

# THE LONDON RESORT

## The London Resort Development Consent Order

BC080001

### Environmental Statement Volume 2: Appendices

#### Appendix 20.1 – London Resort PEIR consultation comments

Document reference: 6.2.20.1

Revision: 00

December 2020

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

Regulation 5(2)(a)

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Regulation 12(1)

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## Appendix 20.1: London Resort PEIR consultation comments – Greenhouse Gas and Climate Change

Consultee	Comment	Response
<p><b>Kent County Council</b></p>	<p>The County Council has recognised the UK climate emergency and has committed to reducing the county’s greenhouse gas emissions to net-zero by 2050. The Kent &amp; Medway Energy and Low Emissions Strategy was published in July 2020 and sets out how the County Council, in partnership with Medway Council and the Kent district councils, will respond to the UK climate emergency and drive clean, resilient economic recovery across the county.</p> <p>The County Council also recognises that climate change is already affecting Kent and has published the Climate Change Risk &amp; Impact Assessment for Kent and Medway. The report describes the changes Kent might face and the potential risks to society, economy, and environment.</p> <p>The London Resort has the potential to significantly increase the county’s emissions and will contribute to climate change if its construction, operation, and end of life are not adequately mitigated. Yet the proposed development also presents a unique opportunity to become a centre of excellence for low carbon innovation and skills.</p> <p>The County Council is very concerned that no commitments have been made at this stage to reduce construction stage and lifecycle embodied carbon, and agree that without such commitments, the greenhouse gas impact will be Major Adverse.</p> <p>The County Council supports the outline target for achieving net-zero carbon emissions from operational energy consumption but would also expect this to be expanded to include all on-site operational transport and water</p>	<p>The Proposed Development is committed to net zero carbon in operation, aligning with the Council’s policies and climate emergency commitments. See the paragraph 20.65 and the Energy Strategy (Appendix 20.3).</p> <p>Climate Change Adaptation and Resilience is addressed in Part B of this ES chapter and takes into account the Council’s Climate Change Risk &amp; Impact Assessment.</p> <p>The Economic &amp; Regeneration Statement (document reference 7.5) states the construction phase is expected to support 23,300 job years, with commitments to local sourcing of labour and products. This is complemented by the Proposed Developments’ net zero carbon in operation and wider low carbon ambitions.</p> <p>The final version of the ES includes mitigation measures for construction stage embodied carbon and lifecycle embodied carbon that reduce significance to Moderate Adverse.</p> <p>The Proposed Development is committed to 100% of on-site vehicles to be powered by electricity and only using renewable energy.</p> <p>The UKGBC definition of a net zero carbon building has been adopted,</p>

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	<p>consumption once the necessary assessments have been undertaken.</p> <p>It is requested that emissions relating to operational waste and recycling are also assessed.</p> <p>There should also be full consideration of the carbon sequestration impact from land use change, in particularly the loss of marshland.</p> <p>It is noted that an evaluation of climate change risks has yet to be finalised. The County Council suggests that the Climate Change Risk &amp; Impact Assessment for Kent and Medway is fully utilised to support this work. The County Council would welcome an opportunity to discuss matters relating to greenhouse gas emissions, energy generation and climate change risk and resilience further, to ensure the proposed development supports the County Council's aims.</p>	<p>which currently does not take into account operational water.</p> <p>In line with the IEMA 2017 guide to GHG Assessment and Significance, a focus on proportionate assessment has been taken. As operational waste is not typically a key contributing GHG source, it was not proposed as part of the EIA Scoping Report and not subsequently requested to be scoped into the assessment in the Planning Inspectorate's Scoping Opinion. For context, waste management in 2017 was responsible for 4% of the total UK emissions.</p> <p>GHG emissions associated with land use change have been assessed within the ES chapter.</p> <p>The assessment of the effects of climate change on the Proposed Development has now been completed and has been included in the final ES chapter.</p>
<p><b>Gravesham Borough Council</b></p>	<p>The Borough Council regards climate change as a very serious issue. On 25 June 2019 Council declared that there was a climate emergency and pledged to do what is possible within its powers and resources to make Gravesham carbon neutral by 2030. Table 20.4 should therefore be amended to reflect that decision, which is impacting on Borough Council policies and operations. It will be necessary for the applicant to show that the Resort is meeting that aim inside Gravesham Borough as well as across the development as a whole.</p>	<p>Table 20.4 in the final ES chapter has been updated to include reference to Gravesham Borough Council climate emergency commitments.</p> <p>The GHG chapter includes commitments to reduce emissions across all key contributing GHG emissions, notably a commitment to net zero carbon in operation, only using renewable energy and 100% of on-site vehicles to be powered by electricity.</p>

