

Tilbury2

Written Representation by London Resort Company Holdings (LRCH)

DESCRIPTION OF THE SITE AND SURROUNDINGS

Site context

The Project Site lies approximately 30 km east-south-east of Central London on the south bank of the River Thames, in the county of Kent. The Project Site occupies much of the Swanscombe Peninsula, formed by a meander in the river, and includes a corridor for transport connections extending generally southwards to the A2(T) trunk road.

The Project Site is bisected by the municipal boundary between the boroughs of Dartford to the west and Gravesham to the east. It lies mostly in the designated area of the Ebbsfleet Garden City, established in March 2015.

The urban areas of Stone, Greenhithe, Ingress Park and Swanscombe lie to the west and south of the site. These are largely residential in character, with commercial uses concentrated on Stone's river frontage. To the east of the Project sites lies Northfleet, a neighbourhood of mixed residential and commercial uses.

Each of these settlements has a district centre providing community, retail and commercial services. The locality is also served by the principal town centres in the two boroughs, at Dartford and Gravesend (in Gravesham). Beyond Greenhithe to the south-west of the Project Site lies Bluewater Shopping Centre. This is a significant retail development that provides 154,000 m² of retail floorspace and 13,000 car parking spaces on a 97 ha site. In April 2017, Dartford BC resolved to grant planning permission for an expansion in total retail and catering floorspace of up to 30,000 m². Car parking at the centre will be maintained at current levels.

To the south of the A2(T) the land is more open and rural in character, with small settlements amid farmland and woodland blocks. Most of this area lies in the Metropolitan Green Belt.

The north bank of the River Thames opposite Swanscombe Peninsula is also extensively developed. Local settlements include West Thurrock, South Stifford, Grays and, to the north-east, the major port and town of Tilbury. Both banks of the estuary feature wharves, jetties and port-related uses, some of which are inactive.

The principal rail links in the locality include the High Speed One (HS1) railway, which provides high-speed connections between London and various destinations in Kent and Eurostar train

connections between London, Paris, Brussels and other European cities. Ebbsfleet International Station is located to the south of Swanscombe Peninsula. The railway passes partly in cutting and partly in a tunnel beneath Swanscombe Peninsula *en route* to and from London St Pancras International Station. The North Kent Line, which crosses the southern edge of the Swanscombe Peninsula in an east-west direction, provides local services between London and North Kent and onwards to the Kent coastal towns by way of the Kent Coast Line, with nearby stations at Greenhithe, Swanscombe and Northfleet. All three stations are located outside of the project site.

Strategic highway routes in the locality include the A2(T), which provides a connection between Junction 2 of the M25 motorway to the west and Junction 1 of the M2 motorway beyond Gravesend to the east. The Dartford Tunnels and Queen Elizabeth II Bridge crossings of the River Thames lie approximately 3km to the west of the site. Highways England has consulted on options for a new road between Kent and Essex, known as the Lower Thames Crossing. On 12 April 2017 the Secretary of State for Transport announced that the preferred route for the Lower Thames Crossing is a bored tunnel passing under the River Thames east of Gravesend and Tilbury.

The principal local roads adjacent to the Project Site include the A226 London Road / Galley Hill Road that runs east-west across the southern side of the Swanscombe Peninsula, with the B255, B259 Southfleet Road and the B262 / A2260 Springhead Road providing north-south links between the A226 and the A2(T).

The locality has a distinctive landform, modified considerably by human activity. From the low-lying banks of the Thames the terrain generally rises southwards to a ridge that is typically 25m above ordnance datum (AOD). However, the natural topography has been altered considerably by extensive mineral workings – principally the quarrying of chalk for the manufacture of cement and other building products. The extensive voids created by mineral extraction include Eastern Quarry to the south-west of the Project Site, which benefits from existing planning approval for predominantly residential development and forms part of the Ebbsfleet Garden City initiative established by the Ministry of Housing, Communities and Local Government (MHCLG). Some of these former chalk pits have also been used for waste landfill, including an area to the west of HS1 within the Project Site. Areas of the peninsula have been tipped with substantial quantities of Cement Kiln Dust (CKD), a by-product of the cement industry. Part of this material has been over-tipped with dredgings from the River Thames.

