

# Southampton to London Pipeline Project

## Volume 6

Environmental Statement (Volume D)  
Appendix 5.2: Responses to the Scoping Report  
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**Contents**

**Appendix 5.2: Responses to the Scoping Report .....1**



## Appendix 5.2 Responses to the Scoping Report

Consultee	Key Issues	SLP Project Response
Crandall Parish Council	Concern regarding the traffic management along narrow streets throughout the parish, especially Crandall village.	A Transport Assessment ( <b>application document 7.4</b> ) is submitted with the application for development consent. This details proposed traffic measures that would be in place on the project. A Construction Traffic Management Plan (CTMP) would be produced. The contractor(s) would then implement measures within the CTMP. (G110).
Environment Agency	Fish and aquatic species should be scoped into the ES for 'mortality and injury' and 'disturbance'. Mitigation measures to protect migratory fish at watercourse crossings need to be defined. Biosecurity measures also need to be included in the ES. The ES should consider impacts of construction techniques on migratory fish and/or eels.	Chapter 7 Biodiversity includes an assessment on fish. Trenchless crossing methods are being used to cross the most sensitive of watercourses. There is also a good practice measure relating to migration periods: Open cut crossings on five watercourses would be subject to constraints. The tributary of Cove Brook (WCX047) would be subject to constraints between March and May. The tributary of the River Hamble (WCX007), ditch leading to the tributary of the River Hamble (WCX006), Caker Stream (WCX012) and Ryebidge Stream (WCX021) would be subject to constraints between October to December and March to May. At all five locations, works undertaken in the channel or close to bank tops would be reduced/restricted during these sensitive periods (G171).  In addition, a fish rescue would be undertaken at any watercourse crossings that would require isolation and dewatering to prevent fish being trapped, injured or killed during dewatering. Fish would be returned to suitable habitat on the same water body unaffected by the works (G49).
Environment Agency	Requirement for the pipeline crossing technique at Ford Lake Stream to be confirmed.	The construction technique for each river crossing has been defined in Appendix 3.1 Table of Trenchless Crossings. Ford Lake Stream is identified as a trenchless crossing (TC001).
Environment Agency	An 8 metre buffer zone should be used for any works, roads or compounds associated with watercourse crossings.	Appropriate buffer zones would be established within Order Limits adjacent to identified watercourses (G39).
Environment Agency	The ES should include an assessment of water vole and otter for both 'mortality and injury' and 'habitat loss'.	Chapter 7 Biodiversity includes an assessment on water vole and otter. This is supported by survey data included within Appendix 7.12 Riparian Mammal Factual Report. No otter holts or lying-up areas have been identified by baseline surveys to date, although otter are



Consultee	Key Issues	SLP Project Response
		present in the wider area. Water vole absence has been confirmed from all watercourses. Good practice measures would further reduce the risk of mortality and injury to both species and these are described in Appendix 7.17 Protected and Controlled Species Legislation Compliance Report and Chapter 16 Environmental Management and Mitigation.
Environment Agency	An overarching Flood Risk Assessment (FRA) should be produced for the scheme as a whole.	An FRA has been submitted with the application ( <b>application document 7.3</b> ). A draft FRA was submitted to the Environment Agency for comment in March 2019 in advance of the application for development consent.
Environment Agency	The ES must provide justification for assigning SPZ2 medium sensitivity value and SPZ3 low sensitivity value.	Clarification and justification for the sensitivity values used in the assessment are provided in Chapter 8 Water.
Forestry Commission	A thorough assessment of any loss of all trees and woodlands within the project boundary and the development of mitigation measures to minimise any risk of net deforestation as a result of the scheme should be included in the ES.	Chapter 4 Design Evolution describes how the project has avoided ancient woodland and many other tree groupings. The impact to trees is assessed in Chapter 10 Landscape and Visual.
Forestry Commission	The project should consider compensation and the use of buffer zones to enhance the resilience of neighbouring ancient woodlands.	Working widths would be reduced in specific locations where trees or hedges are present. Where notable trees would be retained within or immediately adjacent to the Order Limits, the trees and their root protection areas (RPAs) would be protected where they extend within the Order Limits and are at risk. This would be by means of fencing or other measures (G65). The Project Team also met with the Forestry Commission to agree the approach for the assessment.
Forestry Commission	The project is encouraged to consider incorporating measures to build on the existing network of green infrastructure linking towns to the adjacent countryside, especially when assessing the health and wellbeing of the local residents. An embedded 'environmental net gain' principle for the scheme as promoted in the government's 25 Year Environment Plan should be included in the ES.	Where there are opportunities to enhance an area, the project is keen to understand the suggestions of consultees. An environment investment programme will be developed. Opportunities that are taken forward would need to be aligned with the project's proposals and be feasible within the timeframes.
Forestry Commission	Locally sourced timber should be used in construction of appropriate structures.	Sources of materials would be identified by the future contractor(s).
Forestry Commission	It is recommended that any loss of trees or woodlands as part of this DCO are included in the assessment to secure delivery of the Government's legally binding framework to cut emissions.	The loss of trees and woodland is included within the landscape assessment. Relevant good practice measures are as follows:



