



# The London Resort Development Consent Order

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## Environmental Statement Volume 2: Appendices

### Appendix 4.1 – Assessment reports for the eleven site options considered by LRCH prior to the selection of Swanscombe Peninsula

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## Environmental Statement Appendix 4.1

### London Resort DCO document reference 6.2.4.1

# Assessment reports for the eleven site options considered by LRCH prior to the selection of Swanscombe Peninsula

This appendix provides an account of site options assessments undertaken by LRCH in 2011-12 and reviewed in 2017

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### Option 1: North Northamptonshire

Criterion	Summary
Description	<p>This is a broad area of search focusing on the north-eastern half of the county, between Northampton and Corby and including Kettering and Wellingborough. The area has a gently undulating topography conducive to resort development, substantial population centres from which a resort workforce might be drawn, and is served by several strategic north-south rail and road routes.</p>
Land availability	<p>Corby, Kettering and Wellingborough have all lost some of their traditional industries since the 1980s. However, brownfield sites of sufficient size for an entertainment resort were only identified in Corby; specifically, large former mineral workings at Priors Hall Park and Weldon Park and the Rockingham Motor Speedway on the north-east side of the town. Research confirmed that the Priors Hall Park and Weldon Park site has outline planning permission for a strategic urban extension, and some development has taken place. Another option is the Rockingham Motor Speedway motor sports circuit, also on the north-eastern edge of Corby. This site has received substantial investment for motor sports and is at the heart of a designated enterprise area. Neither site was considered to be available for an entertainment resort.</p> <p>Aside from these sites at north-east Corby, areas of brownfield land on the scale required for the resort were not identified, suggesting that North Northamptonshire was most likely to yield greenfield sites in open countryside.</p>
Land use	<p>The balance of farming in this area is towards arable farming, with good quality agricultural soils and an open landscape. Loss of productive farmland would thus be a concern. The area has several closed military airfields but these have generally in the course of redevelopment or have been returned to agriculture.</p>
Proximity to and connectivity with London	<p>Of the options considered, this is the most remote from central London at a distance of at least 110 km. North-south railway connections are available from the stations in Northampton, Corby, Kettering and Wellingborough, although none of these stations is on the east or west coast</p>

	<p>main lines, and the proposed HS2 line between London and Birmingham will pass 30 km to the south-west, passing mid-way between Northampton and Oxford.</p> <p>Bedford station, 25 km to the south-east, offers fast rail services to London St Pancras and thus to the Channel Tunnel rail link, and onwards to Gatwick Airport. Strategic road connections from London include the M1, A6 and A14.</p>
Transport and accessibility	<p>Of the areas of search considered, this is closest to the main urban centres in the Midlands and north of England and their airports. It is remote from the channel ferry ports but lies on the A14 route from Harwich and Felixstowe.</p> <p>Only Northampton at the southern end of the area of search has convenient motorway connections. The other main towns in the area of search are progressively more remote from motorways, with Corby being served predominantly by single-carriageway routes.</p>
Environmental constraints	<p>At a strategic level the area is free of environmental constraints such as national landscape designations (AONB, national park). However, outside the main towns the landscape comprises a patchwork of villages and farms with a strong rural character, frequently with protective heritage designations (listed buildings, conservation areas, scheduled monuments), ancient woodlands and nature conservation designations.</p>
Planning constraints	<p>Planning provisions for the major brownfield sites on the edge of Corby are described above. Otherwise, areas outside the main urban areas are subject to countryside protection policies that seek to maintain the established rural character and do not anticipate development on the scale of an entertainment resort.</p>
Regeneration and economic benefit	<p>An international entertainment resort development has the potential to bring economic transformation wherever it occurs. Other than Northampton and possibly Corby, the North Northamptonshire area of search was found to lack urban areas of sufficient size to provide a construction and operation workforce of the scale required without creating the potential for stress in local employment and housing markets.</p>
Observations	<p>The area of search has received considerable planned growth</p>

	<p>over the last 50 years, leaving few brownfield site options. The most notable opportunities are sites on the edge of Corby, but these are subject to partly-implemented plans for comprehensive development. For the purpose of the current project, Corby was also found to be constrained by communications (single-carriageway roads from most directions and a secondary rail service) and its remoteness from London (143 km).</p> <p>Otherwise, the area of search can only provide greenfield or substantially greenfield site options that are likely to be problematic in planning and environmental terms and difficult to service in terms of transport, employment and housing supply.</p>
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### Option 2: Marston Vale

Criterion	Commentary
Description	This is a more focused area of search along the A421 corridor between Bedford and the M1 motorway. Aside from its strategic road and rail connections (see below), an attraction of the area is the presence of several large quarries associated with the brick-making industry.
Land availability	Several worked out clay pits were identified, although many are substantially flooded and would require a comprehensive drainage strategy. A further area of opportunity is the former Elstow military storage depot at Wixams, close to the southern edge of Bedford.
Land use	<p>As noted, the clay pits are either fully or substantially flooded in the current disused state. Some have been developed for recreational use, including Stewartby Lake and the Marston Vale Millennium Country Park, and are thus unavailable. Other clay pits remain in various states of inundation.</p> <p>The former Elstow military storage depot at Wixams is being redeveloped as a new settlement for a population of 15,000-20,000 and is likewise considered to be unavailable for resort use.</p>
Proximity to and connectivity	The area of search lies between Bedford station, which offers

