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Tees CCPP Project

The Tees Combined Cycle Power Plant Project Land at the Wilton International Site, Teesside Applicant's Comments on Relevant Representations

Examination Deadline 2

The Planning Act 2008 (as amended)



Applicant: Sembcorp Utilities (UK) **Date:** May 2018



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GLOSSARY

Abbreviation	Description
ALARP	as low as reasonably practicable
Applicant	Sembcorp Utilities (UK) Limited
BAT	Best Available Techniques
CCGT	combined cycle gas turbine
CCS	carbon capture and storage
СНР	combined heat and power
СОМАН	Control of Major Accident Hazards
СТМР	a construction traffic management plan
DCO	Development Consent Order
EA	Environment Agency
EIA	Environmental Impact Assessment
ES	Environmental Statement
HGV	heavy goods vehicles
HRSG	heat recovery steam generator
HSE	Health and Safety Executive
MW	megawatts
NEPIC	North East Process Industry Cluster
NEPIC	North East Process Industry Cluster
NGET	National Grid Electricity Transmission PLC
NSIP	Nationally Significant Infrastructure Project
Order	Tees Combined Cycle Power Plant Order
PA 2008	The Planning Act 2008
PINS	Planning Inspectorate
RCBC	Redcar and Cleveland Borough Council
SAC	Special Area of Conservation
SCU	Sembcorp Utilities (UK) Limited
SoCG	Statement of Common Ground
SoS	Secretary of State
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
STDC	South Tees Development Corporation
the project	Tees CCPP
TVWT	Tees Valley Wildlife Trust



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1 INTRODUCTION

Overview

- 1.1 This schedule 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.
 - **'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 2 of the Application. It sets out the Applicant's comments on the Relevant Representations – see Section 2 of this report.





2 THE APPLICANT'S COMMENTS

2.1 The Applicant's comments on the Relevant Representations are set out in **Table 2.1** on the following pages.

Table 2.1 - Applicant's comments on the Relevant Representations

REF NO.	ORGANISA TION/PERS ON	RELEVANT REPRESENTATION	KEY ISSUES	APPLICANT'S CO
1	Tee Valley Combined Authority	Tees Valley Combined Authority supports the Tees CCCP project, involving the creation of a gas fired generating station with an output capacity of up to 1700 megawatts. Bringing back to use a site formerly used by a gas fired generating station will make a major contribution to the ambitions set out in the Tees Valleys Strategic Economic Plan, which identifies economic growth and sustainable jobs at its core. The proposed Wilton Site is without doubt one of the best "ready available" locations for a new gas fired generating station.	Supportive Economic benefit	No response necessary. The support is acknowledged and grateful It is notable that the Applicant now has a fully agreed and signed Tees Valley Wildlife Trust ('TVWT') (Application Document Re Examination.
2	Ian Shallow	My registration number is registration identification number is 20010100. I have been advised to declare interested areas to qualify and this section replaces my original submittal. Being local I am very pro local job developments. I am also keen to discuss any adverse effects such as noise, Night time pollution and traffic issues. These are my views to date until further information on the development becomes public knowledge.	Supportive Noise, Pollution, Traffic	 The Applicant has endeavoured to design the Proposed Developm sensitivities and controls emissions (of noise, to air etc.), so far as (Application Document Refs: 6.2 and 6.3) provides full details of assessments. In terms of air quality (Application Document Ref: 6.2.7), noise ((Application Document Ref: 6.2.11) and traffic (Application Document Ref: 6.2.11) and traffic (Application Document Ref: 6.2.11) and traffic (Application Document and operate without significant environmental effects: A number of requirements forming part of the draft Development commitment to mitigation identified in the ES – relevant to noise, planning conditions) are summarised below: Requirement 5 – External lighting – obligates Applicant to ag Borough Council ('RCBC') prior to the commencement of details of control the construction phase to minimise the impacts of cornoise levels at local receptors, dust, traffic, and working hour the commencement of development; Requirement 15 – Traffic management plan – obligates the A traffic, including heavy goods vehicles and abnormal loads, p Requirement 20 – Operational noise – serves to establish con subject to agreement with RCBC prior to commissioning of the set of the
3	South Tees Development Corporation	Sembcorp, like the South Tees Development Corporation (STDC) is part of the solution to Tees Valley achieving its overall strategic objectives. The announcement about this new gas fired power station is very welcome. Whilst being important locally, power generation and security of supply is equally important at national level. STDC is very supportive of this project which supports that issue, brings new direct and indirect jobs to an area which has seen significant job losses in recent years and will also enhance the offer to potential inward investors both at Wilton and the surrounding area. This area will benefit greatly from more long term sustainable businesses and employment opportunities and STDC are working closely with Sembcorp and other local stakeholders to maximise the benefits of such investments to the wider area. Projects and investments such as this support the vision for the STDC area in our quest for delivering a high value, low carbon, diverse and inclusive circular economy for the Tees Valley.	Supportive Security of supply Economic benefit Employment	No response required. The support is acknowledged and grateful
4	Historic England	The proposed Tees Combined Cycle Power Plant will not directly impact any heritage assets but does fall within the setting of a number of nationally designated assets. Historic England's statutory remit is the impact of the proposal on the most significant of these –	No objection Cultural heritage – impact on Eston	The Applicant welcomes the statement by Historic England that is make any further representations.



