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11 December 2014

By email

Mr Will Spencer
EIA and Land Rights Advisor
On behalf of the Secretary of State
The Planning Inspectorate
3/18 Eagle Wing
Temple Quay House
2 The Square
Bristol, BS1 6PN

Dear Mr Spencer

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (as amended) – Regulations 8 and 9

Consultation on an Environmental Impact Assessment Scoping Report for the development of the London Paramount Entertainment Resort at Swanscombe Peninsula, Kent by London Resort Company Holdings Limited (LRCH or 'the Developer').

I am writing from the Diocese of Rochester, as a statutory consultee through our role as the established Church of England, our long term role in the communities affected, our landownerships, and overall interest in the area as a partner with other statutory bodies including the local authorities.

The recently closed consultation, referred to in this letter, didn't include the Diocese, something we would like to see amended for future consultations, and we hope this letter gives the Inspectorate a direct contact for future correspondence. Unfortunately we only heard about the consultation on the 9th of December, its closing date, but I understand from my call on the 10th of December with Mark Wilson from the Inspectorate that our submission would be considered.

With limited time available we have restricted our comments to the areas of the Socio Economic Effects and Cultural Heritage, as these mirror most closely our statutory responsibilities. The Diocese, in making these comments, also recognises that the detailed issues on this large and complex scheme are at this stage constantly evolving and being worked through by the applicant, and that this stage is an initial scoping report.

Socio Economic Analysis

The EIA Scoping Report states that there are no established principles for undertaking a social-economic impact assessment, and relies heavily on HM Treasury Green Book approach to provide an analysis structure for understanding the socio-economic impacts. Whilst recognising the difficulty of finding a framework which can encompass the breadth needed we would see the current level of detail insufficient and lacking the depth needed to understand the local area and the impacts of the proposed development. We would therefore agree with Gravesham Borough Council's detailed assessment, which they have shared with us, and is set out in paragraph 8.116 of their response, and is set out below for ease of reference,

"Additional Analysis Required

8.116 As an absolute minimum, the applicant should therefore address deficiencies in the following areas:-

- A detailed profile of labour demand arising from the development (during both construction and operation) should be provided detailing the types, skill and wage levels of jobs (distinguishing between temporary/permanent/full/part-time jobs) to be created both on and off site;
- An analysis detailing the catchment from which such labour is likely to be drawn (disaggregated to show potential variation in catchment for different categories of labour supply); current socio-economic and labour market conditions within that catchment (including sub-areas where disaggregated); and the ability of that catchment to meet labour demand, paying particular attention to sub-areas within North Kent and adjoining areas to ensure that there is a good fit between the potential supply and demand for labour; *(and this also feeds into the transport analysis)*
- An analysis detailing any potential skills gaps required to be filled to service the London Paramount development and how those gaps might be filled so that local people can take full advantage of the opportunities development may bring. Early discussions with Jobcentre Plus would be helpful in terms of identifying capacity in the local labour market and what effects such a project would have on the wider sub regional employment market and potential transport issues. Jobcentre Plus is in similar early discussions with Ebbsfleet UDC;
- An analysis detailing the extent to which the proposed development will contribute to economic or regeneration objectives for the area, including potential cumulative impacts having regard to other current and planned major economic developments within the area. Such analysis will also need to identify implications for the employment strategies (either implicit or explicit) in existing development plans for the area, particularly in terms of whether London Paramount could act as a substitute for existing employment allocations and/or likely demand for B Class (or other Use Class) employment space within the area;

- An analysis detailing any implications of London Paramount in terms of in-commuting and housing need generated within the area under different employment scenarios. Such an analysis should also include details of any proposals to provide on or off-site staff accommodation for London Paramount during both construction and operational phases. In terms of the construction stage this should also consider the knock on effects to local B&B and hotel bed supply and environmental impact these may cause on land uses (i.e. temporary workers camps);
- An analysis and justification for the retail and leisure components at London Paramount as an out of centre location that might compete with or divert investment away from other existing or planned centres in the form of an NPPF compliant retail and commercial leisure impact assessment;
- An analysis of visitor and tourist impact on the wider area as a result of the operation of the London Paramount facility, detailing possible multiplier effects within the local economy. This should also include details of likely levels of indirect/induced employment associated with the spending of visitors, together with indirect/induced employment associated with the spending of on-site employees; Visit South East and Visit Kent may have primary research concerning domestic and foreign visitor behaviour of choices.
- An analysis of the implications of London Paramount (in combination with the phased delivery of other planned development) in terms of impact on population and the local labour market, together with increased demand for improved social infrastructure during both the construction and operational phases – including the need for additional health provision, child care, sports and recreational provision to meet the needs to employees/visitors, policing, fire services and emergency planning etc.; and
- An analysis of trade diversion that might occur as a result of the London Paramount development, having regard to the economic impact on existing provision within the facility's zone of influence. i.e.
 - Alternative Theme Parks – such as Legoland, Chessington, Thorpe Park, Disneyland Paris etc.
 - Alternative Cinemas – such as at Bluewater, Lakeside, Medway Valley, the Woodville etc.
 - Alternative Theatres and Venues - such as the Orchard, the Woodville, the Churchill at Bromley etc.
 - Other Hotel/Guest Accommodation – to be identified.”

