

# 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: 9.11 Applicants' Comments on Deadline 2 Submissions](#)

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

<b>Abbreviation</b>	<b>Description</b>
AOD	Above ordnance datum
AS-	Additional Submissions
BAT	Best Available Techniques
BEIS	The Department for Business, Energy and Industrial Strategy
CCGT	Combined Cycle Gas Turbine
CCUS	Carbon Capture, Utilisation and Storage
CEMP	Construction and Environmental Management Plan
CTMP	Construction Traffic Management Plan
CO <sub>2</sub>	Carbon dioxide
CPO	Compulsory Purchase Order
dB	Decibels
DCO	Development Consent Order
dDCO	Draft Development Consent Order
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
ES	Environmental Statement
ETS	Emissions Trading Scheme
ExA	Examining Authority
FEED	Front end engineering and design
FRA	Flood Risk Assessment
Ha	Hectares
HDD	Horizontal Directional Drilling
HIA	Hydrogeological Impact Appraisal
HoT	Heads of Terms
kV	Kilovolts
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
Mt	Million tonnes

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NATS	National Air Traffic Services
NSIP	Nationally Significant Infrastructure Project
NWL	Northumbria Water Lagoon
NZT	The Net Zero Teesside Project
NZT Power	Net Zero Teesside Power Limited
NZNS Storage	Net Zero North Sea Storage Limited
PA 2008	Planning Act 2008
PCC	Power Capture and Compressor Site
PDA-	Procedural Deadline A
PINS	Planning Inspectorate
RCBC	Redcar and Cleveland Borough Council
RR	Relevant Representation
SBC	Stockton Borough Council
SEL	Sound Exposure Level
SPA	Special Protection Areas
SoCG	Statement of Common Ground
SoS	Secretary of State
STDC	South Tees Development Corporation
SuDS	Sustainable urban drainage systems
UXO	Unexploded Ordnance
WFD	Water Framework Directive

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## 1.0 INTRODUCTION

### 1.1 Overview

1.1.1 This document, the 'Applicants' Comments on Deadline 2 Submissions' (Document Ref. 9.11) 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 CO<sub>2</sub> from a new the gas-fired power station in addition to a cluster of local industries on Teesside and transporting it via a CO<sub>2</sub> transport pipeline to the Endurance saline aquifer under the North Sea. The Proposed Development will initially capture and transport up to 4Mt of CO<sub>2</sub> per annum, although the CO<sub>2</sub> transport pipeline has the capacity to accommodate up to 10Mt of CO<sub>2</sub> 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 CO<sub>2</sub> gathering network (including connections under the tidal River Tees) to collect and transport the captured CO<sub>2</sub> 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 '**CO<sub>2</sub> Gathering Network Corridor**');
- **Work No. 7** – a high-pressure CO<sub>2</sub> compressor station to receive and compress the captured CO<sub>2</sub> from the Low Carbon Electricity Generating Station and the

CO<sub>2</sub> Gathering Network before it is transported offshore (the '**HP Compressor Station**');

- **Work No. 8** – a dense phase CO<sub>2</sub> export pipeline for the onward transport of the captured and compressed CO<sub>2</sub> to the Endurance saline aquifer under the North Sea (the '**CO<sub>2</sub> 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 CO<sub>2</sub> 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 CO<sub>2</sub> export pipeline will also start in this location before heading offshore. The generating station connections and the CO<sub>2</sub> 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 summarise the Applicants' comments on the submissions made by Interested Parties at Deadline 2 (9 June 2022). The document is structured to provide comments on the following Interested Parties' Deadline 2 submissions:

- Section 2 – Anglo American
- Section 3 – CATS North Sea Limited
- Section 4 – CF Fertilisers
- Section 5 – Client Earth
- Section 6 – Environment Agency
- Section 7 – Historic England
- Section 8 – Huntsman Polyurethanes (UK) Limited
- Section 9 – INEOS Nitriles (UK) Limited
- Section 10 – Maritime and Coastguard Agency
- Section 11 – Marine Management Organisation
- Section 12 – National Grid Carbon Limited
- Section 13 – National Highways
- Section 14 – Northern Powergrid
- Section 15 – Northumbrian Water Limited

- Section 16 – Orsted
- Section 17 – PD Teesport
- Section 18 – Redcar Bulk Terminal Limited
- Section 19 – Redcar and Cleveland Borough Council
- Section 20 – SABIC UK Petrochemicals Limited
- Section 21 – Sembcorp Utilities (UK) Ltd
- Section 22 – South Tees Development Corporation
- Section 23 – Trinity House of Deptford Strond

## **2.0 ANGLO AMERICAN**

- 2.1.1 The Deadline 2 Submission by Anglo American [**REP2-073**] includes a number of responses to the ExA's First Written Questions (ExQ1) dated 19 May 2022 and their Written Representation.
- 2.1.2 The Applicants have provided comments on Anglo American's submissions within Applicants' Comments on Written Representations (Document Ref. 9.12).



### **3.0 CATS NORTH SEA LIMITED**

- 3.1.1 The Deadline 2 Submission by CATS North Sea Ltd ('CNS'L) includes a number of responses to the ExQ1 [REP2-082] and their Written Representations [REP2-081].
- 3.1.2 The Applicants have provided comments on CNSL's Written Representations within Applicants' Comments on Written Representations (Document Ref. 9.12).
- 3.1.3 The Applicants' comments on CNSL's other submissions are set out below.

#### **3.2 Applicants' Comments**

- 3.2.1 CA.1.8 – The Applicants' note the plan submitted by CNSL. Through direct engagement with CNSL, the Applicants' have been aware of these existing assets and operations. For further detail, see Applicants' Comments on Written Representations (Document Ref. 9.12).
- 3.2.2 CA.1.10 – The Applicants' note CNSL's response and have further addressed these within Applicants' Comments on Written Representations (Document Ref. 9.12).

## **4.0 CF FERTILISERS UK LIMITED**

- 4.1.1 The Deadline 2 Submission by CF Fertilisers UK Limited [**REP2-078**] includes a number of responses to the ExQ1 dated 19 May 2022.
- 4.1.2 CF Fertilisers UK Limited (CFL) did not make any further submissions at Deadline 2.
- 4.1.3 The Applicants' comments on CFL's submissions are set out below.

