

Southampton to London Pipeline Project

Section 51 Advice –draft Application Documents by Esso Petroleum Company Limited ('the Developer') for the Inspectorate's review

This advice relates solely to matters raised upon the Inspectorate's review of the draft application documents submitted by Esso (the Developer), and not the merits of the proposal. The advice is limited by the time available for consideration, and raised without prejudice to the acceptance or otherwise of the eventual application. It is provided to assist the preparation of the next iteration.

The following draft application documents were submitted:

- Draft DCO
- Draft Explanatory Memorandum
- Example draft Works Plans
- Example draft Land Plans

Abbreviations used [delete/add where appropriate]

PA2008	<i>Planning Act 2008</i>	BoR	<i>Book of Reference</i>	dDCO	<i>draft Development Consent Order</i>
EM	<i>Explanatory Memorandum</i>	ExA	<i>Examining Authority</i>		
PINS	<i>Planning Inspectorate</i>	SoR	<i>Statement of Reasons</i>	SoS	<i>Secretary of State</i>

General Drafting points

1. The Developer should ensure that when the dDCO is finalised, all internal references and legal footnotes are checked and that the drafting follows best practice in Advice Note (AN) 13 and 15 and any guidance on statutory instrument drafting.
2. Notwithstanding that drafting precedent has been set by previous DCOs, whether or not a particular provision in the DCO application is appropriate will be for the Examining Authority (ExA) to consider and examine taking account of the facts of the particular application and having regard to any views expressed by the relevant authorities and interested parties.
3. Where drafting precedent has been set by previous DCOs the Developer must fully justify why it is relevant to this particular DCO application.

4. The Developer should avoid using word such as “may” because of ambiguity over whether they are an imperative or a statement of future intention. If the Developer considers that the word should be used then full justification for its inclusion must be provided.

Draft Development Consent Order			
Q No.	Article (A)/ Requirement (R)	Extract from DCO (for ease of reference)	Comment/Question
1.	General draft DCO (dDCO)		The Developer should ensure that all cross references within the dDCO are checked and corrected where necessary/relevant, this includes references to any plans and we would assume this will be corrected in the application version.
2.	General draft DCO (dDCO)		The Developer will be asked to maintain a list of all plans and other documents that will require SoS certification (including plan/document references), updated throughout the examination process, and supplied to the ExA before the close of the examination
3.	General draft DCO (dDCO)		The DCO is proposed to be a Statutory Instrument (SI) and so should follow the statutory drafting conventions. The dDCO (and any subsequent revisions) should be in the form required by the statutory instrument template (see Planning Inspectorate AN13 and AN15) and validated as such using the current SI template, including detailed footnotes to all statutory references.
4.	General draft DCO (dDCO)		The application dDCO and any subsequent versions submitted to the examination: <ul style="list-style-type: none"> • should be supplied in both .pdf and Word formats, the latter showing any changes from the previous version by way of tracked changes, with Word comments briefly outlining the reason for the change?

Draft Development Consent Order			
Q No.	Article (A)/ Requirement (R)	Extract from DCO (for ease of reference)	Comment/Question
5.	General draft DCO (dDCO) – Deemed consent		A number of articles contain provisions deeming consent to have been granted in the absence of a response from the consenting authority. The Developer should seek the views of the consenting authorities on these provisions prior to submitting the application.
6.	General draft DCO (dDCO): references to Part 1 of the 1961 Act		A number of Articles make provision for " <i>compensation to be determined, in case of dispute, under Part 1 of the 1961 Act</i> ". It is acknowledged that a provision in this form is in the various Model Provisions and is commonplace in DCOs and other Orders. However, Part 1 of the 1961 Act only relates to compensation for compulsory acquisition. In order for there to be certainty that it would apply in other situations (e.g. the temporary use of land under Articles 29 & 30), should a modification be included as with the other compensation provisions in Schedule 6? If not, why not?
7.	Article 2(1) and Article 3 (3)	<p>"commence" means beginning to carry out any material operation (as defined in section 56(4) of the 1990 Act) forming part of the authorised development other than those operations set out in article 3(3) (development consent etc. granted by this Order);</p> <p>(3) Nothing in this Order, including the Requirements, prevents the carrying out of operations consisting of site preparation and clearance, pre-construction archaeological works, environmental surveys and monitoring, installation of amphibian and reptile fencing, investigations for the purpose</p>	<p>The effect of these articles is to permit a wide range of works before discharge of the requirements. The Developer may wish to consider further explanation for the necessity and acceptability of this, particularly with reference to requirements directed at the works such as requirements¹² (archaeology) and 13 (EMP). The EM should explain why it is necessary to undertake these works before discharge of requirements and clarify any impacts of these works, so that the ExA can consider whether this article is justified in relation to all these works or whether it is more appropriate that the works be controlled by a requirement.</p> <p>The DCO should not permit works outside those assessed in the ES and Developer should consider limiting these works to those assessed within the ES.</p> <p>The Developer may also wish to provide examples in the EM of the "widely precedented" approach and explain why it is relevant to</p>

