

Thames Crossing Action Group represents thousands of people who are strongly opposed to the proposed Lower Thames Crossing. We object to the proposed Lower Thames Crossing for many different reasons and do not consider the project to be in any way fit for purpose.

Our response to the London Resort Consultation particularly focused on the aspect of the relationship between the proposed London Resort (LR) and the proposed Lower Thames Crossing. This is because we are aware of some very serious issues that we believe have not been noted or addressed in materials that we have viewed, and we have serious concerns over this.

Inadequacies of London Resort Consultation

We do not feel that adequate and clear information has been provided as part of the London Resort Consultation. Neither do we feel that London Resort have done enough to notify those that would be impacted by their project if it goes ahead.

There was a lot of documentation in the Statutory Consultation, and it is very difficult to try and make sense of, especially with no in-person events to attend due to COVID-19. Also for those North of the river it might be their first real insight into the project, since the parking facility was added, so there is a huge amount of documentation to be faced with.

In particular the way the PEIR has been broken up was very difficult as you have to keep going in and out of different documents to try and find the relevant figures etc. Surely the clear and informative way to lay information out would be to insert relevant figures into the document next to the text that they are relevant to?

The materials are also considerably lacking in relevant info that is needed for people to be able to give meaningful responses to the consultation.

In an email response London Resort sent us dated 17th Sept it stated "*Indeed, the information at consultation reflects the position in early July when the material had to be settled for the consultation preparation and publication so matters of many areas have moved on significantly in the last 2 months or so.*"

We did respond stating that in line with consultation guidelines we would therefore suggest that if significant changes had been made that further consultation is needed, and not just for London Resort to just try and rush straight to DCO stage. Yet that is exactly what they have done! We are also not aware of any consultation report being released to inform of what responses there were, themes, and any feedback that had been taken on board by London Resort, and any changes that may have been made due to responses. The whole point of a consultation is meant to be to get feedback and take it into account. We do not believe that there were no points raised that needed some level of attention and feedback offered to those of us who took part in the consultation, yet no such info has been forthcoming. In fact London Resort's only comments about the consultation seem to be sharing a few brief comments that are all biased in favour of the project.

We also find it questionable that London Resort published a draft DCO when they clearly need to take all consultation responses into account before preparing their DCO application. We pointed out to them that a consultation is not just a tick box exercise that they need to actually read, register, and analyse the responses, this is a legal requirement of the consultation process. To be publishing drafts of their DCO before consultation has ended seems very presumptuous, and does not give the impression that they ever intended to fully read and analyse our responses to the consultation. Nothing has happened since the consultation ended to give any update of how the responses were considered.

We feel much of the information in the consultation materials was out of date. We do not feel that adequate or truly reflective data has been carried out for many aspects. The addition of the Tilbury Parking Facility and the impacts to the north of the river are particularly lacking.

Statements in the PEIR Ch 9 – Transport - *“9.163 A significant change from 2014 scoping is the introduction of a car parking arrangement for the London Resort at the Port of Tilbury, reducing the potential vehicle impacts upon the Dartford Crossing and A2 corridor, areas identified as constrained during the previous consultation period. At this time, the highway impacts of the proposals north of the river are unknown. They will need to be assessed as part of the TA and where necessary, included in the Transport, movement and accessibility chapter of the ES.”* Gave us no confidence at all, and show that adequate data has not been obtained or provided in the consultation materials yet again. How are we meant to be able to respond in a meaningful manner when such info has not been shared? How are we meant to decide whether any mitigation is adequate when the info is not there?

We do not feel that adequate promotion of the consultation has been carried out, again especially to residents and businesses to the north of the river. There are areas that will most definitely be impacted by the proposed scheme, yet they have not been leafleted about the consultation, and this is not acceptable.

In particular if holding a consultation for a project of this scale, during the COVID-19 crisis we feel far more needs to be done to ensure everyone is aware of the consultation and the project plans.

Not only were they not able to offer the regular consultation experience to people, with public events that are usually a standard part of the consultation process. They have also failed to carry out many surveys etc as a direct result of the impact of COVID-19.

