase demand for education.
- 7.371 The additional workers and visitors may increase demand for emergency services within the CIA. This is partly covered by the healthcare effect above, which found a minimal additional demand for A&E services from both workers and residents.
- 7.372 The London Resort may also increase demand for fire, ambulance or police services. However, as discussed above in the context of health effects, any demand for public services is expected to be offset by the increased tax base supported by the London Resort. This adjustment will happen as providers are bound by their statutory duty to supply sufficient resources for their residents and workers. In this way, public services will respond to the changing population and absorb new demand.
- 7.373 The Security Planning Report outlines the ways in which the London Resort will mitigate against major incidents. During consultation, NHS England highlighted the prioritisation of access by all first responders (medics, fire rescue and police) which has been taken on board by the project team. All these measures aim to minimise the overall impact of the London Resort on these services, which will be well prepared to enact plans in the case of an emergency. The London Resort will contain a helipad for emergency use in the rare event of a major emergency incident.
- 7.374 Overall, the impact on public services is expected to be of negligible magnitude (medium sensitivity receptor) in all assessment years. which would result in a **negligible (not significant)** permanent effect in 2025, 2030 and 2038.

Potential effect on local retail and leisure, including town centres

- 7.375 The London Resort is expected to attract a large number of visitors, many of whom will spend on accommodation, retail and F&B in the CSA. There will also be a large number of workers who will all spend in the CSA. Finally, the London Resort will provide on-site accommodation for 900 workers in 2025 and 1,800 from 2029. It is expected that these will all spend on consumer goods and services in the CSA.
- 7.376 On the other hand, the spend opportunity at the London Resort has the potential to divert trade from other retail and leisure businesses, in the CSA and further afield. It is important to recognise that the offer at the London Resort will be completely new and different from anything that currently exists in the CSA. In this way, it is not anticipated to be a direct competitor and is not expected to result in trade diversion from existing businesses. As described in this chapter, it is far more likely that the spend would be additional. However, it is possible that CSA residents (and residents further afield) might, rather than spending in a CSA retail or leisure business, choose to instead spend at the London Resort. This could have a knock on effect for the long term viability of the existing

retail and leisure businesses in the CSA.

- 7.377 The effect on retail and leisure is summarised in this chapter and assessed in detail in Appendix 7.4: *Non Significant Effects* (document reference 6.2.7.4) and Appendix 7.9: *Retail and Leisure Impact Assessment* (document reference 6.2.7.9)
- 7.378 Overall, the retail and leisure offering at the London Resort is not expected to result in significant adverse impacts across any type of retail/leisure or centre in the CSA. The London Resort is a unique proposition which will be distinct from other local retail and leisure offers and is not expected to result in significant trade diversion. The Retail and Leisure Impact Assessment provides a conservative assessment of the London Resort on local retail and leisure and still finds that the effects are not significant.
- 7.379 These conclusions align with the North Kent SHENA¹⁵² which reports that health check assessments in Gravesham (and Medway) identify that many centres in Gravesham and Medway have a relatively limited commercial leisure offer at present, indicating that there is capacity for additional leisure. The report states that they would not expect the opening of the London Resort to dilute any demand for additional commercial leisure provision in the centres in Gravesham and Medway as the catchments and users of the destinations are likely to be different.
- 7.380 Additionally, the London Resort is expected to retain CSA resident spending which is additional or leaked out of the CSA. The interaction with the housing effect – described in Appendix 7.4: *Non Significant Effects* (document reference 6.2.7.4) – means that there is the potential for even greater spend benefits, but these have not been assessed as part of the worst case. Finally, the potential for linked trips and associated development has not been estimated here to be conservative but have the potential to increase benefits even further.
- 7.381 Taking all the above into account, it is conservatively deemed that the London Resort will have a negligible impact on retail and leisure centres in the CSA in all assessment years. On a high sensitivity receptor, this results in a **minor adverse** effect (**not significant**) in 2025, 2030 and 2038.

PROPOSED ADDITIONAL MITIGATION AND ENHANCEMENT

- 7.382 Additional mitigation and enhancement measures differ from embedded measures. Embedded measures are built into the scheme and reduce the negative impacts or enhance the positive aspects of the London Resort. The impact of these embedded measures is incorporated into the impact magnitude in the main assessment.
- 7.383 By contrast, additional mitigation measures are measures imposed outside the scheme itself to address the negative effects of the scheme. Additional enhancement measures are measures intended to improve the positive impact of the scheme. These measures

¹⁵² North Kent SHENA, Retail & Commercial Leisure Assessment, 2016

are not embedded in the main assessment of effects but are relevant nonetheless. Depending upon the additional measure, the effect in the main assessment can be revised to form a different, residual effect.

