

Mawdsley, Edwin

From: David Milham <David.Milham@fsb.org.uk>
Sent: 27 January 2021 16:49
To: London Resort
Cc: sonia.collins@dartford.gov.uk; pmconsulting@outlook.com
Subject: London Resort Project
Attachments: Area to exclude from DCO.pdf; EDC Vision.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: EO

Dear Sirs

LONDON RESORT PROJECT

We note that the application for the Development Consent Order was submitted on 4 January 2021.

We urge the Planning Inspectorate to reject the application for the following reasons:

1. The applicant refers to the site as "mostly post-industrial brownfield and largely derelict". In fact there are 140 active businesses located on the site providing direct employment for 2,500 plus an estimated 2,500 jobs in supportive operations. The proposal makes no provision for the relocation of the businesses, either to part of the site not shown as required for the theme park, as was originally indicated by the applicant in 2015, or to assist in acquisition of suitable sites locally. It should be noted that some of the businesses providing services to the community require specialist Environment Agency licences.
2. The applicant has indicated that they would purchase at 130% market value - this is only relevant to the businesses that own their freehold, and the 30% uplift is unlikely to cover the costs and disruption incurred in relocation. For businesses that rent the premises no assistance in relocation costs is proposed.
3. The applicant is required to mitigate the impact to the existing businesses occupying the site, including assessing alternative design options. The attached plan identifies the area occupied by many of the businesses - there is clearly unused space around the proposed theme park that could accommodate the buildings proposed in that area.
4. The applicant has not addressed any objections raised by the Statutory Consultees in July 2020 scoping report
 1. Kent County Council - The displacement of existing businesses from Manor Way, Northfleet and Kent Kraft Industrial Estates needs to be given more detailed attention as there are limited alternative locations for some businesses on these industrial estates.
 2. Dartford BC - The Council would like to understand the impacts with regard to displacement of employment on the proposed site....Will the services they provide still be available to local communities? What is the consequence of the loss of these local businesses for local communities, in terms of both employment, the services they provide as well as the impact on the businesses themselves.
 3. Gravesham BC - There are a significant number of local businesses that will be displaced and the Borough Council would expect the developer to work with businesses to assist in the process of seeking their relocation.

4. Ebbsfleet Development Corporation - It is not clear that the applicant fully understands the existing or future baseline, and the EDC's vision and remit. In particular, key elements of the future baseline (such as the permitted Ebbsfleet Central Development) are ignored, and the existing businesses on the Swanscombe Peninsula are only lightly referenced. There is little evidence that the applicant will be referring to, and giving sufficient weight to, key guidance or visioning to documents produced by EDC. The area to be occupied by London Resort in the EDC Vision excludes most of the area currently used by businesses (see attachment)
5. The applicant claims to have consulted stakeholders widely in the period September - November 2020 - there is no evidence that the results of these 'consultations' have had any impact on the proposed design, construction phase or operating proposals.
6. The applicant claims that 6,800 jobs will be created when the theme park opens. However, in answer to a 2015 consultation only 55-60% are expected to be filled people in the local travel to work area, i.e. 3750. This barely covers the jobs lost in the businesses that currently occupy the site. It also clarifies the reason for the large development to house imported workers which is shown in the plans.
7. Ebbsfleet Development Corporation have widely consulted on, and modified plans as a result of those consultations, to create 15,000 high quality homes together with 30,000 jobs around the Central Station area. The plans submitted by the applicant completely ignore the EDC vision and will prevent the sustainable development proposed and many of the high grade jobs.

This is a commercial project, the only project of this type given National Infrastructure Status, and the applicant has displayed an arrogant disregard for the businesses that occupy the site, the local Councils that represent the interests of residents and Ebbsfleet Development Corporation vision for the area.

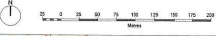
Alternatively, the Planning Inspectorate could apply the same level of scrutiny as the other National Infrastructure Project in the area, the Lower Thames Crossing, and direct that the application be withdrawn, to allow the applicant to properly consult, set up an organisation to actively assist businesses locate (as set up prior to the Olympic Park construction), modify the plans to minimise the disruption to established businesses, minimise the impact on local residents (for instance redevelop Swanscombe Station instead running buses from Greenhithe through a residential area) and facilitate the EDC proposals for 30,000 new jobs around Ebbsfleet Station. The plans need to be far more detailed than those submitted and give clear and unqualified mitigation to all aspects raised during consultation.

The applicant should be advised to consult with both Lower Thames Crossing and Ebbsfleet Development Corporation on how consultations should be carried out and the importance of modifying plans in the light of those consultations.