We do not feel it adequate to simply continue without the relevant info, and say that they will try to gather the data if possible. Unless procedures can be followed to provide the relevant data, or another form of acceptable and reliable form of data can be sourced then they are not providing the necessary and adequate info to be holding a consultation, and it should be delayed until such time as adequate information and data can be issued as part of the consultation materials, to ensure that everyone has the opportunity to take part in an adequate consultation, which from our experience this hasn't been.

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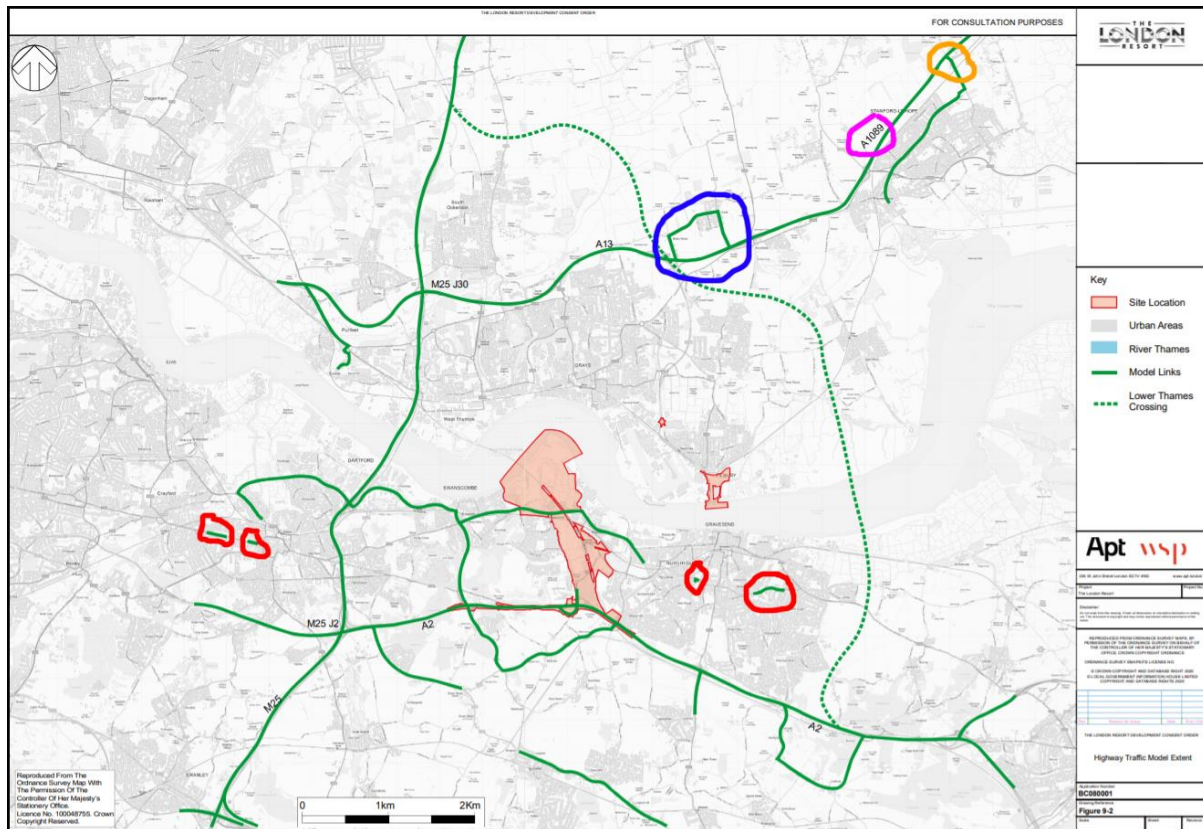
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LR PEIR Fig 9.2 Highway Traffic Model Extent -

<https://marengo.tractivity.co.uk/images/blob/995c3b66-9993-42da-9809-c735eaed278e/LR%20PEIR%20Fig%209.2%20Highway%20Traffic%20Model%20Extent.pdf>

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This document is incorrect as London Resort have the A13 near Stanford-le-Hope labelled as the A1089 (circled in pink on the image above). Considering that the A1089 is the route they are proposing traffic access the proposed parking facility in Tilbury this is very misleading and poor performance from LR to not even be able to identify and label it correctly on a map.

