



NORWICH TO TILBURY

EN020027

Comments on Submissions received at Deadline 6

Babergh District Council [REDACTED]

Mid Suffolk District Council [REDACTED]

Deadline 7
21 July 2026

Table of Contents

Glossary of Acronyms	2
Purpose of this Submission	2
Comments on submissions received at Deadline 6	3
Table 1: REP6-073 Outline Code of Construction Practice.....	3
Table 2: REP6-118 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4	5
Table 3: REP5-215 Outline Employment and Skills Plan	6

Glossary of Acronyms

<i>DCO</i>	<i>Development Consent Order</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>

“BDC” refers to Babergh District Council; “MSDC” refers to Mid Suffolk District Council; “BMSDC” refers to BDC and MSDC jointly; “SCC” refers to Suffolk County Council; and “the Councils” refers to BDC, MSDC, and SCC jointly.

Purpose of this Submission

The document has been prepared by Babergh and Mid Suffolk District Councils to respond to the Applicant’s submissions, and where appropriate representations made by other interested parties, received at Deadline 6 (“**D6**”) for Norwich to Tilbury. Examination Library references are used throughout to assist readers.

Comments on submissions received at Deadline 6

Table 1: REP6-073 Outline Code of Construction Practice				
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	BMSDC's Comments	References
1a	Lead officer	REP6-073	BMSDC refer to their submissions at ISH4 and deadline 6 [REP6-135] and reiterate the request for a comprehensive strategy for ongoing compliance monitoring and reporting, plus enforcement and regularisation procedures for all reported complaints and identified non-compliance. This strategy should be in the form of an appendix to the CoCP as it is necessary to ensure compliance for all matters in the delivery of the development. The strategy will provide the basis for a collaborative, proactive and responsive approach to compliance, minimising delays to delivery arising from non-compliance, investigation of complaints and regularisation. The strategy will provide greater stakeholder confidence in the accountability of the Applicant as developer, and clarity for the respective local authorities, and other parties, as enforcing authorities. The strategy will also inform affected communities and businesses as to the expected actions and processes in place to ensure ongoing confidence in the compliant delivery of the	

			development and the swift regularisation of incidents of non-compliance that are considered inevitable for a project of this scale and complexity.	
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Table 2: REP6-118 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4				
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	BMSDC's Comments	References
2a	Lead officer	5.4f	BMSDC notes there remains no mention / assessment of cumulative effects of the project with other reasonably foreseeable developments in the area of Bramford substation, specifically the Alcemi BESS development at Bramford / Bustall. BMSDC note that the examination timetable required the submission of an updated version of the interrelationship report at deadline 7 and will provide any comments on this document at deadline 8	

Table 3: REP5-215 Outline Employment and Skills Plan				
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	BMSDC's Comments	References
3a	Economic Development officer	General	BMSDC were unable to comment on the oESP at deadline 5 and take this opportunity to make comments as the document currently stands. BMSDC reserve the right to make any further necessary comments on this document at deadline 8. Babergh and Mid Suffolk District Councils endorse and support the detailed comments submitted by SCC in relation to the OESP and have the following specific comments to make. The OESP appears well aligned with national infrastructure policy and demonstrates a commitment to generating local economic benefits. Its strengths lie in recognising existing regional skills assets and proposing collaborative working with education providers and employers. The principal implementation risks are: • Shortages of skilled construction and engineering labour. • Competition from other major infrastructure projects. • Difficulty converting local residents into job-ready workers quickly enough. • Supply-chain capacity limitations among local businesses. • The need for strong governance and measurable targets in the final Employment and Skills Plan.	