### **4.2 Applicants' Comments**

- 4.2.1 CA.1.8 – The Applicants note the plan submitted by CFL. Through direct engagement with CFL and site surveys during the Application phase, the Applicants are familiar with the existing CFL apparatus and their potential new gas pipeline. The Applicants are in technical and commercial discussions with CFL, the objective of these discussions is to address CFL's concerns through FEED development and agree protective provisions for the benefit of CFL.
- 4.2.2 CA.1.14 – The Applicants have no further comments on CFL's response.

## **5.0 CLIENTEARTH**

- 5.1.1 The Deadline 2 Submission provided by ClientEarth [**REP2-079**] includes a Written Representation and responses to the Applicant's Deadline 1 comments on ClientEarth's Relevant Representation.
- 5.1.2 The Applicants have made comments on ClientEarth's submission within Applicants' Comments on Written Representations (Document Ref. 9.12).

## 6.0 ENVIRONMENT AGENCY

6.1.1 The Deadline 2 Submission provided by the Environment Agency [REP2-062] includes a number of responses to the EXQ1.

6.1.2 The Applicants comments on the Environment Agency's submission is set out below.

### 6.2 Applicants' Comments

6.2.1 GEN 1.1.6 – The Applicants have no further comments on this response.

6.2.2 AQ 1.2 – The response aligns with the Applicants' response confirming published best available techniques (BAT) guidance.

6.2.3 AQ 1.3 – The response aligns with the Applicants' response confirming published environmental assessment levels ('EALs')

6.2.4 AQ 1.4 – The Environment Agency ('EA') has confirmed agreement that the Applicants are using an approach to modelling to identify reasonable worst case scenarios but deferred any further comment to the Environmental Permit determination – noted.

6.2.5 AQ 1.13 – The EA has deferred any comment in relation to the impacts on habitats to the Environmental Permit determination – noted.

6.2.6 AQ 1.16 – The EA has deferred any comment to the Environmental Permit determination – noted.

6.2.7 BIO 1.2 – The EA response is noted. As explained in the Applicants' Response to the Examining Authority's Written Questions at Deadline 2 [REP2-016] confirmatory water vole and otter surveys are ongoing, with reporting proposed to be submitted at Deadline 5.

6.2.8 BIO 1.5 – The Applicants note the comments of the EA. Water bodies 113 and 114 were not surveyed as both they, and the adjacent access track, are on private land and the landowner did not agree access at the time of the survey.

6.2.9 Water vole and otter surveys are now ongoing and associated reporting, including any updates to the assessments provided in the submitted application, will be submitted at Deadline 5.

6.2.10 BIO 1.16 – The Applicants responded to BIO.1.16 [REP2-016] including confirming how the reinstatement of land is already secured through Requirement 4 of the Draft DCO [REP2-002].

6.2.11 GH 1.1 – The Applicant notes the comments of the EA and request for further information on the preliminary investigations. The Ground investigation Factual Report from 2021 was submitted at Deadline 2 [REP2-026 to REP2-042]. In addition, the Ground Investigation Interpretative Report from 2021 was submitted at Deadline 2 [REP2-043 to REP2-047]. Taken together, these documents provide additional information on existing ground conditions.

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- 6.2.12 GH 1.3 – The EA’s response is noted. The Applicants response to this question is provided in the Applicant’s Response to the Examining Authority’s Written Questions at Deadline 2 [**REP2-016**].
  - 6.2.13 WE 1.14 – The EA’s response is noted, including referring to the responsibilities of the Lead Local Flood Authority (LLFA) Redcar and Cleveland Borough Council (RCBC) in relation to flood emergency response. The Applicants note that RCBC provided a response to this question in their Deadline 2 response [**REP2-094**].
  - 6.2.14 WE 1.21 – The EA’s response noted. Please refer to the Applicants’ response to WE1.14 above in relation to LLFA comments on this question.

## 7.0 HISTORIC ENGLAND

7.1.1 The Deadline 2 Submission by Historic England [REP2-063] includes a number of responses to the ExQ1.

7.1.2 The Applicants' comments on Historic England's submission is set out below.

### 7.2 Applicants' Comments

7.2.1 HE 1.2 – The Applicants have no further comment.

7.2.2 HE.1.3 – Historic England's response is noted including deferring to local planning authorities in relation to non-designated heritage assets.

The Applicants do not agree that Requirement 14(2) of the Draft DCO [REP2-002] needs to be updated – it appropriately refers to Chapter 18 of the Environmental Statement, which is part of the certified documents (as per Schedule 14 to the Draft DCO).

The Applicants have also updated Requirement 14 of the Draft DCO at Deadline 2 to specifically require that the scheme to be submitted must include “a process for how unexpected finds will be dealt with”, which is considered to adequately secure the matters referred to in Historic England's response. The appropriate form of that process can be considered by the relevant planning authority at the time, and can if appropriate include detailed measures such as those set out in Historic England's response.

The Applicants will update Condition 15 of the Deemed Marine Licences in Schedules 10 and 11 of the Draft DCO to specify that the Written Scheme of Investigation must be submitted to and approved by the Marine Management Organisation ('MMO') following consultation with Historic England.

7.2.3 HE 1.4 – The Applicants have no further comment.

7.2.4 HE 1.5 – The Applicants have no further comment.

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## **8.0 HUNTSMAN POLYURETHANES (UK) LIMITED:**

- 8.1.1 The Deadline 2 submission by Huntsman Polyurethanes (UK) Limited ('HPU') includes a number of responses to the ExQ1 [REP2-069] and their Written Representations [REP2-068].
- 8.1.2 The Applicants have provided a response to HPU's submissions within Applicants' Comments on Written Representations (Document Ref. 9.12).

