

# THE LONDON RESORT

## The London Resort Development Consent Order

BC080001

### Environmental Statement Volume 2: Appendices

#### Appendix 7.2 – Detailed methodology

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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)

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## Appendix 7.2 ◆ Detailed Methodology

### INTRODUCTION

7.2.1 This appendix presents the detailed methodology relating to Chapter 7: *Land use and socio-economics* (document reference 6.1.7) of the Environmental Statement as part of the DCO application.

### DETAILED METHODOLOGY AND DATA SOURCES

#### Scoping

7.2.2 The Applicant submitted an EIA Scoping Report in 2014 (document reference 6.2.1.1). The Secretary of State's Scoping Opinion is summarised below along with reference to where the relevant matters are addressed in Chapter 7: *Land use and socio-economics* (document reference 6.1.7).

**Table 7.2.1 2014 scoping opinion and responses**

Scoping comment	Response
The Scoping Report states that the proposed development could generate in the region of 27,000 direct and indirect jobs. The method used to calculate this is not described, however the Secretary of State welcomes the proposals to provide more detailed information in this regard in the ES (for both construction and operation).	More detail is provided on the methodology underpinning these job estimates. Refer to Appendix 7.4: <i>Non Significant Effects</i> (document reference 6.2.7.4) for the construction jobs methodology, and Chapter 7: <i>Land use and socio-economics</i> (document reference 6.1.7) for the operational jobs.
The characteristics of jobs generated by the project should be clearly described. This should include information on whether jobs are permanent/part-time, the range of skills required, the seasonality of employment, the catchment area for employment and how proposed employment compares with the available workforce in the area.	Table 7.34 in Chapter 7: <i>Land use and socio-economics</i> (document reference 6.1.7) provides detailed information on the characteristic of the jobs. The catchment area is assessed in potential effects of new employment on skills and training and the availability of the workforce is considered in the operational employment baseline.
The assessment should also consider the potential impacts of any existing land uses/jobs that would be lost or displaced by the proposed development. This should not be limited to employment uses but also include community uses such as open spaces, public rights of way and other recreational or community facilities.	This assessment considers the impact of displacement of businesses, jobs and community uses.
The proposed development includes significant retail and other uses (e.g. event/exhibition space and hotel accommodation) which could impact upon similar existing provision within the wider local area, including Bluewater Retail Park. The ES should describe how the proposals compare with	Initial assessments of the impact on retail and leisure, hotels and local housing supply have been undertaken. More detail can be found in Appendix 7.9: <i>Retail and Leisure Impact Assessment</i> (document reference 6.2.7.9), which has been developed in advance of the DCO.

Scoping comment	Response
existing provision and consider the potential for adverse effects. Potential indirect effects on local housing supply should also be assessed, as highlighted by GBC (Appendix 2).	
The method used to calculate the likely number/growth of visitors to the resort should be described. The potential for the development to affect visitor numbers at other similar attractions in England and abroad should be assessed.	The method is described in Chapter 7: <i>Land use and socio-economics</i> (document reference 6.1.7). The impact of the London Resort on other similar attractions is assessed in the potential effects of trade creation and diverse relating to theme parks. The potential impact on similar attractions abroad will be considered in Chapter 21: <i>Cumulative, in-combination and transboundary effects</i> (document reference 6.1.21).
Paragraph 13.38 of the Scoping Report notes that the assessment will need to draw judgements on the net effects of visitor expenditure (both on and off site). Any such judgements should be clearly explained and justified. In this regard the Secretary of State welcomes the proposed use of scenarios (based wherever possible on research from other similar resorts) to determine likely best and worst case impacts. These scenarios should be clearly explained and defined in the ES.	This assessment presents the impact of visitor and worker expenditure associated with the London Resort. Visitor expenditure is estimated based on average spending estimates from Visit Britain and accounts for displacement from other holidays within the UK. This approach is under review.
The Secretary of State notes and welcomes the consideration given to the potential for socio-economic transboundary effects from the proposed development. Table 13.7 indicates the potential for transboundary effects and Paragraph 13.57 states that consideration will be given to the relative materiality and characteristics of such effects. The applicant is encouraged to consult early with potentially affected EEA States to ensure the ES includes sufficient information to determine the potential for significant effects.	Transboundary effects are covered in more detail in Chapter 21: <i>Cumulative, in-combination and transboundary effects</i> (document reference 6.1.21).
Further advice on the recommended approach to dealing with potential transboundary effects is provided in Section 4 of this Opinion and in Planning Inspectorate Advice Note 12.'	Transboundary effects are covered in more detail in Chapter 21: <i>Cumulative, in-combination and transboundary effects</i> (document reference 6.1.21).

7.2.3 As Chapter 1: *Introduction* (document reference 6.1.1) explains, LRCH 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. 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 EIA Scoping Opinion 2020 along with the reference to where the relevant matters are addressed in the ES.