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efully received.
ed Statement of Common Ground ('SoCG') with the Ref: 7.1). This has been submitted for Deadline 2 of the
ppment in order that it responds to local environmental as is practicable. The Environmental Statement ('ES') of the methods adopted and the result of the various
e (Application Document Ref: 6.2.8), light pollution bocument Ref: 6.2.10), the ES concludes that the Project acts during construction or operation.
ent Consent Order ('DCO') will secure the Applicant's ise, lighting and traffic. The requirements (similar to
o agree all external lighting with Redcar County f development; nt plan – obligates the Applicant to develop a plan to construction work and specifically emissions to air, ours – to be submitted and approved by RCBC prior to e Applicant to develop a plan to control construction s, prior to the commencement of development; and controls over noise emissions during operation and is of the development.
fully received.
at it has no objection to the Project and does not wish to

REF ORGANIS NO. TION/PER ON		KEY ISSUES	APPLICANT'S CO
	notably, the scheduled monuments at Eston Nab, the grade II* listed Church of St Cuthbert and a number of buildings within the Kirkleatham Conservation Area – as well as the conservation areas at Wilton, Kirkleatham and Yearby.	Nab	
	The photomontages and viewpoint descriptions (contained within chapter 11 and annex K) are particularly useful in that regard and show that the visual impact on the designated heritage assets that fall within Historic England's statutory remit for consideration is limited, and where the development is visible it will not unduly affect the significance of the assets. Of all the surrounding heritage assets, the setting of the Eston Nab scheduled monument will be the most affected as the monument proffers views of the whole development but, considering the surrounding industrialisation of the landscape that has already happened within the monument's setting to the north of the site, it is not considered that the development would detrimentally affect its significance any further. Consequently, Historic England has no objection to the proposal and does not wish to make any further representations.		
5 National Gri Electricity Transmissio Plc	Power Plant Order 201*	Protective Provisions	It has been agreed between the Applicant and NGET that Protecti between SCU and NGET are being varied and updated to allow for hindrances to these leases being agreed in a suitable timeframe to leases will cover NGET rights and any protections that it may req require any additional Protective Provisions in the DCO. This is it is expected this will be completed before the end of the examine However, SCU acknowledges all of NGET's existing rights (inter their associated easements, and SCU is not proposing any powers NGET rights. The Applicant is currently in the process of agreeing a SoCG with with some matters still to be resolved, has been submitted as part Examination.



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ective Provisions are not needed in the DCO as the leases w for the connections to be made. There are no to enable the Proposed Development to proceed. These require and, as such, NGET is satisfied that it does not is something the parties are currently working upon and hination.

nterest in land) in Greystones A & B substations and ers within the DCO to extinguish or prejudice those

with NG. The SoCG (Application Document Ref: 7.5), art of the Applicant's submission for Deadline 2 of the

