

BY EMAIL ONLY

SouthamptontoLondonPipeline@planninginspectorate.gov.uk

**CMS Cameron McKenna Nabarro
Olswang LLP**Cannon Place
78 Cannon Street
London EC4N 6AF

DX 135316 London Cannon Place

T +44 20 7367 3000

F +44 20 7367 2000

cms.law

E robert.garden@cms-cmno.com

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Our ref ROGN/129163.01172

Dear Sir or Madam

Southampton to London Pipeline Project (the Project)
Esso Petroleum Company Limited (the Promoter)
The Southampton to London Pipeline Development Consent Order 202[] (the DCO)
Relevant Representation – Southern Electric Power Distribution PLC (SEPD)

SEPD is a licensed electricity distribution network operator under the Electricity Act 1989, with a statutory responsibility to operate and maintain the electricity distribution network in Central Southern England. SEPD is part of Scottish and Southern Electricity Networks, which also operates the electricity distribution network in northern Scotland.

SEPD's electricity distribution network distribute electricity from the high voltage transmission grid to industrial, commercial and domestic users, and SEPD is a statutory undertaker for the purposes of the Planning Act 2008.

SEPD's primary duties are to operate, maintain and develop its electricity distribution network in an economic, efficient and coordinated way. As such, SEPD must ensure the integrity of its electricity distribution network and must ensure that its network can operate safely and reliably. SEPD's electricity distribution network, and the supply of electricity to millions of homes, cannot be adversely affected by the Project.

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SEPD is making a relevant representation in respect of the application for the Project in order to protect its position because of its infrastructure and land interests which are located within or near to the order limits and which form part of it. SEPD's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or near to the order limits should always be maintained and access to inspect such apparatus must not be restricted.

At this stage, SEPD:

1. objects to the compulsory acquisition of land and rights over land which SEPD owns or has an interest in;
2. is not satisfied that the tests under section 127 of the PA 2008 can be met as SEPD is not satisfied that:
 - a. its land can be purchased and not replaced, or that any rights over its land can be acquired, without serious detriment to the carrying on of SEPD's undertaking;
 - b. (where its land is to be purchased) it can be replaced by other land belonging to, or available for acquisition by, the Promoter without serious detriment to the carrying on of SEPD's undertaking; or
 - c. (where rights over its land are to be acquired) any detriment to the carrying on of SEPD's undertaking, in consequence of the acquisition of the right, can be made good by the Promoter by the use of other land belonging to or available for acquisition by them; and
3. objects to the inclusion of Article 33 of the DCO insofar as it relates to SEPD's apparatus.

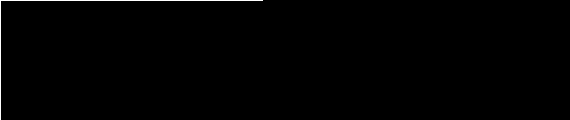
SEPD's primary concern is to meet its statutory obligations and ensure that the Project does not impact in any adverse way upon its electricity distribution network or those statutory obligations. As such, SEPD requires adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are protected and to include compliance with relevant safety standards. In the absence of appropriate protective provisions,

To that end, SEPD provided the Promoter with its standard form protective provisions on 27 February 2019. SEPD's standard form of protective provisions were not included within the draft DCO (the dDCO) submitted with the Application and, to date, SEPD has received no comments back regarding its protective provisions. SEPD has not been provided with a justification for the failure to include its protective provisions within the dDCO. The dDCO does not currently contain a form of protective provisions for the protection of SEPD's apparatus and land interests that are to SEPD's satisfaction.

SEPD encourages engagement by the Promoter at the earliest opportunity and SEPD will continue to work with the Promoter to reach satisfactory agreement with it. SEPD would hope that its protective provisions will be agreed before the preliminary meeting.

SEPD reserves the right to make further representations as part of the examination process and to attend any relevant hearings.

Yours sincerely

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CMS Cameron McKenna Nabarro Olswang LLP