In addition the actual A1089 is not even marked in green on the map, which is supposed to show model links. Again considering traffic will have to use the A1089 to access the parking facility in Tilbury this is unacceptable and very concerning that they have failed to include it.

When we raised this point via email with LR we were told, “*We agree that this link may be used to reach the Tilbury parking facility. We will include this link, along with many others, within the traffic modelling as we progress.*”

There are also routes marked in green that do not make sense as to why they should be included. Some of the green highlighted routes include very small/short isolated sections, which again make no sense. (We have circled the most random ones in red on the image above.)

We particularly enquired via email about the inclusion of Baker St, High Rd, Rectory Rd in Orsett (circled in blue in image above), and were told, “*These links have been included due*

to the potential changes in traffic flows along the A13 which could impact upon local communities within the vicinity.”

Since none of these three roads are directly accessible from the A13 this doesn't provide a clear and informative reply. However, it would suggest that if this is the case that other junctions and roads should also be highlighted, simply by fact that they would need to be used to access these roads alone.

The map used in this document doesn't even clearly show the fact that these roads are not directly connected to the A13.

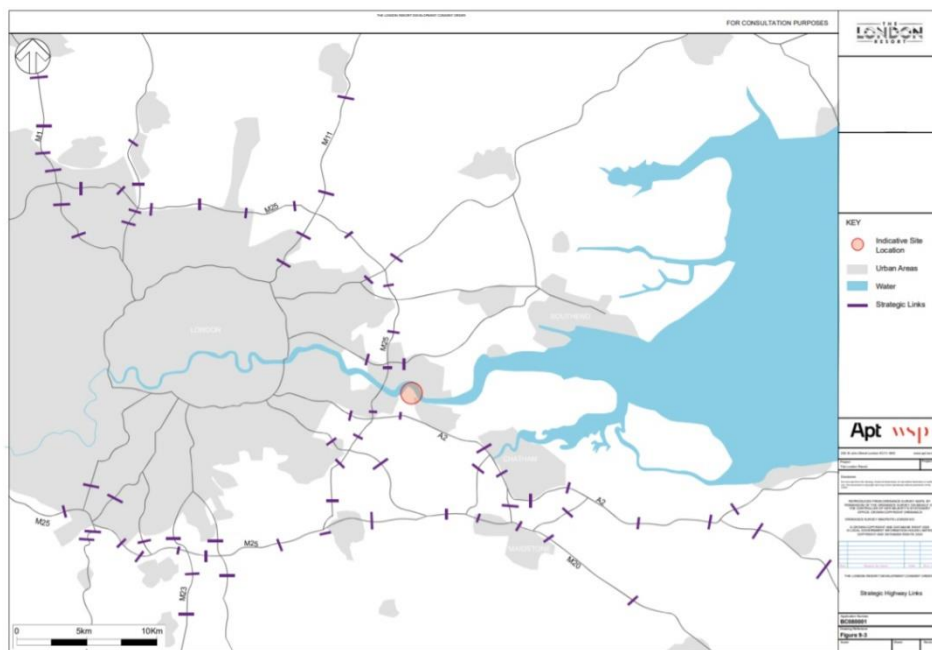
We can in no way understand why LR have highlighted the 'junction' for want of a better word that we have circled in orange. Again this is not a route that is directly accessible from the A13 as their map gives the impression of. It is also a very strange assumption to come to that this route would be impacted, and there is no explanation as to why.

LR are including the proposed Lower Thames Crossing in this map, yet LR are not highlighting the Stanford-le-Hope junction on the A13. Any traffic attempting to use the LTC (or indeed the Orsett Cock junction of the A13, including the A128 traffic) to access the A1089(south) would all have to detour to the Stanford junction to go up and around the traffic lighted roundabout and head back westbound on the A13 to reach the new proposed joint LTC/A1089(south) junction to access the A1089 southbound to the proposed London Resort Parking facility in Tilbury.

