

Net Zero Teesside Project

Planning Inspectorate Reference: EN010103

Land at and in the vicinity of the former Redcar Steel Works site, Redcar and in Stockton-on-Tees, Teesside

The Net Zero Teesside Order

Document Reference: 9.9 – Applicants’ Comments on Local Impact Reports

Planning Act 2008



Applicants: Net Zero Teesside Power Limited (NZN Power Ltd) & Net Zero North Sea Storage Limited (NZNS Storage Ltd)

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GLOSSARY

Abbreviation	Description
Applicants	Together NZT Power and NZNS Storage
BEIS	Department of Business, Energy and Industrial Strategy
CCGT	Combined Cycle Gas Turbine
CEMP	Construction Environmental Management Plan
CO ₂	Carbon Dioxide
CTMP	Construction Traffic Management Plan
CWTP	Construction Worker Travel Plan
DCO	Development Consent Order
ES	Environmental Statement
ExA	Examining Authority
LIR	Local Impact Report
LLFA	Local Lead Flood Authority
Mt	Million Tonnes
NPS	National Policy Statement
NZT Power	Net Zero Teesside Power Limited
NZNS Storage	Net Zero North Sea Storage Limited
NZT	Net Zero Teesside - the name of the Proposed Development.
PA 2008	The Planning Act 2008 which is the legislation in relation to applications for NSIPs, including preapplication consultation and publicity, the examination of applications and decision making by the Secretary of State
PCC Site	Power, Capture and Compression Site
RCBC	Redcar and Cleveland Borough Council
Proposed Development (or Project)	The development to which the Application relates and which requires a DCO, and as set out in Schedule 1 to the Order
RCBC	Redcar and Cleveland Borough Council

SoCG	Statement of Common Ground
SoS	Secretary of State for Business, Energy and Industrial Strategy
STBC	Stockton-on-Tees Borough Council
STDC	South Tees Development Corporation Teesworks
Work No.	Work number, a component of the Proposed Development, described at Schedule 1 to the Order

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1.0 INTRODUCTION

1.1 Overview

1.1.1 This document, the 'Applicants' comments on Local Impact Reports' (Document Ref. 9.9), has been prepared on behalf of Net Zero Teesside Power Limited and Net Zero North Sea Storage Limited (the 'Applicants'). It relates to the application (the 'Application') for a Development Consent Order (a 'DCO'), that has been submitted to the Secretary of State (the 'SoS') for Business, Energy and Industrial Strategy (BEIS), under Section 37 of 'The Planning Act 2008' (the 'PA 2008') for the Net Zero Teesside Project (the 'Proposed Development').

1.1.2 The Application was submitted to the SoS on 19 July 2021 and was accepted for Examination on 16 August 2021. A change request made by the Applicants in respect of the Application was accepted into the Examination by the Examining Authority on 6 May 2022.

1.2 Description of the Proposed Development

1.2.1 The Proposed Development will work by capturing CO₂ from a new the gas-fired power station in addition to a cluster of local industries on Teesside and transporting it via a CO₂ transport pipeline to the Endurance saline aquifer under the North Sea. The Proposed Development will initially capture and transport up to 4Mt of CO₂ per annum, although the CO₂ transport pipeline has the capacity to accommodate up to 10Mt of CO₂ per annum thereby allowing for future expansion.

1.2.2 The Proposed Development comprises the following elements:

- **Work Number ('Work No.') 1** – a Combined Cycle Gas Turbine electricity generating station with an electrical output of up to 860 megawatts and post-combustion carbon capture plant (the '**Low Carbon Electricity Generating Station**');
- **Work No. 2** – a natural gas supply connection and Above Ground Installations ('AGIs') (the '**Gas Connection Corridor**');
- **Work No. 3** – an electricity grid connection (the '**Electrical Connection**');
- **Work No. 4** – water supply connections (the '**Water Supply Connection Corridor**');
- **Work No. 5** – waste water disposal connections (the '**Water Discharge Connection Corridor**');
- **Work No. 6** – a CO₂ gathering network (including connections under the tidal River Tees) to collect and transport the captured CO₂ from industrial emitters (the industrial emitters using the gathering network will be responsible for consenting their own carbon capture plant and connections to the gathering network) (the '**CO₂ Gathering Network Corridor**');
- **Work No. 7** – a high-pressure CO₂ compressor station to receive and compress the captured CO₂ from the Low Carbon Electricity Generating Station and the CO₂

Gathering Network before it is transported offshore (the '**HP Compressor Station**');

- **Work No. 8** – a dense phase CO₂ export pipeline for the onward transport of the captured and compressed CO₂ to the Endurance saline aquifer under the North Sea (the '**CO₂ Export Pipeline**');
- **Work No. 9** – temporary construction and laydown areas, including contractor compounds, construction staff welfare and vehicle parking for use during the construction phase of the Proposed Development (the '**Laydown Areas**'); and
- **Work No. 10** – access and highway improvement works (the '**Access and Highway Works**').

