

# Dartford Local Plan Pre- Submission (Publication) September 2021 Town and Country Planning (Local Planning) England Regulations 2012 – Regulation 19 Representation Form

Representations on the Dartford Local Plan should be submitted by **5pm on Wednesday 27<sup>th</sup> October 2021**. **Late representations will not be accepted.**

Representations should be made using this form and submitted to Dartford Borough Council by email to [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk) or sent to: Planning Policy Team, Dartford Borough Council, Civic Centre, Home Gardens, Dartford, Kent DA1 1DR.

Additional copies of the form can be obtained from the Council's website at: <https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/new-local-plan>. Photocopies of blank forms can also be made.

Advice on how to make representations is provided in the guidance notes which accompany this form. You are strongly advised to read the guidance notes before completing this form. ***Please note that if you responded to the previous version of the Pre-Submission Local Plan February 2021, your previous representation will not be automatically carried forward and you will need to respond again.***

This form comprises 3 parts:

- Part 1: Your details
- Part 2: Your representation(s). Please fill out a separate sheet for each representation you wish to make. However, only fill in Part A once and send all representations in together.
- Part 3: Declaration

If you have any queries about this consultation, please contact the Planning Policy Team by emailing [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk) or by phoning 01322 343213.

You only need to fill this section out once.

## Part 1: Your details

You only need to fill this section out once

	1. Personal details	2. Agent details (if applicable)
Title	Mr	Mr
Name	Andy Martin	Chris Potts
Organisation / group	London Resort Company Holdings Limited	Savills (UK) Limited
Address 1	c/o Agent	
Address 2		
Address 3		
Postcode		
Telephone number		
Email address		

If you are replying on behalf of a group, how many people does it represent?

## Part 2: Representation

### For office use only

Consultee ID:

Agent ID:

Date Received: :

Please use a separate sheet for each representation

Name or Organisation:	London Resort Company Holdings Limited
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### 1. To which part of the Local Plan does this representation relate (please specify paragraph or policy number)?

Paragraph

Various

Policy

Various

Policies Map

Various

### 2. Do you consider the Local Plan is:

Please mark with a cross in the boxes as appropriate

(1) Legally compliant

Yes

Various

No

Various

(2) Sound

Yes

Various

No

Various

(3) Complies with the  
duty to co-operate

Yes

No comment

No

No comment

### 3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see letter and appendices (Savills, 27 October 2021)

(Continue on a separate sheet / expand box if necessary)

**4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 3 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please see letter and appendices (Savills, 27 October 2021)

(Continue on a separate sheet / expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?**

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing sessions(s)

☒

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.**

Please see letter and appendices (Savills, 27 October 2021)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they may wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

## Part 3: Declaration

### Data Protection

The personal information you provide on this form will be processed in accordance with the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003. The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004, and may be used by the Council to contact you, if necessary, regarding your submission. Under Regulation 22, we have a duty to send all representations to the appointed Planning Inspector. Your name, organisation name (if relevant), comments and town/parish of residence will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and we will not publish any personal data beyond what is stated in this declaration.

**Please sign and date this form.** Forms signed electronically will be accepted.

### Declaration:

**By completing and signing this form, I agree to my name, organisation, town/parish of residence and representations being made available for public inspection.**

**Signature:**

C Potts

**Date:**

27/10/2021

27 October 2021



**VIA EMAIL**

Mark Aplin  
Planning Policy Manager  
Dartford Borough Council  
Civic Centre  
Home Gardens  
Dartford  
Kent  
DA1 1DR

Christopher Potts  
[www.savills.co.uk](http://www.savills.co.uk)

Dear Mr Aplin,

**REVISED PRE-SUBMISSION DARTFORD LOCAL PLAN TO 2037 (PUBLICATION) DOCUMENT  
(SEPTEMBER 2021) CONSULTATION**

**REPRESENTATIONS SUBMITTED ON BEHALF OF LONDON RESORT COMPANY HOLDINGS LIMITED**

Savills is instructed on behalf of London Resort Company Holdings Limited ("LRCH") to submit representations on the consultation to the Revised Pre-Submission Dartford Local Plan to 2037 (Publication) Document (September 2021) ("RPSDLP").

The comments are structured so as to first identify the background, significance and scale of the London Resort as a global entertainment resort (**Part 1**). Overarching comments on the RPSDLP's strategy and approach are then provided (**Part 2**) followed by detailed comments on a large number of specific aspects of the RPSDLP and corresponding modifications required for the document to be found sound (**Part 3** and **Appendix 5**). The comments end with conclusions and recommendations (**Part 4**). As per the previous approach agreed with Officers, one Representation Form has also been enclosed.

Overall, the comments provided on behalf of LRCH raise significant concerns with the strategy and approach being pursued by the RPSDLP and a failure to fully recognise, plan-for and harness the potential of the London Resort. This failure to plan for the London Resort is all the more surprising given that Dartford Borough Council's ("DBC") Cabinet supports this transformational regeneration of a contaminated site, with the provision of a world-class global scale entertainment resort.

LRCH would welcome the opportunity to engage with DBC in a positive and constructive manner on how the RPSDLP can be recast to reflect on the significant opportunities presented by the London Resort.

**PART 1: BACKGROUND TO THE LONDON RESORT**

LRCH is progressing the London Resort on the Swanscombe Peninsula which is formally designated as a Nationally Significant Infrastructure Project ("NSIP") by the Secretary of State for Levelling Up, Housing and Communities. The London Resort will be a world class global entertainment resort set in over 400 hectares of land and will facilitate the regeneration of significant areas of previously developed (brownfield and contaminated) land, much of which falls within the administrative boundary of DBC, representing in excess of £2.5 billion investment that will generate significant economic and employment opportunities both during construction and operationally in the decades to come. The London Resort will also enhance and protect wildlife and amenity areas of the various marshes as part of a comprehensive biodiversity strategy.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Registered office: 33 Margaret Street, London, W1G 0JD



LRCH is committed to engagement on all aspects of its proposals and has undertaken five stages of statutory and non-statutory consultation encompassing widespread engagement with statutory consultees, stakeholders and members of the public. The most recent, stage five, consultation ran from July-September 2020. LRCH therefore has a considerable database of stakeholders and feedback on the scheme and issues to be addressed.

LRCH submitted its Development Consent Order (“DCO”) application to the Secretary of State, via the Planning Inspectorate (“PINS”) on 31 December 2020 and was formally accepted by PINS for examination on 28 January 2021. Subject to receiving development consent, it is LRCH’s intention to commence development immediately to be in a position to open Gate One of the London Resort, followed by Gate Two. Annual visitors are expected to reach 12.5m at maturity.

In this regard it is worth reiterating the substantial economic benefits expected to arise from the London Resort and the unique opportunity for DBC to benefit from and capture the benefits for communities and businesses for decades to come. LRCH’s commitment to delivery upon receiving development consent which should be material in the decision-making process on which option(s) to pursue. For example, the London Resort will:

- Represent an investment of over £2.5 billion;
- Attract 12.5m visitors a year at maturity;
- Generate up to £70m spending by domestic and international tourists visiting the London Resort in the local area per annum at maturity, including spending on hotels, restaurants, travel alongside other spending in the local area; and
- Provide for a significant number of direct employment opportunities, with an estimated 17,310 workers (11,215 FTEs) at maturity upskilling the local workforce and adding to the local, regional and national economy. The London Resort will support up to 48,000 direct, indirect and induced jobs by maturity, creating knock on benefits to the economy. The London Resort has an Employment & Skills Strategy created alongside the local authorities, education providers and training organisations to ensure the residents of Dartford and its communities have significant opportunities.

The DCO Order Limits covers an area falling within the administrative boundaries of DBC, Gravesham Borough Council (“GBC”) and Thurrock Council (“TC”). The project also falls within the administrative areas of Kent County Council (“KCC”) and the Ebbsfleet Development Corporation (“EDC”). LRCH therefore actively monitors all relevant publications and consultations across these organisations and geographical area, providing consultation responses as appropriate to ensure the comprehensive and joined up delivery of the London Resort.

## **PART 2: OVERARCHING COMMENTS**

The Dartford Local Plan (“DLP”) aims to replace the existing Dartford Core Strategy (September 2011) and the Dartford Development Policies Plan (July 2017) and form the statutory development plan for use in decision-making across the Borough in accordance with Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004. Any replacement will be contingent upon the DLP being suitable for scrutiny and consideration against current circumstances and future potential and ambition.

LRCH’s DCO application is to be assessed and determined in accordance with the Planning Act 2008. However, LRCH is mindful that an up to date development plan can provide valuable information on local planning, land use and environmental considerations that may assist in the Examining Authority’s assessment and recommendation of the application and, ultimately, the determination of the DCO by the Secretary of State should he see such as relevant and important to his decision, in accordance with Section 105 of the Planning Act 2008.

For this reason, on behalf of LRCH, Savills has previously engaged with DBC in the preparation of development plan documents within the Borough, identifying and repeating in numerous consultation responses the strategic significance of the London Resort as a NSIP in terms of its transformational opportunity, economic dividend, social opportunities and environmental benefits. Consultation responses have been provided in respect of the:

- Dartford Development Policies (Pre-Submission) Consultation (December 2015) (see **Appendix 1**);
- Dartford Strategic Issues Consultation (Regulation 18) (June 2018) (see **Appendix 2**);
- Dartford Preferred Options Consultation (January 2020) (see **Appendix 3**); and
- Dartford Pre-Submission Dartford Local Plan to 2037 (Publication) Document (February 2021) (see **Appendix 4**).

These earlier representations highlighted the proposals for the London Resort and noted its significance, scale and the range of positive impacts it would deliver. The earlier representations also signalled how the DLP should better plan for and support the delivery of the London Resort. It is disappointing that these representations have not been reflected in the RPSDLP, especially given the extent of work being undertaken during 2020/21 in parallel on the RPSDLP and submission of the London Resort.

Outside of these formal consultations, LRCH and its representatives have been engaged with the Leader of DBC and Senior Officers across various departments (both individually and jointly with Officers from EDC, GBC, KCC and to some extent TC) with regards to the London Resort, and indeed there has been repeated support for the scheme. This engagement intensified during 2017/18 and again more recently during 2020/21 as the London Resort reached a significant project milestone of the submission of its DCO application and subsequent Acceptance by PINS.

As such, DBC has been kept fully informed as to the emerging proposals for the London Resort, both through formal 'plan-making' consultations and engagement on development management matters.

In light of the above, LRCH is disappointed and concerned to learn of the somewhat distant and negative approach that continues to be taken in respect of the London Resort within the RPSDLP. Regrettably, on this basis, we find the RPSDLP fundamentally fails all four of the tests of soundness set out in Paragraph 35 of the National Planning Policy Framework (July 2021) ("NPPF") finding that it is neither positively prepared, justified, effective nor consistent with national policy. LRCH therefore has serious concerns with regards to its scrutiny during Examination in Public ("EiP").

While the London Resort is acknowledged and referenced within the RPSDLP in a handful of places, these are presented as an 'after thought' with it evident the RPSDLP has not been prepared in a way which embraces the significant economic, environmental and social opportunities presented by the London Resort. Rather, and disappointingly, the approach of the RPSDLP appears to have been to leave the London Resort all but 'outside' with an indication the successful delivery of the London Resort will trigger a review of the DLP. In our view this does not reflect the requirements of Paragraph 16b) of the NPPF which requires development plan documents to *"be prepared positively, in a way that is aspirational but deliverable"* and also fails to satisfy the four tests of soundness set out in Paragraph 35 referenced above.

As a result, LRCH strongly believe that in pursuing a strategy that fails to adequately take account of the London Resort the RPSDLP is not fit for purpose and must be found unsound. LRCH is of the strong view that the opposite approach should be taken with the London Resort fully integrated into the strategy, objectives and finer detail of the DLP from the outset. LRCH consider that the NPPF places a clear requirement upon DBC to prepare and undertake its Local Plan review positively, with aspiration and with the presumption in favour of sustainable development. As currently drafted, the RPSDLP does not achieve this.

It is regrettable that LRCH find itself in a position of strongly objecting to the RPSDLP but in light of the comments above and the detailed comments that will follow in these representations (see **Appendix 6**), the importance of LRCH as a key stakeholder in the Borough and on the emergence of the DLP is well-founded. It goes without saying that LRCH's will look to engage further with the EiP should the RPSDLP continue in its current trajectory.

## Overlapping timescales

As noted previously, the London Resort DCO application was submitted to the Secretary of State (via the Planning Inspectorate) on 31 December 2020 and subsequently 'Accepted' for examination on 28 January 2021. As the timescales of examination are prescribed under the Planning Act 2008, there is certainty with regards to when a decision can be expected on the London Resort DCO once Examination commences. While the same cannot be said for the examination of the RPSDLP, indicative timescales are set out within the Local Development Scheme 2021. When comparing the timescales (see **Appendix 5**) it is clear there is a significant degree of overlap which is likely to cause procedural and technical difficulties in advancing the RPSDLP to adoption should development consent be made for the London Resort.

It is possible that a decision on the London Resort will be made while the RPSDLP is still under examination which is likely to cause significant discomfort to the examination, possibly requiring the suspension of the examination for DBC to consider the implications upon the soundness of the RPSDLP given its current omission.

Moreover, it is anticipated some enabling works to deliver the London Resort may progress outside of the DCO process, following permissions secured via the Town and Country Planning Act 1990. This will seek to ensure the effective delivery and start of construction on site as soon as possible should development consent be made. This planned approach is designed to enable an implementation of the DCO itself very soon after a decision is made, possibly meaning a material start to implementing the DCO on site before the DLP is even adopted. In such a scenario, it is considered the strategy and approach taken in the DLP would be woefully inadequate requiring an almost instantaneous review of the DLP such is the significance and materiality of the London Resort. This further reinforces LRCH's view that the RPSDLP must progress in a manner that fully recognises and plans for the London Resort.

## PART 3: DETAILED COMMENTS

As you will be aware, the examination of Local Plans seeks to assess whether they have been prepared in accordance with legal and procedural requirements and can therefore be found 'sound'. Paragraph 35 of the NPPF identifies the four tests of soundness as:

- "a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework."*

Detailed comments on individual chapters, paragraphs, policies and policies map that LRCH believe are relevant to the London Resort are provided at **Appendix 6**. These comments identify the areas of concern and which soundness test are/are not met and why. Regrettably, LRCH believe the RPSDLP fails to meet all four tests of soundness in that it has not been positively prepared, is not justified, is not effective and is not consistent with national policy.



## PART 4: RECOMMENDATIONS AND CONCLUSION

As identified within the comments above and the detailed comments provided at **Appendix 6**, there is a genuine and urgent need for DBC to reconsider the strategy taken within the RPSDLP with regards to the negative recognition of the London Resort. The comments and concerns set out are sufficient that LRCH believe it warrants a suspension of the RPSDLP and a requirement for the strategy, objectives and detailed approach to better align to the delivery of the London Resort.

Overall it is regrettable that DBC has taken the position to not engage with LRCH in its plan making process so that the RPSDLP fails to recognise the significant *positive* impacts of the London Resort.

Should you require any further information, please do not hesitate to contact me.

Yours sincerely,

pp.

**Christopher Potts**  
Director  
Savills

Enc. As above

Cc. Andy Martin, LRCH  
Sonia Collins, DBC

## Appendices

<b>Appendix 1</b>	Dartford Development Policies (Pre-Submission) Consultation (December 2015) – LRCH comments
<b>Appendix 2</b>	Dartford Strategic Issues Consultation (Regulation 18) (June 2018) – LRCH comments
<b>Appendix 3</b>	Dartford Preferred Options Consultation (January 2020) – LRCH comments
<b>Appendix 4</b>	Dartford Pre-Submission Dartford Local Plan to 2037 (Publication) Document (February 2021) – LRCH comments
<b>Appendix 5</b>	London Resort and Dartford Local Plan timescales
<b>Appendix 6</b>	Detailed comments
<b>Appendix 7</b>	Supporting evidence base

## **Appendix 1**

**Dartford Development Policies (Pre-Submission) Consultation (December 2015) – LRCH comments**

4 March 2016



**VIA EMAIL**  
**LDF@DARTFORD.GOV.UK**

Christopher Potts

Planning Policy Team  
Dartford Borough Council  
Civic Centre  
Home Gardens  
Dartford Kent  
DA1 1DR

Dear Sir / Madam,

**DARTFORD DEVELOPMENT POLICIES PRE-SUBMISSION (DECEMBER 2015) CONSULTATION**  
**REPRESENTATIONS SUBMITTED ON BEHALF OF LONDON RESORT COMPANY HOLDINGS**

On behalf of London Resort Company Holdings (LRCH), Savills is instructed to submit representations on the Dartford Development Policies Pre-Submission document (December 2015). Our representations can be found within this letter and the enclosed Representation Forms.

**London Paramount Entertainment Resort**

As you will be aware, LRCH is progressing the London Paramount Entertainment Resort (LPER), a recognised Nationally Significant Infrastructure Project (NSIP), on the Swanscombe Peninsula. The LPER will be the UK's largest leisure project on over 500 hectares of land, producing substantial regeneration benefits to the local, regional and national economies and enabling the creation of over 20,000 employment opportunities.

LRCH is committed to delivering the project and to date have undertaken significant statutory and non-statutory consultation encompassing widespread engagement with consultees, the Planning Inspectorate and members of the public since 2014. LRCH's expert team of consultants continue to develop the project, with a submission to the Planning Inspectorate anticipated in 2017.

While the LPER project is being progressed as a Development Consent Order (DCO) application to the Planning Inspectorate, the project covers an area falling within the administrative boundaries of both Dartford Borough Council and Gravesham Borough Council. The project also falls within the administrative areas of Kent County Council and the Ebbsfleet Development Corporation. LRCH is therefore actively monitoring the planning policy context and all relevant publications across these organisations and providing consultation responses as appropriate. Accordingly, LPER's representations to the Dartford Development Policies Pre-Submission document can be found within this letter and the enclosed Representation Forms.

**Dartford Development Policies Pre-Submission (December 2015)**

The Dartford Development Policies document, when adopted, will form part of the statutory development plan alongside the Dartford Core Strategy (September 2011). The document focuses on more specific development management policies aimed at implementing the strategic objectives of the Core Strategy, not least the regeneration and development of the Swanscombe Peninsula, to which the LPER project is a fundamental part.

*Paragraph 2.5, page 8*

LRCH support the recognition of the LPER as a NSIP within paragraph 2.5. Notwithstanding this observation, given the national significance of the project, we feel the document could go further in emphasising the economic, social and environmental benefits of the project, including:

- A catalyst for regeneration in the area including the delivery of the Ebbsfleet Garden City;
- Regeneration of a largely a brownfield site
- Multi-billion pound investment and benefits to local economies;
- Increased economic activity in the local area, leading to an associated increase in local spend;
- Over 20,000 employment opportunities;
- Up to 6,000 construction jobs;
- Becoming a centre for British innovation and creative businesses to grow;
- Improvements to the roads, ensuring that new infrastructure is in place; and
- A green network to include areas of environmental enhancement and wildlife habitat creation beside the River Thames.

LPER would welcome the opportunity to liaise with the Council on this matter.