7.384 The table below summarises, for every additional mitigation or enhancement measure, the initial effect assessment and the residual effect based on the measure. Details of the measures are provided below the table.

Table 7.41 Residual effects given additional mitigation and enhancement measures

Effect	Main assessment	Additional mitigation / enhancement	Residual effect
Potential temporary effect of the construction workforce on crime levels	High sensitivity + low impact = moderate adverse (significant)	Mitigation Construction Method Statement (CMS)	The CMS measures are expected to reduce the likelihood that construction workers would commit crime in the study area. Minor adverse (not significant)
Temporary or permanent displacement / loss of businesses and other services	High sensitivity + high impact = major adverse (significant) For businesses and employees in the PSB.	Mitigation Property Compensation Policy Commitment to ongoing engagement with displaced businesses, and assistance for businesses with relocation options, including working with SELEP and Locate in Kent to understand available space.	It is expected that ongoing commitments to further mitigation will reduce the sensitivity of some businesses and / or reduce the magnitude of impact for some businesses. However given the existing sensitivity and lack of definitive mitigation at this stage the effects are still judged to be significant adverse. Moderate adverse (significant)
Potential temporary effect of employment on the labour market, skills and training	High sensitivity + medium impact = major beneficial (significant) in 2023 and 2028	Enhancement Appendix 7.7: <i>Outline Employment and Skills Strategy</i> (document reference 6.2.7.7)	The strategy has been designed with the specific intention of increasing the level of local employment and the skill levels of local residents. Major beneficial (significant) in 2023 and 2028
Potential effects of new employment on skills and training	Local jobs: medium sensitivity + low impact = minor beneficial (not significant) in 2025 and 2030; medium sensitivity + medium impact = moderate	Enhancement Appendix 7.7: <i>Outline Employment and Skills Strategy</i> (document reference 6.2.7.7)	The strategy has been designed with the specific intention of increasing the level of local employment and the skill levels of local residents. Local jobs:

Effect	Main assessment	Additional mitigation / enhancement	Residual effect
	<p>beneficial (significant) in 2038</p> <p>Skills and training: high sensitivity + low impact = moderate beneficial (significant) in 2025; high sensitivity + medium impact = major beneficial (significant) in 2030 and 2038</p>		<p>Moderate beneficial (significant) in 2025 and 2030; Major beneficial (significant) in 2038</p> <p>Skills and training: Major beneficial (significant) in all assessment years</p>

Construction Method Statement

7.385 The construction period will be managed in accordance with the highest standards to minimise any adverse impacts, such as crime. Appendix 3.1: *Outline Construction Method Statement* (document reference 6.2.3.1) outlines that:

- The Principal Contractor will ensure the roles and responsibilities of all named personnel and appropriate communication details and channels are clear and that clear project management procedures are in place for all aspects of the construction; and
- The Applicant will require that all construction personnel attend inductions including matters related to site rules, health and safety requirements, arrangements for first aid and emergency response, and environmental management.

7.386 Appendix 3.2: *Outline Construction and Environmental Management Plan* (document reference 6.2.3.2) describes the measures proposed to protect the environment and local amenity during construction, covering both land based and marine operations. Whilst the specifics of the plan are yet to be finalised, it is expected that the London Resort will adhere to at least the same standards as other, best practice DCO applications.^{153,154,155} This could include, but may not be limited to:

- Workers will be required to attend project induction sessions;
- Workers will be required to conform to the Worker Code of Conduct (the Code) (as described in Appendix 3.2: *Outline Construction and Environmental Management Plan* (document reference 6.2.3.2) – the CEMP is a certified document for the DCO), which

¹⁵³ Sizewell C, 2020, Community Safety Management Plan, Appendix 1.A.1 HPC Worker Code of Conduct

¹⁵⁴ Heathrow Airport Ltd, 2019, Draft Code of Construction Practice

¹⁵⁵ Wylfa, 2008, Workforce Management Strategy

sets out clear expectations for the behaviour of workers both on-site and when in the local community. The Code will be aligned with the project principles and values. The expectations may cover, but may not be limited to:

