



Department for
Energy Security
& Net Zero

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energyinfrastructureplanning@energysecurity.gov.uk

To:
Net Zero Teesside Power Limited
Net Zero North Sea Storage Limited

Our Ref: EN010103

Date: 30 November 2023

Dear Sir or Madam,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by Net Zero Teesside Power Limited and Net Zero North Sea Storage Limited (“the Applicants”) for an Order granting Development Consent for the proposed Net Zero Teesside project (“the Proposed Development”)

1. In a letter dated 6 October 2023¹ and in response to representations from Climate Emergency Policy and Planning (CEPP) sent to the Secretary of State on 6 and 12 September 2023², the Applicants revised their figures in Table 3 of Appendix 6 to the addendum submitted to the Secretary of State on 4 August concerning the Environmental Statement for the Wider Net Zero Teesside Project³. These figures show the contextualisation of residual operational emissions compared to the relevant Carbon Budget Delivery Plan sectoral carbon budgets. As a result of the

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010103/EN010103-002868-Net%20Zero%20Teesside%20Power%20Limited%20and%20Net%20Zero%20North%20Sea%20Storage%20Limited%20-%20Cover%20Letter%20-%20Response%20to%20the%20SoS%20Consultation%20letter%20dated%2022%20September%202023.pdf>

² <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010103/EN010103-002848-Dr%20Andrew%20Boswell%20on%20behalf%20of%20Climate%20Emergency%20Policy%20and%20Planning.pdf>
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010103/EN010103-002862-Dr%20Andrew%20Boswell.pdf>

³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010103/EN010103-002814-NZT%20DCO%206.6%20-%20Appendix%206%20Contextualisation%20against%20CBDP%20and%20Draft%20Revised%20NPS%20response.pdf>

figures being revised, the estimated residual emissions and percentage contributions for the Power Sector have all increased.

2. In the same letter the Applicants responded to concerns raised by CEPP (in paragraphs 4.4 and 4.5 of CEPP's letter of 6 September 2023) regarding a double counting error in [REP6-123]. The Secretary of State does not consider that the Applicants' response adequately addresses the potential double counting error identified by CEPP. Specifically, **the Applicants** should respond to CEPP's statement that the figure of 16,782,184 tCO₂e for onshore operational emissions (Table 3-1) is that which is remaining **after** the 90% carbon capture assumption, and that subtracting carbon captured again (in Table 3-4) double counts the reduction, resulting in a calculation error. **The Applicants** should respond with clarification in this regard and, if necessary, correct and update their assessment of GHG emissions and evaluation of significance in [REP6-123], and otherwise, accordingly.
3. **The Applicants are requested to comment on the issues detailed above. A response should be sent via email only to:**
netzeroteessideproject@planninginspectorate.gov.uk **by 23.59 on 14 December 2023.** Responses will be published on the Net Zero Teesside project page of the National Infrastructure Planning website as soon as possible after **14 December 2023.**
4. This letter is without prejudice to the Secretary of State's consideration of whether to grant or withhold development consent for the proposed development. Nothing in this letter is to be taken to imply what the eventual decision might be or what final conclusions the Secretary of State may reach on any particular issue which is relevant to the determination of the application.

Yours faithfully



John Wheadon

Head of Energy Infrastructure Planning Delivery