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		of assessing ground conditions, diversion or laying of services, preparatory works to existing field drainage systems, remedial work in respect of any contamination or other adverse ground conditions, receipt and erection of construction plant and equipment, the temporary display of site notices and advertisements, the laying of temporary surfaces and erection of temporary buildings, structures or enclosures related to any of the works listed above, immediately upon this Order coming into force.	this proposal.
8.	Article 2(1)	"Secretary of State" means the Secretary of State for Business, Energy and Industrial Strategy	<p>The Developer may wish to consider whether this definition is necessary in light of bullet point 4 of Advice Note 15:</p> <p>https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2014/10/advice_note_15_version_1.pdf</p> <p><i>generally, a definition for 'The Secretary of State' should not be provided (government departments ask for a general Secretary of State to be assumed to allow for future changes to government machinery);</i></p>

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Q No.	Article (A)/ Requirement (R)	Extract from DCO (for ease of reference)	Comment/Question
9.	Article 3(2)	(2) Any enactment applying to land within or adjacent to the Order limits has effect subject to the provisions of this Order.	Notwithstanding the Developer's statement that there is precedent for Article 3(2) if the application is accepted the ExA may want to explore further with the Developer what enactments might apply to land within the order limits/affect the authorised development and explain how this article will ensure "consistency with legislation more generally. The Developer may like to consider including this information in the EM.
10.	Article 6 Limits of Deviation	<p>In constructing and maintaining the authorised development, the undertaker may deviate the pipeline works—</p> <p>(a) laterally within the limits of deviation for those works shown on the works plans;</p> <p>(b) vertically upwards to a limit of not less than [1.2] metres below the surface of the ground (except where ground conditions make compliance with this upwards limit impracticable in which case the upwards limit is [0.7] metres below the surface of the ground); and</p> <p>(c) vertically downwards to any extent as may be found necessary or convenient to a maximum depth of [70] metres below the surface of the ground, except that these maximum limits of deviation do not apply where it is demonstrated by the undertaker to the Secretary of State's satisfaction and the Secretary of State, following consultation with the relevant planning authority, certifies accordingly that a deviation in excess of these</p>	<p>The downward limits of deviation of 70m appears to allow a substantial variance in depth in comparison with the upward limits of 1.2m. Could more information be provided in the EM to support and explain this maximum depth?</p> <p>In regard to the final paragraph which states that the maximum limits won't apply in certain scenarios, through what process is it intended that this will be agreed with the relevant planning authority and Secretary of State? Justification for this approach is required in the EM, particularly when considering the already large degree of flexibility prescribed for in the first paragraph.</p> <p>The EM refers to the Thorpe Marsh pipeline as precedent for this approach; however the Thorpe marsh limits of deviation appear to be significantly less than those proposed for this project. The Developer may wish to explain the reasons for this in the EM.</p> <p>If the application is accepted the ExA may wish to consider and examine whether it is necessary and appropriate to permit amendment to the maximum limits of vertical deviation by the SoS at a later date without applying to amend the Order under the provisions in the PA2008. The Developer should explain in the EM why amendments to the limits should be permitted other than in</p>

