

Tees CCPP Project

The Tees Combined Cycle Power Plant Project

Land at the Wilton International Site, Teesside

Applicant's Comments on Redcar and Cleveland Borough Council's Additional Responses to the Examiner's Written Questions

Examination Deadline 3

The Planning Act 2008 (as amended)



Applicant: Semcorp Utilities (UK) Limited
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GLOSSARY

Abbreviation	Description
AGI	Above Ground Installation
AIL	abnormal indivisible loads
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AOD	above ordnance datum
AQMA	Air Quality Management Areas
ASI	Accompanied Site Inspection
BAT	Best Available Techniques
BCA	Bilateral Connection Agreement
BCA	Bilateral Connection Agreement
CAA	the Civil Aviation Authority
CCR	Carbon Capture Readiness
CCS	Considerate Constructors Scheme
CCS	Considerate Constructors Scheme
CEA	cumulative effects assessment
CEMP	Construction Environmental Management Plan
CEMS	Continuous Emission Monitoring System
CEMS	Continuous Emission Monitoring System
CHP	Combined Heat and Power
CL	Critical Load/Level
CoCP	Code of Construction Practice
ConsAg	Construction Agreement
CTMP	Construction Traffic Management Plan
CTMP	Construction Transport Management Plan
DCO	Development Consent Order
dDCO	draft Development Consent Order
DMRB	Design Manual for Roads and Bridges
EA	Environment Agency
EA	Environment Agency
EM	Explanatory Memorandum
EMF	electromagnetic fields
EN-1	National Policy Statement for Energy
EPC	Engineering, Procurement and Construction
ES	Environmental Statement
ES	Environmental Statement
FRA	Flood Risk Assessment
GLVIA3	Guidelines for Landscape and Visual Impact Assessment, Third Edition
HER	Historic Environment Record
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
HRSG	heat recovery steam generator
HSE	Health and Safety Executive

Abbreviation	Description
IAQM	Air Quality Management
ICNIRP	International Commission on Non-Ionising Radiation Protection
IEMA	Institute of Environmental Management and Assessment
LAQM	Local Air Quality Management
LSE	likely significant effects
LVIA	landscape and visual impact assessment
MMP	Materials Management Plan
NCA	National Character Areas
NE	Natural England
NE	Natural England
NGET	National Grid Electricity Transmission Plc
NGG	National Grid Gas
NO ₂	nitrogen dioxide
NO _x	nitrogen
NPS	National Policy Statement
NPS	National Policy Statement
NTS	National Transmission System
NTS	National Transmission System
PA 2008	Planning Act 2008
PEC/CL	Predicted Environmental Concentration/Critical Load
PEIR	Preliminary Environmental Impact Report
RCBC	Redcar and Cleveland Borough Council
SNR	Strategic Road Network
SPA	Special Protection Area
SPD	Supplementary Planning Document
SWMP	Site Waste Management Plan
SWMP	Site Waste Management Plan
TA	Transport Assessment
TRA	Transmission Related Agreement
TRA	Transmission Related Agreement
TVWT	Tees Valley Wildlife Trust
WFD	Water Framework Directive

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1 INTRODUCTION

Overview

- 1.1 This document has been prepared on behalf of Sembcorp Utilities (UK) Limited ('SCU' or the 'Applicant') in respect of its application (the 'Application') for a Development Consent Order (a 'DCO'). The Application was accepted for examination by the Secretary of State (the 'SoS') for Business, Energy and Industrial Strategy on 18 December 2017. The Examination began on 10 April 2018.
- 1.2 SCU is seeking a DCO for the construction, operation and maintenance of a new gas-fired electricity generating station with a nominal net electrical output capacity of up to 1,700 megawatts ('MW') at ISO conditions (the 'Project' or 'Proposed Development'), on the site of the former Teesside Power Station, which forms part of the Wilton International Site, Teesside.
- 1.3 A DCO is required for the Proposed Development as it falls within the definition and thresholds for a 'Nationally Significant Infrastructure Project' (a 'NSIP') under Sections 14 and 15(2) of the Planning Act 2008 ('PA 2008').
- 1.4 The DCO, if made by the SoS, would be known as the 'Tees Combined Cycle Power Plant Order' (the 'Order').

SCU

- 1.5 SCU provides vital utilities and services to major international process industry customers on the Wilton International site on Teesside. Part of Sembcorp Industries, a Singapore-based group providing energy, water and marine services globally, Sembcorp Utilities UK also owns some of the industrial development land on the near 810 hectares (2,000 acre) site which is marketed to energy intensive industries worldwide.
- 1.6 SCU owns the land required for the Proposed Development.