All of the above is not satisfactory, certainly isn't clear and informative, and also shows us that there is need for further consultation.

LR PEIR Fig 9.3 Strategic Highway Links -

<https://marengo.tractivity.co.uk/images/blob/56990c15-2b12-4368-af19-7d4fb682e98d/LR%20PEIR%20Fig%209.3%20Strategic%20Highway%20Links.pdf>



The map above is supposed to show strategic links. How can lines marked on a map without any labelling be considered adequate? It is not even clear whether the A1089 is marked on this map or not. Some of the lines intersect routes, but do not show what junction it is, or indeed even the route which it is on, as only a few random roads are actually labelled.

The proposed parking facility to the north of the river in Tilbury is not even marked on the map either.

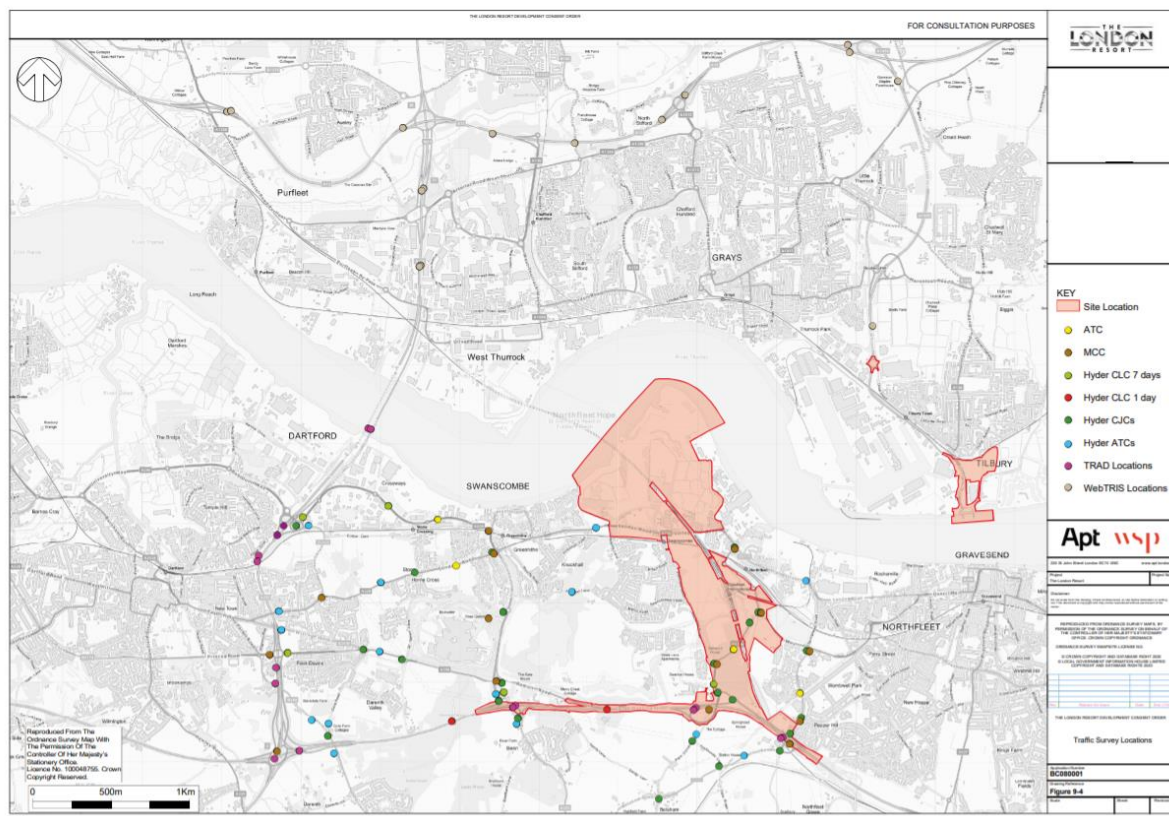
According to 9.113 in the PEIR Ch 9 Transport document -

<https://marengo.tractivity.co.uk/images/blob/c8a0922e-1a04-48f6-972c-312dd515f7c6/LR%20PEIR%20Ch9%20Transport.pdf> "The 'strategic' study area includes strategic links in the wider area that are considered essential for the proposals. These links are shown in Figure 9.3."