1.2.3 The electricity generating station, its post-combustion carbon capture plant and the CO₂ compressor station will be located on part of the South Tees Development Corporation (STDC) Teesworks area (on part of the former Redcar Steel Works Site). The CO₂ export pipeline will also start in this location before heading offshore. The generating station connections and the CO₂ gathering network will require corridors of land within the administrative areas of both Redcar and Cleveland and Stockton-on-Tees Borough Councils, including crossings beneath the River Tees.

1.3 The Purpose and Structure of this document

1.3.1 The purpose of this document is to set out the Applicants' comments on the Local Impact Reports (LIRs) submitted by Redcar and Cleveland Borough Council [REP1-046] and Stockton-on-Tees Borough Council [REP1-047] at Deadline 1 of the Examination (26 May 2022).

1.3.2 The document is structured as follows:

- Section 2 - sets out the Applicants' comments on the RCBC LIR.
- Section 3 - sets out the Applicants' comments on the STBC LIR.

2.0 APPLICANTS' COMMENTS ON THE REDCAR AND CLEVELAND BOROUGH COUNCIL LOCAL IMPACT REPORT

- 2.1.1 The Applicants' welcome the submission of Redcar and Cleveland Borough Council's (RCBC's) Local Impact Report (LIR) [REP1-046].
- 2.1.2 Section 9 sets out key issues identified by RCBC in relation to the Proposed Development. These include policy context; sustainability; landscape and visual impact; biodiversity and ecology; highways; residential amenity; environmental protection; drainage and flood risk; socio-economics and conditions/requirements.
- 2.1.3 The Applicants note that RCBC has not identified any conflict between the elements of the Proposed Development within Redcar and Cleveland and relevant local development plan policies at Section 9 of the LIR.
- 2.1.4 The Applicants' comments on RCBC's consideration of the above key issues at Section 9 of the LIR are set out in **Table 2.1** below.
- 2.1.5 The Applicants welcome the conclusions of the LIR, which recognise that the Proposed Development will provide a number of positives and benefits for Redcar and Cleveland. However, the Applicants' recognise the need for further dialogue with RCBC to agree the exact wording of the DCO requirements and they will continue to work with the Council to agree these as part of a Statement of Common Ground (SoCG).
- 2.1.6 The Applicants have no further comments on the RCBC LIR.

Table 2-1: Applicants' Comments on RCBC's LIR

NO.	SUMMARY OF LIR COMMENTS	APPLICANTS' COMMENTS
1.	<p>Landscape and Visual Impact</p> <p>RCBC acknowledge that the assessment methodology is considered to be appropriate for the Proposed Development and the viewpoints provide a representative assessment of the Proposed Development.</p> <p>RCBC note that significant adverse visual effects will be experienced from Viewpoint 5 (South Gare Breakwater) during the construction phase, Viewpoint 7 (England Coast Path, Warrenby) during construction, opening and operation phase and Viewpoint 8 (Redcar Seafront) during the construction phase. While the mitigation of infrastructure developments is noted to be challenging, RCBC agree that an appropriate mechanism for minimising adverse impacts through appropriate siting of infrastructure, including use of suitable materials (including colour) is available through Requirement 3 of the draft DCO [AS-004].</p>	<p>THE APPLICANTS NOTE THE COMMENTS MADE BY RCBC. WHILE IT IS NOTED THAT THE PROPOSED DEVELOPMENT WILL RESULT IN MODERATE ADVERSE EFFECTS ON USERS OF THE ENGLAND COAST PATH WHERE IT RUNS ADJACENT TO THE POWER CAPTURE AND COMPRESSION (PCC) SITE, THIS LIMITED IMPACT DOES NOT OUTWEIGH THE SUBSTANTIAL BENEFITS OF THE PROPOSED DEVELOPMENT AND NPS EN-2 RECOGNISES THAT IT WILL NOT ALWAYS BE POSSIBLE TO ELIMINATE THE VISUAL IMPACT OF SUCH INFRASTRUCTURE.</p>
2.	<p>Highways</p> <p>RCBC Highways advise that a revised signalling plan be implemented at the Westgate Roundabout and further analysis be provided in relation to Kirkleatham Lane signals to prove there is sufficient capacity.</p>	<p>THE APPLICANTS ARE PREPARED TO AGREE TO THE INCLUSION OF A REVISED SIGNALLING PLAN AS PART OF THE FINAL CTMP APPROVED BY THE LOCAL PLANNING AUTHORITY.</p>

