

**From:** Dan Bramwell [REDACTED]  
**Sent:** 05 May 2021 12:42  
**To:** London Resort <[LondonResort@planninginspectorate.gov.uk](mailto:LondonResort@planninginspectorate.gov.uk)>  
**Subject:** LRCH REQUEST FOR EXTENSION OF TIME TO ADDRESS SSSI ISSUES  
**Importance:** High

Dear Sirs

I note from your website that "*the Applicant has written to the Planning Inspectorate requesting additional time at the pre-examination stage to allow for on-going engagement in respect of the Site of Special Scientific Interest notification from Natural England. The Examining Authority is considering this request and will respond in due course*".

I am a private individual with interests in the country's wildlife, rare and valuable habitats and the environment. I wish to state my strong objection to such an extension being granted for the reasons stated below:

- The Applicant has stated publicly it is aware the Swanscombe Marshes is an extremely sensitive ecological area and is home to many rare and endangered species. Thus, the fact that Natural England has designated it as an SSSI should not be 'news' to them and they should have considered the site's sensitivities in their initial ecological study and assessment and submitted plans
- I am no ecology professional or expert but support many different charitable organisations and NGOs and my understanding is that this site cannot just be replicated elsewhere... it is the site, along with its flora and fauna, that is special and relocation is not an option. Thus, the Applicant needs to go back to the drawing board to eliminate any of the SSSI site from within their plans
- If the Applicant hadn't lied about (or misrepresented) the site description in their initial letter to the Secretary of State DCLG (as it was then) seeking NSIP status for the project, then both DCLG/MHCLG and PINS would have been more aware of the site sensitivities...and the fact that there are active, vibrant and very successful businesses located on the industrial estates also not included in the site description
- Referring to the Applicant's site assessment (para 4.18) in their June 2020 EIA Scoping Report, it categorises 'Land Availability' as neutral which is inaccurate as now not all the required land is readily available due to the SSSI and the industrial estates; 'Land Use', 'Environment Constraints', 'Planning Constraints' and 'Regeneration and Economic Benefits' are all assessed as neutral, again there are strong reasons and justifications to say the Applicant misrepresented the information and has severely overstated the site options assessment. These latter should be reclassified as negative so as to get a fair comparison between the various sites
- The Applicant has had plenty of time during the pre-application stage and subsequently to address the issues posed by the SSSI and the wildlife issues, details of which have been circulating for many months and even during the period of their final statutory public consultation. Furthermore, if they had engaged with the local wildlife specialists as part of their engagement and consultation process, which they

failed to do adequately, they would have been more than aware of the local wildlife issues (from the experts!)

- The impact of further delays through an extension of time on the businesses and communities will be severe - more blighting and uncertainty, adverse impacts that locals have now been subjected to for over EIGHT YEARS since the project was first suggested. The Applicant's incompetence and lack of financial resources means the project is stumbling from pillar to post rather running smoothly and effectively as an NSIP DCO Application should. It begs the question "who is running the process - PINS or LRCH?!" The longer the process is extended the more civil servant's time and taxpayer's money is wasted
- As a matter of procedure, if either DCLG/MHCLG or PINS had been tasked to visit the site to establish the veracity of the Client's claims and site description (upon which I am advised you have to rely) then it would have saved substantial amounts of wasted civil servant's time and taxpayer's funds - a major procedural failure and one to take onboard with any future commercial NSIP Application.

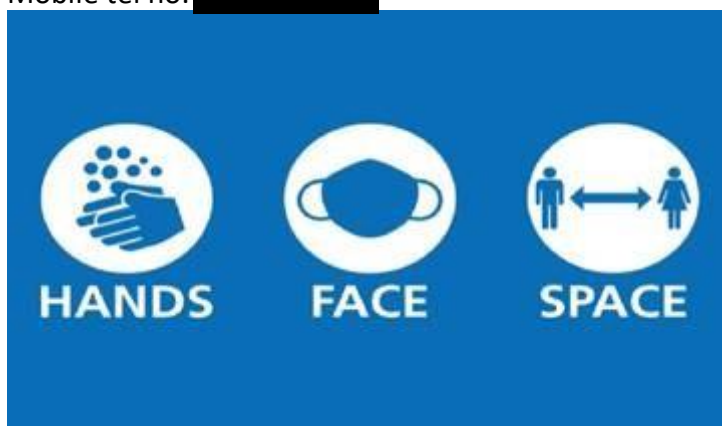
The above key points are robust and sensible grounds for The Planning Inspectorate to reject the Applicant's request for an extension of time to address the SSSI issue. Furthermore, The Planning Inspectorate should either request that the Applicant withdraws the DCO Application or The Planning Inspectorate rejects it immediately as it is based on erroneous and inaccurate information.

Yours faithfully

████████████████████

Dan Bramwell

Mobile tel no: ██████████



Please ██████ that the contents of this email and any attachments are privileged and/or confidential and intended solely for the use of the intended recipient. If you are not the intended recipient of this email and its attachments, you must take no action based upon them, nor must you copy or show them to anyone. Please contact the sender if you believe you have received this email in error and then delete this email from your system.

Recipients should note that e-mail traffic on Planning Inspectorate systems is subject to monitoring, recording and auditing to secure the effective operation of the system and for other lawful purposes.

*The Planning Inspectorate has taken steps to keep this e-mail and any attachments free from viruses. It accepts no liability for any loss or damage caused as a result of any virus being passed on. It is the responsibility of the recipient to perform all necessary checks.*

*The statements expressed in this e-mail are personal and do not necessarily reflect the opinions or policies of the Inspectorate.*

DPC:76616c646f72



**Please consider the environment before printing this email**