

Rynd Smith
Lead Member of the Examining Authority
London Resort
Email to:
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Environment Directorate
Ask for: Nick Brown
Telephone: [REDACTED]
Email: major.infrastructure@gravesham.gov.uk
My ref: LRCH/Deadline A
Your ref: BC080001
Date: 15 March 2022

Dear Mr Smith

Planning Act 2008 – Section 88 and The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 4, Rule 6, Rule 9 and Rule 13
Application by London Resort Company Holdings for an Order Granting Development Consent for the London Resort

In the Rule 6 letter dated 14 February 2020, you asked in Annex D for various items of information by Procedural Deadline A - 15 March 2022. Please note that we have responded separately to your request, on page 4 of the 1 February procedural decision, for our own list of engagements (consultation and meetings) with the applicant undertaken between 1 February and 10 March 2022. The position has changed, see below.

The Borough Council is supportive of the development of London Resort because of the significant socio-economic benefits it can generate for North Kent in terms of economic activity, employment and socio-economic uplift. This support has been caveated however to be clear that the development has to be done in such a way as to maximise the benefits and minimise the impacts, providing appropriate compensation and mitigation measures. Given the flexibility being sought in the original application and the way the Park could evolve, we have been clear that it is important to have in place an overall monitoring strategy with actions to be taken if certain limits are breached. Given a positive approach to these issues, there is no reason to suppose that the concerns cannot be resolved in an acceptable manner. It goes without saying that this has to apply across the entire development and not just the part in Gravesham.

On the administrative items:

- The Borough Council is content to participate in virtual events as the main means of holding hearings.
- The Borough Council would like to participate orally at the Preliminary Meeting and has so indicated on the registration form
- The Borough Council would like to be heard at Issue Specific Hearing 1 and has so indicated on the registration form
- The Borough Council would not wish to be heard at Compulsory Acquisition Hearing 1 as land within its ownership is no longer directly affected by the proposal
- Whilst we understand that Open Floor Hearings are only timetabled if requested by Interested Parties and the Borough Council is not currently anticipating making an oral

representation at an Open Floor Hearing, should one is requested, we consider that this should be an in person rather than virtual event, ideally in a location close to the site i.e. Northfleet.

In case there is any confusion MS Teams invites to on line hearings, which are people specific, should be sent to Wendy Lane and Tony Chadwick's email addresses but all other communications should go to major.infrastructure@gravesham.gov.uk. This email address is monitored by a number of people and ensures action is taken as soon as possible if required.

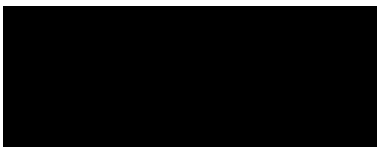
On the matter of the timing and procedure as identified in the letter of 1 February letter the Borough Council would make the following observations:

- The application was submitted at the start of 2021 and proceeded at a normal pace with Relevant Representations submitted by 31 March 2021 (with some extension for some parties)
- On that basis a decision from the Secretary of State on the application could have been expected in mid-summer 2022 following a mid-summer 2021 start to the Examination
- However on 11 March 2021, Natural England declared the Swanscombe Peninsula a Site of Special Scientific interest, which was subsequently confirmed with minor modifications on 10 November 2021
- The applicant asked for additional time to allow for further work and amendment of documents as a consequence of this – which was entirely reasonable in the circumstances
- This was subsequently further extended with a schedule of documents to be produced and a proposed timetable dated 29 September 2021
- This laid out a timetable that would have lead to a public consultation in late February 2022 for 5 weeks and, after amendment, submission to the ExA in April/May, leading to an Examination starting in June/July
- In a letter dated 1 September 2021, the applicant set out the broad areas where further work was being done both because of the SSSI but also issues raised in the Relevant Representations, in particular in relation to traffic modelling:
 - “Land use and socio-economic effects (6.1.7);
 - Land transport (6.1.9);
 - Landscape and visual effects (6.1.11);
 - Terrestrial and freshwater ecology and biodiversity (6.1.12);
 - Noise and vibration (6.1.15);
 - Air quality (6.1.16); and
 - Greenhouse gases and climate change (6.1.20)”.
- Gravesham's Relevant Representation noted the Council's support for the proposal but highlighted a number of areas where additional information, controls or other measures were needed to ensure that the positive benefits were obtained locally but also measures or other changes put in place to deal with various concerns or uncertainties as to possible impacts
- Given the time lapse since the original submission it is possible that other elements of the Environmental Statement (ES) may need updating to ensure that consideration of the project is undertaken on a robust basis. Equally as the scheme promoter has been undertaking studies for some time, the longevity of some of the trends in the ES may be sufficient for some topics with additional technical work upfront and commitments to monitoring requirements in the DCO

- The Council is sympathetic to the concerns and uncertainty the delay is causing, especially for business's and landowners at the base of the Peninsula who are potentially subject to Compulsory Purchase powers and appreciates the ExA's desire to progress the examination in a timely fashion
- This also impacts on Ebbsfleet Development Corporation and its proposals for Central Ebbsfleet, which in turn has implications for the Gravesham Local Plan and the delivery of a strategic scale development with could deliver significant benefits to Dartford and Gravesham
- We are also sympathetic to the challenges that the delay is causing to PINS as the legislation and regulations do not envisage this sort of situation, thereby giving the ExA a lack of clarity procedurally as to the way forward
- There has been little or no engagement between the Borough Council and London Resort since September 2021 until 14 March 2022 when there was a phone call from their agents, Savills, updating on the current position and suggesting forward progress
- If progress is being made in tackling the outstanding issues, it would be desirable to produce a mutually agreed timetable for the start of, and detailed programme for, the Examination of the application on a later timescale than the end of March
- The Borough Council is also expecting a DCO application from National Highways for the Lower Thames Crossing later in the year, which poses a resource and timetabling challenge.
- Otherwise the ExA must balance out the full range of views expressed to it previously and those contained in the responses to Deadline A after 15 March, and from those to be made at the Preliminary meeting. The ideal would be an Examination with the full range of additional and amended material

Further comment will be held over until the Preliminary meeting and the circumstances of the time.

Yours Sincerely



Director (Environment) and Deputy Chief Executive