

## **Comments on the LRCH Environmental Scoping Report**

In 2020, the long talked of vast theme park development on Swanscombe Marshes gathered new speed. Over the period of the lockdown, a huge amount of work took place, with London Resort Company Holdings meeting what has been described as an “ambitious” timetable. With 18m visitors a year (against around 4m at Alton Towers), various consultees compare it with the size of EuroDisney. Swanscombe, Northfleet and the surrounding towns and villages are small, local areas, and their residents will be directly affected by the development. With an online consultation and lockdown limiting environmental surveys, it is important that this development receives the required level of scrutiny to ensure that it is right for the area.

The initial environmental scoping report drew considerable comments from statutory consultees, and comments from the Planning Inspectorate. A number of consultees raised concerns about a “lack of clarity” in certain areas, including why certain issues were to be scoped out – many of which the Planning Inspectorate did not agree could be scoped out. There were also issues around the timing of when baseline data on biodiversity would be taken; about the use of air quality statistics that Highways England believe to be out of date; and a lack of appreciation of the importance of a nearby SSSI and Local Wildlife Sites, as well as the Marine Conservation Zone on which the development encroaches.

More recently, a meeting note shows that whilst LRCH are aware of discussions around the marshes being declared an SSSI, they have chosen to plough ahead and submit their planning application. This disregard for the biodiversity of the area is disappointing. Further, there has been only the briefest consideration of alternative sites in and around London, with a fixation on using the marshland site proposed.

The importance of the environmental impact assessment is highlighted by Natural England, who note both case law and guidance:

- Harrison, J in R. v. Cornwall County Council ex parte Hardy (2001)
- Note on Environmental Impact Assessment Directive for Local Planning Authorities Office of the Deputy Prime Minister (April 2004)

This document highlights some of the concerns raised around the initial scoping report, and puts these in a local context.

### **Impact on transport**

Of great concern to the local community is the impact of c50,000 visitors a day coming through local roads, rail and river services. Mitigating impact is a river link via Tilbury – but this only accounts for 15% of the expected visitors. Whilst they had hoped to scope out the impact on rail networks, the Planning Inspectorate did not agree this.

**Road:** The main focus of the scoping report has been on the A2, rather than on the local road network, which is extensively used by local residents to access key amenities. The A2260 is often very busy in its own right, especially used by commuters seeking to avoid jams on the A2, as a back route to the M25, and to access Bluewater. With 7,750 car parking spaces being built in a large multi-storey car park, it must be assumed that LRCH are anticipating very large numbers of cars on the road.

**Rail:** the suggestion is that visitors will be signposted to catch a train to Greenhithe (not, in itself, a large station) and then take a bus. Consultees point out that Swanscombe and Northfleet are

nearer, and the impact on the services, stations and nearby areas need to be taken into account, for both visitors and staff.

**River:** 15% of visitors are expected to arrive via a new passenger ferry from Tilbury to the resort.

### **Air quality**

The impact of air quality changes must not be underestimated. As a largely residential area, with growing plans for more homes in Northfleet as part of the Ebbsfleet Garden City developments, the impact on human health should not be overlooked.

It is particularly noted that the NO<sub>2</sub> data for Gravesham is based on information that Highways England have (in 2020) identified is out of date.

The information only takes into account the A2, and it is not clear to what extent additional surveys are planned to understand the impact of the pollution both from the site itself, the power plant, and the additional considerable traffic to the local roads will bring. In addition, there is the pollution from the ferries, and potential use of a helipad.

The scoping report did not give much detail on the contribution of the site to greenhouse gases and climate change, which was identified as required.

The EDC give considerable comments on the air quality section of the report including the relevant regulations:

Chapter 15 Air Quality	
Para. Nos.	Comments
15.9	Need to consider LA105 in DMRB as that provided the guidance in relation to the assessment of whether the scheme impacts on compliance with the EU Directive which is required when considering the NN NPS and particularly para 5.12 and 5.13.
15.15	Evidence is required in relation to supporting the decision as to why additional monitoring is not required should be included in the ES. Highways England has also undertaken monitoring which should be utilised as part of the assessment, if agreed with HE.
Operational Phase - Receptors	Receptors for the purpose of determining compliance with EU Limit values should be considered, which include public access such as footpaths where there are Defra PCM Links (see LA105 for Approach). If modelled exceedances of AQS Objectives are assessed (regardless of whether they coincide with a Defra PCM link), Defra should be consulted to determine whether it is a matter of compliance.
	It is unclear what criteria will be used to determine the extent of the study area used in the assessment, i.e. will it be based on the indicative criteria in the IAQM guidance?

	It is unclear how the assessment will reflect the proposed phased opening of the scheme and how this also relates to traffic scenarios.
15.33 - Significance of impacts on designated sites	Significance of impact on designated sites from road traffic should consider the guidance in LA105.
15.39 - Operational Phase uncertainty	It is not sufficient to just rely on the Defra projections particularly if the evidence in the area from monitoring trends suggests that relying on the Defra projections could lead to over optimistic predictions. Consider uplifting the modelled concentrations to account for uncertainty which is current practice in the assessment of impacts from changes in road traffic as a result of road schemes.

