The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Southampton to London Pipeline Project

Case Reference: EN070005

Adopted by the Planning Inspectorate (on behalf of the Secretary of State for Housing, Communities and Local Government) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

September 2018

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1. INTRODUCTION

1.1 Background

1.1.1 On 26 July 2018, the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) received a scoping request from Esso Petroleum Company, Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Southampton to London Pipeline Project (the Proposed Development).

1.1.2 In accordance with Regulation 10 of the EIA Regulations, an Applicant may ask the SoS to state in writing its opinion *'as to the scope, and level of detail, of the information to be provided in the environmental statement'.*

1.1.3 This document is the Scoping Opinion (the Opinion) provided by the Inspectorate on behalf of the SoS in respect of the Proposed Development. It is made on the basis of the information provided in the Applicant's report entitled Southampton to London Pipeline Project Scoping Report (the Scoping Report). This Opinion can only reflect the proposals as currently described by the Applicant. The Opinion should be read in conjunction with the Applicant's Scoping Report.

1.1.4 The Applicant has notified the SoS under Regulation 8(1)(b) of the EIA Regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development. Therefore, in accordance with Regulation 6(2)(a) of the EIA Regulations, the Proposed Development is EIA development.

1.1.5 Regulation 10(9) of the EIA Regulations requires that before adopting a scoping opinion the Inspectorate must take into account:

(a) any information provided about the proposed development;

(b) the specific characteristics of the development;

(c) the likely significant effects of the development on the environment; and

(d) in the case of a subsequent application, the environmental statement submitted with the original application.

1.1.6 This Opinion has taken into account the requirements of the EIA Regulations as well as current best practice towards preparation of an ES.

1.1.7 The Inspectorate has consulted on the Applicant's Scoping Report and the responses received from the consultation bodies have been taken into account in adopting this Opinion (see Appendix 2).

1.1.8 The points addressed by the Applicant in the Scoping Report have been carefully considered and use has been made of professional judgement and experience in order to adopt this Opinion. It should be noted that

when it comes to consider the ES, the Inspectorate will take account of relevant legislation and guidelines. The Inspectorate will not be precluded from requiring additional information if it is considered necessary in connection with the ES submitted with the application for a Development Consent Order (DCO).

1.1.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

1.1.10 Regulation 10(3) of the EIA Regulations states that a request for a scoping opinion must include:

(a) a plan sufficient to identify the land;

(b) a description of the proposed development, including its location and technical capacity;

(c) an explanation of the likely significant effects of the development on the environment; and

(d) such other information or representations as the person making the request may wish to provide or make.

1.1.11 The Inspectorate considers that this has been provided in the Applicant's Scoping Report. The Inspectorate is satisfied that the Scoping Report encompasses the relevant aspects identified in the EIA Regulations.

1.1.12 In accordance with Regulation 14(3)(a), where a scoping opinion has been issued in accordance with Regulation 10 an ES accompanying an application for an order granting development consent should be based on *'the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion)'*.

1.1.13 The Inspectorate notes the potential need to carry out an assessment under The Conservation of Habitats and Species Regulations 2017. This assessment must be co-ordinated with the EIA in accordance with Regulation 26 of the EIA Regulations. The Applicant's ES should therefore be co-ordinated with any assessment made under the Habitats Regulations.

1.2 The Planning Inspectorate's Consultation

1.2.1 In accordance with Regulation 10(6) of the EIA Regulations the Inspectorate has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by the Inspectorate is provided at Appendix 1. The consultation bodies have

been notified under Regulation 11(1)(a) of the duty imposed on them by Regulation 11(3) of the EIA Regulations to make information available to the Applicant relevant to the preparation of the ES. The Applicant should note that whilst the list can inform their consultation, it should not be relied upon for that purpose.

1.2.2 The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in preparing their ES.

1.2.3 The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.

1.2.4 Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the Applicant and will be made available on the Inspectorate's website. The Applicant should also give due consideration to those comments in preparing their ES.

1.3 Article 50 of the Treaty on European Union

1.3.1 On 23 June 2016, the United Kingdom (UK) held a referendum and voted to leave the European Union (EU). On 29 March 2017 the Prime Minister triggered Article 50 of the Treaty on European Union, which commenced a two year period of negotiations regarding the UK's exit from the EU. On 26 June 2018 The European Union (Withdrawal) Act 2018 received Royal Assent and work to prepare the UK statute book for Brexit has begun. The European Union (Withdrawal) Act 2018 will make sure that UK laws continue to operate following the UK's exit. There is no immediate change to legislation or policy affecting national infrastructure. Relevant EU Directives have been transposed into UK law and those are unchanged until amended by Parliament.

2. THE PROPOSED DEVELOPMENT

2.1 Introduction

2.1.1 The following is a summary of the information on the Proposed Development and its site and surroundings prepared by the Applicant and included in their Scoping Report. The information has not been verified and it has been assumed that the information provided reflects the existing knowledge of the Proposed Development and the potential receptors/ resources.

2.2 Description of the Proposed Development

2.2.1 The Applicant's description of the Proposed Development, its location and technical capacity (where relevant) is provided in Chapter 3 of the Scoping Report.

2.2.2 The Proposed Development involves the installation of an aviation fuel pipeline between Boorley Green and the West London Terminal storage facility in Hounslow. An overview of the route is provided as Figure 3.1 to the Scoping Report. The pipeline would have an internal diameter of about 30cm (12 inches) and would be 90km (56 miles) in length. The pipeline would be buried below ground at a minimum depth of 1.2 metres below the surface.

2.2.3 Other permanent infrastructure required for the Proposed Development include: a new pigging station at Boorley Green; an upgrade to the existing pigging station at the West London Terminal storage facility; pipeline markers; approximately ten remotely operated valves to be installed in sub-surface chambers; and a Cathodic Protection (CP) system. The latter would be predominantly buried underground with the exception of approximately six CP transformer rectifier cabinets, each of which would be located within an above ground cabinet. Temporary infrastructure would include: a main pipe storage compound located at the Alton Pumping Station; temporary construction compounds along the route of the pipeline; and temporary access tracks.

2.2.4 The Proposed Development intends to replace an existing aviation fuel pipeline owned by the Applicant, which runs from its Fawley Refinery near Southampton to its West London Terminal storage facility in Hounslow, a total distance of 105km. In 2002, the Applicant replaced 10km (6 miles) of pipeline between Hamble and Boorley Green in Hampshire. The Proposed Development would therefore replace the remaining 90km of existing pipeline.

2.2.5 The route of the Proposed Development starts at Boorley Green in Hampshire and runs in a predominantly north-eastern direction. It crosses the South Downs National Park and passes through the counties of Hampshire and Surrey before terminating at the West London Terminal storage facility in the London Borough of Hounslow. The proposed route is shown on Figures 3.1 and 3.2 of the Scoping Report.

2.2.6 The existing land uses within and crossed by the Proposed Development include: agricultural land; rural and urban areas; Ministry of Defence (MoD) land; major and minor roads; watercourses including major rivers, brooks and canals; designated sites; golf courses; and racecourses. Table 3.1 of the Scoping Report provides a brief overview of the characteristics within each area of the Proposed Development.

2.3 The Planning Inspectorate's Comments

Description of the Proposed Development

2.3.1 The ES should include a description of the Proposed Development comprising at least the information on the site, design, size and other relevant features of the development. The ES should also include a description of the development and description of the physical characteristics of the whole development, including any requisite demolition works (if required) and the land-use requirements during construction and operation phases. The Inspectorate notes the statement at paragraph 12.4.2 of the Scoping Report that the Proposed Development is unlikely to require the demolition of any residential property, but that effects on residential receptors may include removal of a separate ancillary structure such as a garage or shed. The ES should include a description of any proposed demolition works, where relevant.

2.3.2 The Scoping Report identifies that crossings of watercourses will be predominantly open cut, although the Inspectorate notes paragraph 3.6.21 which states that individual crossings of watercourses will be assessed for their suitability as open cut or trenchless crossings. The ES should clearly identify the proposed crossing methodology for all relevant constraints (e.g. watercourses, roads and railways) and ensure the proposed method is assessed. The ES should include appropriate drawings and figures to identify the types of crossings and their location.

2.3.3 The ES should ensure it describes the construction activities and likely types of construction plant/ machinery in sufficient detail to ensure adequate assessment of any likely significant effects. The ES should identify whether the construction plant/ machinery would include tall structures, such as cranes for the pipeline installation, and assess any likely significant effects as appropriate. The Inspectorate notes that the Proposed Development is located within an aerodrome safeguarding zone and has the potential to affect activities at Royal Air Force (RAF) Odiham and RAF Northolt. The Applicant's attention is directed to the comments of the Ministry of Defence (MoD) at Appendix 2 of the Opinion in this regard.

2.3.4 Inspection and maintenance activities for the operational Proposed Development are briefly listed at paragraph 3.9.1 of the Scoping Report; however, the level of detail is sparse. The Inspectorate notes the reference to management of waste at pigging stations during operation in Chapter 8 of the Scoping Report. The ES should describe in detail the likely operation and maintenance activities for the Proposed

Development, and include an assessment of impacts associated with any operational and maintenance activities that have the potential to result in likely significant effects.

2.3.5 The Scoping Report proposes to scope out decommissioning of the Proposed Development. The justification given is that decommissioning would take place far into the future and there is uncertainty regarding the decommissioning process and the likely regulatory framework at that point. The Inspectorate agrees that decommissioning can be scoped out of the assessment on the basis that decommissioning of the Proposed Development is unlikely to occur in the foreseeable future.

Alternatives

2.3.6 The EIA Regulations require that the Applicant provide 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'.

2.3.7 The Inspectorate acknowledges the Applicant's intention to consider alternatives within the ES and welcomes the intention to include this information in a discrete ES chapter entitled 'Design Evolution', as identified in Chapter 4 and paragraph 17.2.3 of the Scoping Report. The ES chapter should provide details of the reasonable alternatives studied and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.

Flexibility

2.3.8 As noted at paragraph 2.3.1 of the Opinion above, there are several elements of the Proposed Development that have yet to be finalised. The Scoping Report describes that it presents a route for the Proposed Development within a preferred corridor alignment. Paragraph 3.1.18 states that the pipeline route and associated Order Limits will be further refined for inclusion in the application for development consent. However, the Scoping Report does not make clear whether the DCO application would present a fixed and final route for the pipeline and associated elements, or whether the Applicant intends to apply for flexibility to address areas of uncertainty.

2.3.9 The Applicant's attention is drawn to the Inspectorate's Advice Note Nine 'Using the 'Rochdale Envelope'[1], which provides details on the recommended approach to follow when incorporating flexibility into a draft DCO (dDCO).

[1] Advice Note Nine: Using the Rochdale Envelope. 2018. Available at: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

2.3.10 The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The development parameters will need to be clearly defined in the dDCO and in the accompanying ES. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.

3. ES APPROACH

3.1 Introduction

3.1.1 This section contains the Inspectorate's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. General advice on the presentation of an ES is provided in the Inspectorate's Advice Note Seven 'Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements'[2] and associated appendices.

3.1.2 Aspects/ matters (as defined in Advice Note Seven) are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by the Inspectorate. The ES should be based on the Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report.

3.1.3 The Inspectorate has set out in this Opinion where it has/ has not agreed to scope out certain aspects/ matters on the basis of the information available at this time. The Inspectorate is content that the receipt of a scoping opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects/ matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/ matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

3.1.4 Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured through DCO requirements (or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

3.2 Relevant National Policy Statements (NPSs)

3.2.1 Sector-specific NPSs are produced by the relevant Government Departments and set out national policy for NSIPs. They provide the framework within which the Examining Authority (ExA) will make their recommendation to the SoS and include the Government's objectives for the development of NSIPs. The NPSs may include environmental requirements for NSIPs, which Applicants should address within their ES.

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[2] Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements and annex. Available from: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

3.2.2 The Scoping Report contends that the designated NPSs relevant to the Proposed Development are the Overarching NPS for Energy (NPS EN-1) and the NPS for Gas Supply Infrastructure and Gas and Oil Pipelines (NPS EN-4).

3.3 Scope of Assessment

General

3.3.1 The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables:

- to demonstrate how the assessment has taken account of this Opinion;
- to identify and collate the residual effects after mitigation for each of the aspect chapters, including the relevant interrelationships and cumulative effects;
- to set out the proposed mitigation and/ or monitoring measures including cross-reference to the means of securing such measures (eg a dDCO requirement);
- to describe any remedial measures that are identified as being necessary following monitoring; and
- to identify where details are contained in the Habitats Regulations Assessment (HRA report), such as descriptions of European sites and their locations, the results of consultation, and any mitigation or compensation measures, are to be found in the ES.

3.3.2 The Scoping Report includes a number of technical reports for aspects that will be appended to the ES. The Inspectorate considers that these aspects are relevant to the assessment of effects and must be included in ES.

3.3.3 The Scoping Report contains a number of inaccuracies between the main body text and the summary tables. In addition, within the text the Scoping Report describes the intention for further assessment of a variety of environmental matters (eg further desk study or survey information); however, a number of these are then stated as proposed to be scoped out of the ES. The ES must clearly set out the scope of matters assessed within it. Further comments are provided in Section 4 of this Opinion in relation to specific environmental aspects.

Baseline Scenario

3.3.4 The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

3.3.5 The Inspectorate notes that the Proposed Development is of considerable length and consequently there are likely to be number of other relevant

developments in the vicinity. The ES should clearly state which developments will be assumed to be under construction or operational as part of the future baseline.

Forecasting Methods or Evidence

3.3.6 The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter. When describing impacts and resulting effects, terms such as 'temporary', 'short term' etc should be given definition in the ES. Temporary impacts should be considered in the context of the receptors affected.

3.3.7 The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters.

3.3.8 The Scoping Report inconsistently describes the proposed approach to determining significance of effects and the role of mitigation. Paragraph 6.1.4 of the Scoping Report states that "*the magnitude of assessment takes into consideration all embedded mitigation, good practice and measures included in the Code of Construction Practice (CoCP), the likely duration of the impact and how easily or quickly the change would be reversed.*" However, paragraph 6.2.1 of the Scoping Report states that "*after initial consideration of the effects of the Project and their potential significance, consideration will be given as to how those effects could be avoided, reduced or remedied. This is known as mitigation.*" The ES should clearly explain the methods used to determine significance and describe any mitigation relied upon in the assessment. Further comment on mitigation is provided from paragraph 3.3.14 of the Opinion below.

3.3.9 The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

Residues and Emissions

3.3.10 The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.

Mitigation

3.3.11 The Scoping Report seeks to rely on mitigation measures to be provided within an outline Code of Construction Practice (CoCP) (Appendix 1 of the Scoping Report). The outline CoCP will be be taken forward along with a Register of Environmental Actions and Commitments (REAC) into the Construction Environmental Management Plan (CEMP) for the Proposed Development. The Applicant is seeking to scope out a number of matters from the ES based on delivery of these measures and relies considerably on the actions of a yet to be appointed 'competent contractor'. The Inspectorate does not consider that the outline CoCP and other information presented in the Scoping Report are sufficiently detailed to support scoping out the matters requested. The lack of detail associated at this stage affects the Applicant's justification used to support scoping out these matters. Accordingly the Inspectorate does not agree to scope out the matters identified in the Scoping Report on this basis. Further detail on specific aspect matters is provided in Section 4 of this Opinion.

3.3.12 Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, with reference to specific DCO requirements or other legally binding agreements.

Risks of Major Accidents and/ or Disasters

3.3.13 The ES should include a description and assessment (where relevant) of the likely significant effects resulting from accidents and disasters applicable to the Proposed Development. The Applicant should make use of appropriate guidance (e.g. that referenced in the Health and Safety Executives (HSE) Annex to Advice Note Eleven) to better understand the likelihood of an occurrence and the Proposed Development's susceptibility to potential major accidents and hazards. The description and assessment should consider the vulnerability of the Proposed Development to a potential accident or disaster and also the Proposed Development's potential to cause an accident or disaster. The assessment should specifically assess significant effects resulting from the risks to human health, cultural heritage or the environment. Any measures that will be employed to prevent and control significant effects should be presented in the ES.

3.3.14 Relevant information available and obtained through risk assessments pursuant to European Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

Climate and Climate Change

3.3.15 The Inspectorate notes the intention described in paragraph 1.5.22 to include an assessment in the ES to "*set out the likely impacts on climate change of the project, during construction, and the resilience of the project to climate change.*" It is not clear from the Scoping Report where this information would be contained, other than within Chapter 8: Water in respect of the influence of climate change on the Proposed Development through the water environment, as stated at paragraph 1.5.23 of the Scoping Report. The ES should make clear where assessments of effects on climate have been presented and explain what information has been used to determine the assessment e.g. relevant climate change scenarios.

3.3.16 The ES should include a description and assessment (where relevant) of the likely significant effects the Proposed Development has on climate (for example having regard to the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change. Where relevant, the ES should describe and assess the adaptive capacity that has been incorporated into the design of the Proposed Development. This may include, for example, alternative measures such as changes in the use of materials or construction and design techniques that will be more resilient to risks from climate change.

Transboundary Effects

3.3.17 Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES.

3.3.18 The Scoping Report concludes at paragraph 1.5.17 that the Proposed Development is not likely to have significant effects on another European Economic Area (EEA) State and proposes that transboundary effects do not need to be considered within the ES. The Inspectorate notes the Applicant's conclusion in the Scoping Report; however, recommends that, for the avoidance of doubt, the ES details and justifies this conclusion.

A Reference List

3.3.19 A reference list detailing the sources used for the descriptions and assessments must be included in the ES.

3.3.20 It is noted that in several places within the Scoping Report that references in the text to bibliography documents are ambiguous. In the interests of clarity, the ES must ensure specific and accurate referencing to documents used in its compilation.

3.4 Confidential Information

3.4.1 In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to information about the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial

exploitation may result from publication of the information. Where documents are intended to remain confidential the Applicant should provide these as separate paper and electronic documents with their confidential nature clearly indicated in the title, and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2014.

4. ASPECT BASED SCOPING TABLES

4.1 Biodiversity

(Scoping Report Volume 1, Chapter 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.1.1	Paragraphs 7.4.17, 7.4.18 and 7.4.19	Mortality/injury arising from collision with machinery during construction	On the basis of the low number machinery/vehicles proposed to be moving through the route during construction at any one time, the Inspectorate agrees that this is unlikely to give rise to significant effects and can be scoped out of the ES. The Inspectorate notes the intention to assess mortality/ injury to species during construction arising from other activities, such as those identified in paragraph 7.4.16, including topsoil stripping.
4.1.2	Paragraph 7.4.18	Mortality/injury during operation	The Inspectorate agrees that this potential effect can be scoped out of the impact assessment given the absence of a potential effect pathway.
4.1.3	Paragraph 7.4.25	Habitat loss during operation	The Inspectorate agrees that this matter can be scoped out of the impact assessment as significant effects from habitat loss during operation are not likely to occur.
4.1.4	Paragraph 7.4.29	Lighting effects	The Scoping Report inconsistently addresses the approach to scoping in/ out of lighting effects. The Scoping Report does not provide sufficiently detailed information including the likely value and likely location of relevant ecological receptors. The Scoping Report also does not provide sufficient detail in in regards to good practice measures referred to in order to control such effects. The Inspectorate does not agree that effects to sensitive ecological receptors from lighting can be scoped out of the impact assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The ES should include an assessment of likely significant effects to relevant ecological receptors from lighting during relevant stages of the Proposed Development. The ES should also describe any proposed mitigation relied upon and the anticipated efficacy of the mitigation, before concluding on residual effects.
4.1.5	Paragraph 7.4.31	Species disturbance arising from changes to noise, vibration or visual stimuli during operation	As noted in Table 4.11 of the Opinion below, the Inspectorate agrees that effects of noise and vibration as a result of the flow of fuel in the pipeline and the operation of valves, can be scoped out of the ES on the basis of low likelihood of significant effects (as described in Appendix 8.3 of the Scoping Report). However, the Scoping Report does not provide a description of the likely works to upgrade and modernise the existing pumping station at Alton, including any anticipated noise, vibration or lighting. It also does not provide detailed information on the likely noise and vibration characteristics at the new pigging station at Boorley Green. Therefore, the Inspectorate considers that the ES should clearly describe the proposed operational development and assess impacts on relevant species receptors as a result of changes to noise, vibration and lighting, from the operational development, where significant effects are likely to occur.
4.1.6	Table 7.5 and Paragraphs 7.4.33 to 7.4.36	Effects associated with air quality changes during construction	The Scoping Report inconsistently addresses effects from changes in air quality. The Scoping Report concludes that "*good practice mitigation measures outlined in Chapter 4, and to be secured through the CoCP, would be sufficient to prevent or reduce changes in air quality during construction as a result of dust deposition.*" and that "*road traffic flows would not exceed those at which a significant effect could arise to important ecological receptors.*" However the Scoping Report also identifies a potential impact pathway on a number of ecological receptors associated with changes to air quality during construction. Having had regard to the information contained in the Scoping Report

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			the Inspectorate does not agree that effects associated with changes to air quality during construction can be scoped out. The Scoping Report does not provide information regarding the location and value of all sensitive ecological receptors that could be within or adjacent to the Proposed Development route and therefore potentially affected by changes in dust deposition. The Scoping Report also lacks information on the anticipated traffic flows and locations, displaced traffic effects, and cumulative effects, particularly in the vicinity of sensitive receptors such as the Thames Basin Heaths SPAs during construction. The ES should assess effects from changes in air quality to relevant ecological receptors during construction, where significant effects are likely. The mitigation relied upon in the assessment should be specified in the ES and appropriately secured.
4.1.7	Paragraphs 7.4.33 to 7.4.36	Effects associated with air quality changes during operation	The Inspectorate agrees on the basis of the information provided and the characteristics of the operational development that air quality change effects on ecological receptors during operation can be scoped out of the ES.
4.1.8	Paragraph 7.4.39	Operational effects to watercourses	The Scoping Report proposes to scope in operational effects on surface watercourses arising from management works at pigging stations. The Inspectorate also considers that an assessment of likely significant effects to the fluvial geomorphology of watercourses should also be included in the ES (see point 4.2.11 of the Opinion below). The ES should therefore describe and assess any likely significant ecological effects on watercourses arising from the operation of the Proposed Development, where sensitive ecological receptors are identified and could be affected by impacts to the fluvial geoorphology of watercourses.
4.1.9	Paragraphs 7.4.40 to	The introduction or spread of invasive non-native species (INNS)	The Inspectorate does not agree to scope out the assessment of INNS during construction. The Scoping Report has not confirmed the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	7.4.44	during construction	presence/ absence or abundance of INNS and it is therefore uncertain whether measures proposed within the Scoping Report would be sufficient to avoid a likely significant effect. Appendix 3 of the Scoping Report proposes survey work for both botany and habitats and watercourses. The Inspectorate considers that these surveys should also include incidental recording of any INNS and identify the potential for any INNS to be disturbed by the Proposed Development. Where necessary the surveys should inform an assessment of impacts arising from their presence, where significant effects are likely.
4.1.10	Paragraphs 7.4.43 to 7.4.44	The introduction or spread of INNS during operation	The Inspectorate agrees that during operation there is unlikely to be significant effects associated with the introduction and/ or spread of INNS during operation. Accordingly this matter can be scoped out of the ES.
4.1.11	Paragraphs 7.4.9 and 7.4.55	Statutory designated sites – Effects on Basingstoke Canal Site of Special Scientific Interest (SSSI)	The Scoping Report proposes to scope out this matter on the basis that this waterbody would be crossed using trenchless methods. The Scoping Report does not provide information such as the proximity of the proposed works adjacent to the SSSI. In absence of this information it is unclear whether there is a potential impact pathway to the SSSI and its qualifying features from the Proposed Development. Where impact pathways from the Proposed Development to the SSSI exist and where a likely significant effect may occur this should be assessed in the ES. Any mitigation and/ or design measures relied upon to exclude likely significant effects on this SSSI should be explained in the ES and appropriately secured.
4.1.12	Paragraph 7.4.50	Statutory designated sites – Habitat loss/ gain, fragmentation, or modification of all designated sites outside of the Order limits	With the exception of potential significant effects arising from air quality (including dust) and hydrological changes on designated sites beyond the Order Limits (see also point 4.1.6 above), the Inspectorate agrees that having had regard to the characteristics of the Proposed Development impacts associated with habitat loss/ gain,

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		(excluding hydrological impacts)	fragmentation or modification on these designated sites (excluding air quality and hydrological impacts) is unlikely to result in significant effects.
4.1.13	Paragraph 7.4.54	Statutory designated sites – Effects on the following designated sites as a result of hydrological change: • Solent and Southampton Water Special Protection Area (SPA); • Solent Maritime Special Area of Conservation (SAC); • Solent and Southampton Water Ramsar; and • Upper Hamble Estuary and Woods SSSI.	The Scoping Report identifies a potential for hydrological impacts on these sites but does not clearly describe the embedded and good practice measures to be relied upon. There is also a lack of clarity regarding when such measures would be applied. The Inspectorate does not agree to scope out an assessment of effects of hydrological change to these designated sites from the ES. The ES should describe and assess hydrological change on these sites, where significant effects are likely to occur. If mitigation measures are relied upon to support the conclusion of no likely significant effects they should be described within the ES and appropriately secured.
4.1.14	Paragraph 7.4.57	Statutory designated sites – Effects of hydrological change on all other statutory designated sites (this excludes designated sites listed in paragraph 7.4.56 of the Scoping Report and those in point 4.1.13 above)	The ES should describe and assess hydrological change on these sites, where significant effects are likely to occur.
4.1.15	Paragraph 7.4.68	Non-statutory designated sites – Habitat loss/ gain, fragmentation or modification effects on Maddoxford Farm Meadows Site of Importance to Nature Conservation (SINC) and River Thames Site of Nature	The Inspectorate notes the current proposal to use trenchless construction techniques under these two non-statutory sites; however, this is not yet confirmed. Where impact pathways from the Proposed Development to these sites exist and where a likely significant effect may occur, this should be assessed in the ES. Any mitigation and/ or design measures relied upon to exclude likely

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		Conservation Interest (SNCI)	significant effects on these sites should be explained in the ES and appropriately secured.
4.1.16	Paragraphs 7.4.69 and 7.3.22	Non-statutory designated sites – Habitat loss/ gain, fragmentation or modification effects on all non-statutory designated wildlife sites not listed in paragraph 7.4.66	The Inspectorate does not consider that there is detailed information to agree to scope these matters out of assessment in the ES at this stage. The Scoping Report does not include information to identify all non-statutory sites within the Proposed Development (eg sites in Surrey). The ES should identify, value and assess non-designated sites, where significant effects as a result of habitat loss/ gain, fragmentation or modification are likely to occur.
4.1.17	Paragraph 7.4.75	Effects on Ancient Woodland	It is unclear whether the ES will rely solely on Natural England's Ancient Woodland Inventory to identify ancient woodland affected by the Proposed Development. Ancient woodlands smaller than 2 hectares (ha) are unlikely to appear on these inventories. The ES should assess likely significant effects on all ancient woodland where significant effects are likely to occur. As noted in point 4.1.6 of the Opinion above, the assessment should consider effects associated with air quality changes (such as dust deposition) on ancient woodland where significant effects are likely. The assessment should include details of the proposed mitigation, together with how this is to be appropriately secured.
4.1.18	Paragraphs 7.4.79 to 7.4.80	Wintershill coastal and floodplain grazing marsh priority habitat – Effects of habitat loss/ gain, fragmentation or modification	The Inspectorate notes that ecological value and water dependency of the coastal and floodplain grazing marsh priority habitat at Wintershill as presented in the Scoping Report is currently based on a desk-based assessment. The Inspectorate also notes the footnote at Table 8.2 of the Scoping Report which indicates that further assessment based on site walkovers will be made of this site which could alter the assessment of water dependency and thus its potential value. Given the current uncertainty of the value and water dependency of the habitat at Wintershill, the Inspectorate considers that the ES should

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			confirm the value and assess effects on this priority habitat, where significant effects are likely.
4.1.19	Paragraph 7.4.81	Eutrophic standing water priority habitat – Effects of habitat loss/ gain, fragmentation or modification	The Scoping Report does not identify hydrological impacts to this priority habitat type at the two locations identified – Basingstoke Canal and the Staines Reservoir Aqueduct – due to the proposed trenchless crossings in this location. The Inspectorate has commented on the Basingstoke Canal SSSI above at point 4.1.11 of the Opinion. The Scoping Report provides limited information with regards to the location of the proposed trenchless crossings, potential impact pathways and the likely ecological value associated with the Staines Reservoir Aqueduct. Where impact pathways from the Proposed Development to sensitive ecological features at Staines Reservoir Aqueduct and/or priority habitat exist and where a likely significant effect may occur, this should be assessed in the ES.
4.1.20	Paragraphs 7.4.82 to 7.4.83	Hedgerows – Effects of habitat loss/ gain, fragmentation or modification	The Scoping Report proposes to scope out effects on hedgerows on the basis of embedded mitigation to select the alignment and limit the amount of hedgerow to be removed, together with measures to enhance hedgerows. The Scoping Report does not define how many hedgerows would be affected along the length of the Proposed Development or the value of these hedgerows. Given the scale and nature of the Proposed Development and the absence of information with regards to hedgerows, the Inspectorate considers that effects on hedgerows cannot be scoped out of the ES at this stage. The ES should identify and value the amount of hedgerow to be affected by the Proposed Development. The assessment of effects should characterise the extent, duration, reversibility, frequency and timing. The Scoping Report intimates that a net gain is anticipated. In order to demonstrate net gains, the ES should include calculations of hedgerow loses versus gains.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.1.21	Paragraphs 7.4.84 to7.4.90	Effects on priority habitats, including: • Lowland calcareous grassland • Lowland dry acid grassland • Lowland meadows • Lowland mixed deciduous woodland • Wet woodland	The Inspectorate does not believe it is appropriate to scope these matters out of the ES, not least because the Scoping Report does not confirm whether these priority habitats are present or absent from the zone of influence, beyond those located within designated sites. The Inspectorate also notes at Appendix 3 to the Scoping Report that a number of botany and habitat surveys are proposed for 2018 and considers that these have the potential to amend the conclusions concerning priority habitats currently presented in the Scoping Report. The Inspectorate considers that the ES should identify, value, and assess effects on priority habitats should they be found to be present in subsequent surveys and where significant effects are likely.
4.1.22	Paragraphs 7.4.110 to 7.4.118	Bats – foraging/ commuting habitat loss and fragmentation	Paragraph 7.4.118 indicates that effects of foraging/ commuting habitat loss and fragmentation on bats would be negligible and should therefore be scoped out of the ES. The Scoping Report includes an intention at Appendix 3 to undertake further surveys and assessment for bats in order to determine the presence of bat roosts. The Inspectorate considers that this information will be a valuable indicator as to the need for more detailed assessment of valuable foraging/commuting habitat. In the absence of the survey information, the Inspectorate does not consider that there is enough information to agree with scoping out impacts to foraging/ commuting habitat and fragmentation. The ES should assess these matters where significant effects are likely to occur and should be informed by relevant survey information.
4.1.23	Paragraphs 7.4.137 to 7.4.140	Badgers	The Inspectorate agrees that effects on badgers can be scoped out of the ES on the basis of their conservation status and the population in the local area. The Inspectorate notes and welcomes the intention to include a Protected Species and Legally Controlled Species Compliance Report to be appended to the ES, which is to address matters

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			associated with the legal protection afforded to badgers.
4.1.24	Paragraphs 7.4.157 to 7.4.160; 7.4.161 to 7.4.164; and 7.4.165 to 7.4.172 Table 7.3	Breeding birds – mortality and injury; habitat loss/ gain, fragmentation or modification and disturbance	The Inspectorate notes that the statement that numerous records of notable bird species were provided through the desk study; however, the Scoping Opinion does not provide details confirming the species identified. Targeted bird surveys have not been proposed, although pre-construction surveys for any Schedule 1 birds are identified. The Scoping Report states that breeding birds outside of designated sites are considered to be of "low" ecological value. The Scoping Report states that good practice mitigation would be implemented wherever possible to reduce impacts of mortality/injury to negligible, and due to the abundance of habitats in the wider area and largely temporary nature of the works, effects of habitat loss/gain, fragmentation or modification and disturbance are scoped out. Despite the availability of good practice mitigation, the Scoping Report does not provide the information to justify the value of breeding birds outside of designated sites and therefore, the impacts are not fully understood and the Inspectorate cannot agree to scope out effects on breeding birds. The ES should be informed by relevant survey information necessary to inform the value of breeding birds outside of designated sites, where significant effects are likely. Mitigation relied upon in the assessment should be specified in the ES and appropriately secured.
4.1.25	Paragraphs 7.4.179 to 7.4.181, and 7.4.188	Common and rare reptiles – habitat loss/ gain, fragmentation or modification	The Scoping Report does not quantify the amount of valuable reptile habitat that would be lost or the abundance of such habitat for local populations. In absence of this information the Inspectorate does not consider there is detailed information to determine that this matter can be scoped out of the ES. The ES should assess the impacts to the reptile species/populations identified through desk study, habitat

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			assessment and the further surveys proposed, where significant effects are likely to occur. Mitigation relied upon in the assessment should be specified in the ES and appropriately secured.
4.1.26	Paragraphs 7.4.194 to 7.4.196, 7.4.200 to 7.4.202, and Table 7.3 Appendix 3	Fish and other aquatic species – mortality and injury and disturbance	The Inspectorate does not agree that effects on fish and other aquatic species can be scoped out. The Scoping Report does not contain detailed information with regards to the likely presence, value and location of important fish and other aquatic receptors that could be affected by the Proposed Development. Chapter 7 and Appendix 3 of the Scoping Report also acknowledge that desk-based data and field sampling in respect of fish has yet to be obtained. The Inspectorate also does not have detailed information with regards to the mitigation measures nor the certainty that the proposed mitigation would be delivered (such as timing of works, lighting/ noise/ vibration changes). The summary of the method to be applied when installing the pipeline in open cut watercourses in Chapter 3, for example, does not include reference to measures to protect fish species from entrainment, where necessary. The ES should assess impacts from mortality/ injury and disturbance to important fish and other aquatic species, where significant effects are likely to occur. Mitigation relied upon in the assessment should be specified in the ES and appropriately secured.
4.1.27	Paragraphs 7.4.206 to 7.4.215	Other notable species (including brown hare, polecat, hedgehog, harvest mouse, yellow-necked mouse, pygmy shrew, water shrew, and invertebrates)	The Inspectorate agrees on the basis of the characteristics of the Proposed Development and the largely temporary nature of the vegetation removal which could affect other notable species identified, together with proposed mitigation measures to prevent killing/injuring, that effects on other notable species can be scoped out of the ES.

ID	Ref	Other points	Inspectorate's comments
4.1.28	Paragraphs 7.3.23 and 7.3.25	Biodiversity Opportunity Areas (BOAs)	The Inspectorate notes that the Scoping Report identifies BOAs as being of negligible value for biodiversity. In compiling the ES, the Applicant should consider whether there would be any likely significant effects on BOAs as management areas to improve ecological connectivity.
4.1.29	Table 7.4	Receptors – aquatic invertebrates	Table 7.4 refers to aquatic invertebrates; however, no likely effects have been considered on this group in Section 7.4. It is noted that the Applicant is awaiting data from the Environment Agency (EA). Should it be determined that aquatic invertebrates are found to be a valued/important ecological receptor potentially affected by the Proposed Development, this should be detailed and assessed in the ES, where significant effects are likely to occur. The Biodiversity ES Chapter should also cross-refer to the Water Framework Directive (WFD) assessment, as appropriate.
4.1.30	Paragraphs 7.4.174 to 7.4.178	Reptiles – mortality/injury	The Inspectorate considers that reptile species should also be included in the proposed Protected Species and Legally Controlled Species Compliance Report appended to the ES.
4.1.31	Paragraph 7.4.204	Length of time for working in-channel when using open cut trenching	The Scoping Report refers to a reduced period of time when working in-channel, and cross-refers back to Chapter 4 Design Evolution. The Inspectorate was unable to find reference to the proposed reduced timing of works in Chapter 4. Where this relied upon for the purposes of the impact assessment, timings should be stated in the ES and be appropriately secured.
4.1.32	Table 7.7	Summary table – Statutory designated sites	It is noted that the SSSIs underpinning the Thames Basin Heaths SPA are not identified in this table for disturbance effects. The ES should ensure these SSSIs are also considered.
4.1.33	n/a	Climate change and biodiversity	The ES should consider effects associated with the loss of habitats (including trees and woodlands) on climate change, where significant

ID	Ref	Other points	Inspectorate's comments
			effects are likely to occur.
4.1.34	Appendix 8.3 Noise and Vibration Tables A8.3.6 and A8.3.7	Maximum distances at which significant construction noise effects could occur	These tables identify maximum distances for effects on human receptors only. It is unclear from the Scoping Report how noise effects on ecological receptors will be determined. The ES should clearly explain any assumptions made with regard to the assessment of likely significant impacts arising from noise and vibration on sensitive ecological receptors.

4.2 Water

(Scoping Report Volume 1, Chapter 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.2.1	Paragraph 8.4.4 and Table 8.15	Groundwater: Changes to groundwater recharge rates- during construction	The Inspectorate agrees that this matter can be scoped out of the ES given the very low likelihood of significant effects arising.
4.2.2	Paragraph 8.4.4 and Table 8.15	Groundwater: Interception of shallow groundwater - during construction	The Scoping Report proposes to scope out the interception of shallow groundwater apart from locations where the following constraints occur: • Groundwater Dependant Terrestrial Ecosystems (GWDTE) with local, national or international designations that have a high or moderate groundwater dependency; • In the vicinity of shallow groundwater private water supplies; and • Where the pipeline runs parallel to watercourses which may be fed by shallow groundwater. This is on the basis there is a likely absence of receptors sensitive to such effects (other than those mentioned above) along the majority of the pipeline route and effects would be at a scale that is not likely to be significant. An assessment of effects on the abovementioned sensitive receptors must be included in the ES. The Inspectorate agrees that for all other locations this potential effect can be scoped out of the ES given the likely absence of receptors sensitive to this potential effect and the low likelihood of a significant effect arising.
4.2.3	Paragraph	Groundwater: Interception of	The Scoping Report scopes out an assessment of effects associated

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	8.4.4 and Table 8.15	shallow groundwater in the pipeline trench which could lead to groundwater of poor quality discharging to sensitive receptors in the Groundwater Study Area (GWSA) A,B and C during construction	with poor quality groundwater discharge from the pipeline construction in areas GWSA-A, GWSA-B, and GWSA-C, on the basis that construction works in these areas are unlikely to encounter poor quality groundwater, and thus there is not a pathway to the receptor or, where there is a pathway, it is unlikely to be at a scale where significant effects are likely to occur. Due to the presence of a large number of landfills, the presence of shallow groundwater and the high uncertainty regarding groundwater quality in area GWSA-D, effects in this area are scoped in to the ES. The Inspectorate notes that GWSA-A has the same amount of water monitoring stations as GWSA-D, a mixture of good and poor quality groundwater and also has shallow groundwater. Therefore, the Inspectorate does not agree that this matter can be scoped out for the GWSA-A. The Inspectorate agrees that this matter can be scoped out within GWSA-B and GWSA-C due to the very low likelihood of significant effects occurring.
4.2.4	Paragraph 8.4.4 and Table 8.15	Groundwater: Changes to groundwater quality from migration of dissolved substances during construction (excluding historical contaminated land or landfills)	On the basis that the impact is likely to be on a small scale and unlikely to result in significant effect to groundwater quality, and also that an assessment of historical contaminated land and landfills will be included in the ES, the Inspectorate agrees that this matter can be scoped out of the ES.
4.2.5	Paragraph 8.4.4 and Table 8.15	Groundwater: Changes to groundwater quality from the migration of suspended solids at all locations except for the unconfined Chalk Principal aquifer during construction	The Inspectorate agrees that this potential effect can be scoped out of the impact assessment on the basis that there is unlikely to be a potential effect pathway and where such a pathway occurs, effects are unlikely to be significant.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.2.6	Paragraph 8.4.4 and Table 8.15	Groundwater: Changes to groundwater quality arising from the discharge of silt with groundwater back to the ground during construction	The Scoping Report acknowledges there is a potential impact pathway for silt, but proposes to scope out potential effects to groundwater quality arising from silt discharge on the basis that mitigation measures, such as settlement lagoons or other appropriate treatment, would be applied. Whilst the Inspectorate is aware of mitigation measures to control silt, the measures to be applied are not certain at this stage. Therefore, the Inspectorate expects the ES to include an assessment of impacts from silt discharge and any mitigation measures described and secured, as appropriate.
4.2.7	Paragraph 8.4.4 and Table 8.15	Groundwater: Changes to groundwater quality from leaks and spills from chemicals, fuels and oils used in construction for all locations where trenches do not cross GWDTE during construction	The Inspectorate notes that the justification for scoping out all locations where trenches do not cross GWDTE is "*the mitigation measures that will be used to reduce this impact will be included in the CoCP.*" As the outline CoCP has not stated any specific mitigation measures that would reduce the impact, the Inspectorate cannot agree to scope this matter out of the ES. The Inspectorate would expect to see assessment of impacts from leaks and spills in the ES where significant effects are likely. The ES should also explain any mitigation measures described and secured, as appropriate.
4.2.8	Paragraph 8.4.5 and Table 8.15	Groundwater: Changes to groundwater flow directions or level due to below ground structures for all locations except GWDTE during operation	Paragraph 8.4.5 of the Scoping Report discusses two elements of changes to groundwater flow direction and level due to below ground structures, one with and one without the use of gravel surround for the pipeline. The Scoping Report explains that mitigation in the form of water stops (or "stanks") would be provided such that significant effects on all areas except GWDTE would be scoped out. The Inspectorate agrees that changes to groundwater flow direction or levels on GWDTE must be included in the ES. However, the Inspectorate is content that there is a very low likelihood of significant effects arising in other areas, the Inspectorate agrees that this potential effect can be scoped out of the ES in all other areas.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.2.9	Paragraph 8.4.5 and Table 8.15	Groundwater: Leaks of aviation fuel during operation within Secondary Undifferentiated aquifers and Unproductive strata and confined chalk within all GWSA areas during operation (all other aquifers are scoped in).	The Scoping Report identifies that effects on groundwater quality from potential leaks during the operation of the pipeline are scoped in for most areas, although areas where there is low permeability the effect is scoped out on the basis of an absence of potential effect pathway and the receptor not being sensitive to the matter. The Inspectorate agrees that where there is no potential impact pathway and no receptor sensitive to the effect, this can be scoped out of the ES.
4.2.10	Paragraphs 8.4.11,8.4.14 and Table 8.15	Fluvial geomorphology: Changes to morphological process and features as a result of open cut crossings during construction	The Scoping Report identifies the potential for impacts to the morphological processes and features of watercourses due to watercourse crossings. This is on the basis of works would be temporary and good practice measures to be included in the CoCP. The Scoping Report acknowledges that "*The reinstatement of the channel cross-section and vegetated riparian corridor would be key to ensuring that there are no significant effects following construction.*" The Inspectorate notes that paragraph 8.4.12 appears to scope out the effects of construction at watercourse crossings on geomorphology for watercourses of any value. However, Table 8.15 and paragraph 8.4.14 refer to the scoping out of impacts on low and negligible value watercourses only. Given the number of watercourses to be crossed by the Proposed Development and the potential for significant effects on watercourses arising from the crossing works, the Inspectorate does not agree to scope out this impact. The Scoping Report also does not provide detail in respect of the proposed mitigation measures to provide confidence as to the efficacy of any good practice measures to control effects.
4.2.11	Paragraph 8.4.14 and Table 8.15	Fluvial geomorphology: Changes to morphological processes and features as a result of directionally drilled crossings during	The Scoping Report does not provide information such as the proximity of the proposed works adjacent to watercourses proposed to be crossed using trenchless methods. In the absence of this information it is unclear whether there is a potential impact pathway

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		construction and operation	on the geomorphology of watercourses. Where impact pathways from the Proposed Development exist, and where a likely significant effect may occur, this should be assessed in the ES. Any mitigation and/ or design measures relied upon to exclude likely significant effects on watercourses crossed using trenchless methods should be explained in the ES and appropriately secured.
4.2.12	Paragraph 8.4.15 to 8.4.17 and Table 8.15	Flood risk: Changes to flood risk within very low and low value receptors during construction	The Scoping Report proposed to scope out an assessment of flood risk in the following areas: • areas within the Order Limits characterised as lying within Flood Zone 1; • areas of very low risk from surface water flooding; • outside areas of reservoir flood risk; and • on an aquitard or areas assessed to present no groundwater flood risk. This is on the basis of assumed no flood source and management of surface water by a competent contractor, as communicated through a CEMP for the Proposed Development. The Scoping Report does not provide detail in respect of the proposed mitigation measures to provide confidence as to the efficacy of any mitigation measures to control effects. However, on the basis that there would be a low likelihood of these areas being affected by flood risk, the Inspectorate agrees that the receptors/ areas listed within paragraph 8.4.16 can be scoped out of the flood risk assessment within the ES.
4.2.13	Paragraphs 8.4.18 to 8.4.19	Flood risk: Changes to flood risk in the Order Limits during construction	The Scoping Report proposes to scope out an assessment of flood risk where: • the site lies within Flood Zone 2 and/or the 0.1% to 1% Annual

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Exceedance Probability (AEP) surface water flood extent; • where the depth of flooding in areas with a surface water flood risk of 3.3% annual chance (1 in 30) is less than 300mm; • where areas of surface water flood risk are geographically isolated (i.e. not connected overland); and • areas with a limited potential for groundwater flooding and the risk of flooding from reservoirs results in less than 300mm of flood water. This is on the basis of the flood source being of low sensitivity. The Inspectorate does not agree that the receptors/ areas identified n paragraph 8.4.18 can be scoped out of the ES. The Scoping Report has not provided sufficient evidence to scope out effects arising from construction in Flood Zone 2 areas. An assessment of flood risk in the above areas should be included in the ES, as supported by the proposed Flood Risk Assessment (FRA).
4.2.14	Paragraphs 8.4.28 to 8.4.31	Operational effects on surface waters (excluding operations at pigging stations)	The Inspectorate agrees that the operation of the Proposed Development, with the exception of management works at the pigging stations, can be scoped out of the ES as significant effects are unlikely to occur.
4.2.15	Paragraphs 8.4.32 to 8.4.33 and Table 8.15	Fluvial geomorphology during operation	The Scoping Report lacks clarity with regards to which fluvial geomorphological receptors are proposed to be scoped out of the assessment. There are inconsistencies between Table 8.15, paragraph 8.4.33 and the text box adjacent to paragraph 8.4.33. The Scoping Report also identifies in paragraph 8.4.32 potential impacts on fluvial geomorphology during operation and does not provide sufficient justification as to why these matters are scoped out. Insufficient detail has been provided with regards to proposed maintenance activities

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			which could affect fluvial geomorphology receptors. The ES should include an assessment of impacts to fluvial morphology receptors during operation, where significant effects are likely to occur.
4.2.16	Paragraphs 8.4.34 to 8.4.36 and Table 8.15	Changes to flood risk during operation	The Inspectorate agrees that this matter can be scoped out of the ES given the very low likelihood of changes to flood risk and significant effects arising during operation.