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		<ul style="list-style-type: none"> <li>Vegetation clearance, retention, protection and replanting/reinstatement drawings would be produced prior to the construction phase. The contractor(s) would implement these plans including agreed mitigation where practicable. (G88).</li> <li>Where woodland vegetation is lost and trees cannot be replaced due to the restrictions of pipeline easements, native shrub planting approved by Esso would be used as a replacement (G97).</li> </ul>
Forestry Commission	The project is encouraged to utilise a range of additional documents and guidance notes in relation to ancient woodland and veteran trees.	Relevant guidance has been reviewed when developing the ES. Ancient Woodland and veteran trees are assessed in Chapter 10 Landscape and Visual.
Forestry Commission	It is considered prudent to ensure all woodland related grant schemes and woodlands with a felling license are assessed and where appropriate included in the ES.	The effects on woodland grant schemes have been assessed in Chapter 12 Land Use. Following completion of construction, all areas subject to land management agreements that have been disturbed would be reinstated, wherever possible, to their former condition in accordance with the DCO requirements. Therefore, the temporary disruption to land management agreements has a small magnitude of change is assigned.
Forestry Commission	The ES should assess the impacts to all woodlands and identify appropriate measures to avoid, reduce or compensate for significant effects.	The route has been designed to avoid ancient woodland and other woodland where possible, To further reduce damage to woodland, the contractor would consider and apply, where practicable, the relevant protective principles set out in the National Joint Utilities Group Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees ('NJUG Volume 4' (2007)). This would be applied to trees within the Order Limits which will be preserved through the construction phase, and to trees outside of the Order Limits where such measures do not hinder or prevent the use of the relevant working width for construction (G95).
Hampshire County Council (Archaeology)	The new National Planning Policy Framework (NPPF) (published in July 2018) should be used in the ES.	The National Policy Statement (NPS) for Energy, was the policy document used for the assessment. The new NPPF has been used where relevant within the ES.
Hampshire County Council (Archaeology)	It would be useful for the report to have a section that lists those assets that lie within the proposed route and will be directly impacted by construction works.	A full list of archaeological assets likely to be impacted by construction has been included in Appendix 9.4 Potential Effects on the Historic Environment.



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Hampshire County Council (Archaeology)	It would be preferable to see the EIA set out a trial trenching program that involves evaluation of the entire route where trenching is practicable, the only exceptions being areas where modern development has not heavily impacted sub-surface deposits.	Appendix 9.5 Archaeological Mitigation Strategy sets out the proposals relating to trial trenching. This was submitted to the County Archaeologists for comment prior to the application for development consent.
Highways England	Traffic assessments should be undertaken in accordance with Department for Transport Circular 02/2013 "The Strategic Road Network and the Delivery of Sustainable Development". Highways England are interested in the potential impact that the construction trips might have upon the M25 and A30. Highways England are interested as to whether there would be any adverse safety implications or material increase in queues and delays on the strategic road network as a result of development, with particular reference to Heavy Goods Vehicles (HGVs).	The project would have no permanent perceptible traffic generation because operational trips would be negligible. DfT Circular 02/2013 does not present specific guidance for a pipeline project. A Transport Assessment is submitted with the application for development consent ( <b>application document 7.4</b> ). This presents a forecast of traffic demand and likely impacts for construction of the project. It identifies measures to manage impacts on the road network.
Historic England	The ES should address the apparent discord between Chapters 9 and 10 in terms of what has been scoped in to the next stage of assessment regarding designated assets.	Designated assets have been assessed in Chapter 9 Historic Environment and historic buildings were added to the scope of the assessment. Appropriate cross referencing has been used between Chapters 9 and 10 Landscape and Visual with regards to designated assets.
Historic England	Chapters 9 and 10 of the ES should consider published Historic England guidance to ensure impacts not considered in the Scoping Report are not missed from the assessment.	Relevant guidance has been reviewed when developing the ES.
Historic England	Local Conservation Area appraisals should be used within the baseline data, specifically the Hounslow Urban Context and Character Study, and Basingstoke Canal and Farnborough appraisal.	The appropriate Local Conservation Area appraisals have been used for the assessment in Chapter 9 Historic Environment and associated appendices.
Historic England	The new NPPF (published in July 2018) should be used in the ES.	The National Policy Statement (NPS) for Energy, was the policy document used for the assessment. The new NPPF has been used where relevant within the ES.
Historic England	It is not considered necessary to further assess the part of the route within the Greater London Authority (GLA) for undesignated archaeology due to the nature of the environment.	For consistency, all heritage assets within the study area have been assessed equally and consideration was given to the nature of their environment in the assessment of potential impact. Further details can be found in Chapter 9 Historic Environment and the associated appendices.
Historic England	It is recommended Scheduled Monuments are scoped in to the EIA (both within and outside the 300m Order Limit, construction phase).	Effects to Scheduled Monuments within the 1km study area are assessed in Chapter 9 Historic Environment. A full list of



