

## H2Teesside DCO Examination

### South Tees Group (20049389) – Deadline 2 Submissions

#### Written Representations and Response to Deadline 1 Submissions

- 1 For reasons of efficiency and to reduce repetition, STG has consolidated its written representations and response to Deadline 1 comments into a single submission at Deadline 2.
- 2 By way of brief background, H2 Teesside Limited (**the Applicant**) made a Development Consent Order (**DCO**) application for its H2Teesside project on 25 March 2024. The South Tees Group (**STG**) has various property interests in a substantial proportion of the land in and around the Teesworks site, which it believes will be negatively affected by the H2Teesside project (the **Proposed Development**).
- 3 STG's main points have already been made in its detailed Relevant Representations [[RR-003](#)], as summarised at Issue Specific Hearing 1 (**ISH1**) on 28 August 2024 by Tom Henderson, a partner at BDB Pitmans LLP representing STG. The written summary of these oral comments is available at [[REP1-049](#)].
- 4 The Applicant is currently consulting with Interested Parties on its proposed changes to the Proposed Development, including reductions in the amount of land to be acquired compulsorily. STG appreciates this effort and intends to respond to the consultation by the deadline on 7 October. STG will also address the finalised changes after they are published, but for now STG recommends the ExA accept the proposed changes. Although the Proposed Development in the form currently being consulted on represents an improvement in the view of STG, STG continues to have a number of concerns, which remain as summarised below.
- 5 Although STG supports the Proposed Development in principle and has been working with the Applicant to reach commercial agreements governing the Applicant's use of land in and around the Teesworks site, the Applicant's existing application documents lack precision and detail. STG can therefore not adequately consider the Proposed Development's potential impacts on its property and business interests at and around the Teesworks site, including at various means of access.
- 6 The Applicant has not yet adequately explained its coordination of the Proposed Development's requirements for the Teesworks site with those of other large and nationally significant infrastructure projects in the area, including Net Zero Teesside and HyGreen Energy. The Applicant has also not yet adequately explained coordination of the Proposed Development with STG's existing property and business interests in and around the Teesworks site. STG acknowledges that (in response to an ISH1 action point) the Applicant is preparing a document

for Deadline 2 to address this information gap, and STG will consider and comment further once that information is available.

- 7** In the meantime, STG's concern remains that the Proposed Development risks sterilising the Teesworks site and actively affecting ongoing and upcoming development plans. The land identified as required for the Proposed Development by the Applicant is, in the view of STG, far too large and appears to comprise land that goes far beyond what STG understands to be required for the delivery of the project. STG accordingly requires further engagement with the Applicant in order to reduce the area of land on the Teesworks site that would be affected by the DCO.
- 8** The Applicant has agreed in principle that protective provisions can be provided for STG's benefit on the face of the Order, which is welcomed. STG is currently drafting its preferred form protective provisions which will be shared with the Applicant for discussion and submitted for incorporation into the H2Teesside DCO in due course. Provision of further information about the impact on the STG site will also assist completion of the draft protective provisions.
- 9** The Applicant has to date not engaged proactively with STG in general, with the flow of information occurring sporadically and without sufficient notice in advance of examination deadlines. STG was not notified about the Applicant's proposed changes to the Proposed Development, an initial draft Statement of Common Ground was not received until just before the Applicant submitted it to the Examining Authority at Deadline 1. The Applicant only shared its promised substantive update to the Statement of Common Ground on 2 October, the day before Deadline 2. STG endeavoured to review and return its comments to the Applicant on 3 October for submission but, subject to whether the Applicant incorporates these comments in its Deadline 2 submission, STG reserves the right to comment further. No voluntary agreements have been reached on the acquisition of STG land, interests in land or easements for the Applicant's utilities corridors.
- 10** Despite the differences in the parties' positions at present, and the Applicant's lack of proactive and regular engagement to date, STG remains committed to working with the Applicant to agree matters raised in its representations before the end of examination in February 2025. STG met with the Applicant following Deadline 1, as noted above, and hopes that the Applicant's stated commitment to meet regularly and supply information is adhered to.