ID	Ref	Other points	Inspectorate's comments
4.2.17	n/a	Location of monitoring stations	The ES should include a table or figure which depicts the location of the monitoring stations used to inform the assessment. This information will aid the reader to understand how the groundwater quality has been established in the area.
4.2.18	Paragraph 8.3.1	Surface water study area	The Scoping Report has not explained why a 500m study area will be used for the assessment of surface water. Within the ES, the study area should be clearly justified and reflect the anticipated extent of potential significant effects.
4.2.19	Paragraph 8.3.14	Location of groundwater abstractions	The appraisal of the groundwater abstraction location data should be included within the ES.
4.2.20	Paragraph 8.3.16	Classification of GWDTE	The Scoping Report has not stated how a GWDTE is determined to be of high, medium or low groundwater dependency. A description of the methodology used to classify the GWDTE as being high, medium or low groundwater dependant should be included within the ES.

ID	Ref	Other points	Inspectorate's comments
4.2.21	Paragraphs 8.3.25 and 8.3.65	Groundwater quality data within the GWSA-A and D	The Scoping Report states that groundwater quality data within GWSA-A and GWSA-D has been obtained from one monitoring station. The Applicant should consult with relevant consultation bodies in effort to agree the sufficiency of baseline information. The baseline assessment in the ES should be sufficiently robust to inform the assessment of groundwater quality across the entire GWSA.
4.2.22	Paragraph 8.3.26, Table 8.2, Figure 8.1 sheet 1 of 4, and Figure 8.8 sheet 1 of 4	Wintershill Floodplain GWDTE	The Scoping Report states that the Ford Lake Valley GWDTE is susceptible to groundwater flooding and is therefore classified as having a "high" groundwater dependency. However, Wintershill Floodplain is also within an area susceptible to groundwater flooding but has been classified as having a "low" groundwater dependency. Care should be taken to ensure that the approach to determining groundwater dependency classification is consistent in the ES.
4.2.23	Paragraph 8.3.78	Pollution Incidents	The Scoping Report list 14 surface water pollution incidents but has not included any other details regarding these events. The ES should state when and where these pollution events occurred in order to inform the baseline information in the assessment.
4.2.24	Paragraph 8.3.79	Fluvial geomorphology and surface water receptors	Reference is made to 94 surface waterbodies at paragraph 8.3.79, including two canals and four lakes. The surface water sub-section from paragraph 8.3.69, which discusses water quality, only refers to rivers and watercourses. The ES should ensure that baseline data adequately describes canal and lake receptors, where they are considered and assessed in the ES.
4.2.25	Table 8.11	Geomorphological receptors	This Scoping Report suggests that Basingstoke Canal is considered to be of negligible value as a geomorphological receptor. However, the Inspectorate notes that low and negligible waterbodies in this table, including Basingstoke Canal, are also identified elsewhere in the Scoping Report for inclusion in the ES (for example for their ecological

ID	Ref	Other points	Inspectorate's comments
			value). The ES should ensure that receptors are valued appropriately and cross-refer to information in other relevant aspect chapters where the same receptor(s) are considered.
4.2.26	Paragraphs 8.3.83 and 8.3.84	Flood Risk Areas	The ES should accurately depict the baseline information. The Inspectorate notes that the Scoping Report states within paragraphs 8.3.83 and 8.3.84 the percentage of land within flood zones. Although it is implied by the figures, the Scoping Report does not specifically address overlaps between flood zone categories.
4.2.27	Paragraph 8.3.84 and Table 8.13	Flood Risk Zone 2	The Scoping Report states that "*Areas in Flood Zone 2 are considered to be of a Low sensitivity*". Table 8.13 also identifies Flood Zone 2 as being a receptor of low sensitivity/ value. The ES should justify why this is considered to be the case.
4.2.28	Paragraph 8.3.89	Flood risk from reservoirs	The Scoping Report states that Section H is at a risk from reservoir flooding but has not stated the level of risk. The ES should include the Section H reservoir flooding risk level.
4.2.29	Paragraph 8.3.94	Flood Risk from sewerage	The Scoping Report states that further investigations into the flood risk from sewerage will be undertaken. The results from this further investigation should be included within the ES.
4.2.30	Paragraph 8.3.97 and ES Appendix 5.1	Surface waterbodies	The Inspectorate notes that the scope of the ES in respect of the surface waterbodies to be assessed refers back to those scoped/screened into the WFD assessment, as presented in Appendix 5.1 WFD Screening and Scoping Assessment. The Inspectorate notes that Table 3.2 does not explain/justify why six surface waterbodies are scoped out of the assessment. The ES should clearly justify the scoping out of surface waterbodies and include appropriate cross-referencing to the WFD assessment, as relevant.
4.2.31	Paragraph	Climate change	For the flood risk assessment, the ES should state which future climate model and flood risk allowance will be used and any

ID	Ref	Other points	Inspectorate's comments
	8.3.103		assumptions and uncertainties within the climate change model. The Applicant should make effort to agree these with relevant consultation bodies. The ES should explain how the assumptions and uncertainties have informed the climate change baseline and risk assessment. As set out in the NPS EN-1 (Paragraph 4.8.6) the Applicant should take into account the potential impacts of climate change using the latest UK Climate Projections (UKCP), this should include the anticipated UKCP18 projections where appropriate. The climate change model and future flood risk allowance baseline should be agreed with the relevant statutory body.
4.2.32	Paragraphs 8.4.11 to 8.4.14	Temporary and permanent duration	The Inspectorate notes the statement at paragraph 8.4.13 that "*haul roads and access tracks are likely to be considered as permanent for the purposes of the assessment as they could be in place for more than one month.*" The Scoping Report also describes that works associated with watercourse crossings would be of a "*temporary nature*". The Applicant should ensure that duration of effects are clearly stated in the ES and applied in the context of the receptor that is being assessed.
4.2.33	Paragraphs 8.4.15 to 8.4.17 and Table 8.15	Very low value/ sensitivity	Table 8.15 states that low and very low value receptors would be scoped out. However, Chapter 8 of the Scoping Report does not identify any receptors as 'very low value' both within the methodology and in the baseline. The ES should make clear the value/ sensitivity of each receptor and ensure the approach applied is fully explained in the assessment methodology.
4.2.34	Paragraph 8.4.36	Sustainable Drainage Strategy (SuDS)	If SuDS are to be implemented at pigging stations, the location of the SuDS and an assessment of their effectiveness at mitigating flood risk should be included within the ES.

4.3 Historic Environment

(Scoping Report Volume 1, Chapter 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.3.1	Paragraph 9.4.8 and Table 9.6	Potential effects – archaeological remains during operation	The Scoping Report states that archaeological remains are not sensitive to any impacts during operation and so would be scoped out. The Inspectorate considers that, depending on circumstances, effects on setting could occur during operation. From the information in Chapter 3, a number of above ground elements (marker posts, a new pigging station, transformer rectifier cabinets, fenced encloses surrounding valves) are proposed as part of the Proposed Development and it is not clear how these have been assessed with respect to impacts on setting. Therefore, the Inspectorate considers that an assessment of likely significant effects on archaeological remains during operation should be included in the ES, where significant effects are likely to occur.
4.3.2	Paragraphs 9.4.9 to 9.4.10	Effects on setting – archaeological remains within the 300m - 1km band during construction	It is noted that a Zone of Theoretical Visibility (ZTV) has not yet been established for the Proposed Development and it is not clear how this has been incorporated into the assessment of the individual assets described. Paragraph 9.4.9 refers to nine Scheduled Monuments being incorporated into the baseline, but goes on to summarise effects for eleven. This anomaly reduces confidence in the information contained in the Scoping Report. The Scoping Report also refers to temporary impacts during construction but does not provide any explanation as to how the information on construction phasing in Section 3.8 of the Scoping Report has informed this position. The Inspectorate does not agree that the Scoping Report provides detailed information to scope these matters out. The ES must include an assessment of likely significant effects on the setting of

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			archaeological remains during construction, taking into account the ZTV established for the Proposed Development.
4.3.3	Paragraphs 9.4.11to 9.4.12, 9.4.17 to 9.4.18 and 9.4.24to 9.4.25	Physical impacts - historic buildings during construction	The Scoping Report states that the route has been designed to avoid Grade I, II*, Grade II listed buildings, and non-designated historic buildings and there are no pathways by which damage could occur. Figure 9.1 shows a number of non-designated assets within the proposed Order Limits. Not all of these features have been assigned an asset number and accompanying description in Appendix 6 and therefore, it has not been possible to verify if any of these are historic buildings. This is a matter which should be clarified in the ES. On the basis of the information provided within the Scoping Report, it is not anticipated that the proposed works would result in significant effects arising from physical impacts beyond the Order Limits. Therefore, subject to the clarification above and depending on the outcomes of further desk based assessment identified in the Scoping Report, the Inspectorate agrees to scope this matter out of the ES.
4.3.4	Paragraphs 9.4.14 to 9.4.16, 9.4.19 to 9.4.20 and 9.4.26 to 9.4.27	Effects on setting of historic buildings – all stages of the Proposed Development	These paragraphs pertain to Grade I, II*, and Grade II listed buildings, and non-designated historic buildings. The summary assessment presented concludes that significant results would not occur and proposes to scope out assessment of effects on these assets. It is noted that a ZTV has not yet been established for the Proposed Development and it is not clear how this has been incorporated into the assessment of the individual assets described. The assessment refers to temporary impacts during construction, however no detailed information is provided and it is not evident how the information on construction phasing in Section 3.8 of the Scoping Report has informed this position.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The assessment also makes reference to impacts on settings from the presence of marker posts during the operational phase but does not mention how the other above ground structures of the Proposed Development have been taken into account. In the absence of this information the Inspectorate does not agree to scope these matters out. The ES should include an assessment of the likely significant effects on the setting of historic buildings, for all stages of the development.
4.3.5	Paragraphs 9.4.21 to 9.4.23	Physical impacts and impacts to setting - Conservation Areas during construction and operation	The Scoping Report states that the potential impacts on the four Conservation Areas identified would not produce significant effects, and concludes to scope these matters out of the assessment. The Inspectorate considers that insufficient detail has been provided about the specific impacts anticipated. Figure 9.1 shows the locations of the Conservation Areas but there is no evidence of how the characteristics of the construction and operational phases have been taken into account in order to reach this conclusion. The Scoping Report also makes reference to impacts on setting from the presence of marker posts during the operational phase but does not mention how the other above ground structures of the Proposed Development have been taken into account. In the absence of this information the Inspectorate does not agree to scope this matter out. The ES should assess the likely significant effects on Conservation Areas during both construction and operation of the Proposed Development.
4.3.6	Paragraph 9.4.30	Potential impacts to setting – historic landscapes during operation	The Scoping Report makes reference to impacts on setting from the presence of marker posts during the operational phase. The assessment does not mention how the other above ground structures of the Proposed Development have been taken into account. However,

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			given the information in the Scoping Report in Chapter 3 about the nature of these structures, together with their likely locations indicated in the Scoping Report and on Figure 9.1, the Inspectorate considers that any impacts to setting would be unlikely to result in significant effects. The Inspectorate agrees that this matter can be scoped out of the ES.
4.3.7	Table 9.6	Impacts during construction to archaeological remains and historic landscapes	The Scoping Report includes contradictory information in that it proposes to scope in physical impacts during construction to archaeological remains and historic landscapes over 300m from the Proposed Development. However, it also only refers to these assets as being scoped in where they within 300m of the Order Limits. The Inspectorate considers that physical impacts to these assets should be considered in the ES, over the geographical extent at which impacts could occur.

ID	Ref	Other points	Inspectorate's comments
4.3.8	Paragraphs 9.1.5 and 9.3.7, Section 9.5, and Table 9.4	Methodology	The Scoping Report suggests that DMRB HA 208/07 will be used to establish the value and the significance of effects for the Proposed Development. However, other guidance is referred to in paragraph 9.3.7 with respect to the assessment of value and Table 9.4 sets out criteria applied to assessment of value based on this. The ES should clearly explain the methodology and apply guidance consistently unless where stated and justified. Reference is made to Chapter 6 for the matrix of significance of effects. This does not include receptors of 'unknown' value which are identified in Table 9.4. Specific methodology applicable to the aspect chapter should be included in the ES.

ID	Ref	Other points	Inspectorate's comments
4.3.9	Paragraphs 9.3.1 and 9.3.2	Study area	The Inspectorate notes the intent to assess impacts to receptors within 300m of the Proposed Development. There is no explanation as to why this is an appropriate study area. The Inspectorate considers that there is a risk that potential effects to sensitive cultural heritage assets, in particular known designated assets, could be missed. The Inspectorate advises that the study area for the assessment of both physical impacts and for setting should be based on the extent of the impacts. The Scoping Report suggests that a ZTV will be used to establish the study area for the assessment of setting and this has not yet been established for the Proposed Development. The Inspectorate considers that the ZTV (once established) is an appropriate method to establish the study area for impacts to setting. Cross-referencing to relevant information in the Landscape and Visual Impact aspect chapter and/ or supporting appendices should be included.
4.3.10	Paragraph 9.3.3, Figure 9.1 and Appendix 6	Baseline	The asset numbers referenced in the Scoping Report (as listed in Appendix 6 and shown on Figure 9.1) are essential to understanding the baseline information. It is noted that assets of a low or negligible value and undesignated buildings are not numbered, and Conservation Areas are not labelled. The ES should clearly identify each asset and provide the information to understand the specific effects that apply to each.
4.3.11	Paragraph 9.4.4	Potential physical impacts	The Inspectorate considers that the ES should address impacts to drainage and groundwater movement where these may result in significant impacts to heritage assets. Cross reference should be made to the relevant assessments (eg Scoping Report Chapter 8, Water, and Chapter 11, Soils and Geology). Historic England has provided advice on this matter in their response in Appendix 2, which the Applicant should take into account.

ID	Ref	Other points	Inspectorate's comments
4.3.12	Paragraph 9.4.5	Potential impacts on setting	The Inspectorate considers that removal of archaeological deposits, and the longer term effects of vegetation removal in the landscape and the loss of landscape features could also result in effects on setting. The ES should consider these impacts where significant effects are likely to occur. Historic England has provided advice on this matter in their response in Appendix 2, which the Applicant should take into account.
4.3.13	Paragraph 9.5.5	Methodology – further assessment	The Scoping Report inconsistently addresses impacts to archaeological remains, historic buildings and historic landscapes suggesting that they are both relevant matters to the assessment and matters that should be scoped out. For the avoidance of doubt the Inspectorate requires these matters to be assessed in the ES. Furthermore, the Scoping Report implies that trial trenching may be ruled out of the methodology. The Inspectorate advises that it is extremely likely that trial trenching will be required in order to produce a robust assessment. Hampshire County Council has provided some advice in their consultation response with respect to the use of trial trenching and geophysical survey which the Applicant should take into account. The Applicant should aim to agree the extent of geophysical surveys with the relevant authorities.
4.3.14	Table 9.6	Summary of scope	The way in which Table 9.6 categorises receptors and their location relative to the Order Limits is not consistent with the preceding text. The Table omits mention of undesignated assets and does not always specify which development phase applies. This undermines confidence in the accuracy of the summary information. The Inspectorate considers that a summary table, which accurately corresponds to the text regarding matters taken into the assessment is useful, and should be included in the ES.

4.4 Landscape and Visual Effects

(Scoping Report Volume 1, Chapter 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.4.1	Paragraphs 10.4.20 to 22	Impact on landscape setting of Bramdean House, and Frimley Park (both Grade II Registered Park and Gardens) during construction	This Scoping Report proposes to scope this matter out on the basis that the pipeline route does not run through the landscape setting of the designated assets, and views are screened by existing development, and therefore there is no impact pathway. The Inspectorate agrees that impacts are unlikely and that the Land and Visual Impact Assessment (LVIA) is justified. This matter can be therefore scoped out of the ES.
4.4.2	Paragraph 10.4.23	Impact on landscape setting of Hinton Ampner House and Gardens (National Trust) during construction	The Scoping Report proposes to scope this matter out of the ES due to distance from the Proposed Development to the designated asset, and that the land crossed by the Proposed Development does not form part of the landscape setting. The Scoping Report states that visual effects remain possible. The Inspectorate agrees that the decision to scope out impacts to setting of these receptors from the LVIA is justified. It is understood that visual effects may still apply, subject to confirmation upon the extent of vegetation loss and the establishment of the ZTV for the Proposed Development.
4.4.3	Paragraph 10.4.28	Impact on the landscape setting of Grade II listed buildings further than 300m of the Project during construction	The Scoping Report proposes to scope this matter out of the ES, as the landscape setting of Grade II listed buildings are usually geographically restricted to the immediate surroundings. The Inspectorate considers that the analysis of views to and from these assets should be based on the extent of potential impacts, and that the application of an arbitrary distance is not the most appropriate approach. Therefore in the absence of evidence to support this approach the Inspectorate cannot agree to scope out this matter and the potential for significant effects should be assessed in the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.4.4	Paragraph 10.4.31	Landscape impacts relating to Ancient Woodland and Tree Preservation Orders (TPO) further than 15m from the Order Limits, during construction	The Scoping Report proposes to scope this matter out of the ES as there would be no direct impact on roots and branches beyond 15m, and there would be no impact pathway between the route and the designated asset beyond this distance. The Inspectorate is content to scope out the assessment of landscape impacts to Ancient Woodland and TPO beyond 15m of the Order Limits. The Inspectorate agrees there is unlikely to be significant effects in this regard. However, the Applicant should take care to ensure that all relevant areas of Ancient Woodland are identified. The Inspectorate has been made aware that the Natural England's Ancient Woodland Inventory does not identify ancient woodland areas that are smaller than 2ha. In addition, the Inspectorate considers that any undesignated mature trees or areas of woodland that could be affected by the Proposed Development should be assessed in terms of their contribution to the landscape (as noted in the Scoping Report in relation to Common Land and Open Access Land), where significant effects are likely to occur.
4.4.5	Paragraph 10.4.35	Landscape impacts during construction on areas of Common Land and Open Access land that are not physically affected by the Project	The Scoping Report proposes to scope this matter out of the ES stating that there is no impact pathway between the Proposed Development and the identified receptors due to no loss of vegetation. The Inspectorate agrees with the justification provided in the Scoping Report and this matter can be scoped out of the ES. The Inspectorate notes from the Scoping Report that visual effects would still potentially apply.
4.4.6	Paragraph 10.4.36	Landscape impact on Lightwater and Bedfont Lakes Country Parks during construction	The Scoping Report proposes to scope this matter out of the ES, stating that as they will not be physically affected, there is no impact pathway between the Proposed Development and the designated assets. While Table A3.3.1 of Appendix 3 of the Scoping Report proposes a few representative viewpoints at these features, these have not been

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			subject to confirmation (including through application of the ZTV). The Inspectorate advises that the Applicant assess whether visual impacts could result in significant effects to landscape. Therefore this matter should be assessed in the ES.
4.4.7	Paragraph 10.4.37	Landscape impact on Green Belt and green space as identified within Local Plans, during construction	The Scoping Report proposes to scope this matter out of the ES as the openness of the Local Plan designations are not sensitive to the temporary impact of construction, and the limited size and number of above ground structures. The Inspectorate agrees that significant landscape effects on these features are unlikely and this matter can be scoped out of the ES. The Inspectorate notes from the Scoping Report that visual effects would still potentially apply.
4.4.8	Paragraph 10.4.43	Landscape and visual effects during operation	The Inspectorate does not agree that this matter can be scoped out of the assessment. The Inspectorate considers that the landscape and visual impact of vegetation loss during construction will still be relevant during operation as reinstatement and mitigation planting takes time to become fully established. There will also be considerable above ground assets during the operational phases of the Proposed Development including the pigging station proposed near Boorley Green, which will include artificial lighting as well as the structures themselves. However, the Scoping Report suggests that this matters will be assessed using the year 15 design scenario. The Inspectorate considers that this would be an acceptable approach to assess this matter.

ID	Ref	Other points	Inspectorate's comments
4.4.9	Paragraphs 10.5.7 to	Study Area used for the assessment will be 1km from the	It is welcomed that the effect on longer distance views will be considered by selecting viewpoints from the ZTV up to 5km from the

ID	Ref	Other points	Inspectorate's comments
	10.5.8	proposed Order Limits	proposed Order Limits. Viewpoints should be agreed with relevant local authorities. The Inspectorate advises that the study area should be based on the extent of potential impacts, and that the ZTV will be essential in selecting viewpoints.
4.4.10	Figure 10.1	Thames Basin Lowlands National Character Area (NCA)	The Scoping Report indicates that Thames Basin Lowlands NCA falls within the 1km buffer of the Order Limits. However, the Scoping Report only considers NCA within the Order Limits and does not justify this approach, which appears inconsistent given that this NCA is identified within the 1km Study Area. If significant effects are likely on the landscape character of Thames Basin Lowlands NCA, then the impact on this NCA should be included within the scope of the LVIA.
4.4.11	n/a	Special Qualities of the South Downs National Park (SDNP) and areas of local Landscape Importance	The ES should make reference to the full list of the SDNP Special Qualities. The ES should also make reference be the 2010 Government circular on English National Parks and the Broads[3]. The Applicant should make efforts to agree the approach to assessing impacts on the SDNP with South Downs National Park Authority. Runnymede Borough Council has provided advice in relation to areas of Landscape Importance in the relevant Local Plan (see Appendix 2 to this Opinion), which the Applicant should also take into account.
4.4.12	n/a	Embedded Mitigation	The ES should describe any embedded mitigation relied upon within the assessment including mitigation to address impacts at construction compound locations. The SDNP Authority have provided advice in their consultation response around the siting of construction compounds, to which the

[3] English national parks and the broads: UK government vision and circular 2010

ID	Ref	Other points	Inspectorate's comments
			Applicant should have regard when arriving at embedded mitigation measures (see Appendix 2 to this Opinion).
4.4.13	n/a	Effects on Landscape Character	The assessment of effects on landscape character should be informed by relevant Landscape Character Assessments (eg Hampshire Integrated Character Assessment, South Downs Integrated Landscape Character Assessment, and Surrey Landscape Character Assessment) and take into account drivers for change and key sensitivities.
4.4.14	n/a	International Dark Sky Reserve and impacts of lighting	The Scoping Report makes reference to possibly requiring night-time working and to lighting around above permanent ground structures during operation. The ES should assess impacts from lighting on the International Dark Sky Reserve designation within the National Park and on any other sensitive receptors which could be subject to significant effects.

4.5 Soils and Geology

(Scoping Report Volume 1, Chapter 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.5.1	Paragraphs 11.4.2 and 11.4.3	Soils: Loss of Best and Most Versatile (BMV) land during construction	The Scoping Report proposes to scope this matter out of the ES due to the loss of BMV land being temporary and the land being restored back to the landowner's preference. As the Scoping Report has not included a definition of 'temporary' or information regarding how the land will be restored, the Inspectorate is not confident that no significant effects will occur from the loss of BMV land and an assessment of the effects arising from the loss of BMV land during construction should be included within the ES, where significant effects are likely to occur.
4.5.2	Paragraphs 11.4.2 and 11.4.3	Soils: Deterioration of soil quality and of soil properties through handling and storage and deterioration of sensitive soils during construction	The Scoping Report proposes to scope these matters out of the ES due to the low likelihood of significant effects occurring based on the implementation of the mitigation measures described within Chapter 4 and the outline CoCP. The mitigation measures state a bespoke soil management strategy and a method statement will be produced which will outline the soil stripping, handling, storage and reinstatement. However, the Scoping Report has not provided sufficient detail to provide confidence that soil will be appropriately managed during the construction phase such that no significant effects are likely to occur. These matters should be assessed within the ES, where significant effects are likely to occur. Any proposed mitigation measures should be described and appropriately secured.
4.5.3	Paragraphs 11.4.2 and 11.4.3	Soils: Deterioration of soils important for sensitive ecological receptors during construction	This matter has been scoped out of Soils and Geology assessment on the basis it has been considered within Biodiversity aspect chapter. The Inspectorate does not consider that this matter has been sufficiently addressed within the Biodiversity aspect chapter and therefore, does not agree that this matter can be scoped out of the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			ES. The ES should assess this matter, with appropriate cross reference between the Soils and Biodiversity Chapters as required.
4.5.4	Paragraphs 11.4.4, 11.4.15 and 11.4.16	Soils: land contamination and all other effects during operation	Having considered the nature of the Proposed Development and the information provided in the Scoping Report, the Inspectorate agrees that significant effects during operation are unlikely. However, there remains a low risk of fuel leakage impacts to soils during operation. Significant effects could arise, particularly in the case of sensitive soils being affected by uncontrolled leaks. The Inspectorate would expect to see consideration of leaks and spills in the ES and any mitigation measures described and secured, as appropriate. It is also unclear how the operational of the Proposed Development may affect field drainage regimes and the potential impact this could have on soils. The ES should state whether changes to field drainage regimes will have a significant impact on soils with appropriate cross reference to the relevant water section. In the absence of information about appropriate measures, it is considered that this matter should be assessed within the ES.
4.5.5	Paragraph 11.4.5 to 11.4.6 and Table 11.14	Geology: Sites of geological importance and geology during construction and operation	Given that no designated sites of geological importance or potential contamination pathways that may affect sites of geological importance have been identified within the assessment study area, the Inspectorate agrees that this matter can be scoped out of the impact assessment within the ES.
4.5.6	Paragraph 11.4.7 and Table 11.14	Minerals: Effects on minerals during construction	The Scoping Report states that the effects on minerals during construction can be scoped out of the assessment due to being managed through agreements with operating companies. However, no evidence of agreement with operating companies has been included within the Scoping Report. In addition, the Scoping Report identifies gaps in the baseline information, and the Inspectorate advises that

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			the Applicant forms the most robust baseline possible before excluding the possibility of effects. Surrey County Council and Runnymede Borough Council have provided information on existing mineral sites within their responses in Appendix 2. In light of these points, the Inspectorate does not agree that this matter can be scoped out of the impact assessment and therefore, an assessment must be included within the ES.
4.5.7	Paragraph 11.4.14, Tables 11.11 and 11.14	Contaminated sites of low and negligible sensitivity/ source potential during construction	The Inspectorate agrees that this matter can be scoped out of the impact assessment within the ES due to the very low likelihood of significant effects occurring from contaminated sites of low sensitivity/ source potential.
4.5.8	Table 11.7	Aquifers	The Scoping Report states that aquifers will be assessed within the Water aspect chapter of the ES and acknowledges their role in the source-pathway-receptor model used in the land contamination assessment. The Inspectorate agrees that this is an appropriate approach and that this matter can be suitably assessed elsewhere within the ES; however, the Applicant should ensure cross reference is made to the Water chapter where appropriate.

ID	Ref	Other points	Inspectorate's comments
4.5.1	Table 11.11	Historical potentially contaminated sites: Industrial estates	The Scoping Report has not provided information on the industrial estates drainage, catchment areas or whether underground tanks have been used. Without this information, the Scoping Report has not sufficiently justified the industrial estate classification as low risk. The Inspectorate does not agree that this matter can be scoped out of the ES. The ES should include an assessment of impacts from former

ID	Ref	Other points	Inspectorate's comments
			industrial estates where significant effects are likely to occur.
4.5.2	Paragraph 11.3.46	Land contamination sites	Data regarding the location of landfills, registered waste transport sites, and other land contamination sites of potential significant was not received by the Applicant in time to be incorporated into the Scoping Report. This ES should incorporate any such data and assess any likely significant effects . Surrey County Council and Runnymede Borough Council have provided information on known landfill sites within their responses in Appendix 2, which the Applicant should take into account within the assessment.
4.5.3	Paragraphs 11.3.49 to 11.3.56	Land contamination baseline	The Inspectorate notes that paragraph 8.3.78 of the Water aspect chapter states that several pollution events, including 1 major and 2 significant pollution events have affected surface waters. In addition the Inspectorate notes the reference to a damaged multiproduct line at paragraph 11.3.56. The ES should include information on pollution events and contaminated land in the baseline, such as those identified above, and assess any likely significant effects related to soils.
4.5.4	Paragraph 11.3.59	Conceptual site model	The Scoping Report states there is not enough information at this stage to develop conceptual site models for individual sites potentially affected by contamination. It is unclear whether the Applicant intends to produce a conceptual site model for the ES. The Inspectorates notes that within the CLR:11 guidance stated to be used for the assessment of soils and geology, conceptual models are used to identify potential pollution pathways and forms a main part of the risk assessment. The assessment in the ES should be underpinned by relevant baseline information, including where necessary, conceptual site models.

4.6 Land Use

(Scoping Report Volume 1, Chapter 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.6.1	Paragraphs 12.4.4, 12.4.10, 12.4.16, 12.4.23 and 12.4.29	Temporary loss of access to residential properties and temporary loss of boundary features Temporary loss of access to agricultural land, temporary loss of boundary features, disruption to livestock water supply and field drainage systems Temporary loss of access to development land and temporary loss of boundary features	The Scoping Report proposes that these matters be scoped out on the basis that they will be managed through mitigation measures described in Chapter 4 and the CoCP. However, the mitigation measures presented in the Scoping Report lack sufficient detail. In the absence of detailed mitigation measures, the Inspectorate does not agree that this matter can be scoped out of the ES. Where significant effects are likely to occur this should be assessed in the ES.
4.6.2	Paragraphs 12.4.19 and 12.4.20	Effect of waste production on commercial landfill and waste facility sites in the South East	Based on the information in the Scoping Report on the baseline conditions and the characteristics of the Proposed Development in terms of waste arising, the Inspectorate agrees that there are unlikely to be significant effects and that this matter can be scoped out of the ES.
4.6.3	Paragraph 12.4.31	Future sterilisation of land allocations and impact on land use during operation	Having regard to the characteristics of the Proposed Development, the Inspectorate agrees that impacts resulting from the future sterilisation of land allocations are unlikely to generate significant environmental effects. However, the Inspectorate also notes the intention to undertake a cumulative impact assessment in accordance with the Inspectorate's Advice Note Seventeen, which would include reasonably foreseeable developments.

ID	Ref	Other points	Inspectorate's comments
4.6.4	n/a	No other points	n/a

4.7 People and Communities

(Scoping Report Volume 1, Chapter 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.7.1	Paragraphs 13.4.6 to 13.4.10	Employment: Effects on employment during the construction period	Paragraph 13.4.8 explains that the Proposed Development would not have an effect on the existing labour market and that the Proposed Development would serve to safeguard employment rather than generate employment opportunities. The Inspectorate has had regard to the characteristics of the Proposed Development and agrees that significant effects are unlikely and that this matter can be scoped out of the ES.
4.7.2	Paragraphs 13.4.11 to 13.4.12	Employment: Operational effects in respect of employment	The Inspectorate understands that general operations of the Proposed Development would be undertaken by an existing workforce with indirect and induced employment opportunity limited. Accordingly the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES.
4.7.3	Paragraphs 13.4.13 to 13.4.16	Economy: Effects on local and national supply chains during construction	The Inspectorate has had regard to the characteristics of the Proposed Development and agrees that significant effects on local and national supply chains during construction are unlikely and that this matter can be scoped out of the ES.
4.7.4	Paragraphs 13.4.17 and 13.4.18	Economy: Operational effects on the local economy and on national and local supply chains	The Inspectorate has had regard to the characteristics of the Proposed Development and agrees that significant effects on local and national supply chains during operation are unlikely and that this matter can be scoped out of the ES.
4.7.5	Paragraphs 13.4.29 to 13.4.30	Tourism receptors: Operational effects on tourism receptors (disruption, community severance	The pipeline would be situated underground and there is not expected to be any potential for significant effect on tourism receptors, or on associated visitor behaviour during the operation of the pipeline. The Inspectorate considers that significant effects are unlikely and that

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		and changes in access)	these matters could be scoped out of the people and communities assessment.
4.7.6	Paragraphs 13.4.31 to 13.4.35	Accommodation: Operational effects on worker accommodation	The Inspectorate understands that the replacement pipeline would be operated by an already existing workforce, and that most workers would already be residing within local communities. Accordingly the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES.
4.7.7	Paragraph 13.4.37	Tourism sector: Operational effects on the tourism sector	The Inspectorate has had regard to the characteristics of the Proposed Development and agrees that significant effects on the tourism sector during operation are unlikely and this matter can be scoped out of the ES.
4.7.8	Paragraph 13.4.50	Effects on communities: Operational effects from disruption in rural and urban areas (air quality, traffic, noise, vibration and visual impacts) on communities	The Inspectorate has had regard to the characteristics of the Proposed Development and agrees that significant effects from disruption in rural and urban areas (air quality, traffic, noise, vibration and visual impacts) on communities during operation are unlikely and this matter can be scoped out of the ES.
4.7.9	Paragraph 13.4.51	Effects on communities: Operational effects from disruption during operation in rural and urban areas (including schools)	The Inspectorate has had regard to the characteristics of the Proposed Development and agrees that significant effects on from disruption during operation in rural and urban areas (including schools) are unlikely and that this matter can be scoped out of the ES.
4.7.10	Paragraphs 13.4.52 to 13.4.53	Effects on communities: Operational effects on community severance and in changes in access to local communities in rural or urban areas	The Inspectorate considers that impacts to community severance, changes in access and disruption to tourism receptors are likely to be temporary occurring during construction. The Inspectorate does not anticipate that these impacts will result in significant effects and agrees that this matter can be scope out of the ES.
4.7.11	Paragraphs 13.4.54 to	Public safety: Construction and	The Inspectorate has had regard to the characteristics of the Proposed Development and agrees that significant effects to public safety during

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	13.4.58	effects on public safety	construction are unlikely and this matter can be scoped out of the ES.
4.7.12	Paragraphs 13.4.59 to 13.4.60	Public safety: Operational effects on public safety	The Inspectorate has had regard to the characteristics of the Proposed Development and agrees that significant effects to public safety during operation are unlikely and this matter can be scoped out of the ES. The Inspectorate notes that risks of major accidents are discussed in Chapter 15 of the Scoping Report and therefore comments on this matter are provided in Table 4.9 of the Opinion below.
4.7.13	Paragraphs 13.4.20, 13.4.23 and 13.4.40	Air quality effects (including dust) on tourism receptors and communities during construction and operation	The Inspectorate does not agree that effects associated with air quality changes due to construction can be scoped out at this stage. The Scoping Report currently does not provide detailed information regarding the location and value of sensitive receptors that could be within or adjacent to the Proposed Development route and could potentially be affected by dust deposition, nor does it entirely confirm the risk from construction generated dust associated with the Proposed Development. The ES should clearly identify the risk of construction dust and the sensitivity of tourism and communities receptors for the Proposed Development, where significant effects are likely to occur. The mitigation relied upon in the assessment should be specified in the ES and appropriately secured.

ID	Ref	Other points	Inspectorate's comments
4.7.14	Paragraph 13.3.3	Study Area	Chapter 13 of the Scoping Report does not explain why a buffer zone of 500m from the Order Limits has been considered in the assessment. Although the Inspectorate notes the further statement at paragraph 13.3.3 which indicates that key receptors would be considered beyond this distance. Justification for determining this distance should be provided in the ES. The Applicant should make effort to agree the study area with relevant consultation bodies. It should reflect the extent of the anticipated impacts.
4.7.15	Paragraph 13.3.6	Study Area	Greater London Authority (GLA) data has not been included in the baseline. A short distance of the Proposed Development would be located within the administrative area of the GLA and it has been determined that including GLA data would not add value to the assessment and has been omitted from the baseline. This approach should be justified, and agreement to this approach should be provided by the relevant consultation bodies.

4.8 Health Impacts

(Scoping Report Volume 1, Chapter 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.8.1	Paragraphs 14.4.10 to 14.4.12 and Table 14.2	Disruption to green space and nature during construction: Visual amenity during and beyond construction, resulting in reduced use of green space for physical activity and stress relief	The Scoping Report proposes to scope out an assessment of the potential impact on visual amenity during and beyond construction, resulting in reduced use of green space for physical activity and stress relief on the basis that mitigation measures would be sufficient to mitigate any effects on health. However, no such mitigation measures are presented in the Scoping Report. In the absence of detailed evidence to support this assertion, the Inspectorate does not consider that detailed information has been provided to justify a scoping out of the assessment at this stage. The ES should therefore include an assessment of these matters, where significant effects are likely to occur.
4.8.2	Paragraphs 14.4.13 to 14.4.14 and Table 14.2	Disruption to green space and nature during construction: Construction activities resulting in loss of green space used for physical activity and stress relief	The Scoping Report proposes to scope out these matters out on the basis that people have access to alternative areas of green space. The Scoping Report does not provide detailed evidence to support this assertion. The Inspectorate does not consider that detailed information has been provided on the existence of alternative green space to justify a scoping these matters out the ES. The ES should therefore assess these matters where significant effects are likely to occur.
4.8.3	Paragraph 14.4.15	Disruption to green space during operation.	The Inspectorate has had regard to the characteristics of the Proposed Development and agrees that significant effects from disruption to green space during operation are unlikely and this matter can be scoped out of the ES.
4.8.4	Paragraphs 14.4.19 to	Effects on communities: Disruption to communities causing decreased	The Scoping Report proposes to scope out an assessment of health effects occurring as a result of disruption to communities causing

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	14.4.20 and Table 14.2	social cohesion and associated negative effects	decreased social cohesion and associated negative effects on the basis that there is no direct impact pathway. While an assessment of such disruption will be presented in the People and Communities chapter of the ES, it will not address likely significant effects from a health perspective. In the absence of detailed evidence to support this assertion, the Inspectorate does not consider that detailed information has been provided to justify a scoping out these matters. The ES should therefore fully assess the matters where significant effects are likely to occur.
4.8.5	Paragraph 14.21	Effects on communities: Health effects on communities during operation	The Inspectorate has had regard to the characteristics of the Proposed Development and agrees that significant effects on communities during operation are unlikely and this matter can be scoped out of the ES.
4.8.6	Paragraph 14.4.25	Traffic, Transport, Connectivity, Severance and Physical Injury from Accidents: Health assessment of traffic and transport on human health in rural areas	The Inspectorate has had regard to the information provided in the Scoping Report and the characteristics of the Proposed Development and agrees that significant effects from to human health from changes to traffic and transport in rural areas are unlikely and this matter can be scoped out of the ES.
4.8.7	Paragraph1 4.4.30 and Table 14.2	Traffic, Transport, Connectivity, Severance and Physical Injury from Accidents: Health effects as a result of increased congestion, driver stress and severance in urban areas	The Scoping Report proposes to scope out these matters but limited information is provided in the Scoping Report on the mitigation measures referenced. In the absence of detailed evidence to support this assertion, the Inspectorate does not consider that detailed information has been provided to justify a scoping out these matters. The ES should therefore fully assess the matters where significant effects are likely to occur.
4.8.8	Paragraph 14.4.31	Traffic, Transport, Connectivity, Severance and Physical Injury from Accidents: Health effects of traffic	The Inspectorate has had regard to the characteristics of the Proposed Development and agrees that significant effects to health from traffic during operation are unlikely and this matter can be scoped out of the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		during operation	ES.
4.8.9	Paragraphs 14.4.38 to 14.4.40 and Table 14.2	Soil contamination: Health effects resulting from a build-up of ground gases and/or soil contamination.	The Scoping Report proposes to scope out these matters, however, limited information on such mitigation measures is presented in the Scoping Report. In the absence of detailed evidence to support this assertion, the Inspectorate does not consider that detailed information has been provided to justify a scoping these matters out. The ES should therefore assess these matters where likely significant effects occur.
4.8.10	Paragraph1 4.4.41	Soil contamination: Health effects relating to soil contamination effects during operation	The Inspectorate has had regard to the characteristics of the Proposed Development and agrees that significant effects to from soil contamination during operation are unlikely and this matter can be scoped out of the ES.
4.8.11	Paragraph 14.4.47 and Table 14.2	Noise and vibration: Health effects as a result of noise disruption, such as sleep disturbance	The Scoping Report proposes to scope out these matters, however, limited information on mitigation measures relied upon is presented in the Scoping Report. In the absence of detailed evidence to support the mitigation measures, the Inspectorate does not consider that detailed information has been provided to justify a scoping out of the assessment at this stage. The ES should therefore assess these matters where likely significant effects occur.
4.8.12	Paragraph 14.4.48	Noise and vibration: Noise and vibration health effects during operation	Whilst the Inspectorate agrees that the majority of the operational development would not generate significant noise and vibration, the Inspectorate notes that the Scoping Report does not provide a description of the likely works to upgrade and modernise the existing pumping station at Alton, including any anticipated noise and vibration. It also does not describe the likely noise and vibration emissions and characteristics for the new pigging station at Boorley Green. The ES should describe the noise and vibration emissions and characteristics of these elements during operation. Where significant

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			changes to noise and vibration could arise, and where there are sensitive human or ecological receptors that could be affected by such changes, the ES should provide an assessment, where significant effects are likely to occur.
4.8.13	Paragraph 14.4.55 and Table 14.2	Water: Health effects during construction from contaminants of groundwater entering public water supplies	The Scoping Report proposes to scope out an assessment of health effects from contaminants of groundwater entering public water supplies on the basis that mitigation measures would be sufficient to mitigate any effects on health. However, limited information on such mitigation measures is presented in the Scoping Report. In the absence of detailed evidence to support this assertion, the Inspectorate does not consider that detailed information has been provided to justify a scoping out of the assessment at this stage. The ES should assess the matter where significant effects are likely to occur.
4.8.14	Paragraph 14.4.50 to 14.4.53 and Table 14.2	Water: Potential health effects during construction from flooding such as stress	The Scoping Report proposes to scope out an assessment of health effects from flooding such as stress on the basis that mitigation measures would be sufficient to mitigate any effects on health. However, limited information on such mitigation measures is presented in the Scoping Report. In the absence of detailed evidence to support this assertion, the Inspectorate does not consider that detailed information has been provided to justify a scoping out of the assessment at this stage. The ES should therefore assess the matter where significant effects are likely to occur.
4.8.15	Paragraph 14.4.59	Water: Health effects from contaminants of groundwater during operation entering public water supplies or flooding.	The Inspectorate has had regard to the characteristics of the Proposed Development and agrees that significant effects from contaminants of groundwater entering public water supplies or flooding during operation are unlikely and this matter can be scoped out of the ES.
4.8.16	Paragraph	Major accidents: Heath effects from	The Scoping Report proposes to scope out an assessment of health

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	14.4.61	major accidents during construction	effects arising from major accidents during construction on the basis that the major accidents assessment concludes no likely significant effects on population and health as a result of a major accident during construction. The Applicant is directed to the comments in Table 4.9 below with regards to matters relating to major accidents and health.
4.8.17	Paragraph 14.4.66 and Table 14.2	Major accidents: Health effects occurring as a result of fires from major releases of aviation fuels	The Scoping Report proposes to scope out an assessment of health effects occurring as a result of fires from major releases of aviation fuels on the basis that this will be assessed in the Major Accidents chapter of the ES. The Inspectorate is satisfied with this approach and asks that the Applicant ensures adequate cross referencing is in placed in the ES to assist the reader.
4.8.18	Paragraph 14.4.70 andTable 14.2	Community well-being: Well-being effects due to public perception of effects	The Scoping Report proposes to scope out an assessment of well-being effects due to public perception of the effects of the Proposed Development on the basis that mitigation measures would be sufficient to mitigate any effects on health. However, limited information on such mitigation measures is presented in the Scoping Report. In the absence of detailed evidence to support this assertion, the Inspectorate does not consider that detailed information has been provided to justify a scoping out of the assessment at this stage. The ES should assess the where significant effects are likely to occur.

ID	Ref	Other points	Inspectorate's comments
4.8.19	Paragraph 14.4.1	Aspects and matters considered to be not significant	The Inspectorate acknowledges that the Applicant's proposed approach is to undertake an assessment of impacts to health informed by the outcome in other relevant aspect chapters. The Applicant should ensure that significant effects to health are assessed and presented in the ES.

4.8.20	Table 5.1	Stakeholder engagement	The Applicant should make effort to agree the approach to the assessment with relevant consultation bodies.
4.8.21	Figure 14.1	Determinants of health and well-being	The Scoping Report includes an intent to examine the ecological determinants of health and well-being shown in Figure 14.1 in the assessment of human health. The Applicant should ensure that the ES also assesses the social determinants of health and well-being, to include living and working conditions, social and community networks, and individual lifestyle factors.
4.8.22	Paragraph 14.3.1	Study Area	The Scoping Report states that the study area will vary depending on which aspect relevant to health is being assessed. The ES should clearly state which study area is being applied to the assessment of health impacts. The ES should clearly cross reference the relevant sections of other aspect chapters and supporting plans where relevant.
4.8.23	Paragraph 14.3.1	Baseline	The baseline data in the Scoping Report is derived from the counties of Surrey and Hampshire only and omits other areas such as the London Borough of Hounslow and the administrative area of the Greater London Authority. The Inspectorate considers that baseline data in the ES should represent all affected areas.