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		limits would not give rise to any materially new or materially worse adverse environmental effects from those reported in the environmental statement.	accordance with the provisions of the 2008 Act and explain what process is in place for the SoS to determine whether exceeding the vertical limits would not give rise to any materially new or materially worse adverse environmental effects.
11.	Article 8 (4) Consent to transfer benefit of order	(3) The consent of the Secretary of State is required for a transfer or grant under this article, except where the transfer or grant is made to—	The Developer should identify the specific bodies to whom this applies and explain in the EM why the consent of the Secretary of State is not required to transfer or grant provisions of the order to these bodies.
12.	Article 22(1) Compulsory acquisition of rights and restrictive covenants	(1) Subject to the provisions of this article, the undertaker may acquire compulsorily the rights, and impose the restrictions, over the Order land, described in the book of reference and shown on the land plans, by creating them as well as by acquiring rights and the benefits of restrictions already in existence.	<p>This grants a very wide power for the creation of new rights and restrictive covenants over all of the Order land. This power is not limited to the creation of specific rights and restrictions as detailed in a schedule in the DCO but it is limited to the description in the BoR. The article must not enable the creation of undefined new rights or restrictive covenants. The Developer must ensure that either a schedule detailing each of these rights or restrictions is included in the dDCO, or the description of each right and restriction is clearly set out in the BoR.</p> <p>The Developer should have regard to paragraph 24 and the good practice point (see below) in Advice Note 15 https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2014/10/advice_note_15_version_1.pdf</p> <p><i>Good practice point 9</i></p> <p><i>Applicants should provide justification which is specific to each of the areas of land over which the power is being sought, rather than generic reasons and include a clear indication of the sorts of</i></p>

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			<i>restrictions which would be imposed and wherever possible the power should extend only to the particular type of Restrictive Covenant required.</i>
13.	Article 24(10) Compulsory acquisition of rights and restrictive covenants	(10) Sections 127 (statutory undertakers' land) and 138 (extinguishment of rights, and removal of apparatus, of statutory undertakers etc.) of the 2008 Act are to apply to land or rights in land acquired by the undertaker, whether compulsorily or by agreement, and to works forming part of the authorised development, as if that land and those rights were land or rights, or those works were apparatus, vested in or belonging to a statutory undertaker for the purposes of carrying on a statutory undertaking within the meaning of those provisions, but only so as to confer the protections afforded thereby and not for any other purpose whatsoever.	<p>As this is a novel provision the Developer should consider providing further justification for its necessity. In particular the Developer should refer to s.120(5) and explain why they consider this provision permissible. They may also wish to explain why the SoS should grant them status as a statutory undertaker so that they may benefit from protections which legislation only grants to statutory undertakers.</p> <p>If the Developer considers that it is permissible to include a provision of this nature the Developer will need to consider whether it is necessary to amend relevant legislation (for example the Acquisition of Land Act 1981) to secure their intention to be treated as a statutory undertaker in certain circumstances.</p>
14.	Article 29(9) Temporary use of land	<p>(4) The undertaker may not compulsorily acquire under this Order the land referred to in paragraph (1)(a)(i) except that the undertaker is not to be precluded from—</p> <p>(a) acquiring new rights over any part of that land under article 22 (compulsory acquisition of rights); or</p> <p>(b) acquiring any part of the subsoil (or rights in the subsoil of or airspace over) that</p>	Article 29(9) limits the undertakers CA powers in the land listed in schedule 7 to the acquisition of any part of the subsoil under article 27 and the acquisition of new rights under article 22. As set out above, under article 22 the creation of new rights is permitted over all of the Order land, the only limitation being that it is limited to those described in the BoR. The Developer will need to consider whether the effect of this will be that all of the land in schedule 7 will be subject to CA. If the intention is that some land will only be used temporarily the Developer should ensure that this is secured in the DCO. The Developer should explain the interaction with this

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		land under article 27 (acquisition of subsoil or airspace only).	article and article 22 in the EM / SoR.
15.	Article 31(1) Crown rights	(1) Nothing in this Order affects prejudicially any estate, right, power, privilege, authority or exemption of the Crown and, in particular, nothing in this Order authorises the undertaker or any licensee to take, use, enter on or in any manner interfere with any land or rights of any description (including any part of the shore or bed of the sea or any river, channel, creek, bay or estuary)—	The Developer should remove “to take” from article 31(1) because it is not permissible to “take” land owned by the Crown. This is in line with recently approved DCO's, for example see Article 37 East Anglia Three DCO and Article 22 Richborough connection DCO. The SoR should explain whether the Developer is seeking to CA any interest held otherwise by than or on behalf of the Crown and provide updates regarding s.135(1) and s.135(2) consent.
16.	Article 32 Special category land	So much of the special category land as shall be required for the purposes of the exercising by the undertaker of the Order rights shall be discharged from all rights, trusts and incidents to which it was previously subject.	The Developer should consider identifying the plot references for the special category land in this article and the nature of the powers sought over this land.
17.	Article 35 Disapplication and modification of legislative	2.—a) The following provisions do not apply in relation to the construction of any works or the carrying out of any operation required for the purpose of, or in connection with, the	It is noted that the dDCO and EM state that these provisions will be discussed with the relevant consenting bodies. To note, this provision will not be capable of inclusion in any Order without the consent of the relevant regulator(s) (Environment Agency and any relevant local authority/drainage board).