REF NO.	ORGANISA TION/PERS ON	RELEVANT REPRESENTATION	KEY ISSUES	APPLICANT'S CO
		OVERVIEW		
		In relation to the NGET assets, relevant guidance can be provided on request. Plans showing the Electricity Assets in the area can also be provided on request.		
		In light of the above infrastructure being located within the DCO boundary or in the vicinity of it, National Grid Electricity Transmission PLC wish to make a relevant representation to the above DCO in order to protect their position given the existence of this infrastructure and any other equipment within or adjoining the DCO boundary not already identified. Additionally, National Grid want to ensure that any connections taken to their existing equipment are carried out in an approved manner.		
		National Grid's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order limits should be maintained at all times and access to inspect such apparatus must not be restricted.		
		Appropriate protective provisions will be required to be included within the DCO to ensure that National Grid's apparatus and land interests are adequately protected and to include compliance with National Grid's relevant safety standards. National Grid is currently in discussion with the promoter in order to secure appropriate protective provisions.		
		As a responsible statutory undertaker, National Grid's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations.		
		National Grid reserves the right to make further representations as part of the examination process but in the meantime will contact the promoter to start negotiations with a view to reaching a satisfactory agreement.		
		Please can all future correspondence be sent to Abigail Walters (abigail.walters@shma.co.uk) of Shakespeare Martineau who is instructed to act on behalf of NGET:		
		Abigail Walters Partner Shakespeare Martineau 1 Meridian South, Meridian Business Park, Leicester, LE19 1WY		
	-			
6	Environment Agency	Tees CCPP DCO Application Planning Inspectorate Reference: EN010082	EA to review Air quality – stack height	The Applicant noted that the Environment Agency ('EA') has sur reviewing the submission and that the EA will comment further a
		The Environment Agency wishes to be registered as an interested party for the Tees CCPP Development Consent Order (DCO) application (reference: EN010082). Below we have outlined the main points we wish to make in relation to the DCO application.	CHP Emissions Environmental Permit	The Applicant is currently in the process of agreeing a SoCG with 7.4), with some matters still to be resolved, has been submitted as the Examination.
		• We have previously stated that a stack height and sensitivity study should form part of the DCO application. Our request has been fulfilled by the provision of Document Ref 6.3.8 Environmental Statement Annex E1 -Stack Height Assessment. However, we still	SoCG required	The Applicant is keen to receive detailed comments on the stack the Combined Heat and Power report (Application Document Re- the earliest possible opportunity.
		need to review this assessment and provide our detailed comments at the written representations stage.		The Applicant has been in dialogue with the EA in recent weeks,



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summarised the key areas of its technical focus in r at the written representations stage.

with the EA. The SoCG (Application Document Ref: a spart of the Applicant's submission for Deadline 2 of

ck height assessment (Application Document Ref: 6.3.8), Ref: 5.7) and other matters outlined in the response at

ks, in respect of the SoCG and other matters, and is

REF NO.	ORGANISA TION/PERS ON	RELEVANT REPRESENTATION	KEY ISSUES	APPLICANT'S CO
		 We requested in our scoping opinion response that a Combined Heat and Power (CHP) Ready assessment should be included within the DCO application to demonstrate the use of Best Available Techniques (BAT) to maximise energy efficiency. A CHP Ready Assessment has been submitted under Document Ref 5.7 Combined Heat and Power Assessment. We will review the submitted application and provide our detailed comments at the written representations stage. Our scoping opinion response requested information which considers the impact of reduced emission limit values proposed in the European Union combustion BREF (Best Available Techniques Reference Document). Document Ref 6.2.7 Environmental Statement Chapter 7 Air Quality considers our comments. We will need to review the submitted application and provide our detailed comments at the written representations stage. Our previous response to the Section 42 request for advice included commentary on potential errors in the process contribution source data used to model the environmental impacts of emissions to air. Document Ref 6.2.7 Environmental Statement Chapter 7 Air Quality considers our comments in further detail with reference to other sections of the submitted application. We need to review the submitted application and provide our detailed comments at the written representations stage. The development will require an Environmental Permit under the Environmental Permitting (England & Wales) Regulations 2010. The applicant will need to apply to the Environment Agency for a permit which is subject to a separate consenting process. We expect to receive a Statement of Common Ground, which will set out our specific issues in relation to the DCO application. 		committed to continued dialogue in order to resolve any outstand
	Natural England	 NSIP Reference Name / Code: Tees CCPP project, Sembcorp Utilities UK Limited / EN010082 Location: Wilton International Site, Teesside, Redcar and Cleveland Thank you for your consultation on the above dated 03 January 2018 which was received by Natural England on 04 January 2018. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Relevant Representation PART I: Summary of Natural England's advice. Natural England advises that the project is unlikely to have significant effects on European and nationally designated sites. The application site is of low ecological interest and is unlikely to have direct impacts on protected species or interest features from designated sites. In addition, any impacts on air quality resulting from the project are not considered significant. PART II: Natural England's detailed advice 1.1. Natural England's detailed advice 1.1. Natural England's detailed advice 1.2. Natural England has been working closely with Sembcorp Utilities UK Limited to provide advice and guidance since 2 March 2017. Natural England has also been working with the Environment Agency to provide coordinated advice. When Natural England raised issues in response to the Section 42 consultation (our ref 218490, dated 7 July 2017), the applicant responded by providing an updated version of the Environmental Statement and by 	SoCG Designated sites – air quality No objection	 The Applicant welcomes Natural England's confirmation of its a the Project Site (the 'Site') is of low ecological interest; the Project is unlikely to have direct impacts on protected sp any impacts on air quality resulting from the Project are not effects (by themselves or in combination). It is notable that the Applicant now has a fully agreed and signed Natural England (Application Document Ref: 7.2). This has been seen as the project of the project