4.9 Major Accidents

(Scoping Report Volume 1, Chapter 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.9.1	Paragraph 15.1.4	Consideration of vulnerability to disasters, including natural disasters	The Scoping Report explains that a separate assessment of disasters is not included on the basis that they are considered to result in the same potential effects as major accidents. The Inspectorate advises that the ES must identify the impacts which could give rise to significant effects, considering both the potential for the Proposed Development to give rise to major accidents and disasters, and the vulnerability of the Proposed Development to those events. Chapter 15 treats these matters as one and the same with the universal matter being the significant release of aviation fuel leading to harmful effects on people or the environment. The Inspectorate considers that this approach may not capture all potential impacts. The ES should include an assessment of the vulnerability of the Proposed Development to disasters, including natural disasters, where significant effects are likely to occur.
4.9.2	Paragraph 15.1.5 and 15.4.2 and Table 15.4	Potential impact on receptors from diesel during construction	The Scoping Report proposes to scope out the release of diesel from temporary storage during construction as a source of major accidents. While it is identified as a hazard, the Scoping Report states that the scale of storage will be small and that good construction practices can mitigate effects. The Inspectorate considers that insufficiently detailed information about the planned temporary diesel storage and the construction practices relied upon has been provided to allow this matter to be scoped out. The ES should therefore assess this matter and provide a thorough explanation of the mitigation measures relied upon in the assessment.
4.9.3	Paragraphs 15.4.3, 15.4.15 and	Potential impact on receptors from release of methane from landfills	The Scoping Report proposes to scope out an assessment this matter on the basis that the risk of encountering significant methane-rich landfill gas from historic landfill is believed to be very low. The

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	Table 15.4	during construction	Scoping Report explains that ground investigations relevant to this matter are still ongoing. Accordingly the Inspectorate does not consider that detailed information has been provided to demonstrate that methane release would not result in a significant effect. The ES should therefore assess this matter where significant effects are likely to occur.
4.9.4	Paragraph 15.4.10 and Table 15.4	Potential impact of toxicity on population and human health	The Scoping Report proposes to scope out this matter and points to information contained in the Material Safety Data Sheet (MSDS) for aviation fuel which does not identify any associated toxicity. The Inspectorate has not been presented with this information and therefore cannot verify this conclusion. The ES should include an assessment of this matter, where significant effects are likely to occur.
4.9.5	Paragraph1 5.4.11 and Table 15.4	Potential impact from explosions on population and human health	The Scoping Report proposes to scope this matter out but there is limited detail to justify this approach. The Inspectorate does not consider that detailed information has been provided on the likelihood of explosions at above ground installations to justify a scoping out of the assessment at this stage. The ES should therefore assess this matter where significant effects are likely to occur.
4.9.6	Paragraph 15.4.12 and Table 15.4	Potential impact from fire on population and human health	The Scoping Report proposes to scope out this matter on the basis that aviation fuel is not flammable under UK ambient conditions and provides evidence of historic data supports a conclusion that aviation fuel does not present a fire risk. The Scoping Report also states that the principles of inherent safe design and good practice have been incorporated. However, there is an absence of detailed evidence to support this assertion. Accordingly the Inspectorate does not consider that detailed information has been provided to justify a scoping out this matter. The ES should assess this matter where significant effects are likely to occur.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.9.7	Paragraph 15.4.13 and Table 15.4	Potential toxicity impact on protected fauna species that are in metapopulations or which can readily move away	The Scoping Report proposes to scope out an assessment of these matters. However, there is an absence of detailed information to support this assertion. The Inspectorate does not consider that detailed information has been provided to justify a scoping out the assessment of this matter. The ES should assess this matter where significant effects are likely to occur.
4.9.8	Paragraph1 5.4.19 and Table 15.4	Potential air pollution impact and impact on climate due to release of aviation fuel	The Scoping Report proposes to scope out an assessment of this matter on the basis that any releases would be small scale and negligible. However, the Scoping Report lacks detailed evidence to support this assertion and the Inspectorate does not consider that detailed information has been provided to justify a scoping out this matter. The ES should assess this matter where significant effects are likely to occur.
4.9.9	Paragraph 15.4.21and Table 15.4	Potential impact of smoke or fire damage on material assets and cultural heritage	The Scoping Report proposes to scope out an assessment of this matter on the basis that it would require a major fire. The Scoping Report has not explained why this risk is unlikely to occur. Accordingly the Inspectorate does not consider that detailed information has been provided to justify a scoping this matter out. The ES should therefore assess the effects associated with this matter where significant effects are likely to occur.
4.9.10	Paragraph 15.4.22 and Table 15.4	Potential impact on landscape	The Scoping Report proposes to scope out an assessment of the potential impact on landscape on the basis that landscape does not have any assessment criteria under major accidents. The Inspectorate has had regard to the characteristics of the Proposed Development and agrees that significant effects on landscape are unlikely from a major accident and disasters perspective and this matter can be scoped out of the ES.

ID	Ref	Other points	Inspectorate's comments
4.9.11	Section 15.2	Policy and Legislation	Section 15.2 does not include the Civil Contingencies Act 2004, which the ES should have regard to when carrying out the assessment of effects from major accidents and disasters.
4.9.12	Sections 15.2 and 15.5	Methodology	The Scoping Report references numerous sources of regulatory guidance in Section 15.2, including Health and Safety Executive (HSE) 'Guidance Note L111'; HSE's 'Safety Report Assessment Manuals (SRAMs)'; HSE's 'Planning Advice for Developments near Hazardous Installations (PADHI)'; and 'The Chemicals and Downstream Oil Industries Forum (CDOIF) Guidelines for Environmental Risk Tolerability for COMAH Establishments'. While reference is made to L111, SRAMs and PADHI being drawn upon for in the development of the chapter, no further reference is made to this guidance, and it appears that the CDOIF Guidelines are chosen by the Applicant as the primary basis for its methodology. The ES should be clear on the methodology to be used by in the assessment. The Applicant should make effort to agree the approach with the relevant consultation bodies.
4.9.13	Section 15.3	Baseline conditions	The Scoping Report states that the baseline conditions have been largely informed by other aspect chapters. The Applicant should ensure that the ES provides an in-depth description of the baseline for the assessment of major accidents and disasters, including cross referencing and signposting to the relevant information contained elsewhere in the ES.
4.9.14	Paragraph 15.5.2	Study area	The Scoping Report follows CDOIF guidance in establishing the study area by considering the most sensitive receptors identified within 10km of the Proposed Development. The Applicant should make effort to agree the approach to defining the study area with relevant consultation bodies.

ID	Ref	Other points	Inspectorate's comments
4.9.15	Paragraph 15.5.6	Assessment of receptors	The Scoping Report states that an initial risk assessment would be carried out on the most vulnerable receptors and that if this demonstrates that there would be no significant effects, then it would be inferred that lesser vulnerable receptors would not suffer significant effects either. The Inspectorate does not agree with this approach. The assessment should identify all relevant receptors, their sensitivity, the potential impact pathways, the magnitude and significance of effect. This is consistent with the CDOIF methodology being applied by the Applicant which states that it is necessary to understand the potential for a major accident for each receptor.

4.10 Cumulative Effects

(Scoping Report Volume 1, Chapter 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.10.1	Paragraph 16.3.7	Effects on local plan development	The advices the Applicant to undertake an assessment having regard to the Inspectorate's Advice Note Seventeen, which would include reasonably foreseeable developments. The Applicant is encouraged to make efforts to agree the approach with relevant consultation bodies.
4.10.2	Table 16.1	Pre-2017 applications	The Scoping Report proposes to scope out an assessment of planning applications consented before 2017 but not yet started due to the three year time limit for construction imposed by planning permissions. The Inspectorate is of the view that this may exclude some very large and complex developments from consideration as part of the cumulative effects assessment, and advises the Applicant to make effort to agree the list of planning applications to be considered in the cumulative assessment with relevant consultation bodies.
4.10.3	Paragraph 16.4.4	Operational intra-development effects	The Scoping Report proposes to scope out operational intra-development cumulative effects on the basis that no single receptor has been identified at this stage which has to the potential to be affected by more than one impact arising from the Proposed Development during its operational phase. The Inspectorate has had regard to the characteristics of the Proposed Development and agrees that significant operational intra-development effects are unlikely and this matter can be scoped out of the ES.

ID	Ref	Other points	Inspectorate's comments
4.10.4	Paragraph 16.3.2	Baseline conditions	The Scoping Report states that the baseline conditions have been informed by other aspect chapters. The Applicant should ensure that the ES provides an in-depth description of the baseline for the assessment of cumulative effects, including cross referencing and signposting to the relevant sections of other aspect chapters that are being relied upon.
4.10.5	Paragraph 16.3.4, 16.3.8 and 16.5.2	Professional judgement	The Scoping Report refers to the use of professional judgement in order to determine the likely significance of effects. The application of professional judgement used within the assessment should be clearly identified and fully justified in the ES.
4.10.6	Table 16.3	Construction intra-development cumulative effects	Table 16.3 of the ES identifies where intra-development cumulative effects during construction will be assessed within the ES for each sensitive receptor. However, this table does not reference rural urban communities, rural tourists or soils, all of which are identified in Table 16.1 as receptors experiencing potential effects as a result of the Proposed Development. The Applicant should ensure that the ES presents a consistent assessment of all receptors identified.
4.10.7	Table 16.4	Heathrow Expansion	The Inspectorate notes that the proposed Heathrow Expansion development is scoped in to the cumulative impact assessment on the basis of traffic. Given the potential temporal overlap and the proximity between the developments, the ES should consider the potential for cumulative impacts with this project for all relevant aspects, where significant effects are likely to occur.
4.10.8	Table 16.4	Water infrastructure projects in Hampshire	Water infrastructure projects in Hampshire have been identified in Table 16.4 as scoped into the cumulative effects assessment. However, these projects do not appear on the accompanying Figure 16.1 of the Scoping Report. The Applicant should ensure that all projects scoped into the cumulative effects assessment are identified

ID	Ref	Other points	Inspectorate's comments
			on any accompanying figure within the ES.
4.10.9	Paragraph 16.6.2	Construction intra-development cumulative effects assessment	The Scoping Report states that intra-development cumulative effects during construction will be scoped within the aspect chapters of the ES and summarised within the cumulative effects chapter. The Applicant should also ensure that the ES contains an overarching section explaining the methodology used for the assessment of these effects and how this was applied to each individual aspect.
4.10.1(	Paragraph 16.6.4	Construction period	The Scoping Report states that for inter-development cumulative effects from construction, other developments have been identified based on the expected construction period of 2020-2021. However, paragraph 3.8.3 of the Scoping Report states that the expected construction period is 2021-2022. The Applicant should ensure that its expected construction period has been consistently assessed throughout the ES, and that for the purposes of inter-development cumulative effects, the appropriate projects have been identified.

4.11 Other Aspects

(Scoping Report Appendices: Appendix 7 Waste Technical Note; 8.1 Air Quality; 8.2 Traffic and Transportation; and 8.3 Noise and Vibration)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.11.1	Appendix 7 Waste Technical Note Paragraphs A7.4.2 to A7.4.5 and Table A7.6	Waste: Materials required for construction and operation	Appendix 7 states that due to the relatively low quantity of required construction and operation materials and the high quantity of materials available from multiple sources no significant effects are anticipated to occur to the availability of materials. The Inspectorate is content that the characteristics of the Proposed Development are such that significant effects in this regard are unlikely. The Inspectorate agrees that materials required for construction and operation can be scoped out of the impact assessment within the ES.
4.11.2	Appendix 7 Waste Technical Note Paragraphs A7.4.6 to A7.4.19 Table A7.6	Waste: Inert and hazardous waste produced during construction and operation and effects on waste capacity	Appendix 7 states that no significant effects on waste treatment and disposal facility's available capacity are anticipated to arise from the production of inert and hazardous waste during construction and operation, as the quantity of waste produced will not impact the inert and hazardous waste capacity in the region. On this basis the Inspectorate agrees that this matter can be scoped out of the impact assessment within the ES.
4.11.3	Appendix 8.1 Air Quality Paragraphs A8.1.4.4 to A8.1.4.13 and Table	Air Quality: Effects of construction generated dust (rural and urban areas)	Appendix 8.1 proposes to scope out construction dust due to the prevention of significant effects through the implementation of the mitigation measures outlined in Chapter 4 of the Scoping Report. Sensitive human and ecological receptors are identified within the buffer recommended by the Institute of Air Quality Management's (IAQM) Guidance on the assessment of dust from demolition and construction (2016). Appendix 8.1 indicates a medium risk of dust

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	A8.1.1		deposition from the construction compounds. Although it is not explicitly stated in the Scoping Report, the Inspectorate assumes this is the total for all compounds within the Proposed Development and not at each compound location. Sufficient justification to conclude on the risk from construction activities along the pipeline route is not provided. The Scoping Report also states that demolition activities are not anticipated, although this statement conflicts with statements made elsewhere in the Scoping Report (see comments at paragraph 2.3.2 and point 4.11.18 of the Opinion). The Inspectorate does not agree that effects associated with air quality changes due to construction can be scoped out. The Scoping Report currently does not provide detailed information regarding the location and value of sensitive receptors that could be within or adjacent to the Proposed Development route and could potentially be affected by dust deposition, nor does it entirely confirm the risk from construction generated dust associated with the Proposed Development. The ES should clearly identify the risk of construction dust and the sensitivity of receptors for the Proposed Development, where significant effects are likely. The ES should describe any proposed mitigation relied upon and the anticipated efficacy of the mitigation, before concluding on residual effects.
4.11.4	Appendix 8.1 Air Quality Table A8.1.1 and Paragraph A8.1.4.19	Air quality: Emissions from construction plant and machinery in rural and urban areas	The Air Quality Appendix proposed to scope out this matter due to the low likelihood of significant effects occurring to sensitive receptors including Air Quality Monitoring Areas (AQMA) on the basis that; the machinery will only be operating for a short duration, there would be a low number and size of plant machinery items operating simultaneously during construction, and that the IAQM *construction dust guidance the assessment of dust from demolition and construction* states that non road mobile machinery are unlikely to

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			make significant impacts on local air quality (paragraph A8.1.4.19). The Inspectorate agrees that the characteristics of the Proposed Development are such that impacts from construction plant and machinery emissions are unlikely to be significant and this matter can be scoped out of the impact assessment within the ES.
4.11.5	Appendix 8.1 Air Quality Table A8.1.1 and Paragraph A8.1.4.30	Air quality: Emissions from construction related road traffic	The Air Quality Appendix proposes to scope out this matter due to the increase in Annual Average Daily Traffic (AADT) from the Proposed Development not exceeding the EPUK/ IAQM screening criteria. Based on the conclusions in Appendix 7 the transport of construction materials and waste are considered unlikely to raise the AADT to exceed the EPUK/IAQM criteria; however, the Inspectorate notes some discrepancies in the calculations presented in Appendix 8.2 Traffic and Transport and Appendix 8.1 Air Quality, in particular for urban areas (see comments at point 4.11.9 below). Due to lack of clarity with regards to the data and the lack of information on the anticipated traffic flows and locations, displaced traffic effects, and cumulative effects, the Inspectorate considers that the ES should confirm the anticipated construction vehicle movements and present an assessment of air quality effects from increased construction vehicle movements on sensitive receptors (human and ecological – see comments in Table 4.1 and 4.11), where significant effects are likely to occur.
4.11.6	Appendix 8.1 Air Quality Paragraph A8.1.4.2	Air quality: Emissions from the operation of the pipeline	The Air Quality Appendix states "*there are no significant sources of air quality or dust effects associated with the operation of the pipeline. Therefore, these are not considered further."* On this basis and the information in the Scoping Report the Inspectorate agrees that emissions from the operation of the pipeline can be scoped out of the impact assessment within the ES.
4.11.7	Appendix	Traffic and Transport: Effects on	The Traffic and Transportation Appendix proposes to scope out this

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	8.2 Traffic and Transportation Table A8.2.8 and Paragraph A8.2.4.4	rural: • traffic flows; • journey times; and • collision and safety	matter as no significant effects are anticipated to occur due to the potential effects being temporary (2-3 days). On the basis that the potential effects will be temporary (2-3 days) and the information provided in the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the impact assessment within the ES.
4.11.8	Appendix 8.2 Traffic and Transportation Table A8.2.8	Traffic and Transport: Severance and pedestrian delay around rural work sites	The Inspectorate agrees that this matter can be scoped out of the assessment due to the very low likelihood of significant effects occurring due to any potential effects being temporary (2-3 days). On this basis, the Inspectorate agrees this matter can be scoped out of the impact assessment within the ES.
4.11.9	Appendix 8.2 Traffic and Transportation Table A8.2.8 and Paragraph A8.2.4.5	Traffic and Transport: Total traffic flows and Heavy Duty Vehicles (HDV) traffic flows in urban areas	The Traffic and Transportation Appendix proposes to scope out this matter as no significant effects are anticipated to occur due to the potential effects being temporary (2-3 days). However, the Scoping Report also identifies there may be increased congestion on the managed roads and other parts of the road network and at paragraph A8.2.4.7 states that significant effects may be generated for traffic flows. There is a lack of clarity with regards to the data presented in Table A8.2.5 and the Scoping Report also lacks information on the anticipated traffic flows and locations, displaced traffic effects, and cumulative effects. The ES should clearly present the predicted construction traffic movements for the Proposed Development and assess the likely significant effects associated with traffic flows, journey times and collisions and safety, on relevant receptors. The ES should also consider those aspect chapters and matters that are affected by the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			traffic and transport assessment. The Applicant should seek to agree the approach to the assessment with the relevant consultation bodies.
4.11.10	Appendix 8.2 Traffic and Transportation Paragraphs A8.2.4.5 and A8.2.4.6	Traffic and Transport: Journey times for cyclists in urban areas	The Traffic and Transportation Appendix proposed to scope out journey times for cyclists due to cyclist being less affected by queuing traffic and therefore no significant effects are anticipated to occur. The Inspectorate agrees that significant effects are unlikely and this matter can be scoped out of the impact assessment within the ES.
4.11.11	Appendix 8.2 Traffic and Transportation Table A8.2.8	Traffic and Transport: Severance and pedestrian delay around urban work sites	The Inspectorate agrees that this matter can be scoped out of the assessment due to the very low likelihood of significant effects occurring due to any potential effects being temporary (2-3 days). On this basis, the Inspectorate agrees this matter can be scoped out of the impact assessment within the ES.
4.11.12	Appendix 8.2 Traffic and Transportation Table A8.2.8 and Paragraph A8.2.1.2	Traffic and Transport: Operational effects	The Traffic and Transportation Appendix states that operational traffic is likely to be less than 1 vehicle per day. On this basis it is unlikely for significant effects to occur and the Inspectorate agrees this matter can be scoped out of the impact assessment within the ES.
4.11.13	Appendix	Noise: Baseline noise or vibration	The Scoping Report does not contain detailed information on the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	8.3: Noise and Vibration Paragraph A8.3.3.2 and Table A8.3.12	surveys at receptors along the pipeline route or relevant public highway routes	anticipated noise and vibration emissions and characteristics of the proposed upgrade/ modernisations of the Alton Pumping Station and new pumping station at Boorley Green. The ES should provide further information regarding the noise and vibration characteristics for these elements and demonstrate why a BS4142 assessment supported by baseline monitoring would not be required.
4.11.14	Appendix 8.3: Noise and Vibration Paragraphs A8.3.3.4 to A8.3.3.12 and Table A8.3.12	Noise: Effects arising from construction vehicle movements on public highways	As noted at point 4.11.9 above, there appears to be inconsistencies within the Traffic and Transport Appendix and therefore, the Inspectorate cannot agree to scope out noise and vibration effects at this stage. The ES should confirm the anticipated construction vehicle movements and present an assessment of noise and vibration effects of construction vehicle movements on sensitive receptors, where significant effects are likely to occur.
4.11.15	Appendix 8.3: Noise and Vibration Paragraphs A8.3.3.34 to A8.3.3.35 and Table A8.3.12	Noise: Effects arising from the operation of the pipeline, including normal pumping operation, commissioning, maintenance, and inspection	The Scoping Report does not provide a description of the likely works to upgrade and modernise the existing pumping station at Alton and the proposed pigging station at Boorley Green. Therefore, there is no indication as to whether there would be any changes to existing noise/ vibration levels at these locations. The ES should describe the works including the proposed upgrade/ modernisation works proposed for Alton Pumping Station and pigging station at Boorley Green. Where changes to noise and vibration emissions and characteristics may result in likely significant effects to sensitive human or ecological receptors, these should be assessed in the ES. The Inspectorate agrees that effects of noise and vibration as a result of the flow of fuel in the pipeline and the operation of valves can be scoped out of the ES on the basis of low likelihood of significant

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			effects.

ID	Ref	Other points	Inspectorate's comments
4.11.16	Appendix 7 Waste Technical Note paragraph A7.4.2	Waste: Transport of materials and waste	The Waste Technical Note has not demonstrated any cross reference between the transportation of materials and waste and the potential effects this may have on traffic, air quality and noise. An assessment describing the potential effects of transporting materials and waste to and from site should be included in the appropriate chapters within the ES, where these effects could be significant.
4.11.17	Appendix 7 Waste Technical Note paragraph A7.4.12	Waste: Watching brief	The Waste Technical Note states that further details on the watching brief are included within Chapter 4, and Chapter 11. However, no explanation of a watching brief is included within these chapters. The ES should contain this information where it has informed the identification of potential effects.
4.11.18	Appendix 8.1 Air Quality Paragraph A8.1.4.6	Demolition	The Air Quality Appendix states that no demolition activities are associated with the Proposed Development. However, paragraphs 12.4.2, 12.4.8, 12.4.14 and 12.4.21 of the Scoping Report all state that demolition of buildings may occur. The ES should include a full description of any demolition required and assess the potential significant effects.
4.11.19	Appendix 8.2 Traffic and Transportati	Traffic and Transport study area	No justification for using a 2km study area is included within the Scoping Report. The study area should be based on the anticipated extent of potential impacts. The Inspectorate advises that the Applicant makes effort to agree the extent of the study area with the

ID	Ref	Other points	Inspectorate's comments
	on Paragraph A8.2.3.1		relevant consultation bodies.
4.11.20	Appendix 8.2 Traffic and Transportation Paragraph A8.2.4.5	Traffic management strategy	The Air Quality Appendix states that the environmental impacts from temporary traffic signals lasting longer than one week will be mitigated by measures included within the traffic management strategy. The Applicant should seek to agree the traffic management strategy and the proposed mitigation measures with the relevant highway authorities and include the traffic management strategy within the ES.

5. INFORMATION SOURCES

5.0.1 The Inspectorate's National Infrastructure Planning website includes links to a range of advice regarding the making of applications and environmental procedures, these include:

- Pre-application prospectus[4]
- Planning Inspectorate advice notes[5]:
  - Advice Note Three: EIA Notification and Consultation;
  - Advice Note Four: Section 52: Obtaining information about interests in land (Planning Act 2008);
  - Advice Note Five: Section 53: Rights of Entry (Planning Act 2008);
  - Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements;
  - Advice Note Nine: Using the 'Rochdale Envelope';
  - Advice Note Ten: Habitat Regulations Assessment relevant to nationally significant infrastructure projects (includes discussion of Evidence Plan process);
  - Advice Note Twelve: Transboundary Impacts;
  - Advice Note Seventeen: Cumulative Effects Assessment; and
  - Advice Note Eighteen: The Water Framework Directive.

5.0.2 Applicants are also advised to review the list of information required to be submitted within an application for Development as set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009.

[4] The Planning Inspectorate's pre-application services for applicants. Available from: https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/

[5] The Planning Inspectorate's series of advice notes in relation to the Planning Act 2008 process. Available from: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES[6]

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	NHS North East Hampshire and Farnham Clinical Commissioning Group
	NHS West Hampshire Clinical Commissioning Group
	NHS North Hampshire Clinical Commissioning Group
	NHS North West Surrey Clinical Commissioning Group
	NHS Surrey Heath Clinical Commissioning Group
	NHS Hounslow Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Hampshire Fire and Rescue Service
	Surrey Fire and Rescue Service
	London Fire Bridgade
The relevant police and crime commissioner	Hampshire Police and Crime Commissioner
	Surrey Police and Crime Commissioners
	Metropolitan Police
The relevant parish council(s)	Alton Parish Council
	Bentley Parish Council
	Binsted Parish Council
	Bishops Waltham Parish Council
	Botley Parish Council
	Bramdean and Hinton Ampner Parish Council
	Chawton Parish Council
	Chobham Parish Council

[6] Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Church Crookham Parish Council
	Crondall Parish Council
	Durley Parish Council
	East Tisted Parish Council
	Ewshot Parish Council
	Exton Parish Council
	Farringdon Parish Council
	Fleet Parish Council
	Four Marks Parish Council
	Froyle Parish Council
	Kilmiston Parish Council
	Newton Valence Parish Council
	Ropley Parish Council
	Upham Parish Council
	Warnford Parish Council
	West End Parish Council
	West Tisted Parish Council
	Windlesham Parish Council
	Worldham Parish Council
The Environment Agency	Environment Agency
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Hampshire County County Highways Authority
	Surrey County Council Highways Authority
The relevant strategic highways company	Highways England
Transport for London	Transport for London
Public Health England, an executive agency of the Department of Health	Public Health England
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	Forestry Commission
The Secretary of State for Defence	Ministry of Defence

TABLE A2: RELEVANT STATUTORY UNDERTAKERS[7]

STATUTORY UNDERTAKER	ORGANISATION
The relevant Clinical Commissioning Group	NHS West Hampshire Clinical Commissioning Group

[7] 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
	NHS North East Hampshire and Farnham Clinical Commissioning Group
	NHS North Hampshire Clinical Commissioning Group
	NHS Surrey Heath Clinical Commissioning Group
	NHS North West Surrey Clinical Commissioning Group
	NHS Hounslow Clinical Commissioning Group
The National Health Service Commissioning Board	NHS England
The relevant NHS Trust	London Ambulance Service NHS Trust
The relevant NHS Foundation Trust	Ashford and St. Peter's Hospital NHS Foundation Trust
	South Central Ambulance Service NHS Foundation Trust
	South East Coast Ambulance Service NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd
	Highways England Historical Railways Estate
Road Transport	Transport for London
Canal Or Inland Navigation Authorities	Hampshire County Council and Surrey County Council (as statutory undertakers in respect of Basingstoke Canal)
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	Environment Agency
The relevant water and sewage undertaker	Affinity Water
	Portsmouth Water
	South East Water (Mid Kent)
	Southern Water
	Sutton and East Surrey Water
	Thames Water
The relevant public gas transporter	Cadent Gas Limited
	Energetics Gas Limited
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	ESP Connections Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited

STATUTORY UNDERTAKER	ORGANISATION
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Quadrant Pipelines Limited
	National Grid Gas Plc
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
The relevant electricity distributor with CPO Powers	Energetics Electricity Limited
	Energy Assets Networks Limited
	Energy Assets Power Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	G2 Energy IDNO Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Leep Electricity Networks Limited
	Murphy Power Distribution Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	Utility Distribution Networks Limited
	South Eastern Power Networks Plc
	Southern Electric Power Distribution Plc
	UK Power Networks Limited
	National Grid Electricity Transmission Plc

TABLE A3: SECTION 43 CONSULTEES (FOR THE PURPOSES OF SECTION 42(1)(B))[8]

LOCAL AUTHORITY[9]
Basingstoke and Deane Borough Council
Bracknell Forest Borough Council
Chichester District Council

[8] Sections 43 and 42(B) of the PA2008

[9] As defined in Section 43(3) of the PA2008

LOCAL AUTHORITY[9]
Dorset County Council
East Hampshire District Council
East Sussex County Council
Eastleigh Borough Council
Elmbridge Borough Council
Fareham Borough Council
Guildford Borough Council
Hampshire County Council
Hart District Council
Havant Borough Council
Kent County Council
London Borough of Bromley
London Borough of Croydon
London Borough of Ealing
London Borough of Hammersmith and Fulham
London Borough of Hillingdon
London Borough of Hounslow
London Borough of Richmond
London Borough of Sutton
New Forest District Council
New Forest National Park
Portsmouth City Council
Runneymede Borough Council
Rushmoor Borough Council
Slough Borough Council

LOCAL AUTHORITY[9]
South Downs National Park
Southampton City Council
Spelthorne Borough Council
Surrey County Council
Surrey Heath Borough Council
Test Valley Borough Council
The Royal Borough of Kingston Upon Thames
The Royal Borough of Windsor and Maidenhead
Waverley Borough Council
West Berkshire Council
West Sussex County Council
Wiltshire County Council
Winchester City Council
Woking Borough Council
Wokingham Borough Council

THE GREATER LONDON AUTHORITY

ORGANISATION
The Greater London Authority

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

Consultation bodies who replied by the statutory deadline:

Basingstoke and Deane Borough Council
Bracknell Forest Borough Council
Cadent Gas
Chobham Parish Council
Crondall Parish Council
Elmbridge Borough Council
Environment Agency
ESP Utilities Group
Fareham Borough Council
Forestry Commission
Froyle Parish Council
Hampshire County Council
Havant Borough Council
Highways England
Historic England
HSE (Health and Safety Executive)
Kent County Council
London Borough of Croydon
Ministry of Defence (MoD)
National Grid
New Forest District Council
Portsmouth Water

Public Health England
Royal Mail
Runnymead Borough Council
Rushmoor Borough Council
South Downs National Park Authority
Spelthorne Borough Council
Surrey County Council
Surrey Heath Borough Council
Thames Water
Transport for London
Waverley Borough Council
West End Parish Council
Woking Borough Council

Basingstoke and Deane Borough Council
Civic Offices, London Road,
Basingstoke, Hampshire RG21 4AH
www.basingstoke.gov.uk | 01256 844844
customer.service@basingstoke.gov.uk
Follow us on @BasingstokeGov

Ms M Shoesmith

Our Ref: 18/02197/EN10 06 August 2018
Your Ref:

Dear Ms Shoesmith,

Location: Southampton To London Pipeline
Proposal: Pipeline - EIA Scoping Notification and Consultation

Thank you for your consultation dated 27 July 2015.

The planned Southampton to London pipeline does not go through any part of the Basingstoke and Deane Borough and therefore Basingstoke and Deane Borough Council do not have any comment to make.

If you have any queries or require further information, please do not hesitate to contact Ruth Triebsch on 01256 845311 or email ruth.triebsch@basingstoke.gov.uk

Yours sincerely

[redacted]

Planning and Development Manager

Marie Shoesmith
Major Casework Directorate
2 The Square
Bristol
BS1 6PN

6th August 2018

Consultation Response

Dear Sir/Madam

Town and Country Planning Act 1990

REFERENCE:	18/00010/OBS/OBSZ
DESCRIPTION:	Request for observations on a scoping opinion under Regulations 10 and 11 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
LOCATION:	Southampton To London Pipeline
CASE OFFICER:	Trevor Yerworth, direct line 01344 351182

I refer to your consultation on the above application received on 31st July 2018. My comments are;

01. Thank you for consulting Bracknell Forest Council (BFC) on a Scoping Report prepared for Esso Petroleum Ltd. in respect of a replacement aviation fuel pipeline between the Fawley Refinery to the West London Terminal storage facility in Hounslow.

BFC does not wish to comment on this Scoping Report.

Should you wish to discuss this matter further, please do not hesitate to contact me.

Yours faithfully

Trevor Yerworth

Principal Planning Officer
Environment, Culture & Communities Department
email trevor.yerworth@bracknell-forest.gov.uk
Direct Line 01344 351182

Cadent Gas Limited
Ashbrook Court, Prologis Park
Central Boulevard
Coventry CV7 8PE
cadentgas.com

By email to:
SouthamptontoLondonPipeline@pins.gsi.gov.uk

Cadent
Your Gas Network

Southampton to London Pipeline Project - EIA Scoping Notification and Consultation

This is a response on behalf of Cadent Gas Limited (Cadent).

I refer to your email dated 27th July 2018 regarding the proposed Esso Southampton to London Pipeline DCO. Cadent has reviewed the scoping information and wishes to make the following comments:

In respect of existing Cadent infrastructure, Cadent will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus,

Cadent Infrastructure within or in close proximity to the Proposed Order Limits

Cadent has identified the following apparatus within the vicinity of the proposed works:

- Above ground installations and sites
- High and Intermediate pressure (above 2 bar) Gas Pipelines and associated equipment
- Low and Medium pressure (below 2 bar) gas pipes and associated equipment. (As a result it is highly likely that there are also gas services and associated apparatus in the vicinity)

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of Cadent's apparatus, Cadent will require appropriate protection and further discussion on the impact to its apparatus and rights including adequate Protective Provisions

Where diversions are required, the Promoter should engage with Cadent at the earliest opportunity to ensure that feasibility studies can be undertaken within adequate timescales. Adequate land and consents requirements to faciliatiate such works should be considered

Key Considerations:

- Cadent has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.

Pipeline Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at previously agreed locations.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.
- The type of raft shall be agreed with Cadent prior to installation.

- No protective measures including the installation of concrete slab protection shall be installed over or near to the Cadent pipeline without the prior permission of Cadent.
- Cadent will need to agree the material, the dimensions and method of installation of the proposed protective measure.
- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to Cadent.
- Please be aware that written permission is required before any works commence within the Cadent easement strip.
- A Cadent representative shall monitor any works within close proximity to the pipeline.
- A Deed of Consent is required for any crossing of the easement

New Service Crossing:

- New services may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- A new service should not be laid parallel within an easement
- A Cadent representative shall supervise any new service crossing of a pipeline. Any exposed pipeline should be suitably supported and removed prior to backfilling
- An exposed pipeline should be suitable supported and removed prior to backfilling
- An exposed pipeline should be protected by matting and suitable timber cladding
- For pipe construction involving deep excavation (<1.5m) in the vicinity of grey iron mains, the model consultative procedure will apply therefore an integrity assessment must be conducted to confirm if diversion is required
- A Deed of Consent is required for any new service crossing the easement.
- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and Cadent's specification for Safe Working in the Vicinity of Cadent High Pressure gas pipelines and associated installations - requirements for third parties T/SP/SSW22. Digsafe leaflet Excavating Safely - Avoiding injury when working near gas pipes
- Cadent will also need to ensure that our pipelines access is maintained during and after construction.
- The actual depth and position must be confirmed on site by trial hole investigation under the supervision of a Cadent representative. Ground cover above our pipelines should not be reduced or increased.
- If any excavations are planned within 3 metres of Cadent High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a Cadent representative. A safe working method agreed prior to any work taking

place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

- Excavation works may take place unsupervised no closer than 3 metres from the pipeline once the actual depth and position has been has been confirmed on site under the supervision of a Cadent representative. Similarly, excavation with hand held power tools is not permitted within 1.5 metres from our apparatus and the work is undertaken with NG supervision and guidance.

- The above guidance is not exhaustive and your works proposals must always be submitted to Cadent's Plant Protection department in advance of commencement of works on site.

Yours Faithfully

[redacted]

Vicky Stirling

Land & Property Services

Continuation sheet.

Guidance

To download a copy of the HSE Guidance HS(G)47, please use the following link:

http://www.hse.gov.uk/pubns/books/hsg47.htm

Dial Before You Dig Pipelines Guidance:

https://cadentgas.com/Digging-safely/Dial-before-you-dig

Essential Guidance document:

https://cadentgas.com/getattachment/Digging-safely/Work-safely-library/Promo-Essential-guidance/Essential_Guidance.pdf

Excavating Safely in the vicinity of gas pipes guidance (Credit card):

https://cadentgas.com/getattachment/Digging-safely/Work-safely-library/Promo-Excavating-safely-credit-card-gas/Excavating_Safely_Leaflet_Gas-1.pdf

Copies of all the Guidance Documents can also be downloaded from the National Grid Website:

https://cadentgas.com/Digging-safely/Work-safely-library

From:	Clerk
To:	Southampton to London Pipeline Project
Subject:	Southampton to London Pipeline - EIA Scoping Notification and Consultation
Date:	23 August 2018 08:56:43
Attachments:	clerk.vcf

Dear Sir/Madam,

Chobham Parish Council thank the Planning Inspectorate for the opportunity to comment on the Environmental Statement relating to the proposed replacement Esso pipeline.

I confirm Chobham Parish Council does not have any comments regarding the information provided for the Environmental Statement.

Regards,

Annette Barber
Parish Clerk
Chobham Parish Council, Chobham Parish Pavilion, Recreation Ground, Station Road, Chobham, Surrey GU24 8AJ.
Tel 01276 856633
Email clerk@chobhamparishcouncil.org
Website www.chobhamparishcouncil.org
Please note the office is staffed Mondays,Tuesdays, Wednesdays and Thursdays, 09.00-15.00. The public are welcome to visit the Office on Wednesday 10.00-12.00.

-->

Crondall
Parish Council

Crondall Parish Council
PO Box 623
Farnham
Surrey
GU9 1HB

Contact: Mary Harris
Telephone: [redacted]
e-mail: clerk@crondall-pc.gov.uk

Date: 20th August 2018

By E-Mail

Mr Michael Breslaw
EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate
Temple Quay House, Temple Quay
Bristol, BS1 6PN

Dear Mr Breslaw

Southampton to London Pipeline - EIA Scoping Notification and Consultation

Crondall Parish Council has conducted a brief review of the extensive EIA Scoping Report and offers the following comments.

- Fig 3.2, sheet 8 (and section 4.5):
  - Routing around Crondall should be the eastern option of the two options shown.
  - It's not clear what the extra areas designated purple on Dippenhall Road (east side) are for.
  - There are several anomalies, such as an apparent branch pipe towards Combe Wood, just N of the A287, as well as the strange anomaly just by Crondall Lane after the change from section C (red) and D (blue).
- Section 4.5: The opportunity to re-route avoiding the highly developed centre of Farnborough and linking into the sparsely developed area around the south of Farnborough Airport (while also improving fuel delivery to the airport- cutting down the number of tankers on the roads) is an opportunity that should be taken.
- Section 4.7.29+: The Parish Council should have an opportunity to be consulted on the detailed route as it crosses the Parish and ensure any key features on the ground are protected, the specific route will be known in autumn 2019.
- Section 4.7.59: The contractor should liaise with Parish Councils as this is the best method of promulgating information to local people. This should include notice of closure of footpaths (of which many cross the proposed route).
- Section 4.7.60: In relation to the VERY narrow streets of Crondall parish (especially Crondall village), construction traffic routes will need to be extremely carefully planned. Smaller (7.5T max) lorries are recomemned.
- Table 5.2: There is no specific meeting planned with Crondall Parish Council and we therefore request one.
- Table 11.14: Some soils will be more prone to distributing fuel leaks than others. This should be a material consideration for route selection and effects duration operation and scoped "in".
- Section A2.3.16: Crondall (within Hart) will shortly have a Neighbourhood Plan which will designate sites, but this is unlikely to impinge on the proposed routing options.

We are very happy to discuss these comments further.

Yours sincerely

Chris Dorn, Chairman *on behalf of the Clerk who is on leave*

PP **Mary C Harris**

Clerk to Crondall Parish Council
Cc Esso Pipeline Project Team

Elmbridge Borough Council
... bridging the communities ...

NO OBJECTION
Application No: **2018/2352**
Type: Consultation - Scoping Opinion

The Planning Inspectorate
Marie Shoesmith
Senior EIA and Land Rights Advisor
Major Casework Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

TOWN & COUNTRY PLANNING ACT 1990

NO OBJECTION

Proposal:	**Consultation from The Planning Inspectorate: EIA Scoping request relating to an application for an Order granting Development Consent for the Southampton to London Pipeline (PINs Ref: EN070005_000008_270718).**
Applicant:	**The Planning Inspectorate**
Location:	**Southampton to London Pipeline**

The decision of Elmbridge Borough Council on the proposal received as valid by the Council on 27/07/2018 and described above is **No Objection**.

[redacted]
Kim Tagliarini
Head of Planning Services

Date: 14 August 2018

NB: THE ATTENTION OF THE APPLICANT AND AGENT IS DRAWN TO THE ATTACHED NOTES WHICH PROVIDE IMPORTANT INFORMATION RELATING TO EITHER THE GRANT OR REFUSAL OF THIS APPLICATION

The above decision makes reference to the Core Strategy and the Development Management Plan. Should you wish to read the wording and content of any of these policies, the documents can be viewed online at **elmbridge.gov.uk/planning/local-plan** or in our reception at the Civic Centre, High Street, Esher, Surrey, KT10 9SD

Application No:	2018/2352	**Application Type:**	CSO
Case Officer:	Steve Elliott	**Ward:**	Adj Neighbouring Authority
Location:	Southampton to London Pipeline		
Proposal:	Consultation from The Planning Inspectorate: EIA Scoping request relating to an application for an Order granting Development Consent for the Southampton to London Pipeline (PINs Ref: EN070005_000008_270718).		
Applicant:	The Planning Inspectorate		
Agent:			

Representations: None

R e p o r t

Description

1. This application is a consultation from The Planning Inspectorate relating to an application for an Order granting Development Consent for the Southampton to London Pipeline.

2. **No Relevant Planning History**

Proposal

3. This is a consultation from The Planning Inspectorate relating to an application for an Order granting Development Consent for the Southampton to London Pipeline (PINs Ref: EN070005_000008_270718).

Planning Considerations

4. The proposed route of the pipeline does enter the borough of Elmbridge at any point. The route at its closest point will be in excess of 1.8km away from the Elmbridge borough boundary. As a result, this proposal would have no impact on the borough of Elmbridge.

5. It is for the Planning Inspectorate as the determining authority to consider the environmental impact of the proposal. As such, no objection is raised.

Matters raised in Representations

6. None.

Conclusion

7. The proposal is not considered to cause any harm to the borough of Elmbridge and accordingly no objection is raised.

Elmbridge Borough Council

Issuing of Planning Decisions Under Scheme of Delegation Adopted April 2008

Case Officer Recommendation: Steve Elliott

Recommendation Agreed:

[redacted]

Paul Falconer
Development Manager

for Strategic Director
Date: 14 August 2018

Ms Marie Shoesmith
The Planning Inspectorate
Major Casework Directorate
Temple Quay House (2 The Square)
Temple Quay
Bristol
Avon
BS1 6PN

Our ref: HA/2018/120603/01-L01
Your ref: EN070005_000008_270718
Date: 24 August 2018

Dear Ms Shoesmith,

APPLICATION BY ESSO PETROLEUM COMPANY LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE SOUTHAMPTON TO LONDON PIPELINE PROJECT.

Thank you for your consultation on the Scoping Opinion for the proposed Esso pipeline.

We have reviewed the documents and it is our opinion that the following information should be provided in the Environmental Statement:

Please note that the following acronyms used in this Scoping Opinion are listed in the table below:

CEMP	Construction Environmental Management Plan
EIA	Environmental Impact Assessment
FRA	Flood Risk Assessment
NPPF	National Planning Policy Framework
REAC	Register of Actions and Commitments
SAC	Special Area of Conservation
SPA	Special Protection Areas
SPZ	Source Protection Zone (relating to groundwater)

Chapter 3 - Section 3.6.6

There should be reference in this section to ensure screening mesh is installed on any over pumping (to prevent fish and eels from becoming entrained). Biosecurity should also be mentioned here as there is potential for contaminated equipment to move around between river catchments.

Any temporary watercourse crossings will have uninterrupted flows. This section should also state that any migratory passage both upstream and downstream for fish (such as salmonids and eel) will also be uninterrupted. This needs to be considered again in section 3.11.6 which provides some detail on the use of flumes/pipes installed into the

bed of the watercourse to take the flow. This use of flumes/pipes may be unsuitable for migratory fish because they may impede or block migration.

Chapter 3 - Section 3.6.20

Comments from a flood risk perspective

We require confirmation of the pipeline crossing technique to be used at Ford Lake Stream. Section 3.6.20 of Volume 1 of the scoping report states that watercourses will typically be crossed with an open cut technique, with the exception of major watercourse crossings such as Basingstoke Canal and the River Thames which require trenchless techniques. The scoping report classifies Ford Lake Stream as a having a Medium fluvial geomorphology sensitivity/value (Table 8.11) and a Medium flood risk sensitivity (Table 8.12). In addition, Ford Lake Stream is designated a "Main River" by the Environment Agency. The use of a trenchless installation technique would therefore be the preferred installation method for Ford Lake Stream as this is the least disruptive method for providing new pipeline crossings under a watercourse. If an open cut technique were to be chosen as the preferred option, the Environmental Statement and CEMP would need to provide sufficient evidence and mitigation to convince us of negligible impact on the watercourse. The REAC would need to include a mitigation commitment to reinstate the bed and banks of the watercourse to the condition they were in before the activities commenced, within a suitable timeframe agreed with the Environment Agency.

In light of the above, we agree that the following issue should be scoped in to the assessment:

- *Changes to morphological processes and features as a result of open cut crossings at Medium and High sensitivity fluvial geomorphology receptors.*

We are also pleased to see that the changes to morphological processes and features as a result of haul road crossings and culverts in the channel have been scoped in. Environment Agency policy is that no watercourse should be culverted unless there is an overriding need to do so. Culverting introduces an increased risk of blockage (with consequent increase in flood risk). An environmental risk assessment to determine the most appropriate haul road crossing design will be required for the Environmental Permit.

We agree that a FRA should be prepared for areas where there is the greatest risk of flooding. The FRA for Ford Lake Stream should be used to assess the potential impacts of the proposals on flood risk and identify the mitigation measures necessary to address any increase in risk.

Comments from a biodiversity protection perspective

It has been identified that crossings will be generally open cut, but section 3.6.21 states crossing locations will be assessed individually. Our preferred method is a trenchless construction under watercourses and wetlands. This is particularly important where there are migratory fish and/or eels present. Removal of the bed and banks of watercourses can be very damaging, in particular due to the removal of bank side trees and in-stream woody material. The management of flood flows must be carefully planned for. If a flood overtopped a coffer dammed section and washed out the working area this could have severe impacts for the river in the form of pollution from scoured sediment and building materials.

Cont/d..

We request consultation on every watercourse. The Scoping Report discusses wetlands and suggests that the route has been modified to avoid most wetland environments, in particular the most sensitive.

Chapter 3 - Sections 3.11.6-8

The impacts of any flume pipe on migratory fish and/or eels must be considered. Likewise, the flume pipe must be designed in a way to minimise scouring, and the entrainment of fish and shooting them through the pipe at high velocity. Cofferdams and over pumping may be more suitable in some locations. Open trench and cofferdam sections may require consent from the Environment Agency to remove and relocate fish trapped in these sections.

Chapter 3 - Sections 3.11.9, 3.11.11 & 3.11.14

The noise impacts on fish of each of these trenchless methods will need to be assessed.

Chapter 4 - Sections 4.7.18-19

We agree this is the right approach and that further pre-construction surveys will be used to revise the CEMP.

Chapter 4 - Section 4.7.20

We agree that working widths along watercourses should be kept to a minimum and below 10 metres. Remaining works, roads or compounds near watercourses should be protected with a minimum of an 8 metre buffer zone.

Chapter 4 - Section 4.7.21

We agree that timing restrictions for fish and eels are to be decided on a case by case basis, and after the crossing methodology is agreed. Timing restrictions will be unique for each site due to different species assemblages and site specific requirements.

Chapter 4 - Sections 4.7.18 & 19

We agree that pre-construction surveys should be used to revise the CEMP.

Chapter 4 - Section 4.7.20

We agree that working widths along watercourses should be kept to a minimum and below 10 metres.