Further, it is vital that the impact on employment, employability, transport, and housing identifies not only where the opportunities for London Paramount are, but that it analyses and proposes a framework for how the existing communities surrounding the proposed development will benefit. It is considered not enough to merely state the considerable numbers of new jobs, but to show how the current communities will be assisted to have their capacity raised in order to access roles which are not solely at the lower end of the wage spectrum.

The scale of this proposal is similar to that of the work which took place around the Olympic park. In that situation the ODA set out significant work which sought to include the existing

and surrounding communities from the outset. It sought to understand where the gaps were in existing education, training and wider capacity of the community. The communities around the proposed London Paramount development share many similarities in terms of socio economic status, and demographic mix, with the communities of Stratford and Hackney which directly border the Olympic park.

We would therefore expand further the additional analysis required as referred to by Gravesham Borough, to include.

Analysis which sets out,

- The area that it considers will be directly impacted,
- The socio-economic make-up of the surrounding areas of both Gravesham and Dartford Borough Councils,
- The educational and skills of the communities identified within that area
- The gaps in capacity highlighted above to fill the employment opportunities within the London Paramount development
- How LRCH will engage with the communities
- How LRCH will prioritise its work in building the capacity of those communities to engage in a meaningful manner, both for the proposed development and the existing communities
- How it will set targets, and meet them in terms of
 - the numbers of local people employed during the various phases of the development through to operation
 - the training and educational opportunities provided in the lead up through to opening and operation, for the surrounding communities
- How the above can be delivered, and what partners they need in order to do this.

Further, the analysis and proposed work also appears light in dealing with the more difficult area of 'community building'.

The development proposals are potentially a massive boost for the area, but there remains a significant risk that any analysis and plans miss the crucial point of how the old and new communities relate, interact and grow together. The risk is significant and should not be ignored. Our clergy, based in every community are already indicating that this risk should be addressed as there is a growing feeling of 'us and them', and the plans are only at an early stage.

The socio-economic mix of the surrounding areas is complex, with significant economic dislocation over many years, made worse in recent years by the pressures of austerity. The analysis provided in the **'It Took Another Riot' report, the Mayor of London's report** into the after effects of the 2011 riots in Tottenham provide a good reference document with which to refer, not in terms of the local authorities role, but in terms of the challenges it lists for the area. As it states *"interconnectedness of the issues cannot be overstated"*. Even if the mix and weighting of issues differs, the interconnectedness of them does not. It is this interconnectedness which is missing almost in entirety from the scoping and proposals.
<http://www.london.gov.uk/sites/default/files/It%20Took%20Another%20Riot.pdf>

The Diocese of Rochester underlines the need for any analysis to get to grips with and propose how the proposed development will tackle this interconnectedness and the opportunities it creates.

Cultural Heritage

The Church of England has a number of significant historic buildings in and directly around the proposed development which are not mentioned, but would need to be considered due to the positive opportunities offered by the development, along with the increased pressures placed on them through increased visitor numbers, traffic increases and needs for use of community facilities.

The scoping report goes into significant detail in relation to prehistoric and Roman/Saxon periods but is thin on later developments which have more significantly shaped the area. We would encourage this to be addressed as not only is it a gap, analysing and researching it would provide a way of connecting with the existing communities who see that period in history all around them.

Conclusion

The Diocese of Rochester can see many benefits to the immediate and surrounding area of the development project by London Paramount on the basis of significant regeneration. However, whilst we acknowledge the proposals are still in development, there is a need to address the community impacts, and the wins that can be secured for developer and community alike.

The intention in making comment at this stage is to assist and support the applicant by raising issues at the early stage in order that any work undertaken to inform the EIA is sufficient.

At this stage of its development the scoping has helpfully pointed out the significant lack of depth and coverage of analysis and thinking around the socio economic effects and benefits, and the Diocese of Rochester considers it a vital requirement that additional work and information is carried out and provided to allow assessment of the effects to surrounding communities.

Yours sincerely,

Matthew Girt
Director of Strategy and Implementation