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		archaeological assets has been included in Appendix 9.4 Potential Effects on the Historic Environment.
Health and Safety Executive	Esso is expected to recognise the general requirements of Pipeline Safety Regulations and design, construct, test, commission and operate the pipeline.	The Pipeline Safety Regulations have been considered when designing the project.
National Grid	It is requested that potential impacts to National Grid infrastructure are considered within the ES.	The details of impacts to National Grid infrastructure can be found in a Draft Statement of Common Ground between Esso and the National Grid ( <b>application document 7.2</b> ).
Portsmouth Water	Portsmouth Water consider solution features to be key to the ES and would expect them to be assessed throughout Chapter 8 and 11 of the ES. Effects on karstic landscapes should be included in the ES and all areas of suspected/demonstrated karstic features should be designated as high sensitivity.	The effects on karstic and solution features have been assessed in Chapter 8 Water. For aquifers with fracture flow, particularly for flow in aquifers with karstic features, suspended solids can move long distances and rapidly. The risks would be greatest for the Chalk unconfined Principal aquifer in GWSA-B which has high value and in karstic areas of the Chalk where solution features are present. With the good practice measures in place there is not expected to be a significant effect on these features.
Portsmouth Water	The designated Secondary A Aquifer the Lambeth Group should be included in the assessment. The boundary of GWSA-A/B should also be included due to potential interconnectivity between the Secondary A Lambeth Group and underlying Principal Chalk Aquifer. The boundary of Area GWSA-A/B where the Chalk is semi-confined and excavations/deep works may cause turbidity should be scoped in to the ES. Areas where shallow groundwater is contributing to groundwater in Principal Aquifers should be considered a matter of significance for the water environment.	Aquifers including the Lambeth Group and any potential interconnectivity has been assessed in Chapter 8 Water. With the good practice measures in place there is not expected to be a significant effect on the Secondary A Aquifer.
Portsmouth Water	It is requested that further investigation takes place surrounding clay with flint superficial deposits in GWSA-B.	British Geological Society soluble rock maps have been used to assess clay with flint superficial deposits in Chapter 8 Water.
Portsmouth Water	Consideration should be given to unstable ground including natural cavities.	The ground investigation programme will inform the ground conditions present on the project. This information will be used to inform the engineering design development as the project progresses.
Portsmouth Water	It would be preferable for industrial estates to be reclassified to Moderate to High risk in the contaminated land assessment.	The risk assessment has been based on standard industry guidelines. Further details can be found in Chapter 11 Soils and Geology.