Chapter 4 - Section 4.7.21

We agree that timing restrictions for migratory fish (eels and salmonids) are to be agreed once it is confirmed which methods are to be used on each watercourse. These timing restrictions are likely to be watercourse specific.

Chapter 4 - Sections 4.7.22-25

We agree that these measures should be implemented.

Cont/d..

Chapter 7 - Section 7.2.6

There is a new NPPF (published in July 2018) and therefore these paragraphs require revising.

Chapter 7 - Section 7.3.8

We support further details field surveys and desk studies to be undertaken in 2018. In particular, we support further surveys to determine the baseline assessment of bats, otter, water vole, aquatic flora and fauna, aquatic ecology, reptiles and amphibians (including great crested newt).

Chapter 7 - Table 7.5

The table identifies 'fish and other aquatic fauna'. Does this include water vole and otter? If not, these need to be included in 'mortality and injury' and also 'habitat loss' columns.

Chapter 7 - Table 7.7

We agree with the inclusions/exclusions detailed in the comments box, except that for fish and aquatic species. We do not agree that 'mortality and injury' and 'disturbance' can be scoped out of the EIA at this stage. Section 7.4.195 states that good practice mitigation would be implemented and we support this. However, until we have details/understand and agree these good practice measures we are unable to support scoping this out of the EIA.

Chapter 8

This chapter clearly defines what is proposed to be scoped in and out of the EIA. We are pleased to see that construction effects on fluvial geomorphology has been scoped into the EIA for medium and high receptors and areas crossed by access tracks/haul roads.

We do not agree that areas in Flood Zone 2 should be scoped out of the EIA. At this scoping stage, and without clear details of the construction proposals, it is difficult to assess what the level of risks could be in Flood Zone 2.

There could potentially be a significant impact on fluvial flood risk caused by construction in Flood Zone 2, and this needs to be reflected within the EIA.

In addition, any FRA produced as supporting evidence for the EIA will need to assess the impact on Flood Zone 2, and therefore it makes logical sense to include it within the EIA.

The chapter states that *'for areas where there is the greatest risk of flooding a flood risk assessment will be produced'*. We have no concerns with focusing in greater detail at specific elements of the proposal. However, an overarching FRA will need to be produced in support of the scheme as a whole.

Chapter 8 - Table 8.13

We would seek clarification on the sensitivity classification in Table 8.13 in Chapter 8.

Cont/d..

Whilst principal aquifers and groundwater SPZ1 have been given a ‘high’ sensitivity value, SPZ2 has been given a sensitivity value of ‘medium’ with SPZ3 a value of ‘low’. We find this surprising especially given that the proposed pipeline will run close to a SPZ1/SPZ2 boundary for a public water supply. Whilst we appreciate that, as shown in table 8.15 leaks of aviation fuel in principal aquifers, secondary A aquifers and SPZs have been scoped in, we would like to understand why SPZ2 and SPZ3 have been given a medium and low sensitivity value in the report.

We understand that the pipeline will not be installed in SPZ1 and we are pleased that the preferred route avoids them. Where installing the pipeline in SPZ 2, 3 or a principal aquifer is unavoidable, we expect risk assessments to be taken prior to carrying out the works to ensure that appropriate pollution prevention measures are taken and incorporated into the design of the pipeline.

The applicant will need to demonstrate how groundwater will be protected during the installation of the pipeline and throughout its lifetime. We are satisfied that this has either been scoped in or will be addressed through mitigation measures.

Appendix 4

We agree with the conclusions of the Habitat Regulations Assessment screening for the following sites:

- Solent & Southampton Water SPA
- Solent & Southampton Water Ramsar
- Solent Maritime SAC

Appendix 4 - Sections 5.1.1-4

We agree with the conclusions in this section, and support Stage 2 assessment of Thursley, Ash, Pirbright and Chobham SAC.

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours sincerely,

Mrs Charlotte Lines
Senior Planning Advisor

Direct dial: 02084 745838
Email: PlanningSSD@environment-agency.gov.uk

End

PRECAUTIONS TO BE TAKEN WHEN CARRYING OUT WORK IN THE VICINITY OF ELECTRICITY CABLES

ADVICE TO SITE PERSONNEL

MANAGEMENT NOTE

Please ensure that a copy of this note is read by your site management and to your site operatives.

Early consultation with ESP Utilities Group prior to excavation is recommended to obtain the location of plant and precautions to be taken when working nearby.

This Guidance Note should be read in conjunction with the Health and Safety Executive guidance HSG47 "Avoiding danger from underground services".

1.0 Introduction

This procedure should be read in conjunction with the ESP Electricity Distribution Safety Rules and other relevant procedures.
The object of this procedure is:

a) To lay down the rules for the location of cable before work is started.

b) To specify the safe working procedure to be adopted by persons who have to work on or in the vicinity of cables.

2.0 Reference

ESP Electricity G81 – Design and Planning
ESP Electricity G81 – Installation and Records
National Joint Utilities Group (NJUG) Guidance Notes
Avoiding danger from underground services HSG47 HSE Advice Booklet.

3.0 Work

3.1 All cables and apparatus to which the cables are connected shall be treated as being live, until they have been proved dead and all points of isolation have been establish and controlled.

3.2 All work carried out under this procedure shall also be carried out in strict accordance with the ESP Electricity Distribution Safety Rules and other relevant procedures.

3.3 For the purpose of this procedure:

a) Work on a cable includes the intentional cutting or removal of its Sheath or Armour, cutting of its core(s) or conductor(s) and the removal of a spiking gun.

b) Work in the vicinity of a cable includes digging or any activity carried out at any work location where cables are or may be present, whether or not for the specific purpose of preparation for work on a cable.

4.0 Cable Locating Devices

4.1 An approved cable locating device is to be used on every occasion before any surface is removed or any digging is started. It must also be used during the course of any digging work.

4.2 Cable location devices provide information on the position of cables. They must not be used as the only means of cable location.

4.3 Cable locating devices must be regularly checked for correct operation.

All persons using cable locating devices must be adequately trained in their use and must be Competent Persons.

5.0 Location of Cables

5.1 The depth of underground cables varies greatly. It is essential that a site specific risk assessment is undertaken for the proposed work you are planning this must include obtaining an up-to-date map of the electricity cables in the area and to make use of it. The electricity cable records must be checked before any work is started. Changes in surface level or reference points, and work carried out by other people may affect the reliability of these records. Anybody excavating must be told of these possibilities.

5.2 Before the start of any excavation work, a cable locating device shall be used to establish the run of live cables. Reasonable steps should be taken to establish the runs of cables both along and across the length of the intended area of digging. The cable avoidance tool shall be used together with mains records and where provided, service records.

5.3 All cable runs either confirmed by use of the cable locating device or indicated on the mains records must be marked out on the surface using a waterproof marker. Marked cable runs must be extended 300mm beyond either end or side of the intended digging area, and must stay visible while the digging is going on. The trial hole dig method can be used to identify the run of cables using hand dig tools only.

6.0 Precautions to be Taken while Working in Vicinity of Cables

6.1 Work in the vicinity of cables must be carried out as if the cables are live and all excavation work must be personally supervised by a Competent Person. All persons shall wear a minimum of safety footwear, Safety Glasses, hard hat, Task Specific Gloves flame retardant overalls.

6.2 Approved hand tools should always be used in preference to power tools in the vicinity of cables, unless site conditions make this impracticable. Spades should always be used in preference to forks. Extreme care must always be taken when using a fork or pick. Forks must be of approved type with shortened chisel ended tines. Spades must have sharp corners of the blade rounded. The selection of a fork or pick will be assessed on a Task Specific Risk Assessment.

6.3 A proprietary air digging tool, which removes oil with a high-velocity jet of air, can be used to expose buried services without damage to the service. However, it will not penetrate asphalt, concrete or frozen ground. Also precautions need to be taken that will prevent injury to the operator and members of the public from ejected soil and other materials.

6.4 When site conditions require the use of hand held power tools they must be fitted with a short bit. The following method of work must be used:

a) Using all the information provided, together with an approved cable locating device, the line of all know cables must be marked out at least 300mm past the hole that will be dug using waterproof marker.

b) Encroachment lines must be drawn 300mm parallel to and away from the outer and innermost cable marker lines. And as in (a) above these must be drawn to extend at least 300mm beyond the edge of the hole that will be dug.

c) Hand held power tools must not be used below ground level in between the encroachment lines. Hand tools must be used for progressive and careful undermining from outside the encroachment lines towards the cable(s). Hand power tools must only be used to break up any hard surface, keeping pace with, but not going past the undermining. Extreme care must, in particular, be exercised when using power tools above cables already exposed by undermining. The use of power tools must stop if at any time the cutting rate quickens, indicating softer ground. At all times, attention must be paid to the cable run marker lines outside the edges of the holes.

d) The safe digging procedure in (c) above must be followed until all cable(s) required for work or for identification have been located.

e) If all recorded or detected cables inside the digging area have been located then hand held power tools may be used below ground level to break up concrete or similar structures, but even then only when site conditions render the use of hand tools impractical.

6.5 During excavation, full use must be made of cable locating devices which must be used to assist in establishing the exact location of live cables.

6.6 Where exposed cables are likely to be damaged in any way they shall be adequately protected and/or supported. Where in the opinion of the person in charge on site it is appropriate, warning notices must be attached to cables e.g. ‘live cable exposed above ground level’ or ‘live coiled cables’.

6.7 Irrespective of the color of the electricity cable it shall be considered as being in a ‘live’ status unless it has been confirmed and proven that the cable has been physically isolated or turned off.

If damage is caused or suspected the following action should be taken at once:

- Remove all personnel from the immediate vicinity
- Contact ESP Electricity 01372 587500 or out of hours Emergency contact Number 0800 731 6945
- Prevent any approach by the public.
- Assist electricity personnel, Police or Fire Service as requested.

REMEMBER – IF IN DOUBT; SEEK ADVICE FROM ESP Utilities Group.

ESP Utilities Group can be contacted at:

Office Address: Bluebird House, Mole Business Park, Leatherhead, Surrey, KT22 7BA

Office Tel: 01372 587 500**; Fax:** 01372 377996

PRECAUTIONS TO BE TAKEN WHEN CARRYING OUT WORK IN THE VICINITY OF UNDERGROUND GAS PIPES

ADVICE TO SITE PERSONNEL

MANAGEMENT NOTE

Please ensure that a copy of this note is read by your site management and to your site operatives.

Early consultation with ESP Utilities Group prior to excavation is recommended to obtain the location of plant and precautions to be taken when working nearby.

This Guidance Note should be read in conjunction with the Health and Safety Executive guidance HSG47 "Avoiding danger from underground services".

Introduction

Damage to ESP Utilities Group's plant can result in uncontrolled gas escapes which may be dangerous. In addition these occurrences can cause expense, disruption of work and inconvenience to the public.

Various materials are used for gas mains and services. Cast Iron, Ductile Iron, Steel and Plastic pipes are the most widely found. Modern Plastic pipes are either bright yellow or orange in colour.

Cast Iron and Ductile Iron water pipes are very similar in appearance to Cast Iron and Ductile Iron gas pipes and if any Cast Iron or Ductile Iron pipe is uncovered, it should be treated as a gas pipe. ESP Utilities Group do not own any metallic gas pipes but their gas network infrastructures may be connected to Cast Iron, Ductile Iron or Steel pipes owned by Distribution Network Operators.

The following general precautions apply to Intermediate Pressure (2-7barg MOP), Medium Pressure (75mbarg-2barg MOP), Low Pressure (up to 75mbarg MOP) and other gas mains and services likely to be encountered in general site works and are referred to within this document as '**pipes**'.

Locating Gas Pipes

It should be assumed when working in urban and residential areas that gas mains and services are likely to be present. On request, ESP Utilities Group will give approximate locations of pipes derived from their records. The records do not normally show the position of service pipes but their probable line can be deducted from the gas meter position. ESP Utilities Group's staff will be pleased to assist in the location of gas plant and provide advice on any precautions that may be required. The records and advice are given in good faith but cannot be guaranteed until hand excavation has taken place. Proprietary pipe and cable locators are available although generally these will not locate plastic pipes.

Safe working Practices

To achieve safe working conditions adjacent to gas plant the following must be observed:

Observe any specific request made by ESP Utilities Group's staff.

Gas pipes must be located by hand digging before mechanical excavation. Once a gas pipe has been located, mechanical excavation must proceed **with care**. A mechanical excavator must not in any case be used within 0.5 metre of a gas pipe and greater safety distances may be advised by ESP Utilities Group depending on the mains maximum operating pressure (MOP).

Where heavy plant may have to cross the line of a gas pipe during construction work, the number of crossing points should be kept to a minimum. Crossing points should be clearly indicated and crossings at other places along the line of the pipe should be prevented.

Where the pipe is not adequately protected by an existing road, crossing points should be suitably reinforced with sleepers, steel plates or a specially constructed reinforced concrete raft as necessary. ESP Utilities Group staff will advise on the type of reinforcement necessary.

No explosives should be used within 30 metres of any gas pipe without prior consultation with ESP Utilities Group.

ESP Utilities Group must be consulted prior to carrying out excavation work within 10 metres of any above ground gas installation.

Where it is proposed to carry out piling or boring within 15 metres of any gas pipe, ESP Utilities Group should be consulted prior to the commencement of the works.

Access to gas plant must be maintained at all times during on site works.

Proximity of Other Plant

A minimum clearance of 300 millimetres (mm) should be allowed between any plant being installed and an existing gas main to facilitate repair, whether the adjacent plant be parallel to or crossing the gas pipe. No apparatus should be laid over and along the line of a gas pipe irrespective of clearance.

No manhole or chambers shall be built over or around a gas pipe and no work should be carried out which results in a reduction of cover or protection over a pipe, without consultation with ESP Utilities Group.

Support and Backfill

Where excavation of trenches adjacent to any pipe affects its support, the pipe must be supported to the satisfaction of ESP Utilities Group and must not be used as an anchor or support in any way. In some cases, it may be necessary to divert the gas pipe before work commences.

Where a trench is excavated crossing or parallel to the line of the gas pipe, the backfill should be adequately compacted, particularly beneath the pipe, to prevent any settlement which could subsequently cause damage to the pipe.

In special cases it may be necessary to provide permanent support to the gas pipe, before backfilling and reinstatement is carried out. Backfill material adjacent to gas plant must be selected fine material or sand, containing no stones, bricks or lumps of concrete, etc., placed to a minimum depth of 150mm around the pipes and well compacted by hand. No power compaction should take place until 300mm of selected fine fill has been suitably compacted.

If the road construction is in close proximity to the top of the gas pipe, a "cushion" of selected fine material such as sand must be used to prevent the traffic shock being transmitted to the gas pipe. The road construction depth must not be reduced without permission from the local Highway Authority.

No concrete or other hard material must be placed or left under or adjacent to any Cast Iron pipe as this may cause fracture of the pipe at a later date.

Concrete backfill should not be used closer than 300 mm to the pipe.

Damage to Coating

Where a gas pipe is coated with special wrapping and this is damaged, even to a minor extent ESP Utilities Group must be notified so that repairs can be made to prevent future corrosion and subsequent leakage.

Welding or "Hot Works"

When welding or other "hot works" involving naked flames are to be carried out in close proximity to gas plant and the presence of gas is suspected, ESP Utilities Group must be contacted before work commences to check the atmosphere. Even when a gas free atmosphere exists care must be taken when carrying out hot works in close proximity to gas plant in order to ensure that no damage occurs.

Particular care must be taken to avoid damage by heat or naked flame to plastic gas pipes or to the protective coating on other gas pipes.

Leakage from Gas Mains or Services

If damage or leakage is caused or an escape of gas is smelt or suspected the following action should be taken at once:

- Remove all personnel from the immediate vicinity of the escape;
- Contact the National Gas Emergency Service on: **0800 111 999**;
- Prevent any approach by the public, prohibit smoking, extinguish all naked flames or other source of ignition for at least 15 metres from the leakage;
- Assist gas personnel, Police or Fire Service as requested.

REMEMBER - IF IN DOUBT; SEEK ADVICE FROM ESP UTILITIES GROUP.

ESP Utilities Group can be contacted at:

Office Address: Bluebird House, Mole Business Park, Leatherhead, Surrey, KT22 7BA

Office Tel: 01372 587 500**; Fax:** 01372 377 996

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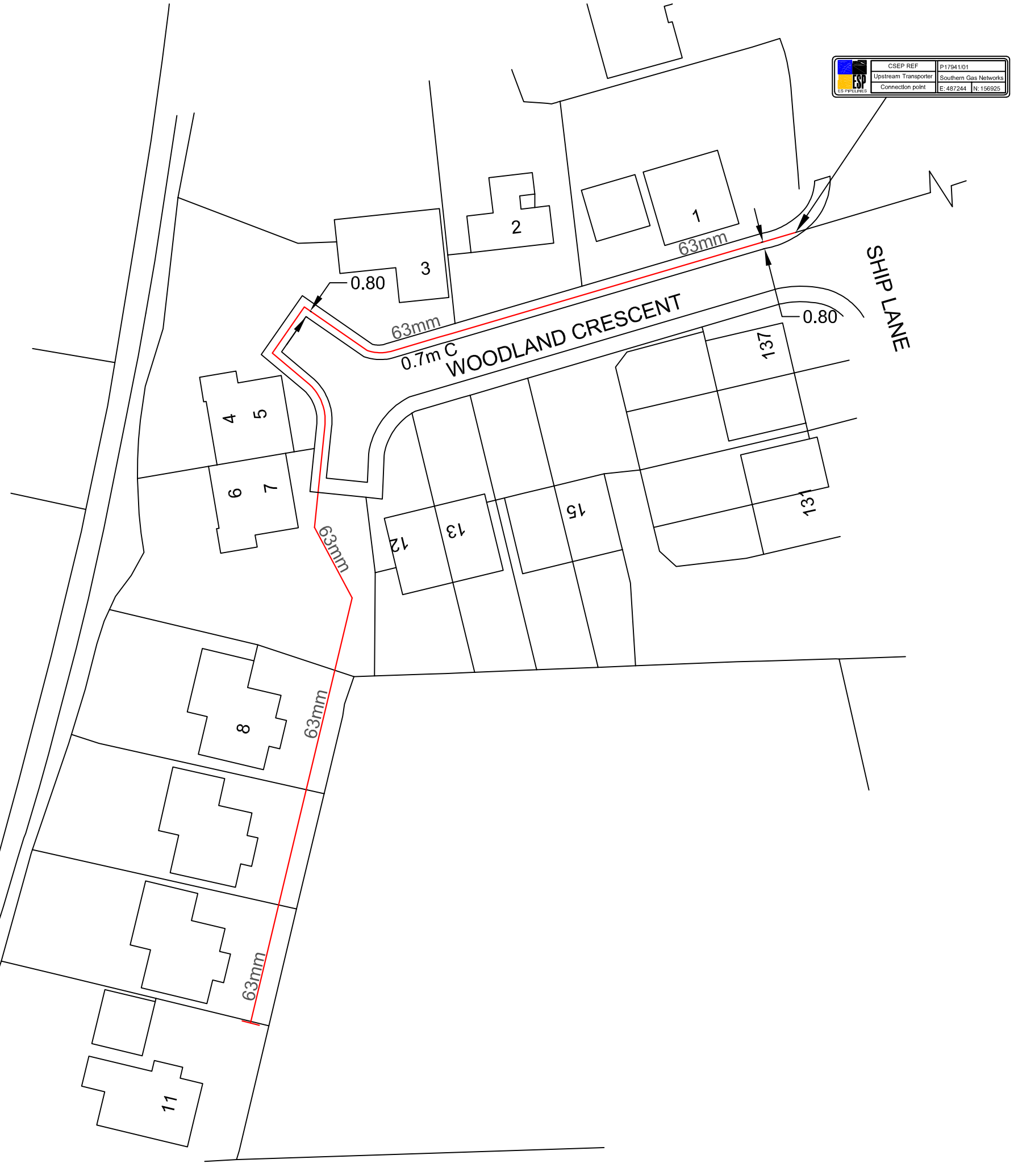

Materials	Description
DI	Ductile Iron Main
CI	Cast Iron Main
ST	Steel main or service
MDPE (17.6)	Medium Density Polyethylene (SDR Rating) main or service
HDPE (11)	High Density Polyethylene (SDR Rating) main or service

Size	Description
12"	Metallic main or service - Imperial (nominal bore)*
150mm	Metallic main or service - Metric (nominal bore)
3"	Polyethylene main or service - Imperial (nominal bore)
90	Polyethylene main or service - Metric (outsidediameter)

* note - for Steel 18" denotes the pipe size where the designation changes from nominal bore to outside diameter

Pressure	Description
LP	Low Pressure - up to 75 millibar gauge
MP	Medium Pressure - between 75 millibar and 2 bar gauge
IP	Intermediate Pressure - between 2 bar and 7 bar gauge
HP	High Pressure - above 7 bar gauge

MDPE Mains: 90mm & above SDR 17.6; 63mm SDR 11

Drawing Nomenclature

- 90 | 125 — Change in diameter nominal bore
- Mains not connected
- Valve
- Pressure Regulator
- Cap End
- Pressure / Purge point
- 0.8m C — Depth of Cover main or service
- 1 — Node

Key for Mains & Service Pipework

- Existing LP mains or services operating up to 75 millibar gauge
- Proposed LP mains or services operating up to 75 millibar gauge
- Existing MP mains or services operating between 75 millibar and 2 bar gauge
- Proposed MP mains or services operating between 75 millibar and 2 bar gauge
- Existing IP mains or services operating between 2 bar and 7 bar gauge
- Proposed IP mains or services operating between 2 bar and 7 bar gauge

ES PIPELINES
ES Pipelines
HAZELDEAN
STATION ROAD
LEATHERHEAD
SURREY
KT22 7AA
Tel: 01372 227560 FAX: 01372 377996

N W E S

Drawn by	Scale:	Date created:
T. Spencer	1:250	April '11

DRAWING TITLE

Ship Lane
Farnborough
hampshire
GU14

Drawing No	PPS10939 / 1162	REV:
Issue Number:	SHEET: 1 of 1	Printed:

Pipe Lengths (mtrs)

	63mm	90mm	125mm	180mm	250mm	315mm	355mm
LP							
MP							
IP							

REV	DETAILS OF REVISION	Date

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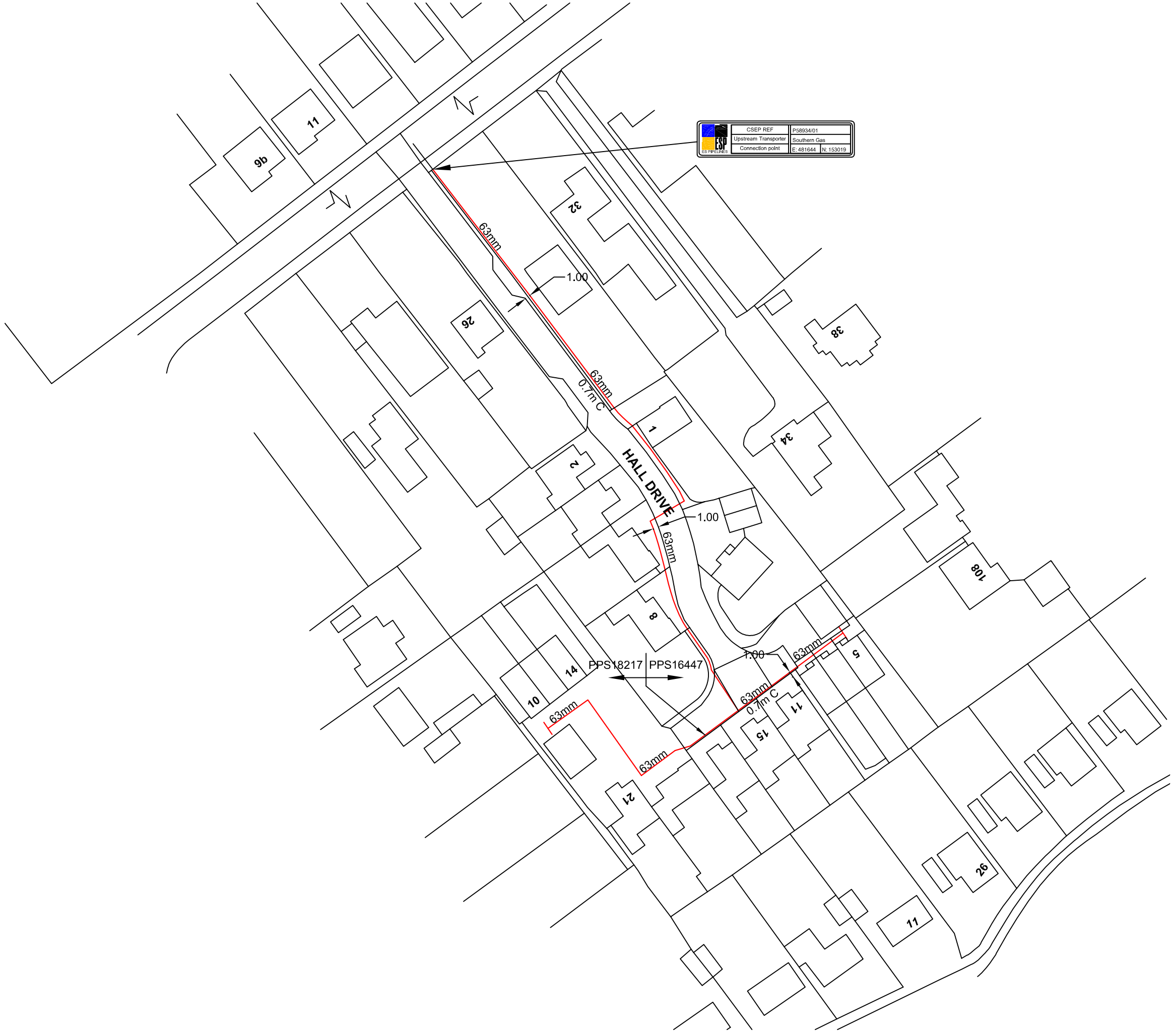

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KT22 7AA
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N / W / E / S

Drawn by	Scale:	Date created:
T.Spencer	1:200	September 11

DRAWING TITLE

Florence Road
Fleet
Hampshire
GU52

Drawing No: PPS16447 / 2395 REV:

Issue Number: SHEET: 1 of 1 Printed:

Pipe Lengths (mm)

	63mm	90mm	125mm	180mm	250mm	315mm	355mm
LP							
MP							
IP							

REV	DETAILS OF REVISION	Date

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CSEP REF	P64504/01
Upstream Transporter	Southern Gas Networks
Connection point	E: 481118 N: 151840

Materials	Descriptlon
DI	Ductlle Iron Maln
CI	Cast Iron Maln
ST	Steel maln or servlce
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N W E S

Drawn by	Scale:	Date created:
T. Spencer	1:125	November 11

DRAWING TITLE

Aldershot Road
Church Crookham
Hampshlre
GU52

Drawlng No	PPS21762_3816	REV:
Issue Number:	SHEET: 1 of 1	Printed:

Pipe Lengths (mm)

	63mm	90mm	125mm	180mm	250mm	315mm	355mm
LP							
MP							
IP							

REV	DETAILS OF REVISION	Date

This Plan shows only the pipes owned by E S Pipelines Ltd in its role as a licensed Gas Transporter (GT), Gas pipes owned by other GT's, and also privately owned, may be present in the area. Information with regard to such pipes should be obtained from the owners. The information shown on this plan is given without obligation, or warranty. The accuracy thereof cannot be guaranteed. All service pipes are not necessarily shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by E S Pipelines Ltd, its agents or servants, for any error or omission. Safe digging practices, as detailed in Health and Safety booklet HS(G)47 'Avoiding danger from underground services', must be used to verify and establish the actual position of mains, services and other plant on site before any Mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct or contract labour) working for you on or near gas apparatus. The information on this plan should not be referred to beyond 28 days following the date of issue. DATE OF ISSUE:

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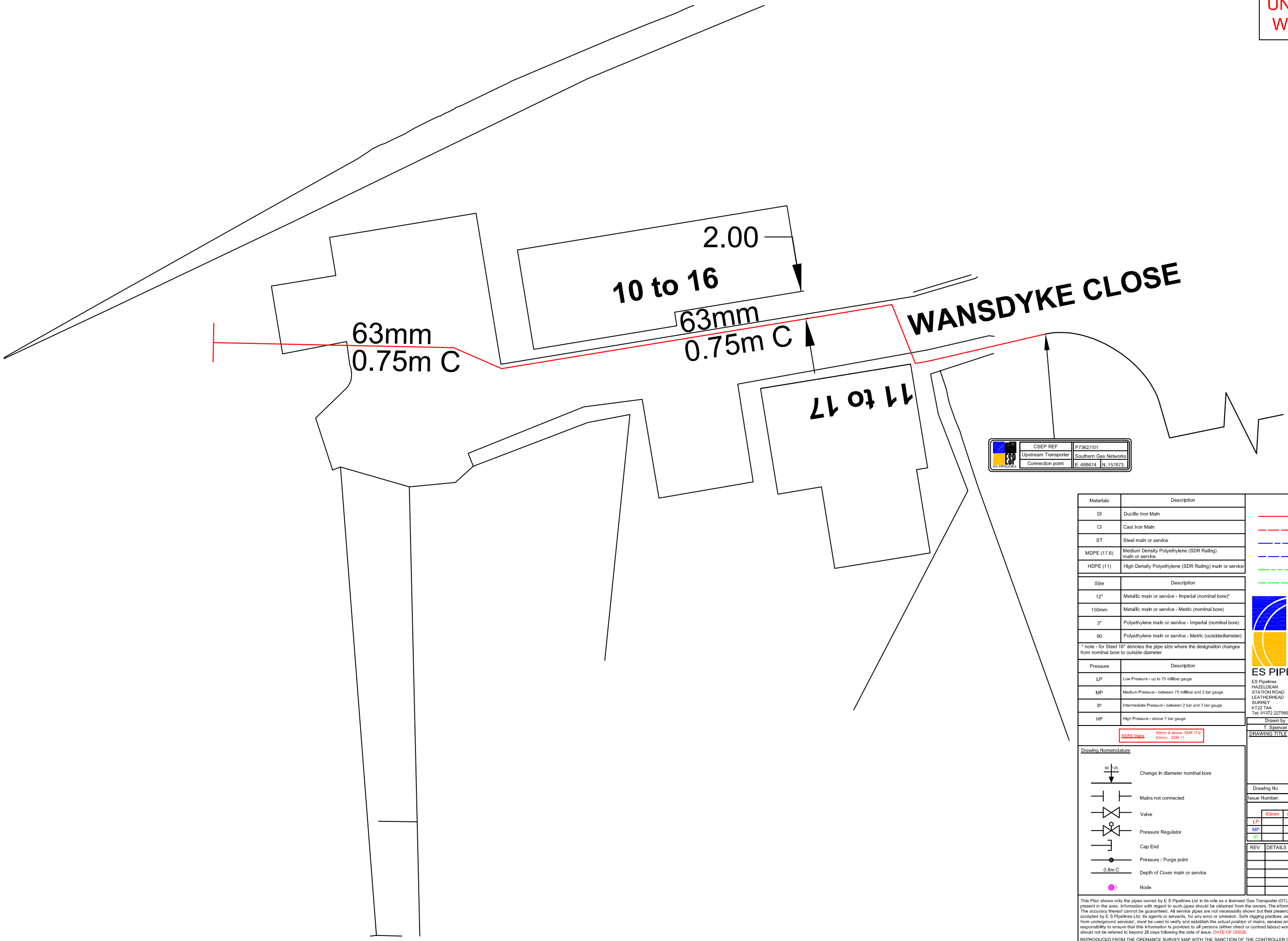

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* note - for Steel 18" denotes the pipe size where the designation changes from nominal bore to outside diameter

Pressure	Description
LP	Low Pressure - up to 75 millibar gauge
MP	Medium Pressure - between 75 millibar and 2 bar gauge
IP	Intermediate Pressure - between 2 bar and 7 bar gauge
HP	High Pressure - above 7 bar gauge

MDPE Mains: 90mm & above SDR 17.6; 63mm SDR 11

Drawing Nomenclature

- 90 125 — Change in diameter nominal bore
- Mains not connected
- Valve
- Pressure Regulator
- Cap End
- Pressure / Purge point
- 0.8m C — Depth of Cover main or service
- 1 — Node

Key for Mains & Service Pipework

- Existing LP mains or services operating up to 75 millibar gauge
- Proposed LP mains or services operating up to 75 millibar gauge
- Existing MP mains or services operating between 75 millibar and 2 bar gauge
- Proposed MP mains or services operating between 75 millibar and 2 bar gauge
- Existing IP mains or services operating between 2 bar and 7 bar gauge
- Proposed IP mains or services operating between 2 bar and 7 bar gauge

ES PIPELINES
ES Pipelines
HAZELDEAN
STATION ROAD
LEATHERHEAD
SURREY
KT22 7AA
Tel: 01372 227560 FAX: 01372 377996

N W E S

Drawn by	Scale:	Date created:
T. Spencer	1:125	November 11

DRAWING TITLE

Worsley Road
Camberley
Surrey
GU16

Drawing No	PPS23925_4350	REV:
Issue Number:	SHEET: 1 of 1	Printed:

Pipe Lengths (mtrs)

	63mm	90mm	125mm	180mm	250mm	315mm	355mm
LP							
MP							
IP							

REV	DETAILS OF REVISION	Date

This Plan shows only the pipes owned by E S Pipelines Ltd in its role as a licensed Gas Transporter (GT). Gas pipes owned by other GT's, and also privately owned, may be present in the area. Information with regard to such pipes should be obtained from the owners. The information shown on this plan is given without obligation, or warranty. The accuracy thereof cannot be guaranteed. All service pipes are not necessarily shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by E S Pipelines Ltd, its agents or servants, for any error or omission. Safe digging practices, as detailed in Health and Safety booklet HS(G)47 'Avoiding danger from underground services', must be used to verify and establish the actual position of mains, services and other plant on site before any Mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct or contract labour) working for you on or near gas apparatus. The information on this plan should not be referred to beyond 28 days following the date of issue. DATE OF ISSUE:

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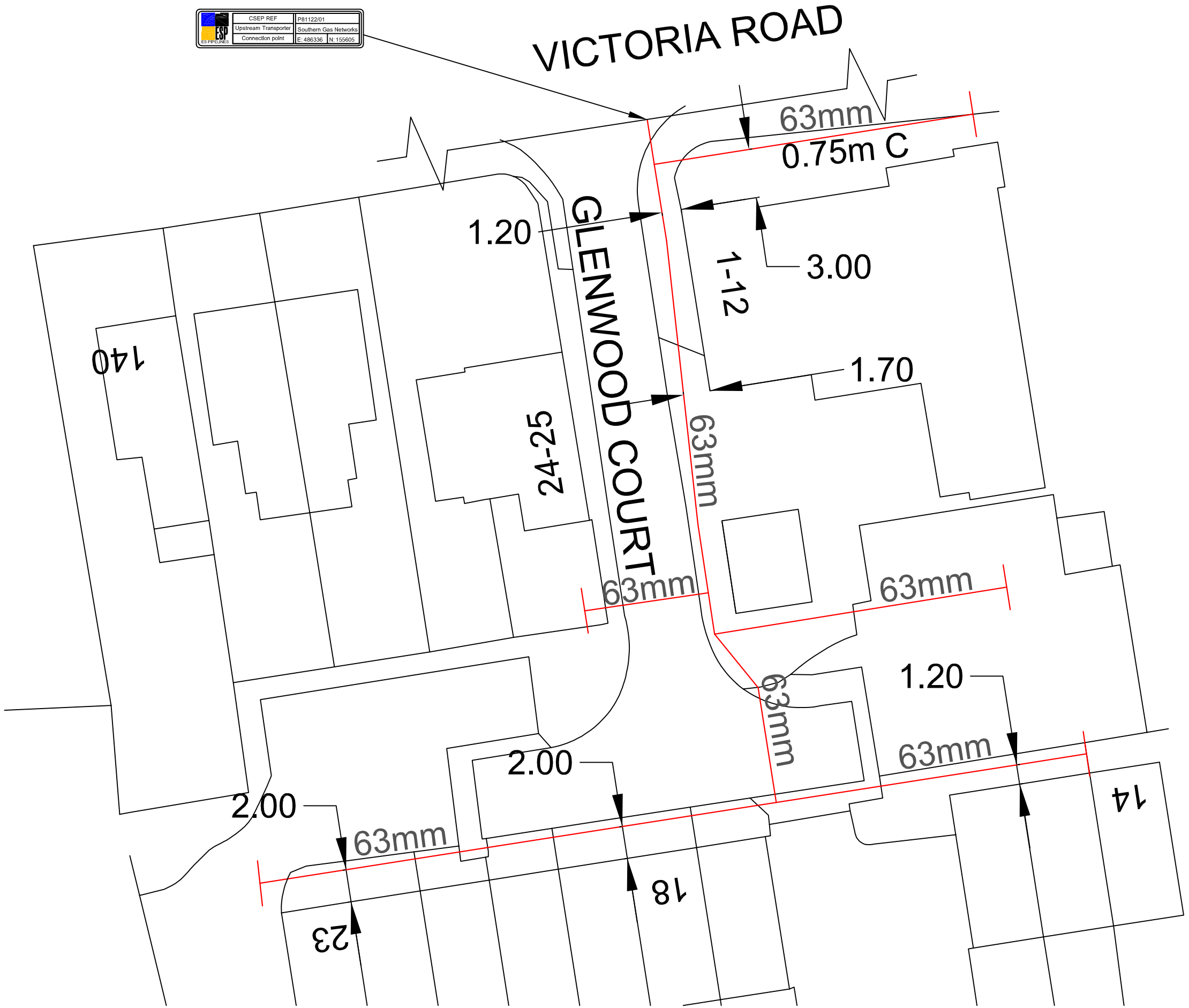

Materials	Descriptlon
DI	Ductile Iron Maln
CI	Cast Iron Maln
ST	Steel maln or servlce
MDPE (17.6)	Medlum Denslty Polyethylene (SDR Ratlng) maln or servlce
HDPE (11)	High Denslty Polyethylene (SDR Ratlng) maln or servlce

Size	Descrlptlon
12"	Metallic main or servlce - Imperial (nominal bore)*
150mm	Metallic maln or servlce - Metrlc (nomlnal bore)
3"	Polyethylene maln or servlce - Imperial (nomlnal bore)
90	Polyethylene maln or servlce - Metrlc (outsidedlameter)

* note - for Steel 18" denotes the plpe slze where the deslgnation changes from nomlnal bore to outside diameter

Pressure	Descrlptlon
LP	Low Pressure - up to 75 millibar gauge
MP	Medium Pressure - between 75 millibar and 2 bar gauge
IP	Intermediate Pressure - between 2 bar and 7 bar gauge
HP	High Pressure - above 7 bar gauge

MDPE Mains 90mm & above SDR 17.6 63mm SDR 11

Drawlng Nomenclature

- 90 / 125 — Change In dlameter nomlnal bore
- Mains not connected
- Valve
- Pressure Regulator
- Cap End
- Pressure / Purge point
- 0.8m C — Depth of Cover maln or servlce
- 1 — Node

Key for Mains & Service Pipework

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- Existing MP mains or services operating between 75 millibar and 2 bar gauge
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- Proposed IP mains or services operating between 2 bar and 7 bar gauge

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SURREY
KT22 7AA
Tel: 01372 227560 FAX: 01372 377996

N W E S

Drawn by	Scale:	Date created:
T. Spencer	1:125	November 11

DRAWING TITLE

Victoria Road
Farnborough
Hampshire
GU14

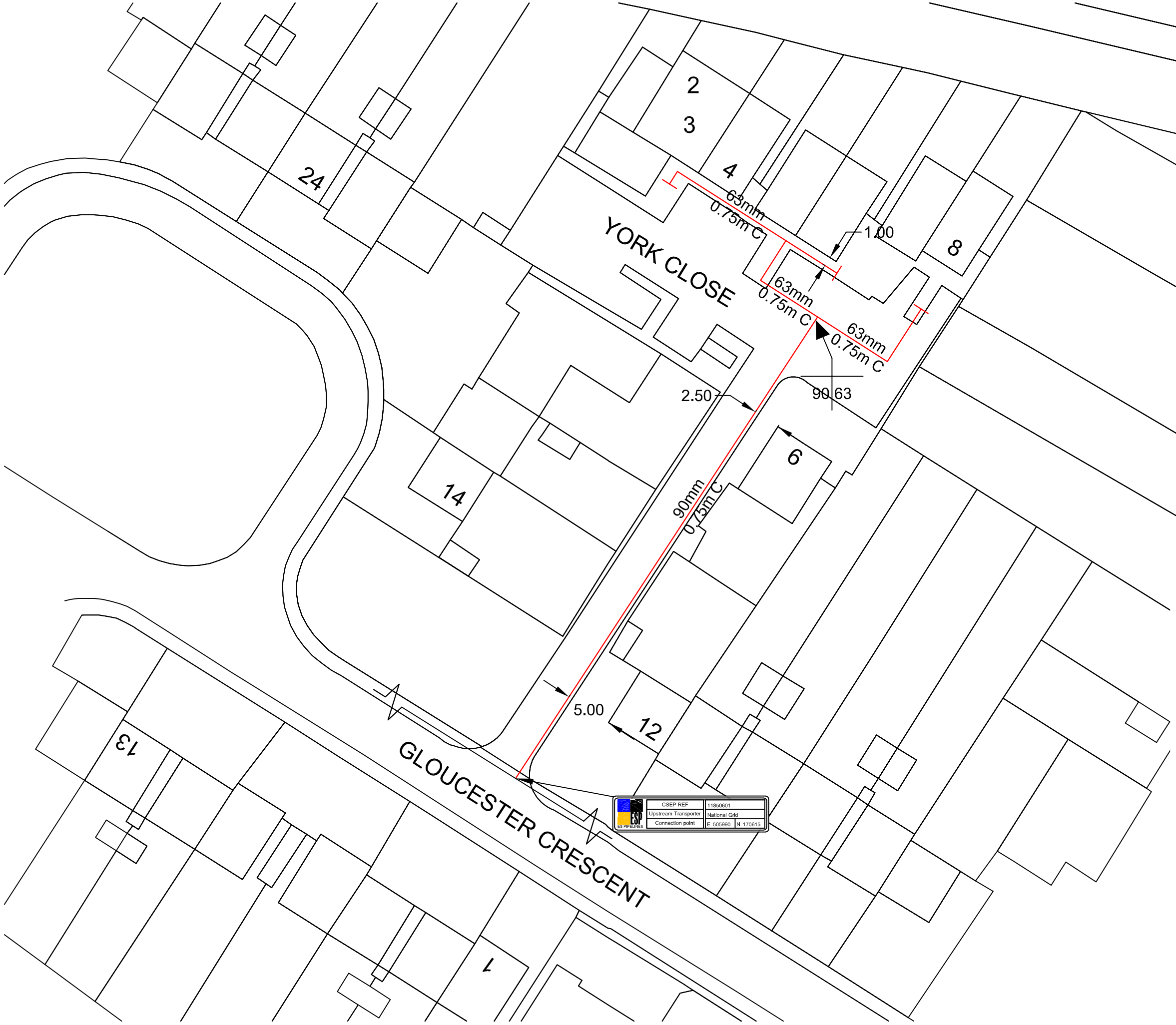
Drawlng No	PPS25489_4783	REV:
Issue Number:	SHEET: 1 of 1	Printed:

Pipe Lengths (mm)

	63mm	90mm	125mm	180mm	250mm	315mm	355mm
LP							
MP							
IP							

REV	DETAILS OF REVISION	Date

UNCONTROLLED WHEN PRINTED



Materials	Description
DI	Ductile Iron Main
CI	Cast Iron Main
ST	Steel main or service
MDPE (17.6)	Medium Density Polyethylene (SDR Rating) main or service
HDPE (11)	High Density Polyethylene (SDR Rating) main or service

Size	Description
12"	Metallic main or service - Imperial (nominal bore)*
150mm	Metallic main or service - Metric (nominal bore)
3"	Polyethylene main or service - Imperial (nominal bore)
90	Polyethylene main or service - Metric (outsidediameter)

* note - for Steel 18" denotes the pipe size where the designation changes from nominal bore to outside diameter

Pressure	Description
LP	Low Pressure - up to 75 millibar gauge
MP	Medium Pressure - between 75 millibar and 2 bar gauge
IP	Intermediate Pressure - between 2 bar and 7 bar gauge
HP	High Pressure - above 7 bar gauge

MDPE Mains 90mm & above SDR 17.6
63mm SDR 11

Drawing Nomenclature

- 90 | 125 — Change in diameter nominal bore
- Mains not connected
- Valve
- Pressure Regulator
- Cap End
- Pressure / Purge point
- 0.8m C — Depth of Cover main or service
- 1 — Node

Key for Mains & Service Pipework

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- Proposed LP mains or services operating up to 75 millibar gauge
- Existing MP mains or services operating between 75 millibar and 2 bar gauge
- Proposed MP mains or services operating between 75 millibar and 2 bar gauge
- Existing IP mains or services operating between 2 bar and 7 bar gauge
- Proposed IP mains or services operating between 2 bar and 7 bar gauge

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N W E S

Drawn by	Scale:	Date created:
M. Hyslop	1:200	December '14

DRAWING TITLE

Gloucester Crescent
Stalnes
Middlesex
TW18

Drawing No	9001328	REV:
Issue Number:	SHEET: 1 of 1	Printed:

Pipe Lengths (mm)

	63mm	90mm	125mm	180mm	250mm	315mm	355mm
LP							
MP							
IP							

REV	DETAILS OF REVISION	Date

This Plan shows only the pipes owned by E S Pipelines Ltd in its role as a licensed Gas Transporter (GT). Gas pipes owned by other GT's, and also privately owned, may be present in the area. Information with regard to such pipes should be obtained from the owners. The information shown on this plan is given without obligation, or warranty. The accuracy thereof cannot be guaranteed. All service pipes are not necessarily shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by E S Pipelines Ltd, its agents or servants, for any error or omission. Safe digging practices, as detailed in Health and Safety booklet HS(G)47 'Avoiding danger from underground services', must be used to verify and establish the actual position of mains, services and other plant on site before any Mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct or contract labour) working for you on or near gas apparatus. The information on this plan should not be referred to beyond 28 days following the date of issue. DATE OF ISSUE:

