



Our reference JOHNMD/SUTTK/43283-2630
Your reference EN070005/20022766

5 March 2020

BY EMAIL

The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Sir/Madam

Application by Esso Petroleum Company Limited (Applicant) for an Order granting development consent for the Southampton to London Pipeline Project (Order)
PINS Reference: EN070005
Deadline 6 Submission

Statement of Common Ground

According to the Rule 8 Examination timetable, the applicant and Network Rail were to submit a further Statement of Common Ground to the Examining Authority during today: Deadline 6.

However, while discussions between the applicant and our client are progressing, there have been no material changes to our client's position since the submission of the first Statement of Common Ground [REP2-023] and therefore, following discussions with the applicant yesterday, we agreed to update you briefly and separately at this deadline.

We will provide a full update at Deadline 7.

Timetable for the agreement of property documents - agreed at CAH2

At CAH 2, Counsel for Network Rail confirmed to the Panel that our client awaited the first draft of the property documents that it requested from the applicant; documents that our client is willing to progress with the applicant to enable the scheme to proceed by way of agreement rather than by compulsory acquisition.

Counsel for Network Rail also confirmed to the Panel that a pre-hearing meeting had taken place with the applicant, at which it was agreed that a timetable for the agreement of the property documents would be agreed later that day (following CAH 2) between the parties.

Following this update, the Panel confirmed that it would not hear Network Rail's arguments regarding the compulsory acquisition of its property and noted that the applicant is required to submit section 127 representations at Deadline 7.

According to the timetable that we agreed with the applicant immediately following CAH 2, the Applicant's solicitors were to provide the first draft of the property documents by Friday 28 February. We agreed that Network Rail would then respond with its comments on those documents by Wednesday 4 February.

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However, we received the first draft of property agreements after 6pm this evening. We have not yet had the opportunity to review the documents but our client will continue to liaise with the applicant and hopes to progress and agree matters with the applicant before the close of the Examination.

Should the Panel have any questions please let us know.

Yours faithfully

Addleshaw Goddard LLP

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