

## **London Resort Consultation Response**

**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 will particularly focus on the aspect of the relationship between the proposed London Resort 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.

We already had concerns in relation to the position of the London Resort and the negative impact it would have on the road network and pollution levels. However, since you have added the additional parking facilities to the North of the River Thames these concerns have grown even further.

We would also state that some of our objections in regard to the proposed Lower Thames Crossing included concerns over how destructive it would be and the damage it would cause to the environment, so these concerns also extend to any development that causes destruction and harm to the environment, and adds congestion and pollution to our lives and communities.

### **Inadequacies of London Resort Consultation**

We do not feel that adequate and clear information has been provided as part of the London Resort Consultation. There is a lot of documentation, and it is very difficult to try and make sense of. In particular the way the PEIR has been broken up is 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 us to be able to give meaningful responses to the consultation.

Your email response to us dated 17<sup>th</sup> Sept states "*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.*"

In line with consultation guidelines we would therefore suggest that if significant changes are made that further consultation is needed, and not just for you to rush straight to DCO stage.

How can you possibly be publishing a draft DCO when you need to take all consultation responses into account before preparing your DCO application? A consultation is not just a tick box exercise you need to actually read, register, and analyse the responses, this is a legal requirement of the consultation process. To be publishing drafts of your DCO before consultation has ended seems very presumptuous, and does not give the impression that you intend to fully read and analyse our responses to this consultation.

We feel much of the information in the consultation materials is 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.”* Give us no confidence at all, and show that adequate data has not been obtained or provided in the consultation materials yet again.

We also 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.

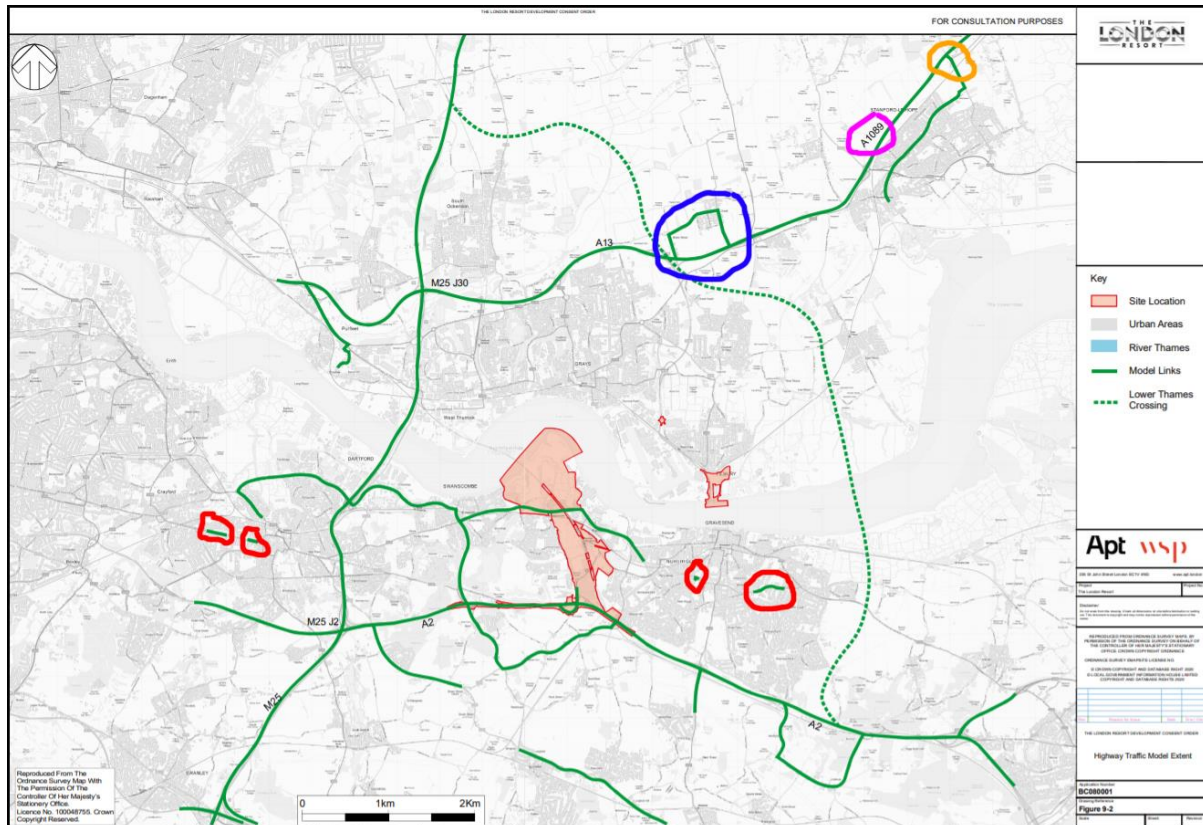
In particular if holding a consultation for a project of this scale, during the COVID-19 crisis we feel far more needs to be done to ensure everyone is aware of the consultation and your plans.