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nding issues.

s agreement that:

species or interest features within designated sites; and not considered likely to result in significant ecological

hed Statement of Common Ground ('SoCG') with the been submitted for Deadline 2 of the Examination.

REF NO.	ORGANISA TION/PERS ON	RELEVANT REPRESENTATION	KEY ISSUES	APPLICANT'S CO
		providing a draft Habitats Regulations Assessment, which addressed our concerns. We responded to the Habitats Regulations Assessment advising that we concurred with the conclusion of no likely significant effects on European designated sites (our ref 226716, dated 6 October 2017). Natural England would be happy to work with Sembcorp Utilities to develop a Statement of Common Ground should one be deemed necessary.		
		1.3. These relevant representations contain a summary of what Natural England considers the main nature conservation and related issues to be in relation to the DCO application and indicate the principal submissions that it wishes to make at this point. Natural England will develop these points further as appropriate during the examination process. It may have further or additional points to make, particularly if further information about the project becomes available.		
		1.4. Natural England has worked successfully with Sembcorp Utilities UK Limited and there are no substantive outstanding matters.		
		2. The natural features potentially affected by this application		
		 2.1. The designated sites relevant to this application are: 2.1.1. Teesmouth and Cleveland Coast Special Protection Area (SPA) and Ramsar Site; North York Moors SPA and Special Area of Conservation (SAC). 2.1.2. Seaton Dunes and Common Site of Special Scientific Interest (SSSI); Lovell Hill Pools SSSI; Cowpen Marsh SSSI; Seal Sands SSSI; North York Moors SSSI; Redcar Rocks SSSI; Saltburn Gill SSSI; South Gare & Coatham Sands SSSI; Pinkney and Gerrick Woods SSSI; Tees and Hartlepool Foreshore and Wetlands SSSI. 2.2. The main issues raised by this application are changes in air quality that could impact upon habitats and species associated with designated sites. This also includes the planned extension to Teesmouth and Cleveland Coast SPA, which has not been formally consulted 		
		on and therefore has no official status yet as a potential SPA. Irrespective of this, the air quality assessments provided by the applicant have taken this proposed extension into account.		
		The air quality assessments (document ref: 6.3.12) and Environmental Statement (in particular Chapter 7 on air quality - document ref: 6.2.7 and Chapter 9 on ecology and nature conservation - document ref: 6.2.9) show that the process contributions with regards to oxides of nitrogen, acid deposition and nutrient nitrogen deposition are below the level considered to be significant for all designated sites. The applicant has also submitted a Habitats Regulations Assessment (document ref: 6.3.15) which concludes that the project is unlikely to have significant effects on European designated sites alone, or in combination with other projects.		
		The project site has no ecological interest of note and therefore no direct impacts on designated sites are anticipated.		
		Part II:		