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	provisions	<p>construction of the authorised development—</p> <p>(a) section 24 (restrictions on abstraction) and section 25 (restrictions on impounding) of the Water Resources Act 1991⁽¹⁾;</p> <p>(b) the provisions of any byelaws made under, or having effect as if made under Schedule 25 to the Water Resources Act 1991;</p> <p>(c) regulation 12 (requirement for an environmental permit) of the 2016 regulations⁽²⁾ in respect of a flood risk activity [and a water discharge activity] [<i>Note: subject to discussion and agreement with the Environment Agency</i>];</p> <p>(d) section 23 (prohibition on obstructions etc. in watercourses) of the Land Drainage Act 1991⁽³⁾;</p> <p>(e) section 32 (variation of awards) of the Land Drainage Act 1991; and</p> <p>(f) the provisions of any byelaws made under section 66 (powers to make byelaws) of the Land Drainage Act 1991.</p>	<p>Consent is required in accordance with s.150 PA2008 and regulation 5 and schedule 2 of the The Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015.</p>

⁽¹⁾ 1991 c. 57.

⁽²⁾ S.I. 2016/1154.

⁽³⁾ 1991 c. 59.

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18.	Article 38 operational development	Development consent granted by this Order is to be treated as specific planning permission for the purposes of section 264(3)(a) of the 1990 Act (cases in which land is to be treated as operational land for the purposes of that Act).	Notwithstanding precedent in other DCOs, the Developer should explain why this power is necessary in the circumstances of this particular NSIP and identify the permitted development rights that will be made available.
19.	Article 39 Planning Permission	<p>If planning permission is issued under the 1990 Act for development any part of which is within the Order limits following the publication of this Order that is—</p> <p>(a) not itself a nationally significant infrastructure project under the 2008 Act or part of such a project; and</p> <p>(b) required to complete or enable the construction, use or operation of the development authorised by this Order</p> <p>then the carrying out, use or operation of such development under the terms of the planning permission does not constitute a breach of the terms of this Order.</p>	<p>See comments in EM below.</p> <p>This article has the potential to enable amendments to be made to the authorised development without application under the 2008 act thus circumventing the statutory process. The Developer should consider the appropriateness of this.</p> <p>As this is a novel article and the Developer should consider providing further justification for its inclusion in the dDCO. In particular to explain the necessity for the article and how it is intended to function.</p>
20.	Article 41 felling or lopping	The undertaker may fell, lop, prune, coppice, pollard or reduce in height or width, any tree, shrub, hedgerow, or important hedgerow within or overhanging land within the Order limits, or cut back its roots, if it reasonably believes it to be necessary to do so to prevent	<p>The Developer should have regard to paragraph 22.1 and the good practice point 6 in Advice Note 15 https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2014/10/advice_note_15_version_1.pdf</p> <p>Where it is known that specific hedgerows need to be removed</p>

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		the tree, shrub, hedgerow or important hedgerow— <ul style="list-style-type: none"> from obstructing or interfering with the construction, maintenance or operation of the authorised development or any apparatus used in connection with the authorised development; or from constituting a danger to persons using the authorised development. 	they should be listed in a Schedule and this article amended to refer to the Schedule. An additional paragraph should also be added to this article to the effect that any other hedgerows should only be removed once the prior consent of the local planning authority has been obtained.
21.	Schedule 1 (Authorised Development)	SCHEDULE 1 Article 2 AUTHORISED DEVELOPMENT	'Article 2' appears to the right of 'Schedule 1 Authorised Development'. Article 2 relates to interpretations. As such the Developer should consider whether the reference is correct.
22.	Schedule 1 (Authorised Development) Work 3A (In the County of Hampshire)	<i>'The Boorley Green Above Ground Installation ("the Boorley Green AGI"), being a secure compound with an approximate area of 25 metres by 30 metres and a maximum height of 3 metres, comprising equipment for the reception and launching of "pigs" for pipeline inspection, cleansing and monitoring, at the indicative point shown on Sheet [2] of the Works Plans.'</i>	"Pigs" does not appear to have been included in the list of interpretations in Article 2. The Developer should consider adding it to the list in Article 2 or provide an explanation elsewhere as to what "Pigs" are.
23.	Schedule 1 (Authorised Development) Work 3B (In	<i>'The Alton Pumping Station Above Ground Installation ("the Alton Pumping Station AGI"), being the installation of a partially buried tee-joint with a blank flange on the</i>	No dimensions have been given for the AGI. These should be provided in the dDCO when submitted for Examination or clear reference should be given, and included in the Requirements, as to where the dimensions are provided.

