

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

7 July 2026

Your Reference: EN02007
Interested Party Number: [REDACTED]

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)

Thurrock Council's Submission for Deadline 6

Following receipt of the Rule 8 letter dated 17 February 2026 Thurrock Council is writing to provide a response to the points raised as requirements of Deadline 6, as set out in the final examination timetable attached as Annex A.

- ***written post-hearing submissions; summaries of and responses to oral submissions made at hearings held during week commencing 22 June 2026***

The Council's responses to the action points from the issue specific hearings are attached in Appendix A – Thurrock Council's response to the ExA's Action Points from Issue Specific Hearing 3 and 4.

- ***the applicant's updated documents and application guide***
- ***comments on any further information or submissions received by deadline 5 and 5a including from the applicant, any interested party, and any additional affected person or additional interested party made pursuant to change requests 1 or 2 relating to the 'proposed provisions'***

The Council's response to these points is attached in Appendix B – Thurrock Council's Comments on the Applicants Updated Documents and Deferred ExQ2 Responses.

- ***any further information requested by the ExA under rule 17 of The Infrastructure Planning (Examination Procedure) Rules 2010***

The Council's responses to this point are attached in Appendix C – Thurrock Council's response to Rule 17 Letter dated 30 June 2026.

Yours sincerely,



Interim Major Infrastructure Officer

Email: [\[REDACTED\]@thurrock.gov.uk](mailto:[REDACTED]@thurrock.gov.uk)

Telephone: [REDACTED]

Appendix A – Thurrock Council's response to the ExA's Action Points from Issue Specific Hearing 3 and 4

1. Response to ISH 3 Action Point 9

Schedule 4 (discharge of requirements):

- *as referred to by Suffolk CC, noting its response to the Sea Link DCO (Sea Link examination library reference [REP7-366]), the applicant and all local authorities are to provide a revised draft of Schedule 4 (Discharge of Requirements). This must include provisions enabling the secretary of state to call in any submissions made to a relevant discharging authority which seek to discharge requirements either in whole or in part.*
- *it would assist the examining authority if a collaborative approach could be undertaken by all local authorities with a view to providing a single preferred set of revised wording to Schedule 4 for deadline 6.*

- 1.1 Thurrock Council supports the position set out by Suffolk County Council regarding the proposed amendments to Schedule 4 (Discharge of Requirements).
- 1.2 The Council supports an approach whereby the relevant local authority remains the default discharging authority, with provision for the Secretary of State/DESNZ Unit to recover or call in individual applications for the discharge of requirements where considered appropriate. This would retain the benefits of local knowledge and accountability whilst providing flexibility for national oversight where required.
- 1.3 The Council does not support a mechanism that would allow the Applicant to determine, on a case-by-case basis, which authority should determine an application for the discharge of requirements. Instead, the Council supports the collaborative position advanced by Suffolk County Council and other local authorities seeking a clear, consistent, and proportionate framework for the discharge of requirements.
- 1.4 The Council would also reiterate its points made in its responses to ExQ1 [REP3-088] on Schedule 4:
“The Council supports a consolidated approach to post-consent processes, working collaboratively with DESNZ and the Applicant, while retaining its role as a statutory local planning authority.”

2. Response to ISH 4 Action Point 1

5.1 Mitigation and compensation 1

Provide an update on the progress of the draft section 106 agreement regarding landscape enhancement (a response is sought from both the applicant and all local authorities).

- 2.1 Thurrock Council, together with the other local authorities, remain in discussion with the Applicant regarding the completion of a Section 106 unilateral undertaking to deliver additional landscape planting and enhancement.
- 2.2 The Applicant has identified Tilbury North, within Thurrock and in the vicinity of the proposed Tilbury North substation, as a potential off-site Biodiversity Net Gain (BNG) area.
- 2.3 However, the Council is concerned by the Applicant's position on landscape enhancement and compensation, which was confirmed at ISH 4, that no agreement will be entered into unless it is deemed strictly necessary. The Council considers that landscape compensation measures are required to mitigate the residual landscape and visual effects of the project and to offset the resulting harm experienced by the public.
- 2.4 The Council will continue to engage constructively with the Applicant and the other host authorities with the aim of securing a Section 106 agreement that delivers appropriate landscape enhancement and compensation measures.