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REF NO.	ORGANISA TION/PERS ON	RELEVANT REPRESENTATION	KEY ISSUES	APPLICANT'S CO
		NATURAL ENGLAND'S RELEVANT REPRESENTATIONS IN RESPECT OF TEES CCPP		
		 3. Planning Inspectorate Reference: EN010082 3.1. Natural England has no objection to the project for the following reasons: 3.1.1. The applicant has submitted a thorough Environmental Statement which we are satisfied demonstrates beyond reasonable scientific doubt that there would be no significant effect on the integrity of European sites. 3.1.2. Natural England is satisfied that the project is unlikely to have a significant impact on the nearby Sites of Special Scientific Interest. 3.1.3. The project site currently supports habitats of negligible ecological interest and all protected species issues (including any licensing requirements under the Habitats Regulations or the 1981 Act) have already been addressed. 		
8	Redcar & Cleveland Borough Council	As Leader of Redcar and Cleveland Council I write to express our support of the application by Sembcorp to build a 1700MW gas-fired generating station. Should this project be approved, its positive impact will reach far beyond the borders of Redcar and Cleveland, and the wider Tees Valley. The projected 1,000 jobs construction jobs over the 3 year build period as well as the 80 permanent jobs once the plant is operational can only have a positive impact on our local economy where current unemployment rates are well in excess of national averages at 3.5% versus 1.9%. Furthermore, many of the permanent jobs will be highly skilled, paying above the regional average salary which is crucially important as we seek to replace the well paid skilled jobs lost at SSI in 2015 and the coming skilled job losses announced by ICL UK Ltd. These will be further enhanced by the hundreds of supply chain jobs created over the 30 year lifespan of the power station benefitting the wider Tees Valley area and beyond. The project will bring back into use 15 hectares of brownfield land on Wilton International that previously housed a gas-fired power station and this will bring with it welcome business rates income to deliver much needed services to local residents and businesses. The £700m investment by a major overseas company sends out a very strong message that Redcar and Cleveland is a beacon for investment and will encourage further investment right the way through the energy supply chain. In terms of output the power plant will be able to satisfy the energy needs of 5m people in 1.3m households and go a long way towards meeting the overall energy demand of the UK. The application carries the full support of Redcar and Cleveland Council and I would urge you to consider it favourably.	Supportive Employment Economic benefit Previously development land – positive reuse Need for energy infrastructure	No response required. The support is acknowledged and grateful
9	North East Process Industry Cluster (NEPIC) Limited (North East Process Industry	NEPIC supports the Tees CCPP Project. The key advantage of the Project would be to provide competitively-priced energy for major users, making Wilton an attractive location for energy-intensive industries to locate. The Project enhances the offer provided from existing infrastructure on the Wilton site, and strongly compliments the work to be undertaken in the next few decades on the South Tees Development site, the biggest industrial regeneration opportunity in the UK for decades. The Tees CCPP Project is an important component in the plan to maintain and enhance the competitive position of Teesside as one of the most significant regions for energy intensive process engineering and manufacturing, and is a vital part of attracting more investment into the area.	Supportive Economic benefit	No response required. The support is acknowledged and grateful



COMMENTS

fully received.

fully received.

REF NO.	ORGANISA TION/PERS ON	RELEVANT REPRESENTATION	KEY ISSUES	APPLICANT'S CO
	Cluster (NEPIC) Limited)			
10	BNP Paribas on behalf of Royal Mail	 Royal Mail is responsible for providing efficient mail sorting and delivery nationally. As the Universal Service Provider under the Postal Services Act 2011, Royal Mail has a statutory duty to deliver mail to every residential and business address in the country, as well as collecting mail from all Post Offices and post boxes six days a week. Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is highly sensitive to changes in the capacity of the highway network. Royal Mail's a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services, thereby presenting a significant risk to Royal Mail's business. Royal Mail's Redear Delivery Office Malmo Court, Redear TSI0 SRD is circa 3.5 miles from the Tees CCPP site. There are seven other operational Royal Mail facilities within 15 miles. Every day, in exercising its statutory duties Royal Mail vehicles use all of the main roads that may potentially be affected by additional traffic arising from the construction of this proposed new power station. Royal Mail therefore wishes to ensure the protection of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations which may be adversely affected by the construction of this statutory obligations may be adversely affected by the construction of this statutory obligations may be adversely affected by the class reviewed the Traffic and Transport section of the ES (Volume 1 Chapter 10) and the TA at Annex 1.1 and draft CTMP at Annex 1.2. It is noted that Sembcorp "will ensure that local residents (and businesses) are kept informed" about temporary road closures. However, the DCO	Transport disruptions during construction phase – BNP/Royal Mail request the inclusion of two requirements: 1. That the DCO includes a requirement that Royal Mail is pre- consulted by Sembcorp on any proposed road closures/ diversions/ alternative access arrangements, hours of working and the content of the final CTMP. 2. That the DCO includes a requirement that the final CTMP includes provision for a mechanism to inform major road users about works affecting the local network (with particular regard to Royal Mail's distribution facilities in the vicinity of the DCO application site).	 The ES (Application Document Refs: 6.2 and 6.3) assumed that the by up to five years. For the purposes of the traffic and transport a different scenarios were assessed rather than adopting a single wore. Scenario One is the construction of a CCGT generating static single phase starting 'year 1'; and Scenario Two is the build of two trains with an output capacic each divided over two phases: Phase One starting year 1 and begins operation with construction concurrent with the operation by the scenarios, would result in no significant effects on the lo The impact on daily traffic flows would be less than 30% for both operational phases. Impacts on the Greystone and Westgate roun The percentage increase of HGVs would only exceed 10% on the phase of Scenario One, which considers the single construction p 1,700 MWe CCGT. It is notable, however, that this road is part of large volumes of traffic and heavy goods vehicles ('HGVs'). Notwithstanding the above, the Applicant has committed to develunder Requirement 15 of the draft DCO (Application Document I framework CTMP (Application Document Refs: 6.3.17), with whi consistent. Requirement 15 requires that the CTMP is approved to Although it is not proposed to list any other specific organisation document with RCBC it is envisaged that RCBC would consult of the second consult of t
11	Health and Safety Executive	HSE has made the suggestion earlier in the consultation process that it would be beneficial if the submission included information on the extent and severity of hazards from the proposed development, with the potential to impact on local populations, and/or the adjacent major hazard installations. As the proposed development would not be in scope of the Control of Major Accident Hazards (COMAH) Regulations, the safety concerns would be addressed under the Health and Safety at Work, etc Act 1974 and its relevant statutory provisions	DCO amendment	The Health and Safety Executive ('HSE') made the suggestion du would be beneficial if the DCO submission included information Project, with the potential to impact on local populations and/or a ES (Application Document Refs: 6.2 and 6.3) includes a specific (Application Document Ref: 6.2.15).



