

# Southampton to London Pipeline Project

## Deadline 6

Cover Letter - Response of Applicant to Deadline 6  
Application Document: 8.79

Planning Inspectorate Reference Number: EN070005

Revision No. 1.0

March 2020





The Planning Inspectorate,  
Temple Quay House,  
Temple Quay,  
Bristol.  
BS1 6PN

For the attention of:  
Hefin Jones

05 March 2020

Dear Sir or Madam,

**Planning Act 2008. Application by Esso Petroleum Company, Limited for  
Southampton to London Pipeline  
Response of Applicant to Deadline 6**

Please find enclosed our submissions for Deadline 6 as set out in the Rule 8 letter.

**1. Written summaries of oral submissions put at the Hearings held  
during the week commencing Monday 24 February 2020**

The Applicant encloses summaries of the case put at the Compulsory Acquisition Hearing on 24 February 2020 (CAH2), the Issue Specific Hearing into the draft DCO on 25 February 2020 (ISH4), and the Issue Specific Hearing into Environmental Matters on 26 February 2020 (ISH5). We also include our response to the Action Points issued after each Hearing.

The response to Action Point 13 from the Compulsory Acquisition Hearing includes updated documents in respect of the submissions referred to as Request B in the Rule 17 letter from the Examining Authority dated 13 February 2020. In summary these documents include all the landowner consents required.

**2. An updated Guide to the Application**

An updated Guide to the Application is provided. The Applicant refers to this as the navigation document.

**3. An updated version of the dDCO in clean, tracked and word versions**

An updated version of the draft DCO and the Explanatory Memorandum is provided in clean, tracked and Word versions. A note explaining the changes at Deadline 6 is also provided.

Please note that an extra Article has now been inserted into the DCO (Article 9). This means that cross-references will need to be checked and updated across the

full suite of certified documents. The Applicant will undertake this exercise prior to Deadline 7.

#### 4. An updated Compulsory Acquisition Schedule

An updated Compulsory Acquisition Schedule is provided. The Applicant has undertaken a thorough review of the landowner entries in the schedule and these have been updated with details of associated leaseholders and occupiers where those had previously been omitted. The Protective Provisions Schedule has also been updated.

#### 5. Comments on responses submitted for Deadline 5

The Applicant encloses comments on responses submitted for Deadline 5.

#### 6. Finalised Statements of Common Ground

The Applicant notes that Annex A of the Rule 8 letter calls for Finalised Statements of Common Ground (SoCG) to be submitted at Deadline 6 and Annex B also refers to “Final signed versions” to be submitted by this deadline. The Applicant also noted the comments of the Examining Authority on the importance of completing Statements of Common Ground at the recent hearings and including the documentation of matters which are still under negotiation or are not agreed. The Applicant has been working closely with the other parties to achieve this and is able to enclose a number of signed documents. In some cases, such as the Environment Agency, these replace earlier signed submissions.

In some cases it has not been possible to get an agreement signed by both parties by Deadline 6. We set out in the table below the SoCG that have been requested by the ExA in the Rule 8 letter but which the Applicant is unable to submit a version signed by both parties and the reason why this is not possible.

Other Party	Reason for Non-submission.
Hampshire and Isle of Wight Wildlife Trust	In an email of 7 October 2019, the trust advised that their Executive Committee had discussed the document and stated <i>“I am afraid the position is that we are not comfortable signing the Statement of Common Ground because of how it may be construed e.g. from a climate emergency point of view. This was not taken lightly and was in the full knowledge of the direct ask from PINS and the position of Surrey WT who say they are happy to sign their SOCG. Also, it is not a reflection on the positive engagement we have had with the project team regarding the site we manage at Bourley &amp; Long Valley.”</i> The draft SoCG submitted at Deadline 2 (REP2-013) remains the Applicants understanding of the agreed position.