## 9.0 INEOS NITRILES (UK) LIMITED

9.1.1 The Deadline 2 submission by INEOS Nitriles (UK) Limited [REP2-084] includes a number of responses to the ExQ1.

9.1.2 INEOS Nitriles (UK) Limited (Ineos) did not make any further submissions at Deadline

9.1.3 The Applicants' comments on Ineos' submissions are set out below.

### 9.2 Applicants' Comments

9.2.1 CA.1.8 – The Applicants note Ineos' response to the ExA and are aware of the ongoing demolition at the Ineos site.

9.2.2 CA.1.11 – The Applicants note Ineos' responses to i – iii and will continue to keep the ExA updated on progress within the Compulsory Acquisition Schedule (Document Ref. 9.5).

In response to iv, the Applicants have amended the Draft DCO at Deadline 2 [REP2-002], including to update requirement 32 to ensure that there is an obligation on the undertaker to submit a decommissioning plan to the relevant planning authority within a defined timescale, and an obligation to carry out the approved plan. The Applicants consider that the requirement adequately and appropriately provides for and secures decommissioning of the Proposed Development. This is backed up by clear and stringent enforcement powers (including criminal sanctions) available to the relevant planning authority pursuant to the Planning Act 2008 (such as section 161 which makes it an offence to fail to comply with the terms of a DCO).

9.2.3 In addition, as part of the TRI business model development process by BEIS, the requirement for a decommissioning fund has been identified. Through the TRI regulated business model an allowable revenue to be charged to users of the CO<sup>2</sup> Gathering Network will be for funding of future decommissioning costs. The principal mechanism for accruing funds will be through regular funding. The CO<sup>2</sup> transport and storage company will make regular payments into its decommissioning fund through payments derived from user fees charged by the T&SCo.



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## **10.0 MARITIME AND COASTGUARD AGENCY**

10.1.1 The Deadline 2 Submission provided by Maritime and Coastguard Agency [**REP2-087**] includes a number of responses to the ExQ1.

10.1.2 The Applicants comments on the Maritime and Coastguard Agency's submissions is set out below.

### **10.2 Applicants' Comments**

10.2.1 SET 1.5 – The Maritime and Coastguard Agency's response is noted including issues on which it defers to PD Teesport in relation the navigational risk assessment (NRA). The Port Marine Safety Code and Guide to Good Practice are referenced in the NRA submitted with the Application [**APP-341 – APP-343**].

## **11.0 MARINE MANAGEMENT ORGANISATION**

11.1.1 The Deadline 2 submission provided by the Marine Management Organisation ('MMO') includes the MMO's response to the ExQ1 [REP2-085] and its comments on Relevant Representations [REP2-086], which included Relevant Representations and comments on other submissions at Deadline 1.

11.1.2 The Applicants response to the MMOs submissions is set out below.

### **11.2 Applicants' Comments on Responses to ExQ1 [REP2-085]**

11.2.1 DLV.1.8 – The MMO's response is noted in relation to viewpoints.

11.2.2 HE 1.2 – The MMO's response is noted, deferring to Historic England on matters relating to marine heritage.

11.2.3 SET 1.5 – The MMO's response is noted, deferring to MCA, Trinity House and the local Port Authorities as the appropriate bodies in relation to navigational risks.

### **11.3 Applicants' Comments on the MMO's Further Comments on their Relevant Representations [REP2-086]**

11.3.1 The Applicants note the comments made by the MMO in relation to the Environment Agency's Relevant Representation [RR-024] on UXO matters and in relation to impact on fish migration noting the MMO's preference to manage this activity via a separate Marine Licence.

11.3.2 As set out in Document 9.6: Applicants' Comments on Relevant Representation submitted at Deadline 1 [REP1-045] the Applicants propose to update the Framework CEMP stating that the EA must be consulted on the UXO clearance methodology and will consider impacts to fish migration, as discussed and agreed with the EA on 1 April 2022.

11.3.3 The Applicants have updated condition 23(c) of the DML within Draft DCO submitted at Deadline 2 [REP2-002] to make clear that no removal or detonation of UXOs can be carried out without the UXO clearance methodology being approved by the MMO and that the methodology submitted for approval must contain information to demonstrate how the best available evidence and technology has been taken into account in formulating the methodology. The Applicants consider that this provides an effective and enforceable mechanism for addressing the MMO's concerns regarding consideration of best available evidence and technology closer to the time that the activity is taking place. With the rationale for the MMO seeking a separate licence having been addressed by this change, the Applicants position is that it is reasonable as well as both efficient and legally robust for the inclusion of the UXO clearance powers to be included in the same licence as the other marine licensable activities.

11.3.4 The MMO's comments in relation to any written representation to be made, updated Statement of Common Ground, comments on the Statement of Commonality [REP2-013] and oral submission in relation to issue specific hearing (ISH) 2 are noted. The Applicants will continue to engage with the MMO in this regard. Updated SoCG with

other Parties will be available for further review by the MMO as they are submitted at relevant deadlines into examination.

- 11.3.5 The Applicants also note that the MMO continues to review the Applicants' Written Summary of Oral Submission for Issue Specific Hearing 2 (ISH2) [**REP1-036**] and will respond to any comments once received.
- 11.3.6 The Applicants note the MMO's request and will keep the MMO updated on discussions with STDC, TVCA & Teesworks Ltd with regards to Work No. 5A.

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## **12.0 NATIONAL GRID CARBON LIMITED**

12.1.1 The Deadline 2 submission by National Grid Carbon Limited [**REP2-083**] includes a number of responses to the ExQ1.

12.1.2 National Grid Carbon Limited did not make any further submissions at Deadline 2.

12.1.3 The Applicants' comments on National Grid Carbon Limited's submissions are set out below.

### **12.2 Applicants' Comments**

12.2.1 GEN.1.4 – The Applicants have no further comment.

12.2.2 GEN.1.5 – The Applicants have no further comment and would refer the ExA to the Applicants response to this question [**REP2-016**].