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Portsmouth Water	Migration of impacted material/leachate along the new pipeline exterior should be considered as a pathway when assessing impacts to controlled waters.	The pipeline as a pathway is considered in Chapter 8 Water.
Public Health England	Where issues are scoped out of the assessment due to the risk being negligible sufficient documentation to provide full evidence based justification should be provided.	Appendix 13.4 Human Health Technical Note explains why topics have been scoped in and out of the assessment.
Public Health England	Public Health England has provided their generic guidance for producing an ES.	Relevant guidance has been reviewed when developing the ES.
Royal Mail	Royal Mail requests that the ES includes information on the needs of major road users (such as Royal Mail).	Appendix 13.1 Traffic and Transport Technical Note includes details of the needs of major road users where relevant to the assessment.
Royal Mail	The ES should address the potential cumulative traffic effects arising from the construction of the pipeline together with all other proposed major developments in the area.	Chapter 15 Cumulative Effects includes a qualitative cumulative effects assessment of traffic effects arising from the project in combination with other major developments.
Runnymede Borough Council	The ES should ensure that all local Sites of Nature Conservation Importance (SNCIs) are assessed including Chertsey Meads. It would be preferred that the Chertsey Meads LNR is also assessed for hydrological change.	Impacts on SNCIs including Chertsey Meads, including hydrological change, have been assessed in Chapter 7 Biodiversity and Chapter 8 Water. The potential impact on the high value habitats in Chertsey Meads LNR is of small magnitude due to the avoidance of the most sensitive habitats, the small proportion of the entire site impacted and the proposed good practice measures. With the good practice measures in place there is not expected to be a significant effect on Chertsey Mead LNR and SNCI.
Runnymede Borough Council	The project will need to consider impacts on ecological designated sites including other priority habitats and priority species; designated Local Green Space where richness of wildlife has been identified as a contributing factor to its designation; any area in Runnymede that may be in the future identified as a Nature Improvement Area; and trees considered to make a significant contribution to their surroundings, individually or as a group.	Chapter 7 Biodiversity includes an assessment on non-statutory designated wildlife sites, priority habitats and species. With good practice measures in place, there is not expected to be a significant effect on priority habitats or species. The Habitats Regulations Assessment (HRA) Report ( <b>application document 6.5</b> ) includes an assessment of how potential impacts on Suitable Alternative Natural Greenspace may affect European sites. Notable trees (individuals and groups) are considered within Chapter 10 Landscape and Visual and are listed in Appendix 10.2 Schedule of Notable Trees.
Runnymede Borough Council	The Council will be seeking net gains in biodiversity, the ES should contain information regarding how this will be achieved.	Where there are opportunities to enhance an area, the project is keen to understand the suggestions of consultees. An environment investment programme will be developed.



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Runnymede Borough Council	For areas where the project affects national, regional or locally protected sites not forming part of a Ramsar, SPA or SAC the ES will need to demonstrate that the benefits of the development proposal clearly outweigh the harm to the site and has followed the hierarchy of mitigation.	Chapter 4 Design Evolution describes how protected sites have been avoided during the development of the project where practicable. Chapter 7 Biodiversity and the project's HRA Report ( <b>application document 6.5</b> ) includes an assessment on protected ecological sites of all levels. This demonstrates that with good practice measures in place, there is not expected to be a significant effect on protected sites.
Runnymede Borough Council	It is recommended that data sets are used for the baseline conditions including: <ul style="list-style-type: none"> <li>• RBC commissioned surveys from Surrey Wildlife Trust and others</li> <li>• Surrey Wildlife Trust have carried out surveys on site</li> <li>• Expert advisers from the Chertsey Meads Management Liaison Groups including qualified botanists and ornithologists</li> <li>• Surrey Bat Group (approached but not yet responded) hold information about the bat species on site including at bat hibernaculum set aside for the purpose</li> <li>• Findings from the council run bat and orchid counting sessions</li> </ul>	Data sets have been obtained from all the relevant authorities. This has included records from Hampshire Biodiversity Information Centre, non-statutory sites from Surrey Biodiversity Information Centre and data from Hampshire and Surrey Bat Groups, the Surrey Amphibian and Reptile Group and the West Surrey Badger Group. Targeted site surveys have been undertaken in areas where significant effects were anticipated. The information sources and survey extents are described in Chapter 7 Biodiversity and the supporting appendices.
Runnymede Borough Council	A viewpoint should be included that assesses the significance of potential visual impact of the loss of trees of Dumpsey Stump.	Trees would largely be retained at Dumpsey Stump through the application of good practice measures as described within Chapter 10 Landscape and Visual. Therefore, the viewpoints were not amended.
Runnymede Borough Council	A watching brief should be maintained at all times along the route, for an unexpected visual or olfactory evidence of contamination.	Commitment G71 outlines the approach that would be taken to areas of contaminated land. A Land Contamination Suitably Experienced Person (SEP) would be appointed. They would have practical experience in brownfield earthworks and be able to use their professional judgment to take a proportionate approach to the assessment of potential for ground contamination based on the desk study information and field observations. Their work would be on a targeted basis (G72).
Rushmoor Borough Council	Every waterway within the borough is impacted by the development. These are the Ively Brook, Cove Brook, River Blackwater, Unnamed Tributary near Farnborough and the Basingstoke Canal. The ES should consider the individual and in-combination impacts on the water environment and any surrounding wetland habitat.	A watercourse crossing assessment has been included within the FRA, which assesses the effects on each watercourse. A summary of the assessment and overall effects on watercourses is included within Chapter 8 Water, including where relevant, effects on surrounding groundwater dependent habitats.



