



20 November 2024

The Planning Inspectorate
National Infrastructure
Planning
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By email only

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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 4 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 4 Response.

We enclose the following documents:

1. Written Summary of Oral Submission to CAH1; and
2. Written Summary of Oral Submission to ISH2

We also provide two further responses in respect of issues arising at the hearings as follows:

1. **RESPONSE TO "ACTION POINTS FROM ISSUE SPECIFIC HEARING 2 (ISH2) HELD ON 14 NOVEMBER 2024" [EV6-007]**

ISH2-AP3	Clarification as to the status of Huntsman Drive in regard to whether it is a public road and therefore part of the Highway network (ie responsibility of the Highways Authority) or a Private road (responsibility of the Street Authority).	As stated in SABIC's "Written Summary of Oral Submission to ISH2" at paragraph 1.4 following oral confirmation as ISH1 from a representative of Stockton Borough Council that they do not consider Huntsman Drive to be a highway maintainable at the public expense SABIC is content to let this issue lie, subject to the discovery of any further evidence in this regard.
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2. CLARIFICATION OF ARTICLE 47 IN THE DRAFT DEVELOPMENT CONSENT ORDER [AS-013]

- 2.1 In the ISH1 SABIC asked for clarification as to how the Secretary of State is to decide whether the level of security being provided under Article 47 (funding for compulsory acquisition compensation) is adequate, especially in light of its concerns about the serious consequences of an incidental suspension of an inconsistent right under Article 26. In particular, how can the ExA be satisfied that the Secretary of State will approve an adequate level of funding to cover business extinguishment in those circumstances?
- 2.2 More detail is set out in Section 2 of SABIC's "Written Summary of Oral Submission to ISH2".

Yours faithfully



Womble Bond Dickinson (UK) LLP