## 13.0 NATIONAL HIGHWAYS

13.1.1 The Deadline 2 submission by National Highway [REP2-064] includes a number of responses to the ExQ1.

13.1.2 The Applicants comments on National Highways submissions are set out below.

### 13.2 Applicants' Comments

13.2.1 TT 1.4 – National Highways' Deadline 2 response is noted and further dialogue has taken place regarding the A1085/A1053 junction. The Applicants have continued to engage with National Highways on this matter and is seeking to agree that the construction impact at the A1085 / A1053 roundabout during the weekday AM and PM peak periods would be suitably controlled through the final Construction Traffic Management Plan (CTMP) and Construction Worker Travel Plan (CWTP) which would be submitted for approval prior to construction starting on site in accordance with Requirements 18 and 19 of the Draft DCO [REP2-002]. No updates to the Linsig model are proposed.

13.2.2 TT 1.5 – National Highways' response is noted and further correspondence has been had with National Highways to signpost Requirements 18 and 19 of the Draft DCO, which are considered to appropriately control the impact upon the road network (including the strategic road network ('SRN')) during the construction phase.

13.2.3 TT 1.7 – National Highways' response is noted and further correspondence has been had with National Highways to signpost Requirements 18 and 19 of the Draft DCO. Please refer also to the Applicant's response to TT.1.4

## **14.0 NORTHERN POWERGRID**

- 14.1.1 The Deadline 2 submission by Northern Powergrid [**REP2-088**] includes a number of responses to the ExQ1.
- 14.1.2 Northern Powergrid did not make any further submissions at Deadline 2.
- 14.1.3 The Applicants' comments on Northern Powergrid's submissions are set out below.

### **14.2 Applicants' Comments**

- 14.2.1 CA.1.8 – The Applicants' note Northern Powergrid's plan and wish to clarify that this is overlaid onto the original submission Order Limits. These have since been reduced following the acceptance of the Applicants' change request [**PD-010**]. The Applicants are familiar with Northern Powergrid's existing apparatus, having received this information directly from Northern Powergrid in 4Q 2021. The Applicants continue to engage with Northern Powergrid on adequate protective provisions and with support of their nominated contractor to address Northern Powergrid's technical concerns during FEED.
- 14.2.2 CA.1.18 – The Applicants' have no further comment on Northern Powergrid's response.

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## 15.0 NORTHUMBRIAN WATER LIMITED

- 15.1.1 The Deadline 2 submission by Northumbrian Water Limited ('NWL') includes a number of responses to the ExQ1 [REP2-077] and their Written Representations [REP2-075]. There are also cover letters for these submissions, REP2-076 and REP2-075 respectively.
- 15.1.2 The Applicants have provided comments on NWL's Written Representation within Applicants' Comments on Written Representations (Document Ref. 9.12).
- 15.1.3 The Applicants' comments on NWL's other submissions are set out below.

### 15.2 Applicants' Comments

- 15.2.1 CA.1.9 – The Applicants continue to engage with NWL on protective provisions and have made good progress following receipt of NWL's preferred set of provisions. The Applicants continue to work with NWL on technical matters, including any potential impact the construction and operation of the Proposed Development could have on NWL operations. During FEED, the Applicants and their nominated contractor will look to minimise and/or mitigate NWL's concerns. Liaison with and NWL's input to the works is secured by the protective provisions.
- 15.2.2 WE.1.1 – The Applicants have regular interface calls with NWL covering a broad range of discussion points. Regarding water supply the Applicants' intention is to utilise the existing water supply connections from NWL to the Teesworks site. While the Applicants are in discussion directly with STDC for a commercial supply agreement, they are keeping NWL updated on progress and with water demand requirements as the supplier of both industrial and potable water.
- 15.2.3 WE.1.2 – The Applicants have no further comment and will keep the ExA updated on progress within the SoCG (Document Ref. 8.12).

## **16.0 ORSTED HORNSEA PROJECT FOUR LIMITED**

- 16.1.1 The Deadline 2 submissions by Orsted Hornsea Project Four Limited include their Written Representations [REP2-089], a Summary of their Written Representations [REP2-090], a Legal Submission Note [REP2-092] and a cover letter for the latter [REP2-091].
- 16.1.2 The Applicants have commented on Orsted Hornsea Project Four Limited's submissions within Applicants' Comments on Written Representations (Document Ref. 9.12).



## 17.0 PD TEESPORT LIMITED

17.1.1 The Deadline 2 submission by PD Teesport Limited [REP2-093] includes a number of responses to the ExQ1.

17.1.2 PD Teesport Limited (PDT) did not make any further submissions at Deadline 2.

17.1.3 The Applicants' responses to PDT's submissions are set out below.

### 17.2 Applicants' Comments

17.2.1 CA.1.7 – The Applicants note PDT's response. Whilst the Applicants have sought compulsory acquisition powers within the DCO Application, their preference wherever possible is to conclude a voluntary agreement and associated protective provisions with all parties. The Applicants are in discussion with PDT for both a voluntary agreement and protective provisions, the status of these discussions is included in the Compulsory Acquisition Schedule (Document Ref. 9.5). Regarding plot 112, following agreement with PDT, the Applicants are in direct discussion with CNSL on a voluntary agreement for sublease. The Applicants will continue to keep PDT updated on the progress of these discussions.

17.2.2 CA.1.8 – The Applicants note PDT's response. The river map referred to by PDT is included as Appendix A1 within the SoCG [REP1-016]. The Applicants can confirm that they have received the plans submitted by PDT within their response. The Applicants and their nominated contractor are using this information to influence FEED. The Applicants acknowledge that there are a number of existing apparatus adjacent to and below Seal Sands Rd. All physical activities by the Applicants for the Proposed Development will undergo thorough risk assessment and planning prior to execution and comply with existing controls of work for operators of the apparatus. The Applicants' protective provisions (included within Part 13 of Schedule 12 to the Draft DCO [REP2-002]) secure appropriate controls in respect of PDT's operations and access routes (the latter applying to other users as well as PDT itself), and with other Parts of Schedule 12 providing protection directly for owners/operators of other apparatus.