The Project Site

- 1.7 The Project Site (the 'Site') is on the south west side of the Wilton International Site, adjacent to the A1053. The Site lies entirely within the administrative area of Redcar and Cleveland Borough Council ('RCBC') which is a unitary authority.
- 1.8 Historically the Site accommodated a 1,875 MW Combined Cycle Gas Turbine power station (the former Teesside Power Station) with the ability to generate steam for utilisation within the wider Wilton International site. The Teesside Power Station ceased generation in 2013 and was demolished between 2013 and 2015.
- 1.9 SCU has identified the Site, based on its historical land use and the availability of natural gas supply and electricity grid connections and utilities as a suitable location for the Project. In summary, the benefits of the Site include:
- brownfield land that has previously been used for power generation;
 - on-site gas connection, supplied from existing National Grid Gas Plc infrastructure;
 - on-site electrical connection, utilising existing National Grid Electricity Transmission infrastructure;
 - existing internal access roads connecting to a robust public road network;
 - availability of a cooling water supply using an existing contracted supply (from the Wilton Site mains) and existing permitted discharge consent for effluent to the site drainage system
 - screening provided by an existing southern noise control wall, approximately 6 m in height;
 - potential for future Combined Heat and Power ('CHP') and Carbon Capture and Storage ('CCS'); and
 - existing services, including drainage.

1.10 A more detailed description of the Site is provided at Chapter 3 'Description of the Site' of the Environmental Statement ('ES') Volume 1 (Application Document Ref. 6.2.3).

The Proposed Development

1.11 The main components of the 'Proposed Development' are summarised below:

- **Work No. 1** - a natural gas fired electricity generating station located on land within the Wilton International site, Teesside, which includes the site of a former CCGT power station, with a nominal net electrical output capacity of up to 1,700 MWe at ISO Conditions; and
- **Work No. 2** - associated development comprising within the meaning of section 115(2) of the 2008 Act in connection with the nationally significant infrastructure project referred to in Work No. 1.

1.12 Please refer to Schedule 1 of the Draft DCO (Application Document Ref. 2.1) for more detail.

1.13 It is anticipated that subject to the DCO having been made by the SoS (and a final investment decision by SCU), construction work on the Project would commence in around the second half of 2019. The construction of the Project could proceed under one of two scenarios, based on SCU's financial modelling, as follows:

- **'Scenario One'**: two CCGT 'trains' of up to 850 MW are built in a single phase of construction to give a total capacity of up to 1,700 MW; and
- **'Scenario Two'**: one CCGT train of up to 850 MW is built and commissioned. Within an estimated five years of its commercial operation the construction of a further CCGT train of up to 850 MWe commences.

1.14 The above scenarios have been fully assessed within the ES.

1.15 A more detailed description of the Project is provided at Schedule 1 'Authorised Development' of the draft DCO (Application Document Ref. 2.1) and Chapter 5 'Project Description' of the ES Volume 1 (Application Document Ref. 6.2.5).

The purpose and structure of this document

1.16 This document forms part of a package of documents submitted by the Applicant for Deadline 3 of the Examination. It sets out the Applicant's comments on Redcar and Cleveland Borough Council's ('RCBC') additional responses to the Examiners ('ExA') written questions – see Section 2 of this report.

2 THE APPLICANT'S COMMENTS

- 2.1 The Applicant's comments on the RCBC's additional responses to the ExA's written questions are set out in Table 2.1 on the following pages.

