Representation on Policy SS03, Former Arena Essex site and fishing lake, Lakeside

Thurrock Local Plan 2024 to 2044, Regulation 19 Publication Version (August 2026)

Form answers

Representor (Part A, questions 1 and 2): Dr Jackie Lighten, on behalf of Protect Langdon. Address for correspondence: Langdon Hills, Essex. No agent.

Part of the plan (question 3): Policy SS03, Former Arena Essex site and fishing lake, Lakeside [1, pp.77 to 80]. Consequential changes to Policy SP01 [1, p.32], Policy SP03 [1, p.37], paragraphs 4.2.4 and 4.2.17 [1, pp.34, 39], the Policies Map and the Infrastructure Delivery Plan (IDP) [6].

Legally compliant (question 4(1)): No. See section 4.

Sound (question 4(2)): No. The policy is not justified (section 5), not effective (section 6) and not consistent with national policy (section 7).

Why (question 5): section 1 gives the conclusions. Sections 4 to 8 give the grounds, each with its document and page.

Modifications sought (question 6): delete Policy SS03 and the allocation. See section 3.

Participation in the hearings (questions 7 and 8): Yes. See section 9.

Notification: I ask to be notified when the plan is submitted for examination, when the Inspector's report is published and when the plan is adopted.

National policy applied: the National Planning Policy Framework of December 2024 (NPPF) [2], which applies to this examination under the transitional arrangements [17, para 9.1; 32, Annex A para 8].

Authored by Dr Jackie Lighten on behalf of Protect Langdon.

Contents

- Form answers
- Abbreviations
- How to read this representation
- 1. Summary
  - The requests, in one list
- 2. Who is making this representation
- 3. Modifications sought
- 4. Legal compliance
  - L1. Habitats Regulations Assessment
  - L2. Reasonable alternatives
- 5. Justified
  - J1. The allocation is not land of least environmental value
  - J2. The site was not chosen by any comparison of locations for a data centre
  - J3. The Local Wildlife Site assessment promised at Regulation 18 is not in the evidence base
  - J4. The loss of the speedway stadium is not assessed
- 6. Effective
  - E1. The compensation the policy relies on is undefined and outside the borough
  - E2. The grid connection the allocation depends on is unassessed
  - E3. Water and groundwater
  - E4. Further deliverability points
- 7. Consistent with national policy
- 8. Why deletion, and why a lesser change would not work
- 9. Participation in the hearings
- Appendix A. Supporting grounds
  - A1. Critical national infrastructure
  - A2. Green Belt
  - A3. Viability
  - A4. Policy DMP01
  - A5. Transport

    - A6. Generators and air quality
    - A7. Operational carbon
- Appendix B. Maps
- Appendix C. Documents relied on
- Appendix D. Information requests
- Appendix E. Method and limits

Abbreviations

- **CNI:** critical national infrastructure.
- **EDNA:** Economic Development Needs Assessment [7].
- **EIA:** Environmental Impact Assessment.
- **ELAA:** Employment Land Availability Assessment [8].
- **ES:** Environmental Statement, the applicant's assessment for planning application 25/00573/OUT [20].
- **FTE:** full-time equivalent (jobs).
- **GSP:** Grid Supply Point, where the transmission network supplies the local network.
- **GWh:** gigawatt hours (one million kilowatt hours).
- **ha:** hectares.
- **HRA:** Habitats Regulations Assessment [4].
- **IDP:** Infrastructure Delivery Plan [6].
- **IIA:** Integrated Impact Assessment, the plan's sustainability appraisal [3].
- **LoWS:** Local Wildlife Site (the form used in Policy SS10).
- **LWS:** Local Wildlife Site.
- **MW:** megawatts.
- **MWh:** megawatt hours (one thousand kilowatt hours).
- **NPPF:** National Planning Policy Framework [2].
- **OMH:** open mosaic habitat on previously developed land, a priority habitat.
- **SPA:** Special Protection Area, a site protected under the Habitats Regulations.
- **sq m:** square metres.
- **TTG:** Thames Terrace Grassland, grassland on the gravels of the Thames terraces.

How to read this representation

This representation is arranged by the tests the Inspector applies, not by topic.

Each ground has a code: L for legal compliance (section 4), J for justified (section 5) and E for effective (section 6). Section 7 applies national policy to the same grounds. Each ground ends with a “Fails:” line naming the test it fails.

Section 1 gives the conclusions. Sections 4 to 8 give the evidence, each claim with its document and page.

A number in square brackets is a document listed in Appendix C, with the place relied on: [3, p.271] is page 271 of document 3. Page numbers are those of the PDF file unless a printed page is stated.

Supporting points that do not change the outcome are in Appendix A, so that the main grounds are not diluted.

1. Summary

1.1 Policy SS03 allocates about 52 hectares (ha) at the former Arena Essex raceway for a data centre campus on about 27 ha in the eastern part [1, pp.77 to 79]. The allocation includes part of Arena Essex Local Wildlife Site (LWS, reference Th16, 25.9 ha), whose priority habitat is open mosaic habitat on previously developed land (OMH) [14, pp.17 to 18; 3, p.271].

1.2 **What is asked:** delete Policy SS03 and the allocation (section 3).

1.3 **Not legally compliant:**

- **Habitats Regulations.** The HRA screens SS03 in using text written for a town centre site [4, p.221]. It concludes that adverse effects from air pollution on the Thames Estuary and Marshes SPA and Ramsar site cannot be ruled out, and that further evidence is needed "before the plan can be adopted" [4, pp.131 to 133]. Its water quality conclusion relies on a sewerage company that does not serve Thurrock [4, pp.123 to 125; 6, p.61]. (Paragraphs 4.1 to 4.5.)

- **Alternatives.** The IIA tested data centres only as extra land on top of the employment total, not as a choice between locations [3, pp.58 to 59, 146 to 148]. Its appraisal of SS03 repeats text written for a Grays town centre policy [3, p.271]. (Paragraphs 4.6 to 4.8.)

1.4 **Not justified:**

- **Biodiversity.** The IIA says much of the LWS "will be lost to development" [3, p.271]. The applicant's ES says about half the LWS's habitats would be lost, a significant adverse effect, without mitigation, on a site of County importance [20, pp.20, 49]. No mitigation is available for the loss of 7.88 ha of potential TTG [21, para 3.19]. The site's weak Green Belt score records its enclosure by roads and industry, not what the land holds. (Paragraphs 5.1 to 5.9.)

- **National importance, with Natural England's study pending.** Natural England calls the TTG "a nationally important habitat" and expects to publish its strategic study of it "in the coming months" [27, pp.1 to 3]. The plan allocates the site first. (Paragraph 5.9.)

- **No comparison of locations.** The plan calls the data centre "additional growth beyond the EDNA forecasts" [1, para 4.2.4, p.34]. The site entered the plan through the promoter's proposal [8, p.167], and no other location was compared for a data centre, although the plan's own strategy links data centre delivery to the redevelopment of former industrial land [1, p.32] and a second data centre proposal is live in Tilbury [65].

The campus yields about 12 jobs per hectare, against about 69 for the plan's employment land. (Paragraphs 5.10 to 5.15.)

- **The Regulation 18 promise.** The Council said the need to protect LWSs "will be assessed as the proposed allocations are reviewed" [10, p.96]. Apart from the IIA's appraisal, no such assessment is in the evidence base. (Paragraph 5.16.)

- **The speedway stadium.** Sport England asked for "an up to date and objective assessment of speedway needs" [10, p.179]. None is in the plan's evidence base, and the plan does not mention speedway. (Paragraphs 5.17 to 5.19.)

1.5 **Not effective:**

- **Compensation.** Most of the biodiversity net gain would be met outside the borough, at a site Natural England considers likely "too distant" for many of the species affected [23, p.4; 27, p.4]. Compensation for the TTG "has not yet been defined" [21, para 3.20]. (Paragraphs 6.1 to 6.4.)

- **Grid.** The campus would draw power from the transmission network at Barking [24, para 10.2]. No plan document assesses that connection, and the plan's own text records grid headroom limitations at Lakeside while its evidence models only the local network, which the campus would bypass [1, p.23]. The campus would use about 3.5 times the borough's modelled 2022 electricity consumption for buildings and transport [19, p.21; 5, pp.15, 44]. (Paragraphs 6.5 to 6.9.)

