

THE INFRASTRUCTURE PLANNING (EXAMINATIONS PROCEDURE) RULES 2010

NORWICH TO TILBURY DEVELOPMENT CONSENT ORDER

PINS REFERENCE EN020027

**WRITTEN SUBMISSION OF ORAL
REPRESENTATIONS MADE ON BEHALF OF
BLOOR HOMES LIMITED AT CAH2**



INTRODUCTION

This is a written submission made on behalf of Bloor Homes Limited in respect of oral submissions made at Compulsory Acquisition 2 on Thursday 30 April 2026.

Individual Site Representations	
Agenda Item 3	<p>Each affected person (AP) who has indicated a wish to speak will be invited in turn by the ExA to speak. Following each submission the applicant will be provided with a right of reply and the ExA may wish to ask the speaker and/ or applicant questions. The ExA will ask the following from each affected person:</p> <ul style="list-style-type: none">a) For an outline of the current scope of objections, taking account of any progress in negotiations with the applicant.b) Whether compulsory acquisition (CA) and or temporary possession (TP) powers (or both) are objected to and (with reference to the statutory tests and applicable guidance) why?c) What relief is sought?d) Whether there are any issues of hardship or requests for non-statutory relief, and if so, the basis for these and any practice precedents.e) Where relevant, whether the Human Rights Act and/ or the Public Sector Equalities Duty are engaged and what considerations emerge from this?
	<p>The current scope of Bloor Homes objection relates to land parcels at Chadwell St Mary. In particular plots 6/71, 6/71a and 6/71b.</p> <p>Bloor has an option over this land and is promoting a planning application for the development of up to 1,500 dwellings, together with education, health and retail uses. The land forms part of a growth area proposed by Thurrock Borough Council for the delivery of up to 4,000 homes, and plays a key role in meeting the Borough's housing delivery targets. The Bloor scheme will be delivered in phases and start on site is anticipated in 2029</p> <p>Taking the parcels in turn:</p>

Land Parcel 6/71a

This is a strip of land adjacent to Brentwood Road (coloured brown and referenced 6/71a in the Land Plans). NGET is proposing a compulsory acquisition of this land to provide its temporary and permanent access¹.

This strip of land will be fundamental to the Bloor scheme as it will contain the proposed access to residential development parcels off Brentwood Road and overlaps with the first area for development adjacent to the site entrance. This strip is excessively wide.

Bloor has sought comfort that NGET will not require the full extent of this land and was hoping for the land plans to be scaled back. Bloor have also sought comfort that it will be able to construct the permanent access and lay services as required and commence building within Area A as shown on the plan appended to the Statement of Common Ground submitted at deadline 1 [REP1-083].

Land Parcels 6/71 and 6/71b

Bloor has concerns regarding the other land coloured brown on the Land Plans, including parcels 6/71 and 6/71b. Should these be fully acquired by NGET, this would have very significant adverse consequences for the Bloor scheme.

It is Bloor's understanding, through discussions with NGET, that a relatively small proportion of the brown land is actually required for

For all 3 parcels, it is Bloor's view that compulsory acquisition is not necessary, and instead Bloor (or the landowner ahead of Bloor's acquisition) could retain the land and grant NGET rights as necessary. Moreover, permanent access to NG apparatus ought to be capable of taking place over the estate roads once constructed.

Negotiations with the Applicant have been positive and the dropping of option A is helpful to Bloor. The Statement of Common Ground ("SoCG"), submitted at deadline 1, records agreement on several key matters, including:

¹ Figure 11.5 of the Design Development Report (**Appendix 12**) refers to this strip as "CSEC (Cable Sealing End Compound) and substation permanent access buffer".

- that NGET will only implement land and property rights to the extent actually required;
- that the NGET permanent access route can be varied to be routed through the Bloor Scheme;
- the broad location for a construction access preferred by both parties to the north of the main access to the residential development;
- an understanding that restrictions on built development in certain areas are not intended to prevent Bloor's enabling works; and a commitment to exploring opportunities for shared facilities and materials.

Bloor objects to both the compulsory acquisition ("CA") and temporary possession ("TP") powers sought by NGET in respect of the Bloor Scheme land, to the extent that these are not reduced in size, changed to temporary or regulated by a binding legal agreement to reflect the commitments given.

c) In terms of the relief being sought

Bloor would still like to see the land plans amended and a commitment to locate the permanent overhead line as far north in the site as possible.

Importantly the commitments set out in the SoCG need to be secured in a legal agreement. Bloor have received heads of terms for such an agreement and understand that the negotiation of the agreement will progress with the aim of completing the same during the Examination.

Taken at face value,, the Land Plans suggest a fundamental constraint to the Bloor scheme which if viewed by prospective purchasers would cause alarm and the ability to secure finance for the purchase of a dwelling. Moreover if the permanent acquisition was simply exercised without regard to the agreed matters then that would remove the access to a strategic housing site.

On item d) Whether there are any issues of hardship or requests for non-statutory relief, and if so, the basis for these and any practice precedents.

Bloor do not make any representations under this head:

e) Where relevant, whether the Human Rights Act and/ or the Public Sector Equalities Duty are engaged and what considerations emerge from this?

The Human Rights Act 1998 is engaged in this case. The compulsory acquisition of Bloor's interest in land engages Article 1 of the First Protocol to the European Convention on Human Rights ("A1P1"), which protects the right to peaceful enjoyment of possessions. The CA Guidance confirms that the Secretary of State must strike a fair balance between the public interest in the compulsory acquisition and the private loss to the person whose land is being acquired.

In respect of the Public Sector Equality Duty under section 149 of the Equality Act 2010, Bloor notes that the Bloor Scheme will deliver a significant quantum of affordable housing and community infrastructure serving a diverse local community. To the extent that the exercise of CA and TP powers delays or reduces the delivery of these benefits, the decision-maker should have regard to the duty to advance equality of opportunity and foster good relations between persons who share relevant protected characteristics and persons who do not.