<p>with London</p>	<p>fast rail services to London St Pancras and thus to the Channel Tunnel rail link, and onwards to Gatwick Airport, and Milton Keynes station, which offers regular direct services to London Euston. East Croydon and Birmingham New Street. Neither Bedford nor Milton Keynes stations are on the HS2 route, which passes c.30 km to the south-west of Marston Vale. They would both be perhaps 10 km from a resort in the Vale, requiring a large passenger shuttle operation, partly through busy urban areas, to transfer visitors between the stations and the resort.</p> <p>Strategic road connections from London include the M1, A6 and A5. Marston Vale is 91 km from central London by road.</p>
<p>Transport and accessibility</p>	<p>There are minor stations at regular intervals on a branch line that runs through Marston Vale between Bedford and Milton Keynes. This line is due for upgrade as a part of proposals to provide improved transport links on the Cambridge – Milton Keynes – Oxford corridor. A new railway station is proposed at Wixams to serve the new settlement.</p> <p>The A421 road that passes between Bedford and the M1 motorway is dualled throughout.</p> <p>London Luton Airport, which offers a reasonably wide range of flights from continental Europe, lies 30 km to the south of Marston Vale.</p>
<p>Environmental constraints</p>	<p>The presence of lakes is indicative of the challenge of ensuring adequate drainage and flood protection in former quarries. Some of these lakes are identified as local nature reserves and the wider area to the south-west of Bedford is identified as the Marston Forest.</p> <p>Marston Thrift SSSI and LNR is a bird reserve in decision woodland between Marston Vale and Cranfield to the north-west.</p> <p>Local settlements include listed buildings and conservation areas.</p>
<p>Planning constraints</p>	<p>Milton Keynes and South Midlands sub-regional strategic growth area, with Wootton, Stewartby and Wixams all designated as growth area key service centres.</p> <p>Much of Marston Vale has been designated for a new</p>

	<p>community forest. The Forest of Marston Vale was announced in 2000 and is managed by a trust. The Marston Vale Millennium Country Park and the Stewartby Lakes development are early phases of this initiative.</p>
Regeneration and economic benefit	<p>The Bedford area including Wixens and Milton Keynes to the west of Marston Vale are identified for considerable growth. Since the site selection exercise for an entertainment resort was undertaken, the area has been included in the Cambridge – Milton Keynes – Oxford corridor for which the National Infrastructure Commission has prepared a strategy.</p> <p>The area has a large workforce and a construction sector geared to delivering development at the neighbourhood scale in Milton Keynes. However, unemployment in these expanding settlements tends to stay relatively low at most stages of the economic cycle and local recruitment for the resort might prove challenging.</p>
Observations	<p>Challenges facing a resort development in Marston Vale include the difficulty of finding a site with suitable ground conditions and good drainage, the need for relatively long visitor transfer arrangements between Bedford and Milton Keynes stations, whether by rail or road and the existence of well-developed plans for the major brownfield sites, including a new settlement at Wixens and the Forest of Marston Vale.</p>

### 3. Luton and Dunstable

Criterion	Commentary
Description	<p>Luton and Dunstable form a substantial urban area with good rail and motorway connections to London and an international airport. Economic regeneration is a priority for the town and the investment, employment and training opportunities that the entertainment resort would bring would complement local initiatives.</p>
Land availability	<p>Luton and Dunstable are densely developed with no suitable brownfield sites of sufficient scale. The largest vacant site identified is Marl Lakes, a former chalk pit west of Houghton Regis on the north-western edge of Dunstable. However, the</p>



	<p>site has an undulating terrain, is notified as a SSSI and is surrounded on three sides by housing and a school. Kensworth Quarry, another chalk pit on the southern edge of Dunstable, is also an SSSI.</p> <p>This led to the conclusion that the only available options for an entertainment resort would be greenfield sites, at which substantial planning and environmental constraints would apply (see below). Furthermore, much of the landscape around the towns is hilly and unsuited to resort development.</p>
Land use	<p>The existing pattern of land use does not assist the identification of a resort site. Luton and Dunstable are tightly developed with a clear urban edge and no suitable brownfield sites. Farmland in the surrounding rural areas is in productive arable use with good quality soils.</p>
Proximity to and connectivity with London	<p>Luton is 55 km from central London. The town offers frequent rail services to St Pancras with a journey time of 23-36 minutes. Whereas the main station is in Luton town centre, options for resort visitor transfer would include Luton Airport Parkway station on the town's southern edge.</p> <p>The M1 motorway runs along the south-western edge of Luton. Other than the M1, the road network serving Luton and Dunstable largely comprises single-carriageway roads that connect to the centres of neighbouring towns.</p>
Transport and accessibility	<p>The railway connection to Luton from St Pancras provides a direct connection to Eurostar services and the proximity of London Luton airport has already been noted.</p> <p>The junction between the M1 and M25 motorways is 25 km to the south of Luton. Other than the M1, strategic road connections to the Luton area are relatively poor.</p>
Environmental constraints	<p>The urban area sits astride of the Chilterns AONB, and landscapes to the south-east and north-west have complementary protection through planning policy.</p> <p>The principal brownfield sites in the area – the Marl Lakes and Kenworth Quarry chalk pits – are both notified as SSSIs.</p>
Planning constraints	<p>Luton and Dunstable are surrounded by the metropolitan green belt, which places a tight constraint on any development outside of the urban area.</p>