- **Water.** Essex & Suffolk Water maintains its objection to the application and records groundwater protection as unresolved [28]. The Council's own water study warned that the undertaker "may not be able to supply new businesses" with large non-domestic demand [63, p.29]. (Paragraphs 6.10 to 6.12.)

1.6 **Not consistent with national policy:** the allocation conflicts with NPPF paragraphs 188 and 192 on land of least environmental value and local wildlife sites, paragraph 104 on sports land, paragraph 86(c) on suitable locations, and paragraphs 27(a) and 87(a) on the grid connection [2]. (Section 7.)

1.7 **Supporting points (Appendix A):** Green Belt release without an identified need for this use; 94 diesel generators unassessed in the plan's evidence; the Council's own viability evidence; Policy DMP01; transport; and operational carbon of about 68% of the borough's total.

1.8 **Why deletion:** the principal grounds cannot be cured by policy wording. The policy places built development in the eastern part of the site [1, p.79], where, on the applicant's ES, the buildings take LWS habitat [20, para 6.238]. Grid and water capacity cannot be created by a policy criterion. (Section 8.)

The requests, in one list

1. Delete Policy SS03 and remove the allocation from the Policies Map (paragraph 3.1).

2. Make the consequential changes to Policies SP01 and SP03, paragraphs 4.2.4 and 4.2.17, the employment land supply and the IDP (paragraph 3.2).

3. Retain Arena Essex LWS under Policy SP07, criterion 3 (paragraph 3.2).

4. If the policy is not deleted, make the six modifications in paragraph 3.3.

5. Require the Council to obtain and publish Natural England's study of Thames Terrace Grassland before the hearing sessions on Policy SS03 (paragraph 5.9).

6. Require the Council to publish Natural England's Regulation 19 response on Policy SS03, and invite Natural England to the hearing session on SS03 or put written questions to it, on the national importance of the site's features, on whether the plan's evidence answers the concern it raised at Regulation 18, and on the compensation the policy relies on (paragraphs 5.5 and 5.16).

7. Hear me at the hearing sessions on Policy SS03 (section 9).

8. Notify me of the plan's submission, the Inspector's report and adoption.

2. Who is making this representation

2.1 This representation is made by Dr Jackie Lighten on behalf of Protect Langdon. It is based on analysis of the Council's evidence base for the plan (83 documents, about 11,500 pages) and the file for planning application 25/00573/OUT on the same site (343 documents, about 6,600 pages). It concerns Policy SS03 only.

3. Modifications sought

3.1 **Main modification:** delete Policy SS03 and remove the allocation from the Policies Map.

3.2 **Consequential modifications:** delete the references to the data centre allocation in Policy SP01 [1, p.32], Policy SP03 [1, p.37] and paragraphs 4.2.4 and 4.2.17 [1, pp.34, 39]; remove the site from the employment land supply and the IDP; and retain Arena Essex LWS under Policy SP07, criterion 3 [1, p.49].

3.3 **Without prejudice to deletion:** if the Inspector does not delete SS03, the following modifications are needed to make it sound:

a) remove Arena Essex LWS (Th16, as mapped in the LWS Register 2022 [14, p.17]) from the allocation boundary and show it on the Policies Map as protected green infrastructure;

b) replace "ecological mitigation required to off-set any loss of the existing on-site Local Wildlife Site" [1, p.78] with a requirement, as in Policy SS10 [1, p.189], that development must not incur significant negative effects on the LWS habitats;

c) require, before planning permission is granted, evidence of a grid connection offer for the campus, of a water supply agreement with Essex & Suffolk Water, of an assessment of emissions from standby generation against air quality standards at sensitive receptors, and of how the scheme will comply with Policy DMP01;

d) require any compensation for open mosaic habitat and Thames Terrace Grassland to be defined, located within Thurrock and secured before planning permission is granted;

e) state in the policy whether the site, or part of it, is removed from the Green Belt (the Policies Map appears to remove the eastern part, but no policy says so) and, if it is, define the new boundary by a permanent physical feature; and

f) require, before submission of the plan, an assessment of speedway and motorsport needs prepared with Sport England and the Speedway Control Bureau, with the policy amended to reflect its result.

4. Legal compliance

L1. Habitats Regulations Assessment

Framework: Conservation of Habitats and Species Regulations 2017, regulation 105.

4.1 The HRA lists SS03 among the policies with **"likely significant effects that cannot be ruled out"** [4, para 5.3, pp.47 to 48] and among 48 allocations within 500 metres of the Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar site, and connected tributaries, that "will need to be considered further at the Appropriate Assessment stage" [4, para 5.83, p.74].

4.2 Its screening entry for SS03 reads: "Yes. This policy will result in development within the town centre and therefore could contribute to significant effects, including increased air pollution, and decreased water quality and quantity" [4, p.221]. **The site is not in a town centre** [1, p.77]. The entry above it on the same page, for a policy of "mixed-use redevelopment within the town centre", uses the same sentence [4, p.221].

4.3 **The appropriate assessment proceeds by impact pathway, not by allocation**; SS03 is not named in it [4, pp.79 to 128]. On air quality it concludes that adverse effects on the Thames Estuary and Marshes SPA and Ramsar site "could not be ruled out at this stage" [4, para 7.4, p.131] and that "additional evidence will be required to inform further HRA before the plan can be adopted" [4, para 7.9, p.133]. The reason it gives is "potential in combination effects due to the LTC", the Lower Thames Crossing [4, para 7.4, p.131]; it does not consider SS03's own sources, including the campus's standby generators (A6), under any pathway, and it does not mention generators.

4.4 On water quality, the HRA's conclusion of no adverse effect holds "providing that the mitigation measures and improvements set out by Southern Water are followed and policy protection measures are implemented and delivered successfully" [4, p.125]. The wastewater measures relied on are Southern Water's, including its plan for the "Gravesend Wastewater System" [4, paras 6.80 to 6.81, pp.123 to 124]. The Council's IDP states that "AWS is the statutory sewerage undertaker for the borough", AWS being Anglian Water Services [6, p.61].

The HRA does not mention Anglian Water. The wastewater limb of the water quality conclusion, which applies to all growth in the plan including SS03, therefore rests on measures by an undertaker that does not serve the borough.

For surface water run-off from allocations within 500 metres of a connected waterway, which include SS03, the HRA recommends construction measures "at the project level" [4, para 6.82, p.124]. **SS03 itself does not include them** [1, pp.78 to 80]; the HRA relies on development management policies for policy protection [4, para 6.83].

4.5 **On the HRA's own conclusions, the integrity test is not yet met for air quality, and the wastewater basis of the water quality conclusion is not supported by the measures it relies on.**

Fails: legal compliance (Conservation of Habitats and Species Regulations 2017, regulation 105).

L2. Reasonable alternatives

Framework: Planning and Compulsory Purchase Act 2004, section 19(5); Environmental Assessment of Plans and Programmes Regulations 2004, regulation 12(2).

4.6 The IIA's employment options add "allocation of land for data centres to support the national agenda" to otherwise identical options (MG3 and HG3) [3, pp.58 to 59]. **The IIA does not compare locations for a data centre.** Its appraisal of those options attributes the significant biodiversity effects to Tilbury 3 and London Gateway and does not mention the Arena Essex LWS [3, p.148].

4.7 The IIA appraises the site itself, policy-off as site option 60981 and policy-on as SS03. ("Policy-off" means the land was scored as a bare site option, before any policy wording was applied; "policy-on" means it was scored again with the requirements written into Policy SS03.) It records a significant negative effect on biodiversity and states: "**the Local Wildlife Site much of which will be lost to development**" [3, pp.267, 271]. It does not test any other location for the data centre use against that effect.

4.8 **The IIA's appraisal of SS03 is in part not an appraisal of this site.** Its heritage paragraph for SS03 says the policy responds "to nearby heritage assets with specific reference included to the cinema and church buildings" and refers to "heritage assets within the town centre" [3, para 6.131, p.271]. SS03 contains no such reference, and the site is not in a town centre [1, pp.77 to 80].

The same error appears in the HRA's screening of SS03 (paragraph 4.2). Two of the plan's statutory assessments describe this site with text written for a Grays town centre policy.

4.9 **The IIA's appraisal of SS03 does not engage with what a data centre is.** On climate change and energy, it records that the objective "was previously scoped out of the appraisal of site options" and gives the policy a minor positive score because the policy requires on-site renewable energy [3, para 6.127, p.270]. **It does not mention the campus's electricity demand or its operational emissions** (Appendix A, A7).