Clearly this is not the case as figure 9.3 is an inadequate poorly labelled image which does not provide clear and informative detail that is legally required for an adequate consultation.

LR PEIR Fig 9.4 Traffic Survey Locations -

<https://marengo.tractivity.co.uk/images/blob/ec1a389e-1294-408f-bef7-0a0632b4417f/LR%20PEIR%20Fig%209.4%20Traffic%20Survey%20Locations.pdf> the key on this document only has acronyms and there is no glossary for them. Again this is not clear and informative, as is legally required for an adequate consultation.



Judging by the info provided in the PEIR Ch 9 Transport on this figure, we do not believe the data to be up to date, and we also note the lack of sites and data for north of the river. We yet again consider this to be inadequate info, and certainly not clear or informative.

LR PEIR Fig 9.6 Strategic Highway Network –

<https://marengo.tractivity.co.uk/images/blob/c8fe6c85-1628-4276-9cb4-ce3a16570943/LR%20PEIR%20Fig%209.6%20Strategic%20Highway%20Network.pdf>



The figure above is supposed to show the Strategic Road Network. However LR have glaringly omitted to include the A13 up to the A1089, and the A1089 itself, both of which are part of the Strategic Road Network. Yet another inadequacy of the consultation materials, and proof of lack of clear and informative materials.

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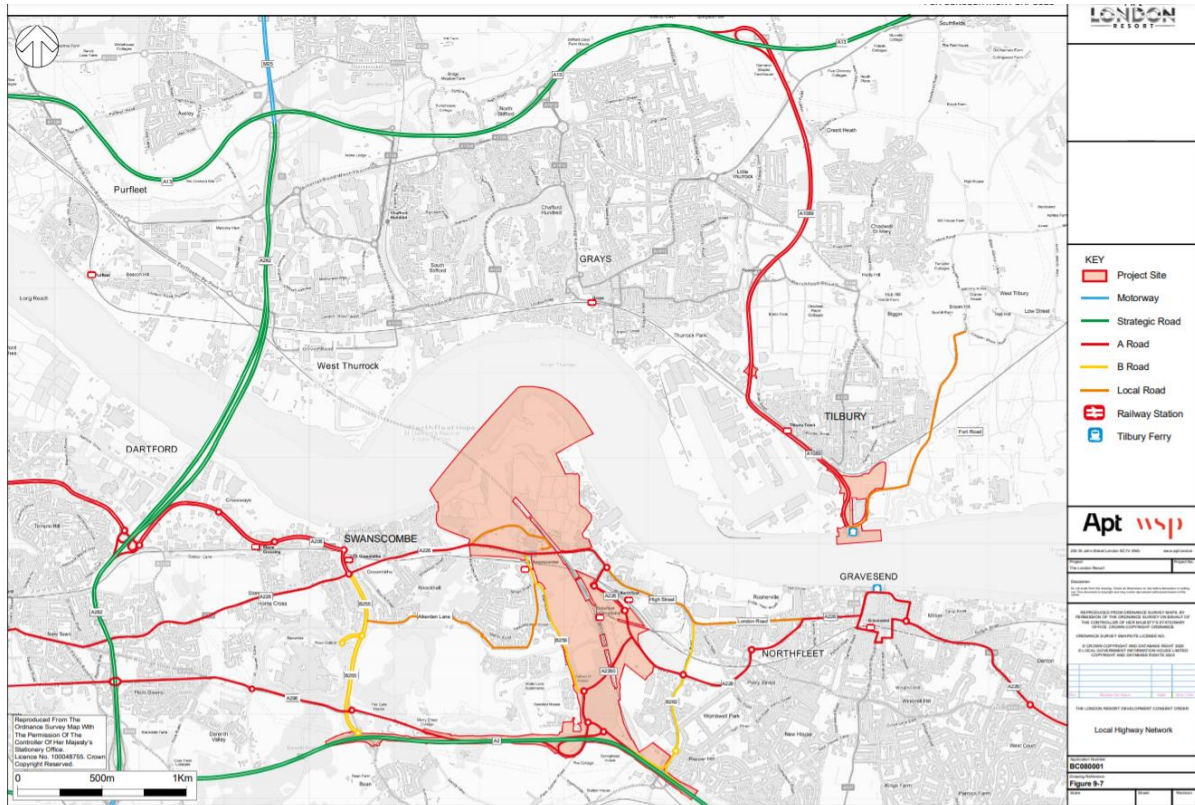
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LR PEIR Fig 9.7 Local Highway Network -