Appendix B – Thurrock Council’s Comments on the Applicants Updated Documents and Deferred ExQ2 Responses

1. Comments on the updated Outline Landscape and Ecological Management Plan (OLEMP)

- 1.1 The Council has the following comments on the updated Outline LEMP [REP5-157].
- 1.2 On a positive note, the Council welcomes the inclusion of the text *“a diverse range of species will be used to minimise overall losses from drought or pests and diseases;”* in reference to tree and hedgerow planting as a diverse range of species will also benefit local wildlife.
- 1.3 Additionally, in section 9.5.2 regarding the use of green hay the Council approves of this inclusion. Although, the Council would like this flagged as *“of local providence”* to ensure it fulfils its objective of *“acquiring seed of local provenance.”*
- 1.4 However, the Council is concerned regarding point 10.2.1 regarding *“weed free strip either side of the hedgerow through chemical and/or mechanical control.”* This can be dealt with further in the LEMP, but the Council would require some additional information on what is considered a weed in this context as ground flora is an important part of hedgerows so just the removal of all species would not be beneficial. Additionally, details on the chemical methods should be detailed in the LEMP to make sure they are appropriate.

2. Deferred ExQ2 Responses

2.1 GEN 2.4 – Report on interrelationship with other infrastructure projects

The Examining Authority notes that the latest cut-off date used within the cumulative assessment is currently 31 January 2026 and referred to the Environmental Statement Chapter 17 – Cumulative Effects Response Update [REP4-163] and the Interrelationship Report [REP4-296].

The Examining Authority has requested local authorities and other interested parties to review the updated Interrelationship Report [REP-296] and confirm whether, to the best of their knowledge, the position relating to approved and proposed developments is accurate. The Examining Authority has also invited any further comments on the report where necessary.

- 2.1.1 The Council has reviewed the updated Interrelationship Report [REP4-296] and have the following amendments to make:

ID	Application Reference	Amendment
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TH33/TH37	23/01321/SCO / 23/01501/FUL	Correct application reference is: 24/01501/OUT – approved by planning committee on 10.02.2026
TH58	25/00969/SCR	New application reference is 26/00413/OUT – planning application has been submitted after advice provided
TH59	25/00845/OUT	Decision pending – going to Planning Committee on 06.07.2026

2.1.2 The Council requests the following new application to be added:

Application Reference	Proposal Description	Status
26/00413/OUT	Outline planning application (with all matters reserved except for access) for up to 385 residential dwellings (Use Class C3), provision of public open space, and associated infrastructure.	Pending

2.2 DES 2.5 – Approach to scenarios

The Examining Authority notes the updates provided by the Applicant regarding a number of alternative design scenarios within the Approach to Scenarios document [REP4-310]. However, it remains unclear when a number of the alternative scenarios will be confirmed, including those dependent upon third-party planning applications and other external factors.

The Examining Authority has requested local authorities to review the Approach to Scenarios document [REP4-310], clarify their understanding of those scenarios reliant upon third-party planning applications and provide any further comments relevant to their administrative areas.

2.2.1 The Council has reviewed the Approach to Scenarios document [REP4-310]. The Council is satisfied with the updates to the design scenarios the Applicant has provided.

2.2.2 However, the Council would welcome continued engagement from the Applicant on the scenarios within Section H - Thurrock that are yet to be determined especially those where the Applicant has chosen to “retain flexibility”.

3. Essex Place Services (Archaeology) Comments on behalf of Thurrock Council

Place Services is providing a response to the documents submitted at Deadline 5 with regard to archaeology for Essex County Council (ECC) and on behalf of Colchester, Tendring, Chelmsford, Basildon, Brentwood and Thurrock planning authority areas.