	<p>RCBC acknowledge that the impacts from operational traffic movements can be adequately managed through an employee travel plan as secured under Requirement 19 of the draft DCO [AS-004].</p> <p>RCBC state that should the Construction Worker Travel Plan (CWTP) and Construction Traffic Management Plan (CTMP) be implemented in their entirety then the content is acceptable subject to suitable monitoring.</p>	<p>THE APPLICANTS WILL PROVIDE FURTHER ANALYSIS IN RELATION TO THE KIRKLEATHAM LANE SIGNALS AT DEADLINE 4.</p> <p>THE APPLICANTS NOTE THE COMMENTS MADE BY RCBC ON THE CWTP AND CTMPS. FRAMEWORK CWTP [APP-333] AND CTMPS [APP-334] WERE SUBMITTED AS PART OF THE APPLICATION. REQUIREMENTS 18 AND 19 OF THE DRAFT DCO WILL SECURE THE DETAIL AND SUBSEQUENT IMPLEMENTATION OF THESE PLANS.</p>
3.	<p>Residential Amenity</p> <p>RCBC acknowledge that the number of residential properties affected by construction activities has been minimised and that noise from construction activities will be managed through suitable working practices secured through Requirement 16 of the draft DCO [AS-004]. Furthermore, that consideration has been given to the impacts of noise and vibration associated with construction on the nearest noise sensitive receptors and measures to control impacts are to be built into the Construction Environmental Management Plan (CEMP) [APP-246].</p>	<p>THE APPLICANTS NOTE THE COMMENTS MADE BY RCBC. ANY POTENTIAL IMPACTS ON RESIDENTIAL AMENITY DURING CONSTRUCTION AND OPERATION WILL BE CONTROLLED THROUGH A NUMBER OF REQUIREMENTS IN THE DRAFT DCO [AS-004], NOTABLY REQUIREMENT 16 'CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN'; 20 'CONSTRUCTION HOURS'; 21 'CONTROL OF NOISE – CONSTRUCTION'; AND 22 'CONTROL OF NOISE – OPERATION'.</p>
4.	<p>Contamination</p> <p>RCBC state that further ground investigation work will be necessary and should be secured by way of requirements in the</p>	<p>THE APPLICANTS NOTE THE COMMENTS MADE BY RCBC. REQUIREMENT 13 'CONTAMINATED LAND AND</p>

	draft DCO [AS-004]. It is acknowledged that this is proposed to be secured by Requirement 13.	GROUNDWATER' OF THE DRAFT DCO [AS-004] WILL SECURE FURTHER INVESTIGATIONS IN RELATION TO GROUND CONDITIONS.
5.	<p>Noise and Vibration</p> <p>RCBC note that the Environmental Statement states that indicative operational noise has been calculated from the Kings Lynn and Eggborough Power Station Environmental Statements (ES) data. Assumptions have been made with regard to embedded mitigation in these developments that has been stripped out to provide a worst case scenario. It is however not entirely clear where the unmitigated scenario with an increase of 7dBA comes from and therefore further details of how this figure was arrived at from the other CCGT plants is requested to verify this level of increase. RCBC also consider that a further detailed noise assessment should be undertaken that validates the modelled noise outputs to ensure design criteria is met.</p>	<p>THE APPLICANTS NOTE THE COMMENTS MADE BY RCBC. THE CORRECTION OF 7 DB HAS BEEN MADE TO THE KINGS LYNN AND EGGBOROUGH POWER STATION DATA TO MODEL AN UNMITIGATED SCENARIO BASED ON OUR EXPERIENCE AND DISCUSSIONS WITH DESIGNERS AT THESE SITES AND OTHER SITES OPERATING COMBINED CYCLE GAS TURBINE (CCGT) POWER STATION. THIS HAS BEEN UNDERTAKEN TO ENSURE THAT THE ASSESSMENT IS CONSERVATIVE.</p> <p>REQUIREMENT 22 'CONTROL OF NOISE – OPERATION' OF THE DRAFT DCO [AS-004] REQUIRES THAT NOISE FROM THE PROPOSED DEVELOPMENT MUST NOT EXCEED 5 DB ABOVE THE DEFINED REPRESENTATIVE BACKGROUND SOUND LEVEL DURING EACH OF THE DAYTIME AND THE NIGHT TIME PERIODS ADJACENT TO THE NEAREST RESIDENTIAL RECEPTORS AT LOCATIONS AGREED WITH THE LOCAL PLANNING AUTHORITY FOLLOWING COMMISSIONING OF THE PROPOSED DEVELOPMENT. FURTHER ASSESSMENT WILL BE UNDERTAKEN AT THE DETAILED DESIGN STAGE IN ORDER TO VERIFY THIS REQUIREMENT IS MET.</p>
6.	Drainage and Flood Risk.	