On water, the IIA records “an improved negligible effect” because of open space around the lake and on-site surface water drainage [3, para 6.126, p.270]. **The IIA does not mention mains water demand or the water undertaker’s position** (E3). On the economy, it records a significant positive effect for “the large amount of employment growth it would support” and because the use “will meet national employment needs” [3, para 6.124, p.269]; **the applicant forecasts only about 330 operational jobs which is not a “large amount” to justify the exceptional water and electricity demands of a data centre** (paragraph 5.12).

An appraisal that scores the plan’s largest energy user positively on climate, and a use whose mains water supply the undertaker has refused to commit to as negligible on water, without reference to either demand, has not assessed the likely significant effects of the allocation. A data centre is defined by its electricity demand, and the water undertaker has described this one’s proposed usage as excessive (E3). To score it without reference to either is not a minor omission; it is an appraisal of a different use.

Fails: legal compliance (Planning and Compulsory Purchase Act 2004, section 19(5); Environmental Assessment of Plans and Programmes Regulations 2004, regulation 12(2)); justified.

5. Justified

NPPF paragraph 36(b): “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence” [2].

J1. The allocation is not land of least environmental value

5.1 NPPF paragraph 188 requires plans to “allocate land with the least environmental or amenity value, where consistent with other policies in this Framework”. Paragraph 192(a) requires plans to “Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity” [2].

5.2 The LWS citation records **“a population of the England Red List Endangered Broad-leaved Cudweed (Filago pyramidata) at one of only a few known sites in the UK”, invertebrate surveys with “18 Nationally Rare and 57 Nationally Scarce species”, and an assemblage “likely to be of at least regional importance”** [14, pp.17 to 18].

5.3 **The Council’s appraisals have recorded the risk of loss since 2018:** “Arena Essex Local Wildlife Site at Lakeside … could be lost to development directly or degraded through urban edge effects” [13, appendices p.135; 12, p.376]. The 2026 IIA records the loss [3, p.271].

5.4 **The applicant’s ES rates the LWS of “County” importance** [20, para 6.83, p.20] **and the site’s invertebrate assemblage of “National” importance, noting that Thames Terrace Gravel grassland “only exists within the UK in the tens of hectares”** [20, paras 6.224 to 6.225, p.44]. It states that the development “will result in approximately half of the habitats within the LWS being lost” and that, in the absence of mitigation, the loss of cudweed “due to the siting of the data centre buildings within the eastern extent of the Site” and other impacts “would result in an overall permanent moderate (significant) adverse effect on Arena Essex LWS” [20, paras 6.237 to 6.238, p.49]. Its cudweed mitigation has since been revised, and Natural England now considers the project licensable for that species [21, paras 3.24 to 3.33; 27]; the habitat loss is unchanged.

The ES Addendum assesses the loss of cudweed without mitigation as **“a high magnitude impact and a major adverse effect”** [21, paras 3.9 to 3.17], and for 7.88 ha of potential TTG states: **“No specific mitigation is available to avoid or reduce the permanent loss”** and the residual effect “remains moderate adverse and is considered significant” [21, para 3.19]. On the ES’s own significance matrix, an impact of medium magnitude on a receptor of high sensitivity, which is how the Addendum classes the TTG loss, is “Major” [20, Table 6.3, p.9; 21, para 3.18]. The applicant’s cudweed strategy states that **“It is highly unlikely that the first wave of**

translocation will result in the establishment of new populations" [38, p.16].

5.5 **Natural England's advice describes the TTG as "a nationally important habitat" that "will be directly and permanently lost to development"** [27, pp.1 to 3]. Natural England does not object to the application, subject to compensation being secured. It adds that "a lack of formal objection from Natural England does not mean that there are no significant environmental impacts" [27]. At Regulation 18, Natural England said that "a lack of comment on other matters/allocations does not infer there are no issues" and recorded "concern that several allocation sites overlap with local wildlife sites"; the Council replied that "further consideration and assessment will be carried out as to the location and extent of new growth" [10, p.131]. That assessment is not in the evidence base (paragraph 5.16). I ask the Inspector to require the Council to publish Natural England's Regulation 19 response on SS03, and to invite Natural England to the hearing session on SS03 or put written questions to it, on the national importance of the site's features, on whether the plan's evidence answers the concern it raised in 2023, and on the compensation the policy relies on (request 6).

5.6 The Council's Green and Blue Infrastructure Strategy says very little TTG remains and that its fauna is "increasingly dependent on the network of open habitats that develop on brownfield sites". It sets the strategic focus as "protecting and expanding existing sites, notably those in the Buglife Thames Estuary Important Invertebrate Area" [15, paras 6.13 to 6.14, p.98]. The ES places the site within that area [20, para 6.84].

5.7 **The plan treats LWSs differently in different allocations**. Policy SS10 requires that development "not incur significant negative effects on the LoWS habitats" and that any loss be compensated on site [1, p.189]. Policy SS03 accepts "any loss of the existing on-site Local Wildlife Site", to be off-set [1, p.78].

5.8 The LWS Register records the site's condition as "Moderate, declining" [14, p.18]. **Declining condition is a matter for management, which the plan could secure; it does not make the site land of least environmental value.** The plan allocates, for a single use, a LWS of County importance with Endangered flora and a regionally important invertebrate assemblage, where the applicant's own assessment records a significant adverse effect and no available mitigation for the loss of nationally important habitat.

The Council's own Site Selection Methodology rules out, at its suitability stage, sites with "constraints that cannot be overcome, i.e. there is no appropriate mitigation" [9, p.16]. The applicant's statement that "No specific mitigation is available" for the loss of 7.88 ha of potential TTG [21, para 3.19] meets that description. **The site was not ruled out.**

5.9 **The site's features are of a quality that Natural England itself calls nationally important, and its own study of that habitat is pending.** The applicant's ES rates the invertebrate assemblage of "National" importance [20, para 6.225, p.44]. Natural England describes the Thames Terrace Grassland on the site as "a nationally important habitat" and states: "Natural England has prepared a strategic study into TTG, which we expect to publish in the coming months. The result of that study has informed our position and advice to the Arena Essex proposals" [27, pp.1 to 3]. **The plan allocates the site before that study is published: the plan's evidence does not refer to it, the examination cannot see what Natural England has seen, and the Council's evidence does not assess the national importance that Natural England and the applicant's own ES record.**

Allocating a site of that quality for a single use, in advance of the statutory body's own assessment of the habitat, is not a justified strategy. The allocation should not proceed while that assessment is pending.

The Green Belt scoring does not answer this. The Stage 2 Green Belt Assessment finds that the land "performs more weakly against purpose (c) due to its relative enclosure by existing urban uses" [39, p.43]; it is bounded by the A13, the A126, Arterial Road West Thurrock and the M25 [39, p.41]. That measures how far the land checks the spread of built-up areas. It does not measure what the land holds. The "grey belt" test asks only whether land contributes strongly to Green Belt purposes (a), (b) or (d) and whether it carries one of the assets listed in footnote 7 of the NPPF [2, Annex 2; 66, p.12]. A Local Wildlife Site is not a footnote 7 asset, so the test never asks about it. Land enclosed on every side by roads and industry scores weakly on this test whatever lives on it, because the test asks about the land's surroundings, not its contents; nothing in the method looks at habitat or species except through the footnote 7 constraints. The assessment itself limits what its findings mean. Grey belt status is provisional and the footnote 7 assets are for the Council to review [66, p.94]; "Suitability in terms of sustainability, deliverability, infrastructure and wider site-specific or strategic planning considerations has not been taken into account in the recommendations" [66, p.95]; and "Confirmation of grey belt status will not necessarily equate to land being allocated for development or released from the Green Belt" [66, p.5]. **A weak Green Belt score is therefore not evidence of low environmental value.**

NPPF paragraphs 188 and 192 require the plan to establish that separately. Paragraph 148's priority for previously developed land decides which Green Belt land to release once release is justified; it does not displace them, and open mosaic habitat on previously developed land is a priority habitat precisely because it occurs on land of this kind. The nationally important invertebrate assemblage and Thames Terrace Grassland described above are exactly what the Green Belt scoring leaves out (A2 sets out the Green Belt points in full).

Fails: justified; consistent with national policy (NPPF paragraphs 188 and 192).