## H2Teesside DCO Examination

### Deadline 2: Response to Deadline 1 Submissions – South Tees Group (20049389)

The South Tees Group (**STG**)’s responses to Section 3.3 of the Applicant’s Comments on Relevant Representations and Additional Submissions [[REP1-007](#)] are set out in the table below.

<b>STG’s RR issue</b>	<b>Applicant’s comments</b>	<b>STG’s response</b>
<p>Whilst the South Tees Group has been liaising with the Applicant to reach commercial agreements for H2T’s use of land in which it has an interest, the extent of land contained in the application for each work is not defined clearly, lacking both precision and sufficient detail. For instance, it is not clear from the available plans where, within broad areas, the utilities corridors will be located, or whether the existing corridors will be shared with H2T or other projects in the same area.</p>	<p>The Applicant is going to submit a paper at Deadline 2 that explains the interactions between H2Teesside and NZT and HyGreen and how this relates to the land rights sought in the DCO.</p>	<p>STG looks forward to receiving and reviewing this paper after its publication.</p>
<p>There are also concerns with the potential impact of the proposed works on the highway network and on means of access to the Teesworks site.</p>	<p>Chapter 15 [APP-068] identifies no significant effects on any of the links assessed at the peak of construction and therefore, no significant effects during the construction phase outside of the peak of construction, operation or decommissioning phases. The assessment has been undertaken in accordance with best practice guidance, as set out in Paragraph 15.1.1 of Chapter 15 [APP-068]. The</p>	<p>STG welcomes its CTMP consultee role and requests that the Applicant be required to set up the Framework CTMP working group described in its Deadline 1 RR response [<a href="#">REP1-007</a>], with STG included as a member.</p>

<b>STG's RR issue</b>	<b>Applicant's comments</b>	<b>STG's response</b>
	<p>best practice guidance is set out in the Institute of Environmental Management and Assessment Guidelines: Environmental Assessment of Traffic and Movement.</p> <p>It is also relevant to note paragraph 6.1.4 of the Framework CTMP [APP-050] which states that given the other projects within the local area, the EPC Contractor(s) would liaise with other contractors in the local area to co-ordinate works, and associated construction traffic movements as far as practicable. A working group could be set up as required, although at this time the exact make up and timing of any meetings is unknown and will need to be reviewed and agreed as part of the Final CTMP(s) and Final CEMP(s) being approved prior to work commencing on site</p> <p>Part of this working group's remit could include agreeing a communications plan with neighbouring businesses where construction programmes (and therefore associated HGV movements) between the projects overlap.</p> <p>Further to the above, the dDCO [AS-013] includes a requirement (Requirement 18) that secures the submission and approval of a CTMP by the</p>	

<b>STG's RR issue</b>	<b>Applicant's comments</b>	<b>STG's response</b>
	<p>relevant planning authority, after consultation with National Highways, the relevant highway authority and STDC, before work commences on the relevant part of the authorised development. Paragraph (2) of Requirement 18 sets out what must be included in the CTMP. This includes details of the routes to be used for the delivery of construction materials and the routing strategy and procedures for the notification and conveyance of abnormal indivisible load, amongst other measures.</p>	
<p>The Applicant does not appear to have explained if, and how, it has coordinated its requirements with the details of the recently consented Net Zero Teesside (NZT) project, nor has it necessarily liaised sufficiently with the South Tees Group to ensure their respective proposals in the Teesworks site do not conflict. Because the Applicant has maximised its own design flexibility at the expense of precision, and has as yet not shared detailed information about the justification for the details of its H2T Project, the South Tees Group cannot determine the true impact of the Applicant's proposals on its own interests.</p>	<p>The Applicant is going to submit a paper at Deadline 2 that explains the interactions between H2Teesside and NZT and HyGreen and how this relates to the land rights sought in the DCO.</p>	<p>STG looks forward to receiving and reviewing this paper after its publication.</p>

