

National Infrastructure Planning  
Net Zero Teesside DCO Case Team

BY EMAIL:  
NetZeroTeessideProject@planninginspectorate.gov.uk

Your Ref  
Unique Reference: 20029934  
Our Ref  
RAQ/TGH/203316.0001  
Date  
29 April 2022

Dear Sir or Madam

**Application by Net Zero Teesside Power Limited and Net Zero North Sea Storage Limited (NZN) for an Order Granting Development Consent for the Net Zero Teesside Project (the Project)**

**South Tees Development Corporation (STDC) - Request to attend Preliminary Meeting and Hearings**

**(i) Preliminary Meeting**

Following receipt of the Rule 6 letter issued by the Examining Authority on 11 April 2022, STDC hereby requests attendance in person and permission to speak at the Preliminary Meeting on Tuesday 10 May 2022.

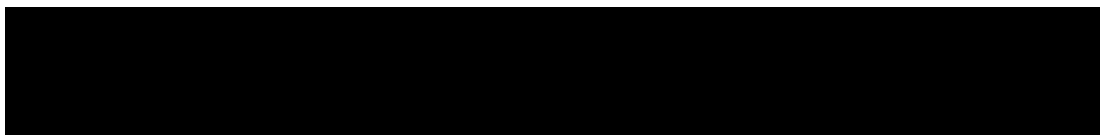
The following persons will be present on behalf of STDC:

- Mark Reynolds (STDC);
- Matt Johnson (STDC);
- Tom Henderson (BDB Pitmans Solicitors for STDC and lead advocate); and
- Rahil Haq (BDB Pitmans Solicitors for STDC)

At the Preliminary Meeting, STDC would like to address agenda item 3: Initial Assessment of Principal Issues as set out at Annex C of the Rule 6 letter. STDC would like to raise the following specific points on the issues at Annex C:

- **Issue 4:** Compulsory Acquisition and Temporary Possession: *Whether all reasonable alternatives to compulsory acquisition and temporary possession have been fully explored.*

STDC's understanding from discussions with NZT had been that further changes to the Project would be made in order to accommodate STDC concerns around compulsory acquisition and



temporary possession. STDC requests clarity on this matter from the Applicant. This matter also has implications for the proposed examination timetable (agenda item 5 of the Preliminary Meeting).

- **Issue 6:** Draft Development Consent Order: *Relationships with other projects and consents including connections to the CO2 gathering network; and Agenda Item 11: Proposed Development, Site Selection Infrastructure and Cumulative and Combined Effects: The relationship with and implications for existing and proposed neighbouring uses or infrastructure and other proposed major projects including the offshore elements of the NZT project, Zerocarbon Humber, East Coast Cluster and the Hornsea Project Four Offshore Wind Farm*

While STDC is not in discussion with any other promoters of Nationally Significant Infrastructure Projects under the Planning Act 2008 regime in respect of its land, STDC is actively in discussions about the bringing forward of other (non-NSIP) major infrastructure projects with far reaching economic benefits for the region.

- **Issue 13:** Traffic and Transport and Public Rights of Way: *Alternative access points.*

STDC has consistently made clear that alternatives to the access at Tees Dock Road (plot 279) are available to NZT. STDC continues to require this land to be removed from the scope of the DCO and for NZT to consider the reasonable alternatives available to them – for the avoidance of doubt, STDC requests that this be considered as a principal issue.

- **Construction waste management:** Currently this issue is not specifically referred to. STDC's relevant representation questioned the lack of detail on the quantity, location and duration of storage of arisings from the tunnel boring activities (in addition to wider waste management impacts from the overall construction phase) and how this may impact availability of Teesworks' land for other development. STDC requests that specific reference to this issue be included.

STDC would like to address agenda item 4: Procedural Decisions taken by the ExA – Annex I. STDC would like to make the following points on Annex I:

- 2. Statements of Common Ground (SoCGs)

STDC note that SoCGs are required from STDC/Tees Valley Combined Authority (TVCA), and Teesworks Limited. STDC is a mayoral development corporation and is a sister company to the Tees Valley Combined Authority. Teesworks Limited is a private company in which STDC retains an interest. STDC represents both TVCA and Teesworks in respect of the DCO Project and can confirm that only a single SoCG is required.

### **(ii) ISH1 and 2 and CAH1**

STDC hereby also requests that the following people are permitted to attend (in person) and speak at each of the following hearings:

Attendees:

- Mark Reynolds (STDC);
- Matt Johnson (STDC);
- Tom Henderson (BDB Pitmans LLP, Solicitors for STDC and lead advocate); and
- Rahil Haq (BDB Pitmans LLP, Solicitors for STDC)

Hearings:

- Issue Specific Hearing into the scope of the Proposed Development (ISH1) on 10 May 2022;
- Issue Specific Hearing into the draft Development Consent Order (dDCO) (ISH2) on 11 May 2022; and
- Compulsory Acquisition Hearing (CAH1) on 11 May 2022.

STDC notes that the Examining Authority has requested STDC's attendance at these hearings. STDC wishes to reserve the right to comment on matters relevant to its interests, including but not limited to: proposed use of STDC land for the Project (both compulsory acquisition and temporary possession) and reasonable alternatives, and DCO drafting (including requirements and protective provisions).

Yours faithfully

[Redacted signature block]

**BDB Pitmans LLP**

T [Redacted]  
[Redacted]  
[Redacted]