<p>Regeneration and economic benefit</p>	<p>The development of an entertainment resort would likely be of substantial benefit to the local economy, which has historically suffered from relatively high unemployment compared to surrounding parts of the south-east. The resort’s employment and training requirements would align with various objectives of Luton’s Skills and Employability Strategy 2012 and could provide a substantial boost for local supply chains.</p>
<p>Observations</p>	<p>The ability to provide transformative economic benefits in an under-performing area is a substantial attraction. However, no suitable unconstrained sites for an entertainment resort were identified due to a combination of terrain and a preponderance of national-level planning and environmental constraints.</p>

**Option 4: M25 north corridor**

<p><b>Criterion</b></p>	<p><b>Commentary</b></p>
<p>Description</p>	<p>This area of search extends along the M25 motorway between junction 21 with the M1 and junction 26 at Waltham Abbey. It was acknowledged at the outset that the metropolitan green belt would place severe limits on the potential for an entertainment resort development.</p> <p>Two particular site options were examined in this area of search:</p> <p><i>Willows Farm Village (now known as Willows Activity Farm), adjacent to M25 junction 22.</i> This has been described as a farm theme park and comprises a petting zoo, rides and other activities on an agricultural theme. The site also features agricultural sheds and a sizeable car park. The area around the Willows Activity Farm largely comprises farmland and current and former mineral workings, including Willows Lakes that extends north from the sites. Tyttenhanger House, a seventeenth century grade I listed house now used for offices and a wedding venue, stands at the northern corner of the site. The site lies within a 186 km<sup>2</sup> area of Hertfordshire that was designated as the Watling Chase Community Forest in</p>

	<p>1991.</p> <p><i>Gunpowder Park, 2 km west of M25 junction 26.</i> This is a former Royal Ordnance site used for munitions testing. 103 ha in extent, it has been regenerated as a park for recreation, outdoor pursuits, arts and entertainment, with a range of fields, meadows, marshes, woodland and lakes. In its restored state the park is largely greenfield in character with minor visitor facilities at its north-eastern corner.</p>
Land availability	<p>Both options feature well-established uses. Whereas Willows Farm Village is a privately-run facility available to paying visitors, Gunpowder Park offers free access to the public and offers a recovering natural greenspace on the very edge of London. Conceptually, Willows Farm Village might be capable of being secured through a commercial agreement. In contrast, Gunpowder Park is regarded as a public asset and its loss would be contentious.</p>
Land use	<p>Existing land uses of the sites themselves are explained in the description above. In terms of their immediate surroundings, Gunpowder Park is hemmed in by the River Lee to the west and housing beyond to the river and to the north and south-east of the site. The main scope for expansion would be to the east beyond the A112, where fields and nurseries are found. Willows Farm Village would have fewer physical constraints to expansion, being surrounded largely by open fields and few residential properties.</p>
Proximity to and connectivity with London	<p>Both sites are c. 25 km from central London. For Willows Farm Village, the closest railways station is in St Albans, 5 km away, with regular services and a typical journey time of 20 minutes to St Pancras. St Pancras offers fast onward connections to international destinations.</p> <p>For Gunpowder Park there frequent train services from London Liverpool Street to Waltham Cross, 3 km from the park, with a journey time of half an hour.</p> <p>Both sites are adjacent to the M25 motorway and the connectivity it provides to radial roads from central London and to all of London’s airports.</p>
Transport and accessibility	<p>Being adjacent to a junction on the M25, Willows Farm Village has excellent road links. At a strategic level the same can be said of Gunpowder Park, although the 2 km road link</p>

	<p>from M25 junction 26 to the site is via the A121, a single carriageway route likely to require dualling to be able to handle resort traffic.</p>
<p>Environmental constraints</p>	<p>King George’s Reservoir, 0.5 km to the south of Gunpowder Park in the Lee Valley, is included in the Chingford Reservoirs SSSI. The site itself is free of statutory nature conservation designations but is of local value for wildlife habitat.</p> <p>Various munitions bunkers and blast walls have been retained in the park as features of local heritage interest.</p> <p>Willows Farm Village is free of statutory nature conservation or heritage designations. The closest SSSI is at Redwell Woods, c. 2.5 km to the south-east. The site includes areas of grades 1, 2 and 3a farmland.</p> <p>Tyttenhanger House, the seventeenth century house at the northern corner of the site, has open views southward towards Willows Farm Village. An entertainment resort would be likely to have a substantial effect on the setting of this grade I listed property. Woodland around Tyttenhanger House is identified by Hertsmeire District Council as a local wildlife site in view of its biodiversity value.</p>
<p>Planning constraints</p>	<p>As noted, both sites are in the metropolitan green belt.</p> <p>The Hertsmeire Development Plan Core Strategy adopted in 2013 identifies Willows Farm as a ‘gateway site’ to the Watling Chase Community Forest. The local authority is concerned to retain the rural character of the Farm.</p> <p>The draft Epping Forest Local Plan 2016 identifies Gunpowder Park as a key leisure asset in the Lee Valley Regional Park.</p>
<p>Regeneration and economic benefit</p>	<p>Neither site is in physical need of regeneration. Of the two, the Gunpowder Park option affords greater potential to bring transformative economic benefits to the local community, being close to neighbourhoods in Enfield and Hertfordshire with comparatively low levels of income and economic activity.</p>
<p>Observations</p>	<p>The review of these options gave LRCH a valuable appreciation of the challenge of finding a suitable site for an entertainment resort site close to London. In the absence of large uncommitted brownfield sites the search process</p>