*Proposals Map*

Diagram 7: Thames Waterfront Priority Area of the Core Strategy recognises the Swanscombe Peninsula as a 'Key Development Site'. In the four years since the Core Strategy was adopted, the LPER project has taken notable steps forward towards a DCO application and can now be afforded sufficient weight that warrants recognition within the accompanying Proposals Map. It would therefore seem appropriate for the local planning authority to acknowledge the extent of the LPER DCO Order limit within its Proposals Map, as per the enclosed. An accompanying explanation could be provided within the document (or a new policy) to support this identification and, again, LPER would welcome the opportunity to liaise with the Council on this matter.

I trust the above and enclosed representations may be taken into consideration in the progression of the Dartford Development Policies document. Should you require any further information or clarification in respect of these comments, please do not hesitate to contact me.

Yours faithfully,

**Christopher Potts**  
Director

Enc. Representation Form, Paragraph 2.5  
Representation Form, Proposals Map  
Draft DCO Order Limit

Cc. David Testa, London Resort Company Holdings  
Alex Lepez, Faithful + Gould

**REPRESENTATION FORM****Development Policies Plan**
**DARTFORD**  
 BOROUGH COUNCIL

For office use only

Reference No:

All respondents should complete Sections 1 to 3 of this form. You are requested to complete section 4 equalities monitoring form.

Further copies of this representation form are available via: [ldf@dartford.gov.uk](mailto:ldf@dartford.gov.uk)

**Section 1: Your Details and Consultation Procedures Feedback**

Name	Christopher Potts
Job Title (if relevant)	Director
Company/organisation name (if relevant)	Savills
Client's name (if applicable)	London Resort Company Holdings
Postal address	c/o Savills 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000
Email address	

Our Statement of Community Involvement says that we will keep consultation methods under review. We need your help with this please. You may also wish to give 'informal feedback'.

*Please indicate below how you became aware of the consultation.*

Email
-------

*Do you consider that the document is easy to read? Do you have any general comments on presentation and clarity (other than the content of the Plan)?*

N/A
-----

*Were you provided with the information you needed to respond to the document?  
How could this be improved?*

N/A
-----

## Section 2:

### **Representations on the Development Policies Plan's soundness and legal compliance**

***The purpose of this stage is for you to make formal representations on whether the Plan meets national tests of compliance. Representations you make here will be considered, including at Examination in Public hearings, by the Planning Inspectorate.***

If you are potentially unclear, or would like further information, please email [ldf@dartford.gov.uk](mailto:ldf@dartford.gov.uk) or call 01322 843213.

[The National Planning Policy Framework details the tests of soundness at Paragraph 182 (page 43): [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)]

1. *To which part of the Development Policies Plan Document does this representation relate? Please specify the Policy or Paragraph number.*

Paragraph 2.5, page 8

LRCH support the recognition of the LPER as a NSIP within paragraph 2.5. Notwithstanding this observation, given the national significance of the project, we feel the document could go further in emphasising the economic, social and environmental benefits of the project, including:

- A catalyst for regeneration in the area including the delivery of the Ebbsfleet Garden City;
- Regeneration of a largely a brownfield site
- Multi-billion pound investment and benefits to local economies;
- Increased economic activity in the local area, leading to an associated increase in local spend;
- Over 20,000 employment opportunities;
- Up to 6,000 construction jobs;
- Becoming a centre for British innovation and creative businesses to grow;
- Improvements to the roads, ensuring that new infrastructure is in place; and
- A green network to include areas of environmental enhancement and wildlife habitat creation beside the River Thames.

LPER would welcome the opportunity to liaise with the Council on this matter.

2. *Do you consider the Plan to be legally compliant?  
[please circle or highlight]*

**Yes**

**No**



3. Do you consider the Plan to be 'sound'?

*[please circle or highlight]*

a)

**Yes**

**No**

b) **If 'No':** do you consider the Plan to be unsound because it is:

i. **Not Positively Prepared**

ii. **Not Justified**

iii. **Not Effective**

iv. **Not Consistent with National Policy**

4. Please use this box below to specify the reasons for your answers to questions 2&3. Please be as precise as possible.

N/A

5. **If you answered 'No' to questions 2 or 3a above** on legal compliance/ soundness, please set out in the box below specific change(s) you consider necessary to make the Development Policies Plan legal/ sound. (For soundness matters, you should refer to the particular issue of soundness you selected in question 3b. For legal

*compliance, if you are considering matters of the Duty to Cooperate, please note that changes cannot be made through modifications on this at examination stage).*

*You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or supporting text.*

N/A

### **Section 3: Final Representation Matters**

6. *Would you like to be notified of the following:  
[please circle or highlight]*



- i. *The submission of the Development Policies Plan Document for independent examination by the Secretary of State?*

**Yes**

**No**

- ii. *The publication of the Inspector's recommendations following the examination?*

**Yes**

**No**

- iii. *The adoption of the Development Policies Plan Document if found sound?*

**Yes**

**No**

**Your signature:**

C Potts

**Date:**

04 / 03 / 2016

**Data Protection Statement:** The information you provide will be held and used by Dartford Borough Council, in accordance with the Data Protection Act 1998, to help in the preparation of the Development Management Plan Scoping Report. Please note that all responses received will be available for public inspection. Your personal details will however remain confidential.

**ALL RESPONSES MUST BE RECEIVED BY  
4pm Friday 4<sup>th</sup> March 2016**

The Council cannot guarantee full account will be taken of late representations. Please ensure your comments are received by us in time. If you are having difficulty responding, please contact us in advance and see how we can help you respond within the deadline.

Completed forms should be sent to the following address:  
Planning Policy Team  
Dartford Borough Council  
Civic Centre  
Home Gardens  
Dartford  
Kent, DA1 1DR

Email address: [LDF@dartford.gov.uk](mailto:LDF@dartford.gov.uk)

Further electronic copies of this form are available:

- On the Council's website via: [www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)
- By telephone (01322) 343213

If you or anybody you know requires this or any other council information in another language please contact us and we will do our best to provide this for you.

Braille, Audio tape and large print versions of this document are available upon request.

Tel: 01322 343434 / Fax: 01322 343432

Email: [customer.services@dartford.gov.uk](mailto:customer.services@dartford.gov.uk)

**REPRESENTATION FORM****Development Policies Plan**
**DARTFORD**  
 BOROUGH COUNCIL

For office use only

Reference No:

All respondents should complete Sections 1 to 3 of this form. You are requested to complete section 4 equalities monitoring form.

Further copies of this representation form are available via: [ldf@dartford.gov.uk](mailto:ldf@dartford.gov.uk)

**Section 1: Your Details and Consultation Procedures Feedback**

Name	Christopher Potts
Job Title (if relevant)	Director
Company/organisation name (if relevant)	Savills
Client's name (if applicable)	London Resort Company Holdings
Postal address	c/o Savills 15, Weymouth Road London SE13 6PL
Email address	christopher.potts@savills.com

Our Statement of Community Involvement says that we will keep consultation methods under review. We need your help with this please. You may also wish to give 'informal feedback'. Please indicate below how you became aware of the consultation.

Email

Do you consider that the document is easy to read? Do you have any general comments on presentation and clarity (other than the content of the Plan)?

N/A

Were you provided with the information you needed to respond to the document?  
How could this be improved?

N/A

## Section 2:

### **Representations on the Development Policies Plan's soundness and legal compliance**

*The purpose of this stage is for you to make formal representations on whether the Plan meets national tests of compliance. Representations you make here will be considered, including at Examination in Public hearings, by the Planning Inspectorate.*

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1. *To which part of the Development Policies Plan Document does this representation relate? Please specify the Policy or Paragraph number.*

#### Proposals Map

Diagram 7: Thames Waterfront Priority Area of the Core Strategy recognises the Swanscombe Peninsula as a 'Key Development Site'. In the four years since the Core Strategy was adopted, the LPER project has taken notable steps forward towards a DCO application and can now be afforded sufficient weight that warrants recognition within the accompanying Proposals Map. It would therefore seem appropriate for the local planning authority to acknowledge the extent of the LPER DCO Order limit within its Proposals Map, as per the enclosed. An accompanying explanation could be provided within the document (or a new policy) to support this identification and. LPER would welcome the opportunity to liaise with the Council on this matter.

2. *Do you consider the Plan to be legally compliant?  
[please circle or highlight]*

**Yes**

**No**



3. Do you consider the Plan to be 'sound'?

*[please circle or highlight]*

a)

**Yes**

**No**

b) **If 'No':** do you consider the Plan to be unsound because it is:

i. **Not Positively Prepared**

ii. **Not Justified**

iii. **Not Effective**

iv. **Not Consistent with National Policy**

4. Please use this box below to specify the reasons for your answers to questions 2&3. Please be as precise as possible.

N/A

5. **If you answered 'No' to questions 2 or 3a above on legal compliance/ soundness,** please set out in the box below specific change(s) you consider necessary to make the Development Policies Plan legal/ sound. (For soundness matters, you should refer to the particular issue of soundness you selected in question 3b. For legal

*compliance, if you are considering matters of the Duty to Cooperate, please note that changes cannot be made through modifications on this at examination stage). You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or supporting text.*

N/A

### **Section 3: Final Representation Matters**

6. *Would you like to be notified of the following:  
[please circle or highlight]*

**ALL RESPONSES MUST BE RECEIVED BY  
4pm Friday 4<sup>th</sup> March 2016**

The Council cannot guarantee full account will be taken of late representations. Please ensure your comments are received by us in time. If you are having difficulty responding, please contact us in advance and see how we can help you respond within the deadline.

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Dartford Borough Council  
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Dartford  
Kent, DA1 1DR

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- i. *The submission of the Development Policies Plan Document for independent examination by the Secretary of State?*

**Yes**

**No**

- ii. *The publication of the Inspector's recommendations following the examination?*

**Yes**

**No**

- iii. *The adoption of the Development Policies Plan Document if found sound?*

**Yes**

**No**

**Your signature:**

C Potts

**Date:**

04 / 03 / 2016

**Data Protection Statement:** The information you provide will be held and used by Dartford Borough Council, in accordance with the Data Protection Act 1998, to help in the preparation of the Development Management Plan Scoping Report. Please note that all responses received will be available for public inspection. Your personal details will however remain confidential.



## **Appendix 2**

### **Dartford Strategic Issues Consultation (Regulation 18) (June 2018) – LRCH comments**

19 July 2018



**VIA EMAIL**  
**LDF@DARTFORD.GOV.UK**

Planning Policy Team  
Dartford Borough Council  
Civic Centre  
Home Gardens  
Dartford  
Kent  
DA1 1DR

Christopher Potts

Dear Sir/Madam,

**DARTFORD STRATEGIC ISSUES CONSULTATION (REGULATION 18) (JUNE 2018)**

**REPRESENTATIONS SUBMITTED ON BEHALF OF LONDON RESORT COMPANY HOLDINGS**

On behalf of our client, London Resort Company Holdings ("LRCH"), Savills is instructed to submit representations to current consultations on emerging planning policy documents within Dartford.

**London Resort**

As you will be aware, LRCH is progressing the London Resort, a recognised Nationally Significant Infrastructure Project ("NSIP"), on the Swanscombe Peninsula. The London Resort will be the UK's largest leisure project on over 500 hectares of land with a dedicated access road off the A2, producing substantial regeneration benefits to the local, regional and national economies and enabling the creation of over 20,000 employment opportunities.

LRCH is committed to delivering the project and to date have undertaken significant statutory and non-statutory consultation encompassing widespread engagement with consultees, the Planning Inspectorate and members of the public since 2014. LRCH's expert team of consultants continue to develop the project.

While the London Resort scheme is being progressed as a Development Consent Order ("DCO") application to the Planning Inspectorate, the project covers an area falling within the administrative boundaries of both Gravesham Borough Council and Dartford Borough Council. The project also falls within the administrative areas of Kent County Council and the Ebbsfleet Development Corporation. LRCH is therefore actively monitoring the planning policy context and all relevant publications across these organisations and providing consultation responses as appropriate. Specifically at this time, we comment on the Strategic Issues consultation.

LRCH's representations to these documents can be found collectively within this letter and the duly completed enclosed Strategic Issues Consultation Representation Form.

**Representations**

There are multiple direct and implied references throughout the document towards the London Resort in terms of economic benefits and infrastructure. LRCH supports the references to the London Resort within the document and the recognition of the extensive work already undertaken in progressing its proposals. LRCH also support the identification of the London Resort's potential benefits, including significant direct and indirect employment opportunities.

Notwithstanding this observation, given the national significance of the project, we feel the document could go further in emphasising the economic, social and environmental benefits of the project, including:

- A catalyst for regeneration in the area including the delivery of the Ebbsfleet Garden City;
- Regeneration of a largely brownfield site
- Multi-billion pound investment and benefits to local economies;
- Increased economic activity in the local area, leading to an associated increase in spend locally;
- Over 20,000 employment opportunities;
- Up to 6,000 construction jobs;
- Becoming a centre for British innovation and creative businesses to grow;
- Improvements to the roads, ensuring that new infrastructure is in place; and
- A green network to include areas of environmental enhancement and wildlife habitat creation beside the River Thames.

LRCH encourage policies which will enable the delivery of growth across the Swanscombe Peninsula, to which the London Resort is a fundamental part.

We trust the above and enclosed representations may be taken into consideration in the progression of planning policies documents throughout Dartford. Should you require any further information or clarification in respect of these comments, please do not hesitate to contact me.

Yours faithfully,

pp.

**Christopher Potts**  
Director

Enc. Strategic Issues Consultation Representation Form

## **REPRESENTATION FORM**

**DARTFORD**  
BOROUGH COUNCIL

### **Dartford New Local Plan Strategic Issues Consultation**



For office use only

Ref No:

Dartford Borough Council welcomes your comments on the [Strategic Issues Consultation](#). Please ensure that you complete section A and record your comments against the relevant questions in sections B-E as appropriate.

By providing your details to comment on this consultation – held under The Town and Country Planning (Local Planning) (England) Regulations 2012 – you are **consenting** to us legitimately retaining your contact details for the purposes of Dartford planning policy consultations. Under Regulation 19, we have duties to inform certain consultees again when the Local Plan reaches Publication stage.

You may exercise your right under the Data Protection Act 2018, and the Privacy and Electronic Communications (EC Directive) Regulations 2003, to unsubscribe from further communication from us by completing this [electronic form](#) or writing to us at the address below. Our Privacy Notice at [www.dartford.gov.uk](http://www.dartford.gov.uk) tells you what to expect when we collect personal information and who to contact if you have any concerns or questions about how we look after your personal information.

Local Plan representations cannot be kept confidential or be made anonymously, but contact details will not be published. All responses must be received by **5pm on Friday 20 July 2018**.

Completed forms should be emailed to: [LDF@dartford.gov.uk](mailto:LDF@dartford.gov.uk)

Alternatively, they can be sent to:

Planning Policy Team  
Dartford Borough Council  
Civic Centre  
Home Gardens  
Dartford  
Kent DA1 1DR

If you have any queries about this consultation, please contact the Planning Policy Team by emailing [LDF@dartford.gov.uk](mailto:LDF@dartford.gov.uk) or by phoning 01322 343213.

## **Section A: Your Details**

Name	Chris Potts
Job Title (if applicable)	Director
Company/organisation name (if applicable)	Savills
Client's name (if applicable)	London Resort Company Holdings Limited

## Dartford New Local Plan – Strategic Issues Consultation 2018

Postal address	
Email address	

## Section B: Dartford's Strategic Development Objectives and Issues

### NATIONAL POLICY AND SCOPE OF THE PLAN

1. What do you think of the current strategic objectives and future vision for Dartford?

- 2a. Should the next Dartford Local Plan be predominantly concerned with major strategic policies, or is it also necessary to prepare a further update of detailed development management policies?

- 2b. What do you think is the most important long-term topic for future strategic policies for the Borough?

- 2c. Is there a pressing need to deliver new local guidance on other policy areas? If so, what should this cover?

### STRATEGIC PLANNING, INFRASTRUCTURE AND THE DUTY TO COOPERATE

- 3a. What do you consider is the main cross boundary planning/infrastructure issue extending beyond the Borough for the Council to work on with other councils and public sector agencies?

- 3b. Do you support the aims in the Protocol for Action and Communication?

- 3c. What do you think are the main implications for the Dartford Local Plan, in the Borough and with cross boundary working, of the government's consultation on the approach to development contributions?

## Section C: Features of the Development Strategy for the Borough

### EXISTING STRATEGIC ISSUES

- 4a. Looking at issues identified in current policy, is there anything additional that needs to be tackled in the new Local Plan?

- 4b. Which issues are of less importance in terms of future strategic policies for the Borough?

5. Considering available evidence on homes, workplaces, retail and leisure, including the Core Strategy Policy Monitoring Review, what are the main respects in which the policy approach should be maintained or updated?

### HOMES

- 6a. What types of housing, including those now within the new draft National Planning Policy Framework, are particularly relevant to Dartford Borough, and why?

## Dartford New Local Plan – Strategic Issues Consultation 2018

- 6b. Are there circumstances/locations in Dartford that may provide a robust justification to continue to seek affordable housing contributions on private developments of ten units or less, despite government policy?

- 6c. Should Dartford's Local Plan expect all dwellings to be accessible/adaptable for all users and ages through national design standards? If so, what proportions should be set in referring to the Building Regulations that will apply?

- 7a. Do you think unplanned (windfall) housing in the Borough is problematic in the case of: i) small sized plots of land, and ii) larger plots of land?

- 7b. Does the windfall sites policy DP6 continue to have relevance for Dartford, or is it necessary for local policies for new housing on small sites (under half hectare/1.24 acres) to be relaxed to better reflect the direction of government policy?

### WORKPLACES

- 8a. What development is needed for the economic activities most important to Dartford's long-term economy and future quality of life?

- 8b. Can new economic growth in the Borough be primarily focussed on sectors that will deliver development and prosperity in locations that are, or will be in future, very well served by public transport?



- 8c. Should new economic growth be primarily focussed on sectors which match the local skills and experience of the resident workforce, so as to reduce the need for long travel to work journeys?

**RETAIL AND LEISURE (INCLUDING DARTFORD TOWN CENTRE)**

- 9a. With the progress in delivering a revival of Dartford town centre as set out in the Local Plan and the Town Centre Framework Supplementary Planning Document, what do you think are the main further strategic planning opportunities in the Town Centre?

- 9b. How can change be planned by the Dartford Local Plan in order for Bluewater to maintain an appropriate and sustainable role in the future as a Borough and regional centre for retail and/or leisure?

**TRANSPORT AND COMMUNITY INFRASTRUCTURE**

10. Considering available evidence on transport and community infrastructure, including the Infrastructure Delivery Plan and Core Strategy Policy Monitoring Review, what are the main respects in which the policy approach should be maintained or updated?

- 11a. In addition to the planned Strategic Transport Infrastructure Programme Schemes, should priority be given to improvement projects that tackle traffic congestion at the Dartford crossing, and would this focus assist with congestion and capacity issues on the Borough's roads?

- 11b. In addition to all these improvements, what do you think are the other highway measures which could improve the performance and free running of local roads in Dartford?

12. How can the Dartford Local Plan best promote and encourage use of sustainable transport, such as bus/Fastrack services and cycle facilities?

- 13a. What do you think are the three most important long-term issues facing future rail services in the Borough, and why:

- (i) journey times,
- (ii) peak capacity (overcrowding),
- (iii) punctuality/reliability,
- (iv) quality of rail stations in the Borough,
- (v) cost of travel, or
- (vi) maintaining access to existing London termini stations?

- 13b. Should there be investigation as to whether some train stations on the North Kent line can be rebuilt in a new slightly different location on the line (remaining within their local area) to provide improved facilities and access for all users, and closer proximity to major employers and the greatest concentrations of residents?