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	<p>The objective of the scheme should be to minimise in design, construction and operation outputs that are instrumental in climate change. The science and technology of this topic are constantly evolving, so new opportunities and technologies may come forward. Tables 20.22-23 provide a summary of the current options, but these need to be turned into deliverable plans and implemented.</p> <p>Adapting to climate change involves at design taking into account such issues as handling flood risk, more intense rainfall and higher summer temperatures.</p> <p>An inherent problem with a large-scale development of this type is that to operate it needs to attract a large number of people from a wider area. Although more sustainable travel modes can be encouraged by a range of means.</p>	<p>The final ES chapter provides a summary of GHG emissions associated with operational energy and net zero commitments. More detail is provided in the Energy Strategy (Appendix 20.3).</p> <p>The assessment of the effects of climate change on the Proposed Development has now been completed and has been included in the final ES chapter.</p> <p>GHG emissions associated with operational transport has been assessed in the final ES chapter.</p>
<p><b>Ebbsfleet Development Corporation</b></p>	<p>Para 20.2. In line with current guidance (IEMA 2020 Guidance) the assessment should be split in three sections instead of in two:</p> <ul style="list-style-type: none"> <li>• GHG Emissions</li> <li>• Climate change resilience and adaptation</li> <li>• In-combination climate impact</li> </ul> <p>It is recognised that the in-combination assessment has been carried out within other chapters, but at a minimum, a summary should be provided within the climate chapter.</p> <p>Table 20.2 omits certain key pieces of legislation, policy and guidance. Please refer also to the Paris Agreement, Clean Growth Strategy and Climate Change and Sustainability Energy Act 2006.</p> <p>Table 20.3. This table states that the Kent and Medway Climate Change Risk and Impact Assessment has been delayed. However, this report is available.</p>	<p>We feel that the assessment of in-combination climate effects has been adequately carried out within relevant technical chapters and that it is unnecessary to repeat points within the ES Chapter. This avoids the chapter becoming overly cumbersome.</p> <p>These have been referred to in the final version of the ES chapter.</p> <p>This has been included in the final version of the ES chapter.</p>

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	<p>Para 20.13. This paragraph states that the decision to include or exclude a source of GHG is based on “The opportunities for design and construction decisions to significantly influence the reduction of a GHG emissions source”. However, we consider that the decision should not be based on the opportunities to influence the source. If the source emissions are high but there are no opportunities to reduce them, it could potentially be excluded?</p> <p>Para 20.14. The GHG emissions should be estimated and the data utilised for the estimations should align with the data presented within other chapters (e.g. materials, air quality, etc.)</p> <p>Para 20.16. This paragraph states “The scope of the assessment includes all works within the DCO order limits.” The study area should also include the area covered by the transport assessment for the study of material resources, waste and workers’ transport.</p> <p>Para 20.17. Does the model account for land remediation, landscape works and planting? These can all increase or decrease GHG emissions.</p> <p>Para 20.19. The paragraph states “The Proposed Development is targeting the achievement of net zero carbon emissions from operational energy. Therefore, it was not deemed necessary to quantify GHG emissions associated with operational energy.” It is considered that the chapter should present all GHG emissions associated to the operational energy to demonstrate that the net zero is achieved.</p>	<p>In line with IEMA (2017) guidance on assessing GHG emissions, a proportionate assessment approach is proposed to focus on the project's significant impacts. No significant sources of GHG emissions have been excluded. We are transparent on any GHG emissions sources that have been excluded.</p> <p>Estimates of GHG emissions are aligned with other ES chapters where applicable and data is available. Particularly waste, water and transport. Where the level of detail, for example rides and attractions, are not available at this early stage of the project and industry benchmarks are not available, a qualitative approach has been taken.</p> <p>This has been updated for the final ES chapter for the DCO application.</p> <p>An assessment of GHG emissions associated with land use change has been included in the final ES Chapter.</p> <p>This has been updated for the final ES chapter for the DCO application.</p>