<p>Southern Gas Networks (SGN)</p>	<p>The Applicant submitted a Draft Statement of Common Ground to the examination at Deadline 2 (REP2-020). On 6 February 2020 we issued an updated version. In an email of 13 February 2020 SGN stated, <i>“to complete the SOCG is an administrative burden for SGN, in particular, and the resulting document would be of no benefit to the ExA, who only need to know that engagement is ongoing between the parties.”</i> The Applicant has not been able to persuade them otherwise. Also, on 21 February 2020 legal representatives of SGN made a late submission to the examination (AS-080) The Applicant therefore submits at Deadline 6 the version that was sent to SGN on 6 February 2020.</p>
<p>Runnymede Borough Council</p>	<p>The Applicant understands that Runnymede Borough Council are unable to sign the latest draft of the SoCG and will submit a letter to the Examination at Deadline 6 to explain their reasons. It is understood that they have no objections to the latest draft which the Applicant has signed and is attached.</p>
<p>Surrey Heath Borough Council</p>	<p>There have been productive discussions with Surrey Heath Borough Council. An unsigned version of the SoCG was submitted at Deadline 5 (REP5-020). By way of an email dated 12 February 2020 the Council stated that they <i>“have read through the updated draft and confirm that we agree that this clearly and accurately reflects our current shared position”</i>. The Applicant is submitting at Deadline 6 an updated version that it has signed. The Applicant understands that the Council will be writing to the Inspectorate about reasons why it has not been possible to complete matters in time for this deadline.</p>
<p>Health and Safety Executive</p>	<p>As was discussed at the Preliminary Meeting the Health and Safety Executive has indicated that it would not engage in the Examination and will not sign a SoCG with the Applicant (AS-066). In the Rule 8 letter the ExA made a procedural decision for the Applicant to submit a draft SoCG with the HSE into the Examination. This was done at Deadline 2 (REP2-037).</p>

We also enclose an updated Statement of Commonality of Statements of Common Ground.

## 7. Outline Management Plans and Site Specific Plans

The Applicant submitted a suite of outline plans at Deadline 4. The Applicant has noted the comments made by Interested Parties at Deadline 5 and is now submitting updated plans at Deadline 6 to address comments that were made. In order to allow all parties to easily identify the changes made we have supplied two versions of these documents, one clean and one showing track changes.

The Applicant also submitted a number of Site Specific Plans at Deadline 4, and added one more at Deadline 5. The Applicant has noted the comments made by Interested Parties at Deadline 5 and is now submitting updated plans at Deadline 6 to address comments that were made. In order to allow all parties to easily identify the changes made we have again supplied two versions of these documents, one clean and one showing track changes.

We are also submitting updated Sample Vegetation Retention and Removal Plans.

## 8. Other Documents

In order to address issues arising out of the Examination the Applicant is also providing the following additional documents at this deadline and which are now referred to in the DCO requirements and to be certified by the Secretary of State.

- Schedule of Vegetation Retention Commitments in South Downs National Park
- Schedule of Habitats Regulation Assessment Commitments

I attach below a schedule of the documents submitted at Deadline 6. Should you have any queries on any aspect of this letter, please do not hesitate to contact me.

Yours faithfully,

[REDACTED]

**Ian Fletcher BSc (Hons) Dip TP MRTPI**  
**DCO Lead**  
**SLP Project team**  
**Website: [www.slpproject.co.uk](http://www.slpproject.co.uk)**