3.1 Comments on Draft DCO (3.1 Draft DCO (Tracked) (Final Issue E) (REP5-061)

- 3.1.1 The revised DCO wording for Requirement 5 (Archaeology) has included a new part (6) which satisfies the recommendations requested by ECC to ensure the delivery of an adequate programme of post-excavation works and publication. The wording of Requirement 5(6) is considered acceptable.
- 3.1.2 The re-worded sections (parts 1 to 3) have tried to incorporate the various requests of the relevant planning authorities to provide suitable re-wording for the DCO. However the result is that the new proposed wording is confusing and does not reflect the proposals put forward by ECC which was to provide a distinction between the undertaking of the archaeological evaluation works and the subsequent mitigation works. This was to facilitate a clear process for the discharge of condition procedures.
- 3.1.3 The DCO wording has been discussed previously with the relevant county archaeological officers, comments were prepared for the Second Hearing regarding Requirement 5 however they were not delivered during the Hearing. It is recommended that the wording provided by Suffolk County Council for the Hearing be adopted rather than repeat or provide alternatives at this stage of the application. Following their rationale would lead to fewer subsections and ensure greater clarity for discharge of conditions.

3.2 Comments on the Outline Archaeological Mitigation Strategy/Outline Written Scheme of Investigation (OAMS/OWSI)

- 3.2.1 A revised version of the outline archaeological mitigation strategy and outline written scheme of investigation (OAMS/OWSI) was provided at Deadline 5 (7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Tracked)(Final issue B) (REP5-161). A number of changes have been made in line with our recommendations. There remains only a few outstanding issues, detailed comments on which have been provided direct to the archaeological consultants as requested. The remaining issues relate to the geoarchaeological investigations, the trial trench proposals and proposed mitigation.

3.2.2 Geoarchaeology

- 3.2.2.1 There is a lack of sufficient detail on the potential methodologies that could be employed as part of the geoarchaeological assessment and mitigation.

- 3.2.2.2 Currently the OAMS/OWSI states:

5.3.24 "The methodology by which the characterisation of deposits with palaeoenvironmental/geoarchaeological potential is achieved will be set out in the relevant DWSI and may include, but not be limited to, mechanical test pitting within archaeological trial trenches and the monitoring of G.I. works"

- 3.2.2.3 Requirement 5 of the DCO states that the detailed WSI (DWSI) need to be in accordance with the OAMS/OWSI. This would necessitate the incorporation of a full range of geoarchaeological investigations that may be required as mitigation in sufficient detail in the OAMS/OWSI. No details on alternative methodologies are provided within the OAMS/OWSI document therefore there is no basis or standards set for the techniques which would be expanded upon in the detailed WSI's.
- 3.2.2.4 Until further geoarchaeological assessment is completed and the impacts understood the most appropriate geoarchaeological methodology for characterisation of the deposits with palaeoenvironmental/geoarchaeological potential is not fully realised therefore the most appropriate mitigation technique has not been determined.
- 3.2.2.5 The main methodology proposed for geoarchaeological mitigation is borehole investigation, adequate detail for this methodology is provided within the OAMS/OWSI.
- 3.2.2.6 In other areas of the scheme where impact may be deeper, such as SUDS, undergrounding of cables or HDD drill pits, a more suitable methodology may be geoarchaeological test pits or geoarchaeological trenches. These methods should allow more suitable recording of geoarchaeological deposits such as buried soils and palaeolandsurfaces that would not necessarily be deeply buried and may have a substantial lateral extent. For the area of the river crossing a geoarchaeological trial trench may be more appropriate as mitigation as this would allow investigation of the full site stratigraphy over a wider area and allow concurrent investigation of potential archaeological remains. It is acknowledged that any deposits of high significance that are located at a significant depth would need to be investigated through borehole survey.
- 3.2.2.7 The agreement of the OAMS/OWSI within the determination period is critical to the undertaking of appropriate and timely archaeological and geoarchaeological mitigation post consent. For the OAMS/OWSI to be considered as a comprehensive outline strategy for geoarchaeological investigation it should include a wider range of potential geoarchaeological methodologies that could be required as mitigation for the scheme.
- 3.2.2.8 At present the methodology for geoarchaeological assessment and mitigation is vague and the OAMS/OWSI does not incorporate the full range of geoarchaeological investigations that could be required as mitigation. The OAMS/OWSI has not been approved and is not yet considered adequate as a control document.

