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Stephanie Newman Environmental Service Planning Inspectorate Operations Group 3 Temple Quay House 2 The Square Bristol, BS1 6PN

Date: 25 August 2023 Our ref: 63262/01/AGR/GB/26859733v1 Your ref: EN010150-000006

Dear Ms Newman

## **Response by South Tees Development Corporation to EIA Scoping Report for the Lighthouse Green Fuels Project**

We write in reference to your letter dated 25 July 2023 inviting South Tees Development Corporation (STDC) to comment on the Environmental Impact Assessment ('EIA') Scoping Report in respect of the Development Consent Order (DCO) being prepared for the Lighthouse Green Fuels (LGF) Project. This letter comprises STDC's formal response to your request for comments on the EIA Scoping Report of the LGF Project.

As a freehold owner, STDC has significant land interests in the land which is located at Teesworks, located to the north of Grangetown and the A66 and the River Tees. STDC/Teesworks was established as the public sector vehicle for delivering area-wide, economic regeneration in the area to augment the wider economic growth plans of the Tees Valley. It delivers this regeneration through its South Tees Regeneration Programme. It has also prepared the South Tees Regeneration Masterplan to support development through the local planning and planning application process. The Masterplan sets out the vision for transforming the STDC/Teesworks area into a world-class, modern, large-scale industrial business park. It provides a flexible development framework where land plots can be established in a variety of sizes to meet different occupier needs in the most efficient manner possible. The Masterplan identifies five distinct development 'zones' within the STDC/Teesworks area. The development site which is located immediately opposite the LGF Project is Southbank, located within the South Industrial Zone.

The South Industrial Zone has planning permission for port related uses, offshore energy industries, materials processing and manufacturing and energy generation. More specifically, planning permission has been granted for demolition and engineering operations associated with ground remediation and development of general industry (Use Class B2) and storage or distribution facilities (Use Class B8) with office accommodation (Use Class E), HGV and car parking, works to watercourse including realignment and associated infrastructure works. It is noted that many of these planning permissions

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fall within 2km of the LGF Project and therefore there is the potential for the LDF Project to affect sensitive receptors within the STDC/Teesworks Masterplan area.

We have reviewed the EIA Scoping Report and wish to offer the following comments:

- 1 We agree with the topics proposed to be scoped into the ES, as set out in Chapters 5-21 of the EIA Scoping Report.
- 2 We have undertaken a high-level review of the methodologies for each of the technical assessments provided within Chapter 5-21 of the EIA Scoping Report and have no specific comments to make except in respect of Cumulative Effects which are set out below.
- 3 We note Chapter 21 Cumulative Effects of the Scoping Report addresses the proposed methodology for assessing the cumulative effects of the LGF Project. Paragraph 21.3.14 sets out that in respect of 'Other Development' to be included in the cumulative list a series of criteria will be applied in order to determine the long-list of cumulative projects. This includes permitted applications and submitted applications (via local authorities) which are yet to be determined or are subject to appeal. There is the potential for new and/or shared sensitive receptors on which there may be the potential for cumulative effects. STDC/Teesworks wishes to engage further with the LGF Project on this matter to ensure that the full list of cumulative schemes is identified that the scope of any cumulative assessment and mitigation is appropriate, and to ensure that the development proposed within the STDC/Teesworks Masterplan is assessed accurately within any subsequent Environmental Statement.

We acknowledge that the LGF Project is in the early stages of development and that the detail provided in the EIA Scoping Report requires further refinement and clarity prior to consultation on the Preliminary Environmental Impact (PEI) Report which is expected in due course. We look forward to being consulted in due course.

Yours sincerely

**Gayle Black** Planning Director BSc (Hons) MSc MRTPI REIA