## Schedule of Documents submitted at Deadline 6

Doc No.	Rev No	Document Title
8.79	1.0	Cover letter – Response of Applicant to Deadline 6
8.80	1.0	Written Summary of Oral Submissions at Compulsory Acquisition Hearing on 24 February 2020 (CAH2)
8.81	1.0	Response to Action Points from Compulsory Acquisition Hearing (CAH2)
8.82	1.0	Written Summary of Oral Submissions at the Issue Specific Hearing on the Draft Development Consent Order on 25 February 2020 (ISH4)
8.83	1.0	Response to Action Points from Issue Specific Hearing on Draft Development Consent Order (ISH4)
8.84	1.0	Written Summary of Oral Submissions at the Issue Specific Hearing on Environmental Matters on 26 February 2020 (ISH5).
8.85	1.0	Response to Action Points from Issue Specific Hearing on Environmental Matters (ISH5)
8.86	1.0	Applicant's Comments on Responses submitted for Deadline 5
8.87	1.0	Schedule of Vegetation Retention Commitments in South Downs National Park
1.5	7.0	Navigation Document
3.1	7.0	Draft Development Consent Order (clean)
3.1	7.0	Draft Development Consent Order (tracked change)
3.1	7.0	Draft Development Consent Order (word)
8.88	1.0	Draft DCO Explanation of Changes at Deadline 6
3.2	7.0	Explanatory Memorandum (clean)
3.2	7.0	Explanatory Memorandum (tracked change)
6.4	4.0	Appendix 16.1 Code of Construction Practice (clean)
6.4	4.0	Appendix 16.1 Code of Construction Practice (tracked change)
6.4	4.0	Appendix 9.5 Archaeological Mitigation Strategy (clean)
6.4	4.0	Appendix 9.5 Archaeological Mitigation Strategy (tracked change)
8.8	5.0	A Statement of Commonality of Statements of Common Ground
8.9	5.0	Compulsory Acquisition Schedule
8.49	2.0	Outline Construction Traffic Management Plan (CTMP) (clean)
8.49	2.0	Outline Construction Traffic Management Plan (CTMP) (tracked change)
8.50	2.0	Outline Landscape and Ecological Management Plan (LEMP) (clean)
8.50	2.0	Outline Landscape and Ecological Management Plan (LEMP) (tracked change)
8.51	2.0	Outline Construction Environmental Management Plan (CEMP) (clean)
8.51	2.0	Outline Construction Environmental Management Plan (CEMP) (tracked change)
8.52	2.0	Outline Community Engagement Plan (CEP) (clean)
8.52	2.0	Outline Community Engagement Plan (CEP) (tracked change)
8.53	2.0	Outline Surface Water and Foul Water Drainage Plan (clean)
8.53	2.0	Outline Surface Water and Foul Water Drainage Plan (tracked change)
8.54	2.0	REAC Signposting Document





8.57	2.0	Site Specific Plan – Queen Elizabeth Park (clean)
8.57	2.0	Site Specific Plan – Queen Elizabeth Park (tracked change)
8.58	2.0	Site Specific Plan - Turf Hill (clean)
8.58	2.0	Site Specific Plan - Turf Hill (tracked change)
8.59	2.0	Site Specific Plan - Fordbridge Park (clean)
8.59	2.0	Site Specific Plan - Fordbridge Park (tracked change)
8.60	2.0	Site Specific Plan - Southwood Country Park (clean)
8.60	2.0	Site Specific Plan - Southwood Country Park (tracked change)
8.61	2.0	Site Specific Plan - St Catherine's SANG (clean)
8.61	2.0	Site Specific Plan - St Catherine's SANG (tracked change)
8.62	2.0	Site Specific Plan - St James' School (clean)
8.62	2.0	Site Specific Plan - St James' School (tracked change)
8.63	2.0	Site Specific Plan - Ashford Road (clean)
8.63	2.0	Site Specific Plan - Ashford Road (tracked change)
8.78	2.0	Site Specific Plan - Ashford Town Centre (clean)
8.78	2.0	Site Specific Plan - Ashford Town Centre (tracked change)
8.86	2.0	Sample Vegetation Retention and Removal Plans
8.89	1.0	Schedule of Habitats Regulation Assessment Commitments
8.4.01	3.0	Signed SoCG with the Environment Agency
8.4.06	3.0	Signed SoCG with Portsmouth Water
8.4.07	4.0	Signed SoCG with South East Water
8.4.09	4.0	Signed SoCG with Thames Water
8.4.19	3.0	Signed SoCG with Highways England
8.4.22	2.0	Signed SOCG with Eastleigh Borough Council
8.4.23	3.0	Signed SoCG with Hampshire County Council
8.4.25	2.0	Signed SOCG with London Borough of Hounslow
8.4.26	2.0	Draft SOCG with Runnymede Borough Council
8.4.27	2.0	Signed SOCG with Rushmoor Borough Council
8.4.28	2.0	Signed SoCG with South Downs National Park Authority
8.4.30	2.0	Signed SOCG with Surrey County Council
8.4.31	3.0	Draft SoCG with Surrey Heath Borough Council
8.4.32	2.0	Signed SOCG with Winchester City Council