The Project Site

The Project Site comprises approximately 552 hectares of land in a complex shape. The Project Site comprises land on and to the south of the Swanscombe Peninsula, and a corridor of land required for transport connections running in a broadly north-south direction between the Peninsula and the A2(T). The Project Site also includes an approximately 3.5 km length of the A2(T) corridor between established junctions at Bean in the west (A2(T) / B255) and Pepper Hill (A2(T) / B262) in the east. The Project Site is split into two distinct areas: the Swanscombe Peninsula on which the majority of the Entertainment Resort is proposed, and the Access Corridor running south towards and then along the A2(T).

The Ordnance Survey grid references for the approximate extremities of the Swanscombe Peninsula and the Access Corridor are as follows (expressed as eastings and northings):

Swanscombe Peninsula

- 559534, 175453
- 560637, 176707
- 561157, 175784
- 560524, 174892

Land between Swanscombe Station and the A2(T)

- 560652, 174723
- 561061, 174665
- 561199, 172820
- 561721, 172819

A2(T) corridor

- 558409, 173144
- 558263, 172651
- 561338, 172000
- 562453, 172059

The majority of the Project Site within the Swanscombe Peninsula comprises open, low-lying land with extensive former CKD tips and other brownfield former-industrial land. A number of drains, aeration lagoons and other features are also present. Much of the peninsula has re-vegetated naturally but areas of bare ground remain. Other parts of the Project Site on the Swanscombe Peninsula include the existing Manor Way, Northfleet and Kent Kraft industrial estates.

The HS1 railway crosses the Peninsula on a south-east to north-westerly alignment. The southern section is in cutting and the remainder in a tunnel. A pumping station that serves the tunnel is located to the north-east of the tunnel portal.

The Swanscombe Peninsula supports extensive areas of marshland including Black Duck Marsh, Botany Marsh and a marsh around the HS1 tunnel portal. Broadness Marsh, at the northern tip of the peninsula was historically a saltmarsh, but now has a raised terrain as a result of CKD tipping and the deposition of river dredgings. Broadness and Botany Marsh are bordered in part by industrial estates.

The Project Site has an irregular topography because of the historic CKD tipping activities and the deposition of dredgings from the River Thames. Two raised areas of tipped material rise to over 12-13 m above ordnance datum (AOD). A large part of the north of the peninsula has been raised from an assumed original height of 2-3 m AOD to approximately 8.75 m AOD. Where it meets the River Thames, the Peninsula is surrounded by flood defence embankments and terraces that rise to approximately six metres AOD. Small areas of remnant salt marsh are located at the base of the flood defences.

In terms of its underlying geology, the Project Site lies in the eastern part of the London Basin, which is underlain by chalk. This chalk is designated by the Environment Agency as a principal aquifer and is the main source of potable water in the area. The majority of the Project Site thus lies within a groundwater Source Protection Zone (SPZ). The Peninsula itself is overlain by alluvium, comprising silts and clays.

The banks of the Peninsula feature occasional jetties and inlets, some of which are used for the mooring and landing of boats. An inlet at the northern end of the Peninsula, Broadness Creek, has associated boat sheds. A small number of public footpaths cross the Project Site including Saxon Way, which runs along the western flood embankment.

High voltage electricity transmission lines cross the Peninsula on a south-east to north-westerly alignment, and include a 190 m tall 'super pylon' in the north of the Project Site that lifts the transmission lines over the Thames to a similar tower on the northern bank. These lattice towers are the UK's tallest electricity pylons and are prominent local landmarks.

North of the HS1 tunnel portal is a derelict wastewater treatment works. A Port of London Authority radar beacon is located near the northern tip of the Peninsula.

Natural habitats on the Project Site include patches of woodland, scattered areas of scrub and improved and semi-improved grassland. Wetland habitats include wet grasslands at Black Duck Marsh and grazing marsh and reed beds in Black Duck and Botany Marshes, with ponds of standing open water and drainage ditches. There are also fragments of saltmarsh and mudflats within the flood defence embankments.

