

Luddesdown Parish Council

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Mr A. J.H. Holloway MP, PPS

The House of Commons

Via Email

Re: The London Resort Consultation

Dear Adam

I hope you are well and avoiding Covid 19 successfully.

We responded to the London Resort consultation and would like to copy you on our comments (please see attached). As you will note from these, we found the PEIR anything but easy to understand and lacking in detail in almost all respects. This project has rushed from obtaining a second scoping opinion from PINS to statutory consultation against advice that they needed to do more preparation. They propose to use the 'Rochdale Envelope' approach to effectively obtain an outline planning consent for the development area.

Our concerns over this project lie mostly in the distinct possibility that this project will fail or that LRCH are using the NSIP process to obtain land via CPO that will then be sold. Reading the PINS website, they have apparently been asked to rule if selling the land post DCO is possible (and have ruled that it is). There is nothing in the submission for statutory consultation that makes us believe LRCH is a competent company to deliver this project (quite the reverse). And although there are many 'world leading' aspirations in the guide to consultation; the directors of LRCH will not be accountable for any of them should the land be sold.

We are writing to you because the situation where a shell company can use the Planning Act in this way is very damaging to the local environment and local jobs. If there were a realistic possibility of creating 30,000 jobs, obviously we would be supportive, but if the government are to grant these enormous powers to a company for that purpose; should they not first ensure the accountability and capability to deliver them? The appointment of companies who may obtain NSIP status is at SoS discretion, LRCH were granted the status shortly after Steven Norris joined their board. Given the current intention of the government to take more powers centrally under this Act, could you look at how this process can be made transparent and how companies can be disqualified from holding NSIP status?

I should point out that LRCH is effectively owned (75%) by one person and has been listed for striking off several times since obtaining NSIP status.

Yours sincerely

Noel Clark

(Chair to Luddesdown Parish Council)

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Questions from the 'Statutory Consultation feedback form':-

Q1 With the information available do you support our approach to sustainable transport and minimising impacts on the road network?

It is very difficult from the PEIR to work out what your strategy is. In para 9.12 you set out the worst case scenario as 53,000 persons a day, but the supporting paragraphs do not detail how that number of people could possibly be transported.

The section on public transport (of which you make a great deal) does not appear to provide transportation for more than 2,000 visitors/day far less than the 12,000 people per day (24%) your guide suggests need to arrive by public transport. In PEIR Ch 9.243 you appear to indicate Ebbsfleet International station is operating at its design capacity (i.e. that there is no capacity for your use). In your PEIR Ch 10.56 & 10.57 you appear to indicate 1M passengers a year (2,750/day) could arrive by Thames Clipper, however that would require one every 3 minutes without allowing for tide, weather or closure of the Thames Barrier. You say that the traffic conditions locally will be modelled, but Highways England (in their consultations on the Bean Interchange and Lower Thames Crossing) have repeatedly stated that no modelling has been done on your traffic flows. Clearly your PEIR gives no substance to your strategy.

As local residents, dependent on the use of the A2, which is already at capacity and at a standstill on many occasions; we are concerned that your strategy appears to place a lot more traffic on local roads leading to grid lock in peak times and during exceptional circumstances.

Q2 With the information available, do you support our approach to keeping London Resort traffic separate from local traffic?

LRCH has provided no published plan to achieve this.

The provision of 10,500 parking spaces for 53,000 visitors + service vehicles, 6000 full, 7,100 part time workers per day would lead to gridlock on local approach roads. The statements regarding planning and modelling are not supported by Highways England (who have stated elsewhere that the traffic flows for this project have not been modelled) and the technical notes (TN1-TN4) referred to in your PEIR that detail your plans in this regard have not been issued.

The use of busses is a sensible step, but where do the busses come from? How would people be routed onto them, and how would people travel to the bus departure point? In any event, 250 coaches will only deliver 14,000 people (unless you use very big busses!). Your suggestion of using Fastrack and local bus services as a feeder system is sensible, but what about the parking impact at the pickup points? If you run a free feeder bus from BlueWater – it will just ensure all the parking at Bluewater is over subscribed. The same is true of any local pickups; you create the danger of fly parking in residential areas. Where is your strategy to manage this, as there is no information in your PEIR?

Your guide and PEIR do not make clear your arrangements for the 'ticketing strategy' which is key to control this issue and which has not been published. How will you ensure people don't just turn up (queue on the A2 for a parking space)?

We strongly oppose this on the basis that the strategy as published does not meet the requirements and the effects of it are likely to blight all residents in the area.

Q3 Environment

With the information available, do you support our approach to the environment and biodiversity?