<b>STG's RR issue</b>	<b>Applicant's comments</b>	<b>STG's response</b>
<p>The H2T proposals risk sterilising the Teesworks site and negatively impacting the South Tees Group's pre-existing and ongoing development plans, but the Applicant has not offered bespoke Protective Provisions, in contrast with the consented NZT DCO. The South Tees Group strongly believes that these protections are required for this project as well, and it intends to submit its own preferred form of protective provisions for consideration by the Applicant and the Examining Authority</p>	<p>The Applicant has confirmed to South Tees Group that the principle of including bespoke protective provisions in the dDCO for South Tees Group is agreed. It has been agreed between the parties that the solicitors acting for South Tees Group will produce a first draft of such protective provisions for review by the Applicant and its external advisors. The Applicant looks forward to receiving these in due course and is committed to engaging with South Tees Group to agree bespoke protective provisions.</p>	<p>STG is committed to engaging with the Applicant regarding bespoke protective provisions that make provisions similar to those included on the face of the Net Zero Teesside Order as made. STG's solicitors are currently drafting the preferred form of protective provisions, which will be shared with the Applicant and submitted to the ExA in due course.</p>
<p>To inform STDC's development strategy and to help ensure the comprehensive and efficient use of its land, it developed a master plan which informed the preparation of supplementary planning policy for the Teesworks site. When STDC was established, it was agreed between Tees Valley Combined Authority (which was established by STDC pursuant to its powers under the Localism Act 2011) (TVCA) and Redcar &amp; Cleveland Borough Council (RCBC) that RCBC would retain planning powers and continue to act as the local planning authority for the Teesworks site in respect of planning policy and development</p>	<p>Section 4.0 (paragraph 4.2.5) of the Applicant's Planning Statement [APP031] confirms that the policy framework for examining and determining applications for development consent, such as that for the Proposed Development, is provided by National Policy Statements ('NPSs') and that these are the primary policy used by the Secretary of State to examine and determine such applications.</p> <p>Section 4.7 (paragraph 4.7.3) acknowledges that other matters that the Secretary of State may consider important and relevant in determining applications for development consent can include local development plan policy. Local development</p>	<p>No further comments at this stage.</p>

<b>STG's RR issue</b>	<b>Applicant's comments</b>	<b>STG's response</b>
<p>management, and in the processing of planning applications. All planning applications for development proposals within the Teesworks site must therefore be determined in accordance with the adopted Redcar and Cleveland Local Plan unless material considerations indicate otherwise. The Local Plan should therefore constitute an "important and relevant consideration" for the purposes of examining and deciding the H2T DCO application under section 104 of the 2008 Act</p>	<p>plan policy, including relevant policies of the Redcar and Cleveland Local Plan (adopted May 2018) and the development principles of the South Tees Supplementary Planning Document (adopted May 2018), and the Proposed Development's compliance with those policies and development principles, is considered in detail within Table 6.5 of the Policy Assessment Tables [APP-032].</p> <p>The Applicant has therefore had regard to relevant local development plan policy notwithstanding that the NPSs, notably EN-1, are the primary policy against which to assess the Proposed Development.</p>	
<p>Chapter 4 of the Environmental Statement [APP-056] is clear that the area is covered by some works is larger than required and that the Applicant is making use of the "Rochdale Envelope" principle, whereby it requires additional flexibility for its Project to be carried forward into the post-consent implementation phase. The South Tees Group draws the Examining Authority's attention to the Planning Act 2008, Guidance on the pre-application process (DLUHC, April 2024)<sup>3</sup> (the</p>	<p>The Applicant has used the Rochdale envelope approach to determine the Order Limits as design development is currently ongoing and no ground investigation has taken place in the connection corridors. These Order Limits have recently been refined as part of the Change Notification [PDA-019] which is currently under consultation.</p>	<p>STG reiterates its assertion from paragraph 2.3.3 of its RR [RR-003] that in order for the Applicant to rely on the Rochdale Envelope principle, more justification and evidence is required. STG welcomes the submission of further information at examination and may comment further once this is produced.</p> <p>As stated in paragraph 3.6 and 3.7 of STG's RR [RR-003], the land proposed to be acquired by the Applicant are unnecessarily broad because they</p>