Not only are you not able to offer the regular consultation experience to people, with public events that are usually a standard part of the consultation process. You 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 you 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 you 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.

**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>



This document is incorrect as you 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 you 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 you have failed to include it.

When we raised this point via email with you 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*

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*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.

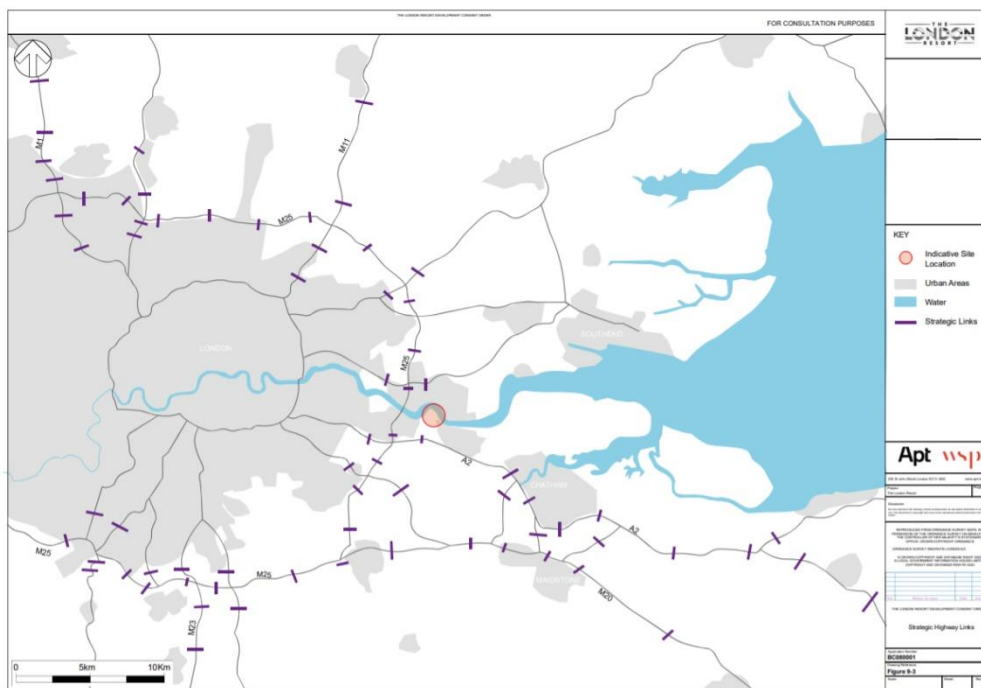
We can in no way understand why you have highlighted the 'junction' for want of a better word that we have circled in orange. Again this is not a route that is directly accessible from the A13 as your map gives the impression of. It is also a very strange assumption to come to that this route would be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

You are including the proposed Lower Thames Crossing in this map, yet you 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.

