

The Planning Inspectorate  
Temple Quay House Temple Quay  
Bristol  
Avon  
BS1 6PN

**Our ref:** NA/2022/115883/06-L01  
**Your ref:** NET ZERO TEESSIDE  
PROJECT CONS

**Date:** 20 September 2022

Dear Sir/Madam

**EN010103: THE NET ZERO TEESSIDE NATIONALLY SIGNIFICANT  
INFRASTRUCTURE PROJECT. DEADLINE 8 SUBMISSIONS. LAND IN THE  
VICINITY OF THE SSI STEEL WORKS SITE, REDCAR, TEESSIDE, TS10 5QW**

Please find enclosed our representations for Deadline 8 for this Development  
Consent Order (DCO) on behalf of the Environment Agency (EA).

Please do not hesitate to contact me if you have any questions regarding this  
letter.

Yours faithfully

**Lucy Mo**  
**Planning Technical Specialist - Sustainable Places**

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**Environment Agency Written Representations**

**Deadline 7 Submission - 9.32 Applicants' Comments on Deadline 6 Submissions [REP7-009]**

Section 8.2.18

We welcome the changes made to Requirement 13 (Contaminated Land and Groundwater). However, the proposed changes as outlined in REP6 122 (Document Ref 9.28 Applicants' Comments on Deadline 5 Submissions) do not fully address our comments provided as part of the Deadline 6 Submissions (REP7-012).

Section 8.2.21

It is stated by the Applicant that additional ground investigation information and risk assessments will be in the form of a Supplementary Interpretative Ground Investigation Report (GIR) rather than an update to the current Interpretative Ground Investigation Report (GIR) (REP2-043). Ground investigation is an iterative process with further information gathered to identify baseline conditions prevailing at the site and inform a controlled waters risk assessment. This should involve the review and consideration of **all** the factual data collected across the site and the identification of any trends / patterns or otherwise. Irrespective of how the works are to be reported, the Applicant needs to ensure that all of the factual ground investigation data is taken into account to inform the risk assessment and that all our previous comments on the original GIR (REP2-043), (REP3-027) and our feedback dated 28 July 2022 on the Applicants response dated 21 July 2022, are taken into consideration and addressed.

**Deadline 7 Submission - 6.4.49 Environmental Statement: Volume III Appendix 25A: Commitments Register (Clean) [REP7-002]**

With regards to Table 25-1: Commitments Register, we would support the inclusion of the following references:

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Reference/chapter	Page number	Proposed references
ES Chapter 9 - Surface Water, Flood Risk and Water Resources	25-17	An Environmental Permit from the Environment Agency is required.
ES Chapter 5 -Construction Programme and Management, ES Appendix 5A – Framework CEMP & ES Chapter 10 - Geology, Hydrogeology and Contaminated Land	25-11, 25-31	Remediation of localised contamination within temporary laydown / compound areas caused by undertaker’s activities as accommodated for by Requirements 13 and 25.
ES Chapter 10 - Geology, Hydrogeology and Contaminated Land  [REDACTED]	25-29	<ul style="list-style-type: none"> <li>- Ground investigation should be specified in accordance with UK Specification for Ground Investigation 2022. As part of ground investigation, a minimum of three monitoring rounds (level <b>and</b> quality) should be undertaken.</li> <li>- Following phasing of ground investigation, an interpretative ground investigation including Quantitative Risk Assessment (QRA) in line with CIRIA C552 (and Detailed Quantitative Risk Assessment if required) should be prepared. This should take into account all factual ground investigation information.</li> <li>- As part of ground investigation, finger printing of the different types of slag encountered, will be undertaken to confirm the full chemical signature of these materials.</li> </ul>
ES Chapter 10 - Geology, Hydrogeology and Contaminated Land	25-31, 25-32 and 25-33	The Materials Management Plan will consider excavated materials and suitability of these materials for reuse.
ES Appendix 5A - Framework CEMP	25-59	The CEMP and final CEMP needs to include the preparation and inclusion



		of a groundwater monitoring plan and land quality monitoring plan (as referenced in 25-32).
ES Appendices 5A - Framework CEMP, 9C - WFD Assessment	25-64	Reference to Land Contamination Risk Management Guidance (this has replaced CLR 11).

Page 25-32 makes reference to a groundwater quality monitoring plan and a 'land quality monitoring plan' as part of the Construction Environmental Management Plan (CEMP). We would welcome clarity on the scope of this land quality monitoring plan, and how it relates to Requirement 13.

[Redacted]