	<p>focused on two sites already in leisure use. Neither site could be recommended for further assessment in view of environmental designations, green belt policy conflicts and the dominating effect a resort development would have on its immediate surroundings, which a grade I listed building at Willows Farm and residential neighbourhoods at Gunpowder Park.</p>

### Option 5: M11 corridor

Criterion	Commentary
Description	<p>This area of search comprises the corridor of land broadly between M11 junction 7 at Harlow and M11 junction 8 at Bishop's Stortford, a junction that also serves London Stansted airport. A particular attraction of the area was its location between Stansted and London and the presence of frequent express train connections between Stansted, Harlow and London Liverpool Street station.</p> <p>The corridor lies in the valley of the River Stort Navigation and features an open landscape of arable farming and parklands and, for a rural area, a relatively dense pattern of farms, historic halls, hamlets and villages. The small town of Sawbridgeworth lies at the centre of the corridor.</p>
Land availability	<p>No large brownfield sites were identified in the corridor, suggesting that a resort development could only take place in open farmland. The density of dispersed residential development amongst the farmland made site definition even more problematic and no suitable site was identified.</p> <p>The major towns of Harlow and Bishop's Stortford are planned settlements with clearly-defined edges and no underutilised urban fringe sites that would come into contention.</p> <p>North of Bishop's Stortford and the adjacent settlement of Stansted Mountfitchet, the landscape becomes more open and sparsely populated. An entertainment resort would be akin to a new settlement and would be impossible to conceal in the wider rural landscape.</p>

Land use	<p>Outside of urban settlements, land is used predominantly for agriculture or as parkland, of which Pishiobury Park south of Sawbridgeworth and Hallingbury Park south-east of Bishop’s Stortford are examples.</p> <p>No former industrial sites, mineral workings or waste sites of a size and location suitable for redevelopment were identified.</p>
Proximity to and connectivity with London	<p>Sawbridgeworth at the centre of this area of search is 51 km from central London, via the M11 motorway. Rail connections are excellent, with fast and frequent services between Stansted, Harlow and London Liverpool Street station, as noted.</p>
Transport and accessibility	<p>Junction 7 (Harlow) at the southern end of the area of search is only 7 km from the M25, and the A120 east-west route, which has seen substantial dualling in recent years, crosses the top of the area of search.</p> <p>Epping station on the London Underground’s Central Line lies close to the M11-M25 junction and could provide a further mode of travel to the resort from north-east London if a connecting bus service was provided.</p> <p>Stansted Airport lies at the northern end of the area of search.</p>
Environmental constraints	<p>Although largely rural in character, those parts of the area of search outside the main settlements has a relatively dense and intricate pattern of development, including several prominent listed buildings with the potential to give rise to concerns about the effects on setting. In contrast, the area of search is relatively free of nature conservation designations, with notified SSSIs limited to modest ponds and marshes between Sawbridgeworth and Little Hallingbury.</p>
Planning constraints	<p>The metropolitan green belt extends up the defined area of search and wraps around Bishop’s Stortford. Green belt policy tends to be implemented strictly in the area of search to prevent the urban coalescence of Harlow, Sawbridgeworth and Bishop’s Stortford.</p>
Regeneration and economic	<p>Amidst the general affluence of the Hertfordshire-Essex</p>

benefit	border, Harlow contains higher than average unemployment and features relatively highly on various indices of deprivation and low educational attainment. Resort development would support the ambition of the Harlow Economic Development Strategy to create 10,000 new jobs and would likewise be consistent with the Essex Economic Growth Strategy.
Observations	A strong case can be made for a M11 corridor location in transport terms and in terms of the benefits that could accrue for the economy of Harlow. However, no suitable site for an entertainment resort was identified in this area. Resort development would inevitably require a greenfield site in conflict with green belt and countryside protection policies.

### Option 6: Great Leighs racecourse, Essex

Criterion	Commentary
Description	<p>The attraction of this site at the time of the original site search in 2011-12 was its size, its established leisure use and the doubt that existed at the time over the future of the racecourse use. The site had been used historically as the Essex County Showground and a venue for open-air events. In 2008 it became Britain's first new racecourse, with marquees for stands. The racecourse soon experienced financial difficulties with the onset of the banking crisis and was forced to close. It was during this time that the site was considered by LRCH as a potential location for an entertainment resort. In February 2015 the racecourse reopened under the brand Chelmsford City, major new investment having secured its future. It is one of only three racecourses in the UK with floodlighting.</p> <p>The racecourse site lies to the west of the A131 dual carriageway in open landscape between Chelmsford and Braintree.</p>
Land availability	If land to the west of the racecourse that was opened for mineral extraction over the last 15 years is included, an area of c.80 ha would be available for resort development.

