Appendix TA - E

KENT COUNTY COUNCIL CONSULTATION RESPONSES

External Comments					WSP
Comment From	TN	Section	Statement	Comment	Comment
KCC	1	General	Recommended update Appendix A and trip rates from RD&E and hotel elements to most recent version of TRICS.	Visitor and staff numbers for the theme park have been provided by consultants Profun and LDP. WSP have, however, validated the back of house, RD&E and hotel elements using person trip rates from TRICS. This is presented in Appendix A of TN1. The TRICS exercise was undertaken in 2017 and has not been updated. It is recommended that it is updated using the most recent version of TRICS. As an example, using the search criteria listed for hotels, it is noted that on TRICS v.7.7.1 there were three more recent hotel sites surveyed.	TN1 proved that TRICS was not a suitable source for calculating the trip generation for this unique development. The TRICS information supplied was intended to provide a high level review of the potential trip generation that could occur if you were to apply trip rates to some of the individual components of the London Resort. This was completed in 2017 and as outlined in the Appendix it was acknowledged that the individual land use have not taken in to account the potential of linked trips between services and therefore it is likely to over-estimate the trip generation associated. The proposals have changed since the analysis in 2017 and it was included to provide an indication of the likely trips should an alternative methodology is applied. It is not considered that TRICS is able to accurately predict the large scale multi use developments such as an international leisure resort. This simply reflects the uniqueness of the proposals and that there is limited comparable data that can be used without applying numerous unsubstantiated assumptions. As can be expected, the cross visitation and visitor forecasts in a resort such as the proposals is not a simple exercise or the result of an application of a singular percentage. The visitor information provided by ProFun and LDP is based on existing theme parks and is considered more appropriate than individual TRICS sites with or without any further adjustments. It is not considered appropriate or proportionate to undertake a further review of TRICS at this stage, as the TRICS database does not have a comparable site within in that would allow for a comparison. No sites within the UK have the combination of travel options that is available for The London Resort and it is considered appropriate to use the forecasts developed by the experts in these types of large scale world leading entertainment sites. ProFun and LDP are both industry experts and have provided necessary data to profile visitors and staff throughout the various years and assessment days. If Highways England have specialists in this field, then they would be happy to discuss directly as well. Furthermore, ProFun have now provided the required information to support the Back of house, RD&E and hotel elements. Principles of the TN still apply despite land uses / SQM changes and the over-arching conclusion will not change
KCC	1	General	What proportion of hotel guests will not visit the resort?	With regards to hotels, what proportion of hotel guests do not visit the Resort? Presumably this will apply to some conference attendees? What about other non-conference days?	Everyone staying on-site is associated with the Resort and is all included in the forecast numbers. ProFun arrivals/departures to the leisure core already take account of where people are going (i.e. theme park or conference in hotel). The TA that will be submitted will include an explanation of this. LDP physical planning document (attached to this submission) also details that all hotel guests visit an anchor attraction and all overnight MICE guests are already captured in attraction numbers.