<b>STG's RR issue</b>	<b>Applicant's comments</b>	<b>STG's response</b>
<p>Pre-Application Guidance) which notes that use of the Rochdale Envelope is by now well-established but also states that taking this approach “will therefore increase the amount of evidence required to be submitted in support of the application.” The Applicant has not provided sufficient justification for its excessive land requirements for the Project, most notably around utilities corridors.</p>		<p>are intended to account for several routing options. This approach removes certainty from STG's development forward planning for the Teesworks site.</p> <p>STG welcomes the Applicant's proposed changes to the Order Limits and will comment on the relevant changes once they are confirmed, but for now its concerns remain about the amount of land the Applicant has proposed to acquire.</p>
<p>Additionally, the South Tees Group understands that the H2T Order Limits includes land falling outside the scope of the option agreement being negotiated for the H2T works (discussed further below), and which is understood to be proposed for HyGreen4, NZT and future projects. If the Applicant is not negotiating to acquire that additional land (which covers a significant part of the Teesworks site) for the H2T project, it should not be included within the scope of compulsory acquisition powers contained in the H2T draft DCO.</p>	<p>The Applicant is going to submit a paper at Deadline 2 that explains the interactions between H2Teesside and NZT and HyGreen and how this relates to the land rights sought in the DCO.</p>	<p>STG looks forward to receiving and reviewing this paper after its publication.</p>



<b>STG's RR issue</b>	<b>Applicant's comments</b>	<b>STG's response</b>
<p>Additionally, it appears that land in and around plots 14/10, 14/11, 14/12, 14/16, 14/17 and 14/24 as shown on sheet 14A of the Land Plans (AS-003), is already subject to permanent acquisition of rights under the NZT DCO. It also appears that many plots along the highways to the southeast of the main Teesworks site in which the South Tees Group has interests are already subject to the acquisition of rights or temporary possession under the NZT DCO. In each case, the overlap between projects is unclear and it is unclear from the Applicant's documentation how this impact on land has been minimised, and how the overlapping works will be managed to minimise disruption and sterilisation.</p>	<p>The Applicant and NZT project will have a number of import and export connections between them. These plots are required to facilitate those connections. The Applicant and NZT are in discussion with regards to appropriate Protective Provisions for these connections.</p>	<p>STG requests information on the overlap between projects in this area and how that overlap's impact on the land has been minimised.</p>
<p>The South Tees Group's view is that the Applicant is seeking permanent rights over utility corridors which are wider than reasonably required, may not align with NZT or existing on-site corridors in the same area (see Table 1 below), and are not justifiable having regard in particular to the Guidance cited above. The Applicant should only be seeking compulsory acquisition powers over the minimum amount of land required for the</p>	<p>The Applicant has used the Rochdale envelope approach to determine the Order Limits. These Order Limits have recently been refined as part of the Change Notification [PDA-019] which is currently being consulted on.</p>	<p>STG reiterates its assertion from paragraph 2.3.3 of its RR <a href="#">[RR-003]</a> that in order for the Applicant to rely on the Rochdale Envelope principle, more justification and evidence is required. STG welcomes the submission of further information at examination and may comment further once this is produced.</p> <p>As stated in paragraph 3.6 and 3.7 of STG's RR <a href="#">[RR-003]</a>, the land proposed to be acquired by the</p>

