

From: [Dan Bramwell](#)
To: [London Resort](#)
Cc: [REDACTED]
Subject: BC080001 - THE LONDON RESORT PROJECT
Date: 06 January 2022 17:16:33
Importance: High

Dear Sirs

I refer to your letter, dated to 21 December, addressed to 'All Interested Parties and Affected Persons'. Over recent years, I have submitted several representations to The Planning Inspectorate concerning 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, the 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 intertwined and relocating a single business could impact 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.

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;
 - 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 action. 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 four 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.

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.

Please do not hesitate to advise me if you require any further information, clarification or wish to visit the estates.

Dan Bramwell
Formerly Public Affairs Consultant to
Swanscombe Peninsular Industrial Estates

6th January 2022



Dan Bramwell

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APPLICATION BY LONDON RESORT COMPANY HOLDINGS FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE LONDON RESORT

Response to ExA's, Lead Members letter of the 21st December 2021 Ref: BC080001

I am a director of two companies on the Northfleet Estates and the Peninsular Management Group Ltd; that represents many of the 140 businesses on the Estates throughout the nine years of LRCH operations.

I wish to assist with the following responses:

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?

The public, local authorities, businesses and residents of this area have all suffered major stress, financial loss and unreasonable suffering due to the excessive blight from the LRCH theme park proposals. This has been made far worse due to their continual announcements of imminent start dates that never come off, and total lack of care or empathy for anyone other than themselves including a complete lack of proper consultation with businesses over 9 hideous years.

For the many small family businesses on the Northfleet estates that have been unmercifully mentally and financially hammered time and again by these delays and leisure industries in other parts of the country, the stress is crippling because under CPO circumstances, many will get no compensation or close to it in exchange for the complete loss of their businesses. That is sickening and they need resolution one way or the other.

My companies losses total over three million pounds in blighted rents and lost deals. We have and continue to suffer massive stress and deferred redevelopment plans. We have been unable to raise bank loans due to blight and it has taken up thousands of hours of our time. If one magnifies that across the businesses of the estates, the various authorities, NGO's, wildlife bodies and government departments including the planning inspectorate, the collective sum of financial expenditure and time must be absolutely vast and continuing.

Whilst LRCH from their side claim to have spent £60 millions, a close examination would almost certainly show most of it to have been wasted by incompetence, with promotion costs for a scheme like this, if driven by efficient management and focus, probably not exceeding a fifth of that sum. Their true costs are therefore significantly less than the financial damage that they have caused others to suffer and continue to suffer as long as this drags on.

No one forced LRCH to apply for the DCO and they should have been ready for it. There can be no justification for any further extensions and any more would definitely be against the public interest. Please bring this to a close as soon as absolutely possible and refuse all further extensions of time.

2. a. If a delay is still justified: what 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?

The LRCH, CEO has recently stated that they intend to make no major changes to the DCO submission, despite the SSSI designation; so it would seem that there has never been any justification in asking for the present extensions and can be no justification for granting any more.

This is a dysfunctional applicant that has little idea what they are doing and they should be treated as such. This article is of interest relating to their past projects where the only thing that continues despite the big ideas is spin [REDACTED]

Delays already granted by far exceed any envisaged or anticipated by the DCO process. LRCH have also completely failed to honour the terms imposed for the present extensions by way of regular meetings and reports and are therefore just being vexatious to the severe detriment of all others.

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 absolutely.

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

We have always been concerned that LRCH have no money. Their recent £5millions government backed Covid-19 loan from the British Business Bank throws further doubt on the continual assertion that they are well financed. Lack of finance may well lie behind them trying to delay commencement of the hearing. Can the ExA obtain a guarantee that they have sufficient funds to meet all their liabilities in a DCO hearing before our companies, other interested parties, NGO's and the ExA start spending huge sums on legal works preparing for a hearing with an already failing company.

We have long suspected high level political influence is being exerted on the Planning Inspectorate to keep agreeing undeserved extensions of time to the Kuwait backed LRCH: That perhaps our businesses and this whole area has been looked upon as sacrificial 'small beer' by certain parts of the government engaged in a potentially much larger deal with Kuwait. This is fuelled by this recent (September 2021) government announcement. We look to the ExA to ensure that this is not the case, or to reveal any pressures that have been or are being exerted on them, so we may take it up politically. [REDACTED]

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

LRCH must make it clear ASAP exactly what documents have been altered before a hearing starts so our legal representatives have time to consider them. This should be by the end of January at the latest, with no further submissions or altering of submissions after that time.

LRCH should be made to pay all of the other parties legal costs that have been incurred in the existing delays, including the extended costs of the ExA.

Mr D O Hilton

Peninsular Management Group Ltd, Buckland Dartford Ltd, Vitesse Investments Ltd