J2. The site was not chosen by any comparison of locations for a data centre

5.10 **The Economic Development Needs Assessment (EDNA) does not include land for data centres in its requirement** "in the same way that land for laboratories and logistics" is included, and says such sites "should be considered as additional sites" [7, paras 5.34 to 5.35, pp.72 to 73]. The plan allocates SS03 on that basis, as "additional growth beyond the EDNA forecasts" [1, para 4.2.4, p.34]. **The allocation is therefore not supported by any quantified local need; it stands or falls on whether the site is suitable.**

5.11 **"Critical national infrastructure" is a security designation, not evidence of need (Appendix A, A1).** The designation announced on 12 September 2024 concerns Government support "in the event of critical incidents" [45]; it identifies no need for land in Thurrock and no location.

5.12 **The allocation yields few jobs for the land it takes.** The applicant forecasts "approximately 330 direct Full-Time Equivalent (FTE) operational jobs" [24, para 9.13, p.29] on a campus of about 27 ha [1, p.77]: about 12 jobs per hectare. The plan's employment requirement of 245.65 ha is to "support nearly 17,000 additional fulltime equivalent jobs" [1, para 4.2.15, p.38]: about 69 jobs per hectare. Per square metre, 330 jobs in up to 134,500 sq m of floorspace is about 408 sq m per job; the EDNA assumes 73.5 sq m per job for warehousing (Use Class B8), the use class SS03 gives the campus [7, p.49; 1, p.78]. (Arithmetic: 330 / 27; 17,000 / 245.65; 134,500 / 330.) The EDNA itself says that for data centres "requirements for land are not determined by, or as strongly linked to, operational employment levels to the same extent as other sectors of the economy" [7, para 5.34, p.49]. That is the point: the IIA's significant positive score for the economy rests on "the large amount of employment growth it would support" [3, para 6.124, p.269], a claim the Council's own EDNA says does not fit this use (paragraph 4.9).

The applicant also forecasts 590 to 1,280 jobs including indirect and induced effects, and high value per job [24, pp.28 to 29]. Those wider effects are not tied to this location. **The local employment benefit set against the loss of the LWS is small for the land used.**

5.13 The Site Selection Methodology bases employment sites on the Employment Land Availability Assessment (ELAA) [9, pp.16 to 18]. The ELAA graded the site on the promoter's data centre proposal, recording "Assurance provided on viability, not expected to be speculative development" [8, pp.67, 167]. It states that "a full review of service and utility connections for each site falls outside the scope of this assessment" [8, para 6.19, p.63].

5.14 The applicant's ES records that Thurrock was preferred partly for a "Supportive local government and policy framework for strategic employment development", and that the site's position within an emerging employment allocation "distinguishes it from alternatives and

supports its selection" [18, paras 3.76, 3.79, pp.27 to 28]. **A supportive council is not a planning reason for choosing a site. The applicant chose Thurrock partly because the emerging plan supported it, and the plan allocates the site because the promoter proposed it; each rests on the other, and neither tests the location against alternatives.** It said that "In considering alternative locations, none were identified that could meet the combined requirements for scale, deliverability, infrastructure readiness, environmental suitability, and alignment with the Applicant's commercial requirements" [18, para 3.78]. Its documented Site Assessment, of July 2026, searched only within about 12 kilometres of Barking Grid Supply Point, is dated July 2026, after the site had been carried through Regulation 18 and the ELAA, and is not part of the evidence base [22, paras 2.25, 4.5 to 4.7].

5.15 **There is no documented comparison of locations for a data centre in the plan's evidence base.** The plan says the EDNA "emphasises that future planning for employment land must consider not only quantitative need but also qualitative and locational requirements" [1, para 4.2.16, p.38]; that is a general point about employment land, not a locational need for a data centre here. **The Council's own Viability Assessment states: "We are aware of other sites coming forward in Thurrock for the development of data centres"** [46, para 7.79, p.139].

None is compared with this one. National policy asks plans to identify "suitable locations" for data centres [2, para 86(c)]; **suitability is what J1, E1 and E2 show the evidence does not establish.**

The plan's own strategy offers other routes, and none was tested. Policy SP01 provides for "the redevelopment of approximately 450 hectares of former industrial land" to accommodate employment floorspace, enable port expansion "and to support the delivery of nationally important data centres", and directs growth first to "the reuse of suitable and viable previously developed land" [1, p.32]. Policy DMP08 supports "major operations such as data centres" within designated Employment Areas [1, p.310]. **No evidence base document tests whether that former industrial land, or any designated Employment Area, could accommodate the campus before Green Belt land and a Local Wildlife Site were allocated.**

Other locations are live. The plan itself refers to the "Havering Data Centre" across the borough boundary [1, p.279]. On 6 August 2026 the Council consulted the Environment Agency on a request for an EIA scoping opinion for "a proposed data centre and ecology park" on land off Dock Road, Tilbury (reference 26/00894/SCO) [65, p.1]. The Viability Assessment's "other sites coming forward in Thurrock" [46, para 7.79, p.139] are therefore real, and the Council's own ELAA records a further site, Dansand Quarry at Stanford Road (61002), where "Potential for data centre being explored (B8)" [8, p.167]. The Dock Road site lies within the Tilbury Flood Storage Area [65, p.1]; these sites are cited to show that other locations and demand exist in the borough, not as preferred alternatives. **None was compared with this one.**

The Site Selection Methodology says that deliverability of the preferred employment sites "is set out with the IDP, Viability Assessment and Transport Assessment" [9, p.18]. For SS03, the IDP has n**o electricity supply item** (paragraph 6.8), the **Viability Assessment finds its data centre typology unviable** (Appendix A, A3) and the T**ransport Assessment models the site as general employment** (Appendix A, A5).

Fails: justified; consistent with national policy (NPPF paragraph 86(c)).

J3. The Local Wildlife Site assessment promised at Regulation 18 is not in the evidence base

5.16 **At Regulation 18 the plan proposed "a new employment site"** at Arena Essex "suitable for all employment uses", stating that consideration "would need to be given as to how the recently ratified local wildlife site on part of the proposed employment site impacts on this site and how it could be designed into a development" [11, p.34]. **No data centre was proposed.** In response to an objection on the LWS, the Council said: "The presence of and need to protect Local Wildlife Sites will be assessed as the proposed allocations are reviewed" [10, p.96]. **They have not been.**

Apart from the IIA's appraisal [3, p.271], the **published evidence base contains no assessment of the LWS for this allocation.** I have asked the Council for any such assessment (Appendix D).

The ELAA records the promoter's account that the Local Wildlife Site "encroaches on the developable area" and that **"investigations have again been undertaken"** [8, p.77]. **Those investigations are not in the evidence base.** The data centre use was not in the Regulation 18 plan, which proposed general employment [11, p.34]; the December 2023 Initial Proposals was the Regulation 18 consultation [1, p.12]. **This consultation is the first in which the public and the statutory bodies have been able to comment on a data centre at this site.**

Fails: justified.

J4. The loss of the speedway stadium is not assessed

5.17 The site is the former Arena Essex raceway, a speedway and stock car stadium [11, p.34; 48, p.15]. NPPF paragraph 104 provides that "Existing open space, sports and recreational buildings and land … should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision …; or c) the development is for alternative sports and recreational provision, the

benefits of which clearly outweigh the loss" [2, para 104].

5.18 At Regulation 18, **Sport England's** response, as summarised by the Council, was that the proposed allocation "**must be informed by an up to date** and objective assessment of speedway needs, given the site's historic use", that "the council should engage with the Speedway Control Bureau on the preparation of the needs assessment", and that the Coventry Speedway Stadium appeal decision "is worth reviewing" [10, p.179]. The Council's response: "The recommendation to prepare an assessment of speedway needs is noted and appeal decision will be reviewed" [10, p.179]. **No assessment of speedway needs is in the evidence base.**

The plan, the IIA, the IDP and the Open Space Assessment do not mention speedway. The applicant's own documents record the Council's resolution of 25 January 2023 "to use the Local Plan process to support the retention of Speedway in Thurrock" [48, para 2.4.3, p.15]; the plan does not mention it. The applicant's consultant accepts that paragraph 104 "is applicable" and that the loss "does require some justification" [48, pp.15, 38]. That document is the applicant's, concludes that the use is "demonstrably surplus to requirements" [48, para 4.4.6], and is not part of the plan's evidence base; it is not the up to date and objective assessment that Sport England asked the Council for.

The stadium closed in 2018 [10, p.17; 48]. Paragraph 104 applies to land last used for sport as much as to land in use, as the applicant's own consultant accepts [48, p.15].

