



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

29 July 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. On 21 June 2019 the Applicant responded to the items that were identified as requiring a response prior to the commencement of the relevant representations period. This letter represents the Applicant's formal response to the three remaining items.

## **5. Clarity of HRA Documents**

The Section 51 advice says the following

*"The Applicant is advised to review the documents submitted in relation to the HRA as there appears to be some duplication. Document 1.4 (Acceptance Application Index) lists two HRA documents: 1 of 2 and 2 of 2. They are listed as Document 6.5 as part of the Environmental Statement folder although not as an Appendix. Although not listed in Document 1.4 three other HRA documents have been provided: Appendix F, Appendix G including Conceptual Site Model and a document listed as HRA incl. A, B1, D, E which appears to be the same as 1 of 2."*

The Applicant has undertaken a review and does not believe that there is any duplication..

The electronic index of the the application lists two documents forming the HRA submission. Together these documents contain the full submission for the application including the assessment matrices.

The HRA was placed in the same folder as the ES because Appendix 1 of Advice Note 6 shows the ES and the HRA as being filed together.

Advice Note 10 states at para 4.30:

*“Templates for the matrices are provided at [Appendix 1](#) (HRA Stage 1: **Screening Matrices**) and [Appendix 2](#) (HRA Stage 2: **Integrity Matrices**). As relevant, matrices should be appended to or included within the Applicant’s NSER (screening matrices) or HRA Report (both matrices) but do not replace the Applicant’s NSER or HRA Report. **Matrices must be submitted in both Microsoft Word and PDF format to allow for editing during the examination as explained above, and for publication of the matrices as submitted.**”*

To address the advice note the Applicant has provided on the memory stick submitted for the application, a Word version of the whole HRA. This was in a separate folder on the memory stick labelled “Volume 8 - For Planning Inspectorate Only (selected native files).” The Applicant accepts that it would have been helpful if we had explained this in the cover letter. The split of this Word document was different to the PDF which is what may have led to the confusion. Taken together both the pdf and word HRA are in fact identical.

To simplify this and avoid confusion the Applicant has attached a Word version of just appendix D, the assessment matrices, so that you can use this and disregard the original Word version of the entire HRA.

## **8 Other Reports**

In the Section 51 advice the Scoping Report, Scoping Opinion and Preliminary Environmental Information Report were also requested. These are attached to this letter for completeness.

## **9 Flood Risk Assessment (FRA)**

A request was made for evidence of the agreement that is referred to in Section 2.7 of the FRA, Consideration of Climate Change, of the Flood Risk Assessment to the effect that the Environment Agency (EA) have agreed with the Applicant that climate change allowances do not need to be factored into the assessment for fluvial and pluvial (surface water) flood sources. This agreement was made in a meeting and hence there is no written correspondence to confirm this. The Applicant would look to address this in a Statement of Common Ground with the Environment Agency.

### **Documents accompanying this letter.**

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

- A Word version of Appendix D (Assessment matrices) of the HRA
- A copy of the Scoping Report
- A copy of the Scoping Opinion
- A copy of the Preliminary Environmental Information Report.

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

Yours sincerely,

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