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**Statement in Relation to Application by London Resort Company Holdings for  
an Order Granting Development Consent for the London Resort**  
**Ref:L BC080001**

I refer to your letter, dated 21 December, addressed to 'All Interested Parties and Affected Persons'. Over recent years, I have submitted several representations to The Planning Inspectorate on this project and this submission summarises the key points. I stress that to avoid further inconvenience and damage to all the businesses on the Swanscombe Peninsular industrial estates, examination of this project should commence with all possible haste.

**INTRODUCTION**

Since 2015, I have worked with Peninsular Management Group (PMG) as a Public Affairs Consultant. My role was to assist them in trying to engage with the Applicant and with local politicians and other interested stakeholders to ensure that all parties are aware of the impact the development will have on the businesses. I have no material or financial interest in any business or land site impacted by this project.

PMG is an organisation formed to co-ordinate the interests of the landowners and approx.140 businesses which employed approx. 2,500 persons directly and a further 2,000 indirectly. The businesses are located on the Northfleet, Kent Kraft and Rod End Industrial Estates and the Manor Way Business Park. These are traditional industrial estates housing both clean and 'dirty' businesses, ie non-environmentally friendly operations. A critical factor of the estates is that many of the business operations are inter-twined and relocating a single business could affect others and services to communities thus severely impacting the local economy.

PMG cannot make decisions for individual businesses but is able to give guidance to parties, the final decisions about relocation and compensation being the responsibility for individual parties.

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There are three key issues to be addressed:

1. Project NSIP Designation and the process
2. Co-operation and Engagement Strategy
3. LRCH Consultation

## **PROJECT NSIP DESIGNATION AND THE PROCESS**

The information submitted by the Applicant to DCLG (as it was then) seeking NSIP status was inaccurate:

- In the site description, no mention was made of the active industrial estates to the west of the rail line;
- Thus, contrary to what the Applicant's Site Selection Matrix says, the land is not readily available as it is owned and occupied by businesses;
- The accuracy of the site description was not factually checked so the Secretary of State (SoS) was being asked to designate the project an NSIP status on inaccurate information which would have an impact on local employment;
- Furthermore, as the project design progressed the Applicant extended the red-line boundary to include the businesses on the industrial estates to the east of the rail line without referral to the SoS, impacting a further substantial number of businesses and jobs.

## **CO-OPERATION AND ENGAGEMENT STRATEGY**

All efforts were made to have constructive, continuous and meaningful engagement with the Applicant, local politicians and other stakeholders, in summary:

- Generally, politicians and other stakeholders were receptive to briefings and offered assistance, if appropriate, when relevant;
- The key focus was ongoing engagement and discussions with LRCH and its agents, in summary:
  - At the onset of any project, it is essential to engage with key landholders and effected parties. It was evident this had not happened. It was more essential in this case as the industrial estates were the key to unlocking the peninsular site;

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- Invitations were extended to senior representatives to visit the estates and meet the businesses to fully understand the relocation requirements and impact thereon. LRCH Chair (Steven Norris) and Director (Mr Abdulla Al-Humaidi) were invited to visit the estates and meet the businesses but never responded to invitations. Two previous Chief Executives did visit the estates with one commenting "I don't know how we are going to relocate these businesses". The latest Chief Executive was invited to visit the estates and meet the businesses shortly after appointment but never replied, despite chasing, and has not met the businesses or formally visited the estates.
- Irregular meetings were held between LRCH Senior Managers and PMG Executive, resulting in the following actions. The last meeting between LRCH and PMG businesses was approximately four years ago:
  - Establishment of a Property Working Group to agree Heads of Terms for business relocations and Site acquisitions: The Applicant submitted a draft 'Heads of Terms' but was thereafter reluctant to enter into discussions about detailed amendments;
  - A website was set-up approximately 4-5 years ago to promote potential relocation sites but this was not maintained thereafter on an on-going basis;
  - PMG suggested LRCH acquire any industrial estate sites 'coming to the market' to establish a foothold and give the project credibility. This was never pursued;
  - Several businesses had relocation feasibility studies undertaken (at LRCH expense) to explore relocation in detail but these were never progressed by LRCH due to a lack of funding;
  - PMG suggested that LRCH consider relocating Ebbsfleet United Football Club (which is owned the KEH Group) to reconfigure the east industrial estates using the land and thus integrate their 'backroom operations' alongside the existing businesses. This suggestion was totally ignored without any consideration;
  - PMG offered every assistance to LRCH to identify and contact businesses to establish their database. They even escorted agents around the estates to ensure they understood the layouts etc. LRCH never fully took advantage of this offer and this was evident from the consultation.

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## LRCH CONSULTATION

Comments relating to the final 'statutory consultation' are:

- As previously stated, the industrial estates are prime requirements if the project is to proceed due to their locations. Thus, the Applicant should have ensured that every business received details. PMG requested a copy of the Applicant's PMG business database so it could be verified to ensure accuracy. The request was declined.
- The Applicant failed to advise some key prominent businesses about the process, despite having already received technical relocation reports from them and owners being members of the PMG Executive;
- There was no confidence generally in the consultation process. Some businesses tried to submit comments but the response mechanism on their website declined to accept them or failed to register them.

## SUMMARY

It is very evident from the above there has been a major failing in the manner in which PMG and the businesses have been treated by the Applicant from the very onset. It has already caused excessive disturbances to the many businesses located on the Swanscombe Peninsular and thus it is requested that the Project proceeds to examination as a matter of urgency so that businesses can have stability and plan for the future.

To answer your questions:

### **1. Taking the current circumstances into account, can a continued delay in the commencement of the Examination of the Application until June or July 2022 still be justified in the public interest?**

No, the Applicant has been given every opportunity to address the weaknesses and outstanding issues in the current submitted application. In the interests of all parties - and to save further additional expenditure by all parties - the existing application should proceed to Examination immediately.

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**2. If a delay is still justified:**

- **(a) what steps will or should the applicant take to assure the ExA that the time period of the delay is justified;**
- **(b) is a schedule of updated and new documents and a schedule of consultation sufficient to justify ongoing delay; and, if not**
- **(c) what regular reports and other information should be provided to the ExA by the applicant and by what dates, to demonstrate that progress is being made and that the extension of time is being put to good use, which in turn might be suggested as being sufficient to offset the harm caused by ongoing delay and is therefore in the public interest; and**
- **(d) what further steps should the ExA take if commitments to progress continue not to be met?**

No further delay is justified. The Applicant has had ample time to address all issues and shouldn't have even submitted the 'incomplete' Application in December 2020 but only did so to meet land option deadlines. If need be, the ExA should proceed to Examine the existing submitted application.

**3. If, taking account of the changed circumstances, further delay is not justified, would it be appropriate for the ExA to curtail delay and to proceed directly to Examine the application as currently before it, commencing in March 2022?**

Yes, very much so and that is the sensible solution to the current situation.

**4. What other considerations might be relevant to this procedural decision?**

The on-going costs to all affected parties.

**5. What other possible measures might the ExA lawfully and fairly decide to take in the circumstances and recognising the concerns of parties?**

Request that the Applicant withdraws the Application and resubmits it again in due course when ready but as a very last resort. Ideally, the current application should proceed to Examination immediately.

**Dan Bramwell**  
**Former Public Affairs Consultant to**  
**Peninsular Management Group**  
**(and now retired)**  
**8th January 2022**