Table 2.1 – Applicant's comments

Question No. (Ref. No.)	ExA's Question	RCBC Response	Responsibility	Applicant's comments
1.3.40	Req. 29. [APP-005] addresses employment and skills. Should it be extended to support local tendering as part of a local economic benefit requirement?	This would appear to be beneficial and would support the supply chain opportunities.	SCU WBD	<p>Please refer to the Applicant's Response to Examining Authority's Written Questions (Application Document Ref: 8.6) submitted at Deadline 2 of the Examination.</p> <p>The Applicant and RCBC have agreed the broad outline of a Section 106 agreement which is currently being re-drafted by RCBC.</p> <p>The Section 106 includes provision to ensure opportunities for local businesses by providing a monetary contribution to RCBC Supplier Development programme which aims to deliver events, workshops and coaching sessions to local businesses to achieve the requisite standards to supply the Developer and its primary contractors with goods and services.</p> <p>On this basis, the Applicant does not believe the requirement needs to be extended as it does not need to duplicate something secured by planning obligation.</p>
1.4.1	Table 13.1 of the Environmental Statement (ES) [APP-055] indicates that mitigation measures such as skills and training programmes would promote local employment. Are skills and training programmes appropriately addressed through the DCO [APP-005]?	Requirement 29 of the draft DCO requires the submission of an employment and skills plan detailing arrangements to promote employment and skills development opportunities associated with the development. This providing it is agreed with the LPA and implemented by the developer is considered to be acceptable. The Council is also in discussions with the developer regarding potential for a Sec106 agreement that will include provisions relating to training and employment.	SCU WBD	No comments from the Applicant.
1.4.2	As set out in paragraph 13.14 of the ES [APP-055] Policy CS4 of the Redcar and Cleveland Borough Council (RCBC) Core Strategy states that the Council will 'develop energy industries...focused on hydrogen and renewable energy'. The applicant also states that the project is not renewable but is lower in emissions than traditional coal fired power stations. Please comment on the project's compliance or otherwise with Policy CS4.	It is accepted that the proposed development is not focused on hydrogen or renewable energies, however policy CS4 is not limited to these in relation to energy projects. Policy CS4 is a spatial strategy policy that relates to the South Tees Employment Area, part of which includes Wilton International and therefore the application site. It is therefore considered that the development as proposed is in accordance with the spatial strategy for the area.	DWD	No comments from the Applicant.
1.4.3	As set out in paragraph 13.16 of the ES [APP-055] Policy CS10 of the Core Strategy concerns steel, chemical and port related industries. The applicant considers that the proposed use is of a similar classification as those identified within Policy CS10. Please comment on the project's compliance or otherwise with Policy CS10. Can the applicant also update Table 5.4 of the Planning Statement [APP-036] which omits reference to Policy CS10.	Policy CS10 does relate to steel, chemical and port related activities. It is acknowledged that the proposed development does not fall under one of these broad classifications, however it is accepted that the site was previously developed as a power station and therefore the form of development proposed has been present at the site previously. It is also considered that the site is of a comparable classification in terms of industrial buildings to those present across the Wilton site. The scheme also has the potential to supply and support existing chemical developments on Wilton while also providing for future developments at the site. The development is therefore considered to broadly comply with policy CS10 of the LDF.	DWD	No comments from the Applicant.
1.4.5	Paragraph 13.18 of the ES [APP-055] states that the site is within the Tees Valley Enterprise Zone. Please explain the implications of this for the proposed development.	The developer would benefit from Capital Allowances.	All	Please refer to the Applicant's Response to Examining Authority's Written Questions (Application Document Ref: 8.6) submitted at Deadline 2 of the Examination.

Question No. (Ref. No.)	ExA's Question	RCBC Response	Responsibility	Applicant's comments
				The Site is not located within an Enterprise Zone. The statement at paragraph 13.18 of the ES [APP-055] is incorrect.
1.4.6	Does the Council accept the assumptions made in paragraph 13.44 of the ES [APP-055] regarding the multipliers for indirect and induced jobs?	The Council have no objection to the assumptions set out in paragraph 13.44 of the ES.	ERM	No comments from the Applicant.
1.4.8	How will contractors and sub-contractors be actively encouraged to adopt local procurement policies as set out in paragraph 13.82 of the ES [APP-055]? Is encouragement enough? Paragraph 13.85 states that the EPC contractor will be incentivised to procure locally/regionally. How would this be secured.	The draft Dco under requirement 29 requires the developer to prepare an employment and skills plan detailing arrangements to promote employment and skills development opportunities associated with the development. This will be prepared in partnership with the Council's Economic Growth Team. It is considered that encouragement is the limit and the Council can not enforce or require local resources to be utilised. Partnerships with other major projects have been fruitful in engaging with local employers and potential workforce.	SCU WBD	No comments from the Applicant.
1.4.9	The applicant recognises the importance of recruitment campaigns reflecting the skills set of the surrounding area and intends to work with RCBC's Routes to Employment Service to maximise local opportunities as set out in paragraph 13.108 of the ES [APP-055]. Would Req. 29 [APP005] address the matter adequately?	Through the preparation and development of the employment and skills plan, RCBC Routes to Employment Team can provide a service to the developer to support local recruitment including screened relevant CV's specific to the sector. It is therefore considered that requirement 29 addresses the matter adequately.	SCU WBD	No comments from the Applicant.
1.4.10	The applicant intends to develop a policy to manage tendering and subcontracting for service and supply contracts to source personnel locally as set out in paragraph 13.111 of the ES [APP-055]. How would this be secured through the DCO [APP-005]?	The Council do not consider that this is a matter to be addressed through the DCO. It is appreciated that the developer expects that the general servicing of the plant will be supplied by predominantly from local companies, however it is recognised that this is not always possible.	SCU	No comments from the Applicant.
1.4.14	Paragraph 13.75 of the ES [APP-055] indicates that the regional economy would benefit from the creation of 98 jobs during the construction of the scheme in a single phase and paragraph 13.101 indicates a net employment gain of 247 jobs during the operational phase. Set out the extent to which this assessment is agreed by the Council, identifying any areas where you disagree with the analysis and providing reasons. In the Council's Relevant Representation [RR-008] reference is made to 80 permanent jobs. Please explain the basis of this comment.	The details relating to job creation set out in the ES are considered to be acceptable along with the multiplier set out in the ES. The Council in its original submission did reference 80 jobs however this was based on the information available at the time. The uplift in jobs numbers is considered to be positive position.	WBD	No comments from the Applicant.

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