

**From:** [REDACTED]  
**To:** [H2Teesside](#)  
**Cc:** [REDACTED]  
**Subject:** Application by H2 Teesside Limited for an Order Granting Development Consent for the H2Teesside Project  
**Date:** 22 January 2025 17:08:11  
**Attachments:** [image001.png](#)  
[RE Application by H2 Teesside Limited for an Order Granting Development Consent for the H2Teesside Project.msg](#)  
[Application by H2 Teesside Limited for an Order Granting Development Consent for the H2Teesside Project.msg](#)  
**Importance:** High

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## For the attention of the PINS Case Manager for H2 Teesside Project

Good afternoon

Further to our emails dated 15 October and 23 December 2024 (attached for information) please find below the EDF Non Interested Party Submission in response to the Office of Nuclear Regulation (ONR) response dated 13 September 2024. EDF as a Statutory Undertaker provides significant generation and supply of electricity to the grid, and will continue to do so based on the announcement by EDF in early December 2024 that Hartlepool Nuclear Power Station was confirmed as one of four of the nuclear power stations in the fleet that will have the operational life extended. In the case of Hartlepool Power Station the extension is to at least 2027 which means the power station will continue to produce annually enough electricity to meet the needs of every home between Scarborough and Scotland. The plant plays a major role in underpinning the regional economy and with the future investment to operate out to 2027 the site can retain the highly skilled, valuable workforce while future decisions are made about new nuclear and the plant can continue to contribute to producing essential zero carbon power that the country needs.

The Hartlepool Nuclear Power station is approximately 2.9km distant from proposed hydrogen production plant and approximately 1.6km from the proposed development site pipelines as shown on DCO drawing ES Figure 4.1 entitled 'Proposed Development Site (including location of Main Site)'. EDF have held useful discussions with the applicant BP regarding the project and the supporting technical assessment work that has been undertaken and EDF have been provided with further information as to the potential hazards associated with the Operations and Safety of the proposed development covering both the production plant and supply pipelines which are the subject of the DCO application. Information to support the assessment of hazards (based on a "worst-case scenario") associated with the operations of the proposed plant and pipelines has been reviewed by EDF in conjunction with further technical explanation from BP. Having considered the information and supporting explanations provided by BP, it is the view of EDF that the proposed development is unlikely to pose an external hazard to Hartlepool Power Station during construction or operation. Furthermore, it is understood that the site will be classed as a Top Tier COMAH site and that a COMAH Licence for the facility will be obtained. The COMAH process will secure hazard prevention and emergency planning procedures. During any site licensing phase, external hazards would be examined in considerably more detail, and appropriate arrangements and safety justifications developed to take account of any potential threats. Notwithstanding the above comments, it is drawn to BP's attention that Hartlepool Nuclear Power Station is subject to a Detailed Emergency Planning Zone which was reevaluated by Hartlepool Borough Council in March 2020. During the re-evaluation the DEPZ was extended to 2km.

We trust our response is helpful and if you have any questions please do not hesitate to contact me.

Regards

[REDACTED]

[REDACTED] **on Behalf of EDF Energy Nuclear Generation Limited**  
**Planning and Development Lead**  
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