**Table 7.2.2 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 in Chapter 7: <i>Land use and socio-economics</i> (document reference 6.1.7) 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 in Chapter 7: <i>Land use and socio-economics</i> (document reference 6.1.7) 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.</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</p>	<p>Information on the approach is contained in paragraphs 7.2.51-7.2.55. 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</p>

Scoping opinion advice	Applicant’s response and reference
cumulative effect assessment should be undertaken, where significant effects are likely to occur.	account for these changes.
<p>4.1.7 – Mitigation</p> <p>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 Chapter 7: <i>Land use and socio-economics</i> (document reference 6.1.7) sets out the proposed mitigation and enhancement measures and clearly distinguishes between which are mitigation measures and which are enhancement.</p>

**External engagement**

7.2.4 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.

7.2.5 Engagement with local authorities and the EDC<sup>1</sup> 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

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

cumulative schemes are considered.

- As the locality is undergoing so much change, the importance of considering cumulative impacts along with other known developments and plans for the area was highlighted.

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

Local authorities and EDC

7.2.7 The Applicant has engaged with all the host authorities and EDC to discuss key socio-economic aspects. Chapter 7: *Land use and socio-economics* (document reference 6.1.7) has been informed through that engagement. The engagement discussed many socio-economics topics but 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 partners to develop the employment and skills offer.

7.2.8 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

7.2.9 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 Taskforce – 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 higher education providers in a series of workshops (as described in the strategy) which

have informed the emerging education proposals outlined in the strategy. Ongoing discussion with the taskforce and other stakeholders will inform the strategy prior to its finalisation.

7.2.10 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

7.2.11 The Applicant presented to the community liaison group on employment and skills to understand local views. 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

7.2.12 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 7.2.9).

**S42 consultation**

7.2.13 This section summarises the S42 consultation responses relevant to socio-economics. It describes the key themes and how they have been addressed in Chapter 7: *Land use and socio-economics* (document reference 6.1.7).

**Table 7.2.3 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 Chapter 7: <i>Land use and socio-economics</i> (document reference 6.1.7) and in Appendix 7.8: <i>Construction Workforce Accommodation Strategy</i> (document reference 6.2.7.8).
Impact of the London Resort on the delivery of employment and housing land.	Chapter 7: <i>Land use and socio-economics</i> (document reference 6.1.7) 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	Chapter 7: <i>Land use and socio-economics</i>



Theme from the S42 consultation	The Applicant's response
<p>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.</p>	<p>(document reference 6.1.7) considers the effect of the displacement of the businesses. It considers the 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.</p>
<p>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.</p>	<p>Chapter 7: <i>Land use and socio-economics</i> (document reference 6.1.7) 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.</p>
<p>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.</p>	<p>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. 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.</p>
<p>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.</p>	<p>Chapter 7: <i>Land use and socio-economics</i> (document reference 6.1.7) considers the effect of the London Resort on retail and leisure. It considers the impact on town centres and other local destinations, including theatres.</p>
<p>Ensuring the cumulative assessment takes account of all the cumulative effects, including the impact on local social infrastructure and the demand for construction jobs. The chapter should also be clear where the assessment is inherently cumulative, and what is done when it is not.</p>	<p>0 in this appendix summarises whether the assessment is inherently cumulative for each effect. Where it is not, more information is provided in the relevant future baseline to assess the cumulative impact. The Appendix 7.3: <i>Detailed Baseline</i> (document reference 6.2.7.3) specifically considers the cumulative demand for construction jobs, for example.</p>

## Scope of this chapter

7.2.14 This section of the appendix summarises the receptors, the potential effects and the spatial and temporal scope over which these effects are assessed. The approach to assessment in Chapter 7: *Land use and socio-economics* (document reference 6.1.7) is consistent with that proposed in the Scoping Report. Some additional receptors have been added (see paragraph 7.2.16 for explanation of this change) and the spatial scope, whilst consistent with the study areas detailed in the Scoping Report, have been expanded upon in order to appropriately capture effects at different spatial levels, and renamed for ease of reference (see Table 7.2.5 for definitions and the rationale for each study area used).

### *Receptors*

7.2.15 The receptors listed below may experience likely significant effects as a result of the construction and operation of the London Resort:

- **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 the places they visit (including 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; and
- **community facilities:** community facilities (including open space and public rights of way) and the people who use them.

7.2.16 The receptors identified above have changed since the Scoping Report was published. The 2020 Scoping Report only identified three receptors (residents, housing market and businesses). This assessment expands the receptors to include two further categories (employment, skills and training providers, and community facilities) that are likely to be affected by the London Resort.

