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Date: 9 May 2019

Dear Sirs

**The South Tees Development Corporation (Land at the Former Redcar Steel Works, Redcar)
Compulsory Purchase Order 2019 (the "Order")**

We are instructed by British Steel Limited (the "Client") to advise in connection with the Order. South Tees Development Corporation ("STDC") made the Order on 4 April 2019 and intend to submit to the Secretary of State for Housing, Communities and Local Government for confirmation under Section 207 of the Localism Act 2011 and the Acquisition of Land Act 1981. On behalf of our Client, we are writing to formally object to the Order.

The majority of our client's main proprietary interest in the area (the Lackenby Works, also known as the Teeside Beam Mill (title number CE225745 ("Lackenby"))) is not the subject of the Order. However, a small portion of the site is included within the CPO (Plot 63) and our client is an occupier of assets located within Plot 64. In addition, land to the east of Lackenby (Plot 51) is included within the Order and this raises questions over the road and rail access for Lackenby, in particular the main gate access, access to the main line rail connection, continuation of rail operations carried out on the rail grids north of Lackenby. Utilities that serve Lackenby are located on Plots that are the subject of the Order.

Our client's grounds for objecting to the Order are that the acquisition of the Plots around Lackenby (in particular Plots 63, 64 and 51) could have a serious adverse impact on the continued operation of Lackenby. Lackenby employs over 400 people and enjoys a global reputation for manufacturing excellence, having recently marked its 60th year of operation. Lackenby supplied steel into Heathrow Terminal 5 and hopes to be a key supplier to the airport's latest expansion plans. Lackenby is also well-positioned to play a significant role in the construction of HS2 and Hinkley Point C nuclear power station. Our client continues to recruit and train skilled employees and invest significantly in the plant and the South Tees region. Our Client's aims and aspirations for Lackenby are therefore closely aligned with STDC's function; namely to promote the economic growth and commercial development of the Tees Valley by converting assets into opportunities for business investment and economic growth. However, if the Order is confirmed without the necessary protection for our Client in respect of rail and road access to its land holdings and other operational sites and assets and the secure and continued provision of services, it will have a serious, adverse impact on the continued operation of Lackenby. This would be contrary to STDC's primary focus which, as set out in the Statement of Reasons, is to "contribute to the physical regeneration and environmental regeneration of its area by bringing back into use the Order Land".



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Our client has identified that some of the ownership boundaries on the CPO plans do not match the Land Registry title plans. In addition it is not clear whether the land, owner by our Client, between the hot metal track and the A66 is included in the Order or whether a triangle of land at southern tip of Lackenby, also owned by our Client, which houses Lackenby's natural gas connection is included within the Order. Our Client's interests are not included in the Schedule to the Order in respect of these areas. We request a meeting with STDC to discuss the various discrepancies to get clarity on the full extent of the impact of the Order on our Client's land holdings, assets and rights.

Our Client maintains that the Order should not be confirmed until the concerns and grounds of objection which it raises have been satisfactorily addressed.

We would be grateful if you would acknowledge safe receipt of this letter. Furthermore, we would ask that the objection be considered at any Public Inquiry held to assess the merits of the proposed Order. We reserve our Client's right to add or amend these grounds of objection, in particular in light of the potential boundary discrepancies.

Should you require any further information or clarification of the issues raised, please contact Victoria Du Croz of this office.

Yours faithfully



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