17.2.3 CA.1.20 –

i – The Applicants note PDT's response.

ii – See 17.2.1.

iii – The Applicants note PDT's response. The Applicants are in discussion with PDT on adequate protective provisions (PPs) and will continue to update the ExA on progress within the Compulsory Acquisition Schedule (Document Ref. 9.5) and the SoCG (Document Ref. 8.13). The PPs have been updated in the Draft DCO [REP2-002] and are considered to adequately protect PDT's interests. The Applicants welcome PDT's acknowledgement that plots 224 and 225 have now been removed from the Order Limits.

i – Regarding the response to item i addressed to the Applicants. The Applicants note PDT's response and has since engaged directly with PDT for support in identification

of rights of access to the Redcar Bulk Terminal. The Applicants will update the Book of Reference on this point if necessary.

- 17.2.4 SET.1.5 – The Applicants note PDT’s response and will engage directly with PDT on the matter.
- 17.2.5 TT.1.12 – The Applicants consider that this is a matter which would be dealt with closer to construction, once the EPC contractor has been selected but the Applicants note PDT’s response and will engage directly with the Port Authority on this matter.

## **18.0 REDCAR BULK TERMINAL LIMITED**

- 18.1.1 The Deadline 2 submission by Redcar Bulk Terminal Limited ('RBT') includes a number of responses to the ExQ1 [REP2-096] and their Written Representations [REP2-095].
- 18.1.2 The Applicants have provided a response to RBT's submissions within the Applicants' Comments on Written Representations (Document Ref. 9.12).

## 19.0 REDCAR AND CLEVELAND BOROUGH COUNCIL

19.1.1 The Deadline 2 submission by Redcar and Cleveland Borough Council ('RCBC') [REP2-094] includes a number of responses to the ExQ1.

19.1.2 RCBC did not make any further submissions at Deadline 2.

19.1.3 The Applicants' comments on RCBC's submissions are set out below.

### 19.2 Applicants' Comments

19.2.1 GEN.1.16 – Comments noted. The Applicants have no comments to make.

19.2.2 GEN.1.37 – The updated Planning Statement [REP1-003] submitted by the Applicants at Deadline 1 does include 'Table 3.1 – Relevant Planning History'. An updated version of Table 3.1 will be provided at Deadline 4. The Long and Short Lists of Developments, Table 24-5 and Figures 24-2 and 24-3 of the Environmental Statement [APP-106, APP-235 and APP-236] will also be updated for Deadline 4.

19.2.3 BIO.1.20 – Comments noted. The Applicants have no comments to make.

19.2.4 DLV.1.4 – Comments noted. The Applicants have no comments to make.

19.2.5 DLV.1.5 – Comments noted. The Applicants have no comments to make.

19.2.6 DLV.1.7 – Comments noted. The Applicants have no comments to make.

19.2.7 DLV.1.8 – Comments noted. The Applicants have no comments to make.

19.2.8 DLV.1.17 – Comments noted. The Applicants have no comments to make.

19.2.9 HE.1.2 – Comments noted. The Applicants have no comments to make.

19.2.10 HE.1.3 – Comments noted. The Applicants note that Cleveland Industrial Archaeological Society (CIAS) is not a statutory consultee but a local society that makes records of industrial sites and equipment, carries out historical research and works to help the preservation of business records and physical relics.

19.2.11 HE.1.4 – Comments noted. The Applicants have no comments to make.

19.2.12 HE1.6 – Comments noted. The Applicants have no comments to make.

19.2.13 PPL.1.1 – Comments noted. The Applicants have no comments to make.

19.2.14 SET.1.1 – Comments noted. The Applicants have no comments to make.

19.2.15 SET.1.3 – Comments noted. The Applicants have no comments to make.

19.2.16 SET.1.6 – Comments noted. The Applicants do not consider that there would be significant effects on Redcar Town Football Club during the construction or operational phases. Redcar Town Football Club is located approximately 500m to the northeast of the nearest part of the Proposed Development, which is the water supply connection corridor. The football club is located at Mo Mowlam Memorial Park with access off the A1085 Trunk Road. This section of Trunk Road will be used by construction workers locally based in Redcar and settlements to the east to access the site. The ES Traffic and Transportation Assessment [APP-098] does not identify any significant effects on either capacity or road safety arising from this. Based on

this, it is not expected the Proposed Development will interact with Redcar Football Club.

- 19.2.17 SET.1.8 – Comments noted. The Applicants have no comments to make.
- 19.2.18 TT.1.4 – Comments noted. The Applicant notes the comments made by RCBC Highways, however based on the response to the scoping opinion [APP-243] required a Transport Assessment be produced. As part of the Transport Assessment [APP-243] RCBC Highways confirmed they were happy with the proposed methodology for the assessment (email dated 22 January 2020). With regard to the approach taken on MCC1, MCC2 and MCC3, this approach is a standard approach to establish the peak hours for assessment, the total flows arriving at each individual junction have been calculated for each hour so the peak hour can be identified.
- 19.2.19 TT.1.5 – Comments noted. The Applicants have no comments to make.
- 19.2.20 TT.1.7 – Comments noted. The Applicants note that RCBC consider that the list of other committed developments is still acceptable. As confirmed above in response to GEN.1.37, an updated version of Table 3.1 of the Planning Statement [REP1-003] will be provided at Deadline 4 along with updated versions of the Long and Short Lists of Developments, Table 24-5 and Figures 24-2 and 24-3 [APP-106, APP-235 and APP-236].
- 19.2.21 WE.1.4 – Comments noted. The Applicants have no comments to make.
- 19.2.22 WE.1.14 – Comments noted. The Applicants have no comments to make.
- 19.2.23 WE.1.21 – Comments noted. The Applicants have no comments to make.

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## 20.0 SABIC UK PETROCHEMICALS LIMITED

- 20.1.1 The Deadline 2 submission by SABIC UK Petrochemicals Limited ('SABIC') includes a number of responses to the ExQ1 [REP2-101] and their Written Representations [REP2-100].
- 20.1.2 The Applicants have provided comments on SABIC's submissions within Applicants' Comments on Written Representations (Document Ref. 9.12).

## 21.0 SEMBCORP UTILITIES (UK) LTD

21.1.1 The Deadline 2 submission by Sembcorp Utilities (UK) Ltd ('Sembcorp') includes a number of responses to the ExQ1 [REP2-099] and their Written Representations [REP2-098].