<b>STG's RR issue</b>	<b>Applicant's comments</b>	<b>STG's response</b>
<p>Project, whereas the proposed utilities corridors as shown in the current Works Plans (AS005) often cover large swathes that the Applicant justifies with the Rochdale Envelope principle. For instance, two water connection options are included within the Order Limits, and the Applicant acknowledges in paragraphs 4.3.30 and 4.3.37 of the Environmental Statement [APP-056] that they are currently shown as one "broad corridor" rather than more realistic ones, "to account for all options".</p>		<p>Applicant are unnecessarily broad because they are intended to account for several routing options. This approach removes certainty from STG's development forward planning for the Teesworks site.</p> <p>STG welcomes the Applicant's proposed changes to the Order Limits and will comment on the relevant changes once they are confirmed, but for now its concerns remain about the amount of land the Applicant has proposed to acquire.</p>
<p>Land is also proposed to be acquired for multiple energy supply connection alternatives (paragraph 4.3.25 of the Environmental Statement), pipelines for potential gas supplier connections as potential replacements for specific onsite Project features (paragraph 4.3.10) and potential alternatives for hydrogen transmission routeing and connections (paragraph 4.3.23). The entire main Teesworks site is shown on the Works Plans (AS-005) as being required for many of the utilities corridors, which does not correspond with what is reasonably required – nor with the narrower corridors in the NZT DCO</p>	<p>The Applicant has been engaging with STG's technical teams to discuss and agree suitable corridors for H2Teesside connections. These are now reflected in the Change Notification (PDA-019) that is currently under consultation. Plot 15/243 (and nearby plots) are required for raw water import connections.</p>	<p>STG welcomes the Applicant's proposed changes to the Order Limits and will comment on the relevant changes once they are confirmed, but for now its concerns remain about the amount of land the Applicant has proposed to acquire.</p>

<b>STG's RR issue</b>	<b>Applicant's comments</b>	<b>STG's response</b>
<p>The lack of detail on the precise location of final utility corridors within the DCO application and the broad acquisition and use of land in which the South Tees Group has interests hinders the South Tees Group's understanding of the Project. It may harm future development plans and it potentially prevents the full benefits of the freeport designation from being realised. The use of any utilities corridor permitted by the draft DCO must be conditional upon the potential for the service corridors to change as a result of other developments and permissions on the Teesworks site. It is therefore imperative that the Applicant rationalises the proposed utilities corridors to that which is actually required, and that it seeks to share these corridors with other end users wherever possible.</p>		
<p>The South Tees Group retain significant concerns about the extent of its land included within the Project's Order limits for utilities. It is also not clear from the application documents why plot 15/243 (and nearby plots) are included, or why they are so extensive, given South Tees Group's</p>	<p>The Applicant has been engaging with STG's technical teams to discuss and agree suitable corridors for H2Teesside connections. These are now reflected in the Change Notification (PDA-019) that is currently under consultation. Plot 15/243 (and nearby plots) are required for raw water import connections</p>	<p>STG welcomes the Applicant's proposed changes to the Order Limits and will comment on the relevant changes once they are confirmed, but its concerns remain about the amount of land the Applicant has proposed to acquire.</p>

<b>STG's RR issue</b>	<b>Applicant's comments</b>	<b>STG's response</b>
understanding of the Applicant's water pipeline requirements.		
consent mechanism for H2T to be able to exercise any works or land powers subject to their consent.	As noted above the Applicant is committed to negotiating appropriate protective provisions with STG.	STG's solicitors are currently drafting the preferred form of protective provisions, which will be shared with the Applicant and submitted to the ExA in due course.
The sensitive receptors referenced in ES Chapter 3 relate to residential properties and ecological designations. However, the existing industrial uses within the Teesworks Masterplan area have not been included, such as the Northumbrian Water Bran Sands Regional Effluent Treatment Works, whereby workers could be sensitive to air-borne pollutants or the buildings / equipment / plant could be sensitive to vibration. We request that all sensitive receptors within the Teesworks' Masterplan area be considered in the ES.	<p>Following Statutory Consultation, the Northumbrian Water Bran Sands offices were included as a receptor within the noise assessment, presented in 6.2.11 ES Vol 1, Chapter 11: Noise and Vibration [APP-063]. Northumbrian Water Bran Sands offices are included as NSR H7. Table 11-34 identified no likely significant effects for this NSR during construction, operation or decommissioning.</p> <p>Industrial use receptors are covered by Health and Safety regulations and would not normally be included in an EIA for air quality.</p>	STG's previous comment is now addressed.
It is therefore concerning that planning permission for B2/B8 uses (ref R/2020/0820/ESM) at Lackenby is excluded from consideration as a	The referenced planning consent (ref R/2020/0820/ESM) will be constructed between 2028 and 2031, with operation commencing in	STG is satisfied with the Applicant's response subject to STG undertaking a review of the updated Cumulative Assessment to be submitted