3.2.3 Archaeological evaluation trenching

- 3.2.3.1 The principles and scope of the Phase 2 trial trench evaluation methodology have been agreed previously in discussion with the archaeological consultants. The location of the trenches has been provided directly as digital data and is currently under review. It was previously recommended that the OAMS/OWSI should only identify the general areas for Phase 2 trenching within the Red Line Boundary that would require evaluation due to potential design changes which may impact the

location of the proposed trial trenches. Detailed Phase 2 trenching has been submitted for approval, the trenching should include all areas where project impacts have been identified, including (but not limited to) pylon bases, access roads, SUDS, drainage, pulley locations etc. The trial trenches should be located to target these areas of identified impact as well as any potential archaeological features identified through geophysical survey and/or aerial photography. To assess the proposed trial trench locations the most up to date design information needs to be made available to determine areas of impact. Once this information is provided the trial trench locations can be reviewed. The results of the review will be reported back to the archaeological consultant directly.

3.2.4 Mitigation Areas

3.2.4.1 A number of documents for archaeological mitigation have been submitted at Deadline 5. These include Volume 8: Examination Documents (June 2026):

- 8.21 Detailed Written Scheme of Investigation – Mitigation areas 124, 136 (a & b), 137, 138, 141 & 142 Final Issue A (REP5-220)
- 8.22 Detailed Written Scheme of Investigation – Mitigation areas 126, 128 (a, b & c) & 140. Final Issue A (REP5-221)
- 8.23 Detailed Written Scheme of Investigation – Mitigation areas 109, 110, 111, 112 (a & b) & 139. Final Issue A (REP5-222)
- 8.24 Detailed Written Scheme of Investigation – Mitigation areas 113 (a & b), 114 & 115. Final Issue A (REP5-223)

3.2.4.2 The documents submitted are not acceptable in their current form, further information has been requested directly to facilitate full consideration of the mitigation proposals. The sites proposed for mitigation have not yet been discussed or approved by the archaeological advisor and there has been limited time since submission to consider these documents. It is considered inadvisable to secure mitigation at this stage of the application due to time constraints.

Appendix C – Thurrock Council's response to Rule 17 Letter dated 30 June 2026

1. Response to 2a in socio-economic matters deferred from issue specific hearing 4

Employment and Skills Plan:

a) The ExA asks all local authorities for their comments on the outline ESP [REP5-215], including whether they consider the applicant has adequately addressed the matter of supply chains within the document bearing in mind the number of other Nationally Significant Infrastructure Projects consented in the vicinity of the proposed development. If not, do they suggest any measures the applicant could consider, if any, to address any concerns raised.

- 1.1 The Council's primary concern is that the proposed stakeholder group lacks sufficient influence and authority to shape delivery of the Employment and Skills Plan (ESP).
- 1.2 As currently drafted, there is a risk that stakeholders will simply receive the Final ESP for information and be presented with monitoring reports after activities have taken place, rather than being actively involved in developing, advising on and supporting delivery.
- 1.3 The Council considers that the stakeholder group should have a stronger and more clearly defined role. The Terms of Reference should be updated to reflect this stronger role, and should include the following:
 - Sharing expertise and insights about emerging local priorities and acting as a key consultee, in order to help the Applicant maximise the project's employment, skills and economic opportunities;
 - Supporting the Applicant and its delivery partners in implementing initiatives that achieve the ambitions and targets set out in the ESP;
 - Working collaboratively with partners to develop and deliver initiatives that create sustainable employment and skills outcomes for local communities, strengthen the local economy and maximise supply chain opportunities for local businesses.
- 1.4 Whilst the Outline ESP identifies a number of positive actions and commitments, it still lacks clear key performance indicators, quantified targets and measurable outcomes. The Council would expect the Final ESP to establish targets together with monitoring and reporting arrangements to demonstrate success of its delivery.
- 1.5 Table 2.1 of the Outline ESP [REP5-060] details the types of employment opportunities identified. This is helpful however the plan does not identify the likely scale and timing of specific employment opportunities. The Council requires greater detail on occupation demand by project phase and timescale to enable local authorities and training providers to prepare residents for forthcoming opportunities well in advance of construction.
- 1.6 The Council supports the supply chain commitments set out in the Outline ESP and considers them broadly sufficient for Thurrock's purposes.