	<p>The Local Lead Flood Authority (LLFA) note the intention for uncontrolled/unrestricted discharge rates into Tees Bay. Should this solution not be achievable through the final design solution, the Proposed Development may be required to comply with other requirements set out in Policy SD7 of the Local Plan requiring brownfield development to provide a minimum of 50% betterment in runoff from the site.</p> <p>The LLFA note the mitigation measures set out within the ES and request that these are considered and provided where possible in any future detailed design and layouts of the Proposed Development.</p> <p>The LLFA note the requirement to apply to have approved any Ordinary Water Consents which may be necessary when carrying out any approved works.</p>	<p>THE APPLICANTS NOTE THE COMMENTS MADE BY RCBC. THE DETAILED DESIGN OF DRAINAGE AND FLOOD RISK MITIGATION WILL BE SECURED BY REQUIREMENTS 11 'SURFACE AND FOUL WATER DRAINAGE' AND 12 'FLOOD RISK' OF THE DRAFT DCO [AS-004].</p>
7.	<p>Socio Economics</p> <p>RCBC's 'Routes to Employment Team' are eager to promote and support delivery of the job opportunities and upskilling programmes the Proposed Development will bring to local residents.</p>	<p>THE APPLICANTS WELCOME THE SUPPORTIVE COMMENTS FROM RCBC REGARDING SOCIO-ECONOMICS AND NOTE THE COMMENTS ABOUT JOB OPPORTUNITIES AND UPSKILLING PROGRAMMES. REQUIREMENT 38 OF THE DRAFT DCO [AS-004] SECURES THE PREPARATION OF, AND APPROVAL BY THE LOCAL PLANNING AUTHORITY, OF AN EMPLOYMENT, SKILLS AND TRAINING PLAN. THE APPLICANTS WILL ENGAGE WITH THE COUNCIL IN THE PREPARATION OF THIS PLAN IN ORDER TO MAXIMISE THE BENEFITS OF THE PROPOSED DEVELOPMENT TO TEESSIDE AS FAR AS PRACTICABLE.</p>

8.	Conditions/Requirements RCBC intend to continue working with the Applicants and the ExA in order to reach agreement on the wording of relevant requirements.	THE APPLICANTS WELCOME RCBC'S COMMITMENT TO CONTINUE TO ENGAGE ON THE AGREEMENT OF THE WORDING OF REQUIREMENTS. THE APPLICANTS LOOK FORWARD TO RECEIVING COMMENTS FROM RCBC ON THE DRAFT REQUIREMENTS.

3.0 APPLICANTS' COMMENTS ON THE STOCKTON-ON-TEES BOROUGH COUNCIL LOCAL IMPACT REPORT

3.1.1 The Applicants' welcome the submission of Stockton-on-Tees Borough Council's (STBC's) Local Impact Report (LIR) [REP1-047].

3.1.2 The Applicants note that STBC has concluded that there is no conflict between the elements of the Proposed Development within Stockton-on-Tees and relevant local development plan policies, notably:

- Policy EG4 'Seal Sands, North Tees and Billingham'.
- Policy EG5 'Durham Tees Valley Airport'.
- Policy ENV4 'Reducing and Mitigating Flood Risk'.
- Policy SD5 'Natural, Built and Historic Environment'.
- Policy ENV7 'Ground, Air, Water, Noise and Light Pollution' (note the LIR mistakenly refers to Policy ENV8).

3.1.3 The Applicants note that STBC consider that all relevant developments have been identified in the cumulative and combined effects chapter (Chapter 24) [APP-106] of the Environmental Statement.

3.1.4 The Applicants welcome the conclusions of the LIR, which are that:

- The principle of developments that lower carbon emissions is supported by the local planning authority.
- The social, environmental and economic benefits of the Proposed Development will make a significant contribution to meeting national targets and policies and there are no impacts in Stockton-on-Tees Borough that will lead to any objections or concerns.
- The Proposed Development will support local businesses and create jobs for local people, which will have a positive impact on the Borough.

3.1.5 The Applicants will continue to work with STBC to agree a SoCG.

3.1.6 The Applicants have no further comments on the STBC LIR.