



PROPERTY TRANSPORT INVESTMENT DEVELOPMENT

Natara Global Limited
Zinc Works Road
North Gare
Seaton Carew
TS25 2DT

National Infrastructure
Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

13th August 2024

Dear Sir,

**APPLICATION BY H2 TEESSIDE LIMITED FOR AN ORDER GRANTING
DEVELOPMENT CONSENT FOR THE HSTEESIDE PROJECT**

INTERESTED PARTY REFERENCE NUMBER: 20049369

NATARA GLOBAL LIMITED

We write on behalf of our client Natara Global Limited (Interested Party Reference number: 20049369) in response to the letter dated 31st July 2024 (your Ref: EN070009) (the 'Rule 6' letter) regarding an Invitation to the Preliminary Meeting, notification of Procedural Decisions and Notification of Hearings.

The purpose of this correspondence is to notify the Examining Authority (ExA) that our client wishes to actively participate in the Issues Specific Hearing 1 (ISH1) on 28th August 2024 at 2pm.

We have reviewed the draft agenda for this hearing (Annex E to the 'Rule 6' letter) and confirm that we wish to speak on items 3 and 4.

The topics we would like to raise relate to need for our Client's Property and its inclusion within the Order Limits and how the powers sought by the Promotor in respect of compulsory purchase and temporary possession over the Property have been justified through the level of design development undertaken to date. Our view is that the level of design is currently insufficient and further work is

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required to develop options which avoid and/or mitigate the potentially significant effects on our client's operating business.

The documents in the Examination Library we may wish to refer to include:

- APP-008 2.2 Land Plans
- APP-010 2.4 Works Plans
- APP-056 6.2.4 ES Vol I Chapter 4 Proposed Development

The reason for this request to participate in ISH1 and our rationale for the topics to be raised is further explained below.

Despite various written submissions to the Promotor's Project team, including as set out in our Relevant Representation to this DCO application, our client's position remains that its concerns regarding the impact of the Project on its business have not been adequately considered or addressed.

Specifically, as proposed, the rights and powers sought by the Promotor in respect of temporary possession and compulsory acquisition over the Property for construction and ongoing operation of the Project will significantly impede the ability of the business to operate such that at worst, a complete stop on manufacturing operations at this site would be unavoidable for at least a 4 week period during the construction phase. The consequential disruption of supply to our client's customers will have a significant financial impact, with the potential for lost sales having further serious longer term knock-on effects. Such an impact must be avoided.

Our client has asked the Promotor's Project team to engage with it to better understand its concerns and explore options as to how the adverse effects may be mitigated, including through potential alternative uses of land, construction methods and/or how design may be reviewed to avoid the currently inevitable disruption and interference with our client's access and yard.

Since submitting our Relevant Representation we understand that the Promotor is now willing to do this and discussions regarding an initial meeting have started. We welcome the ExA's direction that a Statement of Common Ground (SoCG) be prepared between the Promotor and our client which we hope will help to drive forward collaboration and the narrowing of issues of concern/dispute. It is noted that we will be looking to ensure that any agreements between the parties which affect the operation of the business are secured by specific Protective Provisions in the DCO.

However until such time that our client's concerns have been adequately considered and resolved through meaningful engagement it remains our client's position that it maintains its objection to the Project and DCO application as currently proposed. We submit that the Applicant / Promotor has not provided sufficient justification for the temporary possession and compulsory purchase of the Property, including adequate consideration of alternatives



which would avoid the need for the land, to outweigh the disproportionate significant adverse effects on our client's operating business.

We trust that this request for our client's participation in ISH 1 will be reviewed accordingly and we look forward to confirmation of this in due course.

Yours sincerely

Sarah Gillie
Partner
Baker Rose Consulting LLP
Contact email: [REDACTED]

cc.

Nick Pennel, Natara Global Ltd
Yoram Knoop, Natara Global Ltd