KCC	1	Tables 2-4, 2-5, 2-6	Inconsistences in visitor numbers on 85th percentile day. Replicated from SATD but inconsistencies suggest calculation errors. Errors in 2025 and 2029 only.	Tables 2-4, 2-5 and 2-6 in TN1 show the visitor numbers for the 85th percentile, peak day, peak weekday and average day. These tables are replicated in the SATD as Tables 9, 10 and 11. However, there are inconsistencies suggesting calculation errors. For 2025, the average daily total is different between Table 2-4 and Table 9. For 2029, all the daily totals are different between Table 2-5 and Table 10, the difference appears to be because the hotel numbers are different. For 2038, Table 2-6 and Table 11 are identical, so the errors appear to be related to 2025 and 2029 only.	WSP are aware of these inconsistencies, these will be corrected for final version of the documents to be submitted as part of the DCO application
KCC	1	3.2.1		Paragraph 3.2.1. states that 'Highways England have agreed to share modelling outputs from both the A2 Bean Ebbsfleet (A2BE) traffic model and the Lower Thames Crossing Area Model (LTAM).' A further Technical Note is included at Appendix B. How are you proposing to allow for development not included in LTAM e.g. Medway which might have significant implications along the A2 corridor? It is understood that the outputs will be used to create a spreadsheet traffic model which will then be fed into a microsimulation model and that this methodology has been agreed with HE. It would be appreciated if this can be explained. Detailed discussions around this strategy will be required to ensure the highway impacts are correctly assessed. The study network will need to include local junctions where there is a significant impact. The highway authority would also recommend testing scenarios both with and without the Lower Thames Crossing, as is proposed in Appendix B. It is also worth noting that a strategic county-wide transport model is currently being developed for Kent with a validated base highway model due in August 2020 and a public transport model in November and 2035 scenario year after this. Elements of this may be useful as part of ongoing validation of the Resort modelling	Following extensive liaison and discussions with Highways England, the availability of modelling data and the sources made available to LRCH to test The London Resort has been updated. Highways England have now agreed to share the A2BE model outputs, but not information or data from LTAM. WSP are therefore only using modelling outputs from the A2BE model to develop a spreadsheet traffic model, enhanced using local count data. WSP understand that the A2BE forecast model represents the Core Scenario, as per standard modelling guidance, and therefore only includes developments that are "near certain" and "more than likely". Medway also sits outside the detailed area of modelling. WSP are assessing a scenario with and without Lower Thames Crossing. A detailed explanation of the modelling methodology is being developed and will be submitted to KCC.
KCC	1	1.3.1	Inconsistences in number of total hotel rooms. 3,550 compared to 4000 in 2.2.3 of the SATD		The correct number of hotel rooms is 3,550 and is the basis for the assessment.
KCC	1	6.1.1	It is stated that the assessment periods have been calculated for the traditional AM and PM commuter peak periods. However, the Arrival and Departure peak hours are different to those set out in the SATD.	Paragraph 6.1.1 states that the assessment periods are as follows: - AM Commuter Peak 08:00 – 09:00; - Arrival Peak 13:00 – 14:00; - PM Commuter Peak 16:00 – 17:00; and - Departure Peak 21:00 – 22:00. It is stated that the assessment periods have been calculated for the traditional AM and PM commuter peak periods. However, the above assessment hours are different to those set out in the SATD. Clarification is sought on which are the correct assessment hours along with a justification as to why the hours have been selected. The network peak hours for the weekday AM and PM peak on the local network should be established. It is also of note that no weekend assessment period is proposed as would traditionally be the case for a leisure use and also given the Resort's proximity to Bluewater. In the first instance, weekend peak traffic flows on the local network should be considered and compared to the weekday peak traffic flows. The highway authority needs assurance that the assessment provides a reasonable worst case of the impact on the local road network across both weekdays and weekends.	This will be updated and checked prior to submission. It is noted that peak arrival and departure periods are different for the assessed years/ day type scenarios. To confirm, WSP will be assessing 8-9am, 5-6pm (traditional AM and PM commuter peaks) and Saturday peak arrival. A sensitivity for the interpeak will also be undertaken.
KCC	1	Tables 6-1 - 6-20	These tables do not show servicing vehicles, which should be included in the assessment of the road network. Furthermore confirmation needed whether private vehicle includes ride share and taxis	Tables 6-1 to 6-20 of TN1 set out the resultant trip generation for the weekday 85th percentile flows for each of the above assessment periods, for 2025, 2029 and 2038. This identifies the proportion of private vehicles and coaches. It does not show servicing vehicles, which should be included in the assessment of the road network. Furthermore, it should be confirmed whether private vehicle includes ride share and taxis. Presumably drop-off and pick-up facilities will be provided for these uses? These facilities should be designed according to the predicted demand and likely increase in future popularity of ride share apps. It is noted that a proportion of servicing vehicles would be permitted access from London Road, with some using the resort road and the majority using the consolidation centre proposed at the Port of Tilbury. Any access onto London Road will need to be carefully managed, ensuring that a significant number of additional HGV's are not attracted to this part of the highway network. Details of how a servicing access would be managed and controlled are required for review.	The mode shares have been updated to include ride share/ taxis. The Resort will provide drop off facilities within the car park structures, which will be reviewed as the site develops. WSP's Future Mobility team are reviewing the changing trends in ride sharing and drop off facilities, which will be incorporated into the design assumptions. Servicing to the site will be undertaken primarily via river or off-peak between 19:00-07:00 of after 10:00-16:00,. These are therefore not included in the assessed AM and PM peak hours. The submission will include a operations management strategy setting out the proposed management.
