

21 October 2024

The Planning Inspectorate
National Infrastructure
Planning
Temple Quay House
2 The Square
Bristol, BS1 6PN

By email only

Email: h2teesside@planninginspectorate.gov.uk

Womble Bond Dickinson (UK) LLP

The Spark
Draymans Way
Newcastle Helix
Newcastle upon Tyne
NE4 5DE

Tel: 0345 415 0000
Fax: 0345 415 5256
DX: 61191 Newcastle upon Tyne

██████████@wbd-uk.com
Direct: +██████████

Our ref:
SMD4/SMD4/SAB/0009.118
Your ref:

Dear The Planning Inspectorate

**SABIC UK PETROCHEMICALS LIMITED (URN: 20049383)
SABIC TEES HOLDINGS LIMITED (URN: H2TS-AFP121)
SABIC PETROCHEMICALS BV**

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

DEADLINE 3 SUBMISSION

We are instructed by the above companies (**SABIC**) in relation to the above development.

This letter and the enclosed documents comprise SABIC's Deadline 3 Response.

We enclose the following documents:

1. Response to "Document Reference 8.11.6: Response to ExQ1 Compulsory Acquisition and Temporary Possession" [REP2-027]; and
2. Response to "Document Reference 8.11.9: Response to ExQ1 Draft Development Consent Order" [REP2-027].
1. **RESPONSE TO "5.12: FRAMEWORK CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (CEMP) [REP2-012]**
 - 1.1 The Applicant has amended page 67 of this document to state:

"Trenchless methods will be used for the construction of the pipeline within Cowpen Bewley Woodland Park."
 - 1.2 This would be better expressed substituting the word "must" for the word "will".
 - 1.3 Although the framework CEMP discusses the use of HDD at Greatham Creek and the Tees Crossing, there is no clear, unambiguous obligation of this type making the use of HDD at these

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locations mandatory. The Framework CEMP should be amended to include an express requirement to use trenchless methods.

2. POTENTIAL ERROR ON THE ACCESS AND RIGHTS OF WAY PLANS [APP-011]

- 2.1 Huntsman Drive in Stockton on Tees, between the A178 Seaton Carew Road and the western access gates to the SABIC's North Tees Site, is shown on the Access and Rights of Way Plans as a private road.
- 2.2 SABIC's understanding is that Huntsman Drive is highway maintainable at the public expense. This is confirmed by the National Street Gazetteer which gives the Unique Street Reference Number 38204763 and states "Maintainable at public expense, Stockton-on-Tees".

Yours faithfully

Womble Bond Dickinson (UK) LLP

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