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South Downs National Park Authority	Due to the length of the pipeline the use of work sections to break up the assessment would be useful, especially in regard to the section passing through the National Park.	The project has been split into sections for communication purposes. The sections are shown on the majority of ES figures. The assessment has been split in most cases by the receptors affected rather than geographical sections to avoid repetition.
South Downs National Park Authority	The approach to vegetation loss should be standardised within the ES and the methodology for mitigation clarified.	<p>Project-wide good practice measures include the following commitments in relation to vegetation loss and planting:</p> <ul style="list-style-type: none"> <li>• Commitment to only utilise a 10m width when crossing through boundaries between fields where these include hedgerows, trees or watercourses (O1).</li> <li>• Design route alignment to avoid all areas of existing classified Ancient Woodland (O2).</li> <li>• Working widths would be reduced in specific locations where trees or hedges are present. Where notable trees would be retained within or immediately adjacent to the Order Limits, the trees and their root protection areas (RPAs) would be protected where they extend within the Order Limits and are at risk. This would be by means of fencing or other measures (G65). For trenchless crossings TC001 to TC015, TC019, TC021 to TC028, TC030 to TC040, vegetation would be retained except where emergency access is required to trenchless equipment or ecological works have been proposed. At TC029 vegetation would be retained to the east of Hardwick Lane but not to the west side due to the requirement for access. At TC016, TC017 and TC018, there would be limited removal of vegetation along the alignment of the existing pathway to allow for pipe stringing (G175).</li> <li>• Vegetation clearance, retention, protection and replanting/reinstatement drawings would be produced prior to the construction phase. The contractor(s) would implement these plans including agreed mitigation where practicable. (G87).</li> <li>• The contractor(s) would retain vegetation where practicable and in accordance with, as a minimum, the vegetation retention drawings. (G91).</li> <li>• Hedgerows, fences and walls would be reinstated to a similar style and quality to those that were removed, with landowner agreement (G93).</li> </ul>



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		<ul style="list-style-type: none"> <li>Where possible, reinstatement of vegetation would generally be using the same or similar species to that removed (subject to restrictions for planting over and around pipeline easements) (G88).</li> <li>Where woodland vegetation is lost and trees cannot be replaced due to the restrictions of pipeline easements, native shrub planting approved by Esso would be used as a replacement (G97).</li> </ul> Additional planting to mitigate for cumulative effects caused by vegetation loss is identified in Chapter 15 Cumulative Effects.
South Downs National Park Authority	The baseline data for the assessment of vegetation loss should include land cover mapping, priority habitat mapping and woodland/hedgerow mapping.	Each chapter sets out the data sets that have been used to inform the baseline and the assessment. Datasets have included aerial photography, Ordnance Survey mapping, National Tree Datasets and project specific surveys to map habitats and key sites.
South Downs National Park Authority	It is recommended that purpose 2 of the SDNP (promote opportunities for the undertaking and enjoyment of the special qualities of the national parks by the public) is also included in the landscape assessment.	Appendix 2.2 Regional and Local Planning Policy discusses relevant planning policy. Chapter 10 Landscape and Visual includes an assessment of visual effects on recreation users, where the purpose of that recreation is enjoyment of the landscape.
South Downs National Park Authority	Effects on Tranquillity within the SDNP should be appropriately considered including the effects of traffic activity, construction compounds, constructional processes and the number of employees working. SDNP has an established process for undertaking tranquillity assessments which could be utilised. The following additional construction effects have been identified for inclusion in the ES: <ul style="list-style-type: none"> <li>Noise and intrusion in remote areas within the SDNP due to vehicle, plant and human sounds; and</li> <li>Additional signage, new industrial site entrances.</li> </ul>	Tranquillity (noise and intrusion in remote areas) has been assessed within Chapter 10 Landscape and Visual. SDNP Authority has provided the project team with a tranquillity shapefile to inform the baseline assessment. Proposed construction compounds have been placed near roads, which would reduce the overall effect on tranquillity. The effects on tranquillity would not be significant because they would be restricted to the temporary construction period and would largely be transient and of short duration. Required temporary signage for construction would be agreed with the relevant Highways Authority. The visual effects of the construction works as a whole are considered within Chapter 10 Landscape and Visual.
South Downs National Park Authority	The ES should include representative viewpoints and assessments of the compounds within the SDNP.	Assessment of compounds is considered within the assessment of landscape effects and Representative Viewpoints within Chapter 10 Landscape and Visual. An assessment of viewpoints can be found in Appendix 10.3 Visual Impact Schedules.