	With the racecourse having revived and mineral extraction continuing to the west, the land is no longer considered to be available.
Land use	The current use of the land as a racecourse and minerals site has been described. Land around the site is used for farming. Bushy Wood, a deciduous plantation, lies to the east of the site beyond the A131.
Proximity to and connectivity with London	The site is 82 km from central London, with road access via the A120 and M11 past London Stansted Airport or the A131 / A12 past Chelmsford and Brentwood. The nearest railway station, at Braintree, is on a branch line from Witham on the Ipswich to London line. Shuttle buses from Chelmsford station would provide a more direct means of transferring rail-borne visitors from London to the racecourse site, over a distance of c.11 km.
Transport and accessibility	<p>Rail connections have been described and the site is 18 km from London Stansted Airport with good road connections on the A120, which has recently been upgraded.</p> <p>The site lies alongside the A131 Chelmsford to Braintree road, which is dualled northbound to Braintree and thence to the A120 link to the M11 motorway, but reduces to a single carriageway in the direction of Chelmsford and the A12.</p> <p>The A12 provides a direct link to ferry services at Harwich and Felixstowe.</p>
Environmental constraints	The site itself is free of strategic environmental constraints and well separated from statutorily protected habitats. Local settlements contain some listed buildings.
Planning constraints	The site is outside the metropolitan green belt, which extends as far as the south-western edge of Chelmsford to the south. Being open and rural in character, local planning policies seek to restrain development. However, the racecourse site is one of several special policy areas in Chelmsford district that make allowance for the operational and functional requirements of the particular uses in question – in this case, a racecourse.
Regeneration and economic benefit	North-east Essex has a generally prosperous economy with low unemployment. Local settlements are generally modest



	in size and the employment demands of an entertainment resort would increase commuting and pressures on local housing markets.
Observations	<p>Although the site has a long history of leisure use and met the minimal size requirements for an entertainment resort, the presence of mineral workings, a racecourse and its open landscape setting on a farmland plateau, along with the limitations of local and strategic transport connections, all raise questions over the suitability of this site.</p> <p>LRCH examined the A12 corridor between Brentwood and Colchester more widely. A generic concern was the area's relatively marginal location and limited direct transport connections with the rest of the UK and the Continent.</p>

### Option 7: Southend-on-Sea and Canvey Island

Criterion	Commentary
Description	<p>Southend-on-Sea is a substantial seaside resort and has for long been a popular destination for day trips from London. Canvey Island lies to the south-west of Southend and offers beaches and resort amenities on a smaller scale. The two are separated by marshlands along Benfleet Creek.</p> <p>This was a general area of search selected without a particular site in mind. In addition to the established resort function of the locality, reasons for its inclusion in LRCH's review of sites included road connections via three dual carriageways – namely the A13 and A127 towards London and the M25 and the A130 towards Chelmsford and London Stansted Airport – and frequent train services to London. The rapid development of London Southend Airport for rail-linked passenger services was a further attraction.</p>
Land availability	<p>No single large brownfield site was identified within the established urban areas, suggesting that an entertainment resort would have to be accommodated outside of the towns.</p> <p>With land outside the established urban areas designated as green belt (see below), attention focused on identifying brownfield options. The only identified site of sufficient size</p>

	<p>is the Pitsea landfill site to the west of Canvey Island. This 275 ha site is operated by Veolia and is in the course of being restored, although licenced landfilling is likely to continue until c. 2025. The restored landfill will be managed by the RSPB for nature conservation, and Veolia has granted the RSPB a long term lease to develop a new nature reserve at Bowers Marsh on the northern edge of the landfill. Development on a capped landfill is inherently technically challenging. Local road access to the landfill is by means of a single C-road.</p> <p>Otherwise, the only identified options for a resort development would be on farmland or one of the area’s established golf courses. No suitable site was found.</p>
<p>Land use</p>	<p>For the reasons given above, no single suitable site was identified. The status of the Pitsea landfill site has been described and land around Southern and Canvey Island otherwise comprises good quality arable farmland on good soils, or golf courses.</p>
<p>Proximity to and connectivity with London</p>	<p>Southend is 70 km from central London and Canvey Island is 60 km distant.</p> <p>The area is served by train services from London Fenchurch Street and London Liverpool Street with a journey time of between 50-70 minutes.</p>
<p>Transport and accessibility</p>	<p>As noted the A13 and A127 provide good quality road links towards London and the M25. These routes are heavily used by commuters but resort traffic would arguably constitute a reverse-commute.</p> <p>The local road network otherwise generally comprises single-carriageway roads, suggesting a need for local network reinforcement to serve any resort site not served directly by the A13 and A127.</p> <p>London Stansted and London Southend Airports are both close to this area of search. Nonetheless, a general concern is that locations in east Essex are too marginal in respect of the rest of the UK and its principal international points of entry.</p>
<p>Environmental constraints</p>	<p>Coastal and estuarine environments are subject to a range of nature conservation constraints including SSSI, SPA, SAC and Ramsar designations.</p>

	No blanket environmental constraints are applicable in the agricultural hinterland around the towns, although protected historic assets and ancient woodlands might constrain development at the local level.
Planning constraints	At the strategic level the metropolitan green belt is drawn tightly to the boundaries of the urban areas and represents a significant development constraint. Southend-on-Sea Borough Council's local plan identifies several sites on the urban edge for development, but these are smaller than required for an entertainment resort and are allocated or partly implemented for local housing and employment demand.
Regeneration and economic benefit	Southend and Canvey Island suffer higher rates of unemployment and deprivation than surrounding parts of Essex or the national average. The inward investment, new employment, training opportunities, visitor influx and economic multiplier effects that an entertainment resort would bring have the potential to deliver substantial and permanent benefits to the local economy.
Observations	This area of search provides neither the large sites nor the transport connectivity with London, the rest of the UK and its international points of entry that would be required for the proposed entertainment resort. Coast and countryside are both tightly constrained by nature conservation and green belt designations respectively and the one large brownfield site – Pitsea landfill – was for reasons given found to be unsuitable.

