The London Resort Development Consent Order

BC080001

Environmental Statement
Volume 2: Appendices

Appendix 7.4 – Non Significant Effects

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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 7.4 ◆ Non-significant effects

INTRODUCTION

7.4.1 This appendix details the non-significant effects relating to Chapter 7: *Land use and socio-economics* (document reference 6.1.7) of the Environmental Statement as part of the DCO application.

7.4.2 The study areas presented in this appendix are consistent with that presented in Chapter 7: *Land use and socio-economics* (document reference 6.1.7), as shown in Table 7.4.1. The listed study area abbreviations are used throughout the appendix.

Table 7.4.1 Study areas considered in the London Resort

Geographical Study Area	Definition	Rationale
The Project Site Boundary (PSB)	The DCO Order Limits. Refer to Diagram 7.1 in Chapter 7: *Land use and socio-economics* (document reference 6.1.7) for a map of the PSB	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 as the community uses affected will be in or near the Project Site.
Dartford	The borough boundary of Dartford local authority	The Dartford dwelling requirements are used to assess the impact of the displacement of 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 at the CSA.
Sub-Regional Context Area[1] (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[2].	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.

[1] Defined as county / unitary authorities to be consistent with ONS statistical data releases.

[2] 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.

Geographical Study Area	Definition	Rationale
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, Great Britain, United Kingdom (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.

7.4.3 The assessment years used in this appendix are the same as those used in Chapter 7: *Land use and socio-economics* (document reference 6.1.7), summarised in the table below. For more detail on how these relate to the indicative timescales of the construction and operation of Gate One and Gate Two, please refer to Chapter 7: *Land use and socio-economics* (document reference 6.1.7).

Table 7.4.2 Assessment years for socio-economic effects

Potential effect	Assessment year(s)
CONSTRUCTION EFFECTS	
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 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
OPERATIONAL EFFECTS	
Potential effects associated with net additional employment (including indirect and induced	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)
effects, and characteristics of jobs generated by the project)	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 relating to theme parks	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 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	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

7.4.4 The effects listed in this appendix follow the same order as the effects presented in Chapter 7: *Land use and socio-economics* (document reference 6.1.7). As noted in the chapter methodology, some effects are assessed at multiple geographies, receptors or assessment years, resulting in a combination of significant and non-significant outcomes for one effect. For such effects, all significant and non-significant outcomes have been detailed in the chapter, and this appendix only presents effects that are entirely non-significant.

NON-SIGNIFICANT EFFECTS

NON-SIGNIFICANT CONSTRUCTION EFFECTS

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

Total construction workforce

7.4.5 The construction of the London Resort will support construction employment on-site, offsite throughout the supply chain in all phases of construction. The construction period is expected to create opportunities for a range of small and large businesses.

7.4.6 Appendix 7.8: *Construction Workforce Accommodation Strategy* (document reference 6.2.7.8) provides more detail on construction job estimates, potential skillsets, proportion of non-home-based workers, embedded onsite mitigation options and resulting strategy. That document should be referred to for more detail and justification, this section summarises the key findings.

7.4.7 This effect is assessed based on an estimate of the number of jobs created during the construction of the London Resort. The estimate has been calculated using an industry standard method of dividing the construction cost by the average output of a construction worker in the area, adjusted to reflect the large proportion of offsite construction which is envisaged given the specialist nature of elements of the construction.

7.4.8 The analysis of employment estimated to be generated during the demolition and construction period has only assessed the effect of the direct construction jobs supported by the London Resort. This is because any indirect and induced impacts would be felt over a larger geographical area and would only be temporary. Set in that context, they would be unlikely to result in any significant socio-economic effects.

7.4.9 The construction will require specialist and highly skilled contractors and is anticipated to utilise considerable offsite construction. For example, it is expected that much of the Leisure Core, particularly the themed rides and attractions, would be constructed off-site but assembled on-site using specialist workers.

7.4.10 The estimated job creation supported both on-site and offsite as a direct result of the construction of London Resort is estimated and presented in the table below. The on-site and off-site breakdowns relate to where the work would be done, and so the work carried out offsite is captured in the offsite job estimates, and work done on-site will be within the on-site estimates. In the example above, the ride's construction would be included in the offsite estimates, but its assembly would be included in the on-site estimates. The figures are therefore intended to capture estimates of the maximum numbers of jobs that would be required both on-site and offsite, at different points in time.

