

Thurrock Council, Civic Offices  
New Road, Grays  
RM17 6SL

12 March 2026

Your Reference: EN02007  
Interested Party Number: XXXXXXXXXX

Ms Susan Hunt  
Lead Member of the Examining Authority  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Dear Ms Hunt,

**Application by National Grid Electricity Transmission (NGET) for a Development Consent Order (DCO) for the proposed Norwich to Tilbury Project (Application Reference: EN020027) (Project)**

**Comments on the Applicant's Deadline 1 Submissions**

Thurrock Council is writing to respond to the following points from the Applicant's Deadline 1 submission dated 26 February 2026:

- *Further update on Scenario B and Lower Thames Crossing*
- *Drainage Strategy DCO*

**Comments on the Applicant's update to Scenario B and LTC**

The Applicant notified the Examining Authority ("ExA") of its intention to proceed with Scenario B of the Project due to overlap with Lower Thames Crossing ("LTC") on 9 February 2026. In the Applicant's Deadline 1 Cover Letter they confirmed they intend to submit the updated documents for this change at Deadline 5 (10 June 2026). However, this deadline poses a significant issue for the Council, as the examination is scheduled to close in August 2026, leaving insufficient time to properly review the revised material. Therefore, the Council requests the ExA to ask the Applicant to provide the updated documents at an earlier date to ensure sufficient time for thorough review.

The Council is not clear why the Applicant requires until 10 June 2026 to provide the updated documents for Scenario B, beyond the statement that a number of documents will need to be amended. While the Council recognises that the change may necessitate updates across multiple documents, the scale of those updates should not result in the burden of an accelerated review being passed to Interested Parties or the ExA within an already constrained examination timetable.

To ensure that the Council has sufficient time to undertake a thorough review of the revised material, the Council requests that the ExA ask the Applicant to provide the updated documents at an earlier stage in the examination. The Council considers that provision of the updated documents by Deadline 3 (10 April 2026) or at least by Deadline 4 (12 May 2026), would allow a more reasonable period for review and engagement.

If the updated documents are not provided until 10 June 2026, there is a significant risk that the Council and other Interested Parties will not have adequate time to fully assess the implications of Scenario B before the close of examination. This could limit the ability of parties to provide considered representations and may constrain the ExA's ability to examine the changes in sufficient detail.

If the ExA does not consider it appropriate to request that all updated documents are submitted earlier than Deadline 5 (10 June 2026), the Council would welcome consideration of an alternative approach. In particular, the Council would support the Applicant providing the key documents necessary to understand the implications of Scenario B at an earlier stage in the examination, with any consequential or supporting updates to the wider suite of documents remaining to be submitted at Deadline 5.

### **Drainage Strategy DCO**

Thurrock Council has met with the other lead local flood authorities ("LLFAs") affected by this Project and have agreed to take the same position with regard to our response to the Drainage Strategy. The other LLFAs are Suffolk County Council, Essex County Council and Norfolk County Council.

[REP1-072] – 8.2. Drainage Strategy DCO (Final Issue A) ("Drainage Strategy") is 240 pages long and deals with inherently technical matters. Normally, the LLFAs would expect a drainage strategy to have been included as part of the application materials. In many cases, we make agreements with applicants to get early sight of key technical documents before acceptance, in order to have sufficient time for them to inform our relevant representations and local impact reports ("LIRs"). Due to the submission of the Drainage Strategy at Deadline 1, the Council was not able to review and make comments in its LIR.

If this document had been published with the rest of the documentation on the acceptance stage, our engineers would have had 11 weeks to review the Drainage Strategy before the relevant representations were due and nearly 22 weeks before the LIRs were due. Because the Drainage Strategy was only submitted at Deadline 1 the LLFAs have only had it for 2 weeks.

This is insufficient time to provide a comprehensive technical review of the Drainage Strategy. We recommend that the ExA should take the opportunity of the ExA's first written questions to ask the LLFAs for their detailed technical view on the Drainage Strategy. In particular, the ExA may wish to ask the LLFAs how the Drainage Strategy should be secured in the draft DCO, and what changes to the Drainage Strategy would be necessary to make it suitable for use as an outline drainage strategy.