KCC	2			Information from consultants LDP regarding forecast home origins have been used as the primary basis for assessment. Consultants Volterra have undertaken economic analysis of the catchment areas of visitors and staff, as well as the hotel distribution.	Noted. Additional information will be included in the submission supporting the data used.
KCC	2	Section 3/ General	More info needed on why the domestic/ international split of visitors changes over time and assumptions made in calculating these	The LDP forecast is that in 2025, 77% of visitor trips will have a domestic origin and 23% of visitor trips will have an international origin, evolving to 65% of visitor trips with a Domestic origin and 34% with an international origin in 2038. Why does this change overtime? Similarly, Tables 5-2 to 5-4 show the day trip / overnight split in 2025, 2029 and 2038. It shows the percentage of overnight visitors increase from 33.80% in 2025 to 45.47% in 2038. Why does the international origin increase so significantly in future years and does this account for the increase in the percentage of overnight visitors? How were these assumptions derived? There is a discrepancy with the Scoping Note which referred to 12% of overseas visitors.	LDP Technical Note on Attendance Methodology (which will be appended to the TA) provides explanation and evidence for the change in international visitor % over time, based on official statistics and projections for International Tourists tot he UK by trip purpose. Volterra provide the likelihood of overnight stay, by visitor type in their Hotel Distribution Note and as international tourists are more likely to stay overnight, and increase in the % of international tourists leads to an increase in overnight stays. Once suitable drafts are ready these will be provided to KCC.

KCC	2	Table 7-3	Principle accepted.	The methodology uses 2011 Census Journey to Work data, based on the three local MSOA's to the Resort. Given the scale of the Resort, employment is also likely to be drawn from further afield. A comparison of other large staff trip attractors has been undertaken with Westfield Stratford, Thorpe Park and Bluewater. This has refined the percentage distribution across all local authorities and the results are shown in Table 7-3. The principle of this approach is accepted.	No action required
KCC	2	7.3.3	"there is a clear different [should read difference] between the trips made by car and public transport, reflecting that car times are generally quicker."	This should be borne in mind when assessing the likely staff car trips, ensuring that inappropriate parking on local streets outside of the designated staff car park is minimised.	A parking note has been prepared that will be shared with KCC and local authorities. The note sets out how a management strategy could be put in placed to address issues that may arise following the opening of the resort. This follows a monitoring based strategy looking at key areas (both south and north of the river) and expanding sections for review / assessment should issues be identified.
KCC	3			This Technical Note provides evidence to predict a range of mode shares for visitors and staff. It is acknowledged that the London Resort is a unique proposition in the UK and there is, therefore, considerable uncertainty in accurately predicting the mode share. The approach adopted in TN3 of comparing other significant trip generators in the UK and Europe, along with consideration of local characteristics, is supported.	No action required
KCC	3	2.3.4	Appropriate mitigation for the 2038 assessment impacts of the resorts maturity needs considering.	In respect of assessing the impact on the likely key modes used to access the Resort (private vehicles and public transport), it is noted that paragraph 2.3.4 states "the 2025 and 2029 forecast years will form the primary assessment years of which the Resort will be mitigated against." However, the Resort is not predicted to reach maturity until 2038. The results of the impact assessments in 2038 will therefore also be an important consideration in determining appropriate mitigation.	It is acknowledged that a review of 2038 will be an important consideration, as such a 2038 assessment will be undertaken, however this is considered to be a sensitivity given the unknowns with the Garden City development and notably the Central area. A mitigation package will be identified setting out what could be delivered to mitigate to current assumed traffic flows, however the application will allow flexibility for the mitigation package to be revisited should this be required. This is important, as future year trends and mobility may differ to current assumptions - it is considered vital that The London Resort is able to react and make best use of mitigation strategies that match the current trends (and technologies) at the time. The use of monitoring will be set out in the Travel Plan and Events Management Plans being developed for the application.