7.4.11 The disaggregation of construction activities between different elements and between on-site and off-site elements is not yet fully known, and so low and high scenarios are

presented. The low scenario for the on-site workforce requirement aligns with the high scenario for off-site workforce and vice versa.

Table 7.4.3 On-site and offsite construction employment supported by London Resort

		Gate One		Gate Two	
		Low	**High**	**Low**	**High**
On-site job years	**Total**	6,600	9,900	2,700	4,100
	Average per year	2,600	4,000	900	1,400
	Peak (year)	3,300	5,000	1,100	1,700
Offsite job years	**Total**	9,900	6,600	4,100	2,700
	Average per year	4,000	2,600	1,400	900
	Peak (year)	5,000	3,300	1,700	1,100
Total job years	**Total**	16,500		6,800	
	Average per year	6,600		2,300	
	Peak (year)	8,300		2,800	

Note: one job year is defined as full time employment for one person for one year

7.4.12 The estimate is that the construction of London Resort would support an estimated 23,300 job years. This equates to approximately 2,330 FTEs created during the construction of the London Resort. However, whilst this is helpful in considering the economic scale of impact, the FTE measure is not very informative in terms of understanding actual numbers of construction workers required on site or off site at any given time and so is not used in assessing significance.

7.4.13 These job years would be split between an estimated 16,500 supported during the construction of Gate One and 6,800 during the construction of Gate Two. Alternatively, this equates to between 9,300 and 14,000 job years supported on-site and between 9,300 and 14,000 job years supported offsite.

7.4.14 It is estimated that 6,600 – 9,900 job years will be supported on-site during the construction of Gate One and 2,700 – 4,100 job years on-site during the construction of Gate Two. An estimated further 6,600 – 9,900 job years will be supported offsite during the construction of Gate One and 2,700-4,100 offsite during the construction of Gate Two.

7.4.15 The construction period lengths are likely to be different for Gate One and Gate Two. Due to the condensed construction period for Gate One, it is estimated that a peak construction workforce of between 3,300 and 5,000 is expected to be broadly constant from mid-2022 to mid-2024, and so 2023 is assessed as the peak construction year in this assessment. The range presented reflects the uncertainty modelled surrounding the extent of offsite construction. The slightly longer construction period and lower overall construction activity associated with Gate Two means that the peak on-site workforce is only anticipated to be between 1,100 and 1,700. The likely construction profile for Gate Two is less well developed at this stage and so these estimates are likely to evolve,

although the peak figures presented are appropriate for assessment purposes.

Potential non-home-based construction workforce

7.4.16 According to the Construction Industry Training Board (CITB), in 2018/19, 5% of UK construction workers required temporary accommodation.[3] At the regional level, the figures were 7% of South East construction workers, 5% for Eastern Region workers and 10% for London workers. However, the CITB does not explicitly consider how this reliance on non-home-based workforce varies by the size of a project. For its third runway project, Heathrow Airport Limited[4] doubled the London rate of 10%, to estimate that a fifth of workers would require temporary accommodation. However, the construction of London Resort will be extremely specialised due to a large component of theme park ride manufacture. It is therefore likely that the labour market could need to source from further afield in order to meet the labour demand, which would potentially increase the proportion of non-home-based workers. Other specialised projects such as Wylfa, Sizewell C, and Hinkley Point C estimated that 77%, 75% and 66% of workers (respectively) would be non-home based.[5]

7.4.17 The proportion of non-home-based workers is also driven by the accessibility of a site and the proximity of the labour force. Given that the site is considerably more accessible than Wylfa (Anglesey, Wales) and Hinkley Point C (Somerset coast), the proportion of non-home-based workers for this project will likely be smaller than these schemes, but higher than that estimated for Heathrow.

7.4.18 Considering the above benchmarks and based on the experience of the Applicant's construction lead, it is provisionally estimated that between 25% and 50% of workers would require some form of temporary accommodation, equating to a maximum of 2,500 workers at peak of the construction of Gate One and 850 in 2028 for Gate Two. This is expected to be a conservative estimate of the number of non-home-based workers and associated impact on healthcare and the housing market.