- 13c. Given the potential identified by Network Rail for a new train service linking London Victoria the north east of the Borough, via a link using the existing underused railway south of Ebbsfleet International, what would be the implications of exploring the route further and/or seeking private funding?

- 14a. To what extent will transport and community infrastructure planned in the Infrastructure Delivery Plan meet the range of needs arising from new development

in the Borough? Are there other types of infrastructure that will be required by development?

- 14b. Are there new funding mechanisms and approaches that the Council and infrastructure partners should explore to deliver the infrastructure needed in the Borough?

### **NATURAL ENVIRONMENT**

15. Considering available evidence on the natural environment, climate change, energy and air quality, and design and conservation, including the Core Strategy Policy Monitoring Review, what are the main respects in which the policy approach should be maintained or updated?

16. Do you think that Dartford's mitigation approach to the protection of international habitats and species on the North Kent coast will continue to be suitable for large developments in the east of the Borough helping mitigation and strategic greenspace provision in the area; and are there other approaches to achieving mitigation that should be considered?

### **CLIMATE CHANGE, ENERGY AND AIR QUALITY**

- 17a. How important to you are measures to reduce impact on climate change, and what do you think is the most relevant issue?

- 17b. How can local planning best support action to reduce harmful emissions at source, decrease reliance on diesel and petrol vehicles through providing alternative travel options, promote electric/hybrid vehicles, and deliver improved air quality in Dartford?

- 17c. What are the main future implications for the Local Plan of how new technology and alternative options can reduce the need to travel in environmentally impactful ways, minimise pollution or help save energy usage in buildings?

### **DESIGN AND CONSERVATION**

- 18a. How can the Local Plan better ensure local environmental, economic and community heritage is respected and reflected in future development?

- 18b. How should the need for a strategy for good design inform the preparation of the Local Plan and potential new redevelopment?

## **Section D: Main Areas and Types of Future Development**

### **PATTERN OF DEVELOPMENT**

19. Should the focus of development generally remain on the locations identified in the Core Strategy? Are there any other feasible major alternatives?

### **STONE, GREENHITHE, SWANSCOMBE AND THAMES RIVERSIDE**

20. How should strategy for the Ebbsfleet to Stone Priority Area be updated consistent with overall Borough objectives?

- 21a. What do you think should be the long-term future of former landfill sites in Stone and Greenhithe?

- 21b. Should the Local Plan explore the potential to capture public benefits or access on these sites?

- 21c. What are the implications for the identity of surrounding existing communities, and the sustainable development strategy for the Borough, if the landowner takes forward proposals on these sites?

22. How can the Local Plan best support regeneration within Swanscombe?

23. How should strategy for the Thames Waterfront Priority Area be updated consistent with overall Borough economic, transport and infrastructure objectives, and best reflecting its riverside characteristics?

#### **EBBSFLEET DEVELOPMENT CORPORATION AREA**

- 24a. What new planning policies are suitable and applicable for undeveloped land in the Ebbsfleet Development Corporation area in line with a modern, successful Garden City vision?

- 24b. What planning measures should be taken and tools used to ensure the sustainable development of the major development opportunity at Ebbsfleet Central (by the International Station)?

- 24c. What development and infrastructure should occur on other sites within the Ebbsfleet Development Corporation area if existing proposals/planning permissions do not materialise on them?

### **BROWNFIELD LAND AND FUTURE RESIDENTIAL POTENTIAL**

- 25a. What is the best way in Dartford Borough to make efficient use of land in line with government priorities?

- 25b. Should a target of 80% of housing to be on brownfield land be confirmed as a central part of Local Plan policy?

- 25c. Should the focus be on delivering sites currently in Part 1 of Dartford's Brownfield Register; if selected sites are also included in Part 2 of the Register (granting permission in principle for suitable development), where is most important?

### **ENHANCING OPEN SPACE PROVISION**

- 26a. Where do you think should be the focus of greenspace and outdoor recreation improvements, why is this the case and what type of provision is necessary?

26b. How would the local open space enhancement be funded/delivered and managed?

26c. What is the most important feature of new open space provision at small and large new residential development?

### **MAINTAINING GREEN BELT LAND**

27a. What are the implications of the draft NPPF Green Belt amendments for Dartford's Local Plan?

27b. Are there any individual properties/small parcels of brownfield land, or minor strips of land lying outside readily recognisable physical boundaries, where the Green Belt boundary may be unclear or not based on a permanent feature, or the land does not meet the formal purposes of Green Belt?

### **LOCAL PRIORITIES**

28a. What are the strategic development needs of each of these areas and why; what new uses can be delivered and how would they sufficiently contribute to providing for infrastructure needs?

28b. Are there any small or brownfield sites in these local areas suitable for jobs, leisure, community or other development?

- 28c. How and where should specialist residential needs or alternative sources of housing be appropriately encouraged locally e.g. sheltered care/accommodation for the elderly or disabled, local rural exceptions homes, build to rent development or custom/self-build housing?

## Section E: Other Comments

Do you have any other comments on the Strategic Issues or on the Supporting Information produced for this consultation (including the Core Strategy Review: Policy Monitoring and Five Year Deliverable Housing Land Supply 2018 reports)?

There are multiple direct and implied references throughout the document towards the London Resort in terms of economic benefits and infrastructure. LRCH supports the references to the London Resort within the document and the recognition of the extensive work already undertaken in progressing its proposals. LRCH also support the identification of the London Resort's potential benefits, including significant direct and indirect employment opportunities.

Notwithstanding this observation, given the national significance of the project, we feel the document could go further in emphasising the economic, social and environmental benefits of the project, including:

- A catalyst for regeneration in the area including the delivery of the Ebbsfleet Garden City;
- Regeneration of a largely brownfield site
- Multi-billion pound investment and benefits to local economies;
- Increased economic activity in the local area, leading to an associated increase in spend locally;
- Over 20,000 employment opportunities;
- Up to 6,000 construction jobs;
- Becoming a centre for British innovation and creative businesses to grow;
- Improvements to the roads, ensuring that new infrastructure is in place; and
- A green network to include areas of environmental enhancement and wildlife habitat creation beside the River Thames.

LRCH encourage policies which will enable the delivery of growth across the Swanscombe Peninsula, to which the London Resort is a fundamental part.

Your Signature:	pp.	Date:	19/07/2018
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If you or anybody you know requires this or any other Council information in another language, please contact us and we will do our best to provide this for you.



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Email: [customer.services@dartford.gov.uk](mailto:customer.services@dartford.gov.uk)

### **Appendix 3**

#### **Dartford Preferred Options Consultation (January 2020) – LRCH comments**

20 February 2020



**VIA EMAIL**  
**localplan@dartford.gov.uk**

Chris Potts

Planning Policy Team  
Dartford Borough Council  
Civic Centre  
Home Gardens  
Dartford  
Kent  
DA1 1DR

Dear Sir/Madam,

## **DARTFORD LOCAL PLAN – PREFERRED OPTIONS CONSULTATION 2020**

### **LONDON RESORT – SWANSCOMBE PENINSULA**

On behalf of our client, the London Resort Holdings Company (LRCH), Savills is instructed to provide comments in respect of the Dartford Local Plan (DLP) – Preferred Options Consultation 2020 being undertaken by the Dartford Borough Council (DBC).

LRCH comments are made in light of its proposals for a world class destination entertainment resort on the Swanscombe Peninsula. The site boundary is attached, which also includes land within the administrative area of Gravesham. The entire site is within the Ebbsfleet Development Corporation boundary.

### **The Site**

The overall site including the access corridor to the A2, totalling approximately 535 hectares, is principally based on the Swanscombe Peninsula on land to the east of Ingress Park north of Ebbsfleet International Station, between the A226 and the River Thames.

### **The Proposal**

The London Resort is a Nationally Significant Infrastructure Project (NSIP) and is being progressed through the Development Consent Order regime under the Planning Act 2008.

The London Resort is a unique project in the UK, with no comparable leisure and entertainment facility. The Resort represents a private sector investment of over £3bn to deliver a scheme comprising:

- Theme Park with global IP partners including Paramount Studios and the BBC
- Theatre, events space, themed retailing, dining
- 3500 hotel rooms, including water park
- Esports
- Tech-con
- Conference centre
- Operational housing
- Car parking spaces
- Reuse of ferry pier
- Dedicated Access Road from A2 Ebbsfleet to Peninsula
- An arrival plaza at Ebbsfleet International
- Thames-side pedestrian and cycle routes

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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Registered office: 33 Margaret Street, London, W1G 0JD



## **Regeneration**

This is a truly transformational regeneration of a brownfield former industrial site which requires considerable remediation.

The London Resort will create 10,000 multi-skilled employment opportunities directly and a further 10,000 – 15,000 indirectly, alongside an estimated 6,000 Construction jobs. The range of jobs will embrace many sectors of high-tech, engineering, transport and hospitality. The career opportunities to progress in a dynamic organisation are significant.

The London Resort will be delivered in 2 phases. The first phase comprises all the infrastructure, two-thirds of the theme park (known as Gate 1), and the associated retail, hotels and dining areas. The remainder of the theme park (known as Gate 2) will be delivered 5 years later.

The London Resort will attract in the region of 5 million annual visitors from opening year which will increase to 8 million annual visitors when fully developed, which will then continue to rise when the scheme reaches maturity.

The evidence of major global parks, such as Disneyland Paris, highlight the enormous economic dividend to the surrounding area.

## **Pre-Application Phase**

A recognition of the significant opportunities has been conveyed through the four stages of public consultation undertaken to date.

LRCH will undertake a further round of statutory consultation ahead of submission of the Development Consent Order application later in 2020.

Following a period of business plan review in 2019, LRCH “relaunched” the London Resort revealing new images of the emerging scheme. LRCH is committed to engaging with key stakeholders, using workshops to discuss key topics around masterplanning, transport and the environment.

## **Local Plan Comments**

The DBC consultation is being undertaken on the Dartford Local Plan – Preferred Options Consultation 2020 document. The LRCH seek to re-enforce the following points:

- As the Local Plan evolves a more robust reference to regeneration of the Swanscombe Peninsula and the London Resort development would assist in supporting the proposals and associated benefits which would transform the area and thus provide significant economic dividend.
- It is considered that the policies as drafted would benefit from being updated, as detailed in the attached consultation response form. Further consideration of the London Resort development within the policies would provide a better context for this development to come forward, particularly in light on the project benefits:
- As the Local Plan evolves, it is highly likely that a specific policy will be necessary to reflect the London Resort, which will be at examination during 2021 and has an anticipated decision date of early 2022

- In particular, '*main plan option 5*' should elaborate and establish the framework for facilitating the benefits of the proposed development. At this stage of the local plan development, it should be a priority to ensure sufficient flexibility for development of the Swanscombe Peninsula to allow for a world class transformational project such as The London Resort and its associated commercial uses.
- The London Resort is a significant opportunity and would be instrumental to meet strategic environmental objectives (SO7 and SO8), economic objectives by way of the creation of new jobs closer to home (SO2) and particularly the development of leisure facilities (SO9).

The other options in the Local Plan for the Swanscombe Peninsula will fail to realise the opportunity for this substantial waterside site which requires considerable investment to make development viable.

### **Environmental Appraisal**

The evidence supporting the London resort will address the environmental matters identified in the Sustainability Appraisal.

1. Housing – the Resort scheme will include 500 dwellings as operational housing. This provides a contribution to the Borough's housing provision.
2. Services & Facilities – the evidence from global parks elsewhere reveal the powerful link between the Resort and the local area – businesses, residents, community groups and so on. The scheme will have a significant positive effect.
3. Community Cohesion – the appraisal conclusions are completely wrong. The scheme is masterplanned to provide connections for the community, services and employment for local people, improved transport connections for local people – it will have a significant positive effect.
4. Health & Inequalities – employment opportunities for local people able to access the site conveniently, enjoy the revitalised habitats, new walking & cycling routes, access to better transport and enjoy the significant local expenditure from the scheme. Issues around noise and air quality will be addressed through the assessment and process and mitigation identified.
5. Economy – the scale of economic dividend experienced by comparable facilities will assist in demonstrating effects for the local area, alongside the bespoke assessment work.
6. Sustainable Travel – the transport strategy for the Resort will outline the multi-modal travel proposals
7. Mineral Resources – detailed information on the status of the mineral provision on site will be provided.
8. Soils – the remediation of contaminated land is a considerable benefit and the opportunity to invest in ways to enhance some of the existing marshes is significant.
9. Water Quality – detailed information about the water courses and their condition will be provided.
10. Air Pollution – detailed information on the effects based on the travel strategy will be provided.
11. Flood Risk – the Resort will demonstrate the measured being adopted to reflect the flood risk.
12. Climate Change – the Resort aims to operate to high standards of sustainability across its use of energy, approach to waste, modal split of visitors, integrated design and operational initiatives.
13. Biodiversity – the opportunity to enhance the marshes and provide significant biodiversity opportunities within the Resort will be shown through the emerging masterplan.

14. Historic Environment – the Resort is embracing the Peninsula’s unique heritage and will work with Historic England and Kent CC Heritage on a sustainable strategy to showcase the area’s history.
15. Landscape – the landscaping around and within the Resort will represent a very significant part of the scheme’s “feel” and will represent an enhancement on the existing situation.

## **Conclusion**

The London Resort is a nationally significant infrastructure project proposing a transformational global scale entertainment resort. The project has relaunched with world class partners, and recommenced a masterplanning exercise and technical assessments to be shared with Dartford BC. The scheme offers considerable social, economic and environmental benefits. Evidence will be provided to Dartford BC to support the identification of the Peninsula for the Resort.

LRCH reserves its position to amend, review and comment further in respect of these, and other, matters in future consultation stages.

Should you require any further information or clarification then please do not hesitate to contact me.

Yours faithfully,

pp.

**Chris Potts**  
Director

Enc.

# Dartford Local Plan – Preferred Options Consultation 2020

## RESPONSE FORM

For office use only

Ref No:



Dartford Borough Council welcomes your comments on the Local Plan Preferred Options Consultation. Please ensure that you complete the Your Details section below and record your comments in the Your Response section overpage.

By providing your details to comment on this consultation – held under The Town and Country Planning (Local Planning) (England) Regulations 2012 – you are **consenting** to us legitimately retaining your contact details for the purposes of Dartford planning policy consultations. Under Regulation 19, we have duties to inform certain consultees again when the Local Plan reaches Publication stage.

You may exercise your right under the Data Protection Act 2018, and the Privacy and Electronic Communications (EC Directive) Regulations 2003 to unsubscribe from further communication from us by completing this [electronic form](#) or writing to us at the address below. The Planning Policy Privacy Notice at <https://www.dartford.gov.uk/privacy-statement> tells you what to expect when we collect personal information and who to contact if you have any concerns or questions about how we look after your personal information.

Local Plan representations cannot be kept confidential or be made anonymously, but contact details will not be published. All responses must be received by **midday on Friday 21 February 2020**.

Completed forms should be emailed to: [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk) or sent to: Planning Policy Team, Dartford Borough Council, Civic Centre, Home Gardens, Dartford, Kent DA1 1DR

If you have any queries about this consultation, please contact the Planning Policy Team by emailing [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk) or by phoning 01322 343213.

### Your Details

Name	Chris Potts
Job Title (if applicable)	Director
Company/organisation name (if applicable)	Savills
Client's name (if applicable)	London Resort Company Holdings
Postal address	
Email address	
Date	20 <sup>th</sup> February 2020

## RESPONSE FORM

For office use only

Ref No:

### Your Response

**Question 1 – Do you support the proposed Vision and Strategic Objectives? If not, how do they need refining and why?**

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

London Resort Holding Company (LRCH) comments are made in light of its proposals for the London Resort development, a world class destination theme park on the Swanscombe Peninsula. Please see the covering letter.

LRCH comments are made in light of its proposals for a world class destination entertainment resort on the Swanscombe Peninsula. The site boundary is attached, which also includes land within the administrative area of Gravesham. The entire site is within the Ebbsfleet Development Corporation boundary.

The London Resort is a Nationally Significant Infrastructure Project (NSIP) and is being progressed through the Development Consent Order regime under the Planning Act 2008.

The London Resort is a unique project in the UK, with no comparable leisure and entertainment facility. The Resort represents a private sector investment of £3bn to deliver a scheme comprising:

- Theme Park with global IP partners including Paramount Studios and the BBC
- Theatre, events space, themed retailing, dining
- 3500 hotel rooms, including water park
- Esports
- Tech-con
- Conference centre
- Operational housing
- Car parking spaces
- Reuse of ferry pier
- Dedicated Access Road from A2 Ebbsfleet to Peninsula
- An arrival plaza at Ebbsfleet International
- Thames-side pedestrian and cycle routes

This is a truly transformational regeneration of a brownfield former industrial site which requires considerable remediation.

The London Resort will create 10,000 multi-skilled employment opportunities directly and a further 10,000 – 15,000 indirectly. The range of jobs will embrace many sectors of high-tech, engineering, transport and hospitality. The career opportunities to progress in a dynamic organisation are significant.



## Dartford Local Plan – Preferred Options Consultation 2020

The London Resort will be delivered in 2 phases. The first phase comprises all the infrastructure, two-thirds of the theme park (known as Gate 1), and the associated retail, hotels and dining areas. The remainder of the theme park (known as Gate 2) will be delivered after 5 years.

### Question 2 – For Main Plan Options 1, which option do you prefer, and why?

Option 1A	<input type="checkbox"/>	Option 1B	<input checked="" type="checkbox"/>	Option 1C	<input type="checkbox"/>
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Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

LRHC preferred option for the 'Main Plan Options 1' is "Option 1B – the Preferred Option". LRHC support the intention to maximise development of brownfield land. However, it is considered to maximise the contribution to the Strategic Objectives, regeneration supported by an anchor socio-economic development such as the London Resort should be integrated to the narrative of the policy.

### Question 3 – For Main Plan Options 2, which option do you prefer, and why?

Option 2A	<input type="checkbox"/>	Option 2B	<input type="checkbox"/>	Option 2C	<input type="checkbox"/>
-----------	--------------------------	-----------	--------------------------	-----------	--------------------------

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

No comment.

### Question 4 – For Main Plan Options 3, which option do you prefer, and why?

Option 3A	<input type="checkbox"/>	Option 3B	<input type="checkbox"/>	Option 3C	<input type="checkbox"/>
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Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

No Comment.

### Question 5 – For Main Plan Options 4, which option do you prefer, and why?

Option 4A	<input type="checkbox"/>	Option 4B	<input type="checkbox"/>	Option 4C	<input type="checkbox"/>
-----------	--------------------------	-----------	--------------------------	-----------	--------------------------

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

No Comment.

### Question 6 – For Main Plan Options 5, which option do you prefer, and why?

## Dartford Local Plan – Preferred Options Consultation 2020

Option 5A	<input checked="" type="checkbox"/>	Option 5B	<input type="checkbox"/>	Option 5C	<input type="checkbox"/>
-----------	-------------------------------------	-----------	--------------------------	-----------	--------------------------

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

The development of The London Resort would aid the delivery of the Vision and Strategic Objectives ( SO2, SO3, SO7, SO9) with the provision of:

The London Resort is a Nationally Significant Infrastructure Project (NSIP) and is being progressed through the Development Consent Order regime under the Planning Act 2008.