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	the County of Hampshire)	<i>branch connection, together with all relevant associated equipment, at the indicative point shown on Sheet [23] of the Works Plans.'</i>	
24.	Schedule 1 (Authorised Development) Work 3B (In the County of Hampshire)	<i>'The West London Terminal Above Ground Installation ("the West London Terminal AGI"), being the installation of a pig reception shaft, together with all relevant associated equipment, at the indicative point shown on Sheet [53] of the Works Plans.'</i>	No dimensions have been given for the AGI. These should be provided in the dDCO when submitted for Examination or clear reference should be given, and included in the Requirements, as to where the dimensions are provided.
25.	Schedule 1 (Authorised Development) Work 4G	<i>'to the north of Gregory Lane at the indicative point shown on Sheet'</i>	Gregory Lane is not visible on draft works plan: B2325300-JAC-000-CIV-DRG-000019.
26.	Schedule 1 (Authorised Development) Work 4R (In the County of Surrey)	<i>'Temporary project office area for use during the construction of the authorised development, comprising an area of up to 105 metres by 80 metres to the south of the A31 and the west of the undertaker's Alton Facility at the indicative point shown on Sheet [] of the Works Plans, and including—'</i>	Whilst information has been provided in relation to the development area, no dimensions have been given for the size of the temporary project office. These should be provided in the dDCO when submitted for Examination or clear reference should be given, and included in the Requirements, as to where the dimensions are provided.
27.	Schedule 1 (Authorised Development) Additional		All works (a) – (p) should be limited to works which do not give rise to any materially new or material different environmental effects to those assessed within the ES, not just work (p).

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	works (a) – (p)		The Developer should also justify the need for such a wide range of unspecified works in the EM.
28.	Requirement 3 (stages of authorised development)	3.The authorised development may not commence until a written scheme setting out all of the stages of the authorised development relevant to it has been submitted to the relevant planning authority.	<p>It is not clear how the requirement is intended to function in respect of differing relevant authorities. If requirements are to be linked to discharge of a stage it is important that development is not commenced until the stages are clearly defined. The requirement appears to permit the commencement of development once a scheme setting out all of the stages for works in a particular authority has been submitted to that authority.</p> <p>This appears contrary to the Developer's intention as set out in the EM at 8.3 which says that requirement 3 " provides for the production of a single staging plan for the proposed development before development commences".</p> <p>The Developer should consider the drafting of this article and ensure that it achieves this.</p>
29.	Requirement 4 (scheme design)	<i>'The authorised development must be carried out in general accordance with the design drawings'</i>	<p>We note that this wording was used in the Hinkley Point C Connection Project, however it's inclusion in this draft DCO must be justified in relation to this specific proposal, why it is felt appropriate that the authorised development for this project is to be carried out only in 'general' accordance with the design drawings, as opposed to in accordance with the design drawings.</p> <p>How does this Article relate to the proposed limits of deviation as shown on the works plans?</p>
30.	Requirement 5 (Code of construction)	The authorised development must be undertaken in accordance with the approved CoCP, or with such changes to that document	The CoCP is defined as the CoCP submitted with the application and certified by the SoS. This would mean in effect that no changes could be made to this document during examination. The