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	<p>Para 20.21. Data from a baseline year should also be provided. The data provided by the transport consultants should include data with and without the Proposed Development</p> <p>Para 20.22. This paragraph only presents the study period for the operational phase. Separate study periods should be presented for the construction and operational phases.</p> <p>Para 20.23. This paragraph refers to the construction and operation of the development. End of life stage should also be considered.</p> <p>Para 20.35-20.36 &amp; 20.59. The limitations of the emissions factors themselves need to be addressed; acknowledging that they are considered the best available. The base data needs to be clarified. For example, have emission factors in ICE based on UK averages been used? There may be variation in carbon footprint simply due to geography and process in plant. In the event of uncertainty, worst case scenarios should be tested.</p> <p>This paragraph states 'For the 'land' category, GHG emissions have been assumed to be zero as it is assumed that no activity is taking place here that results in the release of GHG emissions'. However, Emissions and Removals of Greenhouse Gases from Land Use, Land Use Change and Forestry (LULUCF) for England, Scotland, Wales and Northern Ireland: 1990-2012 reflects that there will be emissions even if the 'land'</p>	<p>Current baseline and future baseline data has been provided for transport in the final version of the ES chapter.</p> <p>This has been updated for the final version of the ES chapter.</p> <p>GHG emissions associated with demolition of the Proposed Development have been assessed in the final version of the ES Chapter. We have set out best practice circular economy principles to reduce this.</p> <p>Data sources and limitations have been clearly stated in the final ES chapter. Due to limited design and construction information available with the Rochdale Envelope approach, best available industry benchmarks for building typologies have been applied to building areas. The range of carbon factors for individual materials and components will be considered as part of detailed Life Cycle Assessments during design development at the next stage. Emissions factors for energy, transport and waste are based on the latest published UK Government GHG Conversion Factors for Company Reporting.</p> <p>An assessment of GHG emissions associated with land use change has been included in the final version of the ES Chapter.</p>

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	<p>category changes from the same to the same type.</p> <p>Table 20.11. Current baseline has not been presented.</p> <p>Para 20.38. Future baseline data should have been presented in the report.</p> <p>Para 20.38. This paragraph does not include references to the sources of data.</p> <p>Para 20.39-20.40. GHG emissions from the development should be estimated.</p> <p>Para 20.42. This paragraph states that the proposed development is aiming to achieve net zero emissions from operational energy and provides some examples of how this could be achieved. Also refers to the Energy Statement. However, it is considered that a summary of the outcomes from the Energy Statement and a detailed justification of how it net zero has been achieved should be included here.</p> <p>Para 20.43. This paragraph states that the assessment of GHG emissions associated with the operational water consumption has not been undertaken as yet but not details of how this will be calculated have been provided.</p> <p>Para 20.44. This paragraph states that the assessment of GHG emissions associated with operational transport has not been undertaken as yet but not details of how this will be calculated have been provided.</p> <p>Para 20.14. These tables should include mitigation measures that have been embedded within the Proposed Development and commitments, not only opportunities.</p>	<p>Current baseline data has been provided in the final version of the ES Chapter.</p> <p>Future baseline data has been provided in the final version of the ES Chapter.</p> <p>References have been provided in the final version of the ES Chapter.</p> <p>GHG emissions from the Proposed Development have been estimated in the final version of the ES Chapter.</p> <p>The final version of the ES Chapter includes a summary of the outcomes of the Energy Strategy including a summary of how the Proposed Development is proposing to meet its target of net zero for operational energy.</p> <p>The assessment of GHG emissions associated with operational water consumption has been included in the final ES Chapter.</p> <p>The methodology based on data availability was under review with the Transport Consultant for the PEIR but an estimate for operational transport emissions has been included in the final ES Chapter.</p> <p>Noted, a summary of the sustainability commitments and implementation mechanisms are included in the final ES Chapter and</p>



