



Our Ref: OUTL/21/003

The London Resort case team
The Planning Inspectorate

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Dear Sir/Madam

The London Resort, Swanscombe and Tilbury: TfL's relevant representation

The text of this relevant representation has also been submitted online through the web portal for this case.

Introduction

Transport for London (TfL) is the strategic transport authority for London. The site on the Swanscombe Peninsula is just four junctions from London on the A2, which is part of the Transport for London Road Network for which TfL is Highway Authority within London, and the site in Tilbury is similarly located in relation to the TfL-controlled section of the A13. Further, the Swanscombe site is three stops from London on the rail line through Dartford, and one stop from London on the high-speed rail line.

Given this close proximity in transport terms, coupled with the scale of the Proposed Development and its forecast demand flows from, to and through London, it is clear that it will affect transport networks within London as well as strategic transport projects in which TfL has an interest. Indeed, much of the supplied documentation indicates heavy reliance on London as a market for visitors to the Proposed Development (both for London residents and for hotel stays of national and international visitors), and on the transport network of London to deliver visitors from a wide catchment. London is also likely to be a key source of staff.

Finally, TfL has a statutory interest due to a Safeguarding Direction by the Secretary of State for Transport of the route of a potential Elizabeth Line (formerly Crossrail) extension through Swanscombe and Northfleet stations, the route of which is within the red line boundary of the Proposed Development.

TfL recognises the potential significant economic benefits that are offered by the scheme, not just for Kent and Essex but also for London, with the potential to secure jobs and growth, directly and indirectly. However, we are determined that

the impacts on issues over which TfL has statutory duties should be properly assessed and, if necessary, mitigated. Additionally, we would wish to engage more generally to ensure that the Proposed Development maximises positive impacts and achieves “good growth” and sustainability objectives for London as well as Kent and Essex.

Engagement

Other than blanket generic invitations to comment on earlier consultations, TfL was not contacted directly by the applicant until we were invited, with just four days’ notice yet a month after the initial invitation was sent out to others, to a workshop on 21 January this year. This is despite responding to the EIA Scoping Report (our letter to you dated 20 July 2020) and the Section 42 Consultation (our letter to The London Resort dated 21 September 2020).

Both those letters raised serious concerns about the proposed assessment techniques and methodologies, which are outlined below. Neither representation appeared to have any impact on the methodology used for the EIA and supporting Transport Assessment (TA) and thus these serious concerns remain.

TfL’s concerns

Assessment parameters and scenarios

There appears to be considerable secrecy over demand forecasts for the Proposed Development, with significant sections redacted and many figures presented without any evidence. A range of assumptions have been made about visits to the park, including the type of visitor, the nature and timing of their visit and considerations over how they will make their journey. Without visibility of these, nor any constraints on a different pattern of visitors emerging, concerns persist about substantial divergence from the assessment presented.

We have considerable uncertainty over the daily flow profiles which are fundamental to the assessment of impact, given the potential to coincide with existing extended network peaks.

Using the 85th percentile busiest day is clearly unacceptable as, by its very nature, 15% of days will exceed these flows. It is necessary to assess a number of scenarios including the busiest weekdays during term-time and, separately, school holidays, and the busiest Saturday, Sunday and Bank Holiday, given the cumulative impacts of peak flows arising from the Proposed Development superimposed on different levels of background demand and, in relation to public transport, service levels.

For both road and rail impact, TfL has concerns over the resilience of the networks. An incident on the Dartford Crossings or delays on the HS1 rail lines, for example, could lead to a significantly different pattern of demand. Since such incidents are relatively common, especially on the Crossings, it is reasonable for those effects to be considered. The increased temporal spread of high vehicle and passenger flows will reduce opportunities for incident recovery as well as essential planned or reactive maintenance and repair.

Road network impact

The M25, the Dartford Crossings and other parts of the strategic road network in this area already suffer from congestion for extended periods. The use of a spreadsheet model is totally inadequate for assessment of the impact of additional flows since it cannot effectively model the congested nature of the network and the diversionary effect that will result. We anticipate that flows from the Proposed Development, especially in the “without Lower Thames Crossing” scenarios, are likely to lead to diversion of traffic onto TfL’s strategic road network, including alternative river crossings such as Blackwall and Silvertown Tunnels, in addition to traffic generated to/from London itself. The spreadsheet model does not appear to consider any junctions inside the area bounded by the M25.

