



Hefin Jones
Major Applications and Plans Directorate,
Temple Quay House,
Temple Quay,
Bristol.
BS1 6PN

21 June 2019

Dear Mr Jones,

Esso Petroleum Company, Limited (the Applicant). Southampton to London Pipeline Planning Inspectorate Reference Number: EN070005 Applicant's Response to S51 Advice (Planning Act 2008)

Thank you for the Section 51 advice that was issued by the Planning Inspectorate on 11 June 2019. This letter represents the Applicant's formal response.

You identified six items that should be addressed prior to the start of the relevant representations beginning. We have considered your advice and our approach to these (numbered as they are in the Section 51 advice) is set out below.

1. Consultees

In your advice you note that we do not appear to have consulted Dorset County Council. I confirm that we did consult Dorset County Council (now Dorset Council) however this was not detailed in the Consultation Report. We have therefore amended the Consultation Report to make this clear. This change is to paragraph 5.8.7 of the report, and the illustration on page 125.

Furthermore, you identified several potentially relevant "prescribed bodies" who did not appear to have been consulted at the pre-application stage and recommend that we serve notice on them at the start of the relevant representations period. The table below sets out the Applicant's position in respect of each of these bodies.

Body	Comment
NHS Hounslow Clinical Commissioning Group.	The Applicant did consult this body but omitted to name them in Appendix 5.2 of the Consultation Report. We have amended this document.
NHS North East Hampshire and Farnham Clinical Commissioning Group.	The Applicant did consult this body but omitted to name them in Appendix 5.2 of the Consultation Report. We have amended this document.

NHS North Hampshire Clinical Commissioning Group.	The Applicant did consult this body but omitted to name them in Appendix 5.2 of the Consultation Report. We have amended this document.
NHS West Hampshire Clinical Commissioning Group.	The Applicant did consult this body but omitted to name them in Appendix 5.2 of the Consultation Report. We have amended this document.
NHS North West Hampshire Clinical Commissioning Group.	The Applicant does not believe that an organisation with this name exists and therefore we consider no further action is necessary.
NHS Surrey Heath Clinical Commissioning Group.	The Applicant did consult this body but omitted to name them in Appendix 5.2 of the Consultation Report. We have amended this document.
Metropolitan Police.	The Applicant consulted the Metropolitan Police Commissioner, who we identified as the Mayor of London, but omitted to identify this in Appendix 5.2 of the Consultation Report. We have amended this document. We understand that your intention was to refer to the Mayor's Office for Policing and Crime, and hence are making no changes to our approach at the relevant representations period.
Eclipse Power Network Limited.	The Applicant did not consult this body. They will be notified at the start of the relevant representations period.
Harlaxton Gas Networks Limited.	The Applicant did not consult this body, although we did consult Harlaxton Energy Networks and the contact is the same person at the same address. They will be notified at the start of the relevant representations period.
Murphy Gas Networks Limited.	The Applicant did not consult this body, although we did consult Murphy Power Networks and the contact is the same person at the same address. They will be notified at the start of the relevant representations period.
Southern Electric Power Distribution Plc.	The Applicant did consult this body and did include them in Appendix 5.2 of the Consultation Report. No change made.

As outlined in the table above the Applicant amended Appendix 5.2 of the Consultation Report. Whilst doing this we have also removed entries relating to prescribed bodies who are no longer listed in the revised Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 such as 'the relevant Regional Planning Body', 'the Commission for Architecture and the Built Environment', 'the Equality and Human Rights Commission' etc.

2. Book of Reference, Land Plans and Work Plans

The S51 advice asks that we carry out a full check of the Book of Reference and Land Plans to ensure all information provided is clear and consistent.

Book of Reference. The Applicant has completed a review of every Description of Land in Parts 1-5 of the Book of Reference (BoR) against the relevant Plot on the Land Plan. Where an erroneous or misleading Description of Land or typographical error was identified these were corrected. Where we considered that a change or addition to the Description of Land would further assist the reader to identify its location this opportunity has been taken to edit the Description of Land. Selection of reference points and directional indicators requires professional judgment and whilst we accept that alternative methodologies could be adopted, we are confident that a robust and uniform approach has been adopted across the Book of Reference and the Land Plans.

Land Plans. Responding to some of your specific points, the Applicant has checked the Land Plans and have found no issues with duplicate plots, or plots missing on sheets. It is possible your concerns arise from the methodology used to create the Land Plans.