### *Identification of potential effects*

7.2.17 The following table summarises the potential socio-economic effects as a result of London Resort.

7.2.18 An additional effect, 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 for completeness.

**Table 7.2.4 Potential socio-economic effects and receptors**

<b>Activity</b>	<b>Effect</b>	<b>Receptor(s)</b>
<b>POTENTIAL CONSTRUCTION EFFECTS</b>		
Temporary construction employment and supply chain	Potential temporary effect of employment generation and effects on businesses in the supply chain	Residents Businesses
	Potential temporary effect of employment on the labour market, skills and training	Residents Employment, skills and training providers
	Potential temporary effect of the construction workforce on crime levels	Residents; Businesses
	Potential temporary effect of the construction workforce on local healthcare	Residents
	Potential temporary effect of employment generation on the accommodation market (including private rented and short-term accommodation)	Homes Residents
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
	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 facilities (and their users)
	Potential temporary or permanent displacement of residential dwellings as a result of property acquisition	Homes Residents
	Potential temporary or permanent disruption to housing delivery as a result of the land take and construction works	Homes Residents
<b>POTENTIAL OPERATIONAL EFFECTS</b>		
Employment generation	Potential effects associated with net additional employment (including indirect and induced effects, and characteristics of jobs generated by the project)	Businesses
	Potential effects of new employment on skills and training	Residents Employment, skills and training providers
Visitor generation	Potential effects of trade creation and diversion relating to theme parks	Businesses

Activity	Effect	Receptor(s)
Visitors and workers	Potential effects of visitors and workers on local accommodation options and the housing market	Homes Residents Businesses Visitors to Kent
	Potential effects of visitor and worker expenditure	Businesses
	Potential effect of workers and visitors on healthcare provision	Residents
	Potential effect of workers and visitors on other public services	Residents
	Potential effect on local retail and leisure, including town centres	Businesses

### Spatial scope (study areas)

- 7.2.19 The Project Site includes land located on both sides of the River Thames in the local authority areas of Dartford and Gravesham in north Kent, and Thurrock unitary authority in Essex.
- 7.2.20 The geographical extent of potential socio-economic effects from the London Resort 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 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 (the PSB as listed in Table 7.2.5), but the people who work at these businesses are unlikely to live within this immediate study area as there are few residential properties.
- 7.2.21 A proportionate approach is taken in applying judgment to decide upon appropriate study areas for different effects. It is impossible to identify every possible exact geographical area over which effects will be felt, and so the most appropriate geographies over which each effect is likely to be felt are utilised. When defining study areas, the likelihood of significant effects must also be taken into consideration when applying this proportionate approach. One example would be the LCA, which is the area from which the majority of workers will be drawn. Whilst some may commute further than this, the numbers are likely to be low and thus in the context of those wider areas and their labour markets, such effects will not be significant.

**Table 7.2.5 Geographical study area definitions and rationale**

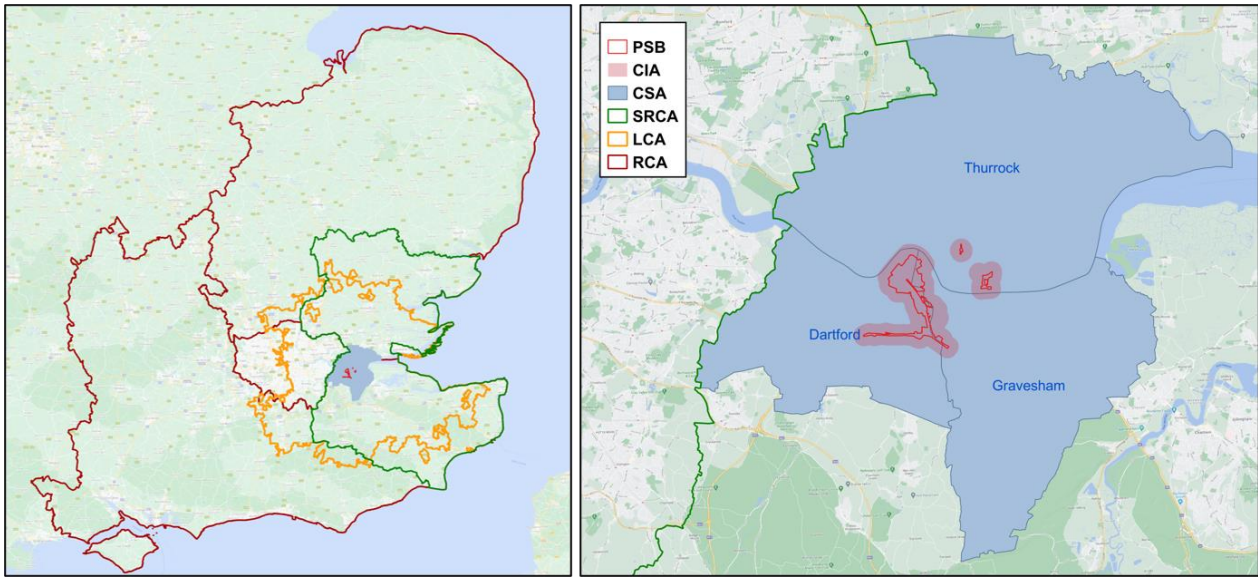
<b>Geographical Study Area</b>	<b>Definition</b>	<b>Rationale</b>
The Project Site Boundary (PSB)	The DCO Order Limits.	The PSB study area is used for effects which are at the Project Site level. It is used for the assessment of displacement / loss of businesses.
Community Impact Area (CIA)*	A 500m radius around the PSB.	The CIA is used to assess the displacement / loss of community uses, such as open spaces, public rights of way and other recreational or community facilities. This is because the community uses affected will be in or near the Project Site.
Dartford	The boundary of Dartford local authority	The Dartford dwelling requirements are used to assess the impact of the displacement of residential dwellings as a result of property acquisition on the Dartford housing market
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 the CSA level.
Sub-Regional Context Area <sup>2</sup> (SRCA)	Kent and Medway, Essex, Thurrock (combination of districts).	This study area is presented in the baseline for context but is not used to assess the significance of any effects.
Labour Catchment Area (LCA)	A 60-minute travel time (car or public transport) to the site. <sup>3</sup>	60 minutes is considered a reasonable commuter time for an employee. This study area is used to assess employment effects given it is likely that the majority of workers will come from within this study area.
Regional Context Area (RCA)	South East, East and London.	This study area is presented in the baseline predominantly for context. This area is used to assess the significance of one effect – trade diversion from other theme parks. This is 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).	Due to the nationally significant nature of the London Resort, some socio-economic effects need to be considered at a national level, in particular the provision of a theme park which will compete on a global scale, which is addressed within the trade creation effect.