21.1.2 The Applicants have provided comments on Sembcorp's Written Representations within Applicants' Comments on Written Representations (Document Ref. 9.12).

21.1.3 The Applicants' responses to Sembcorp's other submissions are set out below.

### 21.2 Applicants' Comments

21.2.1 GEN.1.14 – The Applicants have commented on this response in paragraphs 56-59 of the Applicants' comments on Sembcorp's Written Representation (Document Ref. 9.12).

21.2.2 GEN.1.38 – The Applicants have no further comment, it is in discussion with Sembcorp, SABIC, Anglo American and CFL to address any concerns the Proposed Development may have on existing or future operations.

21.2.3 CA.1.7 – The Applicants have commented on this response in paragraphs 51-72 of the Applicants' comments on Sembcorp's Written Representation (Document Ref. 9.12).

21.2.4 CA.1.8 – The Applicants note Sembcorp's plan. The Applicants have commented on this response where required in the Applicants' comments on Sembcorp's Written Representation (Document Ref. 9.12).

21.2.5 CA.1.21 –

- I. The Applicants note Sembcorp's plan. The Applicants have commented on this response where required in the Applicants' comments on Sembcorp's Written Representation (Document Ref. 9.12).
- II. The Applicants have commented on this response in paragraphs 56-61 of the Applicants' comments on Sembcorp's Written Representation (Document Ref. 9.12).
- III. The Applicants have commented on this response in paragraphs 26-28, 44-50 and 69-71 of the Applicants' comments on Sembcorp's Written Representation (Document Ref. 9.12).
- IV. The Applicants have commented on this response in paragraphs 55-72 of the Applicants' comments on Sembcorp's Written Representation (Document Ref. 9.12).
- V. The Applicants acknowledge the work being undertaken by Sembcorp with regard to No.2 tunnel. A further cost undertaking was provided to DLA on 17 February 2022. The Applicants are not aware of a request for a further undertaking since then but are happy to consider a further request if one is made.

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- VI. Please see the Applicants' response to Sembcorp's Written Representation (Document Ref. 9.12) in relation to protective provisions.
- 21.2.6 CA.1.24 – The Applicants have commented on this response in paragraphs 51-72 of the Applicants' comments on Sembcorp's Written Representation (Document Ref. 9.12).
- 21.2.7 TT.1.1 – The Applicants note Sembcorp's response to the ExA. The Applicants would refer the ExA to the Applicants' response to this question [**REP2-016**]. To clarify within the agreed Heads of Terms with Sembcorp there is an allowance to utilise the existing road network for the purposes of access to facilitate the construction and operation of the Proposed Development. The access required from and requested of Sembcorp is for access to Work Nos. 2A, 2B, 5C and 6 only. Access to the PCC Site and related areas located in the Teesworks site would be via public highways and accesses directly from those into the Teesworks site.



## 22.0 SOUTH TEES DEVELOPMENT CORPORATION

22.1.1 The Deadline 2 submission by South Tees Development Corporation ('STDC') includes a number of responses to the ExQ1 [REP2-097b], their Written Representations [REP2-097a] and Responses to comments on Relevant Representations [REP2-097c].

22.1.2 The Applicants have commented on STDC's Written Representation within Applicants' Comments on Written Representations (Document Ref. 9.12).

22.1.3 The Applicants' comments on STDC's other submissions are set out below.

### 22.2 Applicants' Comments on STDC's Responses to ExQ1

22.2.1 GEN.1.11 – The Applicants have no further comment and would refer the ExA to the Applicants response to this question [REP2-016].

22.2.2 GEN.1.12 – The Applicants have no further comment and would refer the ExA to the Applicants response to this question [REP2-016].

22.2.3 GEN.1.41 – The Applicants have no further comment and would refer the ExA to the Applicants response to this question [REP2-016].

22.2.4 BIO.1.20 – The Applicants have no further comment.

22.2.5 CA.1.7 –

VII. The Applicants position with regards to Plots 274 and 279 is detailed in the Applicants response to paragraphs 3.9-3.12 of STDC's Written Representation (Document Ref. 9.12). With reference to STDC's wording "*STDC understands that this area is being removed from the Order limits as the Applicants accept that they can use alternative route offered by STDC*" this is incorrect. The Applicants have consistently maintained the position during discussions with STDC that the Applicants would need to secure the alternative route via a legally binding agreement before any potential changes to the Order Limits could be considered.

VIII. Regarding plot 427, this plot is required for the construction and operation of Work No. 3A. The Applicants and STDC are in ongoing technical discussion on the proposed routing of Work No. 3A and are working to accommodate existing rights within a technically acceptable design.

Regarding plots 377 & 378, these plots are within the Order Limits for an easement for Work No. 5B and 8, and to facilitate emergency egress from the main site during operation (Work No. 10). The Applicants believe all of these can be accommodated within the existing rights.

Regarding plots 292, 293 and 295, refer to the Applicants response to paragraphs 3.14-3.16 of STDC's Written Representation (Document Ref. 9.12). In addition, the Applicants would clarify that plot 293 directly below plot 323 is required for the Proposed Development. This has always formed part of the main option agreement with STDC. The Applicants have provided further clarity

on the Order Land proposed to be removed from the Order Limits in the updated SoCG (Document Ref. 8.3) submitted at Deadline 3.

Regarding plots 290 & 291, refer to the Applicants response to paragraph 3.13 of STDC's Written Representation (Document Ref. 9.12). In response to the clarity requested on plot 291, see paragraph 22.3.26 below.

Regarding plots 298, 299 & 309, refer to the Applicants response to paragraphs 3.5-3.8 of STDC's Written Representation (Document Ref. 9.12). The Applicants wish to clarify that plot 309 is unrelated to construction access from Redcar Bulk Terminal. Plot 309 is within the Order Land for the benefit of Work No. 9A only.

Regarding plot 342, the position outlined by STDC is incorrect. The full extent of plot 342 is required for the Proposed Development. The Applicants are not aware of the basis of STDC's position as this area has always formed part of the main option agreement.

