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Redcar & Cleveland Borough Council
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BY EMAIL ONLY

Date: 23 September 2020
Our ref: 50303/17/JG/JCx/18813599v2
Your ref: R/2020/0411/FFM

Dear David

Redcar Energy Centre proposal at Redcar Bulk Terminal

On behalf of our client, Anglo American Woodsmith Ltd (“Anglo American”), we write to comment on the detailed planning application that has been submitted by Redcar Holdings Limited (“the applicant”) in respect of the Redcar Energy Centre (“REC”) at Redcar Bulk Terminal (“the proposal”).

These comments are made following a review of the documents which are available on the Redcar & Cleveland Borough Council’s Planning Explorer database. It also follows discussions between Anglo American and the applicant regarding the construction and operation of their respective projects.

Whilst our client welcomes the principle of the REC proposal - noting the range of environmental and other socio-economic benefits that the development could bring to the South Tees area - it is important that the two projects work together to ensure that the REC development does nothing to prejudice the currently consented and part-constructed Anglo American Woodsmith Project. The following comments are made in this context.

Traffic & Transport

Chapter 10 of the applicant’s Environmental Statement relates to traffic and transport impacts. It is stated within the chapter that *“there are no sites which have planning permission that would generate a significant level of traffic onto the local network that need to be considered as a committed development and form part of the future year baseline scenario”*.

As a nationally significant infrastructure project, it is important that the Woodsmith Project (as currently permitted and in respect of approvals yet to be sought) is not adversely impacted as a result of any construction or operational traffic impacts associated with REC. We request, therefore, that all permissions relating to the Woodsmith Project are fully assessed by the applicant as part of a future baseline scenario.

In respect of the Woodsmith Project, Highways England expressed a clear view that the wider traffic implications of development needed to be subject of further control and consequently imposed conditions on the York Potash Harbour Facilities 2016 (DCO) and other Teesside consents relating to the Woodsmith Project. This supports the view that a cumulative assessment on traffic and transport impacts is required within the submitted Environmental Impact Assessment.

Whilst reference is made in the Planning Statement regarding the potential use of the existing rail and wharf facilities, it is noted that these are not assessed within Chapter 10 of the Environmental Statement. We request, therefore, that the applicant provides further clarification as to how these modes may be used as part of the REC development, with their cumulative impact assessed with the Woodsmith Project. As appropriate, their further assessment should be made subject of a suitably worded condition to any planning permission.

Geology, Hydrogeology and Contamination

Chapter 9 describes how a Phase 1 Preliminary (Environmental) Risk Assessment has been undertaken in respect of the REC site, identifying the potential for soil and groundwater contamination to be present associated with the past use of the site and its surrounding area. In response, the applicant proposes to develop a Code of Construction Practice as part of any planning permission, to mitigate the potential hazards to identified receptors during the construction phases.

A Phase 2 Site Investigation survey is also proposed to be undertaken prior to construction. This would include an assessment on risks to human health receptors, controlled waters receptors and infrastructure. Given, however, the potential impacts the findings of the Phase II survey could have on the construction process - including the amount of waste and construction traffic associated with the development – we request that this is undertaken upfront and prior to the determination of the application.

Concluding Remarks

We reserve the right to comment further on the application, on submission of further information from the applicant. In the meantime, we respectfully request that we are kept informed of the application's progress throughout its determination period.

Yours sincerely



James Cox
Associate Director

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