

3 October 2024

The Planning Inspectorate
National Infrastructure
Planning
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Bristol, BS1 6PN

By email only

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Our ref:
SMD4/SMD4/SAB/0009.119
Your ref:

Dear The Planning Inspectorate

SABIC UK PETROCHEMICALS LIMITED (URN 20049383)

APPLICATION BY H2TEESSIDE LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE H2TEESSIDE PROJECT (EN070009)

DEADLINE 2 SUBMISSION

We are instructed by SABIC UK Petrochemicals Limited (**SABIC**) in relation to the above development.

1. NOTIFICATION OF WISH TO ATTEND ACCOMPANIED SITE INSPECTION (ASI)

- 1.1 SABIC confirms that it wishes its representative to attend the AIV.
- 1.2 Given the security requirements relating to SABIC's land, the Applicant is invited and urged to contact SABIC as soon as possible in order to make arrangements for the ASI.

2. NOTIFICATION OF WISH TO ATTEND COMPULSORY ACQUISITION HEARING

- 2.1 SABIC confirms its wish to attend the compulsory acquisition hearing :
- 2.2 Attendees from SABIC are expected to be:
 - 2.2.1 Stephen Dagg, Womble Bond Dickinson UK LLP (in-person)
 - 2.2.2 Simon Mann, SABIC (in-person)
 - 2.2.3 Daniella Franken, SABIC (virtually)
- 2.3 The agenda for the hearing has not yet been published, but SABIC would intend to make representations to explain its operations on Teesside and how they might be affected by the compulsory acquisition powers contained in the draft Order.

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2.4 SABIC benefits from interests in the following plots:

<p><u>Part 1- Freehold Interests</u> 3/17, 3/25, 5/67, 5/69, 5/70, 5/71, 5/72, 5/74, 5/75, 5/76, 5/77, 5/78, 5/79, 5/80, 5/81, 5/82, 5/83, 5/84, 5/85, 5/86, 5/87, 5/88, 5/89, 5/93, 5/94, 5/95, 5/96, 5/97, 5/98, 5/99, 5/100, 5/103, 5/104, 5/105, 5/107, 5/108, 6/1, 6/2, 6/3, 6/4, 6/5, 6/6, 6/7, 6/8, 6/9, 8/9, 18/10, 19/10, 19/13, 20/9, 20/10, 20/12, 20/13</p> <p><u>Part 1- Lessees or Tenants or Reputed Lessees or Tenants</u> 5/4, 5/79, 5/80, 5/81, 5/82, 5/83, 5/84, 5/85, 5/86, 5/87, 5/88, 8/7, 8/9, 8/10, 8/12, 9/19, 9/21, 9/22, 9/25, 9/31, 9/32, 9/46, 9/47, 10/3, 10/4, 10/5, 10/6, 10/9, 10/10, 10/11, 10/12, 10/13, 10/14</p> <p><u>Part 1 – Occupiers or Reputed Occupiers</u> 3/11, 3/12, 3/13, 5/4, 5/18, 5/19, 5/23, 5/32, 5/38, 5/39, 5/41, 5/42, 5/46, 5/66, 5/67, 5/69, 5/70, 5/71, 5/74, 5/75, 5/77, 5/78, 5/79, 5/80, 5/81, 5/82, 5/83, 5/84, 5/85, 5/87, 5/88, 5/89, 5/93, 5/94, 5/95, 5/96, 5/97, 5/98, 5/99, 5/100, 5/103, 5/104, 5/105, 5/107, 5/108, 6/1, 6/2, 6/3, 6/4, 6/5, 6/6, 6/7, 6/8, 6/9, 8/1, 8/2, 8/3, 8/4, 8/5, 8/6, 8/7, 8/8, 8/9, 8/10, 8/12, 9/1, 9/12, 9/18, 9/19, 9/21, 9/22, 9/25, 9/31, 9/32, 9/46, 9/47, 10/3, 10/4, 10/5, 10/6, 10/8, 10/9, 10/10, 10/11, 10/12, 10/13, 10/14, 10/17, 10/25, 10/26, 10/28, 10/30, 10/31, 10/32, 10/33, 10/34, 10/35, 10/36, 10/38, 10/39, 10/45, 11/5, 11/8, 11/10, 11/12, 11/13, 11/15, 11/16, 11/19, 11/23, 11/26, 11/27, 11/28, 11/29, 11/31, 11/40, 11/52, 11/61, 11/65, 11/68, 11/100, 11/123, 11/132, 11/133, 12/2, 12/3, 12/4, 15/70, 15/71, 15/73, 15/76, 15/78, 15/79, 15/83, 15/85, 15/86, 15/87, 15/88, 15/90, 15/91, 15/92, 15/93, 15/111, 15/112, 15/127, 15/129, 15/131, 15/135, 15/136, 15/144, 15/145, 15/148, 15/151, 15/153, 15/220, 15/221, 15/222, 15/223, 15/224, 15/226, 15/230, 15/231, 18/1, 18/5, 18/7, 18/10, 19/1, 19/2, 19/3, 19/6, 19/7, 19/8, 19/9, 19/10, 19/11, 19/12, 19/16, 19/18, 19/19, 19/23, 19/26, 19/28, 19/30, 19/32, 19/36, 20/1, 20/2, 20/4, 20/5, 20/6, 20/8, 20/9, 20/10, 20/11, 20/12, 20/13, 20/17, 20/19, 21/1, 21/3, 21/6, 21/9, 21/13</p> <p><u>Part 1- A person a) is interested in the land or b) has power to sell and convey the land or to release the land</u> 8/10, 8/11, 9/30</p> <p><u>Part 2- (a) Claimant under section 10 of the Compulsory Purchase Act 1965 (b) Claimant under Part 1 of the Land Compensation Act 1973 (c) Claimant under section 152(3) of the Planning Act 2008</u> 8/1, 8/2, 8/3, 8/4, 8/5, 8/6, 9/1, 18/5, 19/1, 19/2, 19/3, 19/6, 19/7, 19/8, 19/9, 20/2, 20/4, 20/5, 20/8, 21/1, 21/3, 21/6, 21/9, 5/46, 5/66, 10/17, 10/30, 10/31, 10/32, 10/33, 10/34, 10/35, 10/36, 19/11, 19/12, 19/16, 19/18, 19/23, 19/30, 20/19, 21/13</p> <p><u>Part 3- Persons enjoying easement or right over land</u> 3/11, 3/12, 3/13, 5/18, 5/19, 5/23, 5/33, 5/38, 5/39, 5/41, 5/42, 5/46, 5/66, 8/1, 8/2, 8/3, 8/4, 8/5, 8/6, 9/1, 9/12, 9/18, 10/17, 10/25, 10/26, 10/28, 10/30, 10/31, 10/32, 10/33, 10/34, 10/35, 10/38, 10/39, 10/45, 11/5, 11/8, 11/10, 11/12, 11/13, 11/15, 11/16, 11/19, 11/23, 11/26, 11/27, 11/28, 11/29, 11/31, 11/40, 11/52, 11/61, 11/65, 11/68, 11/100, 11/123, 11/132, 11/133, 12/2, 12/3, 12/4, 15/70, 15/71, 15/73, 15/76, 15/78, 15/79, 15/83, 15/85, 15/86, 15/87, 15/88, 15/90, 15/91, 15/92, 15/93, 15/111, 15/112, 15/127, 15/129, 15/131, 15/135, 15/136, 15/144, 15/145, 15/148, 15/151, 15/153, 15/220, 15/221, 15/222, 15/223, 15/224, 15/226, 15/230, 15/231, 18/1, 18/5, 18/7, 19/1, 19/2, 19/3, 19/6, 19/7, 19/8, 19/9, 19/11, 19/12, 19/16, 19/18, 19/19, 19/23, 19/26, 19/28, 19/30, 19/32, 19/36, 20/1, 20/2, 20/4, 20/5, 20/6, 20/8, 20/11, 20/17, 20/19, 21/1, 21/3, 21/6, 21/9, 21/13</p>

2.5 SABIC intends to refer to the following documents

- 2.5.1 Its Detailed Written Representation;
- 2.5.2 The draft Order [AS-014]
- 2.5.3 Land Plans [AS-003]

2.5.4 Book of Reference [AS-012].

2.5.5 Works Plans [AS-005].

3. REPLY TO FIRST RULE 17 LETTER

3.1 We confirm that AI has not been used in the production of SABIC's representations.

4. DETAILED WRITTEN REPRESENTATION AND SUMMARY

4.1 We enclose with this letter SABIC's Detailed Written Representation.

4.2 SABIC adopts its Relevant Representation as the required Summary of its Detailed Written Representation.

5. RESPONSE TO APPLICANT'S COMMENTS ON SABIC'S RELEVANT REPRESENTATION

5.1 We enclose with this letter SABIC's Response to the Applicant's Comments on SABIC's Relevant Representation.

Yours faithfully

Womble Bond Dickinson (UK) LLP

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