Paragraph 104(a) still requires an assessment showing the land surplus. The 2018 needs study the applicant relies on justified the loss by replacement sports facilities, a cycling velopark and a lido [49, p.5], which the data centre scheme does not provide.

5.19 The plan's own Policy DMP33(B) permits the loss of facilities "currently or last used for the provision of community, leisure and cultural activities" only where one of four tests is met, the first being that "The facility is no longer needed for any of the functions that it can perform" [1, p.348]. SS03 applies none of them to the stadium.

Fails: justified; consistent with national policy (NPPF paragraph 104).

6. Effective

NPPF paragraph 36(c): “deliverable over the plan period” [2].

E1. The compensation the policy relies on is undefined and outside the borough

6.1 Policy SS03 relies on “ecological mitigation required to off-set any loss of the existing on-site Local Wildlife Site” [1, p.78]. **On the evidence, the loss is to be compensated, not mitigated.**

6.2 **Biodiversity net gain.** The applicant’s strategy records an on-site loss of 245.18 habitat units, “a reduction of 48.99%”, to be met mainly at a habitat bank at Prior’s Farm, Fingringhoe, outside Thurrock, whose uplift of about 203.94 units “alone **would not meet the indicative deficit against the statutory 10% target**, which is approximately 295.23 habitat units”; it states that **“the availability of suitably extensive and ecologically appropriate land capable of supporting large-scale OMH creation within the borough is highly constrained”** [23, pp.4, 17]. Natural England questions the export of credits to Fingringhoe, “some distance from the zone of impact”, stating that “it seems likely that the site is too distant so as to be outside the range of many species affected by the project” [27, p.4].

6.3 **Thames Terrace Grassland.** The applicant’s September 2025 ES Addendum, since overtaken, said: **“Due to the specific geological requirements of this habitat, this habitat will not be compensated and will be permanently lost as part of the Proposed Development”** [35, para 1.5.4, p.23].

It now accepts that “bespoke compensation is required” for the permanent loss of 7.88 ha of potential TTG and states that “the detailed compensation scheme has not yet been defined” [21, para 3.20]. Natural England says the package “will be agreed with Natural England following consent, but prior to works commencing”, upscaled for time lag [27].

6.4 **A policy whose acceptability depends on habitat credits that Natural England considers likely too distant for the species affected, and on TTG compensation not yet defined, is not shown to be deliverable.**

Fails: effective; consistent with national policy (section 7.3).

E2. The grid connection the allocation depends on is unassessed, and the plan records a constraint at Lakeside

6.5 Policy SS03 requires a campus "which has secure grid access" [1, p.79]. The plan states that managing demand from "major energy users (e.g. data centres) is critical. Grid headroom limitations affect growth areas including Lakeside, Tilbury, and South Ockendon" [1, para 2.4.28, p.23].

6.6 The Energy Strategy says data centres "will place additional pressure on the local electricity network" [5, p.14], that **"the modelling does not account for demand from high energy use sectors, such as data centres"** [5, pp.26 to 27], and that "Future estimated peak electricity demand was not available for this study and therefore 2050 substation capacities have not been assessed" [5, p.37]. **Its statement that "There is sufficient capacity currently"** [5, p.37] **is about the local distribution network without data centre demand.**

6.7 The applicant's ES gives the campus's consumption at full capacity as 2,747,136 megawatt hours (MWh) a year [19, Table 5.18, p.21], an average load of about 314 megawatts. The Energy Strategy's modelled consumption for the borough's buildings and transport is 789 gigawatt hours (GWh) a year in 2022, projected to reach 1,350 GWh in 2050 [5, pp.15, 44].

The campus alone would be about 3.5 times the 2022 figure and about twice the 2050 figure. (Arithmetic: 2,747 GWh divided by 789 and by 1,350. Annual energy, not peak; the Energy Strategy has no peak figures.)

6.8 The applicant says the campus will be supplied by "a high-voltage connection to the national electricity grid substation in the Barking area" and "avoids drawing power from the local distribution network" [24, para 10.2], assessed "on a GSP connection assumption" (GSP: Grid Supply Point) [25], and that Barking "emerged as the only connection point that gave sufficient confidence, at that stage, that capacity might credibly be available" [22, para 4.5]. **On the applicant's own case, the Energy Strategy's assessment of the local network does not address the campus. No document in the evidence base mentions Barking Grid Supply Point or assesses a transmission connection or cable route for SS03.**

The IDP mentions the data centre only under digital connectivity [6, p.78], and its four schedules contain no electricity supply item for SS03 [6]. No connection offer is evidenced in the plan's evidence or the application. The connection lies outside Thurrock; NPPF paragraph 27(a) asks plans to take "a consistent approach … to planning the delivery of major infrastructure, such as … utilities" across boundaries [2], and no statement of common ground on it is listed on the Council's evidence base page (checked 7 October 2026).

The Regulation 18 Consultation Statement records National Grid's responses, as a duty to cooperate body, on three other allocations: Chadwell St Mary, Southfields and Tilbury [10, p.130]. It records none on SS03. Its only record of a cross-boundary discussion of data centres is a meeting with the London Borough of Havering at which both authorities recognised "the pressure these uses can place on Green Belt land" [10, p.35]. **No engagement with the transmission owner, or with any London borough, on a connection at Barking is recorded anywhere in the evidence base.**

6.9 The plan requires "secure grid access" for a load larger than the borough's modelled consumption. Its own text records grid headroom limitations at Lakeside and names data centres as the demand to be managed [1, para 2.4.28, p.23], yet its evidence models only the local network, which the campus would bypass (paragraph 6.8). No document assesses the transmission connection the campus would rely on, and nothing shows that it exists or can be delivered.

Fails: effective; consistent with national policy (NPPF paragraphs 27(a) and 87(a)).

E3. Water and groundwater

6.10 **Essex & Suffolk Water objected to the application on 28 August 2025.** It said the site is in a water resource zone classified as seriously water stressed and that its 2024 pre-planning response stated it **"would not permit a connection capable of supplying the proposed volume of mains water"**; that response has since expired and a new enquiry was required [28]. **On 13 August 2026 it maintained its objection**, recording that information on groundwater protection had not been provided; the site lies in Source Protection Zones 1, 2 and 3 of one of its abstractions [28].

The applicant states that cooling would be air-based [25]. The plan's evidence contains no agreement with the water undertaker on supply to, or groundwater protection at, this allocation.

6.11 **The Council's own water evidence anticipated the problem.** The Water Cycle Study Scoping Report (March 2024) records that Essex & Suffolk Water forecasts a supply deficit in its Essex resource zone without new measures [63, p.27], and that a legally binding target requires non-household supply to fall by 9% by 2038. It concludes: "ESW may not be able to supply new businesses with treated water should they require significant non-domestic water supplies to operate", and "the potential to supply water for these developments is uncertain" [63, p.29]. **It recommended a detailed Water Cycle Study to investigate water neutrality for non-domestic development** [63, p.29].

No detailed study followed. The scoping report is the only Water Cycle Study document in the published evidence base. The IDP relies on it as "The Thurrock Water Cycle Study (2024)" and measures growth in dwellings [6, pp.74, 77]. The Site Selection Methodology nonetheless lists a "Water Cycle Study" among the evidence that informed the final selection of employment sites [9, p.18]. Essex & Suffolk Water's Water Resources Management Plan 2024 commits it to "reduce business water demand by 9% by 2038" [64, p.6].

6.12 **The Environment Agency describes the site as "of high environmental sensitivity"**: two public water supply abstraction boreholes lie 350 and 430 metres to the north-east, Source Protection Zone 1 clips the north-eastern boundary, and Zones 2 and 3 "include the eastern third of the site" [62, p.2], where the policy places the buildings [1, p.79]. The Agency does not object to the application, subject to conditions on contamination [62, p.1]. **The plan allocates a use whose proposed mains water volume the undertaker has refused to commit to, over a public supply aquifer, without any assessment of supply or of groundwater protection in its own evidence.**

Fails: effective.

E4. Further deliverability points (Appendix A)

6.13 Three further matters go to deliverability and are set out in Appendix A so as not to lengthen the main grounds: **the Council's own Viability Assessment finds its data centre typology unviable and then discounts its own method (A3); SS03 requires compliance with Policy DMP01, and nothing tests whether a campus using 2,747,136 megawatt hours a year can (A4); and the Council's highways officers' advice that the access junctions are over capacity remains unresolved (A5).**

Fails: effective.

