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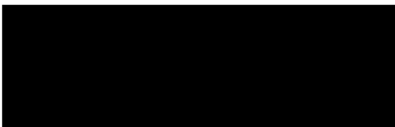


Dear Sirs/Madams

Planning Act 2008
Application by Net Zero Teesside Power Limited and Net Zero North Sea Storage Limited for an Order Granting Development Consent for the Net Zero Teesside Project

Please find enclosed comments on the responses to the Examining Authority's First Written Questions – EXQ1 submitted on behalf of our client Northumbrian Water Limited "NWL".

Yours sincerely



Birketts LLP



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IS 700564

NWL's Response to the Applicants' Response to ExA's ExQ1 – Deadline 3

EXQ1	Question	Applicant's response	NWL's Response
WE.1.1	<p>Section 9.5 of the ES [APP-091] outlines that the Proposed Development would have a significant demand for water.</p> <p>i) The Applicants are asked to provide an estimate of the likely water volumes required during construction, operation and decommissioning.</p> <p>ii) Has agreement been reached with NWL to provide this water?</p> <p>iii) Can the Applicants confirm whether there is an alternative proposal for water supply in the event that agreement is not reached with Northumbrian Water Limited and, if so, explain what the alternative is and whether it has been assessed within the ES? It is noted that paragraph 9.6.66 of ES Volume 1, Chapter 9 [APP-091] refers to abstraction from the Tee</p>	<p>i) Paragraph 9.6.64 of Chapter 9 of the ES [APP-091] states that the Proposed Development will have an operational water demand of up to 82M l/d. Detail of construction and decommissioning water requirements are not available at this stage. However, there are not any unusually large water requirements envisaged during these phases of the Proposed Development that would require significant water supply.</p> <p>ii) The Applicants are currently in discussions with STDC for a raw water supply agreement that includes providing a connection to the Teesworks supply up to the PCC site boundary. Northumbrian Water Limited (NWL) would be the supplier of raw water for cooling to STDC.</p> <p>iii) Water supply during operation is to be from the existing NWL raw water feed. If an agreement is not reached with STDC on a raw water supply then the Applicants will open supply discussions directly with NWL. Initial discussions have been held with NWL confirming that the above water demand can be supplied through the existing NWL raw water</p>	<p>i) In relation to both raw and potable water, the Applicants have not yet provided NWL with an accurate operational water demand profile for each year of the Proposed Development and have stated that detail of construction and decommissioning water requirements are not available at this stage. In relation to both the operational water and construction requirements, NWL require an estimate of the demand before it can comment on whether the water volumes can be provided for the Proposed Development.</p> <p>ii) Discussions have been continuing between the Applicants and NWL but NWL cannot at this stage confirm agreement.</p>

		<p>feed to the former steelworks. Reference to the Tees Estuary abstraction in paragraph 9.6.66 is an error and no abstraction of water from the Tees Estuary is proposed and therefore this has not been assessed within Chapter 9 [APP-091]. This option was discounted after the Preliminary Environmental Information (PEI) Report was issued for formal consultation. No alternative sources of water are under consideration or considered to be necessary.</p>	
WE.1.2	<p>Information is provided in Section 9.5 of the ES [APP-091] regarding potential discharges from the site.</p> <p>The Applicants are asked to provide an estimate of the likely volume of discharge from the site at all stages and the likely composition of this.</p> <p>Has NWL confirmed that Bran Sands and/or Marske-by-the-Sea Wastewater Treatment Works (WwTW) have capacity to treat the discharges?</p>	<p>Discharge rates for the operational process streams will be approximately 0.07 m³/s. Uncontaminated surface water runoff discharge does not require attenuation given that it is proposed to be discharged to the sea via the outfall. The quality of the effluent from the Proposed Development is currently under assessment as part of the FEED design. Modelling of mixing zones for effluent discharge from the Proposed Development is currently being undertaken by the Applicants using precautionary effluent composition values, and this will be submitted as part of the Applicants' Deadline 4 submission.</p> <p>NWL has confirmed that Bran Sands and/or Marske-by-the-Sea Wastewater Treatment Works (WwTW) have capacity to treat the discharges as noted in paragraph 3.1.5 of the Statement of</p>	<p>Discussions have been continuing between the Applicants and NWL but NWL cannot at this stage agree that all of the proposed Applicants' effluent can be treated as it has not been provided with sufficient information to come to a conclusion in relation to either the volume or composition of the effluent. NWL await receipt of the information to be submitted at Deadline 4.</p> <p>NWL can confirm that Marske-by-the-sea Sewerage Treatment Works (STW) will <u>not</u> have capacity to treat the operational discharges and the SoCG has been amended to reflect this.</p>