#### 22.2.6 CA.1.23 –

- I. Regarding plot 409 & associated plots, the Applicants acknowledge STDC's observation on the width of plot 409 in comparison to plot 464. The width of plot 409 is required to accommodate a utility corridor for Work Nos. 2A, 3A, 5C, 6 and 10. As this utility corridor reaches the main site (plot 450) a number of these Works will enter the main site boundary based on optimum routing. The remaining Works will continue into plot 464 and run parallel to the main site boundary before entering the main site at an appropriate location. Given this the extent of the corridor required is reduced at the interface between plot 409 and 464. The configuration of these Works within the utility corridor is subject to FEED development and as such Work Nos. 2A, 3A, 5C and 6 overlap.

Regarding plot 425, the northern end of plot 425 overlaps with the proposed routing for the water connection (Work No. 4). This aligns to the existing water supply pipelines routing in the Teesworks site. These pipelines enter an existing valve pit in the western end of plot 472. For clarity the Applicants will split plot 425 at the boundary of Work No. 4, during the next update of the Land Plans.

Regarding plot 464, the Applicants are only aware of limited existing utilities in plot 464 based on information shared by STDC. Based on information shared by STDC on future primary service corridors as part of the wider Teesworks site development plot 464 would have no interaction with STDC's utility corridors and therefore at present it is being designed as an exclusive corridor. Regarding part 3 of the Book of Reference, plot 464 will be added during the next update.

Regarding plots 412, 419, 435 & 489, these plots form part of existing Teesworks site estate roads. Permanent rights are sort in order to secure easements and/or access rights for the construction and operation of the Proposed Development. Refer to the Applicants response to paragraph 3.23.3 of STDC's Written Representation (Document Ref. 9.12).

Regarding plots 458, 470, 473 and related plots, refer to the Applicants response to paragraph 3.23.3 of STDC's Written Representation (Document Ref. 9.12).

Regarding plot 472, refer to the Applicants response to paragraph 3.23.3 of STDC's Written Representation (Document Ref. 9.12).

Regarding plots 297, 304, 306, 307, 308, 310, 311, 312 & 326, refer to the Applicants response to paragraphs 3.17-3.19 of STDC's Written Representation (Document Ref. 9.12).

- II. In addition to the Applicants responses on this point previously. The comparison between width of utility corridors on STDC land with that used elsewhere is not a like for like comparison. The utility corridor on STDC land is for the benefit of Work Nos. 2A, 3A, 5C & 6. As the utility corridor continues onto Anglo American land it is only for the benefit of Work Nos. 2A, 5C & 6. Once the Order Limits for the Proposed Development reach the Sembcorp linkline corridor at Bran Sands/Dabholm Gut it is only for the benefit of Work No. 6.
- III. Refer to the Applicants response to paragraphs 4.5-4.9 of STDC's Written Representation (Document Ref. 9.12).
- IV. Regarding 4.10.3, refer to the Applicants response to paragraphs 3.20-3.25 of STDC's Written Representation (Document Ref. 9.12).  
Regarding 4.10.4, the Applicants are in discussions with STDC on the potential to route a section of Work No. 3A within a utility corridor to be established by STDC.  
Regarding 4.10.5, refer to the Applicants response to paragraphs 3.5-3.19 and 6.1-6.2 of STDC's Written Representation (Document Ref. 9.12).
- V. Refer to the Applicants response to paragraphs 6.7-6.8 of STDC's Written Representation (Document Ref. 9.12).
- VI. Refer to the Applicants response to paragraphs 3.9-3.12 and 6.3-6.6 of STDC's Written Representation (Document Ref. 9.12).
- VII. Refer to the Applicants response to paragraphs 3.5-3.8 of STDC's Written Representation (Document Ref. 9.12).
- VIII. Refer to the Applicants response to paragraphs 4.1-4.3 of STDC's Written Representation (Document Ref. 9.12).

22.2.7 MA.1.15 – The Applicants have no further comment.

### **22.3 Applicants' Comments on STDC's Further Comments on their Relevant Representations**

22.3.1 1) Executive Summary – The Applicants have no further comment.

22.3.2 2) Introduction – The Applicants have no further comment.

22.3.3 3.1-3.9 – The Applicants have no further comment. The arrangements through the draft DCO that will ensure there is no undue disruption to other development proposals are set out in the Applicants response to paragraphs 3.1 to 3.25, 4.5 to 4.9 and 5.5 of STDC's Written Representation (Document Ref. 9.12).

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- 22.3.4 4.1-4.12 – With respect to STDC’s response to question CA.1.23 and CA.1.7, refer to paragraphs 22.2.5-22.2.6 above as well as Applicants response to paragraphs 3.20-3.25 of STDC’s Written Representation (Document Ref. 9.12). With respect to the adequacy of the protective provisions, refer to the Applicant’s response to paragraph 5.5 of STDC’s Written Representation (Document Ref. 9.12). With respect to removal of plots, refer to the Applicants response to paragraphs 3.13 to 3.16 of STDC’s Written Representation (Document Ref. 9.12). The Applicants do not seek rights of compulsory acquisition over any land where it cannot satisfy the legal requirements under s.122 of the Planning Act 2008.
- 22.3.5 With respect to STDC’s comments on utility corridor information, the Applicants held technical calls with STDC in March 2022 where the details of the 28m wide utility corridor was shared, including a basis for the requirement. This was shared in acknowledgement of the STDC RR [RR-035], STDC raised no further technical points at the time. The Applicants previously received details of a 17m utility corridor planned by STDC. The Applicants will need to accommodate Work Nos. 2A, 3A, 5C and 6 within a utility corridor. Along with operation and maintenance access for personnel, vehicles and buried services, since these need to be incorporated when establishing a new utility corridor. This is not comparable to the services and design conditions assumed within the STDC 17m utility corridor.
- 22.3.6 With respect to the utility corridor widths, refer to the Applicants response to paragraph 3.23 of STDC’s Written Representation (Document Ref. 9.12). The Applicants require a degree of flexibility in the extent of the utility corridor to accommodate the technology used and the dimensions and configurations of buildings and structures (within the existing parameters of the Rochdale envelope) to allow for the future selection of the preferred technology and contractor(s). For the foregoing reasons, the utility corridor widths are not limited to 28 metres or less at this stage. Following the detailed design stage and certainty being obtained as to selected technology, a narrower utility corridor within the Order land may be required.
- 22.3.7 4.13-4.15 – The Applicants have no further comment.
- 22.3.8 4.16 – With respect to the adequacy of the protective provisions, refer to the Applicant’s response to paragraph 5.5 of STDC’s Written Representation (Document Ref. 9.12). With respect to the Interface Agreement, refer to the Applicants response to paragraphs 4.5-4.9 of STDC’s Written Representation (Document Ref. 9.12). With respect to STDC consent for the exercise of powers of compulsory acquisition, refer to paragraph 3.4 of STDC’s Written Representation (Document Ref. 9.12).
- 22.3.9 4.17 – Refer to the Applicants response to paragraphs 3.1-3.4 of STDC’s Written Representation (Document Ref. 9.12).
- 22.3.10 4.18.1 – Refer to the Applicants response to paragraphs 3.9-3.12 of STDC’s Written Representation (Document Ref. 9.12).
- 22.3.11 4.18.2 – Refer to paragraph 22.2.6 above.
- 22.3.12 4.18.3 – Refer to paragraph 22.2.6 above.