Assessing the effect of employment generation

7.4.19 For the construction of Gate One, it is estimated that the peak requirement for home-based workers (50% - 75%) will therefore be between 2,500 and 3,750, and for Gate Two it will be between 850 and 1,275. It is anticipated that these will commute from across the LCA. The peak requirement for total construction workforce is an estimated 8,300 which will be split between on-site and offsite, non-home-based and home-based. It is therefore anticipated that these will be sourced from across the UK. It is likely that some of the offsite construction will be sourced from abroad, due to the specialist nature of some elements of construction. Further work is programmed to assess the potential scale

[3] CITB, Mobility and Skills in the Construction Sector, 2018/19

[4] Heathrow Expansion, PEIR Chapter 18: Socio-economics and employment, 2019

[5] Wylfa Newydd Project, 2016, Construction Workers Accommodation Strategy; The Sizewell C Project, 2020, Accommodation Strategy; EDF Energy, 2011, Hinkley Point C Draft Accommodation Strategy

and impact of this.

7.4.20 The effect of the home-based workers is assessed on LCA residents. The assessment considers whether this increase in employment could put additional pressure on the labour market which could increase construction and supply chain costs ultimately impacting adversely. It concludes that it is possible, in part due to the scale of other development underway in the study area, but it also shows that the labour market is large and statistics on the availability, mobility and turnover of construction workers tend to indicate that there is some capacity to support this work. The nature of the construction industry is that workers do move between projects regularly. The LCA also has a large available construction workforce. Despite there being significant construction planned and contained within the cumulative schemes, the future baseline quantified the scale of construction workforce required for the cumulative schemes, showing that they (at the relevant 2023 peak year) would equate to just 1.7% of LCA's construction workforce. This was factored into the assessment of the sensitivity of the future baseline construction workforce.

7.4.21 In the peak year (2023) the London Resort will require an estimated peak onsite home-based workforce of 2,500-3,750, commuting from across the LCA. Whilst this is a substantial quantum for one scheme, the scheme is located in an area accessible to a large construction workforce. This equates to just 0.7% of the LCA's construction workforce. Overall, due to the reasons described above about the size of the construction workforce and the evidence on availability, mobility and turnover of construction workers, the provision of job opportunities are expected to be a net benefit for residents of the LCA. The magnitude of the impact is low. The effect of the 2023 peak home-based workers on LCA residents who work in construction is therefore found to be a **minor beneficial** effect (**not significant**).

7.4.22 The effect of the total peak workforce requirement is assessed on businesses at the national level. The magnitude of the impact in 2023 (peak construction year) is expected to be **negligible** (low sensitivity receptor). This results in a temporary effect which is **negligible** at the national level (**not significant**). Given the fact that some construction workers may be sourced from abroad, the significance of this effect is unlikely to increase.

Potential temporary effect of the construction workforce on local healthcare

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

7.4.24 Typically, individuals register with GPs close to their place of residence. It is expected that there will be approximately 2,500 workers staying on-site in provided accommodation (see paragraph 7.4.35). At the ratio of 1,800 patients to 1 GP FTE presented in the baseline, this is expected to result in demand for 1.4 GP FTEs. However, many of these on-site

workers are expected to go back home at the weekends, and so would not likely register local to the site.

7.4.25 Since January 2015, however, GPs have been allowed to accept patients who are living outside of their practice boundaries, although it is for the practice to decide whether this is appropriate. A GP can refuse to accept patients because:

- it has no capacity to take on new patients;
- it is not accepting patients that do not live within its practice boundary; and/or;
- it is not appropriate for an individual to register with a practice that is a long way from where they live.

7.4.26 This means that construction workers could, if permitted by the practice, register with a local GP.

7.4.27 Given the factors above enabling GPs to refuse to accept new patients, coupled with the significantly high patient to GP ratio in the CIA, and taking into consideration that construction workers are temporary, it is deemed unlikely that they would seek to register with local GPs. Were they to do so, however, they would place additional pressure on an already highly sensitive and constrained receptor.

7.4.28 Finally, relating to both on-site and commuting workers, the construction periods are very short at approximately three years each. Many of the workers will not be working at the site for the whole period, but instead contracted for shorter periods. Therefore, it is far less likely that there will be a high demand for re-registration from the temporary workers.

7.4.29 Accidents in construction occur at a greater rate than other sectors. Between 2016/17 and 2018/19, an annual average of 2.4% of construction workers in Great Britain were injured at work, compared to 1.7% of workers injured across all injuries. Applied to the peak workforce, this would mean 135 injuries in 2023 and 46 in 2028. Compared to the future baseline of A&E attendances (which includes cumulative schemes), this equates to an increase in attendances of 0.10% in 2023 and 0.03% in 2028.