1.7 However, given the importance of local procurement and business engagement, the Council would prefer the document to be renamed the “Employment, Skills and Supply Plan” to better reflect the significance of the supply chain element.

2. Response to 2b in socio-economic matters deferred from issue specific hearing 4

b) Views are sought from the applicant, as well as all local authorities, as to whether approval of the submitted document should be secured within the wording of the new requirement (requirement 15) in schedule 3 of the draft DCO [REP5-060] relating to the ESP.

2.1 The approval of the submitted document must be secured by DCO Requirement because while the Applicant has made much of the local employment and skills opportunities of the Project throughout the Application and Examination process, there is significant risk that the Applicant will not have sufficient regard to the local communities most impacted by the Project during the post-consent phase. An approval process in the dDCO Requirement would ensure the Applicant is accountable to the aims stated in the Outline ESP [REP5-215].

2.2 As Thurrock Council's Local Impact Report [REP1-187] identifies at paragraph 6.7.10 and 6.7.17, there is potential for employment opportunities during the construction phase of the N2T project as well as decommissioning activities. Thurrock Council has requested that the Applicant provided a Local Procurement and Skills Framework but the Applicant has declined to do this, most recently in a meeting with the Applicant on 25 June 2026. While Thurrock Council welcomes the Employment and Skills Plan as an alternative, it is not consistent for the Applicant to put forward that the Final ESP will be used to inform workforce planning and related matters (as the Applicant does in paragraph 7.2.2 of the Outline Employment and Skills Plan [REP5-215]) but that this document does not need to be approved by the relevant county planning authority and Thurrock Council.

2.3 Approval of the Plan by the relevant county planning authority and Thurrock Council will enable the authorities to have an active role in determining whether the submitted plan is acceptable before it is implemented and ensures that the proposed strategy is sufficiently ambitious, involves specific local labour, apprenticeship and training commitments. Approval also makes the Applicant more accountable because it requires clear monitoring and reporting arrangements, allows the relevant authorities to reject a plan if it is too vague, unmeasurable or require revisions if circumstances change. Any feedback provided to the Applicant through the approval process would be constructive and specific, with the end goal being an approved ESP.

2.4 Thurrock Council also proposes that submission of the ESP takes place no later than 6 months prior to the commencement of any stage of the authorised development so that the relevant county planning authority and Thurrock Council have sufficient time to meaningfully respond to the submitted ESP.

2.5 The ESP must be comprehensive and recognise local issues and requirements. Thurrock Council would like to work with the Applicant to ensure this is achieved by responding to the submitted ESP through an

approval mechanism in Requirement 15 of the dDCO. Thurrock Council welcomes the Applicant's proposals for the ESP in principle but it is essential that the ESP is not treated by the Applicant as a tick box exercise that only requires submission to the relevant authorities.

3 Thurrock Council's suggested revised wording for Requirement 15 of the DCO

3.1 The Council's proposed amendments to Requirement 15 are as follows with a new 15(3) suggested:

Requirement 15. Employment and Skills Plan

(1) ~~No stage of the t~~The authorised development may ~~not~~ commence until an employment and skills plan (which must be substantially in accordance with the outline employment and skills plan) has been submitted ~~to and approved for approval to~~ **by** the relevant county planning authority and Thurrock Council.

(2) The authorised development must be carried out in ~~general~~ accordance **with the approved any** employment and skills plan submitted further to sub-paragraph (1) unless otherwise agreed with the relevant county planning authority and Thurrock Council.

(3) The employment and skills plan must be submitted to the relevant county planning authority and Thurrock Council for approval no later than six months prior to the commencement of any of stage of the authorised development.