### Option 8: Cliffe, north Kent

Criterion	Commentary
Description	<p>The area around Cliffe on the Hoo Peninsula was one of two options identified to test locations on the north Kent coast – the other being the Swanscombe Peninsula. Cliffe was selected because it offers large areas of level open land with direct rail access just outside the metropolitan green belt.</p> <p>The locality comprises good quality arable farmland in an</p>

	<p>open landscape which give way to reclaimed, intensively drained fields and marshes towards the River Thames to the north. To the west of Cliffe are large lagoons formed by chalk and gravel extraction, and mineral extraction and the manufacture of building products continue.</p> <p>Cliffe originated as a Saxon settlement and features a thirteenth century parish church. The village grew considerably during the second half of the twentieth century in a suburban pattern of housing development.</p> <p>In the wider area, the Medway Towns lie 6 km to the south of Cliffe and Gravesend is 9 km to the south-west.</p>
<p>Land availability</p>	<p>This option comprised an area of search without a focus on any individual site. Generically, sites close to the branch railway line that passes from west to east 2km to the south of Cliffe were of most interest because they would enable visitors to disembark directly into the resort. Such options would occupy farmland and would probably require the purchase of existing farmsteads.</p> <p>The lagoons to the west of Cliffe are up to 20 metres in depth and reclamation would not be feasible.</p>
<p>Land use</p>	<p>The locality comprises arable farmland and current and former mineral workings, interspersed by farmsteads, small clusters of dwellings and several large orchards. Mineral extraction dominates the land to the west of Cliffe.</p>
<p>Proximity to and connectivity with London</p>	<p>Cliffe is 57 km from central London. The closest railway station to the area of search is on the North Kent line 5 km to the south-west of Cliffe, from where train services operate into London Bridge and Charing Cross stations with a typical journey time of one hour. The branch line that passes closer to Cliffe is currently used for freight only but, as noted, has the potential for a new passenger station to serve an entertainment resort.</p> <p>Local highway connections are limited to rural C-grade roads with the exception of the B2000 that runs southward from Cliffe. This connects to the A289 dual carriageway that runs around the northern edge of the Medway towns and joins the M2/A2 route towards the M25 and London.</p>
<p>Transport and accessibility</p>	<p>Local transport connections are designed only to serve a</p>

	<p>modest rural population and would require a substantial upgrade to serve an entertainment resort.</p> <p>Even if a new railway station were opened near Cliffe on the Isle of Grain branch, it is doubtful whether the north Kent commuter line could accommodate the additional train movements.</p> <p>Land near Cliffe was mooted as a potential site for a new London airport in 2003. The option remained under review until recently but has not been pursued on account of cost, the proximity of extensive bird habitats and the relative remoteness of the site from London and the rest of the UK. These considerations would also apply in respect of an entertainment resort in this location.</p>
<p>Environmental constraints</p>	<p>Most of the area to the west, north and east of Cliffe lies in the North Kent Marshes Special Landscape Area, and extensive areas within this area are notified as SSSI, Ramsar and SPA sites in view of their nature conservation value – particularly for birds. Some areas of managed by the RSPB.</p> <p>Although the areas of most interest in the current contest – beside the railway to the south of Cliffe – are outside of these designated areas – parts of this corridor are in a tidal flood area.</p> <p>Heritage assets in the area of search include Cooling Castle in the village of Cooling, 1.5 km to the south-east of Cliffe. Now a Scheduled Monument, the castle is a fourteenth century structure with a stone keep surrounded by moats and ditches.</p>
<p>Planning constraints</p>	<p>The area of search lies outside the metropolitan green belt but is subject to local countryside protection policies. The landscape, ecology and flood constraints described above are more significant constraints to development.</p>
<p>Regeneration and economic benefit</p>	<p>Economic regeneration is a priority throughout the wider area of north Kent, which includes Dartford and Gravesend to the west and the Medway Towns to the south of Cliffe. With only a small population locally, the workforce for an entertainment resort near Cliffe is likely to be drawn from these towns, requiring significant improvements in rail, bus and road links.</p>

Observations	<p>The Cliffe area of search is considered to be too rural and remote to be considered a suitable location for an entertainment resort. Even if a suitable flood-free site could be found, the resort would require investment in transport infrastructure over an extended area to enable the smooth transfer of resort visitors and staff.</p> <p>Even then, the restricted capacity of the North Kent railway line is likely to pose a significant constraint.</p>
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### Option 9: Swanscombe Peninsula

