



3 October 2024

The Planning Inspectorate
National Infrastructure
Planning
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By email only

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

Dear The Planning Inspectorate

SABIC PETROCHEMICALS BV AND SABIC TEES HOLDINGS LIMITED

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

REQUEST TO ACCEPT LATE RELEVANT REPRESENTATIONS

1. INTRODUCTION

- 1.1 We are instructed by SABIC Tees Holdings Limited (**SABIC TH**) and SABIC Petrochemicals B.V. (a company registered in the Netherlands) (**SABIC NL**) in relation to the above development.
- 1.2 SABIC TH and SABIC NL are companies belonging to the same group of companies as SABIC UK Petrochemicals Limited (URN 20049383) (**SABIC UK**). SABIC UK has already made a relevant representation in respect of this Application.
- 1.3 SABIC TH is the beneficiary of rights in a number of Plots:

<p><u>Part 1 – Occupiers or Reputed Occupiers</u> 15/231, 15/232, 18/1, 18/5, 19/1, 19/2, 19/3, 19/6, 19/7, 19/8, 19/16, 19/18, 19/23, 19/30, 20/1, 20/2, 20/4, 20/5, 20/6, 20/8, 20/19, 21/1, 21/3, 21/6, 21/9, 21/13</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> 18/1, 18/5, 19/1, 19/2, 19/3, 19/6, 19/7, 19/8, 20/1, 20/2, 20/4, 20/5, 20/6, 20/8, 21/1, 21/3, 21/6, 21/9, 19/16, 19/18, 19/23, 19/30, 20/19, 21/13, 15/231, 15/232</p> <p><u>Part 3- Persons enjoying easement or right over land</u> 18/1, 18/5, 19/1, 19/2, 19/3, 19/6, 19/7, 19/8, 19/16, 19/18, 19/23, 19/30, 20/1, 20/2, 20/4, 20/5, 20/6, 20/8, 20/19, 21/1, 21/3, 21/6, 21/9, 21/13</p>

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1.4 SABIC NL is the owner of the inventory which is processed by SABIC UK's facilities and is carried in SABIC UK's pipes. SABIC UK is therefore retained by SABIC NL to manufacture products and provide storage, handling, transport and other manufacturing services. This kind of arrangement is common to large groups of companies who ship and manufacture products across international boundaries.

2. LATE RELEVANT REPRESENTATION

2.1 We therefore respectfully request that the Examining Authority accepts late Relevant Representations from both SABIC NL and SABIC TH.

3. ADOPTION OF SABIC UK'S SUBMISSIONS

3.1 If the Examining Authority accepts SABIC NL and SABIC THs' request, SABIC NL and SABIC TH adopt the following documents submitted by SABIC UK as their own:

3.1.1 The Relevant Representation [RR-035];

3.1.2 The Response to the Applicant's Comments on SABIC UK's Relevant Representation (submitted at Deadline 2); and

3.1.3 The Detailed Written Representation of SABIC UK (submitted at Deadline 2).

3.2 SABIC NL and SABIC TH would also adopt the Relevant Representation [RR-035] as its summary of its Detailed Written Representation.

4. NOTIFICATION OF WISH TO ATTEND ACCOMPANIED SITE INSPECTIN (ASI)

4.1 SABIC NL and SABIC TH confirm that they wish their representative to attend the AIV. That representative will be the same person that is representing SABIC UK.

4.2 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.

5. NOTIFICATION OF WISH TO ATTEND COMPULSORY ACQUISITION HEARING

5.1 SABIC NL confirms its wish to attend the compulsory acquisition hearing :

5.2 Attendees from SABIC NL will be the same as from SABIC UK, and are expected to be:

5.2.1 Stephen Dagg, Womble Bond Dickinson UK LLP (in-person)

5.2.2 Simon Mann, SABIC (in-person)

5.2.3 Daniella Franken, SABIC (virtually)

5.3 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.

5.4 SABIC TH benefits from interests in the following plots:

Part 1 – Occupiers or Reputed Occupiers

15/231, 15/232, 18/1, 18/5, 19/1, 19/2, 19/3, 19/6, 19/7, 19/8, 19/16, 19/18, 19/23, 19/30, 20/1, 20/2, 20/4, 20/5, 20/6, 20/8, 20/19, 21/1, 21/3, 21/6, 21/9, 21/13

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

18/1, 18/5, 19/1, 19/2, 19/3, 19/6, 19/7, 19/8, 20/1, 20/2, 20/4, 20/5, 20/6, 20/8, 21/1, 21/3, 21/6, 21/9, 19/16, 19/18, 19/23, 19/30, 20/19, 21/13, 15/231, 15/232

Part 3- Persons enjoying easement or right over land

18/1, 18/5, 19/1, 19/2, 19/3, 19/6, 19/7, 19/8, 19/16, 19/18, 19/23, 19/30, 20/1, 20/2, 20/4, 20/5, 20/6, 20/8, 20/19, 21/1, 21/3, 21/6, 21/9, 21/13

5.5 SABIC TH intends to refer to the same documents as SABIC UK:

5.5.1 Its Detailed Written Representation;

5.5.2 The draft Order [AS-014];

5.5.3 Land Plans [AS-003];

5.5.4 Book of Reference [AS-012]; and

5.5.5 Works Plans [AS-005].

Yours faithfully

Womble Bond Dickinson (UK) LLP

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