The London Resort is a unique project in the UK, with no comparable leisure and entertainment facility. The Resort represents a private sector investment of £3bn to deliver a scheme comprising:

- Theme Park with global IP partners including Paramount Studios and the BBC
- Theatre, events space, themed retailing, dining
- 3500 hotel rooms, including water park
- Esports
- Tech-con
- Conference centre
- Operational housing
- Car parking spaces
- Reuse of ferry pier
- Dedicated Access Road from A2 Ebbsfleet to Peninsula
- An arrival plaza at Ebbsfleet International
- Thames-side pedestrian and cycle routes

This is a truly transformational regeneration of a brownfield former industrial site which requires considerable remediation.

The London Resort will create 10,000 multi-skilled employment opportunities directly and a further 10,000 – 15,000 indirectly. The range of jobs will embrace many sectors of high-tech, engineering, transport and hospitality. The career opportunities to progress in a dynamic organisation are significant.

The London Resort will be delivered in 2 phases. The first phase comprises all the infrastructure, two-thirds of the theme park (known as Gate 1), and the associated retail, hotels and dining areas. The remainder of the theme park (known as Gate 2) will be delivered after 5 years.

### Question 7 – For Main Plan Options 6, which option do you prefer, and why?

Option 6A	<input type="checkbox"/>	Option 6B	<input type="checkbox"/>	Option 6C	<input type="checkbox"/>
-----------	--------------------------	-----------	--------------------------	-----------	--------------------------

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

No comment.

### Question 8 - Do you support the approach of:

- focusing development on the two Priority Regeneration Centres of Dartford Town Centre and Ebbsfleet Garden City

## Dartford Local Plan – Preferred Options Consultation 2020

- some brownfield development at sustainable locations in the rest of the urban area (where very well served by public transport) especially for community uses
- small scale brownfield development in the villages
- no strategic release of Green Belt land?

If not, what are the reasonable alternative options for the distribution of development and what evidence do you have to support this?

Support		Conditionally Support	x	Object	
---------	--	-----------------------	---	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

The Swanscombe Peninsula is a vital regeneration area, within Ebbsfleet Garden City. The key diagram (A10) illustrates that the Swanscombe Peninsula is a priority area for regeneration. However, the accompanying text does not describe this clearly. Therefore, a more detailed description of regeneration of the Swanscombe Peninsula detailing the London Resort within this policy would be supported.

**Question 9 - Is the approach of planning for the provision of 797-865 homes per year appropriate or should an alternative upper figure be used? What evidence do you have to support the use of an alternative upper figure?**

797-865 homes		Alternative upper figure	
---------------	--	--------------------------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

No comment.

**Question 10 - Should any other major sites/broad location options (in addition to Ebbsfleet Central and Dartford Town) be shown as suitable for mixed use development? If so, why?**

Yes		No	
-----	--	----	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

Detailed identification is required that regeneration of the Swanscombe Peninsula for employment and mixed use development as a priority area as per the diagram at A10. Regeneration of the Swanscombe Peninsula and opportunities such as the London Resort should be outlined as suitable development in support of the strategic objectives.

**Question 11 - What are your views on the preferred approach to unplanned windfall housing proposals and why?**

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

## Dartford Local Plan – Preferred Options Consultation 2020

Please provide an explanation for your response in the box below.

No comment.
-------------

**Question 12 - Do you have any comments on Dartford's continued involvement in exploring the potential of the Crossrail (Elizabeth Line) extension to the Borough, and what this may mean for broadening the public transport options and supporting further regeneration in the Borough?**

Support		Conditionally Support	x	Object	
---------	--	-----------------------	---	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

Consideration of the regeneration of the Swanscombe Peninsula and The London Resort could support the business case for supporting further regeneration in the Borough.
---

**Question 13 - What infrastructure (in addition to that set out in the current Infrastructure Delivery Plan) is necessary to support the delivery of development in the new Local Plan and how can land needed for this be secured? What evidence do you have to support this?**

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

The London Resort Proposals on road capacity improvements would bring wider benefits including a new dedicated access route from the A2 and active travel options. There will be renewed ferry access options, pedestrian and cycle routes between the Resort and surrounding areas.
--

**Question 14 - Do you support the preferred policy approach and key development sites for Dartford Town Priority Regeneration Centre? If not, what are the reasonable alternative options and what evidence do you have to support this?**

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

No comment.
-------------

**Question 15 - Do you support the preferred approach for retail and commercial leisure development, including for Bluewater and Dartford Town Centre? If not, what are the reasonable alternative options and what evidence do you have to support this?**

Support		Conditionally Support		Object	x
---------	--	-----------------------	--	--------	---

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

## Dartford Local Plan – Preferred Options Consultation 2020

Regeneration of the Swanscombe Peninsula and once in a generation opportunities such as the London Resort world class visitor attraction should be enabled to integrate relevant/ associated retail and commercial uses. The Resort will complement the existing high streets and create significant benefits through spin off investment and expenditure.

### RESPONSES ON EBBSFLEET GARDEN CITY SECTION (CHAPTER 5, SECTION E)

15A [No specific question included in the published consultation document]

Support (section E)		Conditionally Support (section E)	x	Object (section E)	
------------------------	--	---	---	-----------------------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

--

**Question 16 - Do you support the preferred approach to business premises and employment sites in the Borough, including the proposed strategic employment allocation and criteria for development at the former Littlebrook Power Station? If not, what are the reasonable alternative options at Littlebrook and elsewhere, and what evidence do you have to support this?**

Support		Conditionally Support		Object	
---------	--	--------------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

No comment.
-------------

**Question 17 - Do you support the preferred approach to protecting, enhancing and providing new public open spaces, the provision of private space, biodiversity and landscape? If not, what changes should be made and why?**

Support		Conditionally Support	x	Object	
---------	--	--------------------------	---	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

LRCH would propose the addition of a reference to the opportunities for enhancement that are provided by strategic regeneration projects such as the London Resort.
---

## Dartford Local Plan – Preferred Options Consultation 2020

**Question 18 - Do you support the preferred approach to renewable energy, water conservation and flood risk? If not, what alternative approach should be adopted and what evidence do you have to support this?**

Support		Conditionally Support	x	Object	
---------	--	-----------------------	---	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

<p>LRCH have partnered with EDF Energy and aim to make the London Resort an exemplar addressing energy use and commitments which will include onsite low carbon and renewable sources.</p> <p>In light of the above, LRCH support the approach and would propose the addition of a reference to the opportunities for enhancement that are provided by strategic regeneration projects such as the London Resort.</p>
---

**Question 19 - Do you support the preferred approach for thresholds, percentages and tenures of affordable housing provision? If not, please set out an alternative option and explain your reasons.**

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

No comment.
-------------

**Question 20 - Do you support the preferred approach to accessible/adaptable and wheelchair user homes and minimum space standards in Dartford? If not, what reasonable alternative option should be adopted and what evidence do you have to support this?**

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

No comment.
-------------

**Question 21 - Do you support Dartford's preferred approach to the mix of development on sites? If not, what alternative option should be adopted and what evidence do you have to support this?**

## Dartford Local Plan – Preferred Options Consultation 2020

Support		Conditionally Support		Object	x
---------	--	-----------------------	--	--------	---

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

Within the proposals, the development mix relates only to housing (residential density). Consideration should be given to a commercial mix of development to facilitate the regeneration of the Swanscombe Peninsula. Flexibility is required in this regard to facilitate a world class visitor attraction in the London Resort.

### Question 22 - What do you think Dartford's preferred approach should be to the density of development on sites and what evidence do you have to support this?

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

No comment.

### Question 23 - In terms of gypsies, travellers and travelling show-people:

- Do you support the preferred approach towards identifying deliverable sites to meet needs over the next 5 years? If not, please set out an alternative way that this could be carried out.
- What are your views on the potential sources of sites? Are there any alternative sources or specific sites that we should consider as an option?
- Do you have any views on the proposed changes to the existing criteria based policy?

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

No comment.

### Question 24 - Do any of these current policies need significant updating? If so, how and why should they be updated?

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

It is considered that the policies as drafted would benefit from being updated.

In particular, '*main plan option 5*' should elaborate and establish the framework for facilitating the benefits of the London Resort.

At this stage of the local plan development, it should be a priority to ensure sufficient flexibility for development of the Swanscombe Peninsula to allow for a world class transformational project such as the London Resort and its associated commercial and retail uses.

## **Dartford Local Plan – Preferred Options Consultation 2020**

The London Resort is a significant opportunity and would be instrumental to meet strategic environmental objectives (SO7 and SO8), economic objectives by way of the creation of new jobs closer to home (SO2) and particularly the development of leisure facilities (SO9).



#### **Appendix 4**

**Dartford Pre-Submission Dartford Local Plan to 2037 (Publication) Document (February 2021) – LRCH comments**

9 April 2021



C

Mark Aplin  
Planning Policy Manager  
Dartford Borough Council  
Civic Centre  
Home Gardens  
Dartford  
Kent  
DA1 1DR

[www.savills.co.uk](http://www.savills.co.uk)

Dear Mr Aplin,

**PRE-SUBMISSION DARTFORD LOCAL PLAN TO 2037 (PUBLICATION) DOCUMENT (FEBRUARY 2021)  
CONSULTATION**

**REPRESENTATIONS SUBMITTED ON BEHALF OF LONDON RESORT COMPANY HOLDINGS LIMITED**

Savills is instructed on behalf of London Resort Company Holdings Limited ("LRCH") to submit representations on the consultation to the Pre-Submission Dartford Local Plan to 2037 (Publication) Document (February 2021) ("PSDLP").

The comments are structured so as to first identify the background, significance and scale of the London Resort as a global entertainment resort (**Part 1**). Overarching comments on the PSDLP's strategy and approach are then provided (**Part 2**) followed by detailed comments on a large number of specific aspects of the PSDLP and corresponding modifications required for the document to be found sound (**Part 3** and **Appendix 5**). The comments end with conclusions and recommendations (**Part 4**). As agreed, one Representation Form has also been enclosed.

Overall, the comments provided on behalf of LRCH raise significant concerns with the strategy and approach being pursued by the PSDLP and a failure to fully recognise, plan-for and harness the potential of the London Resort. This failure to plan for the London Resort is all the more surprising given that Dartford Borough Council's ("DBC") Cabinet supports this transformational regeneration of a contaminated site, with the provision of a world-class global scale entertainment resort.

LRCH would welcome the opportunity to engage with DBC in a positive and constructive manner on how the PSDLP can be recast to reflect on the significant opportunities presented by the London Resort.

**PART 1: BACKGROUND TO THE LONDON RESORT**

LRCH is progressing the London Resort on the Swanscombe Peninsula which is formally designated as a Nationally Significant Infrastructure Project ("NSIP") by the Secretary of State for Housing, Communities and Local Government. The London Resort will be a world class global entertainment resort set in over 400 hectares of land and will facilitate the regeneration of significant areas of previously developed (brownfield and contaminated) land, much of which falls within the administrative boundary of DBC, representing in excess of £2.5 billion investment that will generate significant economic and employment opportunities both during construction and operationally in the decades to come. The London Resort will also enhance and protect wildlife and amenity areas of the various marshes as part of a comprehensive biodiversity strategy.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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LRCH is committed to engagement on all aspects of its proposals and has undertaken five stages of statutory and non-statutory consultation encompassing widespread engagement with statutory consultees, stakeholders and members of the public. The most recent, stage five, consultation ran from July-September 2020. LRCH therefore has a considerable database of stakeholders and feedback on the scheme and issues to be addressed.

LRCH submitted its Development Consent Order (“DCO”) application to the Secretary of State, via the Planning Inspectorate (“PINS”) on 31 December 2020 and was formally accepted by PINS for examination on 28 January 2021. Subject to receiving development consent (with a decision expected by summer 2022), it is LRCH’s intention to commence development immediately to be in a position to open the London Resort, including the Gate One theme park, in 2024 followed by Gate Two in 2029. Annual visitors are expected to reach 6.5m in 2025, 8.5m in 2029 and 12.5m at maturity in 2039.

In this regard it is worth reiterating the substantial economic benefits expected to arise from the London Resort and the unique opportunity for DBC to benefit from and capture the benefits for communities and businesses for decades to come. LRCH’s commitment to delivery upon receiving development consent which should be material in the decision-making process on which option(s) to pursue. For example, the London Resort will:

- Represent an investment of over £2.5 billion;
- Attract 12.5m visitors a year at maturity;
- Generate up to £70m spending by domestic and international tourists visiting the London Resort in the local area per annum at maturity, including spending on hotels, restaurants, travel alongside other spending in the local area; and
- Provide for a significant number of direct employment opportunities, with an estimated 17,310 workers (11,215 FTEs) at maturity upskilling the local workforce and adding to the local, regional and national economy. Support up to 48,000 direct, indirect and induced jobs by 2038, creating knock on benefits to the economy. The London Resort has an Employment & Skills Strategy created alongside the local authorities, education providers and training organisations to ensure the residents of Dartford and its communities have significant opportunities.

The DCO Order Limits covers an area falling within the administrative boundaries of DBC, Gravesham Borough Council (“GBC”) and Thurrock Council (“TC”). The project also falls within the administrative areas of Kent County Council (“KCC”) and the Ebbsfleet Development Corporation (“EDC”). LRCH therefore actively monitors all relevant publications and consultations across these organisations and geographical area, providing consultation responses as appropriate to ensure the comprehensive and joined up delivery of the London Resort.

## **PART 2: OVERARCHING COMMENTS**

The Dartford Local Plan (“DLP”) aims to replace the existing Dartford Core Strategy (September 2011) and the Dartford Development Policies Plan (July 2017) and form the statutory development plan for use in decision-making across the Borough in accordance with Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004. Any replacement will be contingent upon the DLP being suitable for scrutiny and consideration against current circumstances and future potential and ambition.

LRCH’s DCO application is to be assessed and determined in accordance with the Planning Act 2008. However, LRCH is mindful that an up to date development plan can provide valuable information on local planning, land use and environmental considerations that may assist in the Examining Authority’s assessment and recommendation of the application and, ultimately, the determination of the DCO by the Secretary of State should he see such as relevant and important to his decision, in accordance with Section 105 of the Planning Act 2008.

For this reason, on behalf of LRCH, Savills has previously engaged with DBC in the preparation of development plan documents within the Borough, identifying and repeating in numerous consultation responses the strategic significance of the London Resort as a NSIP in terms of its transformational opportunity, economic dividend, social opportunities and environmental benefits. Consultation responses have been provided in respect of the:

- Dartford Development Policies (Pre-Submission) Consultation (December 2015) (see **Appendix 1**);
- Dartford Strategic Issues Consultation (Regulation 18) (June 2018) (see **Appendix 2**); and
- Dartford Preferred Options Consultation (January 2020) (see **Appendix 3**).

These earlier representations highlighted the proposals for the London Resort and noted its significance, scale and the range of positive impacts it would deliver. The earlier representations also signalled how the DLP should better plan for and support the delivery of the London Resort. It is disappointing that these representations have not been reflected in the PSDLP, especially given the extent of work being undertaken during 2020 in parallel on the PSDLP and submission of the London Resort.

Outside of these formal consultations, LRCH and its representatives have been engaged with the Leader of DBC and Senior Officers across various departments (both individually and jointly with Officers from EDC, GBC, KCC and to some extent TC) with regards to the London Resort, and indeed there has been repeated support for the scheme. This engagement intensified during 2017/18 and again more recently during 2020/21 as the London Resort reached a significant project milestone of the submission of its DCO application and subsequent Acceptance by PINS.

As such, DBC has been kept fully informed as to the emerging proposals for the London Resort, both through formal 'plan-making' consultations and engagement on development management matters.

In light of the above, LRCH is disappointed and concerned to learn of the somewhat distant and negative approach being taken in respect of the London Resort within the PSDLP. Regrettably, on this basis, we find the PSDLP fundamentally fails all four of the tests of soundness set out in Paragraph 35 of the National Planning Policy Framework (February 2019) ("NPPF") finding that it is neither positively prepared, justified, effective nor consistent with national policy. LRCH therefore has serious concerns with regards to its scrutiny during Examination in Public ("EiP").

While the London Resort is acknowledged and referenced within the PSDLP in a handful of places, these are presented as an 'after thought' with it evident the PSDLP has not been prepared in a way which embraces the significant economic, environmental and social opportunities presented by the London Resort. Rather, and disappointingly, the approach of the PSDLP appears to have been to leave the London Resort all but 'outside' with an indication the successful delivery of the London Resort will trigger a review of the DLP. In our view this does not reflect the requirements of Paragraph 16b) of the NPPF which requires development plan documents to *"be prepared positively, in a way that is aspirational but deliverable"*<sup>1</sup> and also fails to satisfy the four tests of soundness set out in Paragraph 35 referenced above.

As a result, LRCH strongly believe that in pursuing a strategy that fails to adequately take account of the London Resort the PSDLP is not fit for purpose and must be found unsound. LRCH is of the strong view that the opposite approach should be taken with the London Resort fully integrated into the strategy, objectives and finer detail of the DLP from the outset. LRCH consider that the NPPF places a clear requirement upon DBC to prepare and undertake its Local Plan review positively, with aspiration and with the presumption in favour of sustainable development. As currently drafted, the PSDLP does not achieve this.

It is regrettable that LRCH find itself in a position of strongly objecting to the PSDLP but in light of the comments above and the detailed comments that will follow in these representations (see **Appendix 5**), the importance of LRCH as a key stakeholder in the Borough and on the emergence of the DLP is well-founded. It goes without saying that LRCH's will look to engage further with the EiP should the PSDLP continue in its current trajectory.

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<sup>1</sup> We note this test remains unchanged in the recent consultation on changes to the NPPF as set out in the National Planning Policy Framework: Draft text for consultation (MHCLG, January 2021)

## Overlapping timescales

As noted previously, the London Resort DCO application was submitted to the Secretary of State for Housing, Communities and Local Government (via the Planning Inspectorate) on 31 December 2020 and subsequently 'Accepted' for examination on 28 January 2021. It is anticipated a decision on the London Resort DCO will be issued by summer 2022.

As the timescales of examination are prescribed under the Planning Act 2008, there is certainty with regards to when a decision can be expected on the London Resort DCO. While the same cannot be said for the examination of the PSDLP, indicative timescales are set out within the Local Development Scheme 2021. When comparing the timescales (see **Appendix 4**) it is clear there is a significant degree of overlap which is likely to cause procedural and technical difficulties in advancing the PSDLP to adoption should development consent be made for the London Resort.

It is possible that a decision on the London Resort will be made while the PSDLP is still in the final stages of examination which is likely to cause significant discomfort to the examination, possibly requiring the suspension of the examination for DBC to consider the implications upon the soundness of the PSDLP given its current omission.

Moreover, it is anticipated some enabling works to deliver the London Resort may progress outside of the DCO process, following permissions secured via the Town and Country Planning Act 1990. This will seek to ensure the effective delivery and start of construction on site as soon as possible should development consent be made. This planned approach is designed to enable an implementation of the DCO itself very soon after a decision is made, possibly meaning a material start to implementing the DCO on site before the DLP is even adopted. In such a scenario, it is considered the strategy and approach taken in the DLP would be woefully inadequate requiring an almost instantaneous review of the DLP such is the significance and materiality of the London Resort. This further reinforces LRCH's view that the PSDLP must progress in a manner that fully recognises and plans for the London Resort.