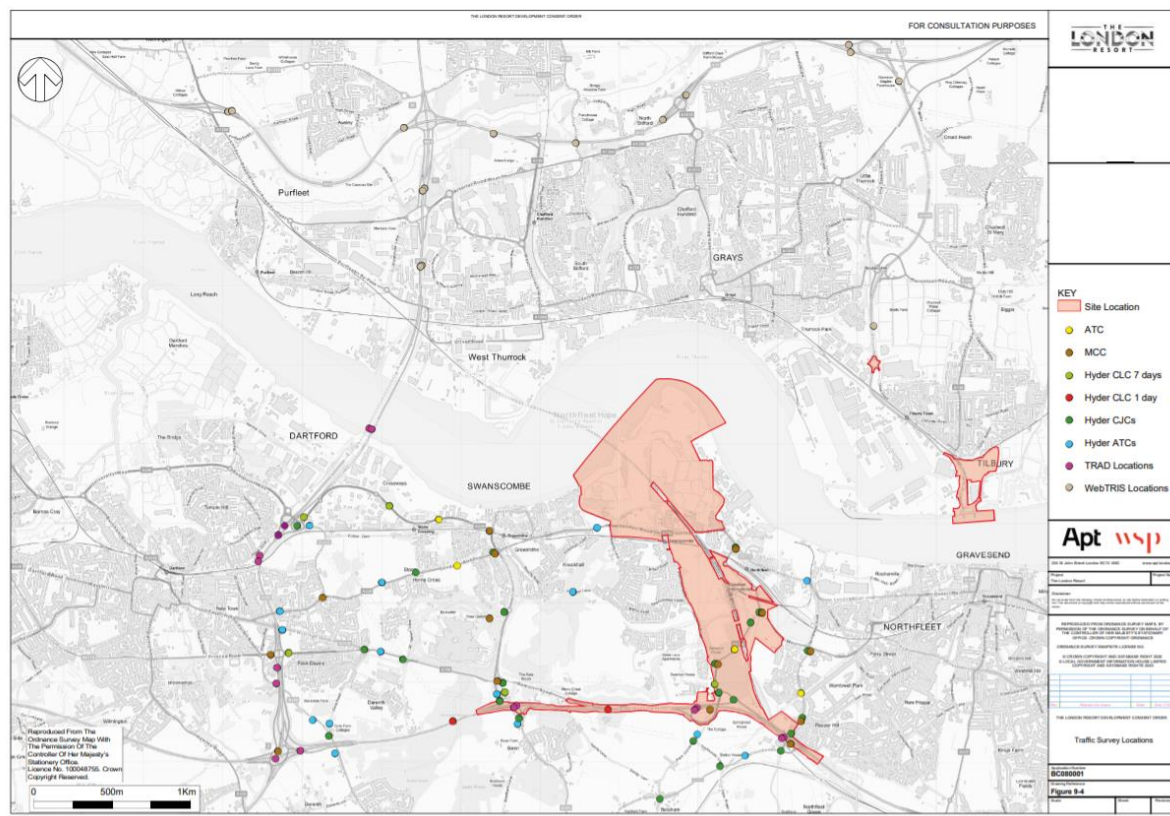
According to 9.113 in the PEIR Ch 9 Transport document -

<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-ea0632b4417f/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>