7. Consistent with national policy

7.1 **Paragraphs 188 and 192.** See J1. The plan does not safeguard the LWS and accepts its loss in principle [1, p.78].

7.2 **Paragraphs 86(c) and 87(a)** support identifying suitable locations for data centres and the grid connections they need [2]. They presuppose that the plan has tested the location's suitability and considered the grid connection; this plan has done neither (J1, E2).

7.3 Paragraph 193(a), which applies when determining applications, sets avoidance by "locating on an alternative site with less harmful impacts" before mitigation and compensation [2]. At plan stage, the choice of allocation is where avoidance is possible; SS03 goes directly to compensation (E1).

8. Why deletion, and why a lesser change would not work

8.1 **Redrawing the campus within the allocation does not avoid the LWS**: the policy places built development in the eastern part of the site [1, p.79], and on the applicant's ES the data centre buildings there take LWS habitat and cudweed [20, para 6.238]. Policy wording cannot create grid or water capacity (E2, E3). Modification 3.3(a), which would take the LWS out of the allocation, is put forward without prejudice: on the ES's own layout the campus could not then be built as proposed, which is why deletion is the primary request.

Compensation after consent is not avoidance (E1). The matters that wording could address, the speedway assessment, the Green Belt boundary, generator emissions and DMP01 compliance, are covered by paragraph 3.3 if the allocation is kept.

8.2 **Deletion does not leave the plan short of employment land.** The plan's requirement is 245.65 ha [1, para 4.2.15, p.38]; the employment land quanta in Policy SP01 total about 591 ha [1, p.33]; and the plan describes the data centre as "additional growth beyond the EDNA forecasts" [1, para 4.2.4, p.34].

9. Participation in the hearings

9.1 I wish to take part in the hearing sessions on Policy SS03. The grounds raise technical questions on ecology, grid capacity and the HRA that the Inspector will need to test with the Council.

Appendix A. Supporting grounds

These points support the main grounds. Each is sourced in the same way. They are placed here so that the main grounds are not diluted.

A1. Critical national infrastructure

Policy SS03 describes the campus as "defined as critical national infrastructure" [1, p.78], and the plan says data centres "are recognised as critical national infrastructure" [1, para 4.2.4, p.34]. **No document in the evidence base explains what that status means for plan-making.** The designation, announced by the Department for Science, Innovation and Technology on 12 September 2024, "will allow the government to support the sector in the event of critical incidents", for example through "a dedicated CNI data infrastructure team of senior government officials who will monitor and anticipate potential threats" [45].

It concerns security and resilience once data centres exist. It does not identify a need for land in Thurrock, or say where data centres should go. **In the Council's site evidence the phrase first appears in the promoter's consultation:** "Consultees supported the inclusion of the site as a Tier 1 employment area … and considered that the proposals aligned with the need for data centres as critical national infrastructure" [8, p.77].

A2. Green Belt

NPPF paragraph 145 says Green Belt boundaries "should only be altered where exceptional circumstances are fully evidenced and justified" [2]. The site is in the Green Belt [8, p.167; 18, para 3.79]. **The plan's case for exceptional circumstances rests on "the scale of housing and employment growth required"** [1, para 4.2.6, p.34].

SS03 provides no housing, and the plan describes the data centre as "additional growth beyond the EDNA forecasts" [1, para 4.2.4, p.34]. **No evidence quantifies the need for this use or tests other locations for it** (J2).

The Stage 2 Green Belt Assessment (sub-area PF-03) rates the land as performing weakly against the Green Belt purposes, identifies it as provisional grey belt and recommends it for further consideration [39, pp.42 to 44]. That addresses harm to the Green Belt. It does not address need, and the weak rating is not evidence of low environmental value: that point is made in full under paragraph 5.9. The same assessment records that removal of the sub-area "would constitute irregular sprawl of the settlement of Thurrock Core over the Arterial Road and result in an irregular Green Belt boundary, undermining the surrounding Green Belt's role with regards to safeguarding the countryside from encroachment", while concluding that release in

isolation “is not likely to harm the wider Green Belt” [39, p.43]; the first finding bears on the undefined boundary in paragraph 3.3(e).

NPPF paragraph 147 requires the authority to demonstrate that it “has examined fully all other reasonable options for meeting its identified need for development” [2]; no need for this use is identified (ground J2), and no options for meeting it were examined. The new inner boundary, the assessment says, “would require strengthening” [39, p.44]. The Policies Map appears to remove the eastern part of the site from the Green Belt, but Policy SS03 does not say so, Policy SP03 does not list it among the Green Belt amendments, and no new boundary is defined [1, pp.37, 77 to 80].

Paragraph 147(a) asks whether the strategy “makes as much use as possible of suitable brownfield sites and underutilised land” [2, para 147]. The plan’s own Policy SP01 associates the delivery of data centres with the redevelopment of about 450 hectares of former industrial land [1, p.32] (paragraph 5.15). Releasing Green Belt for the use before that land is tested inverts the order paragraph 147 requires.

A3. Viability

NPPF paragraph 36(c) requires allocations to be deliverable. The Council’s Viability Assessment tested a data centre typology (EMP_GF_6: 50 ha, 150,000 sq m [46, p.136]) and states: “The sole typology shown to be unviable is designed to be representative of a large data centre” [46, para 7.78, p.139], recording a deficit of £44,351,508 [46, Table 7.27, p.136]. It then says that its method “does not fully capture the unique economic drivers of this sector”, that data centre viability is “driven by power-capacity availability, connectivity infrastructure and specialised operational requirements”, and that the evidence for testing it “may be significantly less robust” [46, paras 7.78 to 7.79, p.139].

The only viability evidence for the allocation is therefore evidence the Council itself discounts, and the factor it says drives viability, power capacity, is the one the plan has not assessed (E2). The typology was tested as greenfield [46, p.136], although SS03 anticipates “potential land contamination from former landfill” [1, p.79].

A4. Policy DMP01

SS03 requires the campus to comply with Policy DMP01 [1, p.79]. DMP01 requires new buildings to “generate renewable energy on-site to at least match annual energy use” or, where that is “not technically feasible”, to maximise on-site generation and offset the shortfall at “£1.35 per kWh” [1, pp.298 to 299]. The applicant’s annual electricity use at full capacity is 2,747,136 megawatt hours [19, Table 5.18, p.21]. **Matching that on site is not in prospect, and the offset at the policy price would be about £3.7 billion** (arithmetic: 2,747,136,000 kWh

multiplied by £1.35), to buy solar generation "elsewhere in the plan area" [1, p.299]. **No evidence base document considers how SS03 and DMP01 fit together. The policy is not shown to be effective for its largest energy user.**

A5. Transport

At scoping, the Council's highways officers advised that "The access arrangements currently on the A1036 are over capacity at peak times and any intensification of use will severely adversely affect the free flow and safe movement of traffic in this area" [50, p.42] (the reference is to the A1306). On 14 August 2026 the Council's highways recommendation on the application remained "Further information required" [53, p.1].

The plan's own Strategic Transport Model has no data centre land use type and models site 60981 as general employment [52, pp.29, 81]. T**he allocation's transport effects have not been tested as a data centre.**

A6. Generators and air quality

The application proposes "94 diesel backup generators" [40, para 4.35, p.13]. For emergency operation the applicant models a maximum hourly nitrogen dioxide contribution off site of 2,347 micrograms per cubic metre, 1,173% of the air quality standard, which it classes as "Substantial", adding that such impacts "are not expected to be significant in reality due to the rare occurrence of prolonged power outages" [40, Table 4.24, p.55; para 4.95]. The Council's environmental protection officer nevertheless stated: "I do not consider it appropriate to allow these impacts to remain unmitigated" [41, p.4]; the applicant's consultant considers emission controls "not warranted" [44, p.2]; and in August 2026 the officer's concerns "still stand" [43].

The plan, the IIA, the HRA and the IDP do not mention generators. The HRA's air quality conclusion for the Thames Estuary and Marshes SPA and Ramsar site is already uncertain (ground L1); the emissions of 94 generators within 500 metres of a connected tributary were not part of it.

A7. Operational carbon

Plans should "take a proactive approach to mitigating and adapting to climate change" and help "shape places in ways that contribute to radical reductions in greenhouse gas emissions" [2]. The applicant's operational emissions are 568,727 tonnes of carbon dioxide equivalent a year [19, para 5.84, p.21], about 68% of Thurrock's total emissions in 2023 of 836 thousand tonnes [42, p.10]. **The plan allocates the site without weighing this**. The IIA scores SS03 minor positive on climate change and energy because the policy requires on-site

renewables, having scoped the objective out at the site option stage [3, para 6.127, p.270] (paragraph 4.9). (Arithmetic: 568,727 divided by 836,000. The applicant's figure assumes full capacity and its stated grid emissions factor.)