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t the Project may be constructed in two phases separated rt assessment (Application Document Ref: 6.2.10), two worst case scenario – namely:

ation with an output capacity of up to 1,700 MWe in a

acity of up to 850 MWe (aggregated output 1,700 MWe) nd Phase Two starting five years after the first train eration of the first 850 MW CCGT.

Project during both construction and operational phases, local road network and Strategic Road Network.

oth scenarios assessed, both during construction and bundabouts would be less than 10% for both scenarios. the A1053 Greystone Road for the peak construction in phase of a generating station with a capacity of up to rt of the Strategic Road Network and designed to carry

velop a construction traffic management plan ('CTMP') nt Ref: 2.1). Furthermore, the Application includes a which the plan submitted under Requirement 15 must be ed by RCBC prior to commencement of development. ons within requirement itself, as part of agreeing the lt other relevant parties, including Royal Mail.

during the Applicant's section 42 consultation that it on on the extent and severity of hazards from the or adjacent major hazard installations. Accordingly, the fic chapter on major accidents and natural disasters

REF NO.	ORGANISA TION/PERS ON	RELEVANT REPRESENTATION	KEY ISSUES	APPLICANT'S CO
		(RSPs). In particular this consideration should be discharged under a management of Health and Safety at Work Regulations requirement to prepare a suitable and sufficient risk assessment for proposed activities, identifying hazards and taking appropriate measures to manage and control the risks. Paragraph 30 of the draft DCO refers to such an assessment being submitted and approved by the relevant planning authority in consultation with HSE, under GB's health and safety legislation. HSE does not have a role in approving risk or hazard assessments unless the circumstances are covered by specific regulations. As this proposal is not covered by such regulations, HSE does not have a formal role and this wording should be amended.		Although the Project will not be a COMAH registered site, and the policy or a safety report for the operation of the power station und consultation zone of the adjacent Ensus plant (a COMAH facility natural disasters included this facility and other infrastructure, all area. The assessment concluded that given the embedded mitigation and Project, it is considered that the likely risks associated with event reasonably practicable ('ALARP'). Accordingly, it is considered environmental effects arising from the vulnerability of the Project. The Applicant has amended Requirement 30 to remove the words <i>Executive</i> ".
12	Ben Houchen (Tees Valley Mayor) Tees Valley Combined Authority (Tees Valley Combined Authority)	Sembcorp's plan for a gas-fired power station is excellent news for the region and I am backing the project wholeheartedly. Wilton is a prime location for the site and this scheme would undoubtedly make the wider area a richer prospect for further sustained investment. This will help to support the Tees Valley's Strategic Economic Plan. It will create good quality jobs and aid with economic regeneration in a project of national importance that will keep people talking about Tees Valley.	Supportive Economic benefit	No response required. The support is acknowledged and grateful



OMMENTS

I therefore does not require a major accident prevention under the COMAH regulations, it is within the ity). Our assessments of the risk of major accidents and along with environmental characteristics of the study

and management procedures proposed as part of the ents occurring will be managed to be as low as red that there will not be any likely significant ject to major accidents and natural disasters.

rds "in consultation with the Health and Safety

fully received.