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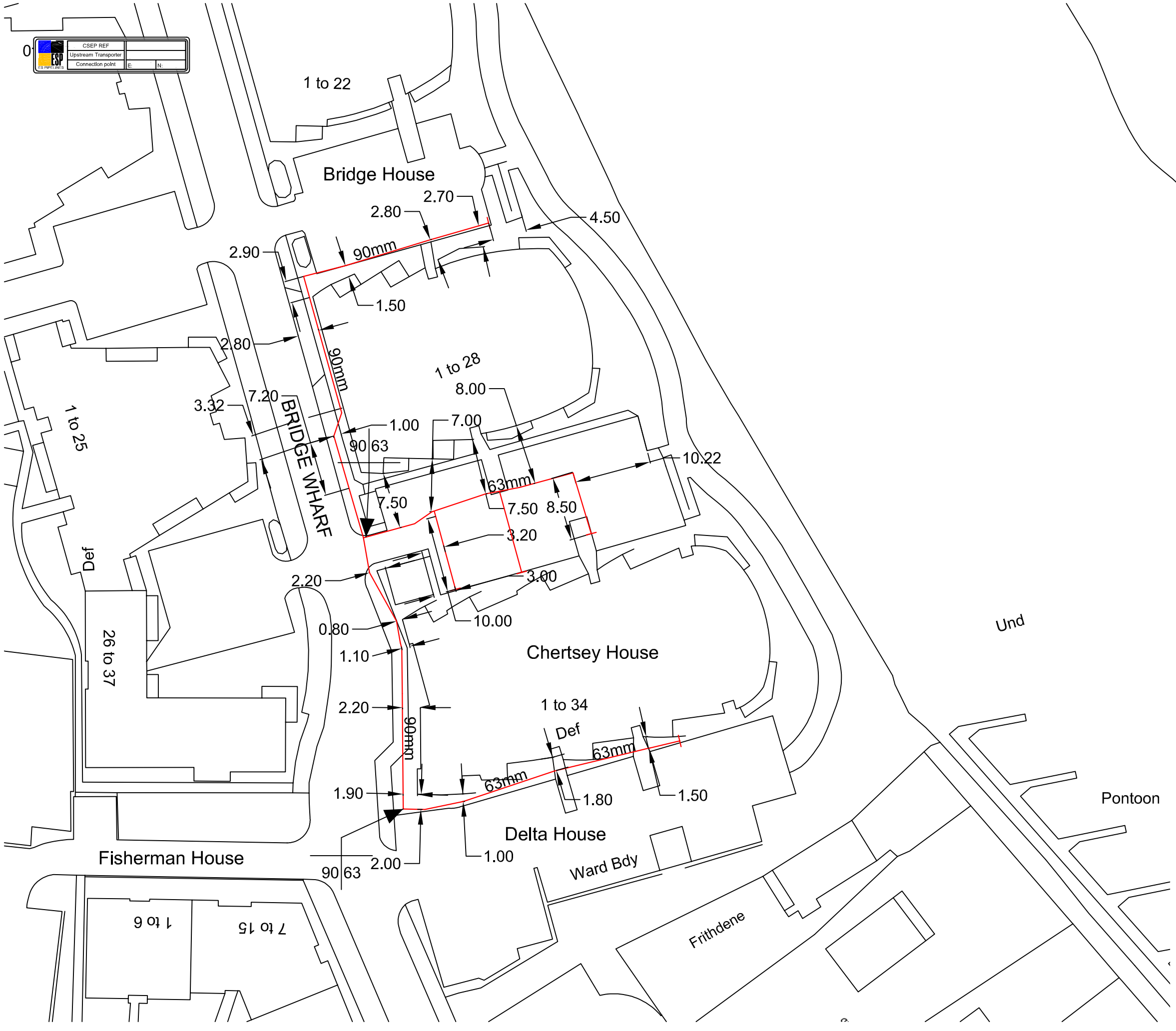

Materials	Description
DI	Ductile Iron Main
CI	Cast Iron Main
ST	Steel main or service
MDPE (17.6)	Medium Density Polyethylene (SDR Rating) main or service
HDPE (11)	High Density Polyethylene (SDR Rating) main or service

Size	Description
12"	Metallic main or service - Imperial (nominal bore)*
150mm	Metallic main or service - Metric (nominal bore)
3"	Polyethylene main or service - Imperial (nominal bore)
90	Polyethylene main or service - Metric (outsidediameter)

* note - for Steel 18" denotes the pipe size where the designation changes from nominal bore to outside diameter

Pressure	Description
LP	Low Pressure - up to 75 millibar gauge
MP	Medium Pressure - between 75 millibar and 2 bar gauge
IP	Intermediate Pressure - between 2 bar and 7 bar gauge
HP	High Pressure - above 7 bar gauge

MDPE Mains 90mm & above SDR 17.6 63mm SDR 11

Drawing Nomenclature

- 90 125 — Change in diameter nominal bore
- Mains not connected
- Valve
- Pressure Regulator
- Cap End
- Pressure / Purge point
- 0.8m C — Depth of Cover main or service
- 1 — Node

Key for Mains & Service Pipework

- Existing LP mains or services operating up to 75 millibar gauge
- Proposed LP mains or services operating up to 75 millibar gauge
- Existing MP mains or services operating between 75 millibar and 2 bar gauge
- Proposed MP mains or services operating between 75 millibar and 2 bar gauge
- Existing IP mains or services operating between 2 bar and 7 bar gauge
- Proposed IP mains or services operating between 2 bar and 7 bar gauge

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ES Pipelines
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N S E W

Drawn by	Scale:	Date created:
M. Hyslop		July '12

DRAWING TITLE

Drawing No REV:

Issue Number: SHEET: 1 of 1 Printed:

Pipe Lengths (mtrs)

	63mm	90mm	125mm	180mm	250mm	315mm	355mm
LP							
MP							
IP							

REV	DETAILS OF REVISION	Date

This Plan shows only the pipes owned by E S Pipelines Ltd in its role as a licensed Gas Transporter (GT). Gas pipes owned by other GT's, and also privately owned, may be present in the area. Information with regard to such pipes should be obtained from the owners. The information shown on this plan is given without obligation, or warranty. The accuracy thereof cannot be guaranteed. All service pipes are not necessarily shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by E S Pipelines Ltd, its agents or servants, for any error or omission. Safe digging practices, as detailed in Health and Safety booklet HS(G)47 'Avoiding danger from underground services', must be used to verify and establish the actual position of mains, services and other plant on site before any Mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct or contract labour) working for you on or near gas apparatus. The information on this plan should not be referred to beyond 28 days following the date of issue. DATE OF ISSUE:

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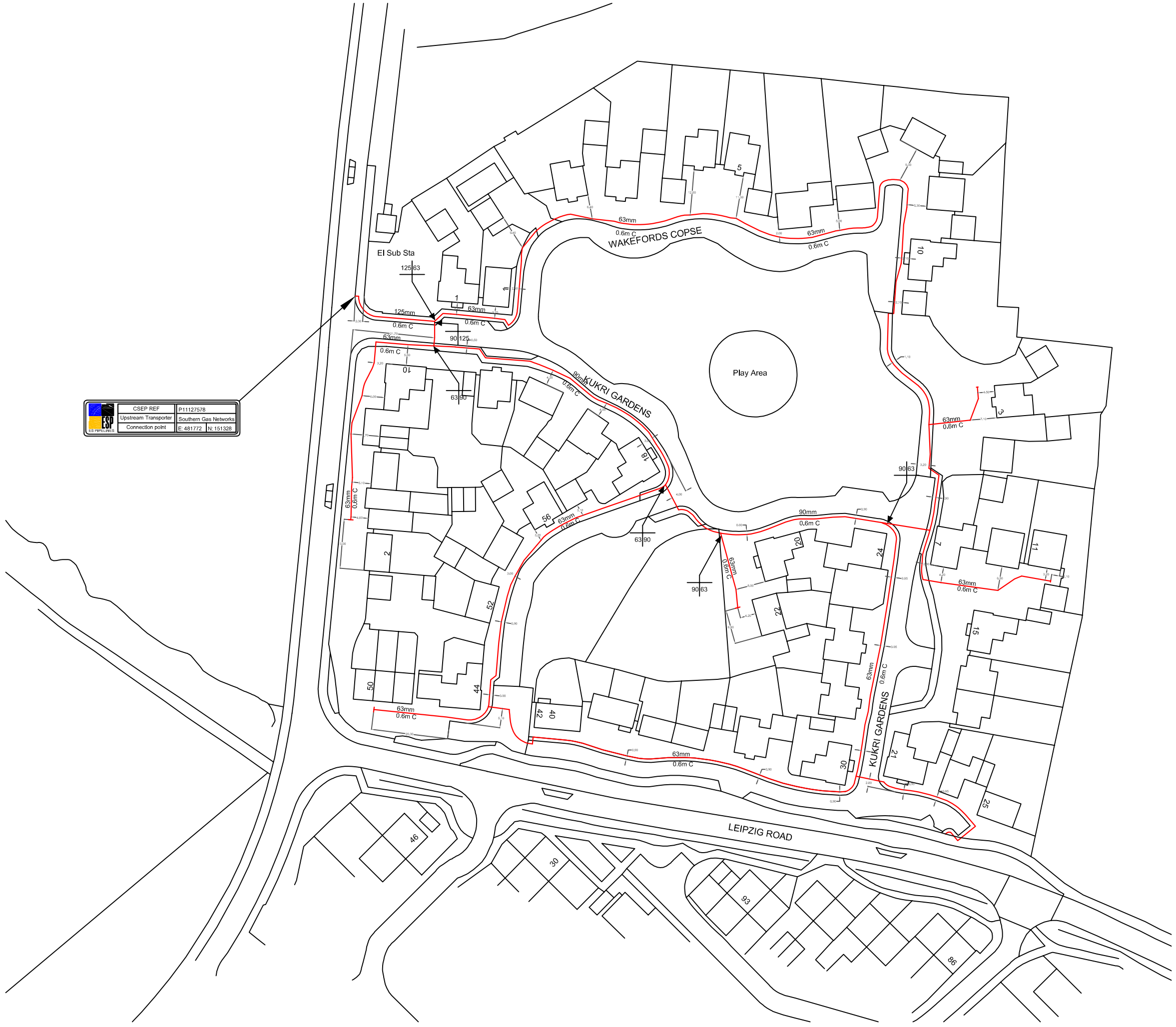


CSEP REF	P11127578	
Upstream Transporter	Southern Gas Networks	
Connection point	E: 481772	N: 151328

Materials	Description
DI	Ductile Iron Main
CI	Cast Iron Main
ST	Steel main or service
MDPE (17.6)	Medium Density Polyethylene (SDR Rating) main or service
HDPE (11)	High Density Polyethylene (SDR Rating) main or service

Size	Description
12"	Metallic main or service - Imperial (nominal bore)*
150mm	Metallic main or service - Metric (nominal bore)
3"	Polyethylene main or service - Imperial (nominal bore)
90	Polyethylene main or service - Metric (outsidediameter)

* note - for Steel 18" denotes the pipe size where the designation changes from nominal bore to outside diameter

Pressure	Description
LP	Low Pressure - up to 75 millibar gauge
MP	Medium Pressure - between 75 millibar and 2 bar gauge
IP	Intermediate Pressure - between 2 bar and 7 bar gauge
HP	High Pressure - above 7 bar gauge

MDPE Mains: 90mm & above SDR 17.6; 63mm: SDR 11

Drawing Nomenclature

- 90/125 — Change in diameter nominal bore
- Mains not connected
- Valve
- Pressure Regulator
- Cap End
- Pressure / Purge point
- 0.8m C — Depth of Cover main or service
- 1 — Node

Key for Mains & Service Pipework

- Existing LP mains or services operating up to 75 millibar gauge
- Proposed LP mains or services operating up to 75 millibar gauge
- Existing MP mains or services operating between 75 millibar and 2 bar gauge
- Proposed MP mains or services operating between 75 millibar and 2 bar gauge
- Existing IP mains or services operating between 2 bar and 7 bar gauge
- Proposed IP mains or services operating between 2 bar and 7 bar gauge

ESP Utilities Group Ltd
Bluebird House
Mole Business Park
Leatherhead
Surrey
KT22 7BA

Main No: 01372 587 500
SPA No: 01372 587 550

ES PIPELINES

Drawn by	Scale:	Date created:
T. Spencer	1:250	December '16

DRAWING TITLE

Queen Elizabeth Barracks Phase 1c
Aldershot Road
Fleet
GU5

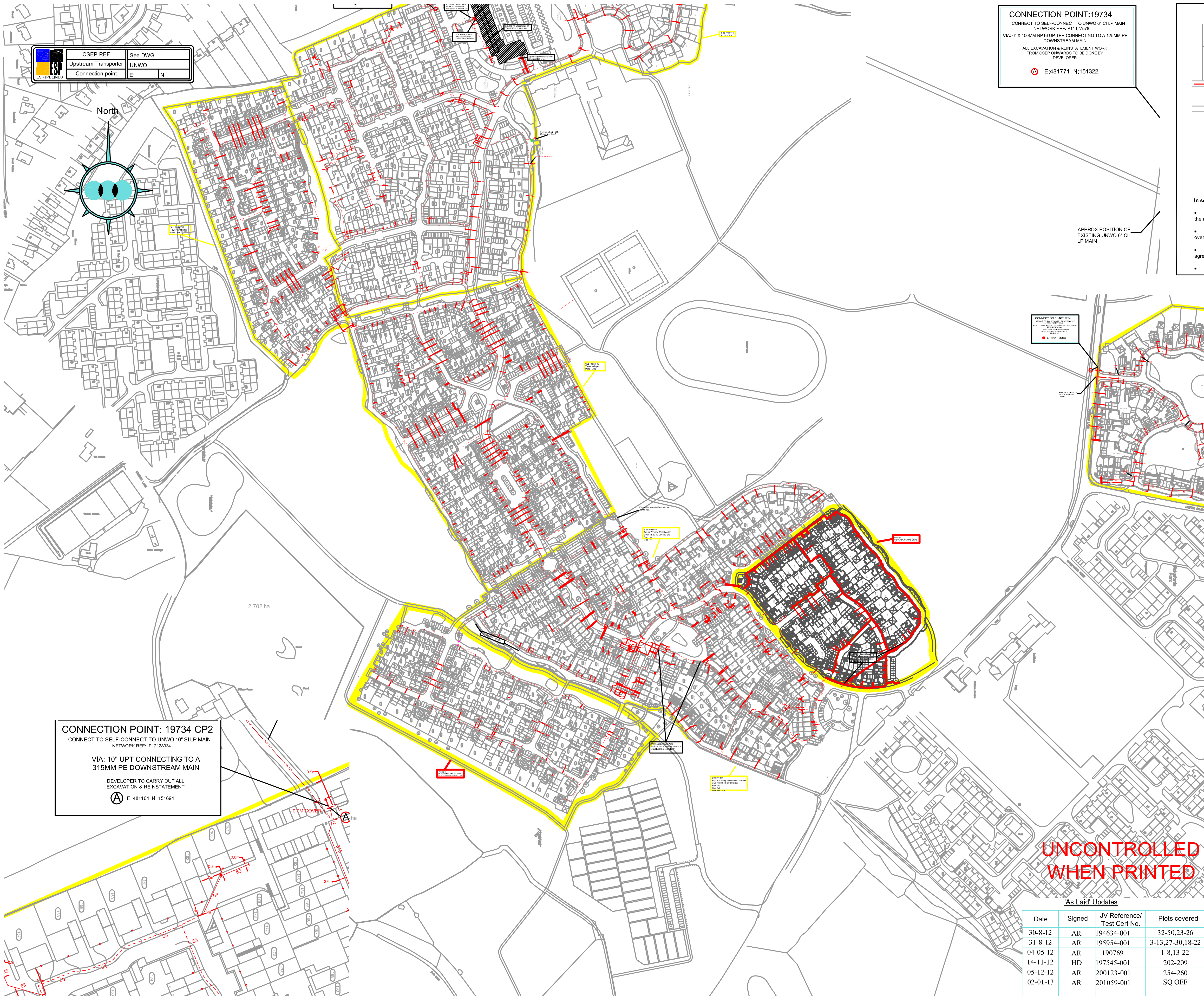
Drawing No	ESN012779	REV:
Issue Number:	SHEET:	Printed:

Pipe Lengths (mmi)

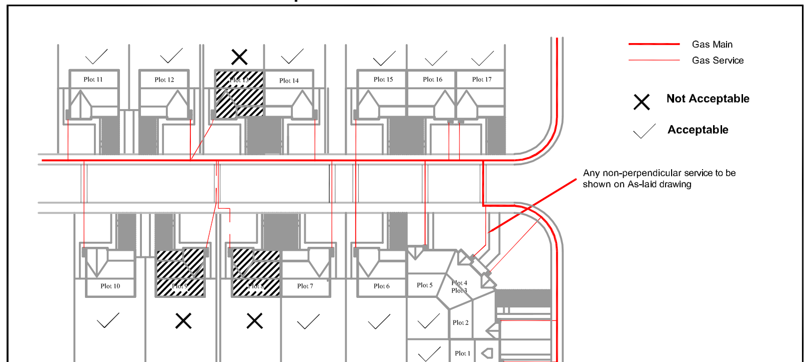
	63mm	90mm	125mm	180mm	250mm	315mm	355mm
LP							
MP							
IP							

REV	DETAILS OF REVISION	Date

This Plan shows only the pipes owned by E S Pipelines Ltd in its role as a licensed Gas Transporter (GT). Gas pipes owned by other GTs, and also privately owned, may be present in the area. Information with regard to such pipes should be obtained from the owners. The information shown on this plan is given without obligation, or warranty. The accuracy thereof cannot be guaranteed. All service pipes are not necessarily shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by E S Pipelines Ltd, its agents or servants, for any error or omission. Safe digging practices, as detailed in Health and Safety booklet HS(G)47 'Avoiding danger from underground services', must be used to verify and establish the actual position of mains, services and other plant on site before any Mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct or contract labour) working for you on or near gas apparatus. The information on this plan should not be referred to beyond 28 days following the date of issue. DATE OF ISSUE:



Gas Service - Route Selection Options

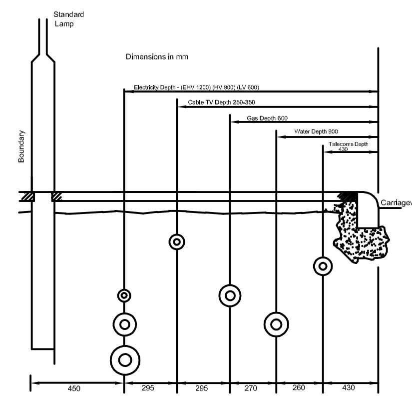


In so far as is reasonably practicable:

- Service routes selected should be perpendicular to the front of the property, and then take the most direct and shortest route from the meter box to the main, bearing in mind the limitation below.
- Service routes should not be laid in any adjacent property and under no circumstances should a service run parallel to a main even over short distances.
- Due to housing layouts, occasionally it is not physically possible to achieve the above. In such circumstances routes MUST be agreed with the designer before installation of the service. It will be required that the service location is recorded on the As Laid drawings
- All services are to be install in full compliance with IGE/TD/4 Edition 4

V1.01acs

DISPOSITION OF UNDERGROUND PIPES AND CABLES IN FOOTPATH



'As Laid' Updates

Date	Signed	JV Reference/ Test Cert No.	Plots covered
30-8-12	AR	194634-001	32-50,23-26
31-8-12	AR	195954-001	3-13,27-30,18-22
04-05-12	AR	190769	1-8,13-22
14-11-12	HD	197545-001	202-209
05-12-12	AR	200123-001	254-260
02-01-13	AR	201059-001	SQ OFF

Materials	Description
DI	Ductile Iron Main
CI	Cast Iron Main
ST	Steel main or service
MDPE (17.6)	Medium Density Polyethylene (SDR Rating) main or service
HDPE (11)	High Density Polyethylene (SDR Rating) main or service

Size	Description
12"	Metallic main or service - Imperial (nominal bore)*
150mm	Metallic main or service - Metric (nominal bore)
3"	Polyethylene main or service - Imperial (nominal bore)
90	Polyethylene main or service - Metric (outsidediameter)

* note - for Steel 18" denotes the pipe size where the designation changes from nominal bore to outside diameter

Pressure	Description
LP	Low Pressure - up to 75 millibar gauge
MP	Medium Pressure - between 75 millibar and 2 bar gauge
IP	Intermediate Pressure - between 2 bar and 7 bar gauge
HP	High Pressure - above 7 bar gauge

MDPE Mains: 90mm & above SDR 17.6; 63mm: SDR 11

Drawing Nomenclature

- 90 125 — Change in diameter nominal bore
- Mains not connected
- Valve
- Pressure Regulator
- Cap End
- Pressure / Purge point
- 0.8m C — Depth of Cover main or service
- 1 — Node

Key for Mains & Service Pipework

- Existing LP mains or services operating up to 75 millibar gauge
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- Proposed IP mains or services operating between 2 bar and 7 bar gauge

ES PIPELINES
ES Pipelines
HAZELDEAN
STATION ROAD
LEATHERHEAD
SURREY
KT22 7AA
Tel: 01372 227560 FAX: 01372 377996

N W E S

Drawn by	Scale:	Date created:
	1:2000	02/05/14

DRAWING TITLE

Queen Elizabeth Barracks
Phase 1a, 1b,1c, 1d
Aldershot Road
Fleet

Drawing No N0019734-1 REV:

ESN Ref: ESN012779/ESN012780 SHEET:

Pipe Lengths (mtrs)

	63mm	90mm	125mm	180mm	250mm	315mm	355mm
LP							
MP							
IP							

REV	DETAILS OF REVISION	Date
1-0	Created from Metropolitan Drawing	02-05-13
1-1	Work Request 97481 added	02-05-13
1-2	Meterbox Postion Moved Plot 210	08-05-13
1-3	Work Request 97659 & 97922 added	17-05-13
1-4	Mains Amended o/s Plots 1-4 Sub 2	20-05-13
1-5	Work Request 98562 added	10-06-13
1-6	Work Request 101110 added	13-06-13
1-7	Work Request 104920 added	03-07-13
1-8	Mains Added to allow for commercial meter	13-08-13
1-9	Mains amended o/s Plot 2F150 & 2F159 to Road Crossing	16-08-13
2-0	Work Request 105149 added	29-08-13
2-1	125mm Mains Added near Plot 261 to Commercial Meter	10-09-13
2-2	Hatching Removed & Meter Locations added Plots 699-728	12-09-13
2-3	New Blank added (DP-500 site Services Geo Ref)	06-11-13
2-4	Sub Project 7 & 6 Boundaries added	05-12-13
2-5	Two Text Boxes Added (N7019734-7)	23-12-13
2-6	Mains Moved into gardens 726-728 & Note added for future development (N7019734-7)	21-01-14
2-7	Mains added o/s Plots 684-691 & across road from plots 677-733	11-02-14
2-8	Work Request 106202 Added	11-02-14
2-9	Work Request 128305 & 121228 added	10-03-14
3-0	Mains Amended outside of Plots 625-653(Sub 6)	14-03-14
3-1	Commercial Meter (Tweseldown School) amended	28-03-14
3-2	New Blank added (Phase 2 Planning Layout Rev D)	15-04-14
3-3	Mains & Services added to New Blank & Parcel.	17-04-14
3-4	Work Request 129407 added	29-04-14
3-5	Work Request 135304 added	20-05-14
3-6	Work Request 138699 added	27-05-14
3-7	Variation to main behind plots 678-691	27-05-14
3-8	Work Request 144528 added	18-09-14
3-9	Boundaries added for Sub 12 & 13 Services added to plots 427-435	26-09-14
4-0	N0015238-1 added to the drawing	02-10-14
4-1	Temporary supply added to N0015238-1	08-10-14
4-2	Work Request 143873 & 143914 added	09-10-14
4-3	Work Request 147173 added	03-11-14
4-4	Temporary Connection Moved to Avoid ESSO Pipeline.	03-11-14
4-5	Work Request 154027 & 106202 added	04-12-14
4-6	Variation - Sub 14 Added	06-01-15
4-7	Variation - Mains amended between plots 705-712	08-01-15
4-8	Work Request 182271 added	20/04/15
4-9	Work Request 182048 added	01/05/15

This Plan shows only the pipes owned by E S Pipelines Ltd in its role as a licensed Gas Transporter (GT). Gas pipes owned by other GT's, and also privately owned, may be present in the area. Information with regard to such pipes should be obtained from the owners. The information shown on this plan is given without obligation, or warranty. The accuracy thereof cannot be guaranteed. All service pipes are not necessarily shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by E S Pipelines Ltd, its agents or servants, for any error or omission. Safe digging practices, as detailed in Health and Safety booklet HS(G)47 'Avoiding danger from underground services', must be used to verify and establish the actual position of mains, services and other plant on site before any Mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct or contract labour) working for you on or near gas apparatus. The information on this plan should not be referred to beyond 28 days following the date of issue. DATE OF ISSUE:

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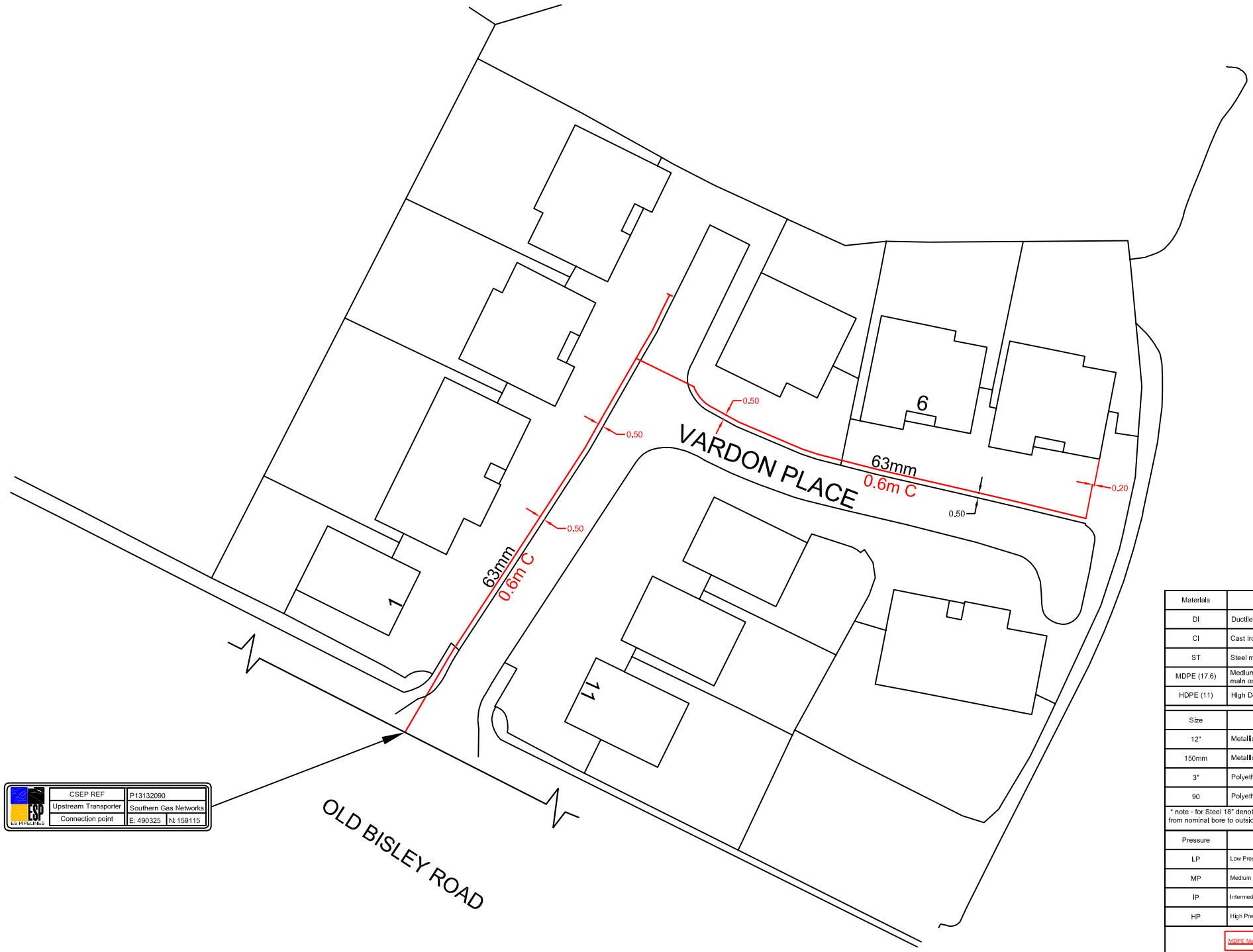

Materials	Description
DI	Ductile Iron Main
CI	Cast Iron Main
ST	Steel main or service
MDPE (17.6)	Medium Density Polyethylene (SDR Rating) main or service
HDPE (11)	High Density Polyethylene (SDR Rating) main or service

Size	Description
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150mm	Metallic main or service - Metric (nominal bore)
3"	Polyethylene main or service - Imperial (nominal bore)
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* note - for Steel 18" denotes the pipe size where the designation changes from nominal bore to outside diameter

Pressure	Description
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MDPE Mains: 90mm & above SDR 17.6; 63mm SDR 11

Drawing Nomenclature

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- Cap End
- Pressure / Purge point
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- Proposed MP mains or services operating between 75 millibar and 2 bar gauge
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- Proposed IP mains or services operating between 2 bar and 7 bar gauge

ESP Utilities Group Ltd
Bluebird House
Mole Business Park
Leatherhead
Surrey
KT22 7BA

Main No: 01372 587 500
SPA No: 01372 587 550

ES PIPELINES

Drawn by	Scale:	Date created:
T. Spencer	1:250	August '16

DRAWING TITLE

Plots 1 - 11 Old Bailey Road
Frimley
Surrey
GU16

Drawing No	ESN014299	REV:
Issue Number:	SHEET:	Printed:

Pipe Lengths (mm)

	63mm	90mm	125mm	180mm	250mm	315mm	355mm
LP							
MP							
IP							

REV	DETAILS OF REVISION	Date

UNCONTROLLED WHEN PRINTED

CSEP REF	P13133117
Upstream Transporter	Southern Gas Networks
Connection point	E: 486389 N: 155615

VICTORIA ROAD

4.20

63mm
0.75m C

13.60

122

112

KENSINGTON PLACE

63mm
0.6m C

0.90

0.90

0.90

1.00

5

14

Materials	Description
DI	Ductile Iron Main
CI	Cast Iron Main
ST	Steel main or service
MDPE (17.6)	Medium Density Polyethylene (SDR Rating) main or service
HDPE (11)	High Density Polyethylene (SDR Rating) main or service

Size	Description
12"	Metallic main or service - Imperial (nominal bore)*
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* note - for Steel 18" denotes the pipe size where the designation changes from nominal bore to outside diameter

Pressure	Description
LP	Low Pressure - up to 75 millibar gauge
MP	Medium Pressure - between 75 millibar and 2 bar gauge
IP	Intermediate Pressure - between 2 bar and 7 bar gauge
HP	High Pressure - above 7 bar gauge

MDPE Mains: 90mm & above SDR 17.6; 63mm SDR 11

Drawing Nomenclature

- 90 / 125 — Change in diameter nominal bore
- Mains not connected
- Valve
- Pressure Regulator
- Cap End
- Pressure / Purge point
- 0.8m C — Depth of Cover main or service
- Node

Key for Mains & Service Pipework

- Existing LP mains or services operating up to 75 millibar gauge
- Proposed LP mains or services operating up to 75 millibar gauge
- Existing MP mains or services operating between 75 millibar and 2 bar gauge
- Proposed MP mains or services operating between 75 millibar and 2 bar gauge
- Existing IP mains or services operating between 2 bar and 7 bar gauge
- Proposed IP mains or services operating between 2 bar and 7 bar gauge

ESP Utilities Group Ltd
Bluebird House
Mole Business Park
Leatherhead
Surrey
KT22 7BA

Main No: 01372 587 500
SPA No: 01372 587 550

ES PIPELINES

Drawn by	Scale:	Date created:
M. Hyslop	1:125	January '17

DRAWING TITLE

Victoria Road & Kensington Place
Farnborough
Hampshire
GU14

Drawing No	ESN015012	REV:
Issue Number:	SHEET: 1 of 1	Printed:

Pipe Lengths (mm)

	63mm	90mm	125mm	180mm	250mm	315mm	355mm
LP							
MP							
IP							

REV	DETAILS OF REVISION	Date

This Plan shows only the pipes owned by E S Pipelines Ltd in its role as a licensed Gas Transporter (GT). Gas pipes owned by other GT's, and also privately owned, may be present in the area. Information with regard to such pipes should be obtained from the owners. The information shown on this plan is given without obligation, or warranty. The accuracy thereof cannot be guaranteed. All service pipes are not necessarily shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by E S Pipelines Ltd, its agents or servants, for any error or omission. Safe digging practices, as detailed in Health and Safety booklet HS(G)47 'Avoiding danger from underground services', must be used to verify and establish the actual position of mains, services and other plant on site before any Mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct or contract labour) working for you on or near gas apparatus. The information on this plan should not be referred to beyond 28 days following the date of issue. DATE OF ISSUE:

UNCONTROLLED WHEN PRINTED

CSEP REF	ISEP 1	
Upstream Transporter	National Grid	
Connection point	E: 503765	N: 166018

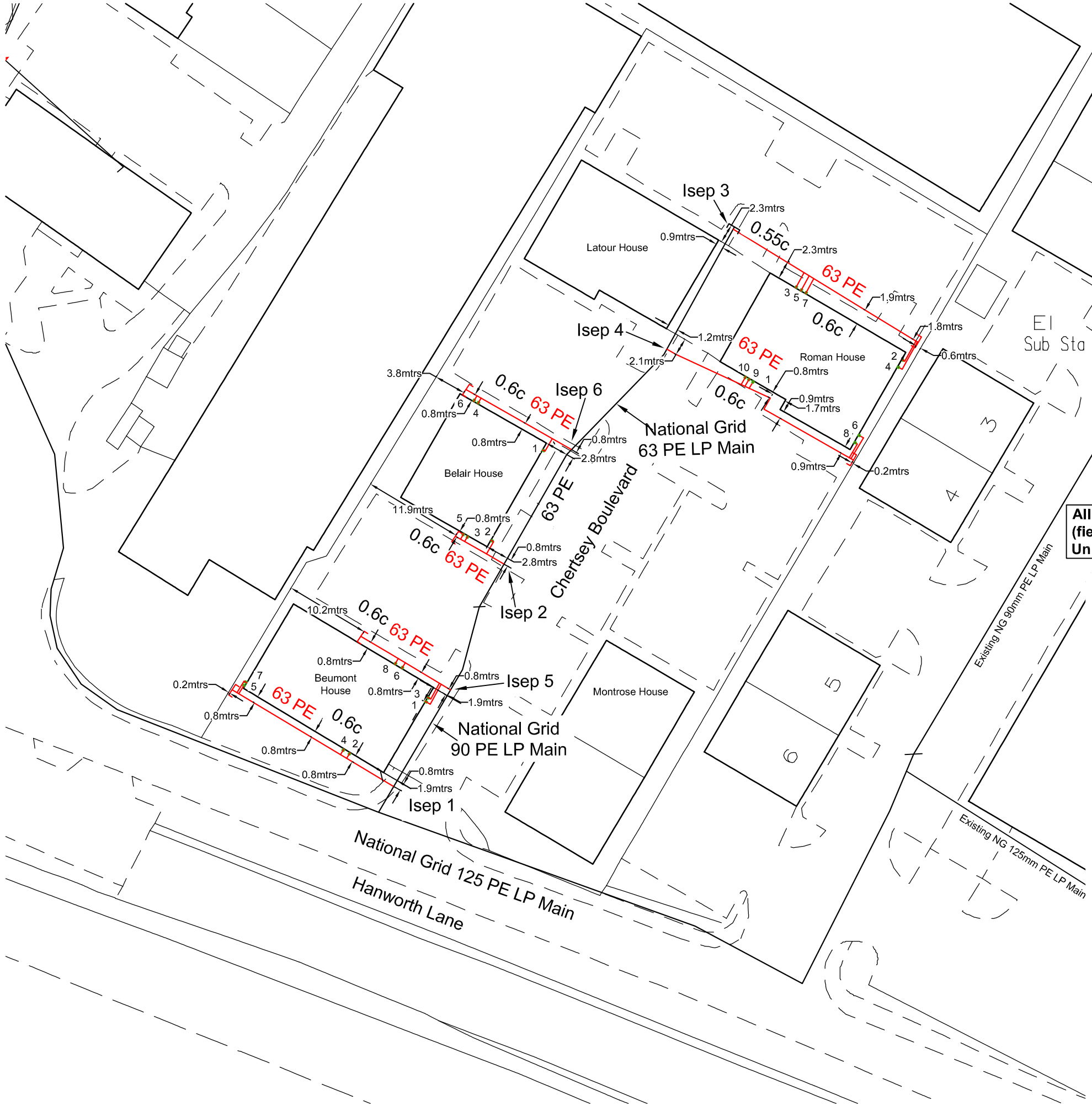
CSEP REF	ISEP 2	
Upstream Transporter	National Grid	
Connection point	E: 503777	N: 166046

CSEP REF	ISEP 3	
Upstream Transporter	National Grid	
Connection point	E: 503806	N: 166084

CSEP REF	ISEP 4	
Upstream Transporter	National Grid	
Connection point	E: 503799	N: 166072

CSEP REF	ISEP 5	
Upstream Transporter	National Grid	
Connection point	E: 503773	N: 166030

CSEP REF	ISEP 6	
Upstream Transporter	National Grid	
Connection point	E: 503785	N: 166060



All mains laid at standard depth of cover (fields) 1.1m, (roads & verge) 0.75m, (footpath) 0.6m Unless otherwise stated.

Materials	Description
DI	Ductile Iron Main
CI	Cast Iron Main
ST	Steel main or service
MDPE (17.6)	Medium Density Polyethylene (SDR Rating) main or service
HDPE (11)	High Density Polyethylene (SDR Rating) main or service

Size	Description
12"	Metallic main or service - Imperial (nominal bore)*
150mm	Metallic main or service - Metric (nominal bore)
3"	Polyethylene main or service - Imperial (nominal bore)
90	Polyethylene main or service - Metric (outsidediameter)

* note - for Steel 18" denotes the pipe size where the designation changes from nominal bore to outside diameter

Pressure	Description
LP	Low Pressure - up to 75 millibar gauge
MP	Medium Pressure - between 75 millibar and 2 bar gauge
IP	Intermediate Pressure - between 2 bar and 7 bar gauge
HP	High Pressure - above 7 bar gauge

MDPE Mains 90mm & above: SDR 17.6 63mm: SDR 11

Drawing Nomenclature

- 90 | 125 — Change In diameter nominal bore
- Mains not connected
- Valve
- Pressure Regulator
- Cap End
- Pressure / Purge point
- 0.8m C — Depth of Cover main or service
- 1 — Node

Key for Mains & Service Pipework

- Existing LP mains or services operating up to 75 millibar gauge
- Proposed LP mains or services operating up to 75 millibar gauge
- Existing MP mains or services operating between 75 millibar and 2 bar gauge
- Proposed MP mains or services operating between 75 millibar and 2 bar gauge
- Existing IP mains or services operating between 2 bar and 7 bar gauge
- Proposed IP mains or services operating between 2 bar and 7 bar gauge

ES PIPELINES
ES Pipelines
HAZELDEAN
STATION ROAD
LEATHERHEAD
SURREY
KT22 7AA
Tel: 01372 227560 FAX: 01372 377996

Drawn by	Scale:	Date created:
JAR	1:250	26-08-2015

DRAWING TITLE

6 ISEP's @ Beumont House, Belair House & Roman House, Chertsey Boulevard, Chertsey, Surrey KT16 9JX

Drawing No	ESN017205	REV: 1
Issue Number:	SHEET: 1 of 1	Printed:

Pipe Lengths (mtrs)

	63mm	90mm	125mm	180mm	250mm	315mm	355mm
LP	112						
MP							
IP							

REV	DETAILS OF REVISION	Date
1	Aslaid records	26-08-2015

Network Design:

Mains Design Pressure and Velocity	LP		MP	
Source Pressure	24 mBar			mBar
Peak Flow	31.9 m3/hr			m3/hr
Maximum Velocity	1.7 m/s			m/s
Minimum Pressure	23.23 mBar	On combi test		mBar
Pressure Drop	0.77 mBar			0 mBar

Connection

Parent Main Operator	National Grid
Parent Main Dia	125mm
Parent Main Material	PE
Connection	Branch Saddle Connection
POC Coordinates	506504, 173272
Downstream Main	90mm PE

Mains Lengths (m) and Diameters

Pe LP		Pe MP		Pe IP	
63mm	317	63mm		63mm	
90mm	6	90mm		90mm	
125mm		125mm		125mm	
180mm		180mm		180mm	
250mm		250mm		250mm	
315mm		315mm		315mm	
355mm		355mm		355mm	

Steel LP		Steel MP		Steel IP	

METER BOX POSITIONS MUST BE LOCATED NO FURTHER THAN 2.0m FROM THE FRONT OF THE BUILDING

Service Terminations

ALL DOMESTIC SERVICES ARE 32MM Pe UNLESS SHOWN OTHERWISE

Above ground entries for pipe of diameter exceeding 150mm bore and all services of MOP exceeding 2bar are preferred.

Note: Meter boxes have to be ventilated.

PE TERMINATION IN A MULTIBOX METER BOX

Note: Meter boxes have to be ventilated.

PE TERMINATION IN A SEMI CONCEALED METER BOX

Note: The meter box requires ventilation openings.

PE ABOVE GROUND TERMINATION IN INSET METER BOX

Note: Meter boxes have to be ventilated.

PE TERMINATION IN A GARAGE

Gas Transporter (GT). Gas pipes owned by other GT's, and also privately owned, may be present in the area. Information with regard to such pipes should be obtained from the owners. The information shown on this plan is given without obligation, or warranty. The accuracy thereof cannot be guaranteed. All service pipes are not necessarily shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by E S Pipelines Ltd, its agents or servants, for any error or omission. Safe digging practices, as detailed in Health and Safety booklet HS(G)47 'Avoiding danger from underground services', must be used to verify and establish the actual position of mains, services and other plant on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct or contract labour) working for you on or near gas apparatus. The information on this plan should not be referred to beyond 28 days following the date of issue. (See below for date of issue)

ESP GAS GROUP
ES Pipelines
HAZELDEAN
STATION ROAD
LEATHERHEAD
SURREY
KT22 7AA
Tel: 01372 227560 FAX: 01372 377996

Pipe Jointing

Design is based on electro fused and/or butt fused internally de beaded pipe

M/P Meter/Regulator Housing - Minimum Proximity Distances	
Minimum distance of meter box to any opening such as openable window, door, air brick, balanced flue, or other breach	0.18m
Minimum distance above or to the side of a meter box, to any electrical equipment such as lights, switches and power points	0.33m
Minimum distance of a relief vent tip to any opening such as openable window, door, air brick, balanced flue, or other breach	1.00m
Minimum distance of a relief vent tip to any electrical equipment such as lights, switches and power points	1.55m

Medium Pressure Services

Service Isolation valves (SIVs) and Service excess flow valves (SEFVs) should be fitted on all MP domestic services where the PID ≤6scmh (65kW). All other MP services should be provided with service isolation valves.

METER ROOM(S)

INDIVIDUAL METERS OR METERS TO BE LOCATED ON MANIFOLD(S) IN PURPOSE BUILT GROUND FLOOR/BASEMENT METER ROOM(S) MUST HAVE SECURE PERMANENTLY VENTILATED DOOR(S) OPENING DIRECTLY TO THE OUTSIDE OR INTO PERMANENTLY VENTILATED BASEMENT GARAGE AREA

METER ROOM VENTILATION

EFFECTIVE VENTILATION AREA TO BE NOT LESS THAN 2% OF THE FLOOR AREA OF ROOM (OR OF ITS NOTIONAL EQUIVALENT) OR 3% WHERE VENTILATION IS PROVIDED IN ONE WALL ONLY. ROOM TO BE SEALED FROM REST OF INTERIOR OF BUILDING

IF IN DOUBT PLEASE SEEK ADVICE.

FIGURE 1 - Recommended Positioning of Utility Apparatus in a 2 metre Footway
Taken from NJUG Publication: Volume 1: Issue 2: 02/11/2007

Note: This diagram is not to scale

FIGURE 2 - Recommended Positioning of Utility Apparatus in a Carriageway

Note: This diagram is not to scale

Minimum Proximity to Normally Occupied Buildings

Pe

Type of Main	Diameter of Main (mm)	Minimum Building Proximity Distance (m) ≤ 75mbar	> 75mbar - ≤2bar	>2bar - ≤5.5bar	>5.5bar - ≤7bar
Pe Non-Inserted	Up to 125	0.25	2	4	6
	126 to 355	1	2	4	6
	356 to 500	1	2	4	8
	501 to 1000	1	5	13	15
Pe Inserted	Up to 125	0.25	1	2	3
	126 to 355	0.5	1	2	3
	356 to 500	0.5	1	2	3
	501 to 1000	0.5	1	3	3

Steel

Type of Main	Wall Thickness of Main (mm)	Minimum Building Proximity Distance (m) ≤ 75mbar	> 75mbar - ≤2bar	>2bar - ≤5.5bar	>5.5bar - ≤7bar
Steel	Steel t ≤ 9.52	0.25	1	3	13
	Steel t > 9.52 - ≤ 11.91	0.25	1	3	6
	Steel t ≥ 11.91	0.25	1	3	3

Depth of Cover - Mains & Services	
Main (fields)	1.1m
Main (road & verge)	0.75m
Main (footpath)	0.6m
Service (road & verge)	0.45m
Service (footpath)	0.45m
Service (private land)	0.375m

Depths are for proposed & aslaid mains & services unless shown otherwise.

Gas Ducts

Gas Pipe Outside Diameter	Duct Inside Diameter
20, 25 and 32mm	50mm
63mm	100mm
90mm	150mm
125mm and 180mm	225mm
250mm	350mm
315mm	450mm

Rigid plastic ducting can be used for perpendicular road crossings only. The developer is responsible for the supply and installation of ducting. A suitable standard for plastic ducting is BS 4962. Corrugated ducting must not be used for road crossings. Gas marker tape shall be laid approximately 100mm above all services and service ducts.