<sup>2</sup> Defined as county / unitary authorities to be consistent with ONS statistical data releases.

<sup>3</sup> 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.

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

**Figure 7.1 Study areas**



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7.2.22 Table 7.2.6 shows the study area for each effect.

**Table 7.2.6 Study area by effect**

Activity	Effect	Study Area
<b>CONSTRUCTION EFFECTS</b>		
Temporary construction employment and supply chain	Potential temporary effect of employment generation and effects on businesses in the supply chain	LCA National
	Potential temporary effect of employment on the labour market, skills and training	CSA
	Potential temporary effect of the construction workforce on crime levels	CSA
	Potential temporary effect of the construction workforce on local healthcare	CIA
	Potential temporary effect of employment generation on the accommodation market (including private rented and short-term accommodation)	CSA

Activity	Effect	Study Area
Displacement to land and property as a result of the land take	Potential temporary or permanent displacement / loss of businesses and other services	PSB CSA
	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	PSB; CIA
	Potential temporary or permanent displacement of residential dwellings as a result of property acquisition	Dartford
	Potential temporary or permanent disruption to housing delivery as a result of the land take and construction works	Dartford
<b>OPERATIONAL EFFECTS</b>		
Employment generation	Potential effects associated with net additional employment (including indirect and induced effects, and characteristics of jobs generated by the project)	CSA LCA National
	Potential effects of new employment on skills and training	CSA
	Potential effect of employment generation on the housing market	CSA
Visitor generation	Potential effects of trade creation and diversion relating to theme parks	National RCA
Visitors and workers	Potential effects of visitors and workers on local accommodation options and the housing market	CSA
	Potential effects of visitor and worker expenditure	CSA
	Potential effect of workers and visitors on healthcare provision	CIA
	Potential effect of workers and visitors on other public services	CIA
	Potential effect on local retail and leisure, including town centres	CSA

**Temporal scope (assessment years)**

7.2.23 This section discusses the temporal scope that is considered in the assessment of socioeconomic effects.

7.2.24 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 Table 7.2.7.

**Table 7.2.7 The London Resort indicative timescales**

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

7.2.25 A number of core assessment years have been chosen for this assessment reflecting this phased approach to the construction of the development. This results in several complexities in the temporal analysis of effects. The assessment therefore considers several core assessment years to account for the two construction periods and the phased approach to the opening of the London Resort. The core assessment year varies 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 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 which it is important to consider within the assessment, for example the opening of Gate Two, or the maturity of attendance to the whole London Resort.

#### ***Construction phases (2022 – 2029)***

7.2.26 The construction phases for Gates One and Two will be continuous so there is effectively one construction phase for the purposes of the assessment. The core assessment years considered during the construction phase include:

- **2022:** the assessment year for effects relating to the displacement/loss of businesses and community uses. This is worst-case assessment as it is the earliest year in the construction phase; and
- **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 will therefore be 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 phases (2024 onwards and 2029 onwards)***

7.2.27 Gate One is expected to become operational in 2024 and Gate Two is expected to be operational in 2029. For the purposes of this assessment, the operational phase will be



defined as a single continuous phase, with several core assessment years:

- 2025: the first full calendar year of Gate One operations;
- 2030: the first full calendar year of Gate Two operations; and
- 2038: maturity – the London Resort will be fully operational and established.