<b>STG's RR issue</b>	<b>Applicant's comments</b>	<b>STG's response</b>
<p>cumulative scheme within the Transport Assessment (TA) on the basis that the development is expected to commence in 2028 and complete in 2031. The South Tees Group therefore asserts that the construction and operational phases of this project have the potential to overlap with that of the H2Teesside scheme and therefore should have been included within the assessment.</p> <p>It has been assumed that all construction compounds to the south of the River Tees will be accessed via the A1085 Trunk Road / Teesworks Steel House Gate roundabout. Chapter 15 of the ES goes on to assess the effects of the project with other developments in the area. :</p> <p>The South Tees Group requests that thorough consultation between H2Teesside and the South Tees Group is undertaken to better understand the potential effects of all projects and what mitigation is necessary in order to reduce impacts on the local highway network, including upon the following highway links:</p> <p>link 2 – A1085 Trunk Road, 1.34 km south of West Coatham Lane;</p>	<p>2031. The planning consent does not provide construction traffic numbers generated by the site, as the operation phase is anticipated to generate significantly more traffic, and the effects during construction are assessed to be not significant. The Proposed Development application is anticipated to see construction between 2025 and 2030, with low levels of operational traffic after 2030. The operational traffic has not been assessed in terms of cumulative impact, due to low numbers. Therefore, there is therefore no crossover of the significant traffic impacts of the two planning consents. Consultation should remain ongoing, with relevant mitigation implemented where necessary during construction and operation.</p> <p>The network peak hours can be taken as being 0800 to 0900 and 1600 to 1700, and with reference to Table 15A-40 and 15A-41 of 6.2.15 ES Vol 1 Chapter 15 Traffic and Transport [APP-068], in the weekday AM peak the construction phase will add 31 vehicles to Links 2 and 4 and 4 vehicles to link 11. This is not then considered to result in a severe highway impact based on the criteria set out in that chapter. In the weekday PM peak, there will be a</p>	<p>by the Applicant by Deadline 5, including the incorporation of the effects of the British Steel Electric Arc development (ref. R/2023/0793/ESM) at Lackenby.</p>

<b>STG's RR issue</b>	<b>Applicant's comments</b>	<b>STG's response</b>
<p>link 4 – A1085 Trunk Road, 500 m north of A1053 Tees Dock Road; and</p> <p>link 11 – A1053 Greystone Road, 600m north of the A174/ A1053 Greystones roundabout</p>	<p>total of 80 trips to links 2 and 4 and 9 vehicle trips to link 11.</p> <p>The impact on links 2 and 4 have then been considered further with a capacity assessment of the A1085 Trunk Road / Teesworks Steel House Gate roundabout being included within Section 15A.7 of the Transport Assessment [APP-210] which concluded that it would continue to operate within capacity at the year of peak construction, 2026, which is before the 2028-2031 construction period assumed for R/2020/0820/ESM.</p> <p>The Applicant has submitted a Framework Construction Workers Travel Plan [APP-049] and Framework Construction Traffic Management Plan [APP-050] with the ES, both of which will be form the basis of a Final Construction Workers Travel Plan and Final Construction Traffic Management Plan to support in mitigating any Traffic and Transport effects. It is assumed that all construction compounds to the south of the River Tees will be accessed via the A1085 Trunk Road / Teesworks Steel House Gate roundabout</p>	