LEGEND

Gas

High Pressure Existing	🟨
Intermediate Pressure Existing	🟩
Medium Pressure Existing	🟦
Low Pressure Existing	🟥
High Pressure Proposed	🟨
Intermediate Pressure Proposed	🟩
Medium Pressure Proposed	🟦
Low Pressure Proposed	🟥
Service Proposed	🟥
Duct	▬
Reducer	▶▶
Valve	⋈⋈⋈
Governor	⊠
Proposed Abandoned Services	✕✕✕
Point of Disconnection	●

All pipe fittings used on this design are to be in accordance with PL2/E,L2/E and F7/E PRI (where included in design) to IGE/TD/13 Ed 2 & GIS E34

The information shown on this plan is given without obligation or warranty. The accuracy therof cannot be guaranteed. Where service pipes are shown their position is approximate. No liability of any kind whatsoever is accepted by the company, its agents or servants for any error or omission. The actual position of mains and services must be verified and established on site before any excavations are carried out or any mechanical plant used. For details of all existing apparatus, please consult the records department of the host utility. Any exisiting apparatus shown on this drawing is for planning purposes only, the positions of which are to be taken as approximate only.

Gas network design by: Steve Richards BSc, I.Eng, MIGEM
GasDesign Utilities Ltd, 20 Broad Street, Whittlesey, Peterborough, PE7 1HA
www.gasdesignuk.com Tel. 01733 202914
GIRS Reg. No.: IUP 2000015/0029/001F

Gas Network Design Drawing

Revision	Date	Details
7	18/07/16	Node 1-2 & 2-6 upsized to 90mm PE.
6	02/07/16	Main altered between nodes 20-7-21.
5	05/10/15	POC changed to 125mm PE (diverted main).
4	14/09/15	New POC and route between nodes 2-3 & 2-6.
3	27/08/15	New CAD plan used, mains altered to suit Block 39-46.
2	04/08/15	Service routes changed on Block 39-46 (Node 18-19 removed).
1	15/05/15	Original Drawing

New Site (Domestic), 37 Plots, Stanwell, Phase 4,
Staines Upon Thames, Surrey, TW19 7SQ

Client ref: F610	ESP No. ESN017326

Ref: B9646995a	Date: 15/05/15	Scale: 1:250@A1	Drawn By: AG

From: Hebden, Rachael
Sent: 16 August 2018 11:18
To: 'southamptontolondonpipeline@pins.gov.uk' <southamptontolondonpipeline@pins.gov.uk>
Subject: Southampton to London Pipeline ref EN070005_000008_270718

Dear Mr Breslaw & Ms Shoesmith,

Re: Consultation for Southampton to London Pipeline ref EN070005_000008_270718

Thank you for consulting Fareham Borough Council regarding the above. As the pipeline does not pass through Fareham Borough we do not hold any information that would be of relevance to the project and therefore have no comments to make.

Kind regards,

Rachael

Rachael Hebden
Senior Planner Strategic Sites (Development Management)
Fareham Borough Council
01329 824424
[redacted]

Forestry Commission England

Marie Shoesmith
Senior EIA and Land Rights Advisor
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

South East & London Area Office
Bucks Horn Oak
Farnham
GU10 4LS

Tel: 0300 0674420
southeast.fce@forestrycommission.gov.uk

Area Director
Alison Field

24 August, 2018

Your Ref:
EN070005_000008_27071 8 Southampton to London Pipeline - EIA Scoping Notification and Consultation

Dear Ms Shoesmith,

Thank you for your consultation on the above scheme dated 27 July 2018, which was received by Forestry Commission via email on 27 July 2018.

The Forestry Commission's summary points are:

- Ancient Woodlands[1] and Ancient or Veteran Trees[2] are acknowledged as an irreplaceable habitat and a part of our Historic Natural Heritage. Not all ancient woodland sites are registered on the Ancient Woodland Inventory. Small and linear ancient woodlands that may have not been included will have equally importance due to the ecological network they underpin.
- It is not possible to fully compensate for the loss of any irreplaceable habitat such as Ancient Woodlands, therefore, the Forestry Commission recommends:
    - doing everything possible to avoid the loss or damage to ancient woodland and veteran trees;
    - where this is not possible, a significant package of ecologically significant compensation, which collectively delivers ecological enhancement to our ancient woodlands and veteran tree infrastructure, is secured in perpetuity.
- Encourage 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. A scheme that bisects any woodland will not only result in significant loss of woodland cover, but will also negatively increase the ecological value and natural heritage impacts due to habitat fragmentation, and a huge negative impact on the natural plants and animals' ability to respond to the impacts of climate change.
- Include an assessment of any woodlands under an existing woodland grant scheme and / or a felling licence agreement to ensure these agreements will not be negatively impacted.

[1] An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS).
[2] A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

- Compensation and the use of buffer zones to enhance the resilience of neighbouring ancient woodlands. These zones could include further tree planting or a mosaic of semi-natural habitats.
- Encourage the design of the associate infrastructure (green space, woodlands, public footpaths and cycleways) to build on existing network of green infrastructure linking towns to the adjacent countryside. When combined with an assessment of the impacts on health & wellbeing, this will aid the promotion for local residents to access the countryside. There is a range of options for green infrastructure delivery and the Forestry Commission would draw your attention to what has already been achieved in just 10 years at Jeskyns[3].
- Embed an 'environmental net gain' principle for the scheme as promoted in the government's 25 Year Environment Plan.[4]
- Locally sourced timber is used in construction of appropriate structures.
- For the chosen option, the Forestry Commission would welcome the opportunity to provide advice at the appropriate time to ensure the most appropriate measures are adopted to minimise and / or compensate for the impacts on Ancient and other woodlands.

The Forestry Commission is the Government Department that works with others to protect, improve and expand our nation's forests and woodland, increasing their value to society and the environment. The Government's 25 Year Environment Plan[5] highlights that:

> "The value of natural capital is routinely understated. If we look at England's woods and forests, for example, as a national asset, using a natural capital approach, the value of the services they deliver is an estimated £2.3bn. Of this sizeable sum, according to a recent study, only a small proportion – 10% – is in timber values. The rest derives from other benefits provided to society, such as human recreation and carbon sequestration – the process by which trees lock-up and store carbon from the atmosphere."

The Forestry Commission is the Government expert on forestry & woodland and a statutory consultee (as defined by Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms And Procedures) Regulations 2009)[6] for major infrastructure (Nationally Significant Infrastructure Projects (NSIPS)) that are likely to affect the protection or expansion of forests and woodlands (Planning Act 2008)[7]. The Forestry Commission neither supports nor objects to development applications. Our role is to provide factual advice on forestry and woodland matters. It is the planning authority's responsibility to give or refuse permission, or to impose conditions.

The purpose of the Forestry Commission's response is to provide information on areas to be considered as part of the strategic environmental assessment process. We would welcome the opportunity to work with the applicant to identify appropriate measures that will avoid, reduce and / or compensate for significant effects to woodlands due to the construction and operation phases of this Scheme.

[3] https://www.forestry.gov.uk/jeskyns
[4] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf
[5] https://www.gov.uk/government/publications/25-year-environment-plan
[6] http://www.legislation.gov.uk/uksi/2009/2264/contents/made
[7] http://www.legislation.gov.uk/uksi/2009/2264/schedule/1/made

Chapter 1 Introduction

Climate change

The Forestry Commission notes the decision to scope out the environmental impacts on climate change of this scheme, although the water environment will be considered in Chapter 8.

As highlighted in Paragraph 2.2.8 of NPS EN-1:

> "To avoid the most dangerous impacts of climate change, the increase in average global temperatures must be kept to no more than 2°C, and that means global emissions must start falling as a matter of urgency. To drive the transition needed the Government has put in place the world's first ever legally binding framework to cut emissions by at least 80% by 2050, that will deliver emission reductions through a system of five year carbon budgets that will set a trajectory to 2050."

As recognised in the *Making Sure Our Land Plays a Central Role in Capturing Carbon and Enhancing Natural Capital* section of the Government's Clean Growth Strategy (Updated April 2018)[8]:

> "During the 2020s we need to accelerate the rate of tree planting, working towards our 12 per cent tree cover aspiration by 2060. To do this will require investment by the private and charitable sectors, not just government. A number of our policy proposals will create the conditions for that investment to come forward. We will need new skills in forest design, a reliable supply of resilient planting stock, new opportunities for domestic timber, and a new generation of skilled people helping to enhance our towns, cities and countryside. Recently published natural capital accounts by the Office for National Statistics show that Britain's woodlands provide services of £2.3 billion per year to the economy in terms of recreation, carbon sequestration, timber and air pollutant removal."

Therefore, the Forestry Commission would recommend that as part of the ES, 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, including greenhouse gases (GHG) which includes carbon dioxide. This will help to inform the compensation package required to ensure overall no net gain in GHG emissions and secure the UKs commitment to below 2 degrees Celsius, and be in alignment with the UKs Climate Change Act target of an 80% reduction by 2050.

To meet the Government's objective to improve woodlands' resilience to climate change and contribute to climate change adaptation, along with addressing climate change as part of the new requirements outlined in Part 2c, Regulation 14 of Infrastructure Planning (Environmental Impact Assessment) Regulations (2017), it is important that the applicant includes at least "a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment".[9]

As recognised in the European Commission Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment, "climate change and biodiversity are generally complex issues with long-term impacts and consequences. EIAs that aim to properly address biodiversity and climate should take this into account and assess the combined impact of any number of different effects. This requires an

[8] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/700496/clean-growth-strategy-correction-april-2018.pdf
[9] http://www.legislation.gov.uk/uksi/2017/572/regulation/14/made

understanding of evolving baseline trends and an assessment of the cumulative effects of the project on the changing baseline."[10]

To meet these requirements, the Forestry Commission would like to reiterate the importance of all woodlands in making our rural and urban landscapes more resilient to the effects of climate change and contribution to wider climate change adaptation. Consideration for how sustainable woodland creation and management of England's Woodlands can be secured and the use of timber as a construction material is utilised within this scheme will secure the role that woodlands have in reducing greenhouse emissions, carbon sequestration and contributing towards moving to a low carbon economy.

Chapter 7 Biodiversity

7.2 Legal and Policy Requirements

This section of the report highlights key policy and legislative documents of greatest relevance to biodiversity as part of the environmental statement for the scoping report.

In addition to the regulatory and policy framework outlined in the scoping report, the Forestry Commission considers the relevant documents and guidance notes outlined below as being pertinent to this DCO in relation to ancient woodland and veteran trees and should also be included in the report considerations.

The UK Forestry Standard (4th edition published August 2017).

Ancient woodland and veteran trees: protecting them from development (last updated January 2018)

National Planning Practice Guidance – Natural Environment Guidance (Published January 2016)

Government Forestry and Woodlands Policy Statement (Published January 2013)

Town and Country Planning Act (1990) Part 8, Chapter 1: General duty of planning authorities as respects trees: Section 197

Managing ancient and native woodland in England (last updated August 2016)

Keepers of Time – A Statement of Policy for England's Ancient and Native Woodland (published June 2005)

A Habitats Translocation Policy for Britain – (published July 2003)

The Clean Growth Strategy: Leading the way to a low carbon future (Updated April 2018)

A Green Future: Our 25 Year Plan to Improve the Environment (Updated February 2018)

Industrial Strategy White Paper "Building a Britain fit for the future" (Published November 2017)

Natural England Commissioned Report (NERC 132) Edition 3 (published November 2013)

European Commission Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment (published 2013)

[10] http://ec.europa.eu/environment/eia/pdf/EIA%20Guidance.pdf

BS 42020:2013 Biodiversity. Code of practice for planning and development (published August 2013)

Ancient and other veteran trees: further guidance on management (published February 2013)

Impacts of nearby development on ancient woodland – addendum (published December 2012)

BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations (published April 2012)

Biodiversity 2020: a strategy for England's wildlife and ecosystem services (published August 2011).

Natural Environment White Paper "The Natural Choice" (published June 2011)

'Making Space for Nature: A review of England's Wildlife Sites and Ecological Network' (the Lawton Report) (published September 2010)

Impacts of nearby development on the ecology of ancient woodland (published October 2008)

Veteran Trees: A guide to good management – (published February 2000)

The Forestry Commission also considers the relevant paragraphs and guidance notes outlined in the appendices below with respect to biodiversity in planning decisions as being pertinent to any DCO and should be included in a report prepared for considerations.

7.4 Likely Significant Effects

This section of the report outlines the process for scoping the ecological receptors to consider whether the anticipated potential impacts will have significant effects. The Forestry Commission welcomes the inclusion of ancient woodlands as a having a high value of ecological receptor, and woodland habitats listed under Section 41 of the NERC Act (2006) as medium value.

The Forestry Commission also acknowledges and appreciates that, through project design, there will be no loss of or fragmentation of ancient woodlands. Where blocks of ancient woodland are located immediately adjacent to, or within 15m of the Order Limits, the Forestry Commission would welcome the opportunity to work with the applicant to ensure direct and / or indirect impacts are avoided. Where this is not possible, to work with the applicant to secure a significant package of ecologically significant compensation to collectively deliver ecological enhancement to our ancient woodlands and veteran tree infrastructure in perpetuity.

For priority woodland habitats outside of designated sites, which includes hedgerows, lowland mixed deciduous woodland and wet woodlands, the Order Limit has been selected to either avoid or reduce impacts where possible. The Forestry Commission would welcome the opportunity to provide advice at the appropriate time to ensure the most appropriate measures are adopted to minimise and / or compensate for the impacts on Priority Woodland Habitats to ensure there is no overall net loss of woodland cover resulting from this scheme.

The Forestry Commission notes that in paragraph 7.4.21, the report has identified that potential habitat enhancement would include targeted heathland restoration. Halting and then reversing declines in biodiversity is one of the government's objectives.

Converting some types of woodland to open habitat can be good for several key species.

The overarching policy for the sustainable management of forests and woodlands in the UK is a presumption against the conversion of forest land to other land uses (deforestation) unless there's a compelling reason in the public interest for doing so. As a result, applications to convert woodland to open habitat must comply with government policy on when to convert woods and forests to open habitat in England[11].

7.5 Impact Assessment Methodology

In assessing this scheme, if the Planning Inspectorate decides to grant planning permission in line with the EN-1 NPS, NPPF and NPPG, it should seek appropriate compensation from the developer. As the government experts on forestry & woodland, the Forestry Commission would welcome the opportunity to discuss with the applicant options for addressing issues with regard to the scheme.

The Planning Inspectorate should use planning conditions or obligations to secure compensation measures and subsequent ecological monitoring. The joint Standing Advice, prepared by Forestry Commission and Natural England, provides advice and the assessment tools to be used when assessing the impacts of the scheme.

Where the impacts cannot be fully avoided, compensatory habitat provision will be required. The Forestry Commission would encourage the inclusion of measures to build the evolving network of green infrastructure to link the existing conurbations to adjacent countryside. Assessment of the impact of such positive inclusions should be part of the scoping of wider carbon balance and community health & wellbeing. This will aid the promotion of and help encourage people to access the countryside by the local community for quiet enjoyment – important factors for health and wellbeing, both physical and mental health. There are a range of options for green infrastructure and the Forestry Commission would bring attention to what has been achieved at Jeskyns[12]. Linking sites similar to the Jeskyns model to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of landscape scale green infrastructure.

Chapter 12 Land Use

12.3 Baseline Conditions

This section of the report outlines existing land uses. Paragraph 12.3.16 notes that within the Order Limit, there are areas of land under a Common Agricultural Policy (CAP) Scheme, then highlighting that Countryside Stewardship scheme closed to new applicants in 2014. However, a report published by the House of Commons[13], the UK Government has pledged to maintain CAP payments until 2022. Farmers and woodland owners are still able to apply for Countryside Stewardship[14] funding. Legacy grant schemes still eligible for grant payments for up to 40 years include Farm Woodland Scheme (FWS)[15] and Farm Woodland Premium Scheme (FWPS)[16]. Some woodlands which are not in a grant scheme may have a felling licence.

[11] https://www.gov.uk/government/publications/when-to-convert-woods-and-forests-to-open-habitat-in-england-march-2010
[12] https://www.forestry.gov.uk/jeskyns
[13] https://www.parliament.uk/documents/commons-library/Brexit-UK-agriculture-policy-CBP-8218.pdf
[14] https://www.gov.uk/government/collections/countryside-stewardship-get-paid-for-environmental-land-management
[15] https://www.forestry.gov.uk/forestry/infd-6zcgfz
[16] https://www.forestry.gov.uk/forestry/infd-6zcfxq

A desktop assessment of the route has highlighted there may be occasions where the route may run along a boundary of, or intersect with a site under a CAP funded woodland grant scheme, or a woodland with a felling licence agreement. Where this occurs, there may be impacts on the grant, and / or the felling license agreements. Therefore, it may be prudent to ensure all woodland related grant schemes and woodlands with a felling license are assessed and where appropriate included in *Table 12.9 Matters of significance for land use*.

Appendix 3 Environmental Survey Methodology Report

Section 4 Arboricultural Survey Strategy

The proposed arboricultural survey aims to capture data on woodland, veteran/ancient tree and notable/mature trees likely to be affected by the project. Once again, the Forestry Commission welcomes the recognition and inclusion of ancient woodlands and veteran trees as part of this assessment.

The Woodland Condition Assessment (WCA) guidance and forms[17] available on the Forestry Commission's website have been developed by the England Woodland Biodiversity Group. This WCA is suitable for your arboricultural consultants to use as it is broad in scope and suitable for use with all woodland types. If a BS5837:2012 Cascade chart[18] is used to carry out a tree quality assessment, ancient woodland sites would automatically be classified as A3 due to their natural heritage and ecological value.

Therefore, the Forestry Commission would recommend that impacts to all woodlands are assessed to allow an in-depth appreciation of the beneficial and adverse environmental consequences at the geographic scale of the Scheme. From these results, the Forestry Commission will be able to work with the applicant to identify appropriate measures that will avoid, reduce and / or compensate for significant effects to woodlands due to the construction and operation phases of the Scheme.

Conclusion:

The Forestry Commission advise that in respect of loss of any woodland, particularly the loss or harm of irreplaceable and principally important habitats and ecosystems must be included in the test of public benefit to demonstrate accurately that the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm.

For the loss of any woodland, the Forestry Commission would ask:

1. To explore with you how this loss could be further reduced and how direct and indirect impacts on ancient woodlands can be minimised;
2. It is made clear how creation of new woodland will be targeted to compensate for the loss of all trees and woodlands;
3. That the applicant engages with the Forestry Commission at the earliest opportunity so that our expertise can be used to support the development of options and design of the chosen way forwards.

[17] https://www.forestry.gov.uk/england-hs2
[18] http://www.flac.uk.com/wp-content/uploads/2012/09/Table-1_flac.pdf

Outlined above are the key areas of information would be required in order to allow the applicant to proceed with delivery of this scheme with least detrimental impact to the surrounding environment. Also for the Examining Authority properly to undertake its task or where further work is required to determine the effects of the project and/or to flesh out compensation proposals to provide a sufficient degree of confidence as to their efficacy.

Forestry Commission's headline points are that on the basis of the information submitted, if approved, the project must be subject to all necessary and appropriate requirements which ensure that unacceptable environmental impacts either do not occur or are sufficiently compensated, as proposed in the proposed Code of Construction Practice.

If you have any further questions, then please do not hesitate to consult the Forestry Commission.

Yours sincerely,

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Appendix 1: Overarching National Policy Statement for Energy (EN-1)

Part 1 Introduction

1.1.2 The Planning Act 2008 also requires that the IPC must decide an application for energy infrastructure in accordance with the relevant NPSs except to the extent it is satisfied that to do so would:

- lead to the UK being in breach of its international obligations;
- be in breach of any statutory duty that applies to the IPC;
- be unlawful;
- result in adverse impacts from the development outweighing the benefits; or
- be contrary to regulations about how its decisions are to be taken.

1.4.2 The Planning Act 2008 sets out the thresholds for nationally significant infrastructure projects (NSIPs) in the energy sector. The Act empowers the IPC to examine applications and make decisions on the following nationally significant energy infrastructure projects:

- large gas reception and liquefied natural gas (LNG) facilities and underground gas storage facilities (meeting the thresholds set out in the Planning Act 2008, and explained in detail in Section 1.7 of the gas supply infrastructure and gas and oil pipelines NPS (EN-4)). For this infrastructure EN-1 in conjunction with EN-4 will be the primary basis for IPC decision making; and
- cross-country gas and oil pipelines and Gas Transporter pipelines (meeting the thresholds and conditions set out in the Planning Act 2008 and Section 1.7 of EN-4). For this infrastructure EN-1 in conjunction with EN-4 will be the primary basis for IPC decision making.

1.7.1 All the energy NPSs have been subject to an Appraisal of Sustainability (AoS), as required by the Planning Act 2008. The AoSs also incorporate the analysis of likely significant environmental effects required by the Strategic Environmental Assessment (SEA) Directive (2001/42/EC). ... The purposes and methods of the AoSs are explained in the revised draft of the AoS for EN-1. Their primary function is to inform consultation on the draft NPSs by providing an analysis of the environmental, social and economic impacts of implementing the energy NPSs by granting development consents for large-scale energy infrastructure projects in accordance with them.

1.7.2 Some key points from the AoS for EN-1 are set out below.

- The energy NPSs should speed up the transition to a low carbon economy and thus help to realise UK climate change commitments sooner than continuation under the current planning system. However there is also some uncertainty as it is difficult to predict the mix of technology that will be delivered by the market against the framework set by the Government.
- The energy NPSs are likely to contribute positively towards improving the vitality and competitiveness of the UK energy market by providing greater clarity for developers which should improve the UK's security of supply and, less directly, have positive effects for health and well-being in the medium to longer term through helping to secure affordable supplies of energy and minimising fuel poverty; positive medium and long term effects are also likely for equalities.
- The development of new energy infrastructure, at the scale and speed required to meet the current and future need, is likely to have some negative

effects on biodiversity, landscape/visual amenity and cultural heritage. However the significance of these effects and the effectiveness of mitigation possibilities is uncertain at the strategic and non-locationally specific level at which EN-1 to EN-5 are pitched. Short-term construction impacts are also likely through an increased use of raw materials and resources and negative effects on the economy due to impacts on existing land and sea uses. In general, it should be possible to mitigate satisfactorily the most significant potential negative effects of new energy infrastructure consented in accordance with the energy NPSs, and they explain ways in which this can be done; however, the impacts on landscape/visual amenity in particular will sometimes be hard to mitigate.

1.7.3 There may also be cumulative negative effects on water quality, water resources, flood risk, coastal change and health at the regional or subregional levels depending upon location and the extent of clustering of new energy and other infrastructure. Proposed energy developments will still be subject to project level assessments, including Environmental Impact Assessment, and this will address locationally specific effects. The energy NPSs set out mitigation for cumulative negative effects by requiring the IPC to consider accumulation of effects as a whole in their decision-making on individual applications for development consent.

1.7.13 Habitats Regulation Assessments (HRA) have been carried out and published for the non-locationally specific NPSs EN-1 to EN-5 and for EN-6 which does specify sites suitable for development. As EN-1 to EN-5 do not specify locations for energy infrastructure, the HRA is a high-level strategic overview. Although the lack of spatial information within the EN-1 to EN-5 made it impossible to reach certainty on the effect of the plan on the integrity of any European Site, the potential for proposed energy infrastructure projects of the kind contemplated by EN-1 to EN-5 to have adverse effects on the integrity of such sites cannot be ruled out. The HRA explains why the Government considers that EN-1 to EN-5 are, nevertheless, justified by imperative reasons of overriding public interest, while noting that its conclusions are only applicable at the NPS level and are without prejudice to any project-level HRA, which may result in the refusal of consent for a particular application.

Part 2 Government policy on energy and energy infrastructure development

2.2.4 Not all aspects of Government energy and climate change policy will be relevant to IPC decisions or planning decisions by local authorities, and the planning system is only one of a number of vehicles that helps to deliver Government energy and climate change policy. The role of the planning system is to provide a framework which permits the construction of whatever Government – and players in the market responding to rules, incentives or signals from Government – have identified as the types of infrastructure we need in the places where it is acceptable in planning terms. It is important that, in doing this, the planning system ensures that development consent decisions take account of the views of affected communities and respect the principles of sustainable development.

2.2.8 To avoid the most dangerous impacts of climate change, the increase in average global temperatures must be kept to no more than 2°C, and that means global emissions must start falling as a matter of urgency. To drive the transition

needed the Government has put in place the world's first ever legally binding framework to cut emissions by at least 80% by 2050, that will deliver emission reductions through a system of five year carbon budgets that will set a trajectory to 2050.

2.2.9 To prepare for the impacts of climate change, the Climate Change Act 2008 also sets out a statutory framework for adapting to climate change, with the Government committed to producing a statutory climate change adaptation programme in 2012 (which will be updated on five-yearly cycles). To lead and co-ordinate work in preparation for this, the Government has established the Adapting to Climate Change Programme, which includes:

- undertaking a UK Climate Change Risk Assessment; and
- using the "Adaptation Reporting Power" to require certain public bodies and statutory undertakers to set out the risks to their work from a changing climate and what they are doing to manage these risks.

2.2.10 Alongside this, the Government is committed to ensuring that adaptation needs are built into planning and risk management now to ensure the continued and improved success of businesses and new energy NSIPs. Section 4.8 of this NPS sets out how applicants and the IPC should take the effects of climate change into account when developing and consenting infrastructure.

Part 3 The need for new nationally significant energy infrastructure projects

3.4.2 Large scale deployment of renewables will help the UK to tackle climate change, reducing the UK's emissions of carbon dioxide by over 750 million tonnes by 2030. It will also deliver up to half a million jobs by 2020 in the renewables sector. Renewable electricity generation is currently supported in the UK through the Renewables Obligation (RO), which is a market-based support mechanism to encourage investment. Renewables have potential to improve security of supply by reducing reliance on the use of coal, oil and gas supplies to keep the lights on and power our businesses. Meeting the 15% renewables target could reduce fossil fuel demand by around 10% and gas imports by 20-30%. We are committed to meeting 2020 targets and have further ambitions for renewables post-2020. The Committee on Climate Change's May 2011 report included advice on moving to 30% renewable energy capacity by 2030 and a central scenario of 40% renewable electricity.

3.4.4 Biomass and EfW can be used to generate 'dispatchable' power, providing peak load and base load electricity on demand. As more intermittent renewable electricity comes onto the UK grid, the ability of biomass and EfW to deliver predictable, controllable electricity is increasingly important in ensuring the security of UK supplies.

3.4.5 Paragraph 3.4.1 above sets out the UK commitments to sourcing 15% of energy from renewable sources by 2020. To hit this target, and to largely decarbonise the power sector by 2030, it is necessary to bring forward new renewable electricity generating projects as soon as possible. The need for new renewable electricity generation projects is therefore urgent.

Part 4 Assessment Principles

4.1.3 In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the IPC should take into account:

- its potential benefits including its contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and
- its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.

4.1.4 In this context, the IPC should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels. These may be identified in this NPS, the relevant technology-specific NPS, in the application or elsewhere (including in local impact reports).

4.2.1 All proposals for projects that are subject to the European Environmental Impact Assessment Directive74 must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project75. The Directive specifically refers to effects on human beings76, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. The Directive requires an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects.

4.2.2 To consider the potential effects, including benefits, of a proposal for a project, the IPC will find it helpful if the applicant sets out information on the likely significant social and economic effects of the development, and shows how any likely significant negative effects would be avoided or mitigated. This information could include matters such as employment, equality, community cohesion and well-being.

4.2.6 The IPC should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.

4.2.9 Should the IPC determine to grant development consent for an application where details are still to be finalised, it will need to reflect this in appropriate development consent requirements. Clearly, if development consent is granted for a proposal and at a later stage the developer wishes for technical or commercial reasons to construct it in such a way that its extent will be greater than has been provided for in the terms of the consent, it may be necessary to apply for a change to be made to the development consent, and the application to change the consent may need to be accompanied by further environmental information to supplement the original ES.

4.3.1 Prior to granting a development consent order, the IPC must, under the Habitats and Species Regulations79, (which implement the relevant parts of the Habitats Directive and the Birds Directive80 in England and Wales) consider whether the project may have a significant effect on a European site, or on any site to which the same protection is applied as a matter of policy, either alone or in

combination with other plans or projects. Further information on the requirements of the Habitats and Species Regulations can be found in a Government Circular81. Applicants should also refer to Section 5.3 of this NPS on biodiversity and geological conservation. The applicant should seek the advice of Natural England and/or the Countryside Council for Wales, and provide the IPC with such information as it may reasonably require to determine whether an Appropriate Assessment is required. In the event that an Appropriate Assessment is required, the applicant must provide the IPC with such information as may reasonably be required to enable it to conduct the Appropriate Assessment. This should include information on any mitigation measures that are proposed to minimise or avoid likely effects.

4.4.1 As in any planning case, the relevance or otherwise to the decision-making process of the existence (or alleged existence) of alternatives to the proposed development is in the first instance a matter of law, detailed guidance on which falls outside the scope of this NPS. From a policy perspective this NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option.

4.4.2 However:

- applicants are obliged to include in their ES, as a matter of fact, information about the main alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility;
- in some circumstances there are specific legislative requirements, notably under the Habitats Directive, for the IPC to consider alternatives. These should also be identified in the ES by the applicant; and
- in some circumstances, the relevant energy NPSs may impose a policy requirement to consider alternatives (as this NPS does in Sections 5.3, 5.7 and 5.9).

4.8.5 New energy infrastructure will typically be a long-term investment and will need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure. The ES should set out how the proposal will take account of the projected impacts of climate change. While not required by the EIA Directive, this information will be needed by the IPC.

4.8.6 The IPC should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change using the latest UK Climate Projections available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure. Should a new set of UK Climate Projections become available after the preparation of the ES, the IPC should consider whether they need to request further information from the applicant.

Part 5 Generic Impacts

5.3.1 Biodiversity is the variety of life in all its forms and encompasses all species of plants and animals and the complex ecosystems of which they are a part.

Geological conservation relates to the sites that are designated for their geology and/or their geomorphological importance.

5.3.3 Where the development is subject to EIA the applicant should ensure that the ES clearly sets out any effects on internationally, nationally and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity. The applicant should provide environmental information proportionate to the infrastructure where EIA is not required to help the IPC consider thoroughly the potential effects of a proposed project.

5.3.4 The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.

5.3.7 As a general principle, and subject to the specific policies below, development should aim to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives (as set out in Section 4.4 above); where significant harm cannot be avoided, then appropriate compensation measures should be sought.

5.3.14 Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The IPC should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location outweigh the loss of the woodland habitat. Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons why.

5.3.18 The applicant should include appropriate mitigation measures as an integral part of the proposed development. In particular, the applicant should demonstrate that:

- during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works;
- during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements;
- habitats will, where practicable, be restored after construction works have finished; and
- opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals.

Appendix 2: National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4)

Part 1 Introduction

1.2.1 This National Policy Statement (NPS), taken together with the 'Overarching National Policy Statement for Energy' (EN-1), provides the primary basis for decisions by the Infrastructure Planning Commission (IPC) on applications it receives for gas supply infrastructure and gas and oil pipelines as defined at Section 1.8. The way in which NPSs guide NPS decision making and the matters which the IPC is required by the Planning Act 2008 to take into account in considering applications are set out in Sections 1.1 and 4.1 of EN-1.

Part 2 Assessment and Technology-Specific Information

2.21.1 Sections 4.3 and 5.9 of EN-1 sets out the general principles that should be applied in the assessment of biodiversity and landscape and visual impacts. Additional considerations apply during the construction of a pipeline (which, without mitigation, can affect both landscape and ecology). These comprise the effect upon specific landscape elements within and adjacent to the pipeline route, such as grasslands, field boundaries (hedgerows, hedgebanks, drystone walls, fences), trees, woodlands, and watercourses. There will also be temporary visual impacts caused by the need to access the working corridor and to remove flora and soil. The working width of the pipeline will vary depending on the surrounding terrain. Temporary impacts could include large excavations where deep pits are needed for boring beneath rivers, roads and sensitive features.

2.21.3 The ES should include an assessment of the biodiversity and landscape and visual effects of the proposed route and of the main alternative routes considered (see Section 5.9 of EN-1). The application should also include proposals for reinstatement of the pipeline route as close to its original state as possible and take into account any requirements for agreements with the landowner to access areas for aftercare and management work. Where it is unlikely to be possible to restore landscape to its original state, the applicant should set out measures to avoid, mitigate, or employ other landscape measures to compensate for, any adverse effect on the landscape.

2.21.6 In circumstances where the habitat to be crossed contains ancient woodland, trees subject to a Tree Preservation Order, or hedgerows subject to the Hedgerows Regulations 1997, the applicant should consider whether it would be feasible to use horizontal direct drilling under the ancient woodland or thrust bore under the protected tree or hedgerow and the IPC should consider requiring this, where not included in the proposal.

2.23.1 New pipelines will be installed in a variety of geological conditions. It will be important for applicants to understand the soil types and the nature of the underlying strata. Underground cavities and unstable ground conditions may present particular risks to pipeline projects. Impacts could include sterilisation of mineral resources or loss of soil quality.

2.23.2 Applicants should assess the stability of the ground conditions associated with the pipeline route and incorporate the findings of that assessment in the ES (see

Section 4.2 of EN-1) as appropriate. Desktop studies, which include known geology and previous borehole data, can form the basis of the applicant's assessment. The applicant may find it necessary to sink new boreholes along the preferred route to better understand the ground conditions present. The assessment should cover the options considered for installing the pipeline and weigh up the impacts of the means of installation. Where the applicant proposes to use horizontal directional drilling (HDD) as the means of installing a pipeline under a National or European Site and mitigating the impacts, the assessment should cover whether the geological conditions are suitable for HDD.

2.23.7 Mitigation measures to minimise any adverse effects on soil and geology should include measures to ensure that residual impacts on the surface are minor, for example some differential vegetation growth. Mitigation measures should include appropriate treatment of soil (and in particular topsoil) during site construction and other infrastructure activity (and appropriate soil storage and reinstatement in line with the principles and practices outlined in the Code of Practice for the Sustainable Management of Soils on Construction Sites8. The IPC should consider what appropriate conditions should be attached to any consent.

Appendix 3: National Planning Policy Framework 2012

The National Planning Policy Framework (NPPF) set out the Government's planning policies for England and how these are expected to be applied by Local Authorities within their Local Development Frameworks (LDF).

Achieving Sustainable Development:

Chapter 10: Meeting the challenge of climate change, flooding and coastal change

93 *Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.*

99 *Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.*

Chapter 11: Conserving and enhancing the natural environment

109 *The planning system should contribute to and enhance the natural and local environment by:*

- *Protecting and enhancing valued landscapes, geological conservation interests and soils;*
- *Recognising the wider benefits of ecosystem services; and*
- *Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.*

114 *Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.*

117 *Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. To minimise impacts on biodiversity and geodiversity, planning policies should:*

- *Plan for biodiversity at a landscape-scale across local authority boundaries; identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*

- *Promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan; and, _ Aim to prevent harm to geological conservation interests; and where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas.*

118 *When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:*

- *If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.*
- *Proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly*
- *outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;*
- *Development proposals where the primary objective is to conserve or enhance biodiversity should be permitted;*
- *Opportunities to incorporate biodiversity in and around developments should be encouraged; and,*
- ***Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss****; and.*
- *the following wildlife sites should be given the same protection as European sites:*
  - *potential Special Protection Areas and possible Special Areas of Conservation;*
  - *listed or proposed Ramsar sites; and*
  - *sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.*

119 *The presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.*

Plan-making

Local Plans

157*. Crucially, Local Plans should:*

- *plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;*

- *be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;*
- *be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;*
- *indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;*
- *allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;*
- *identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;*
- *identify land where development would be inappropriate, for instance because of its environmental or historic significance; and*
- *contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.*

Environment

***165**. Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans. Working with Local Nature Partnerships where appropriate, this should include an assessment of existing and potential components of ecological networks. A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.*

Appendix 4: National Planning Practice Guidance

As highlighted in the Natural Environment section of the NPPG under Biodiversity and ecosystems, the Forestry Commission consider the following sections to be relevant:

What are local ecological networks and what evidence should be taken into account in identifying and mapping them?
The components of an ecological network are explained at section 2.12 of the Natural environment white paper[19].
Relevant evidence in identifying and mapping local ecological networks includes:

- *the broad geological, geomorphological and bio-geographical character of the area, creating its main landscapes types;*
- *key natural systems and processes within the area, including fluvial and coastal;*
- *the location and extent of internationally, nationally and locally designated sites;*
- *the distribution of protected and priority habitats and species[20];*
- *areas of irreplaceable natural habitat[21], such as ancient woodland or limestone pavement, the significance of which may be derived from habitat age, uniqueness, species diversity and/or the impossibilities of re-creation;*
- *habitats where specific land management practices are required for their conservation;*
- *main landscape features which, due to their linear or continuous nature, are important for the migration, dispersal and genetic exchanges of plants and animals, including any potential for new habitat corridors to link any isolated sites that hold nature conservation value, and therefore improve species dispersal;*
- *areas with potential for habitat enhancement or restoration, including those necessary to help biodiversity adapt to climate change or which could assist with the habitats shifts and species migrations arising from climate change;*
- *an audit of green space within built areas and where new development is proposed;*
- *information on the biodiversity and geodiversity value of previously developed sites and the opportunities for incorporating this in developments; and*
- *areas of geological value which would benefit from enhancement and management.*

How are ecosystems services taken into account in planning?
The National Planning Policy Framework states that the planning system should recognise the wider benefits of ecosystem services. Information about ecosystems services is in Biodiversity 2020: A strategy for England's biodiversity and ecosystems services[22]. An Introductory guide to valuing ecosystems services[23] has also been published by Defra along with a practice guide, which could, where appropriate, inform plan-making and decision-taking on planning applications. The National pollinator strategy: for bees and other pollinators in England[24] is a 10 year plan to protect

[19] https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature
[20] https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications
[21] https://www.gov.uk/guidance/protected-sites-and-areas-how-to-review-planning-applications
[22] https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services
[23] https://www.gov.uk/government/publications/an-introductory-guide-to-valuing-ecosystem-services
[24] https://www.gov.uk/government/publications/national-pollinator-strategy-for-bees-and-other-pollinators-in-england

pollinating insects which support our food production and the diversity of our environment.

(Relevant to NPPF paragraph 109)

How can I find out whether an area is 'ancient woodland'?
A starting point to establish whether an area is ancient woodland is to look at the relevant ancient woodland inventory. These inventories comprise county maps of sites (generally greater than 2 hectares) that are thought to have been continuously wooded since 1600 AD. The national inventory[25] is published and updated by Natural England. Both Ancient Semi-Natural Woodland (ASNW) as well as Plantations on Ancient Woodland Sites (PAWS) are ancient woodland. Both types should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework.[26]

How can I find out whether trees that could be affected by a development proposal are 'aged or veteran' trees?
Guidance on the features and importance of veteran trees[27] is provided by Natural England. Local Records Centres and other organisations with an interest in trees may be able to advise on the location of known veteran trees.

(Relevant to NPPF paragraph 118)

[25] http://www.gis.naturalengland.org.uk/pubs/gis/tech_aw.htm
[26] https://www.gov.uk/guidance/natural-environment#biodiversity-and-ecosystems
[27] http://publications.naturalengland.org.uk/publication/75035

Appendix 5: other relevant policies and documents

The Clean Growth Strategy: Leading the way to a low carbon future[28] (Updated April 2018)
Page 107: What is natural capital? "Natural capital enables us to think about our natural environment and the countryside as a set of valuable assets (for example, forests, clean air, soils, species, freshwaters, oceans and minerals). Like any asset, natural capital, if maintained and invested in, provides flows of services to the economy and society. These include food, energy, carbon sequestration, pollutant removal, flood risk reduction, recreational and educational opportunities, health benefits and many others."
Paragraph 7: "During the 2020s we need to accelerate the rate of tree planting, working towards our 12 per cent tree cover aspiration by 2060. … Recently published natural capital accounts by the Office for National Statistics show that Britain's woodlands provide services of £2.3 billion per year to the economy in terms of recreation, carbon sequestration, timber and air pollutant removal."

A Green Future: Our 25 Year Plan to Improve the Environment[29] (Updated February 2018)
Foreword from the Prime Minister: "Our natural environment is our most precious inheritance. The United Kingdom is blessed with a wonderful variety of natural landscapes and habitats and our 25 Year Environment Plan sets out our comprehensive and long-term approach to protecting and enhancing them in England for the next generation. … By using our land more sustainably and creating new habitats for wildlife, including by planting more trees, we can arrest the decline in native species and improve our biodiversity."
Foreword from the Secretary of State: "Respecting nature's intrinsic value, and the value of all life, is critical to our mission. For this reason we safeguard cherished landscapes from economic exploitation, protect the welfare of sentient animals and strive to preserve endangered woodland and plant life, not to mention the greening of our urban environments. … We need to replenish depleted soil, plant trees, support wetlands and peatlands, rid seas and rivers of rubbish, reduce greenhouse gas emissions, cleanse the air of pollutants, develop cleaner, sustainable energy and protect threatened species and habitats."
Page 19: "The value of natural capital is routinely understated. If we look at England's woods and forests, for example, as a national asset, using a natural capital approach, the value of the services they deliver is an estimated £2.3bn. Of this sizeable sum, according to a recent study, only a small proportion – 10% – is in timber values. The rest derives from other benefits provided to society, such as human recreation and carbon sequestration – the process by which trees lock-up and store carbon from the atmosphere."
Page 47: "We will increase tree planting by creating new forests, and incentivising extra planting on private and the least productive agricultural land, where appropriate. This will support our ambition to plant 11m trees. … We will not focus solely on planting, however; we will also support increased protection of existing trees and forests. … Beyond the economic benefits, the Government recognises the significant heritage value and irreplaceable character of ancient woodland and veteran trees. We are committed to ensuring stronger protection of our ancient woodlands, making sure

[28] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/700496/clean-growth-strategy-correction-april-2018.pdf
[29] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

they are sustainably managed to provide a wide range of social, environmental, societal and economic benefits."

Industrial Strategy White Paper "Building a Britain fit for the future"[30]
(Published November 2017)
Page 43: "We also want everyone to feel the benefits of clean growth, so we will work to create a future where our cities benefit from cleaner air, our businesses from enhanced resource security and our countryside from regenerated natural capital."
Page 135: "We will work not just to preserve, but to enhance our natural capital – the air, water, soil and ecosystems that support all forms of life – since this is an essential basis for economic growth and productivity over the long term."
Page 148: "We are committed to moving towards a more circular economy – to raising productivity by using resources more efficiently, to increasing resilience by contributing to a healthier environment, and to supporting long-term growth by regenerating our natural capital."

The UK Forestry Standard[31] (4th edition published August 2017)
Page 22-23 "Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance SLNCIs).

Natural England Commissioned Report (NERC 132) Edition 3: Literature review and analysis of the effectiveness of mitigation measures to address environmental impacts of linear transport infrastructure on protected species and habitats[32] (Published November 2013)
Contents: "translocation of ancient woodland soils and coppiced stools does not imply that these methods mitigate the loss of ancient woodland. Ancient woodland is an irreplaceable resource, the loss of which cannot be mitigated or compensated."
Table 4.1: the measure should not be interpreted as a successful means of mitigating the fragmentation of ancient woodland; a resource which cannot be re-created through tree planting or habitat translocation due to its complex structure and wider-ranging biodiversity.

Government Forestry and Woodlands Policy Statement: Incorporating the Government's Response to the Independent Panel on Forestry's Final Report[33]
(Published January 2013)
Page 10: "New and better managed woodland also has a role in making our rural and urban landscapes more resilient to the effects of climate change. Our objectives for sustainable woodland creation and management will improve woodlands' resilience to climate change and other threats and enhance its contribution to wider climate change adaptation. Carbon will be sequestered through the growth of new woodlands. The wood products that are harvested from England's woodlands will help to reduce greenhouse emissions from the energy sector directly as woodfuel and from other sectors where timber replaces more energy intensive materials. In addition, our focus

30 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/664563/industrial-strategy-white-paper-web-ready-version.pdf
31 https://www.forestry.gov.uk/ukfs
32 http://publications.naturalengland.org.uk/publication/6184646404472832
33 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221023/pb13871-forestry-policy-statement.pdf

on protection will help to ensure that we can safeguard the large store of carbon in England's woodlands."

BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations[34] (published April 2012)
Trees are important elements of green infrastructure, contributing to urban cooling through evapotranspiration and providing micro-climatic effects that can reduce energy demands in buildings. They therefore represent a key resource that can significantly contribute to climate change adaptation.

Biodiversity 2020: a strategy for England's wildlife and ecosystem services[35] (published August 2011).
Paragraph 2.16 - Further commitments to protect ancient woodland and to continue restoration of Plantations on Ancient Woodland Sites (PAWS).

Natural Environment White Paper "The Natural Choice"[36] (published June 2011)
Paragraph 2.53 - This has a "renewed commitment to conserving and restoring ancient woodlands".
Paragraph 2.56 – "The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites".

Natural Environment and Rural Communities Act 2006[37] (published October 2006)
Section 40(1) imposes a duty to conserve biodiversity:

> "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity."

Section 40(3) of the Act explains that:

> "Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat".

The duty applies to all public body (including government departments and local authorities) and extends beyond just conserving what is already there to carrying out, supporting and requiring actions that may also restore or enhance biodiversity.

Keepers of Time[38] (published June 2005)
A Statement of Policy for England's Ancient and Native Woodland.
Page 10 "The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland".

A Habitats Translocation Policy for Britain[39] (published July 2003)
"Available information shows that it is not possible to move species assemblages without substantial changes taking place in the structure of the habitat and its species composition, thus rendering the translocation unsuccessful."

[34] https://shop.bsigroup.com/ProductDetail/?pid=000000000030213642
[35] https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services
[36] https://www.gov.uk/government/news/natural-environment-white-paper-discussion-document-record-response
[37] http://www.legislation.gov.uk/ukpga/2006/16/section/40
[38] https://www.forestry.gov.uk/keepersoftime
[39] http://jncc.defra.gov.uk/pdf/habitats_policy.pdf

Town and Country Planning Act (1990)[40]

Section 197 Planning permission to include appropriate provision for preservation and planting of trees.

"It shall be the duty of the local planning authority—

(a) to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees; and

(b) to make such orders under section 198 as appear to the authority to be necessary in connection with the grant of such permission, whether for giving effect to such conditions or otherwise."