7.4.30 The Project Site would be managed in line with best practice and all efforts would be made to reduce the risks of accidents. There will be an on-site medical facility for accidents and sickness, appropriately resourced with fully qualified personnel. The facility will be open for all working hours, with any requirement outside these hours covered by the NHS. The facility will enable first aid to be rendered to workers if they are injured or become ill at work. In addition to the treatment of minor injuries and ailments, the facility would provide preventative healthcare. In the event of any major incidences, the on-site medical team will provide first aid and the local emergency services will be called to take any seriously injured workers to hospital.

7.4.31 The facility will be constructed in time to ensure that services are in place before the workforce arrives. If required, temporary arrangements would be put in place for any

number of workers that would be present before the construction of the facility. The facility will be clearly signposted throughout the site and will be easily accessible.

7.4.32 Everyone working on-site would go through a health and safety induction process before they are allowed to commence work on the site. This induction training will concentrate on health and safety factors specific to the site and will be given by appropriate personnel nominated by the employer. A programme of health and safety training throughout the project will be implemented. There is also a requirement for a proportion of the workforce to have a first aid qualification.

7.4.33 Through consultation with the Kent and Medway CCG, the importance of collaborative planning was highlighted. For example, directing temporary onsite construction workers to use online GP services would enable them to access any needs for regular prescriptions, as well as reducing potential impacts upon local services. Similarly, working collaboratively with the CCG to assess what the onsite facility should include. The Applicant is committed to ongoing engagement with the CCG and collaborative planning.

7.4.34 The magnitude of the impact in 2023 (peak construction year) is expected to be negligible (high sensitivity receptor). This results in a temporary effect which is **minor adverse** at the CIA level (**not significant**).

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

7.4.35 The non-home-based construction workers may have an effect on the local housing market. The assessment years for this effect are 2023 (peak construction workforce) and 2028 (peak construction workforce for G2 coinciding with the opening of Gate One, placing competing demands on the local housing market and accommodation stock).

7.4.36 It is assumed that between 25% and 50% of non-home-based workers would require local accommodation, equating to a maximum of 2,500 in 2023 and 850 in G2. This is likely to be a conservative assumption as it is significantly above the national and regional averages, and close to the proportion required for Wyfla and Hinkley Point C. These are both in considerably less accessible locations than the Project Site, which, as outlined in the baseline, has access to a large labour catchment. Construction workers for cumulative schemes in the area are expected to increase demand, estimated to be 500 in 2023 and 170 in 2028. This gives a combined non-home based workforce (the London Resort and cumulative schemes) of 3,000 in 2023 and 1,000 in 2028.

7.4.37 Since non-home-based workers are unlikely to want to commute far to get to work, it is expected that the majority will seek accommodation within a smaller catchment. This assessment considers existing room capacity within the CSA. This is a further conservative assumption of the impact at the CSA level as it is possible that some may stay outside of this area.

7.4.38 The combined non-home-based workforces of the London Resort and cumulative schemes will be relatively small in the context of the population of the CSA: the future baseline

forecasts that there will be 409,000 CSA residents in 2023 and 424,00 in 2028. The workers will equate to an uplift of 0.6% in 2023 and 0.2% in 2028 populations.

7.4.39 The baseline concludes that the CSA existing accommodation market is constrained, with a total supply of 5,400 available and affordable rooms across tourism, PRS and OOS. Of the total available and affordable rooms, 76% is within the PRS. Given uncertainty over delivery of future stock, the effect is conservatively assessed against existing stock levels. The additional demand from the workers would place huge constraints on this available stock in both assessment years and would be highly reliant on the PRS sector. In the based workers. For Gate One, this includes a cruise ship with 1,000 to 2,000 spaces to be docked at Tilbury, with room for a second ship if required and space for 500 – 700 mobile homes on the Gate Two site. For G2, the cruise ship will remain and there is further space for mobile homes at Tilbury if required.

7.4.40 Overall, after allowing for embedded mitigation the magnitude of impact is expected to be low. On a medium sensitive receptor, this results in a **minor adverse** effect for homes and residents in the CSA in 2023 and 2028 (**not significant**).

7.4.41 Appendix 7.8: *Construction Workforce Accommodation Strategy* (document reference 6.2.7.8) provides more information of on the effect of the non-home based workforce on the accommodation market.

Displacement of residential dwellings as a result of property acquisition

7.4.42 The Applicant would acquire 19 London Road in order to enable construction of the visitor centre and also to create a pedestrian entrance to the Resort via Pilgrims' Way. The assessment year for this effect is 2022; the earliest date at which this displacement could take place, although it is noted that the impact is expected to reduce in the years following this as the residents become settled in new accommodation. The dwelling displacement effect is assessed at the Dartford housing market level.

