



Secretary of State for Housing Communities and
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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 Redcar Bulk Terminal 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.

Our client's main proprietary interest in the area (the Redcar Bulk Terminal (title number CE210322 ("RBT"))) is not the subject of the Order. However, the road and rail access for RBT (more specifically the north and south access roads including Red Main, Blue Main and Blue 12, rail access and rail infrastructure to and from the main rail network to RBT's on site rail freight handling facilities) is on land that is the subject of the Order, namely Plot 1. In addition our client has various assets, connected with the RBT operations that are located on Plot 1 (such as an electricity supply point to the RBT Garage, the Coke Crush (C1) substation electrical supply point for RBT, a number of conveyor ends and the car parking to the south of T4 Workshop). Our client will need to continue to operate and have access to, these assets. Finally utilities that serve RBT cross various Plots (primarily Plot 1), and continued supply of those services to RBT will need to be secured.

As identified in the Schedule to the Order, our client also has additional rights over Plots 5, 6, 7, 23, 27, 63, 64, 71, 75, 79, 80, 83, 95, 96, 100, 101, 104, 105, 108, 115, 117, 118, 120, 123, 124, 125, 126, 127, 130, 131, 133. Again, these rights are required for the continued operation of RBT.

Our client's grounds for objecting to the Order are that the acquisition of the Plots around the RBT (Plot 1 in particular) could have a serious adverse impact on the continued operation of RBT. As identified in their masterplan, prepared by Lambert Smith Hampton, and previously shared with STDC, since the closure of the SSI steelworks in 2015, our Client has refocused its business at RBT, reskilled the workforce and invested in the infrastructure to meet the requirements of alternative business streams. This investment is yielding returns with new contracts being secured and revenue is growing year on year. Our Client's aims and aspirations for RBT are 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 RBT. 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".

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.

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

Yours faithfully

Forsters LLP

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