- No antisocial behaviour, discriminatory behaviour or harassment;
 - No offensive, abusive or derogatory language either in person or over media such as email or text;
 - No property damage of any kind;
 - Respect for local community facilities.
- The consequence for violating the Code may include intervening actions for minor offences. The London Resort can preclude the operative from working on the London Resort project. This may lead to job termination by the operative's employer, who will follow the statutory process of verbal, written warnings, final notices and subsequently loss of employment. This will be made clear to the workers and, by signing up to the Code, the workers acknowledge these consequences;
 - Supply chain partners and contractors will be required to comply with the Code. These bodies will be consulted in the development of the Code so that all agree on the scope and are aligned with behaviour expectation and are willing to enforce the Code with their workforce;
 - The Code is intended to supplement, but not replace, existing law and order provisions in place to protect members of the community and which all individuals are responsible for abiding by; and
 - The Code will be made publicly available so that the community is aware of the standards of behaviour expected, the consequences for violation, and the channels through which to engage with the project over workforce behaviour.

Property compensation policy

7.387 The property compensation policy seeks to financially mitigate the adverse impacts associated with displacement of homes, land or property as a result of land acquisition by the London Resort. The Applicant recognises that claimants may find it difficult to secure alternative accommodation both in the locality and also at a similar entry level (rent/value) and is therefore prepared to make an enhanced proposal to qualifying claimants – the London Resort Premium. The compensation seeks to cover:

- the value of the land taken (the open market value of the land regardless of the London Resort);
- any 'severance or injurious affection' (any proven reduction in open market land value retained if only part of the land is acquired);
- 'disturbance' (reflective of losses incurred due to being disturbed from occupation);

- reduction in open market land value despite no land being taken.

7.388 The enhanced compensation represents a significant addition to the National Compensation Code and for some businesses will provide them with the opportunity to relocate to better premises and expand their business.. However, it is not relied on to reduce the significance of the effect at this stage as it may not necessarily mitigate all adverse effects on all receptors. For example, it could reduce the effect on the owner of the business but not necessarily the employees. Alternatively, the owner may not be able to find an alternative site but with the enhanced compensation, adding 30% to their claim capped at £500,000, they are likely to invest at least part of the proceeds in other opportunities that arise in the area.

Displacement of businesses mitigation

7.389 The Applicant has been in consultation and engagement with landowners and onsite businesses for many years. The Applicant is exploring options for business relocation support in partnership with local stakeholders. To date as well as discussions with the landowners and businesses themselves, this has included discussions with local authorities, SELEP and Locate in Kent over what spaces might be available for the displaced businesses within Kent and Essex. Engagement with the businesses is ongoing and there will also be a generous financial compensation package (as described above).

7.390 The Applicant is committed to ensuring that any displaced businesses are appropriately supported throughout the process. All businesses identified within the PSB have been notified and received request for information (RFI) forms, asking questions about the ownership, rights to and use of the property/land, the business onsite, and tenancy information. The Applicant has been engaging for a number of years. These conversations have informed the backbone of the generous property compensation offer. More recently, the approach has been to focus on engagement with individuals, including webinars for these businesses during the statutory consultation. Sessions will continue in the coming months when more is known about the requirements of specific businesses, so that the offer can be tailored to suit the displaced businesses as far as possible.

7.391 This engagement is ongoing and will continue after DCO submission because firms' priorities and land requirement needs will change over time. Meaningful concrete strategies are hard to develop further than financial compensation at this stage before certainty exists on the timing of land requirements and thus the displacement of businesses. Relocation assistance will be provided to mitigate the effects of relocating. The precise details of this will continue to evolve as more is known about timings and business and land requirements. It would be premature to do this now given uncertainties and changing needs. The Applicant is committed to ensuring that the support offered is suited to the needs of the businesses at the time of the displacement. This may involve assistance in engaging with local authorities and/or SELEP and Locate In Kent in order to identify potential sites, or assisting in providing more time or temporary

relocations for businesses most at risk.

- 7.392 At this stage given the lack of detailed profiling of need and precise timing of relocation for each individual business, a definitive mitigation strategy for each and every business has not yet been devised. Given the evolving nature of the discussions, the extent to which it would mitigate adverse effects is currently unclear, however the Applicant is committed to this ongoing communication and to providing appropriate assistance to displaced businesses.
- 7.393 The support will mitigate some of the adverse displacement impacts. For some businesses this mitigation could result in them becoming less sensitive to relocation, and for others the magnitude of impact of relocation could be lessened due to support being provided.