What Thurrock Council can say at this point is that the Drainage Strategy will require further work before it can be used as a basis for detailed design at a later stage. At a minimum, the following information will be required in the Drainage Strategy:

### 1. Drainage Layout Drawings

Separate drainage layout drawings should be provided for both temporary works areas and permanent development sites. These should clearly identify the location, type and function of all proposed Sustainable Drainage Systems ("SuDS") features and demonstrate the overall surface water management strategy.

### 2. Hydraulic Calculations

Detailed hydraulic calculations should be provided to demonstrate that adequate attenuation capacity is available within the site to manage runoff for a range of rainfall events, including the 1 in 100-year storm event with a 40% climate change allowance.

### 3. Overland Flow Modelling

Surface water modelling should be undertaken to demonstrate how existing and proposed overland flow paths will be managed. The modelling should confirm that flows can be safely intercepted and conveyed without increasing flood risk within the site, the surrounding area, or the upstream catchment.

### 4. Interaction with the LTC Scheme

The Drainage Strategy should consider and demonstrate any potential interactions or cross-implications between the proposed drainage arrangements and the infrastructure associated with the LTC across the relevant catchments.

### 5. Surface Water Flood Risk Mapping

Plans should be provided showing an overlay of the Environment Agency's Risk of Flooding from Surface Water mapping across all temporary and permanent works areas, demonstrating how the proposed layout has taken account of areas potentially susceptible to surface water flooding.

### 6. Water Quality – High Pollutant Risk Sites

For sites identified as having high pollutant loading, a Water Quality Risk Assessment should be submitted in accordance with Environment Agency requirements to demonstrate that surface water discharges to a watercourse or river will not adversely affect the receiving environment.

### 7. Water Quality – Medium to Low Pollutant Risk Sites

For sites with medium to low pollutant risk, a Simple Index Approach ("SIA") assessment should be undertaken in accordance with the CIRIA SuDS Manual C753 to demonstrate that appropriate levels of treatment are provided.

### 8. Water Quality Monitoring

Details of water quality monitoring arrangements should be provided for the construction, operational, maintenance and decommissioning phases, setting out how potential pollution risks will be managed and monitored throughout the lifecycle of the development.

### 9. Groundwater Monitoring

In areas identified as susceptible to groundwater flooding, groundwater monitoring data and supporting assessment should be provided to demonstrate that groundwater conditions have been appropriately considered in the drainage design.

The Council and the other LLFAs are continuing to review the Drainage Strategy and may raise further detailed technical comments as that review progresses. A detailed technical review will enable the LLFAs to ensure that the proposed drainage strategy is robust, appropriately secured within the draft DCO, and capable of being developed into a deliverable detailed drainage design that manages flood risk and water quality effectively.

In summary, the Council requests that the ExA:

- Request that the Applicant provides the updated documents relating to Scenario B at an earlier stage in the examination than the currently proposed Deadline 5 (10 June 2026), in order to allow sufficient time for the Council and other Interested Parties to review the material.
- Alternatively, if the ExA does not consider it appropriate to request earlier submission of the full suite of documents, request that the Applicant provide the key documents explaining the scope, design changes and principal environmental implications of Scenario B at an earlier deadline, with any consequential updates to the wider documentation submitted at Deadline 5.
- Ensure that Interested Parties are provided with a reasonable period to review and respond to the Scenario B documentation before the close of the examination
- Note the limited time available for the LLFAs' to review the Drainage Strategy due to its submission at Deadline 1 rather than at the application stage.
- Provide an opportunity through the ExA's First Written Questions for the LLFAs' to submit a detailed technical review of the Drainage Strategy.
- Seek the LLFAs' views on how the Drainage Strategy should be secured within the draft DCO, including whether it is suitable to function as an outline drainage strategy.
- Ensure that the additional information identified above is provided and considered before reliance is placed on the Drainage Strategy for the purposes of detailed design at a later stage.

Yours sincerely,



Priscilla Omede

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