**Table 7.2.8 Assessment years for socio-economic effects**

Potential effect	Assessment year(s)
<b>CONSTRUCTION EFFECTS</b>	
Potential temporary effect of employment generation and effects on businesses in the supply chain	2023: peak construction workforce for Gate One
Potential temporary effect of employment on the labour market, skills and training	2022-2029: construction period for Gates One and Two
Potential temporary effect of the construction workforce on crime levels	2023: peak construction workforce for Gate One 2028: peak construction workforce of Gate Two, at which time Gate One will be operational
Potential temporary effect of the construction workforce on local healthcare	2023: peak construction workforce for Gate One
Potential temporary effect of employment generation on the housing market (including private rented and short-term accommodation)	2023: peak construction workforce for Gate One 2028: peak construction workforce of Gate Two, at which time Gate One will be operational
Potential temporary or permanent displacement / loss of businesses and other services	2022: start of construction phase
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	2022: start of construction phase
Potential permanent displacement of residential dwellings within the PSB as a result of property acquisition	2022: start of construction phase
Potential temporary or permanent disruption to housing delivery as a result of the land take and construction works	2022: start of construction phase
<b>OPERATIONAL EFFECTS</b>	
Potential effects associated with net additional employment (including indirect and induced effects, and characteristics of jobs generated by the project)	2025: first full year of the operation of Gate One 2030: first full year of the operation of the whole Resort 2038: maturity
Potential effects of new employment on skills and training	2025: first full year of the operation of Gate One 2030: first full year of the operation of the whole Resort 2038: maturity
Potential effects of trade creation and diversion	2025: first full year of the operation of Gate One 2030: first full year of the operation of the whole

Potential effect	Assessment year(s)
relating to theme parks	Resort 2038: maturity
Potential effects of visitors and workers on local accommodation options and the housing market	2025: first full year of the operation of Gate One 2030: first full year of the operation of the whole Resort 2038: maturity
Potential effects of visitor and worker expenditure	2025: first full year of the operation of Gate One 2030: first full year of the operation of the whole Resort 2038: maturity
Potential effect of workers and visitors on healthcare provision	2025: first full year of the operation of Gate One 2030: first full year of the operation of the whole Resort 2038: maturity
Potential effect of workers and visitors on other public services	2025: first full year of the operation of Gate One 2030: first full year of the operation of the whole Resort 2038: maturity
Potential effect on local retail and leisure, including town centres	2025: first full year of the operation of Gate One 2030: first full year of the operation of the whole Resort 2038: maturity

## Baseline

7.2.28 In Chapter 7: *Land use and socio-economics* (document reference 6.1.7), the baseline information is ordered and grouped in terms of relevance to each effect which the chapter then goes on to assess. Where baseline information is relevant to several effects, it is set out chronologically – that is to say the information is explained once, the first time it is relevant, and then the same information is cross referred back to as appropriate and required.

7.2.29 The data sources used to inform the socio-economic baseline are summarised in Table 7.2.9, which sets out the data, the source, the year and the confidence. Confidence is a measure of the reliability of the data source.<sup>4</sup> Census 2011 has been used where appropriate as it still represents the most comprehensive set of socio-economic data for many indicators. It is acknowledged, however, that this source is increasingly out of date. For this reason, despite the accuracy and coverage of the Census, it is designated a confidence rate of medium rather than high, reflecting the fact that it may no longer be fully representative, rather than any reflection on its accuracy.

7.2.30 The year column in Table 7.2.9 shows the year in which the data were produced. In most instances that year is also the year for which the data are representative (for example the Census 2011 was collected in 2011 and represents data for 2011). However, in some instances the data were collected or produced in a given year but reflect a different period. This is most common in sources of forecasts which are used to inform the future baseline.

An example of this is the five-year housing supply, where the forecasts were made in 2016, 2018 and 2019 (different for each of the three local authorities which make up the CSA) but represent housing need for future five-year periods.

**Table 7.2.9 Data sources used to inform the economic assessment**

Data	Source	Year	Confidence <sup>4</sup>
Working age residents employed in construction	ONS, Annual Population Survey, January to December 2019	2019	High
Resident qualifications			
Workplace qualifications			
Economic activity of residents			
Employment	ONS, Business Register and Employment Survey, 2018	2018	High
Employment growth			
Employment by industry			
Business counts by size and industry	ONS, UK Business Counts, 2019	2019	High
Unemployment and unemployment rate	ONS, model-based estimates of unemployment, 2019	2019	High
Claimant count	ONS, Claimant Count by sex and age	2019	High
Not in employment, education or training (NEET)	Department for Education, NEET and participation: local authority figures, 2019	2019	High
Construction employment growth 2019-2023	Construction Skills Network forecasts 2019-2023, 2019	2019	Medium
Construction qualifications	Census, 2011	2011	Medium
Earnings	ONS, Annual Survey of Hours and Earnings, 2019	2019	High
Apprenticeship starts, achievements, by size, by level, by	Department for Education, Apprenticeships and traineeships	2019	High

<sup>4</sup> 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.)