## PART 3: DETAILED COMMENTS

As you will be aware, the examination of Local Plans seeks to assess whether they have been prepared in accordance with legal and procedural requirements and can therefore be found 'sound'. Paragraph 35 of the NPPF identifies the four tests of soundness as:

- "a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework."*

Detailed comments on individual chapters, paragraphs, policies and policies map that LRCH believe are relevant to the London Resort are provided at **Appendix 5**. These comments identify the areas of concern and which soundness test are/are not met and why. Regrettably, LRCH believe the PSDLP fails to meet all four tests of soundness in that it has not been positively prepared, is not justified, is not effective and is not consistent with national policy.

## **PART 4: RECOMMENDATIONS AND CONCLUSION**

As identified within the comments above and the detailed comments provided at **Appendix 5**, there is a genuine and urgent need for DBC to reconsider the strategy taken within the PSDLP with regards to the negative recognition of the London Resort. The comments and concerns set out are sufficient that LRCH believe it warrants a suspension of the PSDLP and a requirement for the strategy, objectives and detailed approach to better align to the delivery of the London Resort.

Overall it is regrettable that DBC has taken the position to not engage with LRCH in its plan making process so that the PSDLP fails to recognise the significant *positive* impacts of the London Resort.

Should you require any further information, please do not hesitate to contact me.

Yours sincerely,

**Christopher Potts**  
Director  
Savills

Enc. As above

Cc. Andy Martin, LRCH  
Sonia Collins, DBC

## **Appendices**

<b>Appendix 1</b>	Dartford Development Policies (Pre-Submission) Consultation (December 2015) – LRCH comments
<b>Appendix 2</b>	Dartford Strategic Issues Consultation (Regulation 18) (June 2018) – LRCH comments
<b>Appendix 3</b>	Dartford Preferred Options Consultation (January 2020) – LRCH comments
<b>Appendix 4</b>	London Resort and Dartford Local Plan timescales
<b>Appendix 5</b>	Detailed comments
<b>Appendix 6</b>	Supporting evidence base

# Dartford Local Plan Pre- Submission (Publication) February 2020 Town and Country Planning (Local Planning) England Regulations 2012 – Regulation 19

## Representation Form

Representations on the Dartford Local Plan should be submitted by **4pm on Friday 9 April 2021**.  
**Late representations will not be accepted.**

Representations should be made using this form and submitted to Dartford Borough Council by email to [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk) or sent to: Planning Policy Team, Dartford Borough Council, Civic Centre, Home Gardens, Dartford, Kent DA1 1DR.

Additional copies of the form can be obtained from the Council's website at: <https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/new-local-plan>. Photocopies of blank forms can also be made.

Advice on how to make representations is provided in the guidance notes which accompany this form. You are strongly advised to read the guidance notes before completing this form.

This form comprises 3 parts:

- Part 1: Your details
- Part 2: Your representation(s). Please fill out a separate sheet for each representation you wish to make. However, only fill in Part A once and send all representations in together.
- Part 3: Declaration

If you have any queries about this consultation, please contact the Planning Policy Team by emailing [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk) or by phoning 01322 343213.

You only need to fill this section out once

## Part 1: Your details

You only need to fill this section out once

	1. Personal details	2. Agent details (if applicable)
Title	Mr	Mr
Name	Andy Martin	Chris Potts
Organisation / group	London Resort Company Holdings Limited	Savills (UK) Limited
Address 1	c/o Agent	
Address 2		
Address 3		
Postcode		
Telephone number		
Email address		

If you are replying on behalf of a group, how many people does it represent?

## Part 2: Representation

### For office use only

Consultee ID:

Agent ID:

Date Received: :

Please use a separate sheet for each representation

Name or Organisation:	London Resort Company Holdings Limited
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### 1. To which part of the Local Plan does this representation relate?

Paragraph

Various

Policy

Various

Policies Map

Various

### 2. Do you consider the Local Plan is:

Please mark with a cross in the boxes as appropriate

(1) Legally compliant

Yes

Various

No

Various

(2) Sound

Yes

Various

No

Various

(3) Complies with the  
duty to co-operate

Yes

No comment

No

No comment

**3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see letter and appendices (Savills, 9 April 2021).

(Continue on a separate sheet / expand box if necessary)



**4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 3 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please see letter and appendices (Savills, 9 April 2021).

(Continue on a separate sheet / expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?**

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing sessions(s)

☒

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.**

Please see letter and appendices (Savills, 9 April 2021).

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they may wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

## Part 3: Declaration

### Data Protection

The personal information you provide on this form will be processed in accordance with the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003. The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004, and may be used by the Council to contact you, if necessary, regarding your submission. Under Regulation 22, we have a duty to send all representations to the appointed Planning Inspector. Your name, organisation name (if relevant), comments and town/parish of residence will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and we will not publish any personal data beyond what is stated in this declaration.

**Please sign and date this form.** Forms signed electronically will be accepted.

### Declaration:

**By completing and signing this form, I agree to my name, organisation, town/parish of residence and representations being made available for public inspection.**

**Signature:**

**Date:**

09/04/2021

**Appendix 5**  
**London Resort and Dartford Local Plan timescales**

**Table A5.1: London Resort and Dartford Local Plan timescales**

	2021												2022												2023											
	Q1			Q2			Q3			Q4			Q1			Q2			Q3			Q4			Q1			Q2			Q3			Q4		
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
London Resort <sup>1</sup>																																				
Acceptance																																				
Pre-examination <sup>2</sup>																																				
Pre-examination meeting(s)																																				
Examination																																				
Recommendation																																				
Secretary of State’s decision																																				
Dartford Local Plan <sup>3</sup>																																				
Publication																																				
Submission																																				
Examination																																				
Adoption																																				
Review																																				

<sup>1</sup> Estimated programme

<sup>2</sup> Pre-examination period extended as a consequence of Swanscombe Peninsula Site of Special Scientific Interest

<sup>3</sup> Dates taken from Local Development Scheme 2021

**Appendix 6**  
**Detailed comments**

## Detailed comments

### Notes

- (a) **Page(s)** – this column identifies the relevant page(s) of the RPSDLP.
- (b) **Paragraph / Policy / Policies Map** – this column identifies the relevant Paragraph / Policy / Policies of the RPSDLP (Question 1 of Representation Form).
- (c) **Legally compliant** – this column identifies whether LRCH is of the view the relevant part of the RPSDLP is legally compliant or not (Question 2(1) of Representation Form).
- (d) **Sound** – this column identifies whether LRCH is of the view the relevant part of the RPSDLP is sound or not, in accordance with the four tests of soundness (P - Positively prepared; J – Justified; E – Effective; and C – Consistent with national policy). A 'cross' (✖) signals LRCH believes it fails the relevant test, a 'tick' (✓) signals LRCH believes it passes the relevant test while a question mark (?) signals LRCH has no comment to make at this stage (Question 2(2) of the Representation Form).
- (e) **Complies with the duty to co-operate** – this column identifies whether LRCH is of the view the relevant part of the RPSDLP complies with the duty to co-operate or not (Question 2(3) of Representation Form).
- (f) **LRCH comments** – this column provides the initial comments of LRCH on the RPSDLP and why it is considered the RPSDLP is/is not legally compliant, sound or fails to comply with the duty to co-operate (Question 3 of Representation Form).
- (g) **Supporting evidence base** – this column identifies the London Resort DCO application documents which support the comments made by LRCH in column (e). Supporting evidence documents are appended and can also be viewed on the PINS Examination Library [here](#). A full list and individual download links is provided at **Appendix 7**.
- (h) **Modifications necessary** – this column identifies the modifications necessary for the RPSDLP to be found legally compliant and sound (Question 4 of Representation Form). In some instances recommended wording changes is provided in a tracked change format with additions as underlined text and deletions as ~~striktrough~~ text. In other instances there is a requirement for substantial re-drafting of large sections of the RPSDLP which has not been attempted – in such cases it is not considered appropriate for LRCH to provide such comment and requires significant work by DBC.

## Abbreviations

Abbreviation	Term
DBC	Dartford Borough Council
DCO	Development Consent Order
DLP	Dartford Local Plan
EDC	Ebbsfleet Development Corporation
EiP	Examination in Public
GBC	Gravesham Borough Council
KCC	Kent County Council
LRCH	London Resort Company Holdings Limited
LTC	Lower Thames Crossing
NPPF	National Planning Policy Framework (February 2019)
NSIP	Nationally Significant Infrastructure Project
PINS	Planning Inspectorate
RPSDLP	Revised Pre-Submission Dartford Local Plan to 2037 (Publication) Document (September 2021)
SSSI	Site of Special Scientific Interest
TC	Thurrock Council

**Table A6.1: LRCH's detailed comments to the Revised Pre-Submission Dartford Local Plan to 2037 (Publication) Document (September 2021)**

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
5-18	1. Introduction	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	Chapter 1 fails to recognise or reference the emergence of the London Resort in its entirety.  The London Resort is a NSIP for which a DCO application was submitted on 31 December 2020 and accepted for examination by PINS on 28 January 2021. Given the significance of the London Resort and its implications upon the Borough there is a need for early identification as to the potential economic, environmental and social benefits it can 'unlock'. The 'scene setting' and contextual chapters for the DLP should include explicit reference to the London Resort as a basis which will help inform the Borough Strategy &	N/A	Chapter 1 needs to be comprehensively re-written to include recognition of the London Resort as important 'scene setting' for Borough Strategy & Objectives that support and encourage the delivery of the London Resort.



(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					<p>Objectives, as set out in Chapter 2 (see below).</p> <p>In failing to recognise the London Resort, LRCH believe the DLP has not been positively prepared, is not justified and is not consistent with national policy.</p>		
19-47	2. Borough Strategy & Objectives	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	<p>As with Chapter 1, when read as a whole, this Chapter fails to recognise or reference the emergence of the London Resort. In failing to develop the Borough's Strategy &amp; Objectives with the London Resort in mind the overall approach within the DLP and the detailed text/policies that follow are flawed.</p> <p>In failing to recognise the London Resort, LRCH believe the DLP has not been positively prepared, is not justified and is not</p>	N/A	Chapter 2 needs to be comprehensively re-written to include a focus on the London Resort and its development influencing the Borough's Strategy & Objectives. Specifically, there is a need for the London Resort to be identified as a critical component to delivering many of the overarching strategies contained within the RPSDLP (e.g. urban regeneration, prosperous economy). To do so, the London Resort should be explicitly referenced, supported and an objective

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					consistent with national policy.		added (see comments on paragraph 2.2 below).
19-21	2.2	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	<p>The RPSDLP identifies a number of Strategic Objectives to deliver the vision of the DLP, noting planning decisions should pursue social, environmental and economic objectives.</p> <p>The London Resort is expected to make a very significant contribution to a number of the identified objectives (see, in the round, <b>7.4 Planning Statement</b>) however there is no explicit recognition of the London Resort in any of the objectives.</p> <p>We believe the London Resort is plainly of such significance that it warrants its own objective.</p> <p>The London Resort will deliver notable benefits</p>	7.4 Planning Statement	<p>This section needs to be re-written to include specific reference to the London Resort given it's significant benefits. The most appropriate means to achieve this is the introduction of a specific, overarching objective recognising the potential of the London Resort.</p> <p>Add under 'Objectives for infrastructure and economic investment:' of a fifth objection as follows:</p> <p><i><u>"15: Support the delivery of the London Resort as a Nationally Significant Infrastructure Project upon the Swanscombe Peninsula to realise the substantial economic benefits for the local, regional and national economies."</u></i></p>

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					across all three topics identified (well-being of communities, infrastructure and economic investment and green and attractive environment) however given its NSIP status, an objective for the London Resort is probably best placed under the 'infrastructure and economic investment' category.		Corresponding modifications are also required to Table 9 on page 206.
20	2.2	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	Objective I1 seeks: <i>“Continuing urban regeneration through optimising the re-use of accessible and suitable brownfield land primarily within the north of the Borough to meet future local housing and employment needs, and delivering new infrastructure for travel, schools/ skills, health, and other local services.”</i>	6.2.7.7 ES Appendix 7.7 Outline Employment and Skills Strategy  7.4 Planning Statement  7.5 Economic and Regeneration Statement	The significant contribution the London Resort makes to this objective is added recognition as to why it should be more positively reflected within the DLP as a whole.

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					<p>The London Resort positively responds to these aspirations, including:</p> <ul style="list-style-type: none"> <li>▪ Represents a significant urban regeneration project</li> <li>▪ Will optimise the re-use of accessible brownfield land, addressing significant ground contamination issues</li> <li>▪ Will generate substantial levels of employment opportunities. Please refer to documents <b>6.2.7.7 ES Appendix 7.7 Outline Employment and Skills Strategy</b> and <b>7.5 Economic and Regeneration Statement</b>.</li> <li>▪ Will include provision through the proposed staff accommodation to help address</li> </ul>		

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					<p>accommodation needs of workers and helping to reduce pressures on the local housing market. Please refer to <b>7.4 Planning Statement.</b></p> <p>In failing to recognise the London Resort, LRCH believe the DLP has not been positively prepared, is not justified and is not consistent with national policy.</p>		
20	2.2	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	<p>Objective I4 seeks: <i>“Retaining a prosperous economy with a good choice of jobs per resident, increasing high quality, accessible, local employment opportunities, maintaining a diverse supply of premises and supporting existing business needs in the urban area; with Ebbsfleet providing a productive mix of new</i></p>	<p>6.2.7.7 Outline Employment and Skills Strategy</p> <p>7.5 Economic and Regeneration Statement</p>	The significant contribution the London Resort makes to this objective is added recognition as to why it should be more positively reflected within the DLP as a whole.

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					<p><i>commercial, community and residential activities.”</i></p> <p>It is imperative to note that the London Resort positively responds to these aspirations, including:</p> <ul style="list-style-type: none"> <li>▪ Will generate substantial levels of employment opportunities. Please refer to both the <b>6.2.7.7 Outline Employment and Skills Strategy</b> and <b>7.5 Economic and Regeneration Statement</b>.</li> <li>▪ Delivery substantial local, regional and national supply chain benefits. Please refer to <b>7.5 Economic and Regeneration Statement</b>.</li> </ul> <p>In failing to recognise the London Resort, LRCH believe the DLP has not been positively prepared,</p>		

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					is not justified and is not consistent with national policy.		
20	2.2	No comment	P - ✕ J - ✕ E - ? C - ✕	No comment	<p>Objective G4 seeks:  <i>“Promoting sustainable local environments and habitats, achieving biodiversity net gain and active and healthy living, at new developments and through greenspace and landscape protection and provision; enhancing the green grid of footpaths, public rights of way, cycle routes, wildlife corridors, rivers and countryside link.”</i></p> <p>It is imperative to note that the London Resort positively responds to these aspirations, including:</p> <ul style="list-style-type: none"> <li>Achieving Biodiversity Net Gain. Please refer to <b>6.1.12 ES Chapter 12 – Terrestrial and</b></li> </ul>	<p>2.6 Access, Rights of Way and Public Rights of Navigation Plans</p> <p>2.20 Illustrative Landscape Plans</p> <p>6.1.11 ES Chapter 11 – Landscape and visual effects</p> <p>6.1.12 ES Chapter 12 – Terrestrial and freshwater ecology and biodiversity</p> <p>6.2.11.7 ES Appendix 11.7 Landscape Strategy</p> <p>6.2.11.8 ES Appendix 11.8</p>	The significant contribution the London Resort makes to this objective is added recognition as to why it should be more positively reflected within the DLP as a whole.

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					<p><b>freshwater ecology and biodiversity and 6.2.12.2 ES Appendix 12.2 Biodiversity Net Gain Assessment.</b></p> <ul style="list-style-type: none"> <li>▪ Deliver comprehensive landscape proposals across the Swanscombe Peninsula. Please refer to <b>2.20 Illustrative Landscape Plans, 6.1.11 ES Chapter 11 – Landscape and visual effects, 6.2.11.7 ES Appendix 11.7 Landscape Strategy and 6.2.11.8 ES Appendix 11.8 Landscape and Ecology Management Plan.</b></li> <li>▪ Deliver a comprehensive and integrated network of footpaths, public</li> </ul>	<p>Landscape and Ecology Management Plan</p> <p>6.2.11.9 ES Appendix 11.9 Public Rights of Way Assessment and Strategy</p> <p>6.2.12.2 ES Appendix 12.2 Biodiversity Net Gain Assessment</p>	



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					<p>rights of way, and cycle routes. Please refer to <b>2.6 Access, Rights of Way and Public Rights of Navigation Plans</b> and <b>6.2.11.9 ES Appendix 11.9 Public Rights of Way Assessment and Strategy</b>.</p> <p>In failing to recognise the London Resort, LRCH believe the DLP has not been positively prepared, is not justified and is not consistent with national policy.</p>		
22	2.6	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	This paragraph recognises the Dartford Core Strategy (September 2011) has long recognised the strategic ambitions for development across areas in Kent, Greater London and Essex on the River Thames. LRCH is of the view that the	N/A	The strategy of the DLP must be re-written to recognise and positively plan for the delivery of the London Resort.

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					<p>London Resort will be a significant driver in the delivery of the regeneration of the Thames Gateway area.</p> <p>In failing to recognise the London Resort, LRCH believe the DLP has not been positively prepared, is not justified and is not consistent with national policy.</p>		
23	2.7	No comment	P - ✕ J - ✕ E - ? C - ✕	No comment	<p>Paragraph 2.7 recognises <i>“There continues to be clear potential for the more efficient use of brownfield land and sustainable locations, combined with the location of jobs and homes...”</i>.</p> <p>The London Resort will contribute towards this ambition by bringing forward a substantial area of previously development and contaminated land. Please refer to <b>6.1.18 ES</b></p>	6.1.18 ES Chapter 18 – Soils, hydrogeology and ground conditions	The strategy of the DLP must be re-written to recognise and positively plan for the delivery of the London Resort.

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					<p><b>Chapter 18 – Soils, hydrogeology and ground conditions.</b></p> <p>In failing to recognise the London Resort, LRCH believe the DLP has not been positively prepared, is not justified and is not consistent with national policy.</p>		
23	2.12	No comment	N/A	No comment	<p>This paragraph provides recognition of the regeneration efforts around Ebbsfleet Garden City. LRCH strongly believes that the delivery of the London Resort would accelerate the delivery of Ebbsfleet Central which has so far failed to deliver in 15 years, despite extant planning permissions being in place. Please refer to <b>7.4 Planning Statement</b> and <b>7.5 Economic and Regeneration Statement</b>.</p>	<p>7.4 Planning Statement</p> <p>7.5 Economic and Regeneration Statement.</p>	N/A

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24	2.15	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	This paragraph recognises the constraints placed upon the Borough with regards to large areas of land being designated as Metropolitan Green Belt. The redevelopment of brownfield land is promoted through national planning policy (see, for example, Paragraph 119 of the NPPF) and helps relieve pressure on rural areas. In this regard, the London Resort will deliver the regeneration of significant areas of contaminated former industrial brownfield land across the Swanscombe Peninsula. The significant constraints presented by the ground conditions are considered to present genuine barriers to the delivery of alternative land uses across much of the Swanscombe	6.1.18 ES Chapter 18 – Soils, hydrogeology and ground conditions	The strategy of the DLP must be re-written to recognise and positively plan for the delivery of the London Resort.

