



---

THE BRITISH ASSOCIATION OF LEISURE PARKS, PIERS AND ATTRACTIONS

---

28<sup>th</sup> May, 2021

Dear Planning Inspectorate

**London Resort DCO application**

I am writing regarding the above, and specifically in relation to the intention of LRCH (the applicant) to submit updated and new documents in support of the application.

I am the Chief Executive of the British Association of Leisure Parks, Piers and Attractions (BALPPA), representing the interests of our 300 members, including the owners, managers, suppliers and developers in the UK's commercial leisure parks, piers, zoos, family entertainment centres (indoor play and soft play centres) and static visitor attractions sector.

BALPPA has not, to date, made any formal representations in relation to the London Resort DCO application (although I did write a number of years ago, as documented on London Resort page on your website). However, we note that the applicant (LRCH) has recently submitted a schedule of proposed updated and new documents which it intends to submit over the coming months, during an extension period being granted because of the recent SSSI Notification. In particular, we note that this includes a completely new document called a **Supporting Resort and Leisure Market Assessment**, which LRCH intends to submit by 3<sup>rd</sup> September 2021.

The title of this document suggests that it will directly relate to many of the businesses which BALPPA represents, and is likely to contain information / analysis about the existing leisure sector in the UK.

Arguably, this document should have been submitted with the application at the end of December 2020, as it is likely to be highly relevant to the issues under consideration in the determination of the London Resort proposals – particularly now that you have identified *“the nature of the UK's existing visitor attraction market and the effects on existing theme parks and resorts, including diversion”* as a principal issue to be examined.

If this document had been included with the application, we (BALPPA) and / or some of our other members would have reviewed it and decided – by the deadline of 31<sup>st</sup> March – whether to make Relevant Representations in order to become Interested Parties. However, because it has not yet been made available, we have not been able to do so.

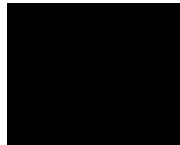
We understand that you are intending to exercise your discretion to allow additional documents such as this **Supporting Resort and Leisure Market Assessment** to be accepted during the extension which is being granted to LRCH (even though such a document does not appear to have any direct relevance to the SSSI Notification, for which the extension is being granted). As a result, these documents will form part of the documentation which is considered when the DCO is examined.

Given the discretion you are exercising in allowing such additional documents to be submitted, I would respectfully ask that you further exercise your discretion in re-opening the period for Relevant Representations being made, in order to allow potential Interested Parties to respond. Given that we expect the content of the aforementioned new document to be highly relevant to our members, it is quite possible that a number of them may wish to make Relevant Representations in response to it. We (BALPPA) may consider doing the same.

I would be grateful if you could consider this request at the earliest opportunity. If you are not minded to allow further Relevant Representations to be made, I would ask that you do not allow LRCH to submit such further documentation. There must be a level playing field between LRCH (as a potential new leisure operator) and those who may be affected by their proposals (particularly given the identification of this aspect as a principal issue).

As I said in my earlier representation on this matter, we wholeheartedly support any growth in our industry and welcome the contribution successful newcomers can make, especially when they promise to increase inward investment and bring in more inbound tourism. If LRCH are successful in bringing this ambitious project to fruition, we look forward to inviting them to join BALPPA.

Yours sincerely



**Paul Kelly**  
**Chief Executive**  
**British Association of Leisure Parks, Piers and Attractions**