Data	Source	Year	Confidence <sup>4</sup>
industry 14/15 to 17/18	data		
Crime over time to 2019	ONS Crime Statistics, 2019	2019	High
GPs	NHS Digital – GP Workforce Statistics March 2020	2020	Medium
Dentists	NHS Dental Statistics, 2019-20	2020	Medium
Pharmacies Community uses Emergency services	Ordnance Survey Addressbase Premium, 2020	2020	Medium
Tourism bed spaces within CSA	Visit Britain Accommodation Stock Audit, 2016	2016	Medium
Private Rented Sector bed spaces within CSA Owner Occupied bed spaces within CSA	MCHLG, Live tables on dwelling stock (including vacant properties), Table 100 Dwelling stock: Number of Dwellings by Tenure and District: England; 2019	2019	High
Businesses within the project red line boundary	Valuation Office Agency, Non-Domestic Ratings, 2020 <sup>5</sup>	2020	High
Residential dwellings within the project red line boundary	Information requests by land referencing company LRS on behalf of LRCH	2020	Medium
Mid-year population estimates Population age structure	ONS, Mid-year population estimates, 2018	2018	High
Population growth 2018 to 2038	ONS, Population Projections, 2020	2020	Medium
Employment growth 2018 to 2038	Understanding Kent and Medway's Growth Requirements, 2015 North Kent Strategic Housing and Economic Needs Assessment, March 2015 Thurrock Council, Addendum to the South Essex Strategic Housing Market Assessment, May 2017	2015; 2017	Medium

<sup>5</sup> Contains public sector information licensed under the Open Government Licence v3.0

Data	Source	Year	Confidence <sup>4</sup>
Housing need	Five Year Housing Supply Reports (Dartford - 2019, Gravesham - 2018, Thurrock – 2020 (via consultation); 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	2016, 2019, 2018, 2020	Medium
Theme park attractions globally and in the UK	Aecom, Global Theme Park Attractions Report, 2019	2019	Medium
Retail and Leisure	Dartford Council, 2017, Carter Jonas Bluewater Shopping Centre Proposed Extension - Retail Planning Impact Appraisal (RPIA); Gravesham and Medway Councils, 2016, North Kent SHENA — Retail & Commercial Leisure Assessment; Thurrock Council, 2017, South Essex Retail Study; ONS, 2019, Household Expenditure Survey	2017; 2016; 2017	Medium
Education	Department for Education, Edubase, 2019	2019	High

**Assessment methodology**

7.2.31 Chapter 6: *EIA assessment methodology* (document reference 6.1.6) of this ES outlines the general assessment approach adopted for this EIA. There is not any current UK legislation or government guidance that details the specific content that is required to complete a socio-economic assessment. There is also currently no legislation and/or guidance that outlines recommended standard thresholds for the assessment of significance of socio-economic effects.

7.2.32 A summary of the assessment procedure in this chapter is provided below:

- identification of socio-economic receptors potentially affected by the London Resort;
- assessment of the sensitivity of these receptors through desk-based studies of policy and baseline datasets, contextualisation and comparison with benchmarks, and assessment of how the sensitivity of receptors may change under future baseline conditions, particularly with respect to changes in demographic and economic variables such as population and employment;
- Assessment of the mechanisms by which the London Resort may impact identified receptors, in terms of the magnitude – the ‘size’ or ‘amount’ of the impact; and
- Combining the sensitivity of the receptor with the magnitude of the impact, the effect significance is determined.

7.2.33 Effects are identified from the interaction between the magnitude of impacts and the sensitivity of receptors.

**Receptor sensitivity**

7.2.34 From a socio-economic perspective, sensitivity is interpreted as the ability of a given geographical area, community, resource, or receptor to deal with or respond to change. This ability may be influenced by the geographic extent of the receptor and recent rates of change.

7.2.35 As there exists no industry standard criteria for determining the sensitivity of receptors, receptor sensitivity is assessed on a case-by-case basis, using professional judgment informed by the baseline statistics, although broad definitions of the receptor sensitivities are given in Table 7.2.10.

**Table 7.2.10 Broad definitions of sensitivity levels for socio-economic receptors**

Sensitivity of receptor	Definition
High	Represents a very significant and persistent socio-economic issue. 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. The effect of changes to the receptor would be highly noticeable possibly due to surplus capacity/high scarcity.
Medium	Represents a moderate socio-economic matter for consideration. Changes to the receptor would bring about noticeable changes in conditions in the area.
Low	The socio-economic indicator is performing well and/or is largely insensitive to changes in baseline conditions.

**Impact magnitude**

7.2.36 The assessment of magnitude of impact will be undertaken based on expert judgment as

there are no industry standard criteria. The magnitude of impact is the degree of change in the socio-economic determinant compared to the baseline conditions. The classification of magnitude of impact on socio-economic receptors takes account of such factors as:

- the spatial scale at which the effect is assessed;
- the frequency of the effect;
- the degree of change relative to existing environmental conditions;
- the reversibility of the effect; and
- the duration over which the effect occurs.