Employment and Skills Strategy

- 7.394 Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7) provides detailed information on the pledges the Applicant is committed to and how they would be implemented. These pledges have been designed with the specific intention of increasing the level of local employment and the skill levels of local residents. The pledges are designed to address the key issues and priorities in the area, thereby maximising local benefits. This strategy is submitted in draft with the DCO and will be an evolving document. Specifically the methods of implementation for this strategy will continue to evolve following continued collaborative engagement with the Employment and Skills Taskforce.

Monitoring Plan

- 7.395 The senior management team at the London Resort would continually monitor aspects that are important to the receptors by reporting on key issues, such as the selection and recruitment process, the workplace culture and safety and security. The plan would also consider whether there are unforeseen or unintended consequences for the local area and ensure that they are mitigated. For example, it would monitor uncertain aspects, such as COVID-19, to ensure that any adverse impacts are mitigated.

RESIDUAL EFFECTS

- 7.396 The residual socio-economic effects are summarised in the table below. Significant effects are in bold. Where the assessment year is not stated, the sensitivity, magnitude of impact and effect significance are the same in all assessment years.

Table 7.42 London Resort: summary of residual socio-economic effects

Effect	Receptor	Spatial scale	Sensitivity	Impact	Residual effect
CONSTRUCTION EFFECTS					
Effect of employment generation and effects on businesses in the supply chain	Residents	LCA	Medium	Low	Minor beneficial
	Businesses	National	Low	Negligible	Negligible
Effect of employment on the labour market, skills and training	Residents; Employment, skills and training providers (local jobs and skills)	CSA	High	Medium	Major beneficial
Temporary effect on crime levels	Residents	CSA	High	Low	Minor adverse (post-mitigation)
Temporary effect on local healthcare	Residents	CIA	High	Negligible	Minor adverse
Temporary effect of employment generation on the temporary accommodation market	Homes; Residents	CSA	Medium	Low	Minor adverse
Temporary or permanent displacement / loss of businesses and other services	Businesses; Workers	PSB	High	High	Moderate adverse
	Businesses; Residents	CSA	Medium	Low	Minor adverse
Temporary or permanent displacement / loss of community uses (split by community use)	Community facilities	PSB (direct impacts)	Low	Low	Negligible
	PRoWs and routes		Low to medium	Low to high	Minor adverse to moderate beneficial (construction). Two moderate beneficial (operational)
	Open spaces (marshes)		Low to medium	Negligible to high	Three moderate beneficial (operational)

Effect	Receptor	Spatial scale	Sensitivity	Impact	Residual effect
Displacement of residential dwellings as a result of property acquisition	Residents and homes	Dartford	High	Negligible	Minor adverse
Temporary or permanent disruption to housing delivery as a result of the land take and construction works	Residents and homes	Dartford	High	Negligible	Minor adverse
OPERATIONAL EFFECTS					
Employment generation (including indirect and induced effects)	Businesses	CSA	Medium	Medium (2025), high (2030, 2038)	Moderate beneficial (2025), Major beneficial (2030, 2038)
		LCA	Low	Low	Negligible
		National	Low		
Effect of new employment on skills and training	Residents (local jobs)	CSA	Medium	Low (2025 and 2030), medium (2038)	Moderate beneficial (2025, 2030), Major beneficial (2038). (after enhancement)
	Employment, skills and training providers (skills)		High	Low (2025), medium (2030, 2038)	Major beneficial (after enhancement)
Effects of trade creation and diversion relating to theme parks	Businesses	National (trade creation)	High	High (2025, 2030),	Major beneficial
		RCA (trade diversion)	Medium	Low (2025, 2030),	Minor adverse (2025, 2030), negligible (2038)

Effect	Receptor	Spatial scale	Sensitivity	Impact	Residual effect
				negligible (2038)	
Effects of visitors and workers on local accommodation options and the housing market	Residents; Homes	CSA	High	Negligible (2025), low (2030, 2038)	Minor adverse (2025), moderate adverse (2030, 2038)
	Businesses			Negligible (2025), low (2030, 2038)	Minor beneficial (2025), moderate beneficial (2030, 2038)
	Visitors			Negligible (2025, 2030, 2038)	Minor adverse (2025, 2030, 2038)
Effects of visitor and worker expenditure	Businesses	CSA	High	Negligible (2025, 2030 and 2038)	Minor beneficial
Effect of workers and visitors on healthcare provision	Residents	CIA	High	Negligible (2025, 2030, 2038)	Minor adverse
Effect of workers and visitors on other public services	Residents	CIA	Medium	Negligible (2025, 2030, 2038)	Minor adverse
Effect on local retail and leisure, including town centres	Businesses	CSA	High	Negligible (2025, 2030 and 2038)	Minor adverse

