

**THAMES CROSSING
DEVELOPMENT CONSENT ORDER EXAMINATION**

SUMMARY OF WRITTEN REPRESENTATIONS

at DEADLINE 1 on behalf of

KATHRYN HOMES LTD: Unique Reference 20035583

RUNWOOD HOMES LTD: Unique Reference 20035580

RUNWOOD PROPERTIES LTD: Unique Reference 20035582

SUMMARY OF WRITTEN REPRESENTATIONS

1. The full Written Representations are made on behalf of Kathryn Homes Ltd, Runwood Homes Ltd and Runwood Properties Ltd (“the Objectors”) at Deadline 1. Each of the Objectors is a registered Interested Party and has separately made Relevant Representations but they share common interests and so have combined together to make joint Written Representations setting out the details of their objections to the Lower Thames Crossing.
2. As was explained at OFH2, Katherine Homes owns the site of the Whitecroft Care Home, Stanford Road (A1013), Orsett, Thurrock. Runwood Homes operates the Care Home. Runwood Properties owns adjacent land to the east and south which provides part of the rural setting of the Care Home. All three companies are related, with Runwood Homes as the parent company of Kathryn Homes and also sharing directors with Runwood Properties. Runwood Homes is in the process of acquiring ownership of the site of Whitecroft from Kathryn Homes and the transfer is expected to be completed later in the summer.
3. A general explanation of the location and current operation of the Whitecroft Care Home was provided by the Objectors at OFH2 and that information is also set out in the Post Hearing Submissions following OFH2. It is therefore not repeated here. In summary, the Care Home is located in close proximity to the major Baker Street intersection of the LTC/A13/A1089 and it provides 56

bedspaces catering primarily for persons suffering from dementia and other cognitive impairments. For most residents, Whitecroft is their final home and therefore caters for their 'end of life' needs. A typical stay at Whitecroft will be between 6 months and 48 months. As at July 2023, there were 48 residents at Whitecroft and of those, 34 residents (71%) were living with some form of dementia-related condition.

4. The effects on Whitecroft of the construction and subsequent operation of the LTC project (including the various other highways that are to be altered in conjunction with the LTC (A122) itself), by reason of their proximity, magnitude, intensity, and duration, are such that if the project secures development consent it is likely that Whitecroft has no realistic future as a care home catering for vulnerable elderly people. There are significant shortcomings in the Applicant's assessment of those effects, and the Objectors are not satisfied that complete or accurate information has been provided to date to allow a full assessment of the effects. At the very least the deficiencies need to be remedied so that the ExA is in a position to make a properly informed judgment. The deficiencies mean that at present it is not possible to show that the Public Sector Equality Duty has been satisfied by the Applicant in formulating the project or could be satisfied by the Secretary of State when making a decision on the Application.
5. However, based on the information that is available, the Objectors do not consider that the effects are compatible with a continuance of the care home operation. The juxtaposition of the LTC and the care home is unacceptable. A caring, supportive, and tranquil environment addressing the particular needs of a vulnerable community cannot be provided or maintained in the midst of one of the largest construction sites in the country. Given the extended duration of the construction period and the age/longevity of the residents of Whitecroft, it is not acceptable to impose the effects on them for what, for many, will be the remainder of their lives. Nor do the Objectors consider that there is meaningful mitigation that could reduce the effects to an acceptable level. For this reason, the operational effects of the LTC are secondary because the care home is unlikely to survive the 5+ years of construction

activity. However, if it did do so, the enduring impacts of the LTC during its 60+ years of operation would also fail to provide the caring, supportive, and tranquil environment that is required. Either way, Whitecroft does not have a realistic future if the LTC is granted development consent. The proper (and obvious) answer, if the LTC is to proceed, is to relocate the Whitecroft Care Home to a new site before construction commences.

6. Whilst the impacts on the residents of the Whitecroft Care Home are the main focus of the full Written Representations, it is also the case that the LTC proposals will have impacts on local employment at the care home if it cannot endure and on the availability of care home placements in the Thurrock area, and also that the proposals will have negative impacts on the historic environment by adversely affecting the significance of the listed farmhouse at Whitecroft, which have not been adequately assessed by the Applicant.

7. The structure of the full Written Representations is as follows:

- Introduction and Overview
- Description of physical works and activities comprised in the LTC
- Shortcomings in the Applicant's assessment of effects on Whitecroft
- The Objectors' provisional assessment of effects on Whitecroft
- Scope for mitigation of effects
- Meeting the Public Sector Equality Duty
- Need for relocation
- Conclusion

8. The full Written Submissions are accompanied by the following specialist technical reports, attached as Annexes:

- Annex A: Psychiatric report by Dr Hugh Series (July 2023)
- Annex B: Review of Chapter 12 of the ES (noise and vibration) by BY Acoustics (February 2023)
- Annex C: Air Quality Review by Air Quality Consultants (May 2023)

- Annex D: Technical Note on Construction Traffic by Transport Planning Associates (July 2023)
- Annex E: Heritage Representation by HCUK Group (July 2023).

9. The Objectors remain willing to engage with the Applicant on the question of relocation but there should be no doubt that the proposals in their current form, which are wholly inadequate as regards their impacts on the residents of Whitecroft, are simply not acceptable and so should not be approved.