<b>STG's RR issue</b>	<b>Applicant's comments</b>	<b>STG's response</b>
<p>Review of the cumulative schemes listed in the TA and Chapter 23 Cumulative and Combined Effects Appendix 23A identifies planning permission reference R/2023/0793/ESM relating to the construction of an Electric Arc Furnace on behalf of British Steel has been omitted from the long list of cumulative schemes. This is particularly pertinent because the application documentation submitted with the British Steel planning application indicates that its construction programme is likely to overlap with that of H2Teesside.</p> <p>The South Tees Group requests that a detailed and up to date review of likely cumulative schemes be undertaken and that any omissions in the current long list of schemes are addressed. The South Tees Group would be pleased to assist H2Teesside to ensure that the assessment is comprehensive and accounts for all relevant projects including those planned across the Teesworks site that are the subject of planning applications or planning permissions.</p>	<p>The cut-off date for the Cumulative Assessment was 01/11/2023 (paragraph 23.3.19 in Chapter 23 Cumulative and Combined Effects [APP-076]). The planning application for R/2023/0793/ESM was submitted on 24/11/2023, after the cut-off date in the Cumulative Assessment.</p> <p>The Cumulative Assessment [APP-076] will be updated during Examination and submitted at Deadline 5, the comments from South Tees Group, and ongoing engagement with them, will be taken into consideration.</p>	<p>STG reserves the right to comment further once the updated Cumulative Assessment is made available at Deadline 5.</p>

<b>STG's RR issue</b>	<b>Applicant's comments</b>	<b>STG's response</b>
<p>Chapter 11 Noise and Vibration suggests a range of mitigation or enhancement measures may be required, including placing limits on noise emissions from plant and equipment at source secured via Requirements of the draft DCO. Review of the draft Requirements indicates that the control of noise during operation is omitted from the list of draft Requirements.</p>	<p>No operational noise Requirement is needed as the ES has concluded that no likely significant effects are expected to arise during the Operational phase, with embedded measures that will be secured through the Environmental Permit considered. As such, no additional mitigation needs to be secured via the DCO.</p>	<p>STG is satisfied with the Applicant's response and clarification.</p>
<p>We note that a Construction Environmental Management Plan (CEMP) will be prepared prior to construction and a Framework CEMP [APP-043] has been prepared as part of the Environmental Statement. The South Tees Group supports this approach and considers it important that it is centrally involved in the preparation of any CEMP and have the opportunity to input into it prior to its finalisation.</p>	<p>There is a Requirement securing the preparation and approval of a CEMP contained in the Draft DCO [AS-013].</p>	<p>STG is satisfied with this position in respect of it being consulted on the final CEMP, as set out in the relevant draft Requirement.</p>
<p>The ES states that an Effluent Treatment Plant will be constructed, which will consist of an oily water separator, neutralisation sump, storm water sump and any other suitable treatment to meet agreed discharge standards. All oily water effluents produced by the Hydrogen Production Facility will</p>	<p>Case 1B (Minimalised Liquid Waste from the ETP) is no longer proposed by the Applicant, as such Case 2B (discharge of effluent to Tees Bay via the NZT outfall) will be progressed. Therefore, effluent will be treated to an appropriate level associated with the use of Best Available Technique and</p>	<p>STG notes that the option – Minimalised Liquid Waste from the ETP – is now no longer proposed by the Applicant and that, instead, the remaining option – use of the NZT outfall – is to be utilised.</p>



<b>STG's RR issue</b>	<b>Applicant's comments</b>	<b>STG's response</b>
<p>be sent to the oily water separator. For post separation, there are currently two options considered where the liquid effluent will be sent. The first option is to send liquid effluent to Minimum Liquid Discharge Plant on the main site, that may consist of ultrafiltration and Closed-Circuit Reverse Osmosis . This plant will produce a stream of clean water that will be reused in the hydrogen production plant and a brine stream that will be tankered from site to a suitable third-party disposal site. The second option is to treat this effluent to an appropriate level associated with the use of Best Available Technique and disposed of via the NZT outfall that is to be built as part of the NZT DCO development. Any solids will be sent for disposal offsite.</p> <p>There is limited information on the potential quantity of brine steam that will be tankered offsite for disposal by a third party or the quantity of any solids that will be sent for disposal. The South Tees Group requires further detail in respect of both options in order that it can understand the potential for highways impacts associated with both options.</p>	<p>disposed of via the NZT outfall that is to be built as part of the NZT DCO development.</p>	<p>STG's previous concern is therefore now addressed.</p>