Appendix B. Maps

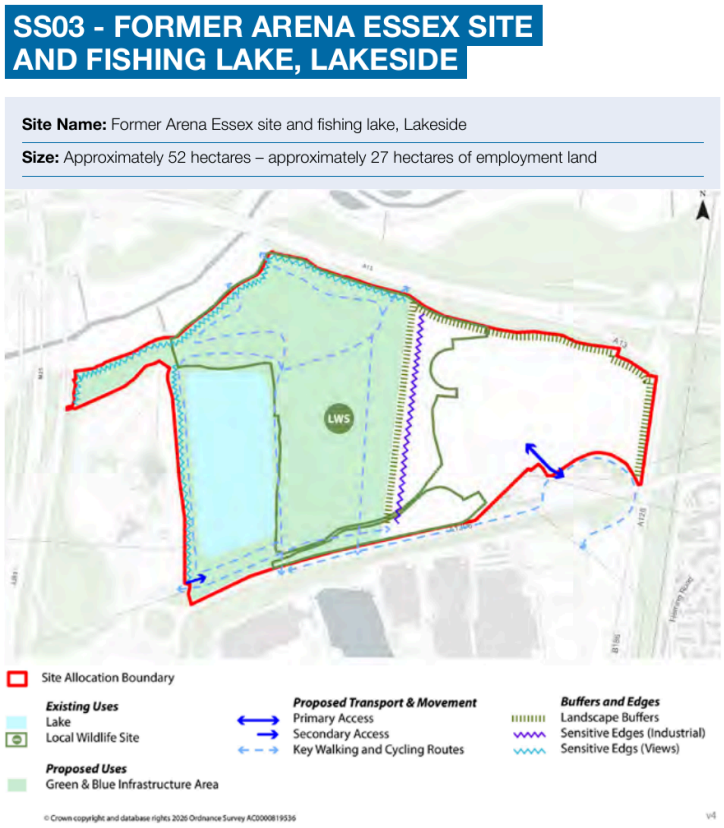


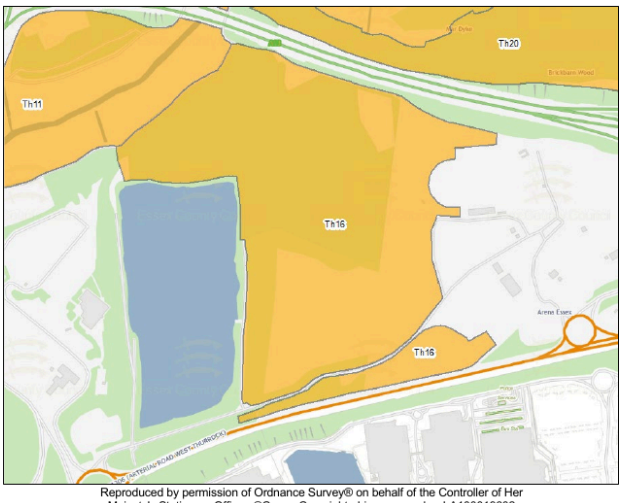
Figure B1. Policy SS03 site map, reproduced from the plan [1, p.77]. The Local Wildlife Site outline is shown in the centre of the site and, in part, within the unshaded eastern area where built development is to be focused.

Site reference: Th16 **Site name:** Arena Essex, West Thurrock	**Grid ref. (approx. centre of site):** TQ582796 **Site area:** 25.9ha

LoWS Selection Criteria:

- HC27 – Post-industrial Sites
- SC1 – Vascular Plants
- SC19 – Important Invertebrate Assemblages

Boundary Map



Reproduced by permission of Ordnance Survey® on behalf of the Controller of Her Majesty's Stationery Office. ©Crown Copyright. Licence number LA100019602

Site Description

This site is a former industrial site that now supports a mosaic of calcareous grassland and open vegetation within scrub and young woodland. More mature trees mark the location of Oak Wood, which may have been Ancient, but has been extensively damaged by motorsport activity. The site includes a number of substrates and a complex topography, including a prominent south-facing bank and seasonally wet hollows.

The calcareous grassland is formed on base-rich clay soils and so cannot be considered to be Lowland Calcareous Grassland Priority habitat. It is predominantly herb rich as a result of the physical impact of recreational activity, with only a few areas achieving a mature grass dominated sward in the absence of regular disturbance. Species present include Marjoram (*Origanum vulgare*), Viper's Bugloss (*Echium vulgare*), Ploughman's Spikenard (*Inula conyzae*), Yellow-wort (*Blackstonia perfoliata*), Fairy Flax (*Linum catharticum*), Blue Fleabane (*Erigeron acris*), Wild Basil (*Clinopodium vulgare*), Rough Hawkbit (*Leontodon hispidus*), Bulbous Buttercup (*Ranunculus bulbosus*), Meadow Crane's-bill (*Geranium pratense*), Mouse-ear Hawkweed (*Pilosella officinarum*), Common Knapweed (*Centaurea nigra*), Common Bird's-foot-trefoil (*Lotus corniculatus*), Red Bartsia (*Odontites vernus*), Wild Strawberry (*Fragaria vesca*), Agrimony (*Agrimonia eupatoria*), Wild Carrot (*Daucus carota*), the Essex Red List species Carline Thistle (*Carlina vulgaris*) and Hound's-tongue (*Cynoglossum officinale*), and the England Red List Near Threatened species Common Cudweed (*Filago germanica*).

The site (and other parts of the motorsport complex to its east) supports a population of the England Red List Endangered Broad-leaved Cudweed (*Filago pyramidata*) at one of only a few known sites in the UK. The

Figure B2. Arena Essex LWS (Th16) boundary map and citation, reproduced from the LWS Register 2022 [14, p.17]. The citation adds that "other parts of the motorsport complex to its east" also support Broad-leaved Cudweed.

Appendix C. Documents relied on

Each entry gives the document, where it was published and the pages relied on in this representation.

Council evidence and Cabinet papers

[1] Thurrock Local Plan 2024 to 2044, Regulation 19 Publication Version, August 2026.
Thurrock Council. Pages relied on: 12, 23, 32 to 34, 37 to 39, 49, 77 to 80, 189, 279, 298 to 299, 310, 348. Paragraphs: 4.2.4, 4.2.6, 4.2.15, 4.2.16, 2.4.28. Link

[2] National Planning Policy Framework, December 2024.
Ministry of Housing, Communities and Local Government. Paragraphs: 86(c), 104, 147. Link

[3] Integrated Impact Assessment, July 2026 (LUC).
Thurrock Council and consultants. Pages relied on: 58 to 59, 146 to 148, 267, 269 to 271. Paragraphs: 6.124, 6.126, 6.127, 6.131. Link

[4] Habitats Regulations Assessment, July 2026 (LUC).
LUC for Thurrock Council. Pages relied on: 47 to 48, 74, 79 to 128, 131 to 133, 221. Paragraphs: 5.3, 5.83, 7.4, 7.9, 6.80 to 6.81, 6.82, 6.83. Link

[5] Thurrock Energy Strategy, 7 July 2026 (Arup).
Thurrock Council. Pages relied on: 14 to 15, 26 to 27, 37, 44. Link

[6] Infrastructure Delivery Plan, July 2026, and Schedules 1 to 4.
Arup for Thurrock Council. Pages relied on: 61, 74, 77 to 78. Link

[7] Economic Development Needs Assessment, August 2025.
Consultants for Thurrock Council. Pages relied on: 49, 72 to 73. Paragraphs: 5.34 to 5.35. Link

[8] Employment Land Availability Assessment, June 2025 (AspinallVerdi).
AspinallVerdi for Thurrock Council. Pages relied on: 63, 67, 77, 167. Paragraphs: 6.19. Link

[9] Site Selection Methodology, July 2026.
Thurrock Council. Pages relied on: 16 to 18. Link

[10] Local Plan Initial Proposals Regulation 18 Consultation Report, 2026.
Thurrock Council. Pages relied on: 17, 35, 96, 130, 179. Link

[11] Local Plan Initial Proposals Document, December 2023.
Thurrock Council. Pages relied on: 34. Link