7.2.37 Magnitude is assessed as high, medium, low or negligible. The assessment aims to be objective, quantifying the magnitude of impact wherever possible. Where quantification is not possible, qualitative assessments are made and justified.

### ***Significance of effect***

7.2.38 Table 7.2.11 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.

7.2.39 Embedded mitigation is referred to and included in the assessment of effects. If the effect does not require secondary mitigation (or none is possible), the residual effect will remain the same. If, however, secondary mitigation is required, an assessment of the post-mitigation residual effect is provided.

**Table 7.2.11 Effect significance matrix**

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

7.2.40 Effects that are classified as moderate or major are significant.

### **Assumptions and limitations**

#### ***Engagement***

7.2.41 Engagement is ongoing and will continue post-submission for some parts of the

assessment. For example, Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7) is outline at the time of the DCO submission and will evolve following engagement with schools and other employment and skills partners. Chapter 7: *Land use and socio-economics* (document reference 6.1.7) reflects that engagement to date.

### **Baseline data**

7.2.42 The assessment of the existing environment is naturally limited to the availability of baseline data. Existing baseline economic conditions have been established through interpretation of nationally recognised research, data and survey information. The most recent data published for the given study areas are used throughout this assessment, with a preference for using the most up to date data (2018, 2019 or 2020) where possible. Where data from these years are not available, the next best alternative has been used (i.e. the most up-to-date). In some cases, the next best alternative dataset will be the 2011 Census, which although now dated, provides very detailed spatial information for a large number of different indicators and includes the whole population. The Census is the most comprehensive database of demographics in the UK.

7.2.43 The data sources are referenced throughout Chapter 7: *Land use and socio-economics* (document reference 6.1.7) and the data are sourced from the ONS where possible.

7.2.44 The assessment presents baseline data over a reasonable period of time, where time series data are available, so that the impact of any short-term shocks or changes can be identified in the baseline. This may be relevant to the impact of COVID-19 on health, social, economic, and demographic baseline data. Where relevant, the impact of COVID-19 on the receptor sensitivity and conclusions is discussed in this chapter. The likely impact depends on whether the effect is short or long term in nature. Short term effects may have to consider the impact of COVID-19, but the impact in the longer term is expected to be reduced significantly.<sup>6</sup>

7.2.45 Information on the future baseline is presented where available, based upon economic, social or community infrastructure plans or projections. Where it is not available, the receptor population affected in the future assessment years are assumed to have the same sensitivity as the population in the baseline.

### **Economic projections**

7.2.46 In order to assess the anticipated trends in baseline conditions, Chapter 7: *Land use and socio-economics* (document reference 6.1.7) collates economic forecasts produced for local authorities. These are all detailed in Table 7.2.9.

7.2.47 There are well documented limitations with the use of economic projections of this kind,

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<sup>6</sup> Even under the most pessimistic scenario, economic activity is expected to return to pre-crisis levels by 2024, indicating that the majority of the effects of COVID-19 are expected in the short-term. Office for Budget Responsibility, 2020, Fiscal Sustainability Report July 2020



predominantly with respect to accounting for changes to the economy. These types of projections rely on a set of national macroeconomic assumptions that are taken as a starting point, with forecasts proportioned down to regional and local authority levels following analysis of the existing economic composition of an area, including the likes of its sectoral make up for example. This methodology means that forecasts do poorly in reacting to significant shocks to the macroeconomy. Data limitations at the local authority level make it difficult for these top down forecasts to accurately account for local factors that have an impact on population and employment growth. These forecasts are considered best practice for analysing future trends in baseline conditions, however, as it is widely acknowledged that they are helpful in indicating the approximate scale and direction of future population and employment growth, including within specific employment sectors.

7.2.48 There are several uncertainties relating to forecasting the impact of the London Resort, most of which are inherent in forecasting the impact of any major project. The assessment deals with this through transparency of assumptions and scenario testing. For example, the assessment presents a range of scenarios wherever relevant, in order to reflect any uncertainty. Similarly, where uncertainty exists about the future baseline, a conservative approach is taken wherever appropriate. For example, there are planned delivery of new community facilities and hotels as part of the Ebbsfleet Garden City, but the exact quantum, nature and timing of these future changes are not known with any certainty. Where it appropriate to do so therefore, the delivery of these future baseline changes, whilst acknowledged to be likely, are not relied upon for assessing the impacts of the London Resort.

### **COVID-19**

7.2.49 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 sources which state that the impact of the pandemic is not expected to be persistent, with recovery to pre-pandemic levels expected by 2024 (the opening year of Gate One).<sup>7</sup> 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.

