

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

Your Ref
URN: 20049389
Our Ref
MTP/TGH/207930.0002
Date
21 October 2024

Dear Sir or Madam

EN070009: H2TEESSIDE DCO EXAMINATION DEADLINE 3 SUBMISSIONS

On behalf of our client the South Tees Group (**STG**), we enclose one document for submission at Deadline 3. The document contains STG's responses to the Applicant's relevant ExQ1 answers [[REP2-019](#)] / [[REP2-020](#)] / [[REP2-023](#)] / [[REP2-024](#)] / [[REP2-026](#)] / [[REP2-027](#)] / [[REP2-028](#)] / [[REP2-035](#)], as well as comments on several of the Applicant's other Deadline 2 submissions (and one non-submission):

- Integrated Works Plans [[REP2-003](#)];
- Draft Development Consent Order [[REP2-005](#)];
- Land Rights Tracker [[REP2-018](#)];
- Order Width Limit explanatory note [[REP2-037](#)];
- Interrelation Report [[REP2-038](#)];
- Statement of Commonality [[REP2-043](#)]; and
- Statement of Common Ground between the Applicant and STG [[REP1-023](#)].

STG notes that a Statement of Progress on SoCGs is required at Deadline 3. Disappointingly, a SoCG was not submitted at Deadline 2, despite STG returning a draft provided by the Applicant at short notice. STG will not submit its own version of the SoCG at Deadline 3 because the Applicant has agreed to upload the current version on behalf of both parties.

We confirm that STG wishes to speak at both Compulsory Acquisition Hearing 1 (**CAH1**) on Wednesday 13 November 2024; and Issue Specific Hearing 2 (**ISH2**) on Thursday 14 November 2024.

We would like to register Tom Henderson, Partner with the law firm BDB Pitmans LLP, to attend in-person and speak at both hearings on behalf of STG. Contact details are set out below. Meagan Parent, Solicitor with BDB Pitmans LLP will attend in-person with Mr Henderson. Ms Parent can be reached at [REDACTED] [@bdbpitmans.com](mailto:[REDACTED]@bdbpitmans.com) or [REDACTED].

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For the purposes of CAH1, we expect to speak about STG's land interests at agenda item 4. The land relevant to STG is comprised of all the plots that South Tees Developments Limited and Teesworks Limited have interests in or own. These plots are listed in rows 51, 52 and 58 of the Schedule of Negotiations [[APP-026](#)].

For the purposes of ISH2, we expect mainly to query and respond to submissions the Applicant makes at agenda items 3 and 4.

Yours faithfully



Tom Henderson
Partner
For and on behalf of BDB Pitmans LLP

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enc Responses to Applicant's Deadline 2 submissions and responses to Applicant's ExQ1 answers