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Q No.	Article (A)/ Requirement (R)	Extract from DCO (for ease of reference)	Comment/Question
	practice)	as agreed by the relevant planning authority	Developer should consider whether this reflects their intention. The requirement also contains a tailpiece which enables the LA to permit amendments to the CoCP submitted with the application. The Developer should have regard to paragraph 17.4 of Advice Note 15.
31.	Requirement 6 (construction traffic)	No stage of the authorised development must commence until, for that stage, a construction traffic management plan ("CTMP") has been submitted to and approved by the relevant planning authority in consultation with the relevant highway authority. The CTMP for each stage must reflect the outline construction traffic management plan and the mitigation measures set out in the environmental statement	The Developer should consider whether the outline construction traffic management plan should be defined as a document to be certified by the SoS in Article 2
32.	Requirement 14 (Construction hours)		The Developer is seeking flexible requirements in relation to Construction hours. The Developer should justify its approach to requirement 14 in its entirety and confirm whether this has been discussed with the relevant LAs.
33.	Requirements – Part 2 18(2)		The Developer should provide further justification for a deemed consent provision for the discharge of requirements which secure essential mitigation. In particular the Developer should explain why the procedure for an appeal against non-determination of an application to discharge a requirement is not appropriate for their project. The Developer should explain why they have not followed the standard drafting for procedure for discharge as set out in Appendix 1 of Advice Note 15

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			https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2014/10/advice_note_15_version_1.pdf
34.	Requirements - Part 2	<i>Further information (Requirement 20)</i>	<p>The Developer has provided a deadline of '2 <i>business days</i>' several times in Requirement 20. The Developer should justify why it considers this to be a reasonable period of time and should confirm whether this deadline has been discussed with the relevant LAs.</p> <p>The Developer should explain why they have not followed the timescales suggested in appendix 1 of Advice Note 15</p>

Draft Explanatory Memorandum			
Q No.	Paragraph	Extract from EM	Question/comment
1.	General draft EM (EM)		<p>Generally, the EM tends to explain the <i>effect</i> of the relevant provision in the DCO, rather than explaining <i>why</i> it is necessary.</p> <p>The EM should also provide more detail and justification where a provision departs from the model provisions or a precedent. (See AN13 and 15).</p> <p>This should include reference to the particular circumstances of this development and an explanation as to why this is necessary or desirable.</p>

Draft Explanatory Memorandum			
Q No.	Paragraph	Extract from EM	Question/comment
2.	General EM		Further explanation and evidence (including the outcomes of any consultation) is required to explain why the content of each article, schedule etc to the dDCO is relevant and required for this proposal. Please refer to AN15.
3.	Para 4.5 And 6.164	'Esso has chosen not to differentiate the NSIP and associated development works in Schedule 1'.	<p>The Developer should provide a justification for this approach and why it is considered to be appropriate.</p> <p>How does the above relate to Article 39 'Planning Permission' within the dDCO? For example could this Article enable changes to any associate development which may be granted by the Order? If this is the case, how will the decision to not differentiate between the NSIP and Associated Development affect this.</p>
4.	Schedule 9 Protective provisions	Protective Provisions	The Developer should try to agree these with the relevant parties prior to submission. If agreement has not been reached the Developer should explain any differences between the parties and put the case for their provisions in the EM.

Draft Works Plans			
Q No.	Work Plan Ref	Extract from Schedule 1: Authorised Development (PART 1)	Question/Comments
1.	B2325300-JAC-000-CIV-DRG-000019 Works Plan Sheet 9		<p>See above comment in regard to work 4G and Gregory Lane.</p> <p>Work 8D should be coloured/shaded and included in the plan Legend.</p> <p>Work 8D continues to the South East to what appears to be a compound above Rooks Grove. The description in the dDCO doesn't make clear if the access is also to Rooks Grove or if this is a</p>

Draft Works Plans			
Q No.	Work Plan Ref	Extract from Schedule 1: Authorised Development (PART 1)	Question/Comments
			<p>compound – though there is no shading to suggest it is a compound.</p> <p>The dDCO describes the access as being in proximity to Wheely Down Farm Road – the plan shows this as Wheely Down Farm Lane</p> <p>Descriptions should also be included in the plan Legend where appropriate for example CO = Compound.</p>
2.	B2325300-JAC-000-CIV-DRG-000052 Works Plans Sheet 42		The Developer should consider colouring/shading access and including it in the plan Legend. Is it intended for the final submission version of the plan to include 'TBC' in relation to access?
3.	B2325300-JAC-000-CIV-DRG-000114 Works Plan Sheet 114		As above.
Draft Land Plans			
Q No.	Work Plan Ref	Extract from Schedule 1: Authorised Development (PART 1)	Question/Comments
	ESSO-LAND PLAN-114		The Developer should consider use of enlargement of area around Woodcock Drive to aid clarity
	ESSO-LAND PLAN-42		Is not clear where the plot boundary is between plots 2025 & 2028. Is this information present in sheet 43?