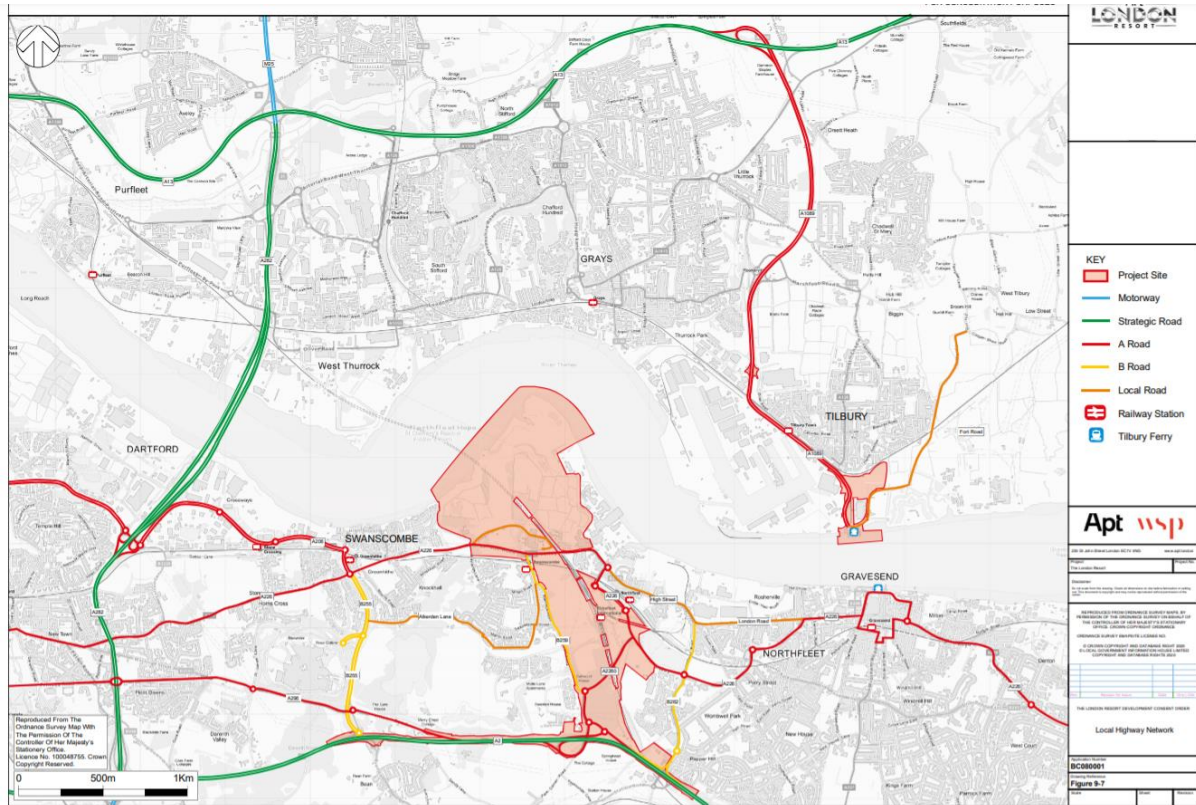


The figure above is supposed to show the Strategic Road Network. However you have glaringly omitted to include the A13 up to the A1089, and the A1089 itself, both of which are part of the Strategic Road Network. Yet another inadequacy of the consultation materials, and proof of lack of clear and informative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

### 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 you are showing the A13 up to and past the A1089 as part of the Strategic Road Network, yet you 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. You 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.

For your info, as it seems you need it, 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](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 you have no idea yourselves, and there isn't even any continuity in your errors across the two figures. How are we meant to have any confidence in your 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 2<sup>nd</sup> 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.

## **Traffic issues**

The proposed location of the scheme is in an area that is already heavily blighted by traffic congestion and pollution issues. We cannot support a scheme that brings yet more traffic and therefore pollution to areas that are already suffering so severely.

Currently many of the traffic issues relate to the Dartford Crossing, and we are obviously more than aware of the proposed Lower Thames Crossing. If the LTC goes ahead it would mean that the proposed London Resort Scheme would be between the two crossings.

We are also aware that there are not adequate connections between the proposed LTC and the existing road network, along with built in bottlenecks which would bring yet more chaos to our roads.

We are also aware that Highways England have not considered or planned for how traffic would migrate between the two crossings when there are incidents, and that again there are not adequate connections, which will result in yet more chaos, congestion, and pollution.

This is part of the reason we do not consider the proposed LTC to be fit for purpose, and why we feel the proposed London Resort will just add to those problems.

We have asked a number of times now if London Resort are aware of these issues surrounding the proposed LTC in relation to London Resort, and to date we have not had an answer. Instead we get wishy washy responses about Highways England, when we have specifically asked for London Resort's knowledge and opinions on this aspect.

The avoidance and lack of response gives us no confidence that London Resort are aware or have taken this aspect into consideration in plans. This is of course a great concern considering the size of the scheme and the amount of traffic it will bring to the areas both sides of the river.