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South Downs National Park Authority	It is recommended that a single methodology is used for the protection of existing trees and it would be preferable to use BS5831 – ‘Trees in relation to demolition design and construction 2013’.	The contractor would consider and apply, where practicable, the relevant protective principles set out in the National Joint Utilities Group Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees (‘NJUG Volume 4’ (2007)). This would be applied to trees within the Order Limits which would be preserved through the construction phase, and to trees outside of the Order Limits where such measures do not hinder or prevent the use of the relevant working width for construction (G95).
South Downs National Park Authority	It is important to understand the definition of ‘short period’ in relation to the closure of PRow and how this will be managed.	The works would require road, lane and footpath (pavement) closures and diversions for reasons of safety and the project would work to limit the impact of these works. Any work areas would be fenced off with appropriate safety signage and secure fencing. All designated Public Rights of Way would be identified, and any potential temporary closures or diversions applied for/detailed in the DCO. All designated Public Rights of Way crossing the working area would be managed, including National Trails, with access only closed for short periods while construction activities occur (G114). The project has consulted Hampshire County Council about footpaths.
South Downs National Park Authority	Closure of access land during construction should be assessed using the same methodology as the PRow assessment.	Construction within access land would be short term given the open nature of the land while good practice measures would reduce disruption in such areas further. Access land does not require closure or diversion notices and the management of this land during construction would be agreed with the relevant landowner.
South Downs National Park Authority	The assessment should consider Public Rights of Way (PRow) within SNDP to be a tourism receptor.	Chapter 13 People and Communities sets out the scope of the tourism assessment. Tourist attractions including the South Down Way have been included within the assessment. The assessment accounts for, but does not assign a significance to, the potential effects on individual tourism receptors.
Spelthorne Borough Council	Justification needs to be given when work is scheduled outside the Spelthorne Borough Councils normal working hours for construction (Monday to Saturday 08:00 to 18:00 Monday to Friday and 08:00 to 13:00 Saturday). Where construction works are required to continue 24 hours a day additional mitigation should be sought and a more stringent assessment carried out.	Construction would take place during the normal working hours of 07:00 to 19:00 Monday to Saturday. Sunday or Bank Holiday working is not anticipated as being typical.  Exceptions may be required for Bank Holiday and Sunday working (restricted to 08:00 to 18:00) or night-time working for activities such as: the continuous pulling phase for a major crossing using HDD;



