

LOWER THAMES CROSSING  
DEVELOPMENT CONSENT ORDER EXAMINATION

WRITTEN SUBMISSIONS

at PROCEDURAL DEADLINE B on behalf of  
RUNWOOD HOMES LTD  
Unique Reference 20035580

1. These written submissions made on behalf of Runwood Homes Ltd at Procedural Deadline B are for the purposes of the Preliminary Meeting Part 1 (PM pt1) to be held on 6 June 2023.
2. Noting that the Examination (and by implication the pre-Examination stage) is intended to be principally a written process and that representations made in writing carry equal weight to those made orally, Runwood Homes Ltd sees no need to attend the Preliminary Meeting but asks that these written submissions are considered before any procedural decisions are made.
3. Runwood Homes Ltd wishes to make submissions on Agenda Items 4 and 5 for PM pt1.

Agenda Item 4: Initial Assessment of Principal Issues

4. As set out in its Relevant Representations, Runwood Homes Ltd considers that the Application's consideration of intra-project effects is inadequate. Whilst it may be implicit from the reference to "linkages between issues" in the Initial Assessment of Principal Issues (page B1 of Annex B of the Rule 6 letter), that the ExA already has well in mind the need to explore cumulative intra-project effects on particular receptors, it is submitted that the issue of cumulative intra-project effects should be specifically identified as a Principal Issue so as to ensure that this important environmental topic is given the attention that it deserves. The Lower Thames Crossing is multi-dimensional in terms of its impacts on the receiving environment (especially from Runwood Homes Ltd's perspective, the effects on human receptors), and a topic-by-topic examination of effects, whilst obviously a sensible and necessary step as part of the Examination, should be accompanied by specific consideration of the combined or cumulative effects of the project on those affected by it.
5. In this regard it is noted that the Initial Assessment of Principal Issues does make specific reference to "links between the effects of the proposed development and other major projects and proposals (cumulative and in-combination effects)", which are sometimes referred to as inter-project effects, but does not at present have a similar reference to intra-project effects. Runwood Homes Ltd asks that this omission is addressed when the list of Principal Issues is refined by the ExA.

Agenda Item 5: Draft Examination Timetable

6. Runwood Homes Ltd notes the concerns expressed by Thurrock Council about its ability to effectively participate in the Examination if the current draft timetable is pursued, not least with regard to the preparation and submission of a comprehensive Local Impact Report. Since the Whitecroft Care Home lies within Thurrock and Runwood Homes Ltd would expect Thurrock Council to address community and healthcare impacts in its Local Impact Report, Runwood Homes Ltd supports the position of Thurrock Council that it needs to be given adequate time to enable it to participate fully in the Examination, even if that may mean some delay to the start of the Examination.
7. Irrespective of the dates ultimately decided for the timetable, Runwood Homes Ltd notes that dates are reserved for future Issue Specific Hearings (currently envisaged in September, October, and November 2023) but no topics have yet been ascribed to those ISHs. Runwood Homes Ltd asks that the intra-project effects of the Lower Thames Crossing are made the subject of one or more ISHs, considered on a geographic basis, so that the effects on particular receptors who will experience cumulative impacts from the proposed development are fully explored.

8. Runwood Homes Ltd also asks that, given the duration of the construction period and the wide-ranging nature of the construction impacts, construction impacts are made the subject of an ISH (potentially combined with the issue of intra-project effects).