7.4.43 The baseline found that the Dartford housing market had a high sensitivity to dwelling displacement effects. The displacement of three dwellings will decrease existing Dartford stock by 0.01% and equates to 0.06% of the future identified requirement in the five year housing supply (2019-2024). The deliverable sites over this period are at 113% of the identified requirement, so the borough will still be at over 100% requirement after the displacement.

7.4.44 Overall, whilst the impact will be material for the residents of the three dwellings concerned, the magnitude of impact is expected to be negligible at the Dartford level. On a high sensitivity receptor, this results in a **minor adverse** effect at the Dartford housing market level in 2022 (**not significant**).

7.4.45 The mitigation section at the end of this chapter presents the Property Compensation Policy.

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

7.4.46 The London Resort DCO limits overlap with areas allocated for housing:[6]

- Station Quarter South, over which would run the London Resort Access Road (alongside the existing HS1 line). SQS has maximum consent for 1,390 homes in the Ebbsfleet Development Framework 2017); and

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

7.4.47 The London Resort will provide some on-site accommodation for staff (500 units for up to 2,000 staff, with an estimated occupancy of 1,800) and hotels for visitors, but no market housing would be provided. The land take of the London Resort could therefore impact housing delivery. However, it is unclear to what extent housing will be inhibited in these areas. The true counterfactual is not the lost housing allocation in the areas, but the likelihood that any housing would have been delivered in the area in the absence of the London Resort. As discussed in the effect of employment and visitors on housing delivery (paragraphs 7.323-7.356 in Chapter 7: *Land use and socio-economics* (document reference 6.1.7)), the EDC has been historically challenged in meeting its housing delivery targets.[7] Indeed, in Dartford's five year deliverable sites plan (Diagram 7.3.18 in Appendix 7.3: *Detailed Baseline* (document reference 6.2.7.3)), the area has no units allocated to the location. It is understood that the EDC is focusing on delivery at other allocated sites. They are also looking to rebalance the existing planning permission towards a higher residential content which will mitigate any loss of allocated land or delay of residential to some extent. Therefore, despite the maximum parameter housing allocation by the EDC, it is likely not the case that this many homes will be 'lost'.

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

7.4.49 Based on the land take of the access road (including a generous buffer to account for the land that is required permanently around it and a further buffer for potential undevelopable land between roads), it is estimated that 13.7% of Station Quarter North and 15.0% of Station Quarter South would be lost permanently due to the land take of the London Resort. This is a low proportion of the land and it is far from definitive that this would directly result in a reduction in housing delivery on the remaining land. However,

[6] EDC, 2017, Ebbsfleet Development Framework

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

even if it did result in a reduction in housing delivery proportionate to the land taken by the roads, this would only reduce housing delivery by less than 350 homes. Given the London Resort itself is providing onsite accommodation of 500 units (whilst not like for like in terms of market housing), this would more than offset any loss of housing delivery. The combination of a low disruption to the allocated sites, minimal actual land take, coupled with the fact the EDC masterplan is actively evolving with a view to intensify residential delivery and is not actively focusing on these sites in the short term, suggests that the London Resort is at worst case only likely to slightly impair/delay housing delivery, and in reality not likely to materially adversely affect housing delivery here at all.

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

NON-SIGNIFICANT OPERATIONAL EFFECTS

Potential effects of visitor and worker expenditure

7.4.51 This section assesses the impact of expenditure from visitors to and workers at London Resort. The visitors who do not stay on-site at the London Resort will spend money on accommodation, food and retail/entertainment in the area near where they stay. Similarly, the Resort's workforce would be expected to spend some of its income locally. The London Resort will provide 500 units for worker accommodation to be delivered in phases, with 250 to be built by phase one. These are conservatively expected to be at 90% capacity. This equates to 900 workers living on-site in 2025 and 1,800 workers living on-site from 2029 who, as new residents to the area, will spend on consumer goods and services.

7.4.52 Appendix 7.9: *Retail and Leisure Impact Assessment* (document reference 6.2.7.9) provides detail over the methodology for estimating expenditure in the CSA by visitors and workers. The assessment concludes that the effect of the visitors spend will be positive but, in the context of existing turnover in the study areas, negligible.

