

Our Ref: BBY/JBG/371052.00001  
Your Ref: TR010032  
Date: 19 November 2024

The Rt Hon Louise Haigh MP  
Secretary of State for Transport  
Department for Transport  
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Dear Madam

### **Planning Act 2008**

#### **Application by National Highways for an Order Granting Development Consent for the Lower Thames Crossing Project (TR010032)**

**Our clients: Runwood Homes Limited, Runwood Properties Limited and Kathryn Homes Limited**

**Site: The Whitecroft Care Home, Stanford Road, (A1013), Orsett, Thurrock**

This letter is sent to the Secretary of State for Transport (“the SoS”) on behalf of Kathryn Homes Ltd, Runwood Homes Ltd, and Runwood Properties Ltd (“the Objectors”). Each of the Objectors is a registered Interested Party but they share common interests and so have combined together to make this representation in order to provide the SoS with an update on relevant matters.

We note the deadline for making the Development Consent Order has now been extended to 23 May 2025.

The Objectors would like to express their concern with the uncertainty posed and the problems this is likely to create. National Highways has only visited the Whitecroft Care Home twice during the two promotions of the Lower Thames Crossing, the second attendance being your Inspector’s visit at the Objector’s request on 14th September 2023, where National Highways attended prior on that morning and asked the Objectors to cancel the site visit. National Highways has for the bulk of the promotion refused to acknowledge that the Whitecroft Care Home and the Objectors would be impacted by the scheme. National Highways has failed to satisfactorily engage with the Objectors and failed to appropriately consider the Whitecroft Care Home

At present it is unclear whether the Order for the Lower Thames Crossing will be granted and if granted when it will be funded. Whilst including provisions to acquire The Whitecroft Care Home in an Order (if it is to be granted) will allow the Objectors to be entitled to compensation, the normal statutory three month timescales for acquisition (unless extended) will almost certainly prevent the relocation of a care home that serves the local community and will result in the loss and extinguishment of this Care Home facility that looks after approximately 60 residents, specialises in residential care of people with dementia, directly employs around 60 people from the locality and has been established for over 25 years.

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We reference the strong likelihood of the loss and extinguishment of the Whitecroft Care Home noting that it is unlikely that planning permission for a relocation could be obtained within six months and that a transition of residents would take six months, before even considering the time and resource needed for securing an alternative site or property and preparing it against a backdrop of uncertainty for both the Lower Thames Crossing scheme itself and absence of support from or agreement with National Highways.

To confirm, in addition, that no agreement has been reached between the Objectors and National Highways on an acquisition by agreement.

Yours faithfully

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**Birketts LLP**

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