Criterion	Commentary
Description	<p>This option comprises a large, largely brownfield site on the Swanscombe Peninsula in the south bank of the River Thames, between Dartford and Gravesend in north Kent. It comprises open, low-lying land with extensive evidence of past industrial and waste disposal activity associated principally with the cement industry, including chalk pits and deposits of cement kiln dust (CKD). A number of drains, lagoons and other features are also present. Much of the peninsula has re-vegetated naturally but areas of bare ground remain. Parts of the site comprise saltmarshes, although a flood defence embankment protects the site from inundation from the Thames. An inlet on the north-west side of the peninsula is used for the mooring and storage of boats.</p> <p>The High Speed 1 (HS1) railway crosses the peninsula on a south-east to north-westerly alignment. The southern section is in cutting and the remainder in a tunnel. The site also features high-level electricity transmission lines that cross the river.</p> <p>Surrounding areas are generally industrial in nature, including several industrial estates, although the recently-built Ingress Park residential neighbourhood borders the site to the west.</p>
Land availability	<p>A large area of largely brownfield land is potentially available to accommodate an entertainment resort. The land has been the subject of development proposals in the past, but nothing has come to fruition.</p>

Land use	The site is currently unused, other than for the boat moorings and a few communications installations towards the northern end of the peninsula. The land is used informally by walkers.
Proximity to and connectivity with London	<p>The site is approximately 30 km east-south-east of central London, and is only 1 km north of Ebbsfleet International Station, which offers high speed train connections to St Pancras station with a journey time as low as 17 minutes, and services to and from continental Europe.</p> <p>The North Kent Line, which crosses the southern edge of the Swanscombe Peninsula in an east-west direction, provides slower suburban rail services to London Bridge and Charing Cross stations with a typical journey time of 55 minutes to the latter.</p> <p>Strategic highway routes in the locality include the A2, which passes 3 km to the south of the peninsula and provides a connection to Junction 2 of the M25 motorway to the west and onwards into London. The Dartford Tunnels and Queen Elizabeth II Bridge crossings of the River Thames lie approximately 3 km to the west of the site.</p> <p>The River Thames offers a further option for travel to and from central London.</p>
Transport and accessibility	<p>The North Kent Line already described offers nearby stations at Greenhithe, Swanscombe and Northfleet.</p> <p>Road access to the peninsula is limited. Local roads generally comprise busy urban routes and would be unlikely to cope with the demands of an entertainment resort. However, the open expanse of the Ebbsfleet Valley, which runs broadly southward between Swanscombe and Northfleet past Ebbsfleet International Station towards the A2, affords potential for a new road connection. The valley comprises capped landfill sites and chalk pits.</p>
Environmental constraints	<p>The Swanscombe Peninsula does not contain any international or national wildlife or heritage designations, but is recognised in local plans for its biodiversity potential. An area of the Ebbsfleet Valley adjacent to the HS1 line and known as Baker's Hole is notified as an SSSI and Scheduled Monument in view of its Palaeolithic deposits.</p> <p>Part of the Ebbsfleet Marshes Local Wildlife Site, which</p>

	<p>includes wet woodland and reed beds, is located in the Ebbsfleet Valley part of the Project Site.</p> <p><i>(In a letter dated 30 November 2020 Natural England advised LRCH of its intention to consider most undeveloped areas of the Swanscombe Peninsula for potential notification as a Site of Special Scientific Interest (SSSI), in view of the presence of habitats attractive to invertebrates, scarce plants and breeding birds).</i></p>
<p>Planning constraints</p>	<p>The site lies within the radius of the typical outer boundary of the metropolitan green belt but is excluded from the designated area, because of its brownfield character and its inability to serve a positive green belt function.</p> <p><i>(Since the Swanscombe Peninsula site was originally reviewed by LRCH, the government has established the Ebbsfleet Development Corporation (EDC) with the intention of delivering a Garden City in a designated area between Dartford and Gravesend. As explained in chapter 5: Relevant law and policy of the Environmental Statement (document reference 6.1.5) and the Planning Statement (document reference 7.4), EDC's emerging plans have taken the potential for a resort development into account).</i></p>
<p>Regeneration and economic benefit</p>	<p>The Thames corridor has been recognised since 1990s as a strategic regeneration opportunity, with land becoming available through the decline of traditional industries including cement manufacture, traditional marine activities and power stations. Dartford and Gravesham boroughs both include neighbourhoods with above-average indices of social and economic deprivation, as so areas of Thurrock in Essex on the northern side of the Thames. An entertainment resort would afford employment and training opportunities of a range and number that could have a transformative effect on the economy of the immediate surrounding area.</p>
<p>Observations</p>	<p>This option is closer to central London than most of the others identified and yet is unaffected by green belt constraints. A particular advantage the option affords is the local availability of strategic transport links, including motorway connections and – perhaps most notably – the HS1 services to London and the Continent from Ebbsfleet International Station nearby. The option also offers a large area of brownfield land not subject to statutory nature conservation or heritage designations, and the potential to</p>



	dovetail the resort development with local economic regeneration initiatives.
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### Option 10: Ashford