### **South of the river**

We have serious concerns that the proposed scheme would generate traffic issues to the south of the river, and in turn this will bring more pollution.

Just in general a scheme of this size will bring more traffic and pollution. However, when you also take into account the location of the scheme in relation to the proposed LTC, and the inadequacies of that project things become even more concerning.

We bring to your attention the fact that when there is an incident at the Dartford Tunnels or surrounding area, and traffic needs and wants to migrate to the LTC to cross the river, it would have to come off the M25 onto the A2 coast bound. However, the slip road from the A2 onto the LTC is just one single lane, a definite built in bottleneck that will cause horrendous traffic issues, which will of course in turn back up along the A2 and also incorporate London Resort traffic as well.

Of course when there is an incident to the southern side of the LTC heading northbound and traffic needs to migrate to the Dartford Tunnels, equally this will mean traffic backing up along the A2 just as it does now, but with London Resort traffic as well.

### **North of the river**

Similar issues stand to the north of the river. Even without incidents there would be traffic issues in relation to the LTC and London Resort.

Traffic attempting to access the parking facility in Tilbury (which is at the southern end of the A1089) from the LTC would not have a direct connection to the A1089 south. The same can be said for any traffic, including that from the A128 at the Orsett Cock junction on the A13, where there is also no direct access to the LTC/A1089 joint junction with the A13.

Instead traffic would need to travel eastbound along the A13 all the way to the Stanford junction, go up and around the traffic lighted roundabout, alongside DP World and other traffic, and then back westbound along the A13 to just past where the Orsett Cock goes over the A13, and onto the new joint LTC/A1089(south) junction slip road. This detour is around 6 miles.

If traffic avoids the LTC because of the lack of direct connection to the A1089 then it would have to come off the M25 onto the A13 heading eastbound to take the A1089 junction. This means that traffic would still be coming into close proximity to the Dartford Crossing. This is an area that is already heavily congested, and you are also stating that you are attempting to keep traffic away from by adding the new parking facility north of the river, yet this proves much of the extra traffic your scheme will generate will still be needing to access via the already congested area.

Above are concerns purely relating to when there is not an incident at either crossing (if the LTC goes ahead). If the LTC goes ahead and there is an incident at either crossing to the north side of the river there are again not adequate connections for migrating traffic.

When there is an incident on the LTC heading northbound past the A13 (ie between the A13 and the M25) then traffic would need to come off the LTC heading eastbound on the A13, and use the Orsett Cock roundabout to turn around and head back westbound to the M25 from the A13, again bringing more traffic into the area surrounding the Dartford Crossing.

When there is an incident heading southbound on the LTC, traffic would have to do the same, and head to the Dartford Crossing QE2 bridge via the A13/A282.

When there is an incident at the QE2 bridge and traffic wants and needs to migrate to the LTC, there is no access to the LTC from the eastbound carriageway of the A13 from the M25. All traffic wishing to use the LTC from the M25 via the A13 would have to use the Stanford Detour as previously outlined.

Alternatively, if traffic instead accesses the LTC from the M25, it would be 5 lanes of M25 traffic and just 2 lanes of LTC southbound until it passes the A13, another built in bottleneck. When this happens and traffic starts cutting off the M25 earlier, along the A127 (J29) and A12 (J28) hoping to cut down the A128 to the LTC, it will of course find that it too has to use the Stanford Detour to get onto the LTC, as there is no direct connection to the LTC or A1089 (south) from the Orsett Cock.

### **Recap**

As we hope you can now see, any of these eventualities would result in chaos, congestion, and pollution throughout the areas both sides of the river. The additional traffic that the proposed London Resort would create would both be part of the problem and also be caught up in the congestion, meaning unhappy, frustrated London Resort customers stuck in traffic, fed up and from your point of view not on site spending money.

We do not feel that the proposed location, with the road network either as it is, or including the proposed Lower Thames Crossing is adequate without the additional traffic that the proposed London Resort would bring, let alone with it!

### **Parking facility in Tilbury**

Whilst you state that you are splitting the parking between north and south of the river on a 3 to 1 ratio, you 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.

