

9 May 2019

Mr T Sunderland
SLP Project
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Dear Tim, Phillippa and Andy

Re: Pipeline and impacts on SDNP

It was useful to meet on 1st May and discuss the current state of the scheme. I thought it might be worth setting out briefly my understanding of where we are.

You indicated to us that you plan to submit the DCO application to PINS on 15th May. Whilst I understand that without receiving development consent you cannot move to a more detailed design, the SDNPA feels that to submit now, whilst so many issues with respect to the National Park are unresolved, carries some reputational and financial risk for Esso. Fixing the preferred corridor and order limits will restrict the ability to mitigate the currently identified impacts on the National Park and tackle all the issues raised in the PINS scoping report.

The national policy context has changed radically since the original pipeline was built, with the inclusion of areas as National Park not included within the previous AONB, and now the Defra 25year strategy with its commitments to Natural Capital accounting and Net Environmental Gain from development.

With regard to the rejection of originally proposed 'northern' section around Alton, our view is that - in the absence of robust and comparative evidence regarding the merits of the alternatives inside and outside the Protected Landscape - the Secretary of State could not be satisfied that the Major Development Test, as recently played out at Arundel with respect to the alternative routes for the A27, has been properly applied. At present, we remain unconvinced that the grounds advanced for excluding the Alton option, which would have removed, at a stroke, all the impacts on the northern part of the National Park, meet this test. In the context of a 97km scheme - much of which further north will pass through very congested areas - the minor additional length, associated costs and technical issues associated with the Alton route appear to merit further consideration.

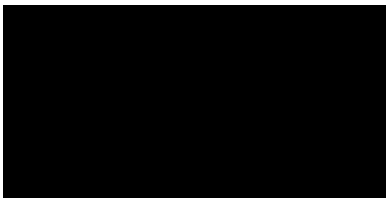
Turning to the corridor as proposed, although there has been discussion between us on matters related to the two sections currently proposed to go through the National Park, the fact the PPA was only signed in February is an indicator that the collaboration between us has not reached its natural conclusion. For example, 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 have not been satisfactorily resolved.

Your proposal to set up an “Environmental Investment Programme” targeted on the broad corridor impacted by the scheme is welcome, but unless this forms part of the submission of course any discussion must be kept separate from assessment of the net residual impact of the pipeline upon the National Park.

In conclusion and for all the above reasons, the SDNPA would still urge that you consider delaying your submission. Whilst we did agree last Wednesday that it would be sensible to extend or replace the PPA, and continue to work on a Statement of Common Ground After submission, future collaborative working will be constrained by the artificial parameters imposed by the inflexibility of the order limits.

Yours sincerely



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