7.2.50 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 concrete 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 as well as evidence that of impacts upon levels of mental health. Similarly, there are also indications that COVID-19 could accelerate changes in the retail and leisure sector. Chapter 7: *Land use and socio-economics* (document reference 6.1.7) does not assess the

<sup>7</sup> Bank of England (2020); Monetary Policy Report August 2020

implications for other operational effects where there is much 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.

**Cumulative effects assessment**

7.2.51 The baseline assessment presents data on the evolution of the baseline for some socio-economic indicators. Specifically, projections of employment and population, are presented for each of the core assessment years. Similarly, for housing, the local authorities’ five-year housing supply and any available future plans for housing growth beyond this have also been included. These are not always available for all assessment years on a consistent basis across all relevant geographies and so available data, uncertainties and limitations have been presented and transparently explained.

7.2.52 These projections should implicitly account for changes in population, housing, and employment as a result of other future developments brought forward in the relevant geographic areas. However, it is possible that the projections do not sufficiently account for future changes in the baseline, and hence this assessment sense checks projections based on consented growth for future developments, such as the growth planned at Ebbsfleet Garden City, to identify whether any changes in employment and/or population are potentially greater than what is forecast under the future baseline scenario.

7.2.53 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. The following table considers whether the approach is inherently cumulative for each effect and if it is not, then provides more detail on how cumulative effects are considered. The cumulative considerations – be they projections or assessments of future developments - are contained in the future baseline for each effect.

**Table 7.2.12 Approach to cumulative effects by effect**

Potential effect	Approach to cumulative assessment
<b>CONSTRUCTION EFFECTS</b>	
Potential temporary effect of employment generation and effects on businesses in the supply chain	Not inherently cumulative. The future baseline for this effect considers the construction workforce requirements of local developments.
Potential temporary effect of employment on the labour market, skills and training	Inherently cumulative. The future baseline presents projections on the demand for construction jobs.
Potential temporary effect of the construction workforce on crime levels	Not inherently cumulative. The future baseline considers the increase in crime associated with future developments’ construction workforces.
Potential temporary effect of the construction workforce on local healthcare	Not inherently cumulative. The future baseline considers the construction workforce in the CSA

	and healthcare services associated with future developments.
Potential temporary effect of employment generation on the housing market (including private rented and short-term accommodation)	Not inherently cumulative. The future baseline considers the non-home based construction workers and change in accommodation market associated with the future development.
Potential temporary or permanent displacement / loss of businesses and other services	Not inherently cumulative. The future baseline considers the impact of future developments on local businesses.
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	Not inherently cumulative. The future baseline considers the impact of future developments on community uses.
Potential permanent displacement of residential dwellings within the PSB as a result of property acquisition	Inherently cumulative. The future baseline presents housing projections.
Potential temporary or permanent disruption to housing delivery as a result of the land take and construction works	Not inherently cumulative. The future baseline considers changes to housing allocations in the area of construction works
<b>OPERATIONAL EFFECTS</b>	
Potential effects associated with net additional employment (including indirect and induced effects, and characteristics of jobs generated by the project)	Inherently cumulative. The future baseline presents employment projections.
Potential effects of new employment on skills and training	Inherently cumulative. The future baseline presents employment projections.
Potential effects of trade creation and diversion relating to theme parks	Not inherently cumulative. The future baseline considers changes in the theme park market and leisure trends as a result of committed developments.
Potential effect of visitors and workers local accommodation options and the housing market	Information on the housing market baseline is inherently cumulative, as the future baseline presents housing projections. Information on the local accommodation options is not inherently cumulative. The future baseline considers changes in the accommodation stock as a result of committed developments.
Potential effects of visitor and worker expenditure	Inherently cumulative. The future baseline presents spending projections.
Potential effect of workers and visitors on healthcare provision	Not inherently cumulative. The future baseline presents information on changes to healthcare provision as a result of committed developments.
Potential effect of workers and visitors on other public services	Not inherently cumulative. The future baseline presents information on changes to public service provision as a result of committed developments.
Potential effect on local retail and leisure, including town centres	Inherently cumulative. The future baseline presents projections of retail floorspace.

- 7.2.54 In Chapter 7: *Land use and socio-economics* (document reference 6.1.7), where the baseline information is considered for each effect, the chapter also presents information on the future baseline. For some effects, the future baseline uses a projection of employment or population to understand how the study area is likely to change in each assessment year. For other effects, the future baseline summarises relevant aspects of future developments (examples of which are given above, for example any planned changes to community facilities) which are relevant to the future baseline for the effect in question. Where there are no projections and/or the committed developments are not expected to significantly change the future baseline, effects are assessed against the current baseline.
- 7.2.55 This assessment is therefore inherently cumulative as it incorporates the likely effect of the future developments through presenting a combination of both projections and plans for key socio-economic variables and how they will change over time. As effects are considered against an evolved baseline model that has grown over time, a separate assessment of the cumulative impact of future schemes would risk double counting. Based on this approach, the need for a cumulative effects assessment which considers the overall impact of other, specific future developments is redundant.