

Submission ID: 20049383

Submission of suggested locations to be included in the Accompanied Site Inspection for H2Teesside Project

- 1.1 We act on behalf of SABIC UK Petrochemicals Limited (**SABIC**) in relation to the H2Teesside Project application for Development Consent (**Scheme**) submitted by H2 Teesside Limited (**Applicant**).
- 1.2 We write to suggest the following locations to visit as part of an Accompanied Site Inspection (**ASI**) by the Examining Authority to assess the potential impact of the Scheme proposals on SABIC. These locations are referenced in the relevant representation submitted by SABIC in connection with the Scheme:
 - 1.2.1 Brine Fields and Reservoirs (identified as site 5. in relevant representation)
 - 1.2.2 North Tees Site (identified as site 2. in relevant representation)
 - 1.2.3 Wilton International (identified as site 1. in relevant representation)

2. The locations:



3. The issues to be observed at the locations

- 3.1 It is important that the ASI includes these locations in order to allow for practical understanding to be gained in connection with our client's relevant representation including the existing SABIC activity undertaken at the sites, the way in which the land at the locations is used and the security management arrangements at the locations.

4. The accessibility of the locations via public land

4.1 We understand that all three locations can be accessed via public land:

- 4.1.1 The Brine Fields and Reservoirs location is accessible via a cavity entrance from the public road;
- 4.1.2 The North Tees Site location is accessible via the North Tees gatehouse at the end of Huntsman Drive;
- 4.1.3 The Wilton International location is accessible via the Wilton Visitor induction centre.

5. Reasons for requesting inclusion of the locations

5.1 We request that the sites are included in the ASI for the following reasons:

5.1.1 **The Brine Fields and Reservoirs location** (paragraphs 5(a)-(d) of the relevant representation)

- (a) These facilities are an integral part of SABIC's operations and must remain operational at all times. They include access roadways and pipe corridors which SABIC will require continuous access to at all times.
- (b) Plot 5/97 is a laydown and construction area which is important to SABIC's operations on site.
- (c) Plot 6.3 is very close to an existing borehole.

5.1.2 **The North Tees Site location** (paragraphs 2(a)-(d) of the relevant representation)

- (a) The Development Consent Order (**Order**) would allow the Applicant to take temporary possession of land all the way around the North Tees site, thereby preventing access. This includes Huntsman Way, the main site access.
- (b) The Order would allow the Applicant to take possession of land which is required for integrity of the site's COMAH plan and to ensure that SABIC can fulfil its responsibilities to HM Treasury to ensure the safety of the goods held in the bonded warehouse which have not yet been subject to excise duties. This includes the main access into the site from Huntsman Way, and the perimeter of the site in a number of locations.
- (c) The Order would allow compulsory acquisition of Plot 10/9 and the right to take temporary possession of the adjacent parts of Plot 10/10. Plot 10/10 contains SABIC's air compressors and water purification plant, and is essential for SABIC's operations.
- (d) The Order would allow taking of temporary exclusive possession of and rights in Plots 10/14, 10/15 and 10/16 as well as the adjoining part of Plot 10/10. This area contains live SABIC equipment, as well as essential access to pipeline corridors and CF Fertilisers Ammonia Storage facility (via an access route which SABIC is responsible for).

5.1.3 **The Wilton International location** (paragraphs 1(a)-(d) of the relevant representation)

- (a) The Order would allow the power to take temporary possession of the Wilton Site roads to the exclusion of SABIC, preventing access to its assets: both in terms of general access to its assets across the site and in particular along the northern access road to its ethylene cracker (Plot 20/6).

- (b) The Order would allow the taking of temporary exclusive possession of Plots 19/10 and 19/13 and adjacent plots. This is in active use by SABIC for storage and general use.
- (c) The Order would allow the taking of temporary exclusive possession of Plot 20/13 and adjacent plots. This has underground storage cavities, above and below ground pipework. This is also the location where SABIC's (above-ground) system 32 goes underground and becomes the Trans-Pennine Ethylene Pipeline which is a major accident hazard pipeline.
- (d) The Order would allow the taking of temporary exclusive possession of and rights in Plot 20/10. This covers approximately half of SABIC's B7 tank area, required by SABIC for, and integral to, its operations.