[40] https://www.legislation.gov.uk/ukpga/1990/8/section/197

FROYLE PARISH COUNCIL

Please reply to
The Clerk, c/o Crabtree Gate, Well Lane, Lower Froyle, Hampshire, GU34 4LR
01420 520102
froyleparishclerk@yahoo.co.uk

15th August 2018
Your ref EN070005_000008_270718
Our ref 8 18-19

The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol, BS1 6PN
For the attention of
Marie Shoesmith
Senior EIA and Land Rights Advisor
SouthamptontoLondonPipeline@pins.gsi.gov.uk

Dear Sirs

Application by Esso Petroleum Company, Limited (the Applicant) for an Order granting Development Consent for the Southampton to London Pipeline Project (the Proposed Development)

Thank you for your letter of 27th July.

Froyle Parish Council considers that the following information should be provided in the Environmental Statement:

> Regarding the wildlife pond near Gid Lane (Upper Froyle), in June 2018 a professional newt survey (for the Esso pipeline) of the wildlife pond found 3 Great Crested newts + immature, 4 smooth newts + immature, 1 common frog. This confirms what had already been seen there, ie a new breeding pond.
> The results of this survey should ensure that appropriate measures are taken during the construction of the pipeline to avoid damage to protected species and their habitats. This may include erection of a temporary newt fence or working only in the winter (when newts are hibernating).
> There is also a wildflower meadow about 15m from the wildlife pond, above an existing Southern Gas Networks pipeline.

Yours faithfully
P. Cullen Stephenson
Clerk, Froyle Parish Council

Esso Southampton to Heathrow Pipeline

Hampshire Archaeology response to Project Scoping Report: Chapter 9 – Historic Environment

Overall the Scoping Document is sound and sets out the planned structure of the Cultural Heritage Chapter of a future EIA in an industry-standard method. I have identified a number of minor issues in the text of the chapter, together with one very significant issue regarding the proposed strategy for archaeological field assessment.

Paragraph 9.1.7: The word 'archaeology' should be replaced with the word 'Archaeologists'

Paragraphs 9.2.7-9: The reference to NPPF needs to be updated from Chapter 12 to Chapter 16 (2018). All referenced paragraph numbers need to be updated in line with this revised chapter.

Paragraph 9.3.13: The Scoping Report divides all assets up into two regions, those within 300 metres of the pipeline route and those within 1km. It would have been useful for the report to also have a section for those assets that lie within the easement of the proposed route and will be directly impacted by the construction works. I assume that this group will be assessed fully in the EIA chapter?

Paragraph 9.5.5: There is a reference to archaeological trial trenching being carried out if required. Archaeological trial trenching prior to development will *certainly* be required. This paragraph needs to be re-written to reflect the necessity of this stage of works.

Paragraph 9.5.8: The proposed extent of the Geophysical Survey would need to be discussed with the archaeological advisors to both HCC and SDNPA prior to any Written Scheme of Investigation being prepared.

Paragraph 9.5.9: While the trial trenching stage of evaluation can be guided by the results of the geophysical survey, these results should not be used as the determining factor as to whether any trenching takes place at all, which appears to be the impression given by this paragraph. Geophysical survey is a useful tool but it is limited in what it can detect (limited by geology and ground water conditions among other things) and there may be substantial and significant features and deposits that it will miss. It would be unwise to leave these 'blank' areas out of the evaluation stage as exposing large or significant sites during the construction phase would lead to very costly delays in the program. It would be more prudent to thoroughly assess the archaeological potential of the route prior to construction so that any archaeological issues are fully mitigated and do not hold the easement stripping and trenching. I would like to see the EIA set out a 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.

Havant BOROUGH COUNCIL

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Hampshire PO9 2AX

T 023 9247 4174
F 023 9248 0263

www.havant.gov.uk

Mr M Breslaw
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Our Ref: GEN/18/00768
Direct Line: (023) 92 446263
Ask For: Mr L Oliver
Email: planning.development@havant.gov.uk

23 August 2018

Site Location: Southampton to London Pipeline
Re: EIA Scoping Notification and Consultation

Dear Sir,

Thank you for consulting Havant Borough Council on the Southampton to London Pipeline. Given the distance of the pipeline from the boundary of Havant Borough Council, we have no comment to make.

Yours faithfully

Mr L Oliver
Principal Planner
Our Ref: GEN/18/00768

From:	Gregory, Andree
To:	Southampton to London Pipeline Project
Cc:	Planning SE
Subject:	#5561 Response - Southampton to London Pipeline
Date:	23 August 2018 15:21:19

For the attention of: Michael Breslaw

Site: Southampton to London Pipeline

Development: EIA Scoping Request

Highways England's Ref No: 5561

Dear Michael Breslaw,

Thank you for your consultation letter dated 27th July 2018 on the above EIA scoping request for the proposed Southampton to London Pipeline. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England have no comment on whether an EIA is required; but if it is (or is produced voluntarily), it should be compatible and consistent with the Transport Assessment that should also be submitted as part of this application and also contain information on all transport related effects including noise, vibration and air quality.

The proposed method of assessment for the EIA should be in line with Highways England's recommended method of drawing upon the information presented in the Transport Assessment. Any assessment should be undertaken in accordance with the DfT Circular 02/2013 "The Strategic Road Network and the Delivery of Sustainable Development" outlining how Highways England will engage with developers including assessment requirements to deliver growth and safeguard the operation of the SRN.

In the case of Southampton to London Pipeline, Highways England is interested in the potential impact that the construction trips might have upon the M25 and A30. We 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. The project of this magnitude has the potential to generate a significant number of heavy goods vehicle (HGV) trips, a large proportion of which are likely use the SRN. The proposals should be supported by a Transport Assessment; although individual sites within set corridor might not have a significant impact, cumulatively, the project could still have the potential to impact the SRN, particularly road safety. In general we would be concerned with an

increase in slow moving HGV's accessing the SRN and the resulting potential impact to the safe and efficient operation of SRN. In order to minimise potential impacts to the SRN we would look to site operators to identify opportunities to reduce trips during peak periods, this might be through construction and operational management plans to support individual sites within identified corridor.

We look forward to continuous engagement with the project and being consulted as the proposals develop.

I trust you find these comments useful. Please do not hesitate to contact me if you require further information.

Thank you again for consulting with Highways England and please continue to consult us via our inbox: planningse@highwaysengland.co.uk

Sent on behalf of Heather Archer Assistant Spatial Planning Manager

Andree Gregory
Spatial Planning Administrator
Tel: +44 (0) 300 470 1256
Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ
Web: http://www.highways.gov.uk

Historic England

SOUTH EAST OFFICE

Mr Michael Breslaw
The Planning Inspectorate - Major Applications & Plans
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Direct Dial: 01483 252015

Our ref: PL00468700

24 August 2018

Dear Mr Breslaw

SOUTHAMPTON TO LONDON PIPELINE (NSIP)
SCOPING NOTIFICATION

Thank you for contacting us on 27 July 2018 regarding an EIA scoping opinion in relation to the above development. On the basis of the latest information about the proposals, detailed below, we offer the following advice.

Advice
The proposal is for scoping to inform the proposed replacement of a substantial part of the existing aviation fuel pipeline that runs from Fawley Refinery near Southampton, to the existing Esso West London Terminal in Hounslow.

Development on this route has the potential to impact upon both designated and undesignated heritage assets and their settings. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development of this area might have upon those elements which contribute to the significance of these assets.

General comments
We have reviewed the relevant sections of the documents submitted to support the scheme, and as expected, the scoping report is broken into chapters relating to different environmental elements that may be affected by the proposed development. Chapter 9 considers the Historic Environment and Chapter 10 Landscape and visual impacts, both of which are relevant and contain content relating to designated heritage assets.

Generally we think the scope and detail of the report are robust, and are pleased to see that non-designated heritage assets have been mapped alongside designated assets in fig. 9.1 (sheets 1-13). The assessment matrixes are in line with the magnitude assessments outlined in BS 7913. The relevant national policies and legislation have also been included demonstrating an awareness of the statutory

obligations regarding the historic environment.

Our review of the mapping data for designated heritage assets indicates that all highly graded designated assets (scheduled monuments, Grade I and II* listed buildings, and Registered Parks and Gardens) appear to have been accounted for and included in the baseline data.

Specific comments: aspects requiring attention
There appears to be some discord between chapters 9 and 10 in terms of what has been scoped in to the next stage of assessment. In chapter 9 designated assets have been scoped out, as this chapter identifies no significant impacts, including through impact to designated assets from development within their setting. In chapter 10 however, designated assets are scoped in, identifying the potential impact to their significance from changes within their setting. It will be necessary therefore, to resolve this conflict and clearly identify what elements should be taken forward for further assessment.

There is similar conflict within chapter 9; section 9.5.7 notes the desk based assessment would cover archaeological remains, historic buildings, and historic landscapes (scheduled monuments are not mentioned specifically in this section). If impacts to historic buildings are to be scoped out, it is not clear why they would be included within the DBA, unless as part of a landscape approach to assessment?

It is important that the assessment is designed to ensure that all impacts are fully understood. Techniques such as photomontages and computer generated views analysis imagery are a useful part of this, and would be particularly important in understanding the impact on the setting of designated assets that may be affected. It is important that the setting of any heritage assets is fully understood and also the contribution the setting makes to the significance of these assets. In this respect an analysis of the views to and from the route in relation to designated heritage assets will be important, and this could fall under the remit of both chapter 9 and 10.

Section 9.4.5 refers to impact on designated assets from visual and noise intrusion during construction, and the siting of above ground paraphernalia during operation, as being the two ways in which setting impacts can occur. We refer to our published setting guidance, and note that impacts may come from other changes not considered. For example the longer term of effects of vegetation removal from surrounding landscapes, or loss of associated archaeological deposits or landscape features. Some of these elements may bridge chapters 9 and 10, but will need more detailed consideration.

In the case of scheduled monuments, having an arbitrary 300m buffer zone, to decide if they are scoped in or not, is not adequate. This is because there are a wider range of factors that may be drawn into whether the landscape around a site contributes to

its setting. For example, an asset very close to the development area (less than 300m) but separated physically or topographically, may mean that impacts from development are lessened. Likewise an asset situated further away (over 300m) but in an open landscape, within a landscape close to that originally intended when it was constructed, or containing associated undesignated assets, may result in a greater impact. This principle is discussed in sections 10.4.25-7 of the report. We recommend therefore that scheduled monuments are included in the next stage of analysis rather than scoped out, so that a more nuanced approach can be undertaken to allow assessment of their significance in relation to their surrounding landscape and associated archaeological potential.

Local and regional policies have been assessed as part of the scoping report, but we think that local Conservation Area appraisals could also form part of the baseline data to give a more informed level of assessment, in cases where a Conservation Area is directly affected. We specifically recommend assessment of the Hounslow Urban Context and Character Study, and Basingstoke Canal and Farnborough appraisal.

The assessment should consider the likelihood of alterations to drainage and ground water patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments. It may therefore be relevant to include specific review of these elements within another chapter, for example 8 Water, or 11 Soils and Geology.

We note that the National Planning Policy Framework (NPPF) has recently been updated, so it will be important that any supporting documentation is updated and cross referenced accordingly.

Comments regarding undesignated archaeology
The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning to and on behalf of London boroughs. Advice given follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF section 16 and the London Plan (2011 Policy 7.8) make the conservation of archaeological interest a material planning consideration.

Although it is undoubtedly correct to scope in archaeology for such a large-scale pipeline scheme, having considered the proposals with reference to information held in the Greater London Historic Environment Record and made available in connection with the scoping, we conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest in London. This is because the only land affected in London appears to be the southwest corner of the Esso West London Oil Terminal, an area where the Greater London Historic Environment Record records a

modern household waste landfill site. It is our advice therefore, that further assessment or mitigation would not be considered necessary in relation to undesignated archaeology in London.

Consultation regarding undesignated archaeology for Surrey and Hampshire should however, be undertaken with the local and regional heritage advisors. It is clear from the data presented so far that there is likely to be an impact on undesignated archaeology along the pipeline (and easement) route, so early consultation and consideration of undesignated heritage assets will be a very important aspect of this project. In particular, undesignated heritage assets and archaeology that may relate to designated assets (most significantly, scheduled monuments) would be of interest to us, and could also be subject to review for designation if found to be of national importance. A co-ordinated consultation would be of benefit in these cases, and is supported in the scoping report chapter 9 which refers frequently to consultation with HE and the local authority heritage advisors.

We strongly recommend the involvement of conservation and archaeological staff from the relevant authorities, as they are also well placed to advise on: local historic environment issues and priorities; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Recommendation

We note from chapter 9 that listed buildings and conservation areas, are proposed to be scoped out of the EIA (construction, operation and decommissioning stages) because the effects on their setting would be temporary and minimal (paras. 9.4.12-9.4.22). We largely agree that this is likely to be an acceptable conclusion but with the caveats discussed above, that further baseline information should support that decision, and that there is resolution between the remit of chapters 9 and 10, and also the content of the DBA.

We are in agreement that historic landscapes within the 300m Order Limits should be scoped in (construction phase), and their assessment is likely to bridge the remit of chapters 9 and 10.

Scheduled monuments are currently scoped out in chapter 9 (all stages), though scoped in with regard to landscape setting in chapter 10. We recommend that SM's are scoped in to the EIA (both within and outside the 300m Order Limit; construction phase), to allow for more nuanced and detailed landscape and setting assessment.

We also support the inclusion of archaeology with the 300m Order Limits (construction phase), and will be particularly interested in areas where undesignated archaeological remains may relate to designated heritage assets.

We urge you to address the above issues, and recommend that production of an Environmental Statement should continue in accordance with national and local policy guidance. If you have any queries about any of the above, or would like to discuss anything further, please contact our SE Planning Team for further advice.

Yours sincerely,

[redacted]

Rebecca Lambert
Inspector of Ancient Monuments
rebecca.lambert@HistoricEngland.org.uk

CEMHD Policy - Land Use Planning
NSIP Consultations
Building 2.2, Redgrave Court
Merton Road, Bootle
Merseyside, L20 7HS

Your ref: EN070005
Our ref: 4.2.1.6475
HSE email: NSIP.applications@hse.gov.uk

Southampton to London Pipeline team
The Planning Inspectorate
Bristol
BS1 6PN
By e-mail

22/08/2018

Dear Southampton to London Pipeline team

PROPOSED Southampton to London Pipeline - EIA scoping consultation (the project)
PROPOSAL BY Esso Petroleum Company (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) – Regulations 10 and 11

Thank you for your letter of 27th July 2018 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records there are five major accident hazard sites and four major accident hazard pipelines within the proposed location scheme of the pipeline for this nationally significant infrastructure project:

Major accident hazard sites:

1) HSE ref H4652; operated by IGas Energy PLC incorporating Star Energy Ltd
2) HSE ref H0417; operated by SCJ Eurafne Ltd
3) HSE ref H1591; Chertsy Holder Station
4) HSE ref H0893; operated by Esso Petroleum Company Ltd, West London Terminal (acknowledging that this is operated by the proposer)
5) HSE ref H1189; operated by Foster Yeoman

Major accident hazard pipelines:

1) HSE ref 7066; Froyle / Greatham Orifice Carrier P019
2) HSE ref 2283; Miltons Farm to Horsell Common
3) HSE ref 2273; Staines bypass to Laleham
4) HSE ref 2312 Lordswood /Purbrook (P006)

HSE's Land Use Planning advice would be dependent on the location of areas where the public may be present and so it is possible that HSE may advise against this proposal. When we are consulted by the Applicant with further information, under Section 42 of the Planning Act 2008, we can update our advice.

Hazardous Substance Consent

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended.

Hazardous Substances Consent would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 An Annex on the Planning Inspectorate's website - Annex G – The Health and Safety Executive . This document includes consideration of risk assessments on page 3.

Explosives sites

HSE has no comment to make as there are no licensed explosive sites in the vicinity.

Pipelines

As the report indicates the pipeline does not constitute a MAHP as defined by the Pipelines Safety Regulations 1996 (PSR), Esso are not required to inform HSE of the intention to construct, commission and operate this pipeline. However, Esso would be expected to recognise the general requirements of PSR and design, construct, test, commission and operate the pipeline to current relevant standards.

Electrical Safety

No comment from a planning perspective.

Please send any further electronic communication on this project directly to the HSE's designated e-mail account for NSIP applications. Alternatively, any hard copy correspondence should be sent to:

Mr Dave Adams (MHPD)
NSIP Consultations
2.2 Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS

Yours sincerely,

[redacted]

Marion Davies

PP
Dave Adams
(CEMHD4 Policy)

Ms Marie Shoesmith
Senior EIA and Land Rights Advisor
on behalf of the Secretary of State
Major Casework Directorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

BY EMAIL ONLY

Environment, Planning and Enforcement
Invicta House
County Hall
Maidstone
ME14 1XX

Phone: 03000 415673
Ask for: Francesca Potter
Email:
Francesca.potter@kent.gov.uk

7 August 2018

Dear Marie,

Re: Application by Esso Petroleum Company, Limited (the Applicant) for an Order granting Development Consent for the Southampton to London Pipeline Project (the Proposed Development) - Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for inviting Kent County Council (KCC) to comment on the Scoping Opinion for the Southampton to London Pipeline project.

KCC confirms it does not have any comments to raise on this Scoping Opinion.

If you require any further information or clarification on any matter, please do not hesitate to contact me.

Yours sincerely,

[redacted]

Katie Stewart
Director - Environment, Planning and Enforcement

CROYDONCROYDON
www.croydon.gov.ukwww.croydon.gov.uk

Development Management
Place Department
6th Floor, Bernard Weatherill House
8 Mint Walk
Croydon CR0 1EA

Please ask for/reply to: Tim Edwards
Tel/Typetalk: 020 8726 6800 Extn 60596
Minicom: 020 8760 5797
Email: development.management@croydon.gov.uk

Your ref:
Our ref: P/PC/South Area Team/DCTE

Date: 9th August 2018

Michael Breslaw
The Planning Inspectorate
Major Applications & Plans
Major Casework Directorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017

Application Number: 18/03741/ENVS
Location: Southampton To London Pipeline, , , ,
Description: Proposed Southampton to London Pipeline

I am writing to you with regards to your letter and submission dated 27.07.2018

Taking into account the details and type of development described the Council formally considered whether to comment on the proposal .

I can confirm that at its Delegated Business Meeting on the 9th August 2018 it was decided that the council wish to make no comment on the proposal

Further applicant notes :-

1 Having reviewed the proposal, it is noted that it is not located adjacent to or in particularly close proximity to LBC's boundary. It is therefore well separated from properties in LBC and is considered not to result in any significant harm to the amenity of residential properties in the borough or cause harm to the borough as a whole.

It is therefore considered that there is no need for LBC to comment or respond to this consultation.

Yours faithfully,

Pete Smith
Head of Development Management

Ministry of Defence

Defence Infrastructure Organisation

Marie Shoesmith
The Planning Inspectorate
Major Casework Directorate
2 The Square
Bristol
BS1 6PN

Safeguarding Department
Statutory & Offshore

Defence Infrastructure Organisation
Kingston Road
Sutton Coldfield
West Midlands
B75 7RL

Tel: +44 (0)121 311 3790 **Tel (MOD):** 94421 3790
Fax: +44 (0)121 311 2218
E-mail: DIO-safeguarding-statutory@mod.GOV.uk

www.mod.uk/DIO

Your Reference: EN070005_000008_270718
Our reference: 10043967

22 August 2018

Dear Marie,

MOD Safeguarding

Proposal: Application by Esso Petroleum Company, Limited (the Applicant) for an Order granting Development Consent for the Southampton to London Pipeline Project (the Proposed Development)

Thank you for consulting the Ministry of Defence (MOD) on the above Scoping Opinion application which was received by this office on 27/07/18.

The application is seeking an opinion on what information will need to be considered in any Environmental Statement.

The new pipeline will start in Borley Green just outside Southampton and end at the West London Terminal Storage Facility. Some of the pipeline route passes through the MOD's estate. The applicant is engaged with the MOD on this proposal and we are content with their approach for installing the pipeline across the MOD's estate. However, the applicant should note that any works or access onto MOD land will be subject to obtaining permission and must comply with site management requirements including safety and operational requirements.

The proposed pipeline route also passes through the RAF Odiham and RAF Northolt statutory safeguarding zones. We have no concerns with the pipeline passing through these zones however we may have concerns if any tall construction equipment such as cranes is used to lift the pipes into place. Cranes can affect the performance of radars and also air traffic safety. Between Lower Farringdon and Farnborough the route passes through the RAF Odiham aerodrome height safeguarding zone and the area around Crondall also passes through a technical safeguarding zone. Any tall pieces of construction equipment used within this stretch of the pipeline would need to be assessed by the MOD.

The MOD has no safeguarding concerns with this proposal but the applicant should consider the use of tall construction equipment within the aerodrome safeguarding zones when progressing this scheme.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

Laura Nokes
Safeguarding Officer

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Sent electronically to:

SouthamptontoLondonPipeline@pins.gsi.gov.uk

Land and Acquisitions
Anne Holdsworth
DCO Liaison Officer
Network Management
anne.holdsworth@nationalgrid.com
Direct tel: +44 (0)7960175682

www.nationalgrid.com

15th August 2018

Dear Sir / Madam

Ref: Southampton to London Pipeline Project - EIA Scoping Notification and Consultation

I refer to your email dated 27th July 2018 in relation to the above proposed application for a Development Consent Order for the proposed Southampton to London Pipeline Project. Having reviewed the Scoping Report, I would like to make the following comments:

National Grid infrastructure within / in close proximity to the order boundary

Electricity Transmission

National Grid Electricity Transmission has high voltage electricity overhead transmission lines, substations and underground cables within or in close proximity to the proposed order limits. The overhead lines, substations and underground cables form an essential part of the electricity transmission network in England and Wales. The details of the electricity assets are shown below:

Overhead Lines

- 4YC (400kV) overhead line route
- VB 400kV) overhead line route
- ZH (275kV) overhead line route
- ZC (275kV) overhead line route
- VW (275kV) overhead line route

Substations

- Laleham 1 132kV Substation
- Laleham 2 275kV Substation

Underground cables

There are underground fibre cables within or in close proximity to the proposed order limits.

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

I enclose plans showing the routes of National Grid's electricity apparatus.

Should you require any advice on cathodic protection please contact our engineering services.

Gas Transmission Infrastructure:

National Grid Gas has no high pressure gas transmission pipeline located within or in close proximity to the proposed order limits.

Electricity Infrastructure:

- National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 3 (2004).
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above

- National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.

- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

To view the SSW22 Document, please use the link below:
http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW/safeworking.htm

To download a copy of the HSE Guidance HS(G)47, please use the following link:
http://www.hse.gov.uk/pubns/books/hsg47.htm

We would request that the potential impact of the proposed scheme on National Grid's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, National Grid is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by National Grid. Further information relating to this can be obtained by contacting the email address below.

Where the promoter intends to acquire land, extinguish rights, or interfere with any of National Grid apparatus protective provisions will be required in a form acceptable to it to be included within the DCO.

National Grid requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address:**box.landandacquisitions@nationalgrid.com**

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity or gas customer services.

Yours Faithfully

[redacted]

Anne Holdsworth

nationalgrid | Southampton to London 1

Legend:

- Substations Commissioned
- Circuits
  - Commissioned
  - Decommissioned Group
  - Planned and Spares
- OHL 400Kv Commissioned
- OHL 275Kv Commissioned
- OHL 132Kv & Below Commissioned
- Towers Commissioned
- Buried Cable Commissioned
- Fibre Cable Commissioned
- Pilot Cable
- Oil Pipe
- Cooling Pipe
- Cooling Station
- RAMM
- Gas Operational Boundary
- Gas Site Boundary
- Block Valve
- Compressor
- LNG Site
- Multijunction
- Minimum Offtake
- Future Minimum Offtake
- Offtake
- Pressure Reduction Installation
- Pig Trap
- Terminal
- Transferred Offtake
- Aerial Marker Post
- CP Test Post
- Transformer Rectifier
- Gas Pipe Feeder
  - Commissioned
  - Decommissioned Group
  - Planned and Spares
- CP Protected Section Range
- Pipe Line Control Point

Notes:

Esso Pipeline

0 0.51 1.0 Kilometers

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Date: 10/08/2018
Time: 13:47:23

Page size: A3 Landscape Scale: 1: 20,000
Print by: **Holdsworth, Anne**

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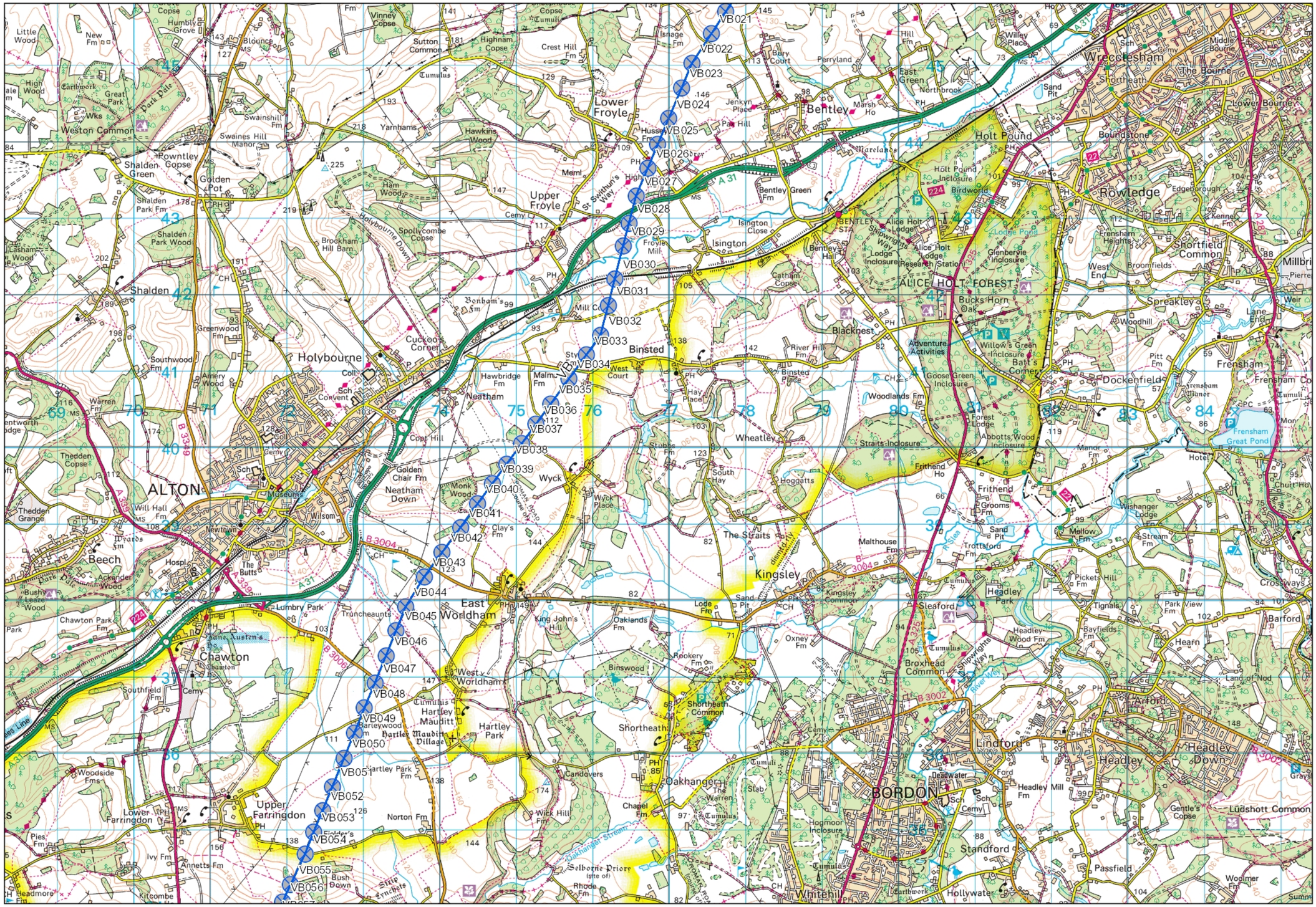

nationalgrid | Southampton to London 2

Legend:

- ■ Substations Commissioned
- — OHL 400Kv Commissioned
- — OHL 275Kv Commissioned
- — OHL 132Kv & Below Commissioned
- ⊗ Towers Commissioned
- — Buried Cable Commissioned
- — Fibre Cable Commissioned
- — Pilot Cable
- □ Gas Operational Boundary
- □ Gas Site Boundary
- ● Block Valve
- ◎ Compressor
- ■ LNG Site
- ● Multijunction
- ■ Minimum Offtake
- ■ Future Minimum Offtake
- ● Offtake
- ▲ Pressure Reduction Installation
- ▲ Pig Trap
- ▲ Terminal
- ● Transferred Offtake
- Aerial Marker Post
- ▲ CP Test Post
- Ⓣ Transformer Rectifier
- Gas Pipe Feeder
  - — Commissioned
  - – · Decommissioned Group
  - – Planned and Spares
- ● Pipe Line Control Point

Notes:

Esso Pipeline

0 1.27 2.5 Kilometers

Date: 10/08/2018
Time: 13:50:18

Page size: A3 Landscape Scale: 1: 50,000
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nationalgrid | Southampton to London 3

Legend:

- Substations Commissioned
- Circuits
  - Commissioned
  - Decommissioned Group
  - Planned and Spares
- OHL 400Kv Commissioned
- OHL 275Kv Commissioned
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- CP Test Post
- Transformer Rectifier
- Gas Pipe Feeder
  - Commissioned
  - Decommissioned Group
  - Planned and Spares
- CP Protected Section Range
- Pipe Line Control Point

Notes:

Esso Pipeline

0 0.38 0.8 Kilometers

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Date: 10/08/2018
Time: 13:52:16

Page size: A3 Landscape Scale: 1: 15,000
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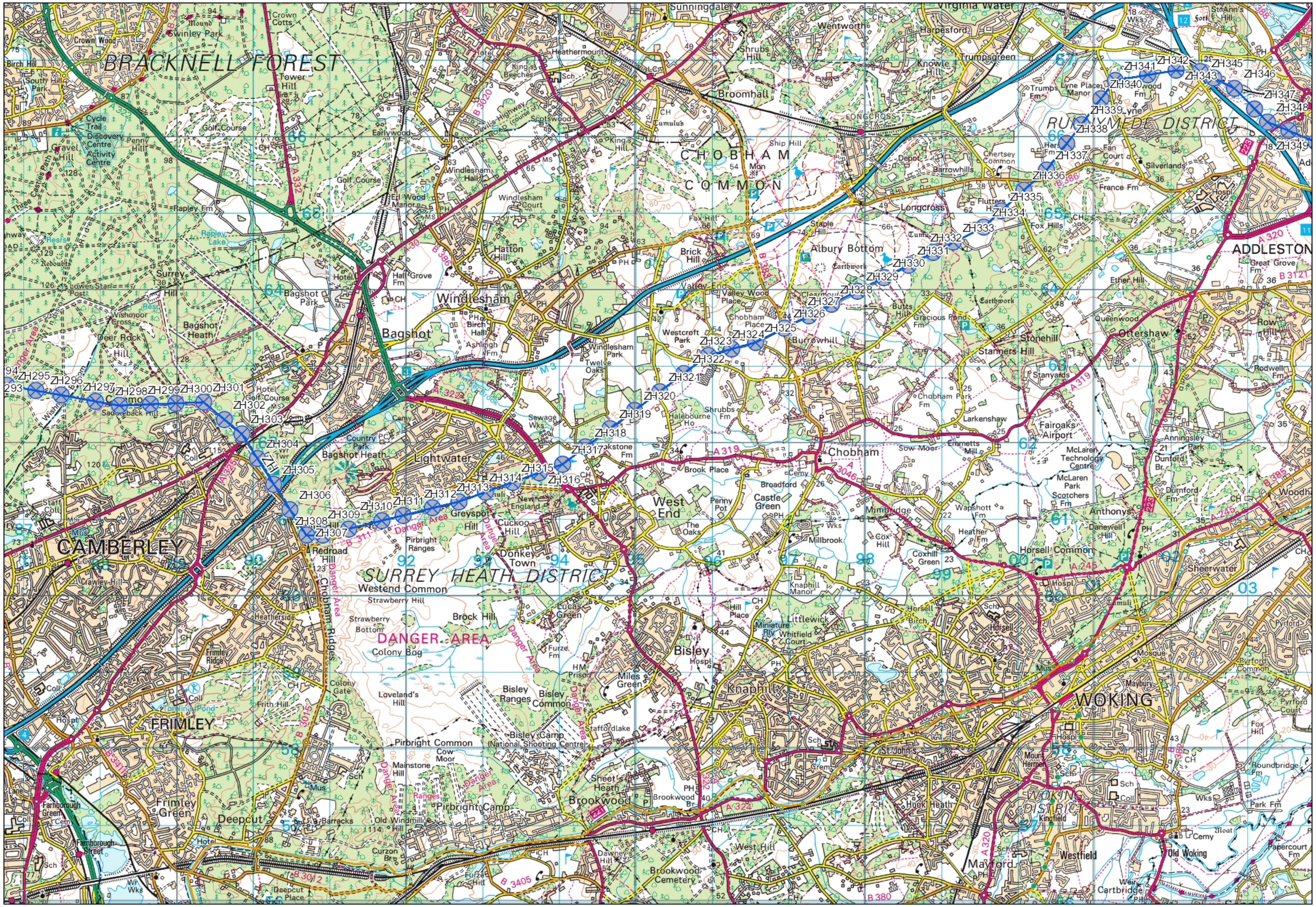

Legend:

- Substations Commissioned
- OHL 400Kv Commissioned
- OHL 275Kv Commissioned
- OHL 132Kv & Below Commissioned
- Towers Commissioned
- Buried Cable Commissioned
- Fibre Cable Commissioned
- Pilot Cable
- Gas Operational Boundary
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- CP Test Post
- Transformer Rectifier
- Gas Pipe Feeder
  - Commissioned
  - Decommissioned Group
  - Planned and Spares
- Pipe Line Control Point

Notes:

Esso pipeline

0 | 1.27 | 2.5 Kilometers

Date: 10/08/2018
Time: 13:53:55

Page size: A3 Landscape Scale: 1: 50,000
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nationalgrid | Southampton to London 5

Legend:

- Substations Commissioned
- Circuits
  - Commissioned
  - Decommissioned Group
  - Planned and Spares
- OHL 400Kv Commissioned
- OHL 275Kv Commissioned
- OHL 132Kv & Below Commissioned
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  - Commissioned
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- CP Protected Section Range
- Pipe Line Control Point

Notes:

Esso pipeline

0 0.51 1.0 Kilometers

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nationalgrid | Southampton to London 6

Legend:

- Substations Commissioned
- Circuits
  - Commissioned
  - Decommissioned Group
  - Planned and Spares
- OHL 400Kv Commissioned
- OHL 275Kv Commissioned
- OHL 132Kv & Below Commissioned
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Notes:

Esso pipeline

0 0.51 1.0 Kilometers

Date: 10/08/2018
Time: 13:57:34

Page size: A3 Landscape Scale: 1: 20,000
Print by: **Holdsworth, Anne**

Planning
Service Manager: David Groom

Mr Breslaw

Our Ref: ENQ/18/20810
Your Ref: EN070005_000008_270718

20 August 2018

Dear Mr Breslaw

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11

Application by Esso Petroleum Company, Limited (the Applicant) for an Order granting Development Consent for the Southampton to London Pipeline Project (the Proposed Development)

I refer to the scoping consultation and notification concerning the above development under Regulations 10 (11) and 11(3) of the EIA Regulations 2017.

I write to confirm that New Forest District Council have no comments to make on the information to be provided in an Environmental Statement (ES) relating to the Proposed Development.

Yours sincerely

Judith Garrity
Development Control Team Leader

Tel: 023 8028 5588
Email:dev.control@nfdc.gov.uk

Please read our Privacy Notice by following this link:
http://www.newforest.gov.uk/article/18330/Planning-privacy-notice-GDPR

Registered Office:
Portsmouth Water Ltd
PO Box 8
Havant
Hampshire PO9 1LG

Tel: 023 9249 9888
Fax: 023 9245 3632
Web: www.portsmouthwater.co.uk

CONSULTATION UNDER THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE ENGLAND) ORDER 2010

Applicant:	Application by Esso Petroleum Company, Limited (the Applicant) for an Order granting Development Consent for the Southampton to London Pipeline Project (the Proposed Development)
Planning Application Reference:	EN070005_000008_270718
Proposal:	Scoping Report Consultation
Date:	20 August 2018

Portsmouth Water have identified this application as one that is of interest to us and therefore respectfully ask to be pro-actively consulted on this application again in future. This is to ensure that adequate provision of water industry infrastructure and potential risks to groundwater have been assessed and protection of our sources and assets are considered in the decision process.

We have reviewed the following documentation and have the following comments:

- Southampton to London Pipeline Project Scoping Report Volume 1, PINS Reference Number EN070005, July 2018;
- Southampton to London Pipeline Project Scoping Report Volume 2: Chapter 8 to 9 Figures, PINS Reference Number EN070005, July 2018;
- Southampton to London Pipeline Project Scoping Report Volume 2: Chapter 11 Figures, PINS Reference Number EN070005, July 2018;

General Comments

The presence of solution features in the Portsmouth Water catchment can result in rapid travel times to our sources. Turbidity and pollutants have the potential to reach our sources in hours without appropriate mitigation measures in place. The scoping decisions presented in *Table 8.15 Matters of significance for the water environment,* must take into account the likelihood and/or presence of solution feautres.

Portsmouth Water also wish to see solution features considered in the risk criteria presented in *Table 8.13 Criteria for Sensitivity/Value of Receptors.*

Whilst we agree with much of the methodology and approach used in the Scoping Report we have concerns that solution features and karstic landscapes are yet to be considered. Without the inclusion of baseline/basic data on karstic features Portsmouth Water do not consider it possible to establish the baseline and/or accurately understand the potential risks posed by this proposal to groundwater/Controlled Waters.

Specific Comments

The following specific comments have been provided for consideration and are presented using the same nomenclature as in the report for ease of reference:

Page	***Section***	***Comment / Recommendations***
Chapter 8.0 - Water		
4-28	4.7.3 - Table 4.6 Project-wide embedded mitigation assumed for Scoping	The pipeline as laid will not lie within existing source protection zone 1 (SPZ 1) and or areas of known karstic/solution features.
8-6	Data Collection – Groundwater	Data on solution features has not been included in the preparation of this report and therefore some of the risk classifications and assessments are not considered appropriate at this stage.
8-10	Groundwater Baseline – Groundwater Study Area A - 8.3.20	Please note the Lambeth Group is designated as a Secondary A Aquifer as outlined in Table 8.1 and should be included in the text.
8-14	Groundwater Study Area B - 8.3.28	*"The extent of karst features in the Chalk near the Order Limits is still to be determined. However, BGS (1997) notes that in the River Alre catchment (in the vicinity of Section B), karstic flow has developed, resulting in very high yielding boreholes for the Chalk."* This is true of much of Portsmouth Water's catchment.
8-14	Groundwater Study Area B - 8.3.33	*"Clay with flint superficial deposits which are present within GWSA-B are defined as unproductive strata and have negligible value as a groundwater receptor."* There can be an association with the low permeability clay with flints and their boundaries with solution features, therefore further investigation would be required.
8-38	Groundwater - Construction 8.4.4	*"Interception of shallow groundwater in the pipeline trench which could lead to groundwater of poor quality discharging to sensitive receptors."* These sensitive receptors should include the underlying Principal Chalk Aquifer where present at the feather edge of Lambeth Group (GWSA-A/B). The boundary of GWSA-A/B should be considered for assessment due to potential interconnectivity between the Secondary A Lambeth Group and underlying Principal Chalk Aquifer.
8-41	Groundwater - Construction 8.4.4	*"Changes to groundwater quality from leaks and spills from chemicals, fuels and oils from construction plant or*

Page	*Section*	*Comment / Recommendations*
		materials used in the construction of the pipeline, including materials containing cement." We would wish to see this scoped in for areas on Principal Aquifer and within Source Protection Zones (SPZs)
8-50	Medium Sensitivity Value - Table 8.13 Criteria for Sensitivity/Value of Receptors	We would wish to see all areas of suspected/demonstrated karstic feautres designated as high sensitivity.
8-58	Table 8.15 Matters of significance for the water environment – Interception of shallow groundwater	We would wish to see all areas where shallow groundwater is contributing to groundwater in Principal Aquifers.
	Interception of shallow groundwater in the pipeline trench which could lead to groundwater of poor quality discharging to sensitive receptors	Please scope in GWSA-A and B where connectivity may occur between the Lambeth Group and Chalk Aquifer and where solution features exist.
8-58/59	Changes to groundwater quality from migration of suspended solids	Please scope in the boundary of Area GWSA-A/B where the Chalk is semi-confined and excavations/deep works may cause turbidity.
8-59	Changes to groundwater quality from leaks and spills from chemicals, fuels and oils used in construction	Scope in areas that fall within a SPZ.
8-60	Leaks of aviation fuel	Please scope in the boundary of Area GWSA-A/B where the Chalk is semi-confined.
Chapter 11 – Soils and Geology		
11-13	11.3.28 - Solution Features	If solution features are indicated close to the proposed work areas, they must be investigated to understand their source and formation. Solution features can provide rapid pathways potentially impacting Portsmouth Water's resources and therefore, if present, they must be understood so suitable designs can be proposed to mitigate the risks.
11-13	Table 11.7 Unstable Ground	Unstable ground including natural cavities must be considered with respect to environmental impacts as previously stated, solution feautres can form rapid pathways presenting significant risks to Portsmouth Water's resources.
11-21	Table 11.11 - Historic potentially contaminative land uses - Industrial estates….	Portsmouth Water do not agree with the 'Low' classification for industrial estates. Due to the sensitivity of Controlled Waters within the catchment and unknown processes, drainage routes, underground tanks etc… Industrial Estates should be reclassified as Moderate to High.
11-23	Impacts to Controlled Waters	Migration of impacted material/leachate along the new pipeline exterior should be considered as a pathway.
11-32	Table 11.14 – Matters of significance for geology and soils	Unstable ground must be considered in terms of environmental risks and potential pathways for contamination including turbidity.

Catchment Management Team
Portsmouth Water
catchment.management@portsmouthwater.co.uk

Public Health England

CRCE/NSIP Consultations
Chilton
Didcot
Oxfordshire OX11 0RQ

T +44 (0) 1235 825278
F +44 (0) 1235 822614

www.gov.uk/phe

Ms Marie Shoesmith
Senior EIA and Land Rights Advisor
The Planning Inspectorate
Eagle Wing
Temple Quay House
Bristol BS1 6PN

Your Ref : NA
Our Ref : 46380

22nd August 2018

Dear Ms Shoesmith

Re: Scoping Consultation
Application for an Order Granting Development Consent for the proposed Southampton to London Pipeline Project

Thank you for including Public Health England (PHE) in the scoping consultation phase of the above application. Our response focuses on health protection issues relating to chemicals and radiation. Advice offered by PHE is impartial and independent.

We note that a number of potential impacts to public health have been scoped out at this stage. These include changes in air quality from construction, machinery and traffic, releases to groundwater and issues associated with previous land use and new land contamination. We accept that it is standard practice to scope out assessments where it can be demonstrated that the risk is negligible. PHE recommends that, where the applicant proposes to use this approach the Preliminary Environmental Impact Report (PIER) should provide a sufficient documentation to provide a full, evidence based justification. The PIER should include a summary of any monitoring data, assumptions made or other supporting information used to justify the scoping out of any further assessment and clearly identify any remaining uncertainties or unknowns.

Please refer to the attached appendix which outlines generic areas that should be addressed by all promoters when preparing ES for inclusion with an NSIP submission.

We understand that the promoter will wish to avoid unnecessary duplication and that many issues will be covered elsewhere in the ES. However, we believe that the summation of these into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the

requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. Any assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal, therefore we accept that, in some circumstances particular assessments may not be relevant to an application, or that an assessment may be adequately completed using a qualitative rather than quantitative methodology. In cases where this decision is made, the promoters should fully explain and justify their rationale in the submitted documentation.

We are happy to assist and discuss proposals further in the light of this advice.

Yours sincerely

Environmental Hazards & Emergencies Dept
On behalf of Public Health England
Nsipconsultations@phe.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Appendix: PHE recommendations regarding the scoping document

General approach

The EIA should give consideration to best practice guidance such as the Government's Good Practice Guide for EIA[1]. It is important that the EIA identifies and assesses the potential public health impacts of the activities at, and emissions from, the installation. Assessment should consider the development, operational, and decommissioning phases.

It is not PHE's role to undertake these assessments on behalf of promoters as this would conflict with PHE's role as an impartial and independent body.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, EIA should start at the stage of site and process selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES[2].

The following text covers a range of issues that PHE would expect to be addressed by the promoter. However this list is not exhaustive and the onus is on the promoter to ensure that the relevant public health issues are identified and addressed. PHE's advice and recommendations carry no statutory weight and constitute non-binding guidance.

Receptors

The ES should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land. Consideration should also be given to environmental receptors such as the surrounding land, watercourses, surface and groundwater, and drinking water supplies such as wells, boreholes and water abstraction points.

Impacts arising from construction and decommissioning

Any assessment of impacts arising from emissions due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.

We would expect the promoter to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place

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[1] Environmental Impact Assessment: A guide to good practice and procedures - A consultation paper; 2006; Department for Communities and Local Government. Available from: http://webarchive.nationalarchives.gov.uk/20100410180038/http:/communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/

[2] DCLG guidance, 1999 http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf

to mitigate any potential impact on health from emissions (point source, fugitive and traffic-related). An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The promoter should ensure that there are robust mechanisms in place to respond to any complaints of traffic-related pollution, during construction, operation, and decommissioning of the facility.

Emissions to air and water

Significant impacts are unlikely to arise from installations which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, PHE has a number of comments regarding emissions in order that the EIA provides a comprehensive assessment of potential impacts.

When considering a baseline (of existing environmental quality) and in the assessment and future monitoring of impacts these:

- should include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary
- should encompass all pollutants which may be emitted by the installation in combination with all pollutants arising from associated development and transport, ideally these should be considered in a single holistic assessment
- should consider the construction, operational, and decommissioning phases
- should consider the typical operational emissions and emissions from start-up, shut-down, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts
- should fully account for fugitive emissions
- should include appropriate estimates of background levels
- should identify cumulative and incremental impacts (i.e. assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (i.e. rail, sea, and air)
- should include consideration of local authority, Environment Agency, Defra national network, and any other local site-specific sources of monitoring data
- should compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as UK Air Quality Standards and Objectives and Environmental Assessment Levels)
    - If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (a Tolerable Daily Intake or equivalent). Further guidance is provided in Annex 1
    - This should consider all applicable routes of exposure e.g. include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion
- should identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development

Whilst screening of impacts using qualitative methodologies is common practice (e.g. for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken. PHE's view is that the EIA should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the installation, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed installation on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure.

