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Dear Sir/Madam,

**London Resort – application by London Resort Company Holdings
for Order granting Development Consent – BC080001**

The applicant's approach to sustainable transport and minimising impacts on the road network, as set out in their 'refined transport strategy', is not one which Raifuture can yet support. "*Network Rail's May 2018 South East Route: Kent Area Route Study - Advice for funders*" document specifically identified Ebbsfleet Southern Link at paragraphs 6.13.24-27: "*Provide a new connection between Swanley and Ebbsfleet International to support predicted passenger uplift demands due to the proposed Ebbsfleet Garden City and London Resort Theme Park developments*" albeit that the Prioritisation Assessment three years ago was "*Should be considered as a longer term aspiration linked to future housing growth and London Resort Theme Park*" (our underlines). Options are detailed in the Accompanying Technical Appendix, paragraphs 10.1-10.5. Now that Network Rail have embarked on a North and East Kent Connectivity CMSP Study it is our view, given the inevitably long lead times for rail projects of this nature to come to fruition, that London Resort Company Holdings should commit to close collaboration with Network Rail and others and to use of 'best endeavours' to ensure that such a new connection is brought into use as soon as is reasonably practicable.

We are also aware of a proposal for a cross-river light rail link; such a link is to us essential to the "*approach to sustainable transport and minimising impacts on the road network.*"

Over 20 years into the 21st Century it cannot possibly be judged right in any policy context that a major development is still proposing thousands of new car park spaces. The same challenge as faced London 2012 repeats itself here. If London 2012 could present itself as the public transport Games, then this development must set itself the same target, to present itself as the public transport Resort.

Raifuture does not support the applicant's approach to keeping London Resort traffic separate from local traffic. A 'public transport Resort' would not need to accommodate so much additional traffic onto an already crowded road network.

Raifuture does not support the applicant's approach to sustainability. Unless and until the transport plans are primarily public transport-led, there can in our view be no justified claim to be sustainable in any meaningful sense.

www.raifuture.org.uk www.raifuturescotland.org.uk www.raifuturewales.org.uk
www.railwatch.org.uk



Railfuture does not consider that the applicant's revised proposals have been adapted to maximise benefits and minimise adverse impacts for the local community and environment, and on balance believes that the London Resort's benefits to the local area in the longer term will be outweighed by creating more problems. The approach to transport for visitors requires a major re-think and an alternative approach.

In respect of the revised emerging Masterplan's proposed mix of facilities and amenities, along with its environmental and transport strategy, Railfuture has fundamental misgivings about the currently-proposed transport strategy. Whatever the mix of facilities and amenities, the means of access to them is in our view the litmus test. For Railfuture the over-riding principle is that London Resort should emulate the best of, and apply lessons learned from, London 2012.

Yours faithfully,

Roger Blake BA, MRTPI (Rtd), MTPS
Railfuture
Vice-Chair, London & South East regional branch
Director for Infrastructure & Networks, national Board