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					<p>Peninsula, especially sensitive receptors such as residential land uses. Please refer to <b>6.1.18 ES Chapter 18 – Soils, hydrogeology and ground conditions.</b></p> <p>In failing to recognise the ability for the London Resort to deliver regeneration across the Swanscombe Peninsula, LRCH believe the DLP has not been positively prepared, is not justified and is not consistent with national policy.</p>		
25	Diagram 1: Key Diagram	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	<p>We note Diagram 1 has been updated to reflect the Swanscombe Peninsula SSSI. In light of other comments made by LRCH, Diagram 1 must be updated to reflect not only the SSSI but also the proposed development of the London Resort, reflecting not only the built form but also the</p>	<p>2.20 Illustrative Landscape Plans</p> <p>2.21 Illustrative Masterplan</p>	<p>Update Diagram 1 to reflect the proposed development of the London Resort, replacing the Employment Area currently shown, and introduction of the areas of retained marshland as shown on <i>2.20 Illustrative Landscape Plans</i> and <i>2.21 Illustrative Masterplan</i>.</p>

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					significant areas of land which across the Swanscombe Peninsula that would be subject to environmental and ecological improvements. Please refer to Please refer to <b>2.20 Illustrative Landscape Plans</b> and <b>2.21 Illustrative Masterplan</b> .		
26	Policy S1: Borough Spatial Strategy	No comment	P - ✕ J - ✕ E - ? C - ✕	No comment	Policy S1 is a long policy setting out the Borough's spatial strategy. While LRCH find much to support within the policy, its significant oversight is the absence of any recognition of the London Resort in its role in informing the spatial strategy of the Borough as a nationally significant project which probably represents itself as the largest project to come forward within the Borough over the plan period, and the largest	6.2.7.7 ES Appendix 7.7 Outline Employment and Skills Strategy  6.2.14.1 ES Appendix 14.1 Archaeological Desk-based Assessment, December 2020  6.2.14.2 ES Appendix 14.2 Built Heritage Statement, December 2020	Amend Policy S1 as follows:  <i>"...3. The overriding priority for development in the Borough is at:</i>  <i>a) Central Dartford; <del>and</del></i> <i>b) Ebbsfleet Garden City; <u>and</u></i> <i>c) <u>Swanscombe Peninsula for the delivery of the London Resort</u></i>  <i>These growth locations will be regenerated with the provision of new and improved infrastructure and strategic mixed used development."</i>

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					<p>leisure based scheme emerging in Europe.</p> <p>The London Resort is considered to accord to the objectives of many aspects of the policy, as indicated by the overview in the following paragraphs.</p> <p>Part 1 encourages sustainable development, new infrastructure and the re-use of brownfield land. In this regard, proposals for the London Resort are considered to be in line with its requirements.</p> <p>Part 2 of the policy seeks to direct development to accessible brownfield sites. As mentioned through <b>6.1.4 Project development and alternatives</b>, the site selection process for the London Resort was informed by the strong opportunity for the regeneration across</p>	<p>6.2.14.3 ES Appendix 14.3 Historic Landscape Characterisation, October 2020</p> <p>6.2.14.4 ES Appendix 14.4 Desk-based Assessment and Statement of Archaeological Significance (Palaeolithic) for main access road (eastern route) and people-mover train / cycle route options, July 2017</p> <p>6.2.14.5 ES Appendix 14.5 Technical Note 1. People Mover Route. Alignment Options Appraisal, 2020</p>	<p><i>“6. The Urban Area is defined as the area to the north of the A2 and outside the Green Belt. Within this area, additional to strategic growth at central Dartford, <del>and</del> Ebbsfleet Garden City <u>and the London Resort</u>, developments with permission will be completed and additional development will occur at the Urban Area neighbourhoods of Dartford, Stone, Greenhithe and Swanscombe. This will include: ...”</i></p> <p><i>“7. Significant jobs, major commercial activity and new employment premises will be prioritised within central Dartford, <del>and</del> Ebbsfleet Garden City <u>and through the delivery of the London Resort</u>. Economic development will occur at locations elsewhere in the urban area where this is consistent with sustainable growth patterns and provides suitable improvement/</i></p>

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					<p>largely brownfield sites and its excellent transport connections.</p> <p>Part 3 identifies where “the overriding priority for development in the Borough” is, identifying Central Dartford and Ebbsfleet Garden City. The London Resort will contribute to the mix of uses within Ebbsfleet Garden City, provide a huge stimulus to local centres and the new Ebbsfleet Central.</p> <p>Part 4 requires heritage assets to be “conserved and enhanced in a manner appropriate to their significance.” The detailed and methodical approach towards heritage will ensure the London Resort will conserve heritage assets appropriately. Please refer to <b>6.2.14.1 ES Appendix 14.1 Archaeological Desk-</b></p>	<p>6.2.14.8 ES Appendix 14.8 Land north of Springhead Nursery, Archaeological Evaluation Report, 2017</p> <p>6.2.14.9 ES Appendix 14.9 Historic Environment Framework, December 2020</p> <p>6.2.14.10 ES Appendix 14.10 Summary of Impacts, Mitigation and Residual Effects</p> <p>7.4 Planning Statement</p> <p>7.5 Economic and Regeneration Statement</p>	<p><i>intensification of commercial locations. Economic growth will be based on a strategy of: ...”</i></p> <p><i>“8. Economic development and jobs growth will be delivered principally through providing sufficient development opportunities for:</i></p> <ul style="list-style-type: none"> <li><i>a) New development land at, and additional floorspace within, the identified employment areas.</i></li> <li><i>b) Redevelopment for modern retail/ leisure premises and community facilities within the retail centres. The network of retail centres comprises:</i> <ul style="list-style-type: none"> <li><i>i) Dartford Town Centre, which will attract a wide range of new businesses;</i></li> <li><i>ii) Bluewater, which will continue its regional</i></li> </ul> </li> </ul>



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					<p>based Assessment, December 2020, 6.2.14.2 ES Appendix 14.2 Built Heritage Statement, December 2020, 6.2.14.3 ES Appendix 14.3 Historic Landscape Characterisation, October 2020, 6.2.14.4 ES Appendix 14.4 Desk-based Assessment and Statement of Archaeological Significance (Palaeolithic) for main access road (eastern route) and people-mover train / cycle route options, July 2017, 6.2.14.5 ES Appendix 14.5 Technical Note 1. People Mover Route. Alignment Options Appraisal, 2020, 6.2.14.8 ES Appendix 14.8 Land north of Springhead Nursery, Archaeological Evaluation Report, 2017, 6.2.14.9 ES Appendix 14.9 Historic Environment</p>		<p><i>economic contribution;</i></p> <p><i>iii) District Centres at Dartford, Ebbsfleet, Swanscombe and Longfield; and</i></p> <p><i>iv) Local Centres in the urban area and at villages.</i></p> <p><i>c) <u>The delivery of the London Resort and spin-off developments, especially within the supply chain, creative, hospitality and leisure sectors.</u></i></p>

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					<p><b>Framework, December 2020, 6.2.14.10 ES Appendix 14.10 Summary of Impacts, Mitigation and Residual Effects.</b></p> <p>Part 5 notes that <i>“designated sites of biodiversity value will be protected, and improvement of ecological sites and networks maximised.”</i></p> <p>The ecological proposals in the delivery of the London Resort are considered to assist in delivering improvements and a biodiversity net gain. LRCH is, of course, aware of the Swanscombe Peninsula SSSI which includes areas proposed for development by the London Resort and also into Ebbsfleet Valley, covering significant areas earmarked for</p>		

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					<p>development by EDC around Ebbsfleet Central.</p> <p>Part 6 sets out the approach to be taken for the 'Urban Area', defined as the area to the north of the A2 and outside the Metropolitan Green Belt. It continues to identify strategic growth will take place at central Dartford and Ebbsfleet Garden City but fails to recognise the delivery of the London Resort upon the Swanscombe Peninsula.</p> <p>Part 7 sets out a high level economic strategy, noting that <i>"Significant jobs, major commercial activity and new employment premises will be prioritised within central Dartford and Ebbsfleet Garden City."</i></p> <p>Aligned to this, Part 8 notes that <i>"economic development and jobs growth will be delivered</i></p>		

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					<p><i>principally through providing sufficient development opportunities...</i></p> <p>In this regard, owing to its significance, the London Resort is expected to act as an economic engine for Ebbsfleet Garden City and the Borough. Many key aspects are identified through <b>7.5 Economic and Regeneration Statement</b>, including providing for a significant number of direct employment opportunities, with an estimated 17,310 workers (11,215 FTEs) at maturity upskilling the local workforce and adding to the local, regional and national economy. Support up to 48,000 direct, indirect and induced jobs by 2038, creating knock on benefits to the economy. These matters are also</p>		

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					<p>discussed in <b>7.4 Planning Statement</b> and <b>6.2.7.7 ES Appendix 7.7 Outline Employment and Skills Strategy</b>.</p> <p>As a result of the above comments there is a need for Policy S1 to be redrafted to include recognition of the London Resort given its importance in forming and shaping the strategic direction for the Borough.</p>		
29	Diagram 2: Infrastructure Diagram	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	Diagram 2 identifies Swanscombe station as a site for 'Potential Station Upgrades'. As identified by LRCH during pre-application proposals, the London Resort is supported by a robust transport strategy set out in length through the DCO documents. Please refer to <b>6.1.9 ES Chapter 9 – Land transport</b> , <b>6.1.10 ES Chapter 10 –</b>	6.1.9 ES Chapter 9 – Land transport 6.1.10 ES Chapter 10 – River transport	<p>Add to Diagram 2:</p> <ol style="list-style-type: none"> <li>1) Proposed routing of the London Resort Access Road from A2(T), via Ebbsfleet Central to Swanscombe Peninsula</li> <li>2) Proposed routing of People Mover from Ebbsfleet Central to Swanscombe Peninsula.</li> <li>3) Proposed ferry terminal at Swanscombe Peninsula.</li> </ol>

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					<p><b>River transport</b> and their supporting appendices.</p> <p>The London Resort transport strategy makes it clear that it is not dependent upon the delivery of upgrades to Swanscombe station. While LRCH support the principle of upgrades to transport infrastructure (and it engaging with Network Rail on various matters) its own transport strategy means it is not responsible for facilitating or paying for upgrades to the station. It is anticipated Network Rail will lead on the delivery of any improvements to Swanscombe Station.</p> <p>The London Resort proposes a dedicated London Resort Access Road from its junction with the A2(T), via Ebbsfleet Central and onto Swanscombe Peninsula and a People</p>		

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					<p>Mover route from Ebbsfleet Central to the Swanscombe Peninsula. Diagram 2 does not currently depict the routes of either. Given their strategic importance to the transport strategy and their scale as infrastructure necessary to support the London Resort, both should be identified within Diagram 2.</p> <p>The London Resort proposes a new ferry terminal towards the northern tip of the Swanscombe Peninsula. Diagram 2 does not currently show this. Although delivered by LRCH, there is a commitment (likely to be secured via Requirements or Section 106 Agreement) for public access to be provided to this ferry terminal. With services proposed to the</p>		

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					<p>Port of Tilbury, central London and possible Grays Pier (subject to delivery by third parties) the ferry terminal will provide an important new means to exploit travel along the River Thames.</p> <p>The London Resort will deliver significant enhancements to flood defences around the Swanscombe Peninsula.</p> <p>In failing to recognise the London Resort Access Road, People Mover, ferry terminal and significant enhancements to the flood defences, LRCH believe the DLP has not been positively prepared or consistent with national policy.</p>		
30	2.20	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	<p>This paragraph recognises the DLP <i>"looks towards 2037"</i>. Given the timeframe which is being considered by the DLP this reinforces</p>	N/A	<p>Given the significance of the London Resort in informing and influencing the strategy of the DLP needs to be mindful and consider the timescales and proposed</p>



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					<p>the importance of fully incorporating the London Resort and its delivery.</p> <p>Paragraph 22 of the NPPF notes that <i>“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.”</i></p> <p>In failing to recognise the London Resort as a long-term opportunity, LRCH believe the RPSDLP has not been positively prepared, is not justified and is not consistent with national policy.</p>		<p>maturity of the London Resort. The strategy of the DLP must be re-written to recognise and positively plan for the delivery of the London Resort.</p>
32	2.32	No comment	P - ? J - ? E - ? C - ?	No comment	Paragraph 2.32 identifies a range of transport infrastructure investments that are to be supported by DBC. It is interesting to note support is being	N/A	Amend Paragraph 2.32 so as to ensure a consistent approach is taken within the RPSDLP with regards to

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					<p>identified for the Lower Thames Crossing yet this project does not yet have development consent. This is an apparent contradiction to the approach taken with the London Resort which is actually in a more advanced state of receiving development consent than the LTC.</p> <p>Putting aside the above, LRCH has also previously publically signalled its support for the delivery of the LTC although it has made clear that its own transport strategy is not contingent upon the delivery of the LTC.</p>		emerging projects and their delivery.
32	2.34	No comment	P - ? J - ? E - ? C - ?	No comment	<p>Paragraph 2.34, amongst other matters, recognises</p> <p><i>“The Borough’s planning policies also consistently seek measures to secure major modal shifts in transport choice in favour of expanded active travel</i></p>	<p>6.2.9.1 ES Appendix 9.1 Appendix TA-U Rail Strategy Plan (23 of 33)</p> <p>6.2.9.1 ES Appendix 9.1 Appendix TA-V</p>	N/A

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					<p><i>and public transport. These offer clear benefits for efficient travel and wellbeing, avoiding vehicular congestion, improving air quality and promoting healthy living."</i></p> <p>In this regard, it is important to note the London Resort's transport strategy which seeks to deliver a modal split which maximises the use of public transport systems, to include the use of Ebbsfleet International Station (thus High Speed 1), Fastrack and the use of the River Thames. Please refer to <b>6.2.9.1 ES Appendix 9.1 Appendix TA-U Rail Strategy Plan (23 of 33), 6.2.9.1 ES Appendix 9.1 Appendix TA-V Bus Strategy Plan (24 of 33) and 6.2.9.1 ES Appendix 9.1 Appendix TA-W Uber Boats by Thames</b></p>	<p>Bus Strategy Plan (24 of 33)</p> <p>6.2.9.1 ES Appendix 9.1 Appendix TA-W Uber Boats by Thames Clipper Operation Proposal (25 of 33)</p>	

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					<b>Clipper Operation Proposal (25 of 33).</b>		
33	2.36	No comment	P - ? J - ? E - ? C - ?	No comment	<p>Paragraph 2.36 recognises the potential for better rail connectivity with Elizabeth Line (Crossrail) line at Abbey Wood west of the Borough to Ebbsfleet International Station. Again, it is interesting to note support is being identified for an extension to the Elizabeth Line yet this project does not yet have development consent. This is an apparent contradiction to the approach taken with the London Resort which is in a more advanced state of receiving development consent.</p> <p>Putting aside the above, LRCH has also previously publically signalled its support for the delivery of an extension to the Elizabeth Line although it</p>	N/A	Amend Paragraph 2.36 so as to ensure a consistent approach is taken within the RPSDLP with regards to emerging projects and their delivery.

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					<p>has made clear that its own transport strategy is not contingent upon the delivery of such.</p> <p>LRCH is part of lobby group for Elizabeth Line extension and a key factor in its potential justification given the large number of visitors expected to the London Resort annually.</p>		
34	2.37	No comment	No comment	No comment	<p>The London Resort transport strategy makes it clear that it is not dependent upon the delivery of upgrades to Swanscombe station. While LRCH support the principle of upgrades to transport infrastructure (and it engaging with Network Rail on various matters) its own transport strategy means it is not responsible for facilitating or paying for upgrades to the station. It is anticipated Network Rail</p>	6.2.9.1 ES Appendix 9.1 Appendix TA-U Rail Strategy Plan (23 of 33)	N/A

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					will lead on the delivery of any improvements to Swanscombe Station. Please refer to <b>6.2.9.1 ES Appendix 9.1 Appendix TA-U Rail Strategy Plan (23 of 33)</b> .		
33	2.38	No comment	P - ✕ J - ✕ E - ? C - ✕	No comment	This paragraph recognises the benefits and role to be played by Fastrack and notes that major improvements are required to Fastrack route infrastructure, including identifying the expansion of Fastrack services in the Swanscombe Peninsula area. LRCH support the delivery and improvements to Fastrack and expansion into Swanscombe Peninsula. There has been regular engagement with Fastrack with regards to serving the London Resort (including staff accommodation) and the use of People Mover routes. LRCH therefore	6.2.9.1 ES Appendix 9.1 Appendix TA-V Bus Strategy Plan (24 of 33)	N/A

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					support the delivery and improvements to Fastrack. Please refer to <b>6.2.9.1 ES Appendix 9.1 Appendix TA-V Bus Strategy Plan (24 of 33).</b>		
35	Policy S2: Infrastructure Planning Strategy	No comment	P - ✕ J - ✕ E - ? C - ✕	No comment	<p>Part 1 of Policy S2, as currently drafted, notes that <i>“Borough development will be plan-led, and major proposals masterplanned and phased, in order to ensure the co-ordinated delivery of new infrastructure...”</i></p> <p>This requirement is therefore at odds with the decision to not actively plan for the delivery of the London Resort. LRCH support the thrust of the sentiment of plan-led and masterplanning approaches being taken which justifies the requirement for the London Resort to be considered and reflected</p>	6.2.9.1 ES Appendix 9.1 Appendix TA-K Highway Works - General Arrangement Drawings (13 of 33)	The strategy of the DLP must be re-written to recognise and positively plan for the delivery of the London Resort.