You 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.

You are now proposing to bring facility to draw people visiting your scheme to the north of the river to use a boat to cross the river, which means equally they are likely to also be

looking to park north of the river, and not necessarily in your parking facility. It is a known fact that there are sites online that show people where parking and street parking is available. This will not necessarily be as a result that there are not enough parking spaces, but because people will try to avoid paying what is usually a hefty parking fee at such facilities.

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, to date no information has been provided. How will you notify traffic whether the parking facility and boats are running or whether they need to use the parking facilities to the south of the river?

### **Actual parking and facilities**

We understand that this will incorporate multi-storey parking as well as facilities on site. However, yet again there has been no adequate info provided as to height, how many storeys, visual appearance. We have been told that there will be a terminal with facilities that will include ticketing, toilets etc, but again not where or exactly what is being proposed, and what it will look like visually.

Residents already suffer with the issue of littering along the A1089 (a Highways England road), so having more traffic using the A1089 could also result in more littering.

We all know that people tend to buy 'things' as theme parks, and usually with these kind of attractions parking is within the site and can be monitored and maintained by staff on site. However, by placing the parking facility on the opposite side of the river and using boats to transport people this must increase the risk of littering, both by accident and intentional over a much wider scale, including the actual river.

If this goes ahead we need London Resort to ensure that both preventative measures and actions are taken to ensure that littering is dealt with and cleaned up quickly and efficiently.

### **River Transport**

The concept of you proposing the additional parking facility to the north of the river is meant to be to ease traffic issues south of the river. Yet it is hardly solving a problem to just purely move the issues to a different area, which are clearly outlined above.

With boat movements likely to be in the region of 40 crossings in each direction a day, this also adds to river traffic. Thames Clipper may as you state be looking into hybrid boats, but as with many of your statements in the consultation materials this is not guaranteed, simply hopes written down rather than concrete facts and commitments.

The fact these boat movements will be crossing the river must also have an impact on the already busy shipping lane going along the Thames. Whilst you have commented that the Thames Estuary Growth Plan seeks to promote greater use of the river, there could be a

difference between moving along the river as opposed to going back and forth across it, which would interfere with movements from ships and boats going up and down the river. Boat and ships needing to hang about on the water due to boats crossing their paths just means additional pollution, a similar effect to congestion of roads. We need air quality improved in these areas, not worsened.

What happens to boat crossing during bad weather, fog, wind etc, will they need to be cancelled as often happens with the ferries? As mentioned before how will you advise drivers if the boat service is not operating and divert them to south of the river?

## **Construction and operations**

We have reviewed the timeline for both projects, the proposed LTC and London Resort, and can see that is both continue to progress with their predicted timelines, there will be a definite overlap.

Not only would London Resort be carrying out construction both sides of the river at the same time as LTC would be under construction, but main LTC construction routes would be involved in London Resort construction.

On top of that, even at the point when London Resort is due to open to the public, including your parking facility in Tilbury, construction work on the LTC would still be continuing. Your customers would need to arrive at the parking facility in Tilbury via the A1089 which is a main construction route for LTC.

Further analysis and consideration needs to be given to the impact of both projects running their construction side by side simultaneously, and LTC continuing after London Resort opens, if both projects go ahead.

Whilst we appreciate that with 90% of construction materials coming via the river, rather than road it will reduce road traffic, we are also very aware that river transport is not free from air pollution. In fact we know how polluting it can be when there is not dockside power for the ships/boats and dirty generators are needed.



## **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.

With the little information that has been provided we cannot support the scheme due to serious concerns over the negative impacts it would have on the roads, as the London Resort would create additional congestion and pollution to areas that are already suffering from heavy congestion issues, and with illegally high levels of pollution.

We therefore strongly oppose the London Resort scheme due to our serious concerns in regard to the transport and roads aspects of the scheme, as we feel it will negatively impact roads, and bring extra congestion and pollution to the areas both north and south of the river.

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](http://www.thamescrossingactiongroup.com)