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		where daytime working would be excessively disruptive to normal traffic operation; cleaning/testing of the pipeline; or overnight traffic management measures.(G5. The contractor would be required to produce a Noise and Vibration Management Plan for the approval of the relevant planning authority. The Noise and Vibration Management Plan would, having regard to the approved operational hours, set out, where applicable, the best practicable means that would be used to reduce noise and vibration during installation (G99).
Spelthorne Borough Council	The ES should clarify the methodology for calculating Heavy Duty Vehicles (HDV) traffic movements, specifically does this include movements relating to importing aggregate/inter material and top soil.	The methodology for calculating HDV traffic movements is included in the Transport Assessment ( <b>application document 7.4</b> ).
Spelthorne Borough Council	Dust monitoring should not solely focus on properties on the site boundary but also access road junctions, local footpaths and PRow and other sensitive receptors.	The dust assessment can be found in Appendix 13.2 Air Quality Technical Note. This follows the requirements set out in the Institute of Air Quality Management guidance.
Spelthorne Borough Council	The draft Code of Construction Practice (CoCP) does not set out emission standards for Non-Road Mobile Machinery (NRMM) or HDV emission standards, such as achieving fleet standards of EURO VI or better, or FORS/CLOCS fleet accreditation standards.	The Register of Environmental Actions and Commitments (REAC) in Chapter 16 Environmental Management and Mitigation contains the following commitment: Plant and vehicles would conform to relevant applicable standards for the vehicle type, would be correctly maintained and operated in accordance with manufacturer’s recommendations and in a responsible manner.G22).
Spelthorne Borough Council	The methodology for determining sensitivity in the Scoping Report has the potential to under value the effects on local residents, steps should be taken to make sure this is not the case in the ES.	Residential receptors have been collectively assessed by assigning a sensitivity value to the overall community in Chapter 13 People and Communities.
Spelthorne Borough Council	In relation to pre-construction surveys it is recommended that in conveyance with onsite surveys to determine species presence, suggested mitigation factors would also be determined by ecological contractors and subsequently acted upon.	The REAC contains a number of measures that the contractor would follow to avoid or reduce ecological impact. A suitably experienced Environmental Manager would be appointed for the duration of the construction phase. A qualified and experienced Environmental Clerk of Works (ECoW) would be available during the construction phase to advise, supervise and report on the delivery of the mitigation methods and controls outlined in the CEMP. The ECoW would be supported as necessary by appropriate specialists (G3). Pre-construction surveys would be completed if existing baseline survey data need to be updated or supplemented (G33). Ecological considerations would be included in the induction talks for all relevant





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		site personnel. Species-specific or location-specific toolbox talks would also be provided, as required (G172).
Spelthorne Borough Council	There are a number of standard industry reference documents that set out best practice for investigations, assessment and remediation methodologies that are absent from the Soils and geology chapter of the scoping report which should be included in the ES.	Relevant guidance has been reviewed when developing the ES.
Spelthorne Borough Council	Justification should be provided in the ES as to why the risk of contamination during operation is not considered significant and include details of the operation of the existing aviation fuel pipeline and previous fuel losses.	The principles of inherent safe design have been incorporated into the design of the pipeline as per Esso design standards for fuel pipelines, relevant industry codes of practice and standards and the requirements of the Pipeline Safety Regulations 1996 (O8). The risk of contamination during operation is considered to be very low and is addressed within Chapter 14 Major Accidents.
Spelthorne Borough Council	The Scoping Report does not define what assessment criteria have been used to determine the magnitude of change with respect to land contamination, this should be rectified in the ES.	Clarification on assessment criteria can be found in Chapter 11 Soils and Geology. The process of contamination risk assessment is defined within Appendix 11.1 Soils and Geology Supporting Information and is based on Contaminated Land Report 11, CLR11.
Spelthorne Borough Council	The human health effects of land contamination need to be scoped in to the ES, whether in the Human Health Assessment or the Soil and Geology Chapter.	The effects of potential land contamination on human health have been assessed as part of the Conceptual Site Model (CSM) and risk assessment set out within Chapter 11 Soils and Geology. The good practice measures within the CoCP would reduce the risks to health from land contamination during construction.
Spelthorne Borough Council	The impact of dust/sediment on urban areas should be included in the intra-development cumulative effects assessment or justification needs to be given why it has been excluded when noise and vibration has been included.	The dust assessment can be found in Appendix 13.2 Air Quality Technical Note. This follows the requirements set out in the Institute of Air Quality Management guidance.
Spelthorne Borough Council	When determining which development to include in the cumulative effects assessment it will be necessary to utilise local knowledge to ensure all schemes likely to be brought forward during the construction period are included in the assessment.	The Local Planning Authorities were consulted on the scope of the long and short lists included within Chapter 15 Cumulative Effects and the responses have informed the chapter. The chapter includes the list of developments with potentially overlapping construction programmes.
Spelthorne Borough Council	It would be useful if the long list of inter-development cumulative effects was grouped by sections of the route or local authority area to aid the review process.	The long list of developments has been listed by Local Planning Authority in Chapter 15 Cumulative Effects.