None of the key information (actual impact assessments on wildlife) have been published. The statements you have made on construction phase GHG emissions amount to doing

nothing or TBC. On this basis there is insufficient information to support your approach at this time.. We are therefore opposed to your seeking DCO in that you have no clear plans to protect the environment.

Q4 Sustainability

With the information available, do you support our approach to sustainability?

The guide to consultation makes some bold claims regarding sustainability and low carbon principles, but the PEIR does not support the guide fully on some very important points:-

Since you have stated in your PEIR submission on GHGs that you intend to do nothing about 'embodied carbon' due to the construction phases (paras 20.39+20.40) and on 124,600 tonnes of construction waste you simply state your primary contractor will be responsible (19.106). We are left wondering what your guide means by "*Sustainable and low-carbon principles are integrated across the emerging Masterplan, in terms of design, construction and operation.*"

However there is some consideration for separating operational waste given in the PEIR, and there appears to be a commitment to low carbon energy supply, although this does not go as far as stating you will provide charging points for electric vehicles or mandate EVs for delivery vehicles. Given the weakness of your PEIR policies on transportation, this leads us to have concerns about a high level of vehicular pollution from your site.

As your sustainability policy is at a very early stage of development and has no commitment to reducing environmental impact from construction we cannot support your approach.

Q 5 Walkways, cycle routes, public rights of way?

With the information available, do you support our approach to walkways, cycle routes, and public rights of way?

Apart from the very general statements in the guide, we have found no evidence of what your approach is.

There are 13 paths on the peninsula; what is your plan with regard to each of them? You make statements regarding increasing access and providing cycle routes: are these re-purposing existing rights of way or are you proposing to create new ones?

On the basis that there is no information regarding your plans; we strongly oppose your submission.

Q6 Cultural Heritage

Based on the information available, do you support our approach to cultural heritage?

Your approach to the cultural heritage seems reasonable. However we are not expert on the area and will leave comment on this aspect of your plans to others.

Responded: Neutral

Q7 Communities, regeneration and benefits

Based on the information available, on balance do you think the London Resort will benefit the local area in the longer term or create more problems?

While we are very keen to see regeneration and job creation in the area, our overriding concerns at the lack of detail presented and lack of accountability to these statements following the grant of DCO.

The lack of breakdown of the types of jobs to be created in terms of zero hours contracts or temporary work verses long term stable employment (with a permanent job contract) mean we cannot assess the benefits that may accrue locally. We are also concerned at

the high proportion of roles described as 'seasonal workers' who would necessarily have to come from abroad, given the UK job market's (DHSS rules) current bias against that class of worker.

We also note that LRCH has been unapproachable by the workers and employers currently on the peninsula, failing to agree adequate settlements with them and extending the blight on their places of work and future employment – something your guide and PEIR does not mention, failing either to enumerate the existing employers affected or the number of jobs which will either be lost or those which can be re-located. Given LRCH'S stone walling of the local business community to date; we find the suggestion that you will in future operate to the benefit the local community to be out of character.

We believe the project will therefore create problems for the local communities.

Q 8 Accessibility and inclusivity

Based on the information available, do you agree with our approach to accessibility and inclusivity?

We are not expert on these matters.

Responded: Neutral

Q9 Masterplan

With the information available, what are your thoughts on the emerging masterplan and the mix we are proposing?

The masterplan provides an overview of the absolute maximum heights of the built environment. It does very little else and provides no overview of what the development will look like. It is therefore impossible for us to comment or support it.

10 General

We would like to know what is important to you. Please let us know if you have any further comments on the information presented at this stage.

In reviewing your presentation, we have become increasingly concerned at the lack of detail and evidence of LRCH's capability to deliver this project. Aside from the 'explanatory memorandum' which has clearly been drafted in detail by a properly qualified legal team to maximise your legal benefit from the grant of a DCO; there is little substantial or final information presented at statutory consultation.

From our perspective, the failure of this project, or wilful mis-appropriation of the NSIP processes would be the worst case.

We are deeply concerned that such a large and unique project is seeking to utilise the 'Rochdale Envelope' approach to DCO, 8 years after its inception, when that should have allowed ample time for completion of a fully detailed design to be presented.

Allied to this is the concern that the property may be sold or passed to a third party post DCO, leading to a long term battle to overturn consent for mixed development on sections of the development land in this project which then may be broken up and sold on.

It is also our concern that LRCH has been un-approachable by members of the Peninsula Management Group, whose livelihoods have been blighted by this project and who potentially face CPO or eviction as a result of successful DCO application.

Since there is no recourse to hold LRCH or its directors accountable to aspirations expressed in the PEIR once DCO has been issued and the company has divested itself of the land; we will not support this application.