## **Archaeology, heritage and landscapes**

The main concern, although there are others, is the proposed access road which will run from the A2 to the site, on the south side of Ebbsfleet International Station. This road will go straight through the Baker's Hole SSSI, which has nationally important archaeology within it. Planned mitigations are suggested, but bodies including Historic England and Natural England remain concerned.

It is noted that the site will be 60m high at its highest (higher than the Queen Elizabeth II Bridge at Dartford, which is 58m high), with a 40m chimney for the Combined Heat and Power plant. The development would be visible from the Kent Downs AONB due to its height and scale.

The LRCH describe it as a brownfield site, and suggest that its main features are power lines and electricity pylons. However, local residents know that the main features are the sweeping reeds, wildflowers and water filled marsh habitats, bounded by a chalk ridge and trees.

## **Biodiversity and wildlife**

Only three out of 11 Local Wildlife Sites within 2km of the site were considered in the scoping report. Botany Marshes is a Kent Wildlife Trust nature reserve, and is within the land that LRCH wish to “landscape”, together with other marshland and Broadness Salt Marsh. Responses highlight that there is a disconnect between providing for wildlife and providing landscaped public spaces.

With the development on the banks of the Thames, there are concerns about fish and other marine species which breed in this area, and make use of the salt marshes. Given the plan to build a jetty and run a passenger ferry, this is key to the development. The development encroaches on the Swanscombe Marine Conservation Zone, which was approved by DEFRA in 2019. This exists to protect the rare tentacled lagoon worm, and consultees raise concerns about the impact of the passenger ferry from Tilbury, the dredging to construct the pontoons, and pollution from ferries. There is also concern whether the development is considering the Eel Regulations 2009.

Within the Marshes, there is general lack of clarity about what surveys are being undertaken when, but there is a suggestion to take baseline data in the future. There appears to be some concern about this proposal. There is also a lack of certainty whether all species are being surveyed for, how areas are being selected. It is known for example that Great Crested Newts have previously been found on the site, but are not listed within the surveys to be conducted. Dartford Borough Council highlight that ecology surveys should be in line with British Standard Biodiversity – Code of practice for planning and development (BS 42020:2013).

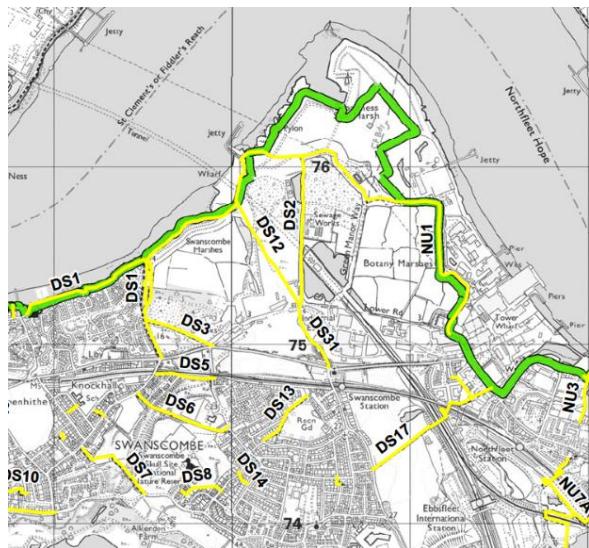
Whilst again, this is referred to as a brownfield site, Natural England explain that “Paragraphs 117 and 118 of the NPPF (and the associated footnotes) provide confirmation that the preferential reuse of brownfield sites should not be promoted ‘where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity’”.

## **Noise and lighting**

The theme park and resort is large, and there will undoubtedly be a huge impact from bright lights, fireworks, lasers and other proposed forms of lighting. Consultees have highlighted that in addition to human noise – such as cheering and screaming – the rides, the Combined Heat and Power Plant, and other machinery noises are likely to be considerable. There is also a mention of a helipad, bringing further noise to the area.

In a blow to dark skies, it seems likely that this development will bring considerable night time light pollution, adding to the haze over the area from deeper within Kent.

## **Public access**



Currently the site is much used by locals, walkers, dog walkers, cyclists and families. Footpaths criss-cross the site (yellow in the map to the left), and the new National Trail route (green) goes across the site.

Loss of these routes is a concern, as well as the freedom to walk through the tracks created over many years by local residents using the marsh as a public amenity and green space.

## **Conclusion**

This is only a summary of some key points. Key concerns for residents are likely to include:

- Impact on roads and rail, increasing difficulties moving around the area
- Increased pollution resulting from traffic and the site itself
- A daily influx people in a small residential community, together with issues for crime and wellbeing
- A loss of the industrial spaces within the proposed development, meaning lost jobs

Regulatory issues are likely to include:

- The strength of the environmental statement
- Air quality concerns and whether the data used and modelling is right
- Biodiversity concerns and surveys meeting requirements
- The impact of the SSSI.

Next steps are likely to include looking at the planning application that was announced in the press on 31<sup>st</sup> December 2020, to identify how they have dealt with some of these concerns.

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