KCC	3	Scenario 1	How are vehicle trips which are drop off trips counted? Risk of undercounting visitors.	Two scenarios are considered for determining how people may travel to the site. Scenario 1 assumes full occupation of both the visitor and staff car parks, whilst Scenario 2 is public transport focussed. In Scenario 1, it is noted that the calculations correctly separate out visitor, staff and hotel parking and include an allowance for 5% circulation space. However, how are the vehicle trips which are drop-off's including ride share and taxis taken account of? Are these trips constrained or unconstrained in this scenario? The assumption that there isn't capacity in the Resort car parks and therefore visitors won't travel by private car, risks undercounting those visitors who may instead park on local roads or at Bluewater, to then take a bus or walk to the Resort. Given that each visitor car trip is predicted to have a three person occupancy, for most journeys the private car is likely to be cheaper and therefore more attractive than public transport.	As noted above, a drop off/ Taxi mode share has been produced to remove the risk of undercounting vehicle movements. The design of the car park has incorporated significant drop off area (north and south)
KCC	3	Table 4-6	Helpful to review method of JTW data.	The mode share for staff at other attractions is set out in Table 4-6. It would also be helpful to review the Method of Journey to Work data from the 2011 census to show the existing mode share for the local area. Paragraph 4.7.9 states that "The London Resort staff car mode share will be within that range (5-40%)."	WSP are developing a Travel Plan to support the mode shares identified. The level of parking on site has been set at no more than 500 spaces, with suitable measures to support that provision.
KCC	3	Table 6-19	Need supporting details of the staff car mode share Staff Travel plan as the assumption is ambitious	Table 6-19 shows the staff car mode share is forecast to be between 14% - 26%, based on 2 person car sharing and the capacity of the 500 space staff car park. It will be controlled by staff parking permits. This is an ambitious staff car mode share, which will need to be supported by a range of sustainable travel incentives and car management measures, to be set out within a Staff Travel Plan.	The sustainable travel incentives and management schemes will be set out within the Staff Travel Plan
KCC	3	Table 7-3	Assumptions underpinning the values in the table need to be clarified.	The percentage range for each mode for staff is set out in Table 7-3. Under a scenario in which the staff car park is fully occupied and that the private vehicle mode share is as low as 14%, it is necessary to demonstrate that other modes have the capacity to accommodate all the staff trips. When taking the lower range of 14% private vehicle and the upper range for all other modes, the total staff mode share in Table 7-3 only adds up to 93%, rather than 100%. Clarification for the assumptions underpinning Table 7-3 is required. How will a 10% mode share for staff coach be achieved? It is noted that a Bluewater staff travel survey identified this proportion for staff at Bluewater, but Bluewater is served by commuter coaches and the survey is now historic dating back to 2000.	Coaches will be dependant on staff origin and demand for PT with this being an assumption of what could be delivered. WSP are undertaken a more detailed assessment of availability of Public Transport which will be used to support the assessment that will be submitted with the DCO
KCC	4		How will the design of parking accommodate the key changes of future transport?	This document sets out the relevant 'Global Megatrends' alongside the DfT's six 'key changes' for the future of transport. Of particular relevance is the likely increase in popularity of electric modes of transport; bikes, scooters and cars. How will the design accommodate these modes? What proportion of parking spaces will be for electric cars?	This will be covered within the Future mobility report which will be aligned with the monitoring strategies set out in the Travel Plan and Events Management Plan. This will allow The Resort to react appropriately to changes in technology and demand of particular modes of travel. The project is not at the detailed design stage yet, and as such the level of provision and strategy for dealing with emerging trends will be signposted within the reports. The provision is not set yet, however LRCH are committed to delivering strategies that support active travel and sustainable modes and so it is expected that any provision, e.g. car charging spaces will be higher than local guidance dictates and will be subject to demand. As the site develops, it is expected that the Car parks will accommodate different operations (e.g. if an increase in car sharing is identified then car parking spaces could be re-utilised into further dedicated sharing areas). This will be monitored and reviewed as time and the park progresses.