The project Site does not contain any international or national wildlife designations. Part of the Ebbsfleet Marshes Local Wildlife Site (LWS TQ 619738), which includes wet woodland and reed beds, is located in the Ebbsfleet Valley part of the Project Site.

Areas of degraded post-industrial land, including disused pits and landfilled areas supporting mostly grassland and scrub, extend across the section of the Project Site that extends southward

towards the A2(T). This area also contains a large surface level car park and associated roads serving Ebbsfleet International Station.

The A2(T) / A2260 junction (referred to here as Ebbsfleet Junction) allows eastbound and westbound traffic to leave and join the A2(T) at the southern end of the Project Site. Springhead Nurseries and the HS1 railway are located to the immediate east of the A2(T) / A2260. A large electricity compound is located immediately to the west although part of this is no longer in use and the site is currently being developed for housing, a school and a hotel. Agricultural fields and some isolated farm buildings and dwellings are located to the south of the junction. A large disused works and chalk pits are located immediately to the north of the A2(T) between the A2(T) / A2260 and A2(T) / B255 (Bean) junctions.

The Pepper Hill (A2(T) / B262) junction provides access to Northfleet to the north and Northfleet Green, Southfleet and Betsham to the south. The (A2(T) / B255) junction at Bean provides connections to Stone and Greenhithe via the B255 and the A296. Blocks of woodland border the A2(T) at the A2(T) / B255 junction. Bluewater Shopping Centre is located less than 1km from this junction and is reached directly from the B255. At Greenhithe the B255 connects to the A226, which provides access to the Swanscombe Peninsula from the west.

PROJECT DESCRIPTION

Overview of the Proposed Development

The 2008 Act provides that development consent may be granted for both a Nationally Significant Infrastructure Project (NSIP), referred to as the 'Principal Development' in this document, and for 'Associated Development', which is development associated with the Principal Development.

In the description of development below, a distinction is made between the Principal Development, which comprises all works proposed within what would be the Entertainment Resort, and Associated Development, comprising other development that has a direct relationship with the Principal Development and is required to support its construction or operation ¹.

Certain works to the A2(T), might comprise a nationally significant infrastructure project in their own right under s.22 of the 2008 Act. Whilst these works are 'associated' with the Principal Development, they are referred to as the 'A2 Highways Works' for the sake of clarity in this document.

¹ Associated development is defined within Annex A of the Department for Communities and Local Government *Guidance on associated development applications for major infrastructure projects* (April 2013)

In summary, the **Principal Development** includes:

- land remediation works;
- the Leisure Core, comprising a range of events spaces, themed rides and attractions, entertainment venues, cinema, theatres and nightclubs, developed in two phases known as Gate One and Gate Two, along with entrance plazas for Gates One and Two and ancillary retail, dining and entertainment facilities;
- landscape works and planting;
- car parks;
- the A2 Highways Works comprising a signalised at-grade gyratory junction to replace two existing roundabouts at the A2(T) / B259 junction

The **Associated Development** includes:

- five hotels providing budget, family, upmarket, luxury and themed accommodation totalling up to 3,550 rooms or suites. The family hotel will incorporate a water park;
- a 'Back of House' Area accommodating many of the necessary supporting technical and logistical operations to enable the Entertainment Resort to function.
- a people mover and transport interchange;
- resort access road;
- local transport links;
- river transport infrastructure;
- service infrastructure;
- flood defence works;
- habitat enhancement and public access;
- security and safety provisions.

The Principal Development and Associated Development are described below. All floorspace areas cited below are Gross External Areas.

The DCO must be sufficiently flexible to enable change to occur post-consent. The DCO application will therefore be based on parameter plans and work within Rochdale Envelope

parameters.

Principal Development

Land remediation

The DCO will provide for the remediation of contaminated areas of the site, including the capping of CKD and contaminated river dredgings, the removal or capping of industrial waste tips and the profiling of land for the purposes of the development.

The Leisure Core

At the heart of the proposed development will be a range of entertainment experiences in a series of themed zones, incorporating events spaces, themed rides and attractions, entertainment venues, cinema, theatres and nightclubs. These will be developed in two phases, comprising a 56.9 ha area known as Gate One and a 24.8 ha area known as Gate Two, which each phase subdivided into a series of themed 'lands'. These lands will reflect agreements with intellectual property (IP) providers and will include rides and attractions suitable for families, children and the more adventurous thrill-seeking visitor. As noted, the content of the lands will be changed or updated from time to time in line with evolving market demand and the draft DCO incorporates the flexibility to do this.