Consultee	Key Issues	SLP Project Response
Spelthorne Borough Council	Clarification is sought on how traffic movements will be distributed along road links. The methodology for converting the number of vehicle movements to Passenger Car Movements differs from the TfL modelling guidance, this guidance should be applied in the ES or, if an alternative method is used, justification should be provided.	<p>Details on the traffic assumptions and methodology are provided in the Transport Assessment (<b>application document 7.4</b>). The Transport Assessment is based on guidance set out in:</p> <ul style="list-style-type: none"> <li>• Department for Transport. (2007). Guidance on Transport Assessment. London: HMSO; and</li> <li>• Institute of Environmental Management and Assessments (IEMA). (1993). Guidelines for the Environmental Assessment of Road Traffic.</li> </ul> <p>Based on the short term nature of any potential impacts the assessment adopts a proportionate approach consistent with Transport Analysis Guidance The Transport Appraisal Process (Department for Transport, 2018). The Transport Assessment Scoping Report was issued to the Highways departments at Hampshire and Surrey County Councils in January 2019. No comments have been received at the point of writing the ES.</p>
Spelthorne Borough Council	There are discrepancies throughout the Scoping Report regarding the number of compounds within each Section of the route, this needs to be rectified in the ES.	Approximately 52 temporary compounds would be established along the route of the new pipeline for the storage of pipe, materials, plant and equipment. This issue has been addressed throughout the ES.
Spelthorne Borough Council	The CEMP needs to provide more details of the mitigation measures for noise and vibration effects. A peak particle velocity for night time vibration should be set within the ES to ensure the effects of 24 hour trenchless operations are fully assessed.	Details of mitigation can be found in Chapter 16 Environmental Management and Mitigation. Noise and vibration would be managed by processes and measures laid out in the Construction Environmental Management Plan (CEMP). This would include to adopt Best Practicable Means (BPM) for the control of noise and vibration across the project where practicable. (G102)
Surrey County Council	'Sites of Nature Conservation Interest' should read 'Sites of Nature Conservation Importance'.	This has been addressed throughout the ES.
Surrey County Council	The new NPPF (published in July 2018) should be used in the ES.	The National Policy Statement (NPS) for Energy, was the policy document used for the assessment. The new NPPF has been used where relevant within the ES.
Surrey County Council	The heritage assessment should make reference to the Surrey Archaeological Research framework.	Appendix 9.1 Historic Environment Desk Based Survey incorporates the Surrey Archaeological Research Framework.
Surrey County Council	There are a number of permitted mineral sites that are not accurately reflected in the information provided in the Scoping Report which should be included in the ES.	The information regarding permitted mineral sites has been updated in Chapter 11 Soils and Geology.





Consultee	Key Issues	SLP Project Response
Surrey Heath Borough Council	The ES will need to reference all SANGs within Surrey Heath Borough Council including Windlemere and Clewborough which were not included in the Scoping Report.	An assessment on all relevant Suitable Alternative Natural Greenspace have been included in the HRA Report ( <b>application document 6.5</b> ).
Surrey Heath Borough Council	The assessment should cover the impacts on relation to dust on important ecological receptors.	The dust assessment can be found in Appendix 13.2 Air Quality Technical Note. This includes an assessment on designated sites. Chapter 7 Biodiversity and the HRA Report ( <b>application document 6.5</b> ) also assesses the impacts of dust, where appropriate.
Surrey Heath Borough Council	The ES should give consideration to the potential effects that may arise from displaced vehicle movements as a result of traffic management during the construction phase.	An assessment of displaced traffic movements is provided in the Transport Assessment ( <b>application document 7.4</b> ).
Thames Water	The ES should include information regarding the methodology proposed to minimise groundwater discharge into public sewers.	Chapter 3 Project Description includes details on discharges to public sewers. Appropriate discharge consents would be sought for the discharge of the water to suitable public sewers. If discharge consents cannot be obtained, the used test water would be tankered away and disposed of with a sewerage undertaker. The contractor(s) would comply with all relevant consent conditions or DCO provisions regarding de-watering and other discharge activities. This would particularly be with regard to volumes and discharge rates and would include discharges to land, waterbodies or third-party drains/sewers. (G128)
Transport for London	The EIA should assess the impacts to sub surface rail infrastructure including the Piccadilly Line and Elizabeth Line (Crossrail), operation of the Transport to London Rail Network or its junction and potential delays to bus services and detail mitigation measures to deal with any negative impacts.	The Transport Assessment has shown that there are no anticipated effects on sub-surface rail infrastructure. An assessment of the impacts on traffic including bus services is provided in Appendix 13.1 Traffic and Transport Technical Note and the Transport Assessment ( <b>application document 7.4</b> ) . There are no significant effects anticipated to the bus services within the Transport for London network.



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