Additional points specific to emissions to air
When considering a baseline (of existing air quality) and in the assessment and future monitoring of impacts these:

- should include consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs)
- should include modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst case conditions)
- should include modelling taking into account local topography

Additional points specific to emissions to water
When considering a baseline (of existing water quality) and in the assessment and future monitoring of impacts these:

- should include assessment of potential impacts on human health and not focus solely on ecological impacts
- should identify and consider all routes by which emissions may lead to population exposure (e.g. surface watercourses; recreational waters; sewers; geological routes etc.)
- should assess the potential off-site effects of emissions to groundwater (e.g. on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure
- should include consideration of potential impacts on recreational users (e.g. from fishing, canoeing etc) alongside assessment of potential exposure via drinking water

Land quality
We would expect the promoter to provide details of any hazardous contamination present on site (including ground gas) as part of the site condition report. Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the migration of material off-site should be assessed[3] and the potential impact on nearby receptors and control and mitigation measures should be outlined.

[3] Following the approach outlined in the section above dealing with emissions to air and water i.e. comparing predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as Soil Guideline Values)

Relevant areas outlined in the Government's Good Practice Guide for EIA include:

- effects associated with ground contamination that may already exist
- effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination
- impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc.

Waste

The EIA should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).

For wastes arising from the installation the EIA should consider:

- the implications and wider environmental and public health impacts of different waste disposal options
- disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated

Other aspects

Within the EIA PHE would expect to see information about how the promoter would respond to accidents with potential off-site emissions e.g. flooding or fires, spills, leaks or releases off-site. Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.

The EIA should include consideration of the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations 2009: both in terms of their applicability to the installation itself, and the installation's potential to impact on, or be impacted by, any nearby installations themselves subject to the these Regulations.

There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report[4], jointly published by Liverpool John Moores University and the HPA, examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: "Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be negligible." PHE supports the inclusion of this information within EIAs as good practice.

[4] Available from: http://www.cph.org.uk/wp-content/uploads/2012/08/health-risk-perception-and-environmental-problems--summary-report.pdf

Annex 1

Human health risk assessment (chemical pollutants)

The points below are cross-cutting and should be considered when undertaking a human health risk assessment:

- The promoter should consider including Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- Where available, the most recent United Kingdom standards for the appropriate media (e.g. air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants. Where UK standards or guideline values are not available, those recommended by the European Union or World Health Organization can be used
- When assessing the human health risk of a chemical emitted from a facility or operation, the background exposure to the chemical from other sources should be taken into account
- When quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the 'Margin of Exposure' (MOE) approach[5] is used

[5] Benford D et al. 2010. Application of the margin of exposure approach to substances in food that are genotoxic and carcinogenic. Food Chem Toxicol 48 Suppl 1: S2-24

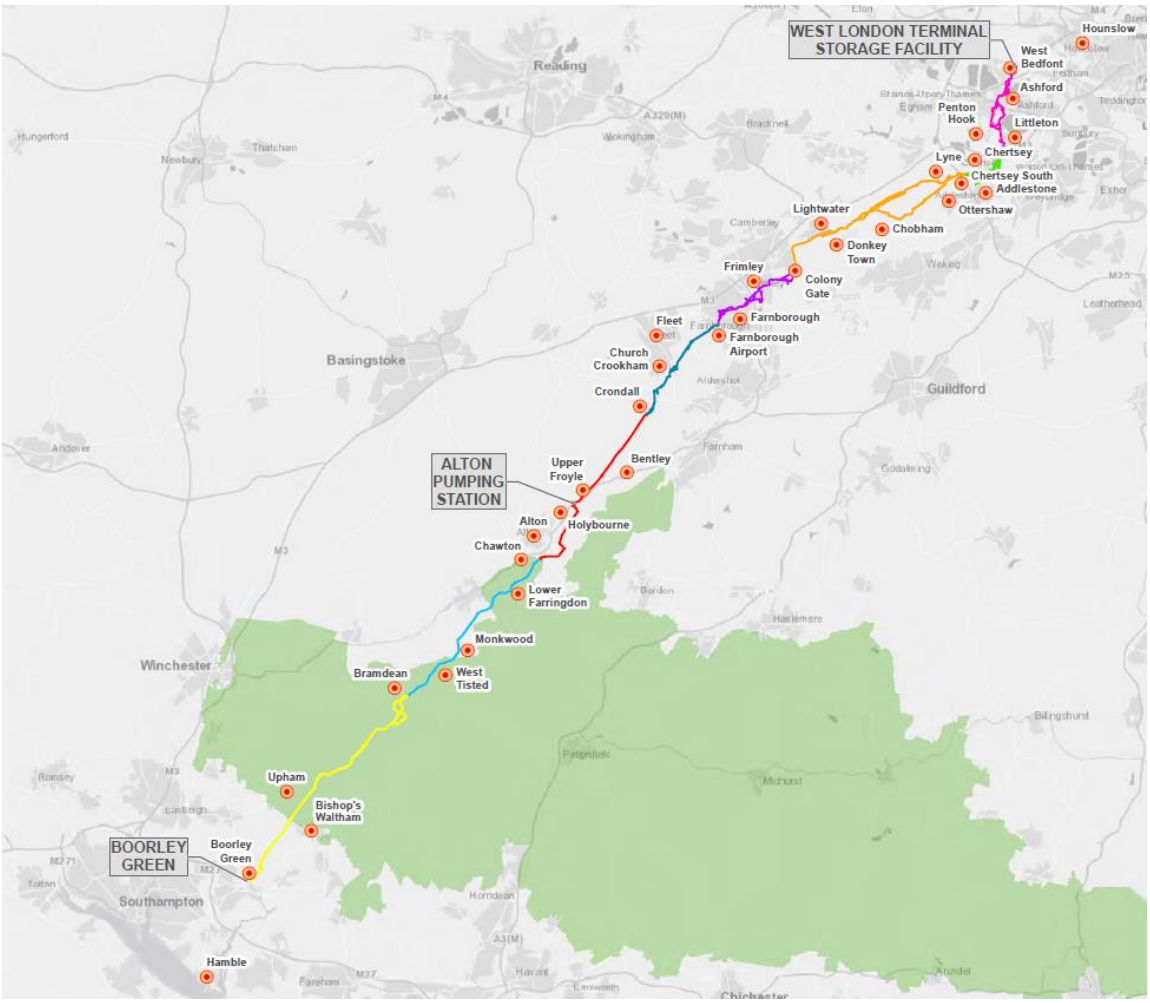
Southampton to London Pipeline – proposed development by Esso Petroleum Ltd

Royal Mail Group Limited comments on information to be provided in applicant's Environmental Statement

Introduction

Reference the letter from PINS to Royal Mail dated 27 July 2018 requesting Royal Mail's comments on the information that should be provided in Esso Petroleum Ltd's Environmental Statement.

Royal Mail's consultants BNP Paribas Real Estate have reviewed the applicant's Regulation 8 (1) Scoping Report dated July 2018 and scrutinised the preferred corridor route as shown below.



Royal Mail– relevant information

Under section 35 of the Postal Services Act 2011 (the "Act"), Royal Mail has been designated by Ofcom (the independent communications regulator) as a provider of the Universal Postal Service.

Royal Mail is the only such provider in the United Kingdom. Its services are regulated by the Communications Industry Regulator, Ofcom.

In respect of its postal services functions, section 29 of the Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

By sections 30 and 31 of the Act (read with sections 32 and 33) there is a set of minimum standards for Universal Service Providers, which Ofcom must secure. The conditions imposed by Ofcom reflect those standards. There is, in effect, a statutory obligation on Royal Mail to provide at least one collection from letterboxes and post offices six days a week and one delivery of letters to all 29 million homes and businesses in the UK six days a week (five days a week for parcels). Royal Mail must also provide a range of "end to end" services meeting users' needs, e.g. First Class, Second Class, Special Delivery by 1 pm, International and Redirections services.

Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Its performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project.

Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

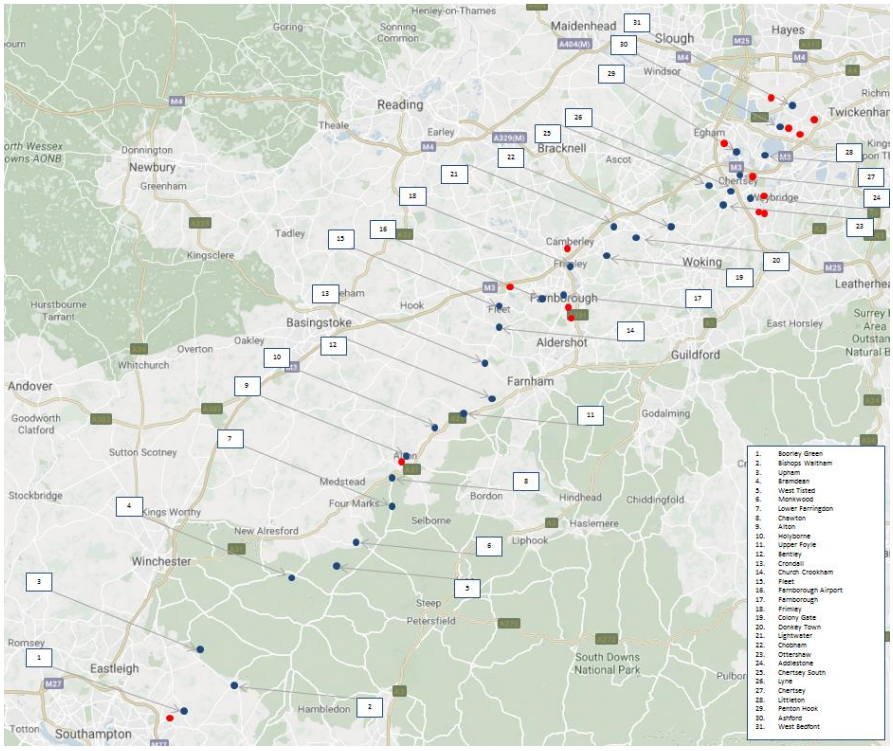
Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

Potential impacts of the scheme on Royal Mail

Royal Mail has identified a minimum of fifteen operational properties within approximately 5 miles the preferred corridor route as identified on the schedule and plan below.

LONDON AIR MAIL UNIT HUB	585 Short Road Hounslow TW6 3PR	2.2 Miles from (31)
FELTHAM DELIVERY OFFICE	2 Plane Tree Crescent Feltham TW13 7HH	2.5 Miles from (31) & (30)
ASHFORD DELIVERY OFFICE	Feltham Hill Road Ashford TW15 1YA	0.8 Miles from (30)
SUNBURY ON THAMES DELIVERY OFFICE	45-49 Staines Road W Sunbury on Thames TW16 7AA	2.2 Miles from (30)
STAINES DELIVERY OFFICE	Thorpe Ind Est Crabtree Road Egham, TW20 8RS	1.6 Miles from (29)
SHEPPERTON DELIVERY OFFICE	47 High Street Shepperton TW17 9AA	1.5 Miles from (28)

CHERTSEY DELIVERY OFFICE	74 Guildford Street Chertsey KT16 9AA	0.3 Miles from (27)
ADDLESTONE DELIVERY OFFICE	76 Station Road Addlestone KT15 2AA	0.2 Miles from (24)
WEYBRIDGE DELIVERY OFFICE	1 Elmgrove Road Weybridge KT13 8AA	1.5 Miles from (24)
WEST BYFLEET DELIVERY OFFICE	Circuit Centre Avro Way Weybridge KT13 0XG	1.5 Miles from (24)
CAMBERLEY DELIVERY OFFICE	1 Doman Road Camberley GU15 3HA	1.9 Miles from (18)
FARNBOROUGH DELIVERY OFFICE	108 Alexandra Road Farnborough GU14 6DG	1.1 Miles from (17)
FLEET DELIVERY OFFICE	17 Waterfront Business Park Fleet GU51 3BQ	2.4 Miles from (15)
ALTON DELIVERY OFFICE	73 High Street Alton GU34 1AA	2.1 Miles from (9)
HEDGE END DELIVERY OFFICE	Unit 2 Nelson Ind Park Southampton SO30 2JH	2.3 Miles from 1 (1)



In addition, it is likely that there with be post boxes within or adjacent to the preferred route corridor, the locations of which will need to be identified during the land referencing stage.

The location, nature and scale of the proposed Southampton to London Pipeline may present risk of construction phase impact / delays to Royal Mail's road based operations on the surrounding road network.

Every day, in exercising its statutory duties Royal Mail vehicles use all of the main roads that may potentially be affected by additional traffic arising from the construction of the Southampton to London Pipeline.

Royal Mail therefore wishes to ensure the protection of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations which may be adversely affected by the construction and operation of this proposed scheme.

Royal Mail's comments on information that should be provided in Esso Petroleum Ltd's Environmental Statement

Royal Mail has the following comments / requests:

1. Royal Mail requests that the ES includes information on the needs of major road users (such as Royal Mail) and acknowledges the requirement to ensure that major road users are not disrupted though full consultation at the appropriate time in the DCO and development process.

2. The ES should include detailed information on the construction traffic mitigation measures that are proposed to be implemented, including a draft Construction Traffic Management Plan (CTMP).

3. Royal Mail requests that careful attention is given to the potential for cumulative traffic impact during the construction phase. The Scoping Report should address the potential cumulative traffic effects arising from the construction of the Southampton to London Pipeline together with all other proposed major developments in the area.

4. Royal Mail requests that it is fully pre-consulted by Esso Petroleum Ltd on any proposed road closures / diversions/ alternative access arrangements, hours of working and the content of the CTMP. The ES should acknowledge the need for this consultation with Royal Mail and other relevant local businesses / occupiers.

Royal Mail is able to supply the applicant with information on its road usage / trips if required.

Should PINS or the Esso Petroleum Ltd have any queries in relation to the above then in the first instance please contact Holly Trotman *(holly.trotman@royalmail.com)* of Royal Mail's Legal Services Team or Daniel Parry-Jones *(daniel.parry-jones@bnpparibas.com)* of BNP Paribas Real Estate.

Runnymede BOROUGH COUNCIL

Your Ref: EN070005_000008_270718
My Ref: MS

24 August 2018

Major Casework Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Sir/Madam

PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017(THE EIA REGULATIONS) – REGULATIONS 10 AND 11
APPLICATION BY ESSO PETROLEUM COMPANY, LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE SOUTHAMPTON TO LONDON PIPELINE PROJECT (THE PROPOSED DEVELOPMENT)

CONSULTATION RESPONSE BY RUNNYMEDE BOROUGH COUNCIL

I refer to your consultation to Runnymede Borough Council (RBC) in respect of your production of a Scoping Opinion relating to the Proposed Development. This letter details the authority's comments regarding the adequacy of the EIA Scoping Report prepared by the Applicant. In doing so it is noted that the Applicant has acknowledged the reiterative nature of the scoping process and the potential need for further amendments once further scheme details have been developed. RBC supports the production of such a report due to the need to ensure the ongoing assessment and consequent mitigations are properly informed as the final design is reached.

Caveat: RBC has provided the information contained in utmost good faith and without bias. The Council withholds all rights of legal reliance.

Topics Scoped in and out of the Report

RBC acknowledges the Applicants utilisation of a 'receptor based' approach, with topic chapters based on receptors that may be affected. RBC agrees that these appropriately identify the topics and scheme components that should be included and should not be included in the PIER REPORT (September 2018).

The approach to setting the study areas for each topic

RBC notes and agrees the study areas identified in regard to the proposed route of the pipeline through the Borough.

RBC notes the 'key embedded and good practice mitigation relied upon for the scoping process'. RBC recognises the contractual obligations of all parties in adopting this approach. However, we recommend consideration of independent verification during the construction phase.

In keeping with the receptor based approach, detailed findings are presented in the following appendices:

Appendix A

- Chapter 5: Consultation and Engagement
- Chapter 7: Biodiversity
- Chapter 10: Landscape and Visual Effects

} With specific reference to Chertsey Meads

- Chapter 13: People and Communities
- Appendix 2: Regional and Local Planning Policies

Appendix B

- Chapter 11: Soils and Geology – Contaminated Land including landfills and other potentially contaminated land sites on or adjacent to the proposed route

Please do not hesitate to contact us if we can be of further assistance.

Yours sincerely,

[redacted]

Dr Marcel Steward
Strategic Projects Manager

Email: marcel.steward@runnymede.gov.uk

Tel No: 01932 425502

APPENDIX A:

Open Space & Allotments Manager | Runnymede Borough Council

- Chapter 7: Biodiversity
- Chapter 10: Landscape and Visual Effects

inter alia -

- Chapter 5: Consultation and Engagement
- Chapter 13: People and Communities
- Appendix 2: Regional and Local Planning Policies

COMMENTS IN REGARD TO CHAPTER 7: BIODIVERSITY AND CHAPTER 10: LANDSCAPE & VISUAL	
ITEM	**COMMENT**
1) Pipeline routes across Chertsey Meads	The scoping exercise is based on the Order Limits which fall within the preferred corridor J. The Order Limits show two possible routes across Chertsey Meads: i) following the existing route (approx. 400m) ii) new route (1.15km) – identified on SLP interactive map as the 'Initial Working Route' which may be subject to change. Both routes detrimentally affect Chertsey Meads. However, the longer route carries the greater negative impact as it is 3x longer than existing route and impinges on the Local Nature Reserve
2) Policy	
2i) Specific Policy – Chertsey Meads (R8)	Policy R8 of the Runnymede Borough Local Plan Second Alteration Adopted 2001 (2007 Saved Policies) The Borough Council will implement the policies and objectives of the Chertsey Meads Management Plan in order to protect the nature conservation interest and enhance the open space areas used for recreation. COMMENT: The Council wishes to see the Site of Nature Conservation importance restored to its former SSSI status as soon as possible. As a step towards this process, the Meads was designated as a Local Nature Reserve in 1992 (See Policy NE19) The Chertsey Meads Management Plan (1991) seeks to create the positive management of the areas for recreation, and to co-ordinate the various activities and organisations involved. The Management Plan seeks to encourage visitors to less sensitive recreational areas by providing good quality access and low-key facilities. A cycle route has been constructed across part of The Meads from Chertsey Bridge Wharf to Addlestone Moor. As part of the review of the Cycle Strategy, consideration will be given to the provision of a cycle route across the Meads during the consultation process. This is indicative of the Councils wishes and intent to pursue an SSSI status for this site.
2ii) Area of	The following areas are designated as areas of landscape

COMMENTS IN REGARD TO CHAPTER 7: BIODIVERSITY AND CHAPTER 10: LANDSCAPE & VISUAL	
ITEM	**COMMENT**
Landscape Importance Policy NE8 of the Runnymede Borough Local Plan Second Alteration Adopted 2001 (2007 Saved Policies)	importance: a) Coopers Hill, Egham Hill, Callow hill & Runnymede Meadows b) St Anne's Hill c) Woburn Hill & Chertsey Meads d) Land adjacent to the River Thames in these areas the Council will apply the following policies: 1) Special Care will be taken in relation to any proposed development to ensure its siting, scale, height, design and materials are in keeping with the surrounding landscape 2) The Council will safeguard the tree cover and require extensive landscaping for new development 3) Informal recreational use of and public access to these areas will normally be encouraged These areas are recognised as being of particular landscape importance in relation to their surroundings. They are all on the edge of the Thames Valley and are selected principally because of their prominence and setting and in the case of a), b) and c) because of their extensive tree cover. The definition of the area is broad brush and the guidance in the policy is intended for the specific areas identified in the text within which there may be enclaves of little landscape significant and therefore not subject to this policy. The Initial Working Route option would mean the removal of significant numbers of mature trees to the west of the property known as Dumpsey Stump. The document does not appear to recognise Chertsey Meads as a local SNCI of Calcareous grassland (as designated by Surrey Wildlife Trust (source to be determined). This has relevance to other policies from the Local Plan which the Scoping Document should have regard to.
2iii) (NE17) Sites of Nature Conservation Importance Within the County	The Council will safeguard Sites of Nature Conservation importance. Development proposals will not be permitted within or adjoining Sites of Nature Conservation importance which would adversely affect, directly or indirectly, the ecological interests of the site. Policy PE8 of the Surrey Structure Plan (1994) requires Local Planning Authorities to identify proposed SNCI's. They contact flora and fauna of County or Regional value and include a variety of uses such as semi-natural woodlands, unimproved grasslands, marshland, downland ponds and features of geological interest. Some are important because of the long continuity of habitat and others because they are examples of rare or declining habitats for flora and fauna. The Surrey Nature Conservation Liaison

COMMENTS IN REGARD TO CHAPTER 7: BIODIVERSITY AND CHAPTER 10: LANDSCAPE & VISUAL	
ITEM	**COMMENT**
	Group is carrying out a county-wide survey of potential SNCI's, and the criteria used in their selection will be consistently applied throughout the County. Sites identified will be included as supplementary planning guidance until they are included in a review of the Plan. The Council will consult Surrey Wildlife Trust before determining planning applications affecting SNCI's.
2iv) (NE18) Enhancement of Sites of Nature Conservation Importance	The Council will promote the positive management and enhancement of areas of nature conservation value. Opportunities to secure such action, particularly by way of management agreements, will be pursued where appropriate. Arising from Regulation 37 of the Habitats Regulations 1994, local planning authorities should encourage the management of features of the landscape which are of importance for wild flora and fauna, including such features as riverbanks, hedgerows, ponds and small woods. The Borough's Landscape Strategy recognises the important contribution that sites of nature conservation value make to the overall quality of the countryside. This strategy sets the context for positive management policies which are needed to ensure the protection and enhancement of the countryside environment. Management schemes are currently being undertaken at Chertsey Meads and St Anne's Hill.
2v) (NE20) Species Protection	A development proposal will be permitted where it does not cause demonstrable harm to species of animal and plant or its habitat protected by legislation. To avoid harm to the species the Council may consider the use of conditions and planning obligations which seek to: a) Facilitate the survival of individual members of a species b) Reduce disturbance to a minimum c) Provide adequate alternative habitats to sustain at least the current levels of population Article 10 of the EC Species and Habitats Directive (92/43/EEC) requires the protection of such features. In considering proposals for development the Council will therefore normally not grant permission for any proposal which would adversely affect any site supporting such species. Endangered species protected under the 1981 Act may be found in many places not notified as SSSI's. The presence of a 'protected species' is a material consideration when a Local Planning Authority is considering a development proposal which, if carried out, would be likely to result in harm to the species or its habitats.

COMMENTS IN REGARD TO CHAPTER 7: BIODIVERSITY AND CHAPTER 10: LANDSCAPE & VISUAL	
ITEM	**COMMENT**
	In such circumstances the Council will consult English Nature before granting planning permission. Developers must also conform with any statutory species protection provisions affecting the site concerned. In addition, regard will be had to the provisions of the Conservation (Natural Habitats & C.) Regulations 1994 – the Habitats Regulations in relation to the European protected species.
Runnymede 2030 Local Plan (Emerging). The following Policies are taken from the Draft Runnymede 2030 Local Plan. These are draft policy wordings which form part of the Council's submission Local Plan. Although not yet examined (and probably not adopted until 2019), officers consider that some weight could be accorded to the policy. DM officers will therefore give some consideration to the content of the policy in relation to current planning applications	
2vi) Policy EE9: Biodiversity, Geodiversity and Nature Conservation Runnymede Local Plan (Emerging)	Development on or adjacent to the following hierarchy of important sites in the Borough will need to pay particular attention to the requirements of this policy. 1) Ramsar sites (international) 2) 2) Special Protection Areas and Special Areas of Conservation (European) 3) Sites of Special Scientific Interest and National Nature Reserves (National) 4) Ancient Woodland, ancient or veteran trees; and / or trees and hedgerows protected by a Tree Preservation Order 5) Sites of Nature Conservation Importance, Local Nature Reserves 6) Other priority habitats and priority species not identified in 1, 2, 3, 4 or 5 above (Local); designated Local Green Space where richness of wildlife has been identified as a contributing factor to its designation; and any area in Runnymede that may be in the future identified as a Nature Improvement Area; trees considered to make a significant contribution to their surroundings, individually or as a group. The Council will seek net gains in biodiversity, through creation/expansion, restoration, enhancement and management of habitats and features to improve the status of priority habitats and species. Development proposals should demonstrate how this will be achieved and should be in accordance with any Supplementary Planning Document the Council prepares. Development proposals not directly related to the management of Ramsar, SPA, SAC as well as SSSI units forming part of these designations will not be permitted unless it can be demonstrated that the impact of proposals, either alone or in combination, will not result in likely significant effects. If significant effects remain even with the implementation of suitable avoidance and / or

COMMENTS IN REGARD TO CHAPTER 7: BIODIVERSITY AND CHAPTER 10: LANDSCAPE & VISUAL	
ITEM	**COMMENT**
	mitigation, development proposals will need to be demonstrated that alternatives to the proposal have been fully explored and that imperative Reasons of Overriding Public Interest (IROPI) exist. In these exceptional circumstances the Council will permit development where suitable compensatory measures can be implemented. For development proposals that affect national, regional or locally protected sites not forming part of a Ramsar, SPA or SAC, permission will only be granted where it can be demonstrated that the benefits of the development proposal clearly outweigh the harm to the site and has followed the hierarchy of mitigation so that biodiversity/geodiversity damage from development should first be avoided, then mitigated on-site and finally, as a last resort and where acceptable, offset. This has relevance regarding the Meads due to its designation as a Local SNCI and a LNR. It should be noted that Natural England has played a significant role in drafting this policy. Other relevant factors are that Natural England has agreed that the Meads can be used as a SANG to avoid/mitigate impacts from residential development on the SPA, subject to a SANG management plan being prepared. SANGs should be maintained and managed in perpetuity (80 years), so the proposals could impact this site's ability to be used for such a purpose. It does appear that the scoping document recognises Chertsey Meads as a SANG but values that designation as negligible. This may be challenged.
2vii) Policy EE9: Biodiversity, Geodiversity and Nature Conservation Runnymede Local Plan (Emerging) SANG – Justification points 7.79 – 7.83	The identified avoidance strategy to ensure no adverse effect on the integrity of the 7.79SPA from new residential development is by mitigation in the form of SANG. SANG as a mitigation measure has been agreed with Natural England and its provision is required to satisfy the Habitats Regulations. The purpose of SANGS is to attract potential new users away from the SPA but they can in themselves have biodiversity value. Strategic Access Management and Monitoring (SAMM) is an equally important component of the avoidance and mitigation strategy of the Thames Basin Heaths SPA. In March 2007, the Council adopted the SPA Interim Supplementary Planning 7.8 guidance, which provides additional guidance from the Joint Strategic Partnership (JSP), comprised of Local Authorities that are affected by the SPA, alongside other partners, to plan for the long-term protection of the SPA in a consistent and coordinated way. The authorities affected by the SPA have agreed a Joint Delivery Framework, which 7.81 sets out the general principles to be used by authorities when dealing with development within the zone of influence of the SPA. This has the full endorsement of Natural

COMMENTS IN REGARD TO CHAPTER 7: BIODIVERSITY AND CHAPTER 10: LANDSCAPE & VISUAL	
ITEM	**COMMENT**
	England. The approach requires developers of housing schemes to provide, or make financial 7.82 contributions towards, SANG and SANG enhancement in the Borough. With the cap on the pooling of Section 106 contributions introduced by the CIL Regulations (2015) and enacted from April 2016, the Council is required to demonstrate that there is an appropriate mitigation strategy in place. The Council does not currently operate CIL and therefore has introduced a new approach to funding SANG. In addition to larger sites retaining an option to provide a bespoke SANG solution, there is a further option for developers to enter into a land transaction with the Council, for an appropriate financial sum to obtain a consent to utilise part of one of the Council's strategic SANG in mitigation. In the Borough, there are five broad strategic SANGs, which currently have a capacity of 7.83 mitigate the impacts of new residential development. There is a further site at Chertsey Meads, which has been agreed in principle with Natural England to be designated as a SANG, subject to completion of satisfactory SANG Management Plan. There are also bespoke SANGs provided by new development in the borough that have been agreed as part of a package of mitigation for larger developments. This Council will rely on the Borough's existing SANGs, the emerging SANG at Chertsey Meads, bespoke SANG solutions which are to be delivered on some of the proposed strategic allocations (see the Policies Maps and site allocation policies for more information), and other, currently unidentified area of land which the Council could look to allocate in the latter period of the Plan if necessary. The Council will continue to explore delivery options, including with its neighbouring local authorities throughout the lifetime of this Plan to deliver new homes and secure necessary SANG mitigation.
Southampton London Pipeline Project Scoping Report PINS REFERENCE NUMBER EN070005 July 2018: The following comments relate to sections within the Scoping Report	
2ix) Sections 7.3.6 & 7.3.7	Regarding setting the baseline conditions in terms of species – there are many other sources (not identified in the report) which can be consulted to establish the species present or known to visit Chertsey Meads. These include: • RBC commissioned surveys from Surrey Wildlife Trust and others • Surrey Wildlife Trust have carried out surveys on site • Expert advisers from the Chertsey Meads Management Liaison Group including qualified botanists and ornithologists • 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 • Findings from the Council run bat and orchid counting

COMMENTS IN REGARD TO CHAPTER 7: BIODIVERSITY AND CHAPTER 10: LANDSCAPE & VISUAL	
ITEM	**COMMENT**
	sessions NOTE: Chertsey Meads was dedicated as a Queen Elizabeth II Field by Fields In Trust in 2015 which has wider implications for the site in regard to community value and benefit of the site.
2x) Table 7.7	Chertsey Meads LNR is neither Scoped 'In' or 'Out' for hydrological change. We note that the site is located on a flood plain bordered by two rivers which area crossed by Order Limits and contains ponds (not within the boundaries of the Order Limits).
Miscellaneous Items	
2xi) Viewpoints	Runnymede have been requested to provide a response on the view points put forward in the report. These will be subject to a separate meeting and report. However, for the present purposes it should be noted that Viewpoints 55 and 56 would not take into account the most significant potential visual impact of loss of trees at Dumpsey Stump regarding the longer route. Consideration should be given to moving one of the Viewpoints or including an additional location.
2xii) Chertsey Agricultural Show	This has been held annually on the Meads in August for the last 175 years. If works were scheduled to take place at the same time as the Show, it is unlikely that it would be able to proceed. If such an event were to occur, the longer of the proposed routes would be the most disruptive
2xiii) Chertsey Meads Management Liaison Group	This Group has been appointed by the Council to advise in matters relating to Chertsey Meads and should be included in the consultation process
2xiv) Chertsey Meads Plan Area	The shorter of the proposed routes through the Meads will result in the loss of an existing Play Area which will have to be replaced
2xv) Natural England: Higher Level and Mid-Tier Countryside Stewardship Schemes	There is a Higher-Level Stewardship Agreement in place for Chertsey Meads. A Mid-Tier Countryside Stewardship scheme is currently under application. The pipeline construction may impact on the Council's ability to comply with either of these schemes.

APPENDIX B:

Environmental Health and Licensing Manager

Southampton to London Pipeline Project, Runnymede Borough Council

Chapter 11: Soils and Geology - Contaminated Land

A proportion of the land in Runnymede is designated as contaminated

The scoping report addresses Contaminated Land issues in Chapter 11.

The table below shows the potentially contaminated land sites within 250m of the proposed pipeline routes (Site I.D correspond with the plan attached). Sites on this list have been identified using information from historical mapping and any additional information we may hold

Potentially contaminated land site	Use	Potential contamination source
025 Former Pit	Mining & quarrying general	Former Pit
057 Former Pit	Mining & quarrying general	Former Sand Pit
005 Chertsey Gasworks	Gas works, coke works, coal	Chertsey Gasworks Main site
065 Elec substation	Electricity production & distribution	Electricity Switching Station
066 Elec Switching Station	Electricity production & distribution	Electricity Switching Station
070 Saw Mill	Timber products manufacturing	Former Black Boy Saw Mill
082 Former Brickfield	Ceramics, cement and asphalt	Former Brickfield behind Hatch Farm
098 Works and Factory	Transport support & cargo	Factories
102 Former goods yard	Railway land	Former Station Goods Yard
104 Road Haulage	Road Vehicles: Transport	Bates Walk Depot
123 Sewage Depot	Sewage works and sewage farms	Former Sewage Depot
142 Former Laundry	Dry-cleaners	Sandford House Laundry
147 Plessy Works	Engineering Works: Mechanical	Former Plessy Works
148 Laundry and Dry Cleaners	Dry-cleaners	Laundry an Dry Cleaning
150 Saw Mill	Factory or works	Wey Business Park (Black Boy Saw Mills)

Potentially contaminated land site	Use	Potential contamination source
153 Factory or works	Factory or works	Factory or works
154 Gasworks	Factory or works	Chertsey Gasworks Northern Site
157 Factory or works	Factory or works	Hanworth Trading Estate
158 Factory	Factory or works	Factory / Boat Yard
168 Sheet Metal Works	Metal manufacturing	Former Marina Close Sheet Metal Works
172 Chertsey Cemetery	Cemetery or Graveyard	Chertsey Cemetery
174 Cemetery	Cemetery or Graveyard	Addlestone cemetery
177 Hospital	Hospitals	St Peters Hospital
206 Unknown Fill	Unknown Filled Ground	Old Gravel Pit
279 Unknown Fill	Unknown Filled Ground	Unknown Fill
1732 Draft Landfill	Landfill	Black Boy Farm
1886 Draft Landfill	Unknown Filled Ground	St Peters Hospital draft landfill
316 Shell Petrol Station	Petrol Filling Station	Shell Convenience Stores
320 Former Petrol	Petrol Filling Station	Fillup Motor Company Ltd
GE001 Timber Works	Timber treatment works	Bates Walk Timber Works
GE017 Gasometer	Gas works, coke works, coal	Fan Court Gasometer
GE019 Asbestos	Unspecified	Potential Burial of suspected asbestos cement
GE033 Foam works	Chemical Works: Rubber process	Foam Rubber Works
GE034 Works	General manufacture	Wey Industrial Park
GE035 Dentsply Works	Factory or works	Wey Industrial Park 2
GE036 Scrap Metal Yard	Metal Recycling	Current Scrap Metal Yard
GE037 Trading Estate	Engineering works: vehicle	Current Fordwater Trading Estate
GE038 Maintenance Depot	Manuf./repair - Ships, Aerospace	Maintenance Depot
GE039 Council Depot	Road Vehicles: Transport	Current Council Depot

Potentially contaminated land site	Use	Potential contamination source
GE041 Trading Estate	Factory or works	Weybridge Trading Estate
GE062 Works	Timber treatment works	Canal Bridge Works
GE065 former garage	Road vehicles: Garages	Longcross Garage
GE078 Scrap yard	Metal Recycling	Former Scrap Yard
GE114 Waste	Waste Treatment: Hazard waste	Burnt commercial waste
GE121 Possible Pollution	Unspecified	Possible pollution from adjacent uses
GE126 Fuel Depot	Road vehicles: Garages	Bridge House Fuel Depot
GE077 Camphill landfill	Landfill	Camphill Tip
GE0200 Green Lane Draft	Golf Course	Historic EA Draft Landfill Green Lane

The table below shows sites within 250m of the proposed routes with former and/or current landfill uses extracted from the above list (Site I.D corresponds with the plan attached):

Potentially contaminated land site	Use	Potential contamination source
025 Former Pit	Mining & quarrying general	Former Pit
057 Former Pit	Mining & quarrying general	Former Sand Pit
082 Former Brickfield	Ceramics, cement and asphalt	Former Brickfield behind Hatch Farm
206 Unknown Fill	Unknown Filled Ground	Old Gravel Pit
279 Unknown Fill	Unknown Filled Ground	Unknown Fill
1732 Draft Landfill	Agriculture	Historic EA Draft Landfill Black Boy Farm
1886 Draft Landfill	Unknown Filled Ground	St Peters Hospital draft landfill
GE077 Camphill landfill	Landfill	Camphill Tip
GE0200 Green Lane Draft	Golf Course	Historic EA Draft Landfill Green Lane

The historic landfills identified in the initial information request are the EA draft landfill sites listed below.

Potentially contaminated land site	Use	Potential contamination source
1732 Draft Landfill	Agriculture	Historic EA Draft Landfill Black Boy Farm
GE0200 Green Lane Draft	Golf Course	Historic EA Draft Landfill Green Lane

1732 Historic EA Draft Landfill Black Boy Farm

There is information contained within planning file CHE8691 outlining the depth and profiling of the landfilling at this site including a cross sectional diagrams of the fill depths. The void was created during gravel extraction circa 1958

Regarding waste types, there is mention of Class 1(a) natural land, Class II general refuse, with diagrams annotating the filling order and cell areas. There are details on file of instructions to take samples of the water found near the tipping face.

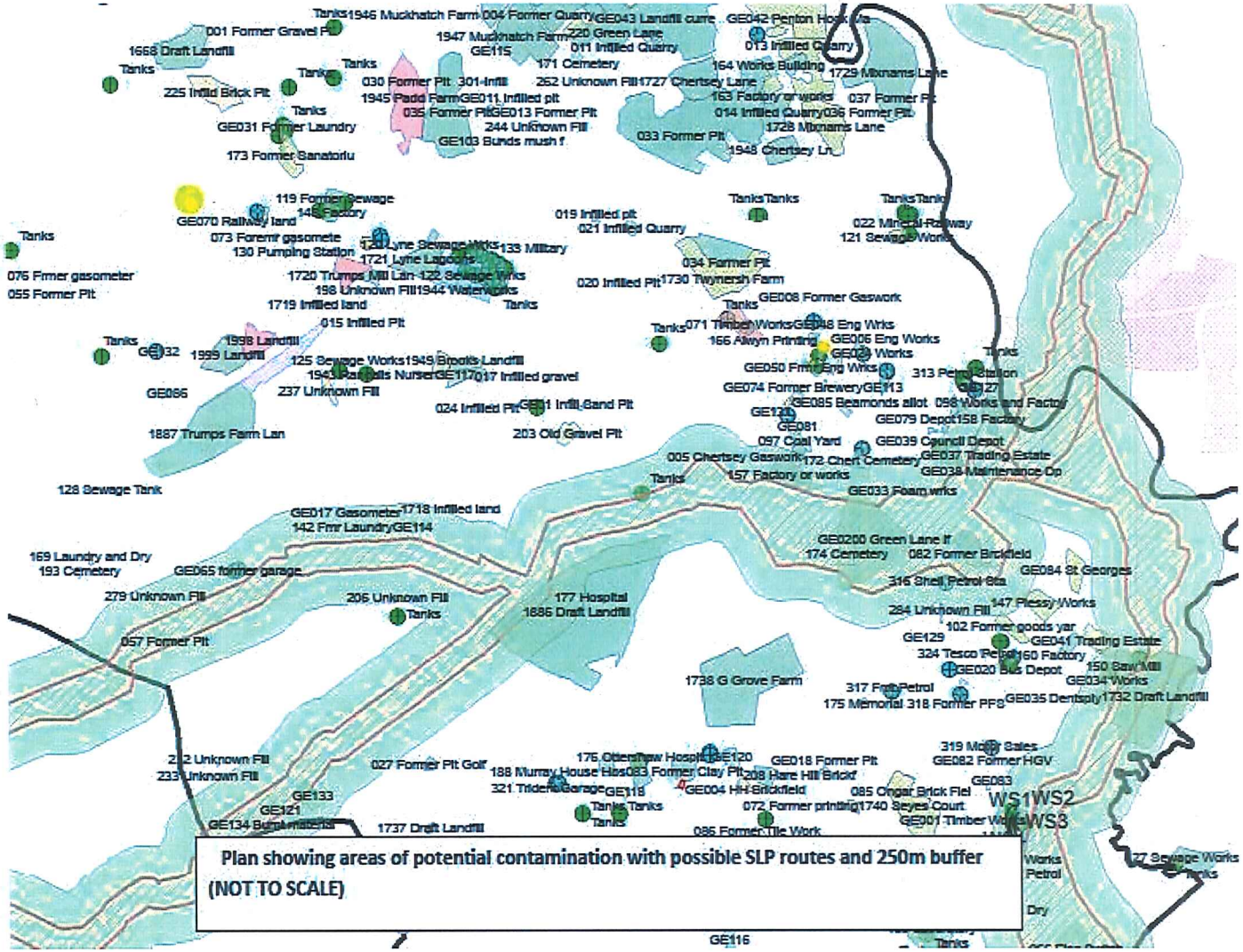
For details of all planning activity regarding the site including recent development proposals for the area, please us the www.runnymede.gov.uk planning pages.

GE200 Historic EA Draft Landfill Green Lane, Addlestone

We do not hold any information regarding the filling of this area. It is currently used as a golf course. No investigations have been carried out at this area into ground conditions to the best of our knowledge. There is some anecdotal information to suggest infilling comprised of M25 overburden inert material.

The majority of these sites have been identified within the scoping report. Further consideration for the disturbance of potentially contaminative soils should be made when and if the final route meets these sites. Spoil from excavations at these potentially contaminative sites should be stored effectively and if planned for removal from site, should be WAC tested.

A watching brief should be maintained at all times along the route, for an unexpected visual or olfactory evidence of contamination.



Plan showing areas of potential contamination with possible SLP routes and 250m buffer
(NOT TO SCALE)

Runnymede Borough Council, Civic Centre, Station Road, Addlestone, Surrey, KT15 2AH
Tel: 01932 838383 Fax: 01932 838384 www.runnymede.gov.uk www.runnymede.gov.uk/enews

From:	John Thorne
To:	Southampton to London Pipeline Project
Cc:	Keith Holland; Debbie Salmon
Subject:	FAO Marie Shoesmith
Date:	17 August 2018 14:58:38

Your Ref EN070005_000008_270718

Dear Ms Shoesmith 17th August 2018

Esso Petroleum Company, Limited SLP Project – Consultation on Environmental Statement Scoping Opinion

Thank you for your letter dated 27th July 2018.

Response on behalf of Rushmoor Borough Council

Basingstoke Canal SSSI

The Basingstoke Canal SSSI has been scoped out for further assessment due to the directional drill envisaged. Welcome the directional drill and acknowledge this will alleviate impacts on the water quality and aquatic vegetation, the canal is also designated for its marginal vegetation and the rare species of dragonfly and damselfly that use the canal corridor. There is no mention of safety measures to preserve these features of the SSSI from disturbance or vibration. It is recommended that the Basingstoke Canal be scoped into the EIA to ensure all impacts on the SSSI are identified and mitigated if required.

Sites of Interest for Nature Conservation

There are four SINCs, within Rushmoor Borough, that are likely to be impacted by the works.

- South of Ively Road
- Cove Brook Grazing Area
- Cove Valley Southern Grassland
- Blackwater Valley Frimley Bridge

All of these sites contain aquatic and wetland habitats or wet woodland. There is concern that the wetland habitat, waterways and wet woodland are scoped out for further assessment. These sites are of County importance for their habitats and Rushmoor Borough Council would expect all habitats within the SINC and protected species using the site to be assessed for impact and fully mitigated within any development.

Southwood Golf Course SANG

The least damaging route across this site with the least disruption to wildlife or visitors should be pursued. Ideally trenching should be done before the SANG opens in September 2019. If this is not possible compensation for habitat disturbance and disturbance to visitors must be considered. This site must create a natural experience away from the Thames Basin Heaths SPA.

Waterways

There are five waterways within Rushmoor to be impacted by the development.

- Ively Brook
- Cove Brook
- The River Blackwater
- Unnamed tributary near Farnborough
- The Basingstoke Canal

The above disturbance means that every waterway within the borough is impacted by this development. There is concern that it is intended only to directional drill under two of these waterways. Rushmoor Borough Council would require the EIA to consider the individual and in-combination impacts on the water environment and any surrounding wetland habitat within the EIA process.

Ancient Woodland

Ancient woodland has been scoped out of the EIA as the pipeline will not be passing through any sites. It would appear from the report that the assessors have relied on Natural England's Ancient Woodland Inventory. This system only identifies ancient woodland, which is 2ha or more and misses small fragments. Unless it can be proved through survey that woodland to be impacted is secondary we would expect ancient woodland fragments to be identified clearly and impacts fully assessed within the EIA process.

Wet Woodland

The wet woodland within the locality of the SINC is an important feature of this site and is likely to support an important invertebrate assemblage. Previous surveys have found a number of rare species within the SINC and we are about to survey again as part of the SANG planning. Rushmoor Borough Council would expect all wet woodland to be disturbed to be assessed within the EIA process.

Lowland Mixed Deciduous Woodland

The EIA scoping report scopes out Lowland Mixed Deciduous Woodland for further assessment merely due to Surrey and Hampshire have a good resource of this habitat. The extensive tree cover within the Counties provides a continuous corridor for species associated with this habitat that could be fragmented by a 30m corridor. The mitigation of planting new trees will not reach maturity for many years and there is likely to be a long-term impact on the woodland sites. Rushmoor Borough Council would expect at least habitat fragmentation to be included for further assessment within the EIA.

Hedgerows

Hedgerows are scoped out of the EIA. The justification appears to be that the 10m gaps can be repaired by replanting. However, replanted hedgerow sections will be of lower biodiversity value and some hedgerows maybe important under the Hedgerow Regulation 1991. All hedgerows should be surveyed, with avoidance measures put in place to limit the disturbance of important hedgerows. In other landscape scale schemes the applicant has directionally drilled under

hedgerows that were important under this legislation and this scheme should do likewise.

Acid Grassland

The EIA scoping report states that there is no acid grassland outside the SPA. This is not accurate. Acidic grassland is present within the SINCs associated with Southwood Golf Course with other pockets found throughout the borough. This habitat should be scoped in to the EIA if it is to be disturbed as it provides valuable stepping stones between the SPA heathland blocks.

Brown Hare

Brown hare has been scoped out. If brown hare are present, we would expect the route to be walked before drilling and any leverets identified and avoided.

Yours Sincerely

John W Thorne
Development Manager
Rushmoor Borough Council
http://www.rushmoor.gov.uk
01252 398791

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20 August 2018

Marie Shoesmith,
Senior EIA and Land Rights Advisor,
The Planning Inspectorate,
Major Casework Unit,
Temple Quay House,
2 The Square,
Bristol,
BS1 6PN

Via E-