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- 22.3.13 4.18.4-4.18.7 – Refer to the Applicants response to paragraphs 4.1-4.3 of STDC’s Written Representation (Document Ref. 9.12).
- 22.3.14 4.19-4.20 – Refer to the Applicants response to paragraphs 4.5-4.9 of STDC’s Written Representation (Document Ref. 9.12).
- 22.3.15 4.21-4.23 – With respect to sterilisation of the Freeport, refer to the Applicants response to paragraphs 3.5 to 3.8 of STDC’s Written Representation (Document Ref. 9.12). With respect to the adequacy of the protective provisions, refer to the Applicant’s response to paragraph 5.5 of STDC’s Written Representation (Document Ref. 9.12). With respect to the Interface Agreement, please refer to the Applicants response to paragraphs 4.5-4.9 of STDC’s Written Representation (Document Ref. 9.12).
- 22.3.16 4.24-4.27 – Refer to the Applicants response to paragraphs 3.1-3.4 of STDC’s Written Representation (Document Ref. 9.12).
- 22.3.17 5.1 – Refer to the Applicants response to paragraph 5.6 of STDC’s Written Representation (Document Ref. 9.12).
- 22.3.18 5.2 – Refer to the Applicants response to paragraphs 3.9-3.12 of STDC’s Written Representation (Document Ref. 9.12).
- 22.3.19 5.3 – the Applicants have no further comment.
- 22.3.20 5.4 – Refer to the Applicants response to paragraph 5.7 of STDC’s Written Representation (Document Ref. 9.12).
- 22.3.21 5.5-5.7 – Refer to the Applicants response to paragraphs 5.1-5.3 of STDC’s Written Representation (Document Ref. 9.12).
- 22.3.22 5.8 – Refer to the Applicants response to paragraph 5.5 of STDC’s Written Representation (Document Ref. 9.12).
- 22.3.23 5.9-5.10 – To date the Applicants have received schedule information from STDC that is limited to the demolition and remediation of the main site for the Proposed Development. The Applicants continue to receive monthly schedule updates for this area only. The Applicants and STDC have held a number of scheduling workshops to support the co-operation of the Proposed Development and wider Teesworks site. However, the Applicants are restricted with the developing an integrated schedule due to the lack of information shared by STDC. For details of the Interface Agreement and, if that is not capable of being entered into between the parties, potential changes to the protective provisions to require information sharing on scheduling of works, refer to the Applicants response to paragraphs 4.5 to 4.9 of STDC’s Written Representation (Document Ref. 9.12).
- 22.3.24 5.11 – The Applicants have no further comment.
- 22.3.25 5.13 – Refer to the Applicants response to paragraphs 3.17-3.19 of STDC’s Written Representation (Document Ref. 9.12) and paragraphs 2.2.5 and 2,2,6 above.
- 22.3.26 5.15-5.16 – The example referred to by STDC in their response to CA.1.7 of the ExQ1 is incorrect. Plot 291 is listed in revision 3.0 of the draft DCO **[AS-135]** as required for

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Work No. 9A and 10. This aligns to the Guide to Land Plan Plots [AS-143]. The draft DCO has subsequently been submitted at revision 4.0 [REP2-002] and remains consistent with regards to plot 291.

- 22.3.27 5.17 – The disclosure of the audited accounts provides further evidence that the Applicants and its partners have substantial financial resources available to fund the Proposed Development including all compensation costs that may be incurred to assemble land.
- 22.3.28 6.1-6.10 – The Applicants have no further comment.
- 22.3.29 6.11-6.15 – Refer to the Applicants response to paragraphs 3.9-3.12, 6.3-6.8 of STDC's Written Representation (Document Ref. 9.12) and paragraphs 22.2.5-22.2.6 above.
- 22.3.30 6.16-6.18 – Refer to the Applicants response to paragraphs 6.1-6.2 of STDC's Written Representation (Document Ref. 9.12).
- 22.3.31 6.19-6.20 – The Applicants disagree that it seeks to “*stymie or prevent*” development of the Teesworks site. With respect to the Interface Agreement, refer to the Applicants response to paragraphs 4.5-4.9. Further information on the Applicants proposals to manage the interface between the Proposed Development and other development across the Teesworks site is included in the Applicants response to paragraphs 3.1 to 3.25, 4.5 to 4.9 and 5.5 of STDC's Written Representation (Document Ref. 9.12).
- 22.3.32 6.21 – The Applicants have no further comment.
- 22.3.33 7) Conclusion – Refer to the Applicants response to STDC's Written Representation (Document Ref. 9.12).

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## **23.0 TRINITY HOUSE OF DEPTFORD STROND**

23.1.1 The Deadline 2 submission by Trinity House of Deptford Strond [REP2-080] includes a response to the ExQ1.

### **Applicants' Comments**

23.1.2 SET.1.5 – The Applicants have no further comment.