			From a local economic development perspective, the success of the plan will largely depend on how early National Grid and its contractors engage with partners including colleges, training providers and employers to build workforce capacity before construction reaches peak activity. Whilst appreciating that this is a ‘strategic plan’, many of our current concerns highlight the need for more detail. There is no reference to governance, risk or ongoing management of the ambitions contained within the OESP, it is essential that a clear, robust framework is set out and adhered to, to ensure that the programme meets local identified need and that it delivers significant social value benefits for our residents. <u>Possible workforce shortages - skills available to serve needs of NSIP’s:</u> The Skills Plan states that all parts of the Study Area have a substantial supply of people with vocational and technical qualifications that are relevant to construction, utilities and infrastructure-related employment. The Plan acknowledges that employers continue to report persistent skills shortages, particularly in skilled construction trades, electrical and engineering occupations, and mobile-plant and specialist technical roles. Forecasts highlight strong future demand for these skills, which may be compounded by cumulative pressures arising from multiple NSIPs being advanced across Norfolk, Suffolk and Essex (including Thurrock) with over overlapping time periods. The Plan highlights existing strong local skills assets including further and higher education institutions, specialist construction and utilities training	
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			providers, Skills Bootcamps and employer-led skills initiatives that may address these potential gaps. Section 4.5.3 identifies a strength across the Norwich to Tilbury route in construction but does not identify whether this strength – and therefore demand for labour – can easily be met from the local population. This needs to be assessed as there are already identified shortages of skills arising from existing NSIP's such as Sizewell C and offshore wind. It is likely that Norwich to Tilbury will exacerbate these shortages without careful modelling and actions to specifically address these issues on an area-by-area basis. <u>Need for industry collaboration to be reflected in skills plans – to enable trained staff to move between NSIP's and mitigate potential skills gaps:</u> There is a recently signed MoU between the Energy & Utility Skills Group and the Electricity Transmission Industry Collaboration who have published new workforce research that strengthens their joint commitment to secure the skilled people required to deliver the UK's electricity transmission investment plans including Norwich to Tilbury. However recent research published by the Energy & Utility Skills Group and the Electricity Transmission Industry Collaboration has highlighted that 35,000 vacancies must be filled during the current regulatory period (T3 – 2026-31) across the UK. Critical at-risk roles include high-voltage (HV) design engineers, project managers, electrical fitters, and overhead lines people. It would be good to see more detailed plans for how this will be dealt with on the N to T NSIP – some specific planned actions as opposed to general statements	
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			about existing skills assets and hope. There are already skills gaps emerging through SZC around welding and steel fixing for instance. <u>Plans must explicitly demonstrate how local communities in places like East Anglia (e.g., Norwich to Tilbury and Sea Link projects) will benefit from direct hiring and training</u> The Plan sets out the intention to prepare activities to support skills and employment, but does not provide any detail to enable District specific comment, so detailed workforce data, such as role profiles, skills requirements, workforce numbers and durations are necessary before more detailed feedback can be provided. The plan states that information will include: • preparing a project-specific approach to workforce planning and recruitment in advance of construction (from 2027), informed by engagement with local authorities, employability services and training providers across Norfolk, Suffolk and Essex (including Thurrock); • promoting awareness of project-related jobs, apprenticeships and training opportunities through established local channels, including local authorities, job-brokerage services, further education colleges, Skills Bootcamps and apprenticeship services; would be good to have explicit mention of DWP and Work Coaches. • signposting GGP contractors and supply-chain partners to relevant local apprenticeship, vocational and adult-learning provision to support recruitment and upskilling aligned with project roles;	
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			• encouraging contractors to adopt inclusive and accessible recruitment practices consistent with National Grid’s equality, diversity and inclusion commitments, including the use of open recruitment approaches to reduce barriers for under-represented groups; • supporting engagement with local employability and training programmes that assist people facing barriers to work, where relevant and appropriate; • coordinating employee-volunteering activity, including schools, careers and employability engagement, through National Grid’s existing Volunteering Works programme and equivalent contractor initiatives The plan currently doesn’t make reference to encouraging work experience for school/college students and DWP clients, and we believe that this is an essential part of any final plan. It is essential that there are District specific details so that likely demands for workers and possible opportunities/impacts on the local labour force can be assessed. It is desirable at this stage to have some details to see how recruitment will be tailored to attract staff from each District area along the route showing the link with existing labour market pressures and skills shortages or availability. The role titles listed in the skills plan are a mix but some focus on site management, environmental assessment and skilled construction roles plus entry level/lower skilled – site security, catering, welfare, fencing and admin. The latter roles are often a good match for DWP clients seeking entry level roles, but without details of hat those roles involve (JD’s) this is difficult to assess.	
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			<u>Supply Chain</u> The Skills Plan identifies that Suffolk exhibits higher-than-average concentrations in construction-related, transport and manufacturing activities, and additionally shows a stronger concentration of employment in the electric power generation, transmission and distribution sector than the national average. This indicates that the Suffolk local economy has established supply-chain strengths in key sectors that are relevant to, and could benefit from, the proposed Norwich to Tilbury development. The ability for Babergh and Mid Suffolk supply chain businesses to take advantage of this is dependent upon the availability of a robust and phase-specific evidence base for the development so that supply chain actions can be planned and implemented effectively. We will need a clear understanding of the types of goods and services required, the capacity and capability of businesses within a defined geographic area (Mid Suffolk and surrounding area - hyper-local, local and regional), and the likelihood of these businesses being able to respond to demand across different phases of the Project. The OESP does not provide a sufficiently detailed phase-specific assessment of supply chain requirements, nor does it consider the likelihood or the probability of local and regional supply chain participation. Without this information it is not possible to assess the scale of opportunity or the potential impacts on local business capacity. The OESP identifies potential future activities, it does not identify forecast workforce demand (other than at a very strategic level) and the scale or type of training, employment or supply chain support required. Without this it is not possible to assess whether the	
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			proposed strategic measures will be deliverable or sufficient to address identified/possible skills gaps.	
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