KCC	4	Part C	Unclear what type of day visitor numbers are drawn from when making assumptions of mode shift opportunities.	Part C of the document considers the mode shift opportunity for active modes (walking / cycling), bus services, ferry travel (Thames Clipper) and rail services. It includes estimates of the number of visitors on each mode, but it is unclear what type of day the visitor numbers are drawn from. Comments are provided on each mode in turn below. Overall – It will be essential that trips on sustainable modes are maximised and that capacity is available to cater for these trips to be made via sustainable modes to reduce the potential for a severe impact on the highway network.	The calculations have been undertaken based on 85th percentile visitor day numbers with an events management plan dealing with those peak days. The Future Mobility team are providing further analysis on the mode share shift potential, which will be included in the application material.
KCC	4	Part C	Active Travel modal shift: It is not clear where the 5% of active travel trips has been derived, further work is needed on how this mode share is achieved.	Active travel – it is stated that up to a 5% mode share for visitors could be achieved. This is based on a 5km and 10km 'as the crow flies' distance from the site. The justification for 10km is that it could include e-bikes. A 5km maximum distance is assumed for walking. All the active travel trips are from either Dartford or Gravesham. From the information provided it isn't clear how the 5% has been derived. It is stated that adequate infrastructure would need to be provided to allow visitors to safely walk and cycle, but no details are provided. Given the assumption about distance travelled and that it is a high level of assessment which doesn't consider actual walking and cycling routes or the quality of the infrastructure, further work is required using the actual pedestrian and cycle routes to demonstrate that a 5% mode share could be achieved.	Walking and cycling strategy, with the TA, will pick up on new routes and proposed. We will provide an opportunity for up to 5% of people to walk/cycle, however this will be subject to a number of factors that include time of year and weather. As noted, the traffic impact element of the assessment takes account of limited use of PT and walking/cycle and maximised car travel for a robust assessment.
KCC	4	Part C	A more detailed consideration of proposals for Fastrack and other local bus services is required to confirm the assumptions around mode share.	Bus services – it is stated that up to a 13% mode share for visitors could be achieved. This is based on an assessment of the 60 minute bus catchment to Ebbsfleet International Station. For much of this catchment, the journey time by private car is likely to be faster than the bus journey time, decreasing the attractiveness of bus services. However, the local area benefits from Fastrack which provides a frequent and faster service. A dedicated Fastrack bus link through to Ingress Park may prove attractive by minimising bus journey times between destinations served by Fastrack and the Resort. This proposal would need to be carefully designed and enforced to ensure that it doesn't encourage visitors to park on local roads or at Bluewater as an alternative to the Resort on-site parking facilities. This may require the introduction of local parking controls, which would be the subject of a separate consultation process. A more detailed consideration of proposals for Fastrack and other local bus services is required to confirm the assumptions around mode share.	WSP are undertaken refined assessment of mode shares an opportunity, however will look at the ability for the bus network to accommodate circa 13% of people to arrive by bus.
KCC	4	Part C/ 2.7.1	A copy of the analysis feeding the statement "Thames Clipper have analysed the visitor catchment for the London Resort and consider a 15% mode share could be achieved" would be welcomed.	Ferry services – It is stated that "there are proposals to extend [the Thames Clipper service] to the Swanscombe Peninsula, providing a direct service to the London Resort site. Subject to this going ahead, 15% of all visitors will be served by the Thames Water Clipper with services direct to the site." It is stated that this equates to 5,304 visitors from the 11 local authorities served by a pier with Thames Clipper services. This is a very simplistic assessment and it is highly unlikely that all visitors from the 11 local authorities will choose Thames Clipper. Paragraph 2.7.1 further states that 'Thames Clipper have analysed the visitor catchment for the London Resort and consider a 15% mode share could be achieved.' A copy of this analysis would be welcomed, since a 15% mode share appears optimistic.,	Mode share analysis being undertaken by the Future Mobility team and propensity to use modes depending on UK home origin. Thames Clipper have said they can accommodate 15%, however the assessment looks at the potential offset (onto other sustainable modes) if this is not met.