CUMULATIVE AND IN-COMBINATION EFFECTS

- 7.397 This assessment presents future projections of baseline conditions, including population and employment. Therefore, as the assessment takes into account changes in baseline conditions over time, changes to the population and employment occurring as a result of potential new developments are implicitly included within the assessment. As the assessment takes account of trends over time (for each of the core assessment years), changes to population and employment occurring as a result of potential new developments are implicitly assessed within the model and the assessment with respect to these indicators is inherently cumulative.
- 7.398 This approach does not, however, capture the future baseline for all socio-economic elements, such as construction workers or changes in public services, because projections are not available for these aspects. To account for this, identified contributions toward and changes to these socio-economic conditions are established through a review of future developments where relevant and if the development has the potential to result in significant environmental impacts. Appendix 7.2: *Detailed Methodology* (document reference 6.2.7.2) provides more detail on how cumulative effects are considered for each effect.

CLIMATE CHANGE

- 7.399 In the context of socio-economics, it is believed that climate factors have little influence on most baseline conditions. Potentially vulnerable receptors include existing and future residents who use local healthcare.
- 7.400 Under a moderate climate change scenario, it is expected that the health of the general population might be adversely affected by increased risk of overheating and other heat-related illnesses, drought, and decreased water and food security. This is partially offset against a reduced risk of cold-weather related illness in the winter, particularly in vulnerable groups such as the elderly.
- 7.401 It is concluded that climate change would have little effect on the socio-economic baseline. The London Resort has been designed to minimise the exposure of the resident, worker and visitor population to health-related issues which could be accentuated by climate change. Therefore, whilst the baseline sensitivity might rise slightly at a general population level, it is not envisaged that the specific impact of the London Resort would be adversely affected, and therefore the impact of climate change upon the scale of impacts is judged to be negligible.

SUMMARY AND CONCLUSIONS

- 7.402 This socio-economic assessment finds that the London Resort generates the following significant residual socio-economic effects:

- *Effect on the provision of construction skills* – **major beneficial** effect due to the increase in skills during the construction phase in 2023 and 2028;
- *Effect of displacement of businesses* – the London Resort is continuing engagement with businesses in order to ensure that their support will best meet the changing needs of the displaced firms. It is expected that ongoing commitments to further mitigation will reduce the sensitivity of some businesses and / or reduce the magnitude of impact for some businesses. However given the existing sensitivity and lack of definitive mitigation at this stage the effects are still judged to be significant adverse. Given this, it is concluded in the worst case that there is a **moderate adverse** effect in 2022 at the PSB level for both businesses and residents as a direct result of the displacement. At the CSA level (where the receptors are the businesses, their supply chains and residents who use them), the impact is minor adverse (not significant);
- *Effect on community uses* – of the 10 PROWs and routes directly affected, this assessment has concluded that there would be one **moderate beneficial** effect significant effects on DS1 and **moderate beneficial** effects on two of those routes with no PROW or official status (the network of pathways through Botany Marsh and the existing track at the top of Swanscombe Peninsula). There is also expected to be three **moderate beneficial** effects on open spaces due to the proposed improvements to the Marshes;
- *Effect of the operational employment* – **moderate beneficial** effect in 2025 and **major beneficial** effects in 2030 and 2038 to workers at the CSA level as a result of the direct employment opportunities created by the London Resort;
- *Operational effect on local jobs* – **moderate beneficial** effects in 2025 and 2030 and **major beneficial** effect in 2038 associated with the jobs taken up by residents of the CSA;
- *Operational effect of skills* – **major beneficial** effects in all assessment years associated with the uplift in skills as a result of the London Resort and the commitments contained within Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7).
- *Effect of trade creation and diversion relating to theme parks* – **major beneficial** effects in all assessment years at the national level as a result of the provision of a unique, global resort in the UK; and
- *Operational effect on the accommodation market* – **moderate adverse** effect in 2030 and 2038 on residents and homes due to the impact of the London Resort on the accommodation and housing market. **Moderate beneficial** (2030 and 2038) effects for businesses due to the additional demand created.