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					<p>within the spatial strategy of the borough. A failure to plan for the London Resort would be in direct conflict with what Policy S2 seeks to achieve.</p> <p>Part 2 to Policy S2, as currently drafted, amongst other matters, seeks to ensure <i>"sustainable access."</i> LRCH is supportive of this approach and notes that its proposals will support these connections and improve walking and cycling permeability through and across the Swanscombe Peninsula, for example by facilitating improvements to Pilgrims Way and the England Coast Path.</p> <p>Part 4 to Policy S2, as currently drafted, supports the delivery of strategic transport upgrades. In this regard, LRCH welcomes the recognition of the</p>		



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					importance of rail, Fastrack, highways and the use of the River Thames. With regards to a), although its own transport strategy is not dependent upon such, LRCH is supportive of lobbying attempts to promote the extension of the Elizabeth Line from Abbey Wood through to Ebbsfleet International. LRCH has recently (February 2021) responded to consultation by C2E Partnership to this effect. With regards to b), on a similar basis, LRCH is supportive of investments and upgrades to Fastrack within Kent. LRCH and its advisors have been in regular dialogue with Fastrack to ensure its integration with the London Resort, for use by both visitors and staff. Please refer to <b>6.2.9.1 ES Appendix 9.1 Appendix</b>		

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					<p><b>TA-V Bus Strategy Plan (24 of 33).</b> With regards to c), the London Resort will facilitate the upgrade of the A2(T) Ebbsfleet junction. Please refer to <b>6.2.9.1 ES Appendix 9.1 Appendix TA-K Highway Works - General Arrangement Drawings (13 of 33).</b></p> <p>With regards to d), as noted elsewhere in these representations the London Resort seeks to deliver a new ferry terminal on the Swanscombe Peninsula. The ferry terminal will be publically accessible, thus encouraging sustainable transport options for passengers to the London Resort and members of the public requiring services to/from Swanscombe Peninsula, Port of Tilbury, Central London and (subject to third party delivery) a Grays Pier. The ferry</p>		

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					<p>terminal will also serve the London Resort during construction and operational phases.</p> <p>Part 5 to Policy S2, as currently drafted, relates to strategic infrastructure provision. The London Resort will provide strategic infrastructure in respect of meeting its own needs but which also deliver wider benefits. For example, the delivery of improved flood defences at the Swanscombe Peninsula.</p> <p>Part 6 of Policy S2, as currently drafted, seeks to upgrade and expand the Borough's Green Grid network. The London Resort proposals will support "green grid" and biodiversity.</p> <p>Part 7 of Policy S2, as currently drafted, seeks to ensure developments provide appropriate</p>		

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					<p>contributions to infrastructure provision LRCH has always been clear it will provide Community Infrastructure Levy and Section 106 Agreements where the necessary tests are met.</p> <p>In failing to recognise the London Resort, LRCH believe the DLP has not been positively prepared, is not justified and is not consistent with national policy.</p>		
38	Diagram 3: Strategic Green Grid	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	<p>LRCH note the changes made to this diagram and comments are also made in respect of the inset provided in Diagram 11 below.</p> <p>LRCH object to Diagram 3 as drawn. For reasons explored within other parts of these representations, the delivery of the London Resort upon the Swanscombe Peninsula</p>	<p>2.6 Access, Rights of Way and Public Rights of Navigation Plans</p> <p>2.20 Illustrative Landscape Plans</p> <p>6.1.11 ES Chapter 11 – Landscape and visual effects</p>	<p>Amend Diagram 3 as follows:</p> <ul style="list-style-type: none"> <li>Amend the boundaries to 'Strategic Green Infrastructure' to reflect the boundaries of the built form of the London Resort, as demonstrated by 2.21 <i>Illustrative Masterplan</i>.</li> <li>Ensure alignment of 'Potential links – to deliver' to reflect the</li> </ul>

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					<p>should be recognised and fully supported.</p> <p>The extensive provision of 'Strategic Green Infrastructure' across the Swanscombe Peninsula as currently drafted including areas subject to development of the London Resort 'Core' by LRCH and is therefore at odds with its delivery and contrary to the stated position of DBC that it supports the London Resort.</p> <p>The London Resort seeks to deliver comprehensive landscape proposals across the Swanscombe Peninsula. Please refer to <b>2.20 Illustrative Landscape Plans, 6.1.11 ES Chapter 11 – Landscape and visual effects, 6.2.11.7 ES Appendix 11.7 Landscape Strategy and 6.2.11.8 ES Appendix 11.8 Landscape and</b></p>	<p>6.2.11.7 ES Appendix 11.7 Landscape Strategy</p> <p>6.2.11.8 ES Appendix 11.8 Landscape and Ecology Management Plan</p> <p>6.2.11.9 ES Appendix 11.9 Public Rights of Way Assessment and Strategy</p>	<p>links presented through the <i>2.20 Illustrative Masterplan</i>.</p>

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					<p><b>Ecology Management Plan.</b></p> <p>The London Resort also seeks to deliver a comprehensive and integrated network of footpaths, public rights of way, and cycle routes. Please refer to <b>2.6 Access, Rights of Way and Public Rights of Navigation Plans</b> and <b>6.2.11.9 ES Appendix 11.9 Public Rights of Way Assessment and Strategy.</b></p> <p>Diagram 3 must therefore reflect the development proposals being progressed by LRCH. In failing to recognise the London Resort, LRCH believe the DLP has not been positively prepared, is not justified and is not consistent with national policy.</p>		

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82	4.7	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	LRCH welcome changes made to paragraph 4.7. As could be expected for a development of this scale and complexity, the process is incredibly complex and requires detailed progression on a number of technical and commercial fronts. The DCO application has since been 'Accepted' on 28 January 2021 and is progressing towards Examination. The paragraph should be further amended to recognise the proposals.	N/A	Amend paragraph 4.7 to recognise the progress that has been made on the emergence of the London Resort as follows:  <i>“...The Peninsula area is currently subject to developer proposals for an <u>global</u> entertainment resort, with detailed proposals emerging since 2014.”</i>
83	4.9	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	Paragraph 4.9 identifies a number of “ <i>prominent resources, and factors vital to future prospects in the area...</i> ”  These include a mix of urban and green spaces, integrating existing green and blue infrastructure, improving accessibility through walking and	6.2.11.7 ES Appendix 11.7 Landscape Strategy  6.2.11.9 ES Appendix 11.9 Public Rights of Way Assessment and Strategy	Add under Paragraph 4.9 as the first bullet point (to demonstrate its significance):  <i>“▪ <u>A substantial opportunity to realise and support the delivery of the London Resort as a global entertainment resort offering significant economic,</u></i>

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					<p>cycling, utilising chalk cliff topography, celebrating cultural, archaeological and industrial heritage and maintaining Swanscombe's distinct character.</p> <p>LRCH believe its proposals will support the delivery and realisation of many of these objectives. For example, please refer to <b>6.2.11.7 ES Appendix 11.7 Landscape Strategy</b> and <b>6.2.11.9 ES Appendix 11.9 Public Rights of Way Assessment and Strategy</b>.</p> <p>Consistent with earlier concerns raised by LRCH, there is a failure to positively prepare for the London Resort with no recognition of potential offer and benefits presented by the London Resort by including it within the list.</p>		<u>environmental and social dividends.</u> "



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					The London Resort will support/deliver many of the objectives, however, in failing to recognise the London Resort itself, LRCH believe the DLP has not been positively prepared, is not justified and is not consistent with national policy.		
87	4.17	No comment	P - ✕ J - ✕ E - ? C - ✕	No comment	<p>LRCH strongly object to the content and corresponding Policies Map allocation as a result of the commentary.</p> <p>Paragraph 4.17 notes <i>"There are ongoing issues to consider, especially at Swanscombe Peninsula. Principally this pertains to the recent notification of the Swanscombe Peninsula Site of Special Scientific Interest (SSSI) on extensive tracts of land in the north and central parts of the Garden City, and the</i></p>	<p>2.6 Access, Rights of Way and Public Rights of Navigation Plans</p> <p>2.21 Illustrative Masterplan</p> <p>6.2.11.7 ES Appendix 11.7 Landscape Strategy</p> <p>6.2.11.8 ES Appendix 11.8 Landscape and Ecology Management Plan</p>	<p>The strategy of the RPSDLP must be amended such that it is compatible with the delivery of the London Resort. This includes amendments to the areas of Borough Open Space to reflect the extent of the physical development of the Leisure Core of the London Resort.</p> <p>The strategy of the DLP must recognise and positively plan for the delivery of the London Resort.</p>

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					<p><i>uncertainty arising as a result of the proposal for a large entertainment resort on the Peninsula (London Resort). Whilst not yet formally approved, the SSSI as notified will need to be protected in accordance with policy M15. The London Resort is proposed as a Nationally Significant Infrastructure Project and an application for a Development Consent Order was submitted to the government in December 2020. The Council and the Ebbsfleet Development Corporation have highlighted various matters that need addressing, including its impact on infrastructure, local communities, the environment and the delivery of development at Ebbsfleet Central. The government's decision on the project will not occur</i></p>	<p>6.2.11.9 ES Appendix 11.9 Public Rights of Way Assessment and Strategy</p>	

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					<p><i>before the submission of the Local Plan."</i></p> <p>Consistent with comments presented elsewhere, LRCH strongly object to the RPSDLP strategy that sees the delivery of the London Resort upon the Swanscombe Peninsula excluded and instead much of the peninsula designated as Borough Open Space.</p> <p>LRCH believes the London Resort can be delivered in addition to providing excellent public access and provisions to green spaces within the Swanscombe Peninsula. Indeed, <b>6.2.11.7 ES Appendix 11.7 Landscape Strategy, 6.2.11.8 ES Appendix 11.8 Landscape and Ecology Management Plan, 2.6 Access, Rights of Way and Public Rights of Navigation</b></p>		

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					<p><b>Plans and 6.2.11.9 ES Appendix 11.9 Public Rights of Way Assessment and Strategy</b> all demonstrate how this can be successfully achieved.</p> <p>In failing to recognise the London Resort, LRCH believe the DLP has not been positively prepared, is not justified and is not consistent with national policy.</p>		
88	Policy E1: Ebbsfleet and Swanscombe Strategy	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	<p>Policy E1 establishes a strategy for Ebbsfleet and Swanscombe Strategy. In a general sense, LRCH find much to support and are encouraged by the aspirations of the policy to deliver long-awaited regeneration of Ebbsfleet Garden City, in particular around Ebbsfleet Central.</p> <p>With particular regards to Part 2), LRCH believe Ebbsfleet Central will be transformed and</p>	<p>6.2.11.7 ES Appendix 11.7 Landscape Strategy</p> <p>6.2.11.8 ES Appendix 11.8 Landscape and Ecology Management Plan</p> <p>6.2.11.9 ES Appendix 11.9 Public Rights of Way</p>	

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					<p>accelerated via the delivery of the London Resort. The delivery of the London Resort is also expected to trigger significant private sector investment in the locality. Part 2) makes reference to <i>“Further development may come forward at suitable land north of Swanscombe.”</i> In line with the general approach of comments by LRCH, the RPSDLP must recognise that much of the land north of Swanscombe falls within the DCO Order Limit of the London Resort, including Crayland’s Lane Pit in which staff accommodation is proposed within the DCO application. Please refer to <b>2.21 illustrative Masterplan</b>. LRCH is therefore of the view that references to mixed-use development to the north of Swanscombe be</p>	Assessment and Strategy	

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					<p>clarified to exclude areas subject to the DCO application.</p> <p>Part 3 seeks to “<i>avoid impacts on the SSSI, supporting and complementing the ecological features of the SSSI</i>”. The London Resort proposals will look to create habitats within the existing marshes and deliver habitat and accessibility improvements. Please refer to <b>6.2.11.7 ES Appendix 11.7 Landscape Strategy, 6.2.11.8 ES Appendix 11.8 Landscape and Ecology Management Plan</b> and <b>6.2.11.9 ES Appendix 11.9 Public Rights of Way Assessment and Strategy</b>.</p>		
90	Diagram 10: Ebbsfleet as	No comment	P - ✕ J - ✕	No comment	Diagram 10 is a new diagram that looks to spatially portray the	2.21 Illustrative Masterplan	Amend Diagram 10 so as to identify the development extent of the London Resort

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	a Garden City		E - ? C - ✖		proposals and designations across the Ebbsfleet area. Consistent with comments made elsewhere, recognition must be given to the proposals for the London Resort.		based upon 2.21 <i>Illustrative Masterplan</i> .
93	4.24	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	<p>This paragraph, as currently drafted, indicates that Swanscombe "...has the potential to be significantly impacted by the proposals for the London Resort on Swanscombe Peninsula, should they proceed."</p> <p>There are two key points to note here. The first relates to the use of the word "impacts" without any qualifying statements or evidence. An assessment as to the likely significant effects is provided within the various technical chapters</p>	<p>6.1.21 ES Chapter 21 – Cumulative, in- combination and transboundary effects</p> <p>6.1.22 ES Chapter 22 – Conclusion and mitigation commitments</p>	<p>Amend paragraph 4.24 to recognise the opportunities presented by the London Resort as follows:</p> <p><i>"The town is located next to ongoing and planned developments at Alkerden and Ashmere (policy E5), Ebbsfleet Central (policy E4), and at the smaller Craylands Lane and Croxton &amp; Garry sites to the north west of the town. It also has the potential to be significantly impacted by the proposals for the London Resort on Swanscombe Peninsula, should they proceed. Swanscombe has the potential to capitalise</i></p>

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					<p>of the Environmental Statement and summarised within <b>6.1.21 ES Chapter 21 – Cumulative, in-combination and transboundary effects.</b> Moreover, <b>6.1.22 ES Chapter 22 – Conclusion and mitigation commitments</b> provides an overview of the comprehensive mitigation commitments identified to address the anticipated negative effects.</p> <p>As demonstrated in the comprehensive suite of DCO application documents, the London Resort is expected to have a large number of positive impacts. The paragraph must therefore make it clear that while there will be some limited negative impacts the London Resort is expected to generate</p>		<p><u>upon the opportunities presented by the delivery of the London Resort.”</u></p>



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					<p>significant <i>positive</i> impacts that significantly outweigh the negative impacts in the public interest.</p> <p>The second point to note is with regards to the reference “<i>should they proceed</i>”. LRCH is committed to ensuring the delivery of the London Resort as soon as possible after development consent is obtained, expected in summer 2022.</p> <p>In failing to recognise the London Resort, LRCH believe the DLP has not been positively prepared, is not justified and is not consistent with national policy.</p>		
94	4.27	No comment	No comment	No comment	It is important to note the London Resort proposes significant investment to enable the London Resort to be serviced by Fastrack for use by	6.2.9.1 ES Appendix 9.1 Appendix TA-U Rail Strategy Plan (23 of 33)	N/A

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					<p>visitors and staff. Please refer to <b>6.2.9.1 ES Appendix 9.1 Appendix TA-V Bus Strategy Plan (24 of 33)</b>.</p> <p>As noted elsewhere, the London Resort supports improvements to Swanscombe Station, however its own transport strategy is not dependent of the delivery of such. Please refer to <b>6.2.9.1 ES Appendix 9.1 Appendix TA-U Rail Strategy Plan (23 of 33)</b>.</p>	6.2.9.1 ES Appendix 9.1 Appendix TA-V Bus Strategy Plan (24 of 33)	
94	4.29	No comment	No comment	No comment	<p>Paragraph 4.29 seeks to promote opportunities to access a high quality public transport network, recognising the potential of Ebbsfleet International Station and Fastrack. It also seeks improvements to pedestrian and cycle facilities.</p> <p>In this regard, the delivery of the London Resort is complementary as its</p>	6.1.9 ES Chapter 9 – Land transport  6.1.10 ES Chapter 10 – River transport	N/A

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					proposals seek to create bus, walking and cycling routes. These are explored through <b>6.1.9 ES Chapter 9 – Land transport, 6.1.10 ES Chapter 10 – River transport</b> and their supporting appendices.		
94	Policy E3: Swanscombe	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	LRCH find much to support within Policy E3 which encourages the strengthening of the role of Swanscombe.  Although not within the Ebbsfleet Garden City 'core', the London Resort will also assist in the delivery of this policy. The London Resort will facilitate and act as a step change in the delivery of improvements to public transport locally. While the London Resort does not require the delivery of upgrades to Swanscombe station for its own transport strategy, it is in	N/A	Add to Policy E3:  <u>"4. Swanscombe will look to maximise opportunities and positive impacts presented by its unique location as the closest settlement to the London Resort."</u>

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					<p>active support of infrastructure improvements undergoing feasibility works by Network Rail and other delivery partners. The London Resort is looking to deliver substantial improvements to walking and cycling. These will include upgrades to Pilgrims' Way which will improve access through Swanscombe Peninsula and to the River Thames, as promoted by the policy.</p> <p>While LRCH support the general thrust of Policy E3 (and believe the London Resort would be in compliance with the policies), it is currently silent on the delivery and opportunities that exist to capture the benefits and positive impacts for Swanscombe expected to arise through the delivery of the London Resort,</p>		

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					<p>especially with regards to employment opportunities, supply chain opportunities, visitor stay and accommodation.</p> <p>LRCH believe the London Resort should be explicitly identified within Policy E3, and without such would fail to represent a plan that has been positively prepared.</p>		
96	4.35	No comment	<p>P - ✕</p> <p>J - ✕</p> <p>E - ?</p> <p>C - ✕</p>	No comment	<p>The London Resort proposals have had full regard to the presence of the Baker's Hole Site of Special Scientific Interest (SSSI) and Scheduled Monument.</p> <p>LRCH has carefully developed the route and design of the London Resort Access Road and People Mover in association with engagement with a number of statutory consultees, including Historic England, Natural</p>	<p>6.1.14 ES Chapter 14 – Cultural heritage and archaeology</p> <p>6.1.18 ES Chapter 18 – Soils, hydrogeology and ground conditions</p>	<p>Amend Paragraph 4.35 as follows:</p> <p><i>“The site includes a major urban park in the north/ west. This should be laid out and managed consistent with the requirements of the Bakers Hole Site of Special Scientific Interest and Scheduled Monuments which reflect the geological interest from the Palaeolithic period. This part of the site, occupying a prominent and strategically sensitive position adjacent to Swanscombe, also includes</i></p>

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					<p>England, Environment Agency, High Speed 1 and Kent County Council. Please refer to <b>6.1.14 ES Chapter 14 – Cultural heritage and archaeology</b> and <b>6.1.18 ES Chapter 18 – Soils, hydrogeology and ground conditions</b> and associated appendices</p> <p>Therefore, while LRCH has no objection to the thrust of the comments that the area surrounding the Baker's Hole SSSI will form Strategic Open Space it must ensure sufficient flexibility to accommodate the London Resort's Access Road and People Mover route, and flexibility should the routes and alignments of such be required to change.</p> <p>Without this required change, LRCH consider that the RPSDLP would fail to represent a plan</p>		<p><i>land that was previously used for landfill and may be subject to contamination. It will form part of the strategic open space provision, rather than built development will be limited to the provision of the London Resort Access Road and People Mover routes through to Swanscombe Peninsula, the routes of which will be safeguarded. To the east, the River Ebbsfleet and surrounding marsh, scrub and grassy areas is a Local Wildlife Site. It is important that any future development reflects these important historic and natural features, and successful integration to the built, natural and heritage environment."</i></p>

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					that has been positively prepared.		
96	4.38	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	<p>Paragraph 4.38 comments on the important role and function played by Ebbsfleet International Station in shaping development in the location. The presence of the station, and transport accessibility more broadly, was a key factor in the site selection process for the London Resort. This is discussed in <b>6.1.4 ES Chapter 4 – Project development and alternatives</b>.</p> <p>LRCH believe the delivery of the London Resort will deliver investment in to Ebbsfleet International Station, including station concourse upgrades, which will help secure its role and function. Moreover, it will enable Ebbsfleet International</p>	6.1.4 ES Chapter 4 – Project development and alternatives	Amend paragraph 4.38 to ensure the value of the London Resort in assisting in securing a role of Ebbsfleet International Station and Ebbsfleet Central is recognised.