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	<p>Para 20.49 &amp; 20.69. Mitigation measures for the operational energy emissions have not been included as the effects were deemed to be negligible</p> <p>Para 20.52. The PEIR states that it is not necessary to include a project by project cumulative assessment of climate change impacts “as it is carried out for many other environmental topics included in the ES” and because “cumulative and in-combination effects are inherently considered on a global scale...” This reasoning is unclear and insufficient.</p> <p>Para 20.57. The criteria used to determine the consequence has been defined based on change, serviceability, capacity, loss of function and loss of asset. It is considered that the descriptions are weak.</p> <p>Para 20.60-20.61. The future baseline does not include any climate projection for extreme weather events.</p> <p>Para 20.60-20.61. Current baseline data has not been provided.</p> <p>Para 20.62. The methodology to identify and evaluate risks has not been defined. This paragraph states that it will be included in the ES. It is considered that the methodology should be included within the PEIR.</p> <p>Para 20.63. This paragraph states that the identification and evaluation of climate risks has not been completed and that will be completed for the ES. It is considered that an initial assessment should be included within the PEIR.</p>	<p>aligned with the Sustainability Statement.</p> <p>Noted, a summary of the Energy Strategy has been included in the final ES Chapter.</p> <p>This has been clarified in paragraph 20.98 of the final ES Chapter.</p> <p>The criteria have been updated for the final ES Chapter to provide greater clarity.</p> <p>Additional information on climate projections for temperature, precipitation, sea level rise, wind and snow have been included in the final ES Chapter.</p> <p>Current baseline climate data has been included in the final ES Chapter, taken from the closest Met Office weather monitoring station.</p> <p>The methodology for identifying and evaluating risks has been included in the final ES Chapter.</p> <p>The identification and evaluation of risks has been included in the final ES chapter.</p>

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<p><b>Environment Agency</b></p>	<p>There is no mention the effects of climate change on the tidal flood defences. It must be acknowledged that it will be a key consideration in both the Flood Risk Assessment (FRA) and the Environmental Statement (ES) for appropriate design of new or works to existing flood defences.</p> <p>Chapter 20 recognises that the assessment must include Climate Change Mitigation and also Climate Change Adaptation and resilience. However, it then does not include anything on flood risk mitigation to address sea level raise or increased rainfall intensity.</p> <p>20.56 States that the project lifetime is considered to be 60 years. We disagree that this is a reasonable estimate of the lifetime of the development given the long period before the second phase will be completed and the fact that some other Theme Parks in the UK have been operational for 100-years.</p>	<p>Consideration of the effects of climate change has been taken into account in the Flood Risk Assessment and Water Resources and Flood Risk ES Chapter.</p> <p>Section B of the final ES chapter provides a climate change resilience risk assessment. Additionally, a section on climate change adaptation and resilience has been incorporated into each technical chapter.</p> <p>The 60-year period that you note is in relation to GHG emissions and is the typical design life of a non-residential building, as per BS EN 15978:2011. For the effects of climate change on the Proposed Development (resilience and adaptation) we have gone beyond this and used UKCP18 projections up to the 2090's. Additionally, a 100-year design life has been assumed in the flood risk assessment.</p>