

23 May 2019

Hefin Jones,
Case Manager,
National Infrastructure Planning
Temple Quay House,
2 The Square,
Bristol,
BSI 6PN

Via E-Mail: SouthamptontoLondonPipeline@planninginspectorate.gov.uk

Dear Mr Jones,

## Section 55 (Acceptance of Applications) of the Planning Act 2008 (as amended by the Localism Act 2011) Consultation

Thank you for your e-mail, dated 14 May 2019, regarding the application by Esso Petroleum Company Limited for an Order Granting Development Consent for the Southampton to London Pipeline Project.

## **Statutory Consultation**

The SDNPA can confirm that it was consulted as follows:

- On 6 September 2019 under s42 (duty to consult) of the Planning Act 2008 the SDNPA responded on 18 October 2019;
- On 9 July 2018 under s47 (duty to consult the local community) the SDNPA responded on 30 July 2018; and
- As part of a series of meeting held under the framework of a Planning Performance Agreement which was signed by the SDNPA and ESSO in February 2019.

The SDNPA have no reason to consider that the proposed works have not been publicised in accordance with the expectations of the provisions of s48 of the Planning Act 2008

## Meaningful Consultation

Whilst the SDNPA have engaged with Esso through the above consultations there is a disconnect between the baseline evidence the SDNPA is providing and the willingness of Esso to meaningfully act upon the evidence provided. The SDNPA communicated these concerns to Esso on 9 May as attached. Key matters include:

- The submission of the DCO application prematurely in advance of the conclusion of a series of meetings envisaged by the Planning Performance Agreement;
- Fixing the preferred corridor and order limits prematurely has restricted the
  applications ability to both tackle the issues raised in the PINS scoping report and
  mitigate the impacts the SDNPA have identified the proposal would have upon the
  National Park;

- Alternatives to the route 're-entering' the National Park near Alton not being fully tested stymying the ability to take an informed assessment of the proposed route and alternatives; and
- Issues regarding the temporary and longer term impact on ancient woodland (including sites below 2ha), ancient hedgerows, historic parkscapes, and the landscape, visual and archaeological impact of siting of compounds not being satisfactorily resolved.

Given the scope of evidence that will inform the Examination Hearings it is requested that the appointment of the Examination Panel takes into account the necessity for protected landscapes expertise to ensure that informed conclusions are reached.

We trust that the above information will assist you in determining whether that proposal is able to be accepted as a valid application.

Yours Sincerely,

David Cranmer BSc (Hons) MSc MRTPI Development Management Lead

> South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH

> > T: 01730 814810 E: info@southdowns.gov.uk www.southdowns.gov.uk

> > > Chief Executive: Trevor Beattie