7.4.53 These estimates are deliberately conservative to provide a reasonable worst case assessment of the London Resort.

7.4.54 The magnitude of impact associated with the additional worker and visitor spend is expected to be **negligible** in 2025, 2030 and 2038 (high sensitivity receptor). This results is a permanent effect that is **minor beneficial** (**not significant**) at the CSA in 2025, 2030 and 2038.

Potential effect of workers and visitors on healthcare provision

7.4.55 The impact of London Resort upon demand for health services would result from workers (including those living onsite) and visitors. This section considers the effect of these on GP

and A&E demand, as well as wider health and social care services, including mental health and acute services. Whilst these latter effects have not been quantitatively assessed in this chapter due to data unavailability, they are considered in the assessment of the magnitude of impact.

7.4.56 Visitors are not expected to place additional burden on primary healthcare, as they are not expected to register with a local GP.

7.4.57 The London Resort will provide on-site worker accommodation in phases, with 250 units by 2025 and 500 from 2029. Each unit will have 4-5 ensuite bedrooms. There will be a maximum overall capacity of 2,000 from 2029. It is assumed that these units will be at 90% occupancy, meaning there are expected to be 900 on-site resident workers in 2025 and 1,800 from 2029. It is likely that the workers living on-site will seek to register with a GP close to the site. At the recommended benchmark set by the Department of Health and Social Care (DHSC) of 1,800 patients per FTE GP,[8] these workers would create demand for 0.5 additional FTE GPs in 2025 and one additional FTE GP at the CIA level.

7.4.58 During consultation with the Kent and Medway CCG, the possibility for building on recent innovative methods of delivering primary healthcare was highlighted. For example, directing onsite workers to use online GP services would enable them to access all required services as well as reducing potential impacts upon local services. The Applicant is committed to ongoing engagement with the CCG and collaborative planning.

7.4.59 For the other workers not living on-site, the GP impact is less clear. It is possible to register at a GP near to a person's workplace (the CIA). As explained above, however, GPs can refuse to let them register for a variety of reasons, one being a lack of capacity. Given these factors enabling GPs to refuse to accept new patients, coupled with the significantly high patient to GP ratio in the CIA, it is deemed unlikely that many workers would seek to register with local GPs. During consultation, the CCG did not view this indirect impact of the London Resort's workers on GPs as a significant issue.

7.4.60 Considering new A&E demand, visitors who become unwell or develop minor injuries will be dealt with on-site by the first aid provision at the Medical Centre. Major incidents that cannot wait until the patient has returned home are more likely to have a more significant impact on local emergency care provision. The International Association of Amusement Parks and Attractions (IAAPA) surveyed 171 parks in North America and found that there were 1,171 ride related injuries in 2017. This equated to 3.9 injuries per million theme park attendances. Factored by the estimated attendance at the London Resort, it is estimated that there could be 25 ride related injuries in 2025 and 50 in 2038 which might require A&E services.

7.4.61 Workplace accidents also occur. Applying the national accident rate at work across all industries (1.7%) to all gross additional workers, it is estimated that there would be 130 injuries in 2025 and 270 in 2038. However, this is an overall injury rate, rather than an estimate of injuries requiring A&E. Many of these injuries will be dealt with onsite by the

[8] NHS London, 2009. HUDU Planning Contribution Model Guidance Reports.

first aid provision at the Medical Centre.

7.4.62 Finally, the workers living on-site may have accidents outside of working hours. There were 12m A&E attendances across England in 2018 by working age residents, equating to 0.35 visits per resident. It is estimated that there would be approximately 310 additional A&E attendances in 2025 and 625 in 2038 associated with the residents at the on-site accommodation. However, many of these will be able to be treated onsite.

7.4.63 The CCG agreed that the analysis outlined in this chapter is detailed and robust and agreed with the effect significance. Their key concern is limiting unnecessary A&E trips. It is acknowledged that some A&E trips will be necessary where there is a serious injury but any measures to reduce trips to A&E would be vital. The CCG noted that the onsite facility will help but suggested alternative solutions to minimise the impact on A&E services. Some potential options noted included working collaboratively with the EDC and video links to the A&E. The Applicant is committed to continued engagement with the CCG. Based on this commitment and the conclusions of the CCG and the analysis above, it is expected that the likely effect on A&E will be mitigated and immaterial.

