

The Planning Inspectorate
Temple Quay House
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Bristol, BS1 6PN

Your Ref
URN: 20049389
Our Ref
RAQ/TGH/207930.0002
Date
17 September 2024

By Email h2teesside@planninginspectorate.gov.uk

Dear Sir or Madam

Planning Act 2008
Application by H2 Teesside Limited for an Order Granting Development Consent for
the H2 Teesside Project
Deadline 1 Submissions - South Tees Group (STG)

On behalf of the South Tees Group (STG), we enclose STG's Written Summary of Submissions at Issue Specific Hearing (ISH) 1 on 28 August 2024.

We confirm that:

- STG wishes to attend the relevant accompanied site visit(s). STG will review the draft itinerary submitted by the Applicant at Deadline 1 and consider whether it has any comments;
- STG requests a Compulsory Acquisition Hearing and hereby provides notice that it would like to speak at the next Compulsory Acquisition Hearings scheduled to take place during the week commencing 11 November 2024; and
- South Tees Development Corporation (STDC, part of the STG) confirms that it does not intend to submit a Local Impact Report. It should be noted that STDC does not retain any local planning authority powers. We understand that Redcar & Cleveland Council, as local planning authority, are preparing a Local Impact Report.

At Procedural Deadline 1, the Applicant submitted its Change Notification Report [PDA-019]. STG can confirm that it has since received a formal consultation letter on the proposed changes. STG intends to respond directly to the Applicant's consultation, however a summary of STG's initial comments are set out in a post hearing note at Agenda item 3(1) of STG's Written Summary of Submissions at ISH 1.

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Finally, STG notes that the Examining Authority requested a Statement of Common Ground (SoCG) between the Applicant and STG at Deadline 1. Accordingly, STG had expected to receive a draft SoCG from the Applicant well in advance of Deadline 1, allowing STG to carry out a review and add comments.

However, STG is disappointed to report that (at the time of writing) it has not been provided with any draft, despite having chased the Applicant for the same and having been advised that a draft would be available by 11 September 2024. At ISH1 STG's representative noted that an increase in the frequency and intensity of engagement from the Applicant was required, but this is yet to materialise. Providing documents late in this manner is not acceptable as it impairs STG's ability to take part effectively in the examination. STG notes that the guidance document *Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (April 2024)* encourages SoCGs to be prepared during the pre-application period and included in the DCO application, which puts into sharp relief the absence of a SoCG with STG, the major affected landowner, at this stage of the process.

STG respectfully requests that the Examining Authority remind the Applicant of the need to share joint documents sufficiently in advance of examination deadlines.

Yours faithfully

A large black rectangular redaction box covering the signature area.

Tom Henderson
Partner
For and on behalf of BDB Pitmans LLP

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enc STG Deadline 1 submission: Written Summary of Submissions at Issue Specific Hearing
1