Further, consideration of one single weekday morning and evening peak hour does not recognise the fact that, in part due to the congested nature of the highway network, the existing peak period lasts considerably longer than a single hour. We believe it is necessary to consider the superimposition of forecast vehicle movements onto background flows throughout the day to determine whether a new network peak is created. As noted above, weekends and bank holidays should be considered.

Overall, the lack of appropriate assessment methodology is potentially hiding significant impacts that must be mitigated.

The IEMA guidelines cited in EIA paragraphs 9.110ff would appear to be irrelevant where transport networks are close to capacity. For example, it is clear that imposing an additional 10% of baseline flow to a road which is within 10% of its practical maximum capacity will have a significant impact on the operation of that road, with pollution, delays and road safety impacts massively out of proportion with the flow increase, whereas the IEMA guidelines applied to the DMRB LA104 scale would assess this as “no change”.

Rail network impact

Again, the failure to use appropriate modelling tools means that impacts on the rail and underground network have not been assessed with any degree of certainty. Assumptions used appear to be unsupported yet fundamental to the assessment, and present the potential for vastly different impacts which must be assessed and, if necessary, mitigated.

We understand that further assessment work is underway at St Pancras station to identify the need for additional station infrastructure (platform, lifts, escalators), yet an engineering study to determine the feasibility of potential interventions has not been undertaken. Moreover, the knock-on impacts appear not to have been considered and no assessment has been made of the impact of flows on the London Underground station there. The arbitrary assumptions about the scale of traffic that will use the North Kent lines risks ignoring potential impacts at their central London termini and on interchange flows at Abbey Wood (to the Elizabeth line, formerly Crossrail). TfL considers it essential that modelling is undertaken

using TfL's regional public transport model (Railplan), including testing a number of potential alternative demand and route scenarios.

Given the scale of the rail demand forecast to be generated, it appears certain that additional train services (particularly between St Pancras and Ebbsfleet if forecasts are proven to be robust) and lengthened trains are likely to be required which will require additional rolling stock and potentially also infrastructure improvements at stations in the proximity of the Proposed Development. TfL considers that such additional rail capacity will need to be secured in the DCO for the transport impacts of the Proposed Development to be accommodated.

River, coach and bus service impacts

TfL has an interest in river passenger services, as the body which plans and regulates the timetabled river bus services and as the owner of some piers and the Underground, Overground, DLR and Elizabeth Line stations to which many passengers are likely to transfer. In the scenarios which entail high riverbus demand, it needs to be demonstrated that there is adequate pier capacity, primarily in central London, as well as capacity at the interchanges for onward journeys that these piers connect into.

As strategic transport authority we also have an interest in coach services, both long-distance scheduled services, commuter coaches, and "tours and excursions", with concerns over the potential overloading of stopping facilities in a variety of locations. Local bus services operated under contract to TfL may also be affected in Havering, Bexley and Bromley with, for example, one service already extending to Greenhithe and two others serving Bluewater. There may be potential to further extend or alter services to better serve the Resort, particularly for staff travel, which has not been investigated, and increased congestion on local roads could lead to a need for bus priority.

Sustainable mode share

Given the scale of flows between the Proposed Development and London, it is appropriate that adequate consideration is given to the Mayor of London's Transport Strategy and specifically its mode share target to support environmental and public health objectives. Specifically, this requires 80% of trips in London to be made by sustainable modes in 2041. Trips across the London boundary are included within the scope of this target and the Proposed Development should include measures to support this.

Insufficient evidence has been provided as to how the mode share figures have been arrived at and why they should be given credibility. The substantial parking offer (including for staff), and comparatively inconvenient and potentially expensive access to rail services, risks skewing journeys towards car. No detail has yet been offered as to the potential travel demand management levers to be used to encourage sustainable modes, including parking charges and financial incentives to use public transport. We expect these to be set out, together with a binding commitment by the applicant to mode share targets for trips between London and the Proposed Development.

Conclusion

TfL has registered as an Interested Party and intends to make further representations and participate in the DCO Examination in order to seek to protect its statutory interests, secure the efficient operation of transport networks in London, and support its sustainable mode share objectives. We hope that the applicant will start to engage with us, particularly over undertaking an appropriate assessment of the impacts of their proposal would have on transport networks in London, to seek to resolve our concerns prior to the examination. We have already offered to make our models available.

If you or the applicant have any questions about this letter, please contact Tim Gould [REDACTED] and Richard Carr [REDACTED] or [REDACTED]

Yours sincerely

[REDACTED]

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