Criterion	Commentary
Description	Ashford was selected as an area of search in view of its identification as a growth area in the HS1 and M20 corridor. Several large residential, commercial and mixed use developments have progressed around the two's edges, and the 2011 census confirmed that the borough of Ashford experienced the largest population growth in Kent since 2001, with an increase of nearly 15% to 118,000 inhabitants.
Land availability	<p>In a locality with a strong growth agenda, the infill and urban edge sites capable of accommodating major development were all found to be the subject of alternative development proposals. These included the major urban extension areas of Chilmington on the western edge of Ashford and Cheeseman's Green to the south; sites identified for commercial and mixed use at Sevington and a freight depot at Waterbrook, both on the south-eastern edge of the town, and several smaller sites on the northern periphery.</p> <p>With each of these locations the subject of other development proposals, in some cases partly-implemented, the search extended further out from the town, with a focus on finding brownfield sites such as former mineral workings. None was found, suggesting that a resort development in the Ashford area would have to be located on greenfield land, probably in open countryside. Sites along the HS1 / M20 corridor were considered in these terms, but a dedicated halt station serving the resort so close to the established stop at Ashford was not considered to be a realistic option.</p>
Land use	Land on the edges of Ashford is generally used for mixed farming, interspersed with blocks of mature woodland.
Proximity to and connectivity with London	Ashford is 90 km from central London, with high quality transport connections provided by HS1 and the M20, supported by rail services on the London to Folkestone railway. Ashford is 37 minutes from St Pancras International

	by HS1 and c. 1 hour and 10 minutes from Charing Cross and London Bridge stations on commuter services.
Transport and accessibility	As noted, rail and road connections to London and the Channel ports are good. Connections in other directions are limited to single-carriageway roads, including the A2070 link from the A259 south coast road, the A28 from the rural hinterland to the south-west the A28 from Canterbury in the north-east. Ashford also offers connections to coastal and rural centres in Kent and East Sussex.
Environmental constraints	Rural areas around Ashford include individual and groups of listed buildings, conservation areas in village centres and several SSSIs, including Hothfield Common SSSI to the north-west of the town, Hoad's Wood SSSI to the west, Hatch Park SSSI to the south-east and the Wye and Crundale Downs SSSI and SAC to the east. However, all of these protected areas are limited in area with much undesignated land in between. In respect of statutory protected landscapes the Kent Downs AONB extends almost the northern edge of Ashford and comes to within 4 km of the town's eastern edge. The High Weald AONB lies a minimum 15 km to the south-west of the town.
Planning constraints	Large sites with good road access on the edge of Ashford are all the subject of alternative development proposals, some partly implemented. Land further afield is subject to countryside protection policies in local plans.
Regeneration and economic benefit	The local economy is orientated towards growth and an entertainment resort could fit well with this strategy. However, Ashford has low unemployment compared to other parts of the county such as Thanet and the north Kent towns. The town also has a relatively modest population (118,000 in 2011) and is relatively remote from other urban centres from which employees might be drawn, suggesting that recruiting and accommodating resort employees might prove challenging.
Observations	Whilst communications with London and continental Europe are good, the lack of an obvious site, the limitations of local transport and the difficulty of attracting a sufficient local workforce militate against the choice of Ashford for a resort development on the scale envisaged.

## Option 11: Olympic Park legacy development sites

Criterion	Commentary
Description	<p>In parallel with the development of Land at Stratford and other Olympic Games venues for London 2012, the government made provision for ensuring a permanent legacy from the event, embracing sport, learning, socio-economic benefits regeneration and tourism. Following the Games, the London Legacy Development Corporation (LLDC) was established, relaunching the main site at Stratford as the Queen Elizabeth Olympic Park and bringing forward surplus land for development.</p> <p>LRCH investigated the possibility of integrating its entertainment resort proposals with the Olympic Park, taking advantage of the site's close proximity to central London, its new-found familiarity to a global audience and its proven public transport infrastructure.</p>
Land availability	<p>The overall scale of development proposed around the Olympic Park gave grounds for optimism that a suitable location for an entertainment resort could be found. However, the reality is different. For illustration, the LLDC's Local Plan 2015-2031, which was finalised in 2014, identifies development opportunities in four defined 'sub-areas'. Within these sub-areas the land actually available for development is fragmented, with the largest individual parcels within each sub-area being as follows:</p> <ul style="list-style-type: none"> <li>• Sub-area 1: Hackney Wick and Fish Island – largest individual site: East Wick and Here East (23.4 ha)</li> <li>• Sub-area 2: North Stratford and Eton Manor – largest individual site: East Village (18.9 ha)</li> <li>• Sub-area 3: Central Stratford and southern Queen Elizabeth Olympic Park – largest individual site: Stratford Town Centre West (34.5 ha - already committed for the Westfield Stratford City retail centre)</li> <li>• Sub-area 4: Bromley-by-Bow, Pudding Mill, Sugar House Lane and Mill Meads – largest individual site: Pudding Mill (15.68 ha)</li> </ul>

	<p>LRCH concluded that no single legacy sites were suitable for an entertainment resort. Even the largest was far too small and most land parcels were additionally constrained by heritage considerations, development height restrictions and the local presence of residential neighbourhoods. Development of any of these sites would require a level of integration into the surrounding urban fabric that is not feasible for an entertainment resort.</p> <p>In the absence of a suitable site, consideration of the Olympic Park legacy sites was terminated.</p>
Land use	(See above)
Proximity to and connectivity with London	(See above)
Transport and accessibility	(See above)
Environmental constraints	(See above)
Planning constraints	(See above)
Regeneration and economic benefit	(See above)
Observations	(See above)