Retail and amenity facilities, including a range of restaurants, cafes and coffee shops linked to the Entertainment Resort experience, will be integrated into Gates One and Two for the enjoyment and convenience of visitors.

The visitor entrance will provide ticketing and ancillary commercial uses. Resort visitors arriving by car, train, people mover, bus, coach, taxi, river ferry, bicycle or on foot will all be directed towards the entrance plazas from their respective points of arrival.

Adjacent to the entrance plazas outside of Gates One and Two, up to 26,000 m² of ancillary retail, dining and entertainment (RDE) floorspace will be provided in a 7.6 ha area, excluding hotels. In conjunction with these RDE facilities the entrance plazas will establish a strong sense of arrival and serve the needs of visitors.

In the evening, a combination of theatres and indoor and outdoor venues in Gates One and Two and the RDE area will provide West End quality productions and shorter format shows. These venues will showcase content from the intellectual property providers, as well as provide a stage for live comedy acts and concerts. A number of nightclubs will provide late-night entertainment options. The RDE area will include a covered events space providing for up to 3,000 seated visitors, which will be used flexibly for concerts, live television productions, exhibitions and conventions. It will also include a cinema.

Landscape

A hard and soft landscape strategy, including amenity water features such as ponds and

watercourses, will provide the setting for rides, attractions and amenities within the Leisure Core. It will also contribute to the theme and branding of each attraction. Green and brown roof systems will be used where appropriate to add diversity of appearance to the built form and to encourage biodiversity. Where necessary, earth shaping will be used to create the particular landscape required for the Leisure Core and to provide a flood resilient design.

Comprehensive landscape works and planting are proposed on the periphery of the Leisure Core. A perimeter service road and security fence around the leisure core will be integrated into this boundary landscape treatment.

Car parks

A maximum provision of 13,000 permanent spaces is proposed, comprising 8,000 visitor parking spaces in four multi-storey car parks with up to ten decks and floorplates of 9,000 m², along with 2,420 hotel guest parking spaces and 2,580 staff parking spaces. Also proposed are 150 coach parking spaces, 350 motor cycle parking spaces and 250 secure cycle spaces for visitors. Collectively these parking areas would occupy a gross land area of 12.6 ha.

A2 Highway Works

The purpose of the proposed A2 Highways Works is to separate local and resort traffic close to the point where it leaves the A2(T), with all resort traffic directed onto the resort access road described under the Associated Development heading below. Two existing roundabouts at the A2(T) / A2260 junction would be replaced by a signalised at-grade gyratory junction, from which the resort access road would branch off towards the resort. This proposed junction would likewise reintegrate departing visitor traffic with local traffic flows to ensure their smooth transfer on to the A2(T).

Associated Development

Hotel accommodation

A range of hotels with a total capacity of up to 3,550 rooms or suites and a combined total land-take of 11.4 ha will provide overnight accommodation for visitors. The hotels will be located between Gate One and Two. Visitors will be offered a range of luxury, family and economy hotels to suit different tastes and budgets. Some of the hotels will be themed to provide a strong linkage with other Entertainment Resort attractions. The family hotel will incorporate a covered water park attraction that will be available to all resort guests. Up to 2,500 rooms or suites are associated with Gate One and up to 1,050 rooms or suites are associated with Gate Two. They will be served by 2,420 dedicated parking spaces as a part of the overall parking provision for the site.

Back of house area

A back of house area will accommodate many of the necessary supporting technical and logistical

operations to enable the Entertainment Resort to function. These include administrative office accommodation, staff car parking, engineering workshops and maintenance sheds, a staff training centre, storage and food preparation facilities. A training centre is essential in order to ensure that staff are instructed in and understand the brand values that the Entertainment Resort wishes to promote and receive the highest standards of training and continuing professional development in hospitality, entertainment and attendant security, health and safety considerations.

