



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

Your Ref
URN: 20049389
Our Ref
MTP/TGH/207930.0002
Date
18 December 2024

Dear Sir or Madam

EN070009: H2TEESSIDE DCO EXAMINATION DEADLINE 5 SUBMISSIONS

On behalf of our client¹ the South Tees Group (“STG”), we enclose two documents for submission at Deadline 5:

- STG’s responses to the Examining Authority’s Second Written Questions [[PD-015](#)], as well as its reply to a site remediation point the Applicant raised at Deadline 4 [[REP4-013](#)] and the updated draft DCO [[REP4-004](#)]; and
- the form of protective provisions STG requires for inclusion in the draft DCO to address its concerns – these protective provisions were also shared with the Applicant on 13 December 2024.

Regarding the Statement of Common Ground between the parties, STG provided the Applicant with its updates on 13 December 2024 and had requested that the Applicant update its entries and submit an updated version into the Examination at Deadline 5. The Applicant has advised STG that it will be in a position to do so by Deadline 6.

Additionally, STG wishes to request that the Examining Authority allow the introduction of another company under the umbrella of the South Tees Group, known as Steel River Power Limited (“SRPL”), as its operations are integral to the Teesworks site and it is necessary for SRPL to benefit from the STG protective provisions in the DCO. More detail on the company is set out below.

SRPL is a joint venture company that was incorporated to run the Teesworks site’s private wire network. The company number of SRPL is 14753711 and its registered office is Wynyard Park House, Wynyard

¹ Effective from 2 December 2024 BDB Pitmans LLP changed its name to Broadfield Law UK LLP and will now practise as “Broadfield”.

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Avenue, Wynyard, Billingham TS22 5TB. In October 2024, SRPL acquired all of the high-voltage (“HV”) substations on the site, rights in respect of all of the wires, cables and other infrastructure, and all non-fixed HV electrical apparatus.

Finally, we confirm that STG wishes to speak at Compulsory Acquisition Hearing 2 (**CAH2**) on Monday 13 January 2025; Issue Specific Hearing 3 (**ISH3**) on Tuesday 14 January 2025; and Issue Specific Hearing 4 (**ISH4**) on Wednesday 15 January 2025.

We would like to register [REDACTED], Partner with the law firm Broadfield Law UK LLP (formerly BDB Pitmans LLP), to attend CAH2 and ISH4 on behalf of STG. Contact details are set out at the foot of this letter.

We would like to register [REDACTED], Senior Director with the planning consultancy Lichfields, to attend ISH3 on behalf of STG. He can be reached at [REDACTED] [@lichfields.uk](mailto:[REDACTED]@lichfields.uk) and [REDACTED].

For the purposes of CAH2, we expect to speak primarily 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](#)].

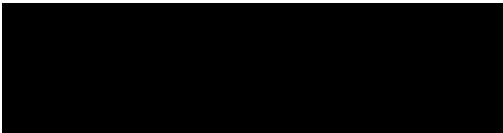
For the purposes of ISH3, we expect mainly maintain a watching brief, and to be on hand to respond to any submissions or queries relevant to STG’s interests.

For the purposes of ISH4, we expect to speak primarily about agenda items 3 and 4.



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Yours faithfully



Partner

For and on behalf of Broadfield Law UK LLP

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██████████@broadfield-law.com

enc STG responses to Applicant's Deadline 4 submissions and ExQ2
 STG preferred form of protective provisions