David Milham
Regional Chair - South East
Federation of Small Businesses
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THE LONDON RESORT DEVELOPMENT CONSENT ORDER
 Regulation 82(2)(b) and (5) - Land Plans
 DARTFORD BOROUGH COUNCIL AND GRAVESHAM BOROUGH COUNCIL
 Sheet 2 of 5

FOR CONSULTATION PURPOSES



- Key:
- Other
 - Local
 - Land
 - Areas over level
 - Temp
 - Temp and rights
 - Land and possess
 - Land and possess
 - Areas
 - Temp and rights

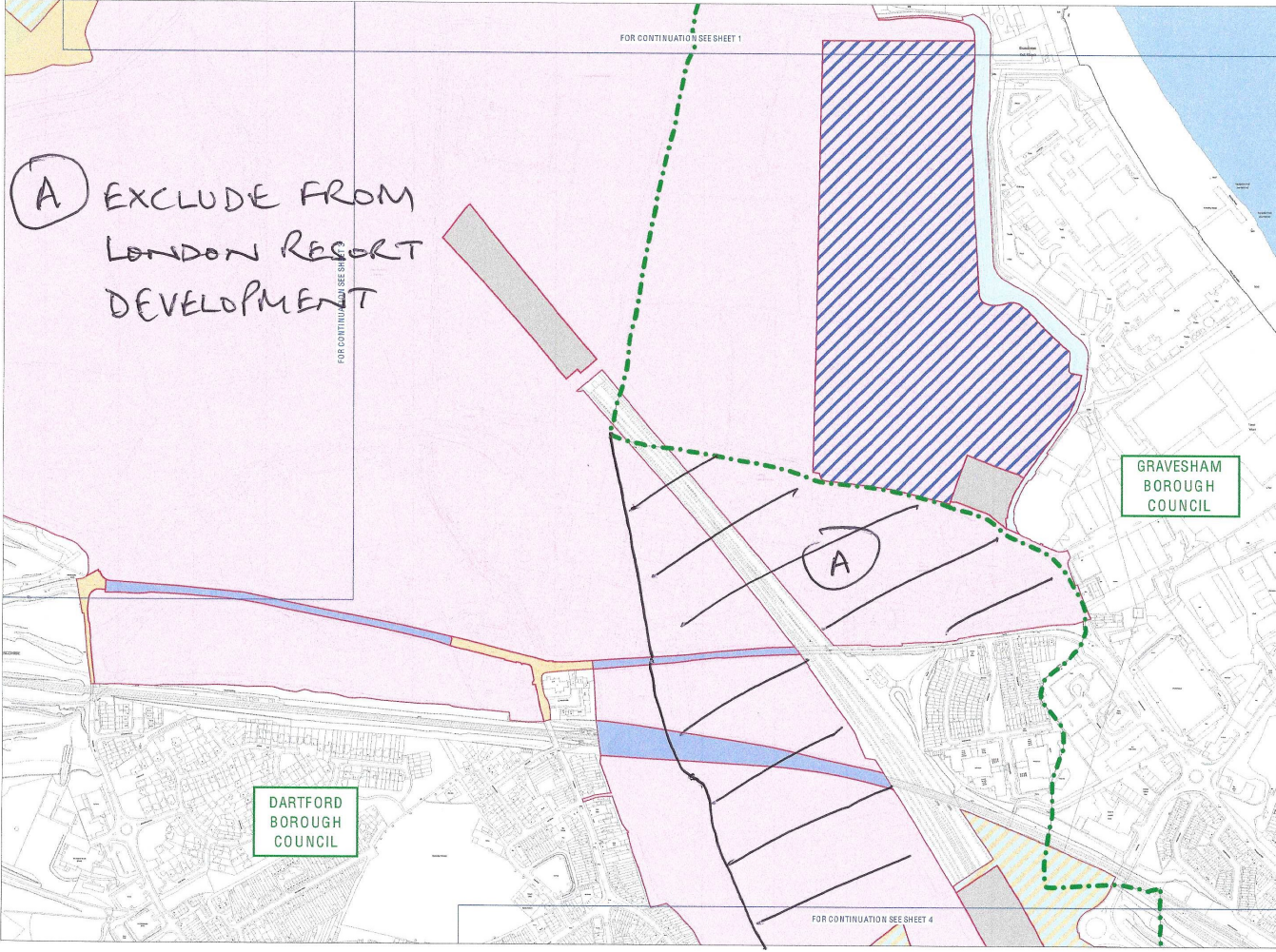


08/11/14, 14:00:00
 1:2500 @ A1

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THE LONDON RESORT
 Regulation 82(2)(b)
 DARTFORD BC
 GRAVESHAM BC