		Common Ground with NWL submitted at Deadline 1 [REP1-015].	
WE.1.6 iv)	The EA suggests that waterbody quality could be improved if wastewater destined for Dabholm Gut, including that from beyond the site, was diverted to Tees Bay via the discharge pipeline. What consideration has been given to this concept?	The Proposed Development does not accommodate the discharge of effluent from Bran Sands WwTW to Tees Bay which originates from beyond the NZT site. Any change to discharge arrangements from Bran Sands WwTW would need to be the subject of separate discussions between the EA and NWL	Discussions are ongoing.
WE.1.22	Paragraph 4.3.32 of the Chapter 4 of the ES [AS-019] describes the options for wastewater treatment. When will a decision be taken about which option to adopt?	The Applicants are in discussion with NWL on the option for wastewater treatment at the Bran Sands WwTP. A decision on this option is expected to be made prior to the end of Examination. The Applicants are continuing to work with Natural England and the Environment Agency on this option as it is linked to the consideration of compliance with the Natural England position on nutrient neutrality.	Discussions are ongoing.
WE.1.25	Can the Applicants clarify the reference at paragraph 9.4.4 of Appendix 9C [APP-254] to potential indirect effects to more distant receptors through increased demand on potable water supplies and foul water treatment? As part of this, please confirm whether there are any additional receptors of relevance and illustrate their location on a plan as relevant.	Paragraph 9.4.4 of Appendix 9C [APP-254] is acknowledging that there can be potential effects to the water environment relating to third parties which are not within the direct control of the Applicants. For instance, where foul water is discharged from a WwTW to a watercourse, the quality of that water is subject to treatment applied by the water company in line with their environmental permit.	Discussions are still ongoing with the Applicants in relation to the proposal to discharge foul water to Marske-by-the-Sea STW. No agreement has yet been reached.

		<p>Similarly, water supplied via a third party is again outside the Applicants' control, and there could be indirect impacts on the waterbodies providing that source water. However, the water industry is heavily regulated and significant effects would not be expected to occur given this regulation, and in addition the Applicants have no control over or knowledge of where water would be sourced from (and which is likely to vary over time). Given that water is to be supplied through an agreement with NWL and that foul water is proposed to be discharged to Marske-by-the-Sea WwTW, there are no additional receptors of relevance that have not already been assessed within the ES [APP-091].</p>	
WE.1.26	<p>Can the Applicants and NWL provide an update on the status of the agreement for treatment of foul water arising from the construction and operation of the Proposed Development?</p> <p>Can NWL comment on the capacity of the consent limits for additional foul water at Marske-by-the-Sea?</p>	<p>The Applicants are working with the South Tees Development Corporation (STDC) and Teesworks who will provide services relating to the handling of domestic sewage through the use and (where required) upgrade of existing assets on the site. NWL and the Applicants have discussed the capacity of Marske-by-the-Sea WwTW being sufficient to treat the population equivalent expected from the operational Proposed Development based on the relatively low operational workforce relative to that of the former steelworks.</p> <p>Should a foul sewer connection not be available, the Applicants would seek to install an appropriate</p>	<p>Discussions are continuing between the Applicants and NWL as to volume, but Marske-by-the-sea STW may be capable of treating the domestic foul water discharges arising from the construction and operation of the Proposed Development. NWL requires additional information in relation to expected volumes before it can come to a conclusion on the existing capacity of assets on site.</p> <p>Agreement will need to be reached with NWL in principle in relation to treatment of the operational discharges from the Proposed Development despite discussions with STDC.</p>

package treatment plant for operational requirements.

Additional traffic movements associated with this would be negligible and would have no impact on the Transportation Assessment.