- On occasion a plot on a single land holding is so extensive it will often have the same label repeated a number of times across the Land Plan and in some cases the plot could even extend across several Land Plans. This does not indicate there is more than one plot but assists the reader understanding the full extent of a plot.
- Where a Land Plan sheet at the full 1:2500 scale has an Inset Plan sheet of 1:1250, the plot is only shown labelled on the 1:1250 sheet to avoid overcrowding of labels on the full 1:2500 scale sheet. As the plot is technically on the 1:2500 land plan (albeit not with a plot label) and shown fully on the 1:1250 plan, the relevant page of the BoR lists the plot on both Land Plan Sheets.

The Applicant has identified Land Plans for which the North indication has not translated into the PDF format, this has been corrected on two Land Plan sheets 47 & 122. As a result of the checking activity an error was noted with a single plot label on Land Plan sheet 13. The Applicant identified that plot label 380 was missing a suffix 'A', this has been corrected.

With regard to the Works Plans, The Applicant has identified that on sheets 36 and 109, a label has been omitted from a plot, this has been corrected. The land is intended for use as a temporary car park as per the general works set out in Schedule 1 to the DCO.

3. Special Category Land Plan

We have noted that sheet 11 of the Special Category Land Plans was corrupted during the process of conversion of the file to a PDF. We have now provided a version without this error.

4. Design Options

We understand your comments regarding the two options contained in the application, an issue we recognised within the application covering letter. As you will appreciate, the optionality is necessary at this stage as one of the options is through National Trust land and we do not wish to commit to this option until we are assured we can obtain the necessary land rights voluntarily. That has had our focus for some considerable time and remains a priority. The options are referred to throughout the DCO where necessary as "A2a" and

“A2b” in order to distinguish where specific provisions within the DCO are only applicable to one or other of the options and we explain this approach in paragraph 7.2 of the Explanatory Memorandum. We took the view that we did not want to expressly refer to the two options within Works 1A as we have no intention of bringing both options to Examination and we did not want to potentially confuse readers of the DCO. We consider that the position is adequately described within the covering letter, the DCO and the Explanatory Memorandum and we confirm that only one option will be taken into Examination.

6 Navigation Document

You have requested that we consider whether the Navigation document should be expanded to assist in the understanding of the content of each document. Specific reference is made to lists of all appendices, tables, figures and annexes. We recognise that the navigation document can be improved by adding in more detail on a number of documents and have done so. We have also added in a new summary table of Application documents that includes version information, the Planning Inspectorate’s own references from the recently published Examination Library together with hyperlinks. This follows a form similar to the Richborough Grid Connection Guide Navigation document (which we appreciate is considered good practice).

7 The Existing Pipeline

You asked for a plan or plans at an appropriate scale showing the location of the existing pipeline in relation to the proposed development. The Applicant has provided drawings at 1:10000 to show the route of the existing line in relation to the proposed development.

The Applicant will respond separately regarding the three less urgent items that you have identified as requiring action at least 10 days before the Preliminary Meeting.

Documents accompanying this letter.

As will be apparent from the above, we are submitting a number of documents with this letter. They are on the enclosed memory stick and we list the contents below.

- Version 2 of application document 5.1 Consultation Report
- Version 2 of application document 5.1 Appendix 5 Preferred Route Consultation
- Version 2 of application document 4.3 Book of Reference
- Version 2 of application document 2.1 Land Plans
- Version 2 of application document 2.2 Works Plans
- Version 1 of application document 2.3 Special Category Land Plans
- Version 2 of application document 1.5 Navigation Document
- Version 2 of application document 4.1 Statement of Reasons
- Version 1 of a set of plans showing the existing pipeline at 1:10000

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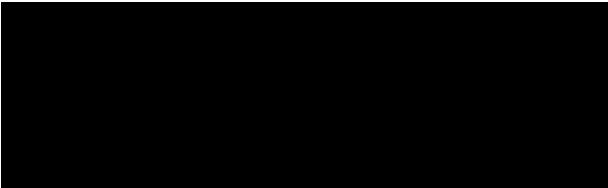
Southampton to London
Pipeline Project

Relevant Representations Period

The relevant representations period will begin on 26 June 2019 and end on 27 July 2019.

Should you have any queries, please do not hesitate to contact me.

Yours sincerely,



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