Application Number: BC080001
 Date of Revision: 14/05/14
 Scale: 1:2500 @ A1



(A) EXCLUDE FROM
 LONDON RESORT
 DEVELOPMENT

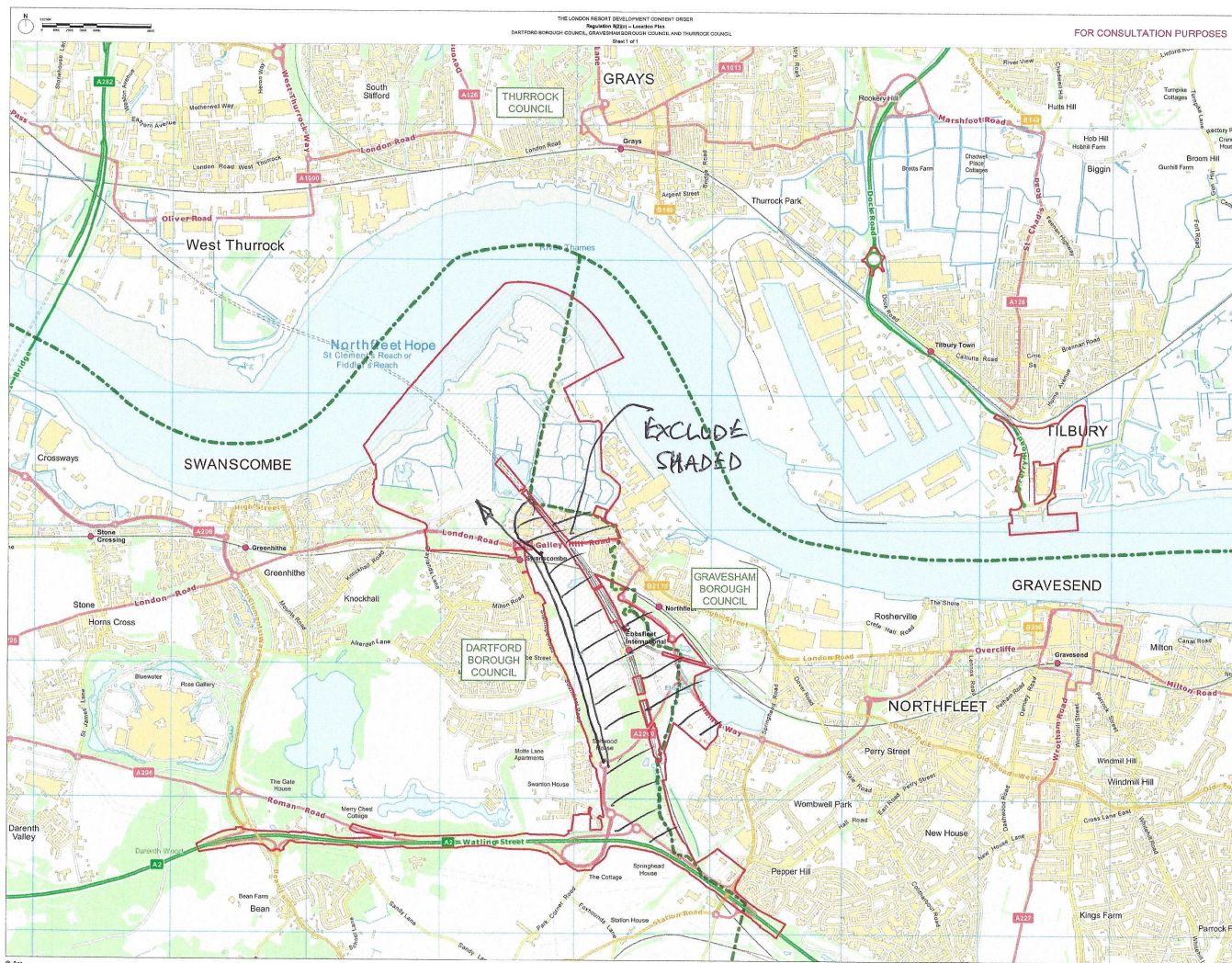
DARTFORD
 BOROUGH
 COUNCIL

GRAVESHAM
 BOROUGH
 COUNCIL

FOR CONTINUATION SEE SHEET 4

FOR CONTINUATION SEE SHEET 1

FOR CONTINUATION SEE SHEET 3



Key

- Motorway
- Major Road
- Local Road

238 St John Street London EC2A 4EJ
 Project: The London Resort
 Client: The London Resort
 Drawn: [Name]
 Date: [Date]
 This document is for consultation purposes only. It is not a final decision and does not constitute an offer of any product or service.
 THE LONDON RESORT DEVELOPMENT CONSENT ORDER
 REGULATION 10(1) - LONDON PLAN
 DARTFORD BOROUGH COUNCIL, GRAVESHAM BOROUGH COUNCIL AND THURROCK COUNCIL
 Application Number: BC080001
 Drawing Number: LRDS-APT-DCP-01
 Scale: 1:12500 @ A1

17 Minutes
to London

Community Vision for Ebbsfleet

This diagram was developed from the many ideas shared by the local community during the first round of engagement in 2015, which was entitled 'What's growing in your Garden City?'



120 minutes to Paris
72 minutes to Lille
110 minutes to Brussels