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					<p>Station to act as a transport interchange for the London Resort, pulling together accessibility by a number of modes of travel. By association it will facilitate confidence and investment to realise wider developments at Ebbsfleet Central, including Ebbsfleet Development Corporation's own Ebbsfleet Central masterplan.</p> <p>The London Resort does not prejudice the delivery of the Elizabeth Line from Abbey Wood to Ebbsfleet International Station. LRCH recently responded to a consultation by C2E Partnership actively supporting the lobbying efforts to secure public funding for such an extension.</p> <p>Owing to the significant role the London Resort</p>		



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					can play in the delivery and enhancement of proposals in and around Ebbsfleet International Station, LRCH believe the London Resort should be explicitly identified and without such would fail to represent a plan that has been positively prepared.		
98	Policy E4: Ebbsfleet Central Allocation	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	LRCH believes the delivery of the London Resort will accelerate the delivery of Ebbsfleet Central by acting as a stimulus for regeneration and development in the location.  Policy E4 should make explicit reference to identify and safeguard the routes of the London Resort Access Road and People Mover. Please refer to <b>6.2.9.1 ES Appendix 9.1 Appendix TA-I People Mover Options Appraisal (11 of 33), 6.2.9.1 ES Appendix</b>	6.2.9.1 ES Appendix 9.1 Appendix TA-I People Mover Options Appraisal (11 of 33)  6.2.9.1 ES Appendix 9.1 Appendix TA-J Access Note (12 of 33)  6.2.9.1 ES Appendix 9.1 Appendix TA-K Highway Works - General Arrangement	Add to part 2 of Policy E4:  <u>"i) Safeguard the routes and delivery of:</u>  (i) <u>the London Resort's Access Road from the A2(T) through Ebbsfleet Central and to the Swanscombe Peninsula</u>  (ii) <u>the London Resort's People Mover route from Ebbsfleet Central to Swanscombe Peninsula"</u>

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					<b>9.1 Appendix TA-J Access Note (12 of 33) and 6.2.9.1 ES Appendix 9.1 Appendix TA-K Highway Works - General Arrangement Drawings (13 of 33).</b>	Drawings (13 of 33)	
93	4.46	No comment	No comment	No comment	<p>Paragraph 4.46 provides supporting text to the representation provided through Diagram 13 and Policy E6. The paragraph recognises that it “<i>broadly covers potential brownfield development land between the High Speed 1 railway cutting in the east and the Croxton and Garry residential site near Greenhithe to the west (Diagram 13).</i>”</p> <p>A detailed assessment of the Swanscombe Peninsula is set out within the DCO application documents. The nature of the land uses and ground conditions were relevant in the site selection</p>	6.1.4 Project development and alternatives	N/A

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					process identified through <b>6.1.4 Project development and alternatives</b> and the London Resort is considered a use which can suitably take place on such heavily contaminated brownfield land. For this reason, the London Resort represents a long term regeneration opportunity across the Swanscombe Peninsula.		
103	4.47	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	Paragraph 4.47 provides an underwhelming and unenthusiastic acknowledgement of the London Resort. It notes:  <i>"It currently comprises a mix of industry and open land on a small part of Swanscombe Peninsula, and forms part of the wider site put forward for the London Resort. In light of the uncertainty over the future of the area, it is appropriate for</i>	7.4 Planning Statement  7.5 Economic and Regeneration Statement	Amend Paragraph 4.47 and other aspects of the RPSDLP to provide stronger recognition and focus towards the delivery of the London Resort. The paragraph should include acknowledgement of its status as being Accepted by PINS in January 2021.

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					<p><i>the Local Plan to provide a policy framework for appropriate development in the event that the proposed London Resort either does not get consent, or it gets consent but is not fully implemented. In the event that it gets consent and applicable development commences, a review of the Local Plan will consider the need to revise plan policies in response to projected impacts."</i></p> <p>While LRCH support the recognition, in common with the wider representations submitted on the RPSDLP, there is a need for the strategy and focus of the DLP to shift towards celebrating and grasping the unique opportunity presented by the London Resort. Please refer to <b>7.4 Planning Statement</b> and</p>		

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					<b>7.5 Economic and Regeneration Statement.</b>		
104	Diagram 13: North of London Road Area, Swanscomb e	No comment	P - ✕ J - ✕ E - ? C - ✕	No comment	LRCH note the revised and more localised geographic extent of the policy area and diagram. LRCH strongly object to Diagram 13 as currently depicted. The diagram fails to take into account the development proposals being progressed in respect of the London Resort. Please refer to <b>2.21 Illustrative Masterplan</b> . The proposals for the London Resort make significant provisions for the enhancement of the marshes across Swanscombe Peninsula.  Without this required change, LRCH consider that the RPSDLP would fail to represent a plan that has been positively prepared.	2.21 Illustrative Masterplan	Amend Diagram 13 as follows:  1) Identify the development extent of the London Resort based upon <i>2.21 Illustrative Masterplan</i> .  2) Update 'Proposed Green Grid' arrows to reflect those promoted within <i>2.21 Illustrative Masterplan</i> .  3) Identify the proposed ferry terminal on Swanscombe Peninsula.  Diagram 13 should also be amended to reflect the comments provided in respect of Diagrams 1, 2, 3 and 10.

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
105	Policy E6: North of London Road Area, Swanscomb e	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	<p>As an overarching principle, LRCH recognise and support the regeneration potential of the land described through Policy E6 (and depicted in Diagram 13).</p> <p>Consistent with the approach taken by LRCH, there is significant net economic dividend to be realised through the redevelopment of this area and the delivery of the London Resort. Please refer to 7.5 Economic and Regeneration Statement.</p> <p>With regards to criteria d) to d) identified within Part 2) of Policy E6, LRCH is broadly in agreement. The proposals for the London Resort is considered to be in accordance with and would satisfy all the criteria, such is the detailed and careful</p>	7.5 Economic and Regeneration Statement	<p>Amend Part 3) to Policy E6 as follows:</p> <p><i><u>“3. <u>Proposals for the delivery of the London Resort, a global entertainment resort, and associated development across the Swanscombe Peninsula will be actively supported and encouraged, subject to detailed assessment against other policies within the plan. In the event that consent is given to the proposed international scale resort and a Local Plan Review is triggered, it will consider the need to revise this and other policies in the Plan in response to projected impacts.”</u></u></i></p>

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					<p>masterplanning exercise that has been undertaken. In this regard, LRCH offers its broad support in principles.</p> <p>However, LRCH strongly object to Part 3) of Policy E6 as currently drafted given a failure to positively plan for the delivery of the London Resort. As currently drafted, Part 3) reads</p> <p><i>“In the event that consent is given to the proposed international scale resort and a Local Plan Review is triggered, it will consider the need to revise this and other policies in the Plan in response to projected impacts.”</i></p> <p>However, without adequately reflecting the London Resort, the policy is not capable of demonstrating it has been</p>		

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					<p>positively prepared. As noted in earlier responses, LRCH is of the strong view that the strategy of the RPSDLP is wrong in that it fails to recognise the London Resort. Policy E6 must be amended to represent the London Resort proposals in their entirety and to reflect a change to the Strategy &amp; Objectives of the RPSDLP noted in earlier comments.</p> <p>Without adequate redrafting of Part 3), LRCH consider that the RPSDLP would fail to represent a plan that has been positively prepared.</p>		
164	Policy M14: Green and Blue Infrastructure and Open Space Provision	No comment	P - ✕ J - ✕ E - ? C - ✕	No comment	Policy M14 notes the approach taken with regards to matters including open space provision. Via the Policies Map, as currently drafted much of the Swanscombe	2.6 Access, Rights of Way and Public Rights of Navigation Plans  2.21 Illustrative Masterplan	N/A



(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					<p>Peninsula is allocated as Borough Open Space.</p> <p>While in isolation LRCH understand the broad approach being taken in respect of Borough Open Space, LRCH strongly object to the allocation of Borough Open Space across the full extent of the Swanscombe Peninsula and consider its boundaries should be more carefully drawn to reflect the development boundaries of the London Resort, as shown on <b>2.21 Illustrative Masterplan</b>.</p> <p>The DCO application includes extensive provision for public access to the marshes across Swanscombe Peninsula which is considered to represent significant improvements to the existing position. Please refer to <b>2.6 Access, Rights of Way and Public Rights of</b></p>	6.2.11.9 ES Appendix 11.9 Public Rights of Way Assessment and Strategy	

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					<p><b>Navigation Plans and 6.2.11.9 ES Appendix 11.9 Public Rights of Way Assessment and Strategy.</b></p> <p>Separate comments are provided in respect of the Policies Map.</p>		
177	Policy M16: Travel Manageme nt	No comment	P - ? J - ? E - ? C - ?	No comment	<p>As mentioned through <b>6.1.4 Project development and alternatives</b>, the site selection process for the London Resort was informed by its excellent transport connections.</p> <p>Appropriate vehicular access is provided via the London Resort Access Road and People Mover etc.</p> <p>The London Resort's transport strategy seeks to deliver a modal split which maximises the use of public transport systems, to include the use of Ebbsfleet</p>	<p>6.1.4 Project development and alternatives</p> <p>6.2.9.1 ES Appendix 9.1 Appendix TA-U Rail Strategy Plan (23 of 33)</p> <p>6.2.9.1 ES Appendix 9.1 Appendix TA-V Bus Strategy Plan (24 of 33)</p> <p>6.2.9.1 ES Appendix 9.1 Appendix TA-W Uber Boats by Thames Clipper Operation</p>	N/A

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					<p>International Station (thus High Speed 1), Fastrack and the use of the River Thames. Please refer to <b>6.2.9.1 ES Appendix 9.1 Appendix TA-U Rail Strategy Plan (23 of 33)</b>, <b>6.2.9.1 ES Appendix 9.1 Appendix TA-V Bus Strategy Plan (24 of 33)</b> and <b>6.2.9.1 ES Appendix 9.1 Appendix TA-W Uber Boats by Thames Clipper Operation Proposal (25 of 33)</b>.</p> <p>Moreover, LRCH has previously publically signalled its support for the delivery of an extension to the Elizabeth Line although it has made clear that its own transport strategy is not contingent upon the delivery of such.</p>	Proposal (25 of 33)	
178	Policy M17: Active Travel,	No comment	P - ? J - ? E - ? C - ?	No comment	The London Resort's transport strategy seeks to encourage active travel.	N/A	N/A

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
	Access and Parking						
175	Figure 12: Identified Employment Areas	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	LRCH is cognisant of the existing employment areas within its DCO Order Limit and which would be displaced as a result of the delivery of the London Resort. However, the significant economic and employment benefits that can be realised through the delivery of the London Resort are expected to significantly outweigh the economic contribution of existing employment areas. Please refer to <b>4.1 Statement of Reasons, 7.4 Planning Statement and 7.5 Economic and Regeneration Statement.</b>  The context of the London Resort must therefore be considered in the continued allocation of Manor Way, London	4.1 Statement of Reasons  7.4 Planning Statement  7.5 Economic and Regeneration Statement.	N/A

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					Road and Galley Hill as Identified Employment Areas.		
193	Policy M21: Identified Employment Areas	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	<p>Policy M21 relates to Identified Employment Areas and their promotion for economic activity. Part 4 considers other proposed land uses within Identified Employment Sites but relates only to the delivery of hotels. Given the comments on the RPSDLP provided elsewhere LRCH consider it is prudent to explicitly identify the delivery of comprehensive regeneration projects (of which the London Resort would be one) as an additional criteria as justifying the loss or alternative developments within Identified Employment Areas.</p> <p>The London Resort would generate substantial</p>	<p>7.4 Planning Statement</p> <p>7.5 Economic and Regeneration Statement.</p>	<p>Amend Policy M21 by adding a second criteria under 'Other proposals at Identified Employment Areas' as follows:</p> <p><u>"5. Where comprehensive regeneration schemes would deliver significant net gain in employment opportunities and/or economic activity."</u></p>

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					<p>economic activity on implementation of the development to which significant weight must be attributed. While the proposals will result in the displacement of existing businesses and employment, principally within the areas surrounding Manor Way, London Road and Galley Hill, the London Resort is anticipated to create a very significant net gain in employment opportunities. Please refer to <b>7.4 Planning Statement</b> and <b>7.5 Economic and Regeneration Statement</b>.</p> <p>The context of the London Resort must therefore be considered in the continued allocation of Manor Way, London Road and Galley Hill as Identified Employment Areas.</p>		

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound						
207	Table 10: Infrastructur e Aims and Potential Main Projects	No comment	P - ✖ J - ✖ E - ? C - ✖	No comment	Table 10 identifies infrastructure aims and potential main projects. Consistent with the thrust of comments made by LRCH, it is disappointing the London Resort and its associated infrastructure (London Resort Access Road, People Mover etc.) are not identified.  On this point, LRCH notes an inconsistent approach taken between the London Resort and the Lower Thames Crossing. The LTC is referenced as a 'Potential Main Project' in Table 10, yet is not as progressed as the London Resort in terms of its route to securing development consent having submitted but subsequently withdrawn its DCO application in November 2020 before a decision on acceptance was made. It is not clear to LRCH why	N/A	Amend Table 10 by inserting additional row as follows: <table><tr><td><b><i>Infrastruct ure provision</i></b></td><td><b><i>Potential main projects</i></b></td></tr><tr><td>...</td><td>...</td></tr><tr><td><u>8. Global entertainme nt resort and associated developme nt</u></td><td><u>The London Resort, Swans combe Penin sula</u></td></tr></table>	<b><i>Infrastruct ure provision</i></b>	<b><i>Potential main projects</i></b>	...	...	<u>8. Global entertainme nt resort and associated developme nt</u>	<u>The London Resort, Swans combe Penin sula</u>
<b><i>Infrastruct ure provision</i></b>	<b><i>Potential main projects</i></b>												
...	...												
<u>8. Global entertainme nt resort and associated developme nt</u>	<u>The London Resort, Swans combe Penin sula</u>												

(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					LTC is recognised whereas the London Resort is not.		
208	Table 11: Triggers for Local Plan Review and Reporting Dates	No comment	P - ✕ J - ✕ E - ? C - ✕	No comment	<p>On the basis of comments provided elsewhere, LRCH strongly object to the implications of Table 11. LRCH is of the strong view that the strategy of the RPSDLP is wrong in that it fails to recognise the London Resort. The implication therefore is that the DLP must plan for the London Resort from the outset and not as part of a Local Plan Review.</p> <p>By including a provision that the DLP would require review in light of the London Resort being implemented/delivered, it is a recognition by DBC that the effects of the London Resort as significant and far reaching. LRCH agree,</p>	N/A	Amend the RPSDLP in line with all the above comments to ensure that the London Resort is integrated into the strategy, objectives and detail of the DLP from the outset. This requires a wholesale re-write of the RPSDLP.



(a) Page(s)	(b) Paragraph / Policy / Policies Map	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co- operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
					which justifies the position that it should be considered now in the plan preparation stage rather than as part of a review. Paragraph 16b) of the NPPF requires development plan documents to “ <i>be prepared positively, in a way that is aspirational but deliverable.</i> ” As a result, LRCH strongly believe the opposite approach should be taken with the London Resort fully integrated into the strategy, objectives and finer detail of the DLP.		

**Table A6.2: LRCH's detailed comments to the Revised Pre-Submission Dartford Local Plan to 2037 (Publication) Policies Map Changes (September 2021)**

(a) Page(s)	(b) Section / Paragraph / Policy	(c) Legally compliant	(d) Sound	(e) Complies with the duty to co-operate	(f) LRCH comments	(g) Supporting evidence base	(h) Modifications necessary for the RPSDLP to be found legally compliant and sound
13	Flood Zones Inset – North East	No comment	No comment	No comment	LRCH has commissioned a comprehensive Flood Risk Assessment in support of its DCO application. Please refer to <b>6.2.17.1 ES Appendix 17.1 Flood Risk Assessment.</b>	6.2.17.1 ES Appendix 17.1 Flood Risk Assessment	N/A
15	Marine Conservation Zone	No comment	No comment	No comment	LRCH is aware of the presence of the existing Marine Conservation Zone. Please refer to <b>6.1.13 ES Chapter 13 – Marine ecology and biodiversity</b> and <b>6.2.13.8 ES Appendix 13.8 Marine Conservation Zone Assessment.</b>	6.1.13 ES Chapter 13 – Marine ecology and biodiversity 6.2.13.8 ES Appendix 13.8 Marine Conservation Zone Assessment	N/A
25	Site of Special Scientific Interest, Bakers Hole – now	No comment	P - ✕ J - ✕ E - ? C - ✕	No comment	LRCH is aware of matters surrounding the designation of the Swanscombe Peninsula Site of Special Scientific Interest.	N/A	N/A

	renamed to Swanscomb e Peninsula						
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**Appendix 7**  
**Supporting evidence base**

## Supporting evidence base

Table A7.1 below identifies the documents (referenced in column (g) in **Appendix 6**) that should be read in full as the evidence base and context for the detailed comments submitted by LRCH. A link to download each document from the PINS Examination Library is provided in the table while the documents are also enclosed with these representations.

**Table A7.1: Supporting evidence base**

Document reference	PINS Examination Library
2.6 Access, Rights of Way and Public Rights of Navigation Plans	<a href="#">Link</a>
2.20 Illustrative Landscape Plans	<a href="#">Link</a>
2.21 Illustrative Masterplan	<a href="#">Link</a>
4.1 Statement of Reasons	<a href="#">Link</a>
5.1 Consultation Report (1 of 14)	<a href="#">Link</a>
6.1.4 ES Chapter 4 – Project development and alternatives	<a href="#">Link</a>
6.1.9 ES Chapter 9 – Land transport	<a href="#">Link</a>
6.1.10 ES Chapter 10 – River transport	<a href="#">Link</a>
6.1.11 ES Chapter 11 – Landscape and visual effects	<a href="#">Link</a>
6.1.12 ES Chapter 12 – Terrestrial and freshwater ecology and biodiversity	<a href="#">Link</a>
6.1.14 ES Chapter 14 – Cultural heritage and archaeology	<a href="#">Link</a>
6.1.18 ES Chapter 18 – Soils, hydrogeology and ground conditions	<a href="#">Link</a>

6.1.21 ES Chapter 21 – Cumulative, in-combination and transboundary effects	<a href="#">Link</a>
6.1.22 ES Chapter 22 – Conclusion and mitigation commitments	<a href="#">Link</a>
6.2.7.7 ES Appendix 7.7 Outline Employment and Skills Strategy	<a href="#">Link</a>
6.2.9.1 ES Appendix 9.1 Appendix TA-I People Mover Options Appraisal (11 of 33)	<a href="#">Link</a>
6.2.9.1 ES Appendix 9.1 Appendix TA-J Access Note (12 of 33)	<a href="#">Link</a>
6.2.9.1 ES Appendix 9.1 Appendix TA-K Highway Works - General Arrangement Drawings (13 of 33)	<a href="#">Link</a>
6.2.9.1 ES Appendix 9.1 Appendix TA-U Rail Strategy Plan (23 of 33)	<a href="#">Link</a>
6.2.9.1 ES Appendix 9.1 Appendix TA-V Bus Strategy Plan (24 of 33)	<a href="#">Link</a>
6.2.9.1 ES Appendix 9.1 Appendix TA-W Uber Boats by Thames Clipper Operation Proposal (25 of 33)	<a href="#">Link</a>
6.2.11.7 ES Appendix 11.7 Landscape Strategy	<a href="#">Link</a>
6.2.11.8 ES Appendix 11.8 Landscape and Ecology Management Plan	<a href="#">Link</a>
6.2.11.9 ES Appendix 11.9 Public Rights of Way Assessment and Strategy	<a href="#">Link</a>
6.2.12.2 ES Appendix 12.2 Biodiversity Net Gain Assessment	<a href="#">Link</a>
6.2.14.1 ES Appendix 14.1 Archaeological Desk-based Assessment, December 2020	<a href="#">Link</a>
6.2.14.2 ES Appendix 14.2 Built Heritage Statement, December 2020	<a href="#">Link</a>
6.2.14.3 ES Appendix 14.3 Historic Landscape Characterisation, October 2020	<a href="#">Link</a>
6.2.14.4 ES Appendix 14.4 Desk-based Assessment and Statement of Archaeological Significance (Palaeolithic) for main access road (eastern route) and people-mover train / cycle route options, July 2017	<a href="#">Link</a>

6.2.14.5 ES Appendix 14.5 Technical Note 1. People Mover Route. Alignment Options Appraisal, 2020	<a href="#">Link</a>
6.2.14.8 ES Appendix 14.8 Land north of Springhead Nursery, Archaeological Evaluation Report, 2017	<a href="#">Link</a>
6.2.14.9 ES Appendix 14.9 Historic Environment Framework, December 2020	<a href="#">Link</a>
6.2.14.10 ES Appendix 14.10 Summary of Impacts, Mitigation and Residual Effects	<a href="#">Link</a>
7.4 Planning Statement	<a href="#">Link</a>
7.5 Economic and Regeneration Statement	<a href="#">Link</a>