



PORT OF
TILBURY
LONDON

NORWICH TO TILBURY DCO

PORT OF TILBURY LONDON LIMITED

RESPONSE TO EXAMINING AUTHORITY'S SECOND WRITTEN QUESTIONS

GEN 2.4: All local authorities, and IPs who are listed in the interrelationship report, are asked to:

- *Review the interrelationship report [REP4-296] and confirm if the updated position on approved and proposed developments is, to the best of your knowledge, accurate and to provide any further comments if you wish.*

Port of Tilbury London Limited (PoTLL) has reviewed the updated Interrelationships Report [REP4-296] submitted at Deadline 4, and the updated ES Chapter 17 – Cumulative Effects – Response Update [REP4-163]. PoTLL makes the following observations on accuracy in the Interrelationship Report and adequacy in relation to cumulative assessment.

As set out in PoTLL's response to the Examining Authority's (ExA's) first written questions [REP3-130], the Tilbury3 project did not appear to have been assessed cumulatively due to an error reporting on NGET's own Grain to Tilbury Tunnelling Project rather than Tilbury3. In its response, PoTLL also noted that the application for planning permission for Tilbury3 (25/00598/FUL) had been submitted on 14 May 2025, and that the cumulative assessment should be carried out against the application now it is available, rather than against the limited information available in the Scoping Report under reference (24/01023/SCO).

ES Chapter 17 – Cumulative Effects – Response Update [REP4-163]

The Response Update now includes, at ID TH70, the planning application for Tilbury3. This is listed in the updated Long List. However, TH70 has *not* been progressed for assessment on the basis that the development “was assessed in the original DCO submission” under TH38.

The assessment of TH38 has been updated only minimally. The amendments now refer to Tilbury3 as a “small-scale port development”, (which is not an accurate description of the Tilbury3 major development application) rather than a “small-scale tunnel construction”. Only the assessment of Health and Wellbeing effects has been materially updated.

PoTLL is mindful that its Scoping Report for Tilbury3 (TH38) did not present estimates for key metrics such as the likely construction workforce. The Scoping Report focuses on the baseline data collection and proposed methodology for the numerous environmental topics that were not proposed to be scoped out; for these topics, little-to-no project specific information was included in the Scoping Report.

Complete information is, however, available in the submitted planning application (TH70). A review of the Environmental Statement for Tilbury3 would confirm that it is not at a “small-scale”. Tilbury3 consists of four Development Zones totalling 40.57ha, plus a further 17.39ha of land outside the Development Zones. The construction period, from 2027 to 2031, is anticipated to create 1,688 construction jobs regionally, and contribute nearly £95million GVA to the local economy, plus further contributions to both at a national level.

Whilst the Applicant utilised a 'cut-off' date of 1 April 2025 for the purposes of the cumulative assessment within its Environmental Statement, it is typical for applicants to continuously review planning applications for the purposes of updating that cumulative assessment. It is therefore disappointing that the Applicant has opted not to assess the full planning application for Tilbury3, despite the documents having been publicly available on the Thurrock Planning Portal since the application was accepted on 30 May 2025. A resolution to grant permission for Tilbury3 was made on 24 February 2026; this is the latest status that should be reported in the next iteration of the cumulative assessment.

As set out previously, PoTLL does not anticipate any cumulative effects would arise from Tilbury3 and the Proposed Development; however it is concerned that, by not using the full application for assessment, there is insufficient evidence in Examination for the ExA to rely on this conclusion. By only assessing the limited information in the Tilbury3 Scoping Report, the Applicant has simply not assessed the Tilbury3 development as it is being brought forward, despite the full application documents having been available for almost a year as at Deadline 4.

Interrelationships Report [REP4-296]

The Interrelationships Report [REP4-296] has been updated to list the Tilbury3 Request for a Scoping Opinion (TH38) as a project, stating as its status "EIA required" and for the indicative construction and operation programmes, "Unknown". The full planning application, TH70, is not mentioned in the Interrelationships Report.

PoTLL submits that the request for a scoping opinion (TH38) has been overtaken by the planning application made on 15 May 2025 (TH70). The Interrelationships Report should make reference only to TH70 to avoid confusion.

PoTLL also notes that this would enable the Interrelationships Report to accurately report on the indicative construction phase of Tilbury3 (2027 to 2031) and the indicative start of operation.

Conclusion

PoTLL does not anticipate that any cumulative effects with Tilbury3 will be identified; however, this can only be confirmed through the cumulative assessment being updated to consider the complete environmental information provided with the Tilbury3 planning application (TH70). If this is not done, and the assessment of the information in the Tilbury3 Scoping Report (TH38) is relied upon, it is difficult to see how the ExA could have confidence that an adequate cumulative assessment has been undertaken and that effects will not arise from both projects.

The cumulative assessment of the Tilbury3 project should therefore be updated to consider the complete environmental information submitted with the planning application (TH70).

Additionally, the Interrelationships Report should be updated to refer *only* to the planning application for Tilbury3 (TH70), to avoid misrepresenting the status of the Tilbury3 project.