7.4.64 The Security Planning Report outlines the ways in which the London Resort will mitigate against major incidents. These include providing collaborative facilities for use by emergency services and ensuring clear communication with members of the public providing information on what to do. During consultation, NHS England noted that the nearest hospitals are not large, so care should be taken to avoid straining local providers. The project team noted that this will be taken on board for both routine activities including care of staff living on site as well as during accidents and major incidents. The London Resort will contain a helipad for emergency use in the rare event of a major emergency incident.

7.4.65 Public service providers have a statutory duty to serve the public wherever they choose to live and work. Demand arising from new workers to the area should therefore, to some extent, be met by reallocation of resources. Most services are funded through central or local taxation and should therefore be able to respond and absorb additional demand when it arises. *The Economic and Regeneration Statement* (document reference 7.5) explains that the London Resort will generate significant tax revenue, which will help to increase resources at the locations where there is more demand, thereby largely offsetting the impact.

7.4.66 Overall, given the conclusions of the CCG, the commitment of the Applicant to ongoing collaborative working with the CCG, the statutory duty for public health providers to serve the health needs of the public, and the increase in tax base created by the London Resort, it is expected that the London Resort will have a negligible magnitude of impact upon healthcare (high sensitivity receptor) in all assessment years. This would result in a **minor adverse** effect (**not significant**) upon healthcare in 2025, 2030 and 2038.

Potential effect of workers and visitors on other public services

7.4.67 No public services infrastructure falls within the PSB, hence there is not expected to be

any direct impact upon public services being diminished or displaced due to the London Resort.

7.4.68 In terms of demand for education, visitors are not expected to generate any additional demand for education services. Additionally, the 1,800 workers living on-site are not expected to bring any families with them and so are not expected to increase demand for education.

7.4.69 The additional workers and visitors may increase demand for emergency services within the CIA. This is partly covered by the healthcare effect above, which found a minimal additional demand for A&E services from both workers and residents.

7.4.70 The London Resort may also increase demand for fire, ambulance or police services. However, as discussed above in the context of health effects, any demand for public services is expected to be offset by the increased tax base supported by the London Resort. This adjustment will happen as providers are bound by their statutory duty to supply sufficient resources for their residents and workers. In this way, public services will respond to the changing population and absorb new demand.

7.4.71 The Security Planning Report outlines the ways in which the London Resort will mitigate against major incidents. During consultation, NHS England highlighted the prioritisation of access by all first responders (medics, fire rescue and police) which has been taken on board by the project team. All these measures aim to minimise the overall impact of the London Resort on these services, which will be well prepared to enact plans in the case of an emergency. The London Resort will contain a helipad for emergency use in the rare event of a major emergency incident.

7.4.72 Overall, the impact on public services is expected to be of negligible magnitude (medium sensitivity receptor) in all assessment years. which would result in a **negligible** (**not significant**) permanent effect in 2025, 2030 and 2038.

Potential effect on local retail and leisure, including town centres

7.4.73 The London Resort is expected to attract a large number of visitors, many of whom will spend on accommodation, retail and F&B in the CSA. There will also be a large number of workers who will all spend in the CSA. Finally, the London Resort will provide on-site accommodation for 900 workers in 2025 and 1,800 from 2029. It is expected that these will all spend on consumer goods and services in the CSA. These impacts are estimated in detail in Appendix 7.9: *Retail and Leisure Impact Assessment* (document reference 6.2.7.9).

7.4.74 On the other hand, the spend opportunity at the London Resort has the potential to divert trade from other retail and leisure businesses, in the CSA and further afield. It is important to recognise that the offer at the London Resort will be completely new and different from anything that currently exists in the CSA. In this way, it is not anticipated to be a direct competitor and is not expected to result in trade diversion from existing businesses. As described in this chapter, it is far more likely that the spend would be additional. However,

it is possible that CSA residents (and residents further afield) might, rather than spending in a CSA retail or leisure business, choose to instead spend at the London Resort. This could have a knock on effect for the long term viability of the existing retail and leisure businesses in the CSA.

7.4.75 The offer at the London Resort is split into two parts: inside and outside the payline. Given that the offer outside the payline will be accessible to the public, it has more direct potential to divert trade. Appendix 7.9: *Retail and Leisure Impact Assessment* (document reference 6.2.7.9) quantifies these trade diversion impacts as a result of the offer outside the payline. This assessment is highly conservative because it assumes that the London Resort has potential to divert trade from existing centres when in reality the offer is so distinct that this is not expected.