People mover and transport interchange

A 1.2 km people mover route is proposed to connect a dedicated Resort travel interchange located to the west of Ebbsfleet International Station to the Leisure Core. The route would be used exclusively by a dedicated fleet of articulated shuttle buses, each with a capacity of 100-150 passengers. The Resort development will incorporate parking, maintenance and vehicle washing facilities for the shuttle buses. Provision will also be made in the Resort for local bus and taxi services and disabled access.

The proposed transport interchange beside Ebbsfleet International Station will include a 'pick up and drop off' area for the people mover system and bus stops for *Fastrack* - a Kent County Council rapid transit bus service. The transport interchange will include basic facilities for passengers including shelters, waiting rooms, ancillary retail and refreshment facilities, toilets and staff offices.

Where necessary, the existing Network Rail (High Speed) Limited facilities at Ebbsfleet International Station, including taxi and coach pick up / drop off areas and parking, will be relocated to a convenient location nearby.

Resort access road

A new four-lane resort access road approximately 2.3 km in length will provide the sole means of visitor access by private car between the A2(T) / A2260 junction and the Leisure Core. The access road would run parallel to the existing HS1 railway and would provide direct access to the proposed parking facilities. Access for visitors in private vehicles will not be available from the local road network. Existing roads would continue to provide access to Swanscombe and Northfleet, unimpeded by visitor traffic to the Proposed Development.

The Resort access road will include:

- a) the construction of up to four bridges and associated wing walls and retaining walls and up to eight tunnels;
- b) the construction of a private means of access to land adjacent to the highway works;
- c) diversion and protection works to existing public utility apparatus, as required to accommodate the proposed works;

- d) drainage works, drainage attenuation ponds, earthworks, pavement works, kerbing and paved area works, signing and road marking works, street lighting works, safety barrier works, traffic signals, fencing works, landscaping works, noise mitigation barriers and other works associated with the construction of the permanent highway;
- e) the construction of an unadopted two-lane dual carriageway access road;
- f) highway works comprising the construction of a signalised at-grade gyratory road system to replace the existing two roundabouts at the A2(T) / A2260 junction;
- g) the provision of ecological mitigation works including mitigation measures to the River Ebbsfleet corridor.

Local transport links

A network of pedestrian and cycle routes will be provided on the Swanscombe Peninsula and will connect to the adjacent residential areas of Greenhithe, Swanscombe and Northfleet. This will improve connectivity within existing neighbourhoods and create linkages between the network of green spaces.

Existing public transport services will be enhanced to encourage non-car modes of travel to the Proposed Development. This will include discussions with operators regarding improvements to bus routes and services (e.g. the extension of *Fastrack* to the Leisure Core) and additional rail capacity where required to meet visitor demands.

A staff travel plan will be implemented to promote car sharing and non-car based transport modes for staff. An event management plan will explain how the car parking spaces will be used throughout the year and in response to specific events at the Proposed Development. Both plans are likely to be secured pursuant to DCO Requirements.

The DCO will include provision for the alteration, diversion, stopping up and/or improvement of local roads, accesses and other rights of way where necessary, and for associated signage;

River transport infrastructure

Subject to further structural assessment, remedial works will be carried out to the existing White's Jetty and Bell's Wharf to enable use for construction and service deliveries and the removal of waste. In addition, a new floating pontoon jetty is proposed between Bell's Wharf and Ingress Park for use by Thames Clipper passenger ferry services between the Resort and central London.

Service infrastructure

The Proposed Development will incorporate comprehensive provisions for service infrastructure provision, with an emphasis on resilience and sustainability. The strategy will embrace electricity and heat supply, water supply and the sustainable management of waste and wastewater, and will incorporate:

- a dedicated combined heat and power (CHP) plant with an electrical generation capacity of up to 30MW. The CHP plant will occupy a site up to 2,400 m² in area with a building footprint of up to 1,500 m². The CHP building will be up to 18 m high to ridge, with a stack up to 40 m in height;
- an electricity sub-station with a capacity of up to 60 MVA. The substation will occupy a site up to 2,500 m² in area with a building footprint of up to 1,600 m².
- a dedicated waste management facility on a site up to 1 ha in area, containing a materials recovery facility (MRF), an anaerobic digestion plant and ancillary offices.
- a wastewater treatment works at Broadness Marsh on a site up to 6 ha in area. Treatment facilities will largely be contained in buildings and will be served by an outfall to the River Thames;
- sustainable drainage systems across the Proposed Development to manage surface water flows and minimise the risk of pollution to the water environment.