[https://marengo.tractivity.co.uk/images/blob/1979fa02-ca74-4727-ab56-](https://marengo.tractivity.co.uk/images/blob/1979fa02-ca74-4727-ab56-90be0fe4c454/LR%20PEIR%20Fig%209.7%20Local%20Highway%20Network.pdf)

[90be0fe4c454/LR%20PEIR%20Fig%209.7%20Local%20Highway%20Network.pdf](https://marengo.tractivity.co.uk/images/blob/1979fa02-ca74-4727-ab56-90be0fe4c454/LR%20PEIR%20Fig%209.7%20Local%20Highway%20Network.pdf)



The figure above is supposed to show the local road network. However, in this figure LR are showing the A13 up to and past the A1089 as part of the Strategic Road Network, yet they omitted it in the Strategic Highway Network figure 9.6, plus the A13 is only Highways England's up to the A1089 it then becomes part of Thurrock Highways. LR are also still showing the actual A1089 as a local highway, as opposed to strategic highway, when in fact it is part of the Strategic Road Network.

Evidence of the Strategic Road Network can be found at

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/860488/Network_management_08-01-2020.pdf

This just adds to the confusion for those not familiar with the highways network, and clearly shows that LR have no idea, and there isn't even any continuity in their errors across the two figures. How are we meant to have any confidence in their planning when errors like these are so obviously being made?

Errors in email responses to consultation questions

In addition to errors in the consultation materials, on the 2nd August we emailed to ask for details of which existing roads would be impacted by London Resort traffic, and which junction on the A2 traffic would use to access London Resort?

The response we got was, “Access to the Resort will be via the Ebbsfleet Junction with the A2. All traffic to the resort will be signed to use the Southern Road Network (SRN) and not the local network.”

We followed this up asking for clarification of the Southern Road Network (SRN) since we found this confusing considering the acronym SRN usually refers to the Strategic Road Network. The reply we got was “With regards to the SRN, you are correct this should have said Strategic Road Network, not Southern.”

Again more confusing and erroneous information being shared from people who are meant to be assisting us with clear and informative material. It does not give confidence that London Resort staff are knowledgeable and can be trusted to provide accurate info.

LR state that they are splitting the parking between north and south of the river on a 3 to 1 ratio, but they don't seem to be taking into account the fact that the majority of the country is indeed to the north of the river, which would imply that a majority of the traffic could be coming from north of the river.

They have also failed to date to study the impacts of potential street parking to the north of the river. Again lacking in clear and informative materials, as the info has been studied and provided for south of the river.

We have also questioned what provision would be put in place to forewarn drivers if the parking facility at Tilbury is full or closed for any reason (boats not running due to weather etc), to date no information has been provided.

Conclusion

We do not feel that adequate consultation has been carried out for the London Resort scheme, and we certainly do not feel that the materials have been clear, informative, or adequate. We do not feel that there has been adequate information to allow us to be able to have responded in as meaningful manner as would like.

We would respectfully ask you to take these points into account when considering whether to accept the DCO application, based on the inadequacies of the consultation.

We would of course be happy to discuss any of the points raised in this response further should you wish, please do not hesitate to contact us.

More info on our objections and opposition to the proposed Lower Thames Crossing can also be found on our website www.thamescrossingactiongroup.com