7.4.76 Appendix 7.9: *Retail and Leisure Impact Assessment* (document reference 6.2.7.9) compares the net impact (ie the additional visitor and worker expenditure less of trade diversion) to future turnover. The impacts are calculated across different types of retail and leisure, and across several geographies (Dartford and Gravesham, the CSA and local centres). The assessment concludes that the London Resort will be a positive investment for the CSA. The offer will diversify the use mix of both existing and planned investment in the area and provide a distinct offer that will not compete with existing retail and leisure. The following provides a summary of the worst case effects across different types of retail and leisure.

7.4.77 At the wider Dartford and Gravesham level, comparison retail is expected to experience a small net positive impact on turnover. Convenience retail is expected to experience a negligible impact. F&B is expected to experience the largest negative impact, though it is still not considered significant. Cinemas, theatres and music venues are expected to experience small negative impacts. The assessment then estimates impacts at individual centres at the Dartford and Gravesham geography. At the centre level, Bluewater was found to have the largest net impacts for retail and F&B. Overall, however, no significant adverse effects were identified, even in this most conservative assessment. Given impacts at the CSA level are smaller than at the Dartford and Gravesham level, it can be inferred that there will be no significant adverse impacts on centres at the CSA level.

7.4.78 Appendix 7.9: Retail and Leisure Impact Assessment (document reference 6.2.7.9) also quantifies the turnover within the payline that CSA residents might spend on ticket prices, retail and F&B. This was estimated to be £1.4m in 2025, £1.8m in 2030 and £2.1m in 2038. As explained in *the Economic and Regeneration Statement* (document reference 7.5), much of this spend is expected to be additional as the London Resort is unique to the UK. There may be some diversion from other UK leisure/holiday spend but the majority is expected to be additional and hence the diversion impact is not estimated here.

7.4.79 The visitor expenditure will also have further benefits. As evidenced by the experience of Disneyland Paris, there is also the possibility of visitors making linked trips in the local or sub-regional area which would further increase the level of expenditure induced by the tourism associated with the London Resort. This spending will create additional activity in the CSA through spending on accommodation, leisure and retail, as well as in wider Kent,

Medway and Essex, and London. This might include increased demand for complementary uses near the Project Site. New hotels and restaurants might be built and co-locate near the Project Site to benefit from the additional visitors and economic activity supported . The London Resort is working with Visit Kent and South East LEP on maximising the visitor experience and ensuring the potential for linked trips.

7.4.80 The expenditure forecasts used in this assessment utilise ONS population projections. As explained in the baseline, these estimates have been sense checked against the Ebbsfleet Garden City (EGC) proposals and are considered consistent with the scale of delivery. That is to say, the spend impacts here assume that EGC is delivered. It is known that these EGC targets are high and that delivery has been historically challenging. As the housing effect discusses, the London Resort would attract new workers and visitors to the area. Whilst this would create higher demand pressures for housing (as described in the housing effect above), it would also generate additional spend from workers (including those living on site) and visitors, benefitting local town centres. There is therefore an interaction between the effects on retail and leisure and housing. Whilst both effects assess a reasonable worst case, the interaction means that both worst cases cannot eventuate. The reasonable worst case assessment for the housing effect assumes that more people move into the area which would create demand for retail and leisure over and above what has been assumed for this effect.

7.4.81 Overall, the net spend impacts from the retail and leisure offering at the London Resort are not expected to result in significant adverse impacts across any type of retail/leisure or centre in the CSA. The London Resort is a unique proposition and will be distinct from other retail and leisure and is not expected to result in significant trade diversion. As such, this assessment provides a conservative assessment of the London Resort on local retail and leisure and still finds that the effects are not significant. Indeed, the North Kent SHENA reports that health check assessments in Gravesham (and Medway) identify that many centres in Gravesham and Medway have a relatively limited commercial leisure offer at present, indicating that there is capacity for additional leisure. The report states that they would not expect the opening of the London Resort to particularly dilute any demand for additional commercial leisure provision in the centres in Gravesham and Medway as the catchments and users of the destinations are likely to be different. Additionally, the London Resort is expected to retain CSA resident spending which is additional or leaked out of the CSA. The interaction with the housing effect means that there is the potential for even greater spend benefits, but these have not been assessed as part of the worst case. Finally, the potential for linked trips and associated development has not been estimated here to be conservative but have the potential to increase benefits even further.

7.4.82 Taking all the above into account, it is conservatively deemed that the London Resort will have a negligible impact on retail and leisure centres in the CSA in all assessment years. On a high sensitivity receptor, this results in a **minor adverse** effect (**not significant**) in 2025, 2030 and 2038.