Flood defence works

The Project Site will be defended from future flood events by building, improving and extending the existing earth berm around the Leisure Core and Project Site perimeter. These works will accord with the Environment Agency's *Thames Estuary 2100* strategy.

Habitat enhancement and public access

Retained habitats including Broadness and Black Duck Marsh are in variable condition and will be subject to landscape and habitat improvement works for wildlife including birds, reptiles, invertebrates and plants. Managed public access will be incorporated into these areas and it is proposed also to create a continuous pedestrian route along the edge of the peninsula (i.e. a Thames path) so that visitors and members of the public can enjoy walks along the edge of the river. This will help to connect the Proposed Development and local communities with the river environment and to provide an attractive entrance for visitors arriving by the River Thames. The path will form a section of the Grain to Woolwich section of the England Coast Path, which is being developed by Natural England in accordance with the Marine and Coastal Access Act 2009.

Aside from the inherent visual and biodiversity benefits, the areas of retained habitat will serve as quiet zones for visitors, affording opportunities to relax in natural surroundings and to appreciate the local ecology and views over the river. These zones will form part of a network of green spaces that will link with other parts of the Project Site and the wider area. Areas of the marshes will be protected to provide undisturbed use by wildlife.

Where the loss of habitats cannot be adequately mitigated within the Project Site, a range of compensatory habitats will be created at off-site locations. These will comprise a range of wetland habitats that might include a mix of reed beds, standing open water and grazing marsh, along with dry habitats, including bare ground, grassland and scrub mosaic. The creation of these

compensatory habitats will, as far as possible, connect to, and be in close association with, similar habitat types that are already established in the Thames estuary corridor. LRCH will seek to work with national and local agencies and stakeholders to achieve the best outcomes for nature conservation through the provision and long-term management of these compensatory habitats.

Security and safety provisions

A security strategy will be implemented to promote a safe environment and minimise the potential for crime to occur. The strategy will comprise a mixture of built design measures including a secure fence set amongst vegetation, security technologies and security staffing measures. The Proposed Development will also include ancillary medical and fire response facilities to manage accidents and emergencies. A helipad will be provided for medical evacuation and occasional VIP use.

Other provisions

The DCO will also include provision for:

- demolition of existing buildings and structures within the DCO Order Limit;
- drainage works;
- lighting;
- public art;
- hard and soft landscape works, incorporating earth shaping and planting;
- works to protect features of archaeological and paleontological interest;
- ancillary emergency response facilities (i.e. medical and fire points).

Construction activities

The construction of the Proposed Development will occur over two main phases and will include:

- security set up activities;
- ecological management including habitat protection and species relocation;
- Project Site clearance;
- ground treatment and CKD remediation activities;
- soil investigation work and treatment;

- archaeological investigations;
- land re-profiling;
- construction of tunnels through chalk spines;
- construction of vehicle haulage routes;
- improvements to the existing Bell's Wharf and White's Jetty;
- construction of laydown, storage compounds and welfare areas;
- establishment of a concrete batching plant on site;
- on-site temporary facilities for construction workers (including parking, residential accommodation, staff rooms, changing rooms, toilets, medical facilities etc.);
- identification, relocation, and enhancement of utility infrastructure;
- diversion of some existing drainage features.

Detailed construction information will be provided in a Construction Method Statement (CMS) incorporating a Construction Environmental Management Plan (CEMP) and a Construction Transport Management Plan (CTMP), which would be submitted for approval and enforced by a DCO Requirement.

Decommissioning

The Proposed Development has no specified end date and is a permanent attraction that will evolve over time. Where appropriate, planning permission will be sought from Dartford Borough Council and / or Gravesham Borough Council for any future changes.

Subject to DCO Requirements, where rides are to be replaced during the lifetime of the Proposed Development, a decommissioning statement will be submitted to, and approved by, the relevant planning authority. ♦