KCC	4		How is the Tilbury car park and the resultant ferry link taken account of in the analysis?	Ferry Services - How is the Tilbury car park and the resultant ferry link taken account of in the analysis? A car trip to Tilbury and then a ferry trip to the Resort will need to be captured in both the analysis of the highway network and Thames Clipper service.	Noted. This has been considered and taken account of in the analysis presented to date.

KCC	4		How will the operation of the passenger and construction ferry service of interaction be considered?	Ferry Services - Once gate one is operational the river will be used by both the passenger ferry service and the construction ferry service bringing materials in to construct gate two. The interaction of these two uses needs to be considered.	There will be a management strategy to oversee the interaction of these two services that will be kept separate, that being said, on both sides of the river they will have separate docking and management areas.
KCC	4		Of critical importance in considering public transport mode shares is to ensure that there is sufficient capacity to accommodate the potential demand from visitors and staff both on the trains and at the stations themselves (e.g. passenger areas and bus stop facilities). Staff rail trips should be added to the visitor rail trips in order to demonstrate this.	Rail services – it is stated that rail services could account for between 30% and 64% of the mode share for visitors. This is based on analysis of rail journey times, with 30% of a low estimate of visitors and 64% of a high estimate of visitors being within 60 minute journey time. Of critical importance in considering public transport mode shares is to ensure that there is sufficient capacity to accommodate the potential demand from visitors and staff both on the trains and at the stations themselves (e.g. passenger areas and bus stop facilities). Staff rail trips should be added to the visitor rail trips in order to demonstrate this.	WSP have taken staff trips into consideration, along with the capacity considerations both on-train and on platforms and concourses.
KCC	4		Greenhithe Station to be considered	Rail Services - Whilst Greenhithe Station will be promoted as the station of choice on the North Kent line, visitors and staff are likely to still use Swanscombe Station if this is a quicker or more desirable route to /from the site and should therefore also be considered.	The application will not promoting Swanscombe as an access point for visitors. It is noted that there is limited powers to stop visitors using the station, however the ticketing and associated marketing will promote Greenhithe and Ebbsfleet only with no ticketing to Swanscombe. Management of staff to limit arrival at Swanscombe
KCC	4			Rail Services - The Technical Note concludes that "As rail has the largest catchment, and includes the coverage area for active travel, bus and ferry services – it is estimated that up to 64% of visitors to London Resort can reasonably access the site by non-private vehicle." Firstly, this acknowledges that the upper range mode share for each non-car mode would not be achieved (since this would total 94%). Secondly, this analysis suggests that sufficient car parking / drop-off infrastructure should be provided to accommodate at least 36% of all visitors, which are catered for from the calculations provided to-date.	Noted, the car park area has provided significant space for drop off and taxis (circa 200 spaces). As noted above, the mode share assumptions are being progressed in greater detail to provide more refinement to those set out in Technical Note 1 (Trip Gen) and Technical Note 3 (mode share) and will be shared as soon as is possible.
KCC	4		Tabulate the multi-modal trip attraction for visitors and staff in the agreed assessment hours.	It would be helpful to tabulate the multi-modal trip attraction for visitors and staff during the agreed assessment hours and showing the total daily trips.	Where possible this will be provided. As noted, due to the two separate scenarios, focusing on the highest private vehicle use vs other sustainable modes it is not possible to provide a full matrix of visitors per mode. This is because this will vary dependent on day, season and year. To allow an assessment to be undertaken we are providing ranges to look at the possible impacts of one mode potentially being higher than the other. This range will identify the measures that may be required to support services to encourage highest potential mode share percentages.
KCC	4		Display tabulated data showing the number of vehicle trips by type for the assessment hours	Separately, tabulated data showing the number of vehicle trips by vehicle type (including private car (parking and drop-off), coach, taxi, bike, HGV's etc) for the assessment hours should be provided.	This information will be provided in the TA.
KCC	Gen		Simple summary document of all transport assessment notes to be produced.	It would be appreciated if a simple summary document of the transport assessment notes could be produced.	A summary of each of the TNs will be provided within the TA.