[12] Initial Proposals Integrated Impact Assessment Appendices, November 2023.
Thurrock Council. Pages relied on: 376. Link

[13] Integrated Sustainability Appraisal and appendices, December 2018.
Thurrock Council. Pages relied on: 135. Link

[14] Thurrock Local Wildlife Sites Register 2022 (Place Services).
Place Services for Thurrock Council. Pages relied on: 17 to 18. Link

[15] Thurrock Green and Blue Infrastructure Strategy, 2022/23 Update, Final report, February 2023 (LUC).
Thurrock Council. Pages relied on: 98. Paragraphs: 6.13 to 6.14. Link

[17] Cabinet report, Thurrock Local Plan Regulation 19 Version, 26 August 2026.
Thurrock Council. Paragraphs: 9.1. Link

[63] Thurrock Water Cycle Study Scoping Report, March 2024 (AECOM).
AECOM for Thurrock Council. Pages relied on: 27, 29. Link

Planning application 25/00573/OUT (Thurrock Council planning register)

[18] ES Chapter 3, Proposed Development, Demolition, Construction and Alternatives, April 2025.
Thurrock Council planning register (document published 12 May 2025). Pages relied on: 27 to 28. Paragraphs: 3.76, 3.78, 3.79. Link

[19] ES Chapter 5, Climate Change and Greenhouse Gases, April 2025.
Thurrock Council planning register (document published 12 May 2025). Pages relied on: 21. Paragraphs and tables: 5.84, Table 5.18. Link

[20] ES Chapter 6, Ecology, April 2025.
Thurrock Council planning register (document published 12 May 2025). Pages relied on: 9, 20, 44, 49. Paragraphs and tables: 6.238, 6.83, 6.224 to 6.225, 6.237 to 6.238, 6.84, 6.225, Table 6.3. Link

[21] ES Addendum, July 2026.
Thurrock Council planning register (document published 20 Jul 2026). Paragraphs: 3.19, 3.20, 3.24 to 3.33, 3.9 to 3.17, 3.18. Link

[22] Site Assessment, July 2026, version 3.
Thurrock Council planning register (document published 20 Jul 2026). Paragraphs: 2.25, 4.5. Link

[23] Biodiversity Net Gain Strategy Report, July 2026.
Thurrock Council planning register (document published 24 Jul 2026). Pages relied on: 4, 12, 17. Link

[24] Planning Supporting Statement, April 2025.
Thurrock Council planning register (document published 02 Jun 2025). Pages relied on: 28 to 29. Paragraphs: 10.2, 9.13. Link

[25] Applicant's note, 13 November 2025.
Thurrock Council planning register (document published 13 Nov 2025). Link

[27] Natural England, consultation response, 28 August 2026.
Thurrock Council planning register (document published 03 Sep 2026). Pages relied on: 1 to 4. Link

[28] Essex & Suffolk Water, consultation responses, 28 August 2025 and 13 August 2026.
Thurrock Council planning register (document published 02 Sep 2025). Link (28 August 2025). Letter of 13 August 2026, document published 14 Aug 2026: Link

[35] ES Addendum, September 2025 (published on the register 9 October 2025).
Thurrock Council planning register (document published 09 Oct 2025). Pages relied on: 23. Paragraphs: 1.5.4. Link

[38] Broad-leaved Cudweed Mitigation Strategy, Appendix 1, July 2026.
Thurrock Council planning register (document published 20 Jul 2026). Pages relied on: 16. Link

[39] Stage 2 Green Belt Assessment, Appendix 4.11 to 4.15, 2026.
Arup for Thurrock Council. Pages relied on: 41 to 44. Link

[40] ES Chapter 4, Air Quality, April 2025.
Thurrock Council planning register (document published 12 May 2025). Pages relied on: 13, 55. Paragraphs and tables: 4.35, Table 4.24. Link

[41] Thurrock Council Environmental Health, consultation response, 29 July 2025.
Thurrock Council planning register (document published 29 Jul 2025). Pages relied on: 4. Link

[42] Thurrock Local Plan Climate Change Strategy, January 2026.
Thurrock Council. Pages relied on: 10. Link

[43] Thurrock Council Environmental Health, consultation response, 24 August 2026.
Thurrock Council planning register (document published 24 Aug 2026). Link

[44] Applicant's air quality consultant response, dated 24 October 2025 (published 13 November 2025).
Thurrock Council planning register (document published 13 Nov 2025). Pages relied on: 2. Link

[45] Department for Science, Innovation and Technology, press release, Data centres to be given massive boost and protections from cyber criminals and IT blackouts, 12 September 2024.
DSIT. Link

[46] Thurrock Local Plan Viability Assessment, 2026.
AspinallVerdi for Thurrock Council. Pages relied on: 136, 139. Paragraphs and tables: 7.79, 7.78, 7.78 to 7.79, Table 7.27. Link

[48] Sport and Active Recreation Needs Assessment (application document), 2025.
Thurrock Council planning register (document published 02 Jun 2025). Pages relied on: 15, 38. Paragraphs: 2.4.3. Link

[49] Sport and Active Recreation Statement with appended 2018 needs study and appeal decision (application document).
Thurrock Council planning register (document published 03 Jun 2025). Pages relied on: 5. Link

[50] EIA Scoping Opinion with consultee responses (application Appendix 1.3), 2024.
Thurrock Council planning register (document published 12 May 2025). Pages relied on: 42. Link

[51] Local Plan Transport Assessment, August 2026 (Arup).
Arup for Thurrock Council. Link

[52] Strategic Transport Model Forecasting Report, June 2026 (City Science).
City Science for Thurrock Council. Pages relied on: 29, 81. Link

[53] Thurrock Council Highways, consultation response, 14 August 2026.
Thurrock Council planning register (document published 14 Aug 2026). Pages relied on: 1. Link

[54] Applicant's Transport Assessment, Part 1, April 2025.
Thurrock Council planning register (document published 12 May 2025). Link

[62] Environment Agency, consultation response, 16 July 2025.
Thurrock Council planning register (document published 16 Jul 2025). Pages relied on: 1 to 2. Link

[65] Environment Agency, response to EIA scoping request 26/00894/SCO (land off Dock Road, Tilbury), 4 September 2026, as filed on the 25/00573/OUT register.
Thurrock Council planning register (document published 04 Sep 2026). Pages relied on: 1. Link

[66] Stage 2 Green Belt Assessment, Main Report, February 2026.
Arup for Thurrock Council. Pages relied on: 5, 12, 94, 95. Link

Statutory undertakers and national documents

[64] Essex & Suffolk Water, Water Resources Management Plan 2024, October 2024.
Essex & Suffolk Water. Pages relied on: 6. Link

[32] National Planning Policy Framework, August 2026, Annex A.
Ministry of Housing, Communities and Local Government. Paragraphs and tables: Annex A para 8. Link

Appendix D. Information requests

Four requests under the Environmental Information Regulations 2004 were sent on 1 October 2026 and acknowledged: Thurrock Council, Natural England, Essex & Suffolk Water and the National Energy System Operator. Replies are due on 29 October 2026, after the close of consultation. I will provide them for the examination if they bear on these grounds.

Appendix E. Method and limits

Note 1. Grid comparison (paragraph 6.7). Inputs: the applicant's annual unregulated electricity consumption at 100% capacity, 2,747,136 MWh [19, Table 5.18, p.21]; the Energy Strategy's modelled annual electricity consumption for Thurrock's buildings and transport, 789 GWh (2022) and 1,350 GWh (2050) [5, pp.15, 44].

Method: 2,747,136 MWh = 2,747 GWh; 2,747 / 789 = 3.48; 2,747 / 1,350 = 2.03; 2,747,136 MWh / 8,760 hours = 313.6 MW average. Limits: annual energy only (no peak figures exist in the Energy Strategy); the applicant's figure is at full capacity, which the applicant describes as its reasonable worst case [25]; the borough figure excludes industrial process demand not covered by Table 3.1 of the Energy Strategy.

Note 2. Areas (paragraphs 1.1, 5.4). Taken from the documents as stated, not measured: allocation about 52 ha and campus about 27 ha [1, p.77]; LWS 25.9 ha [14, p.17]; "approximately half of the habitats within the LWS" lost [20, p.49]; 7.88 ha potential TTG [21, para 3.19]; OMH baseline 13.53 ha and on-site loss of 245.18 units (48.99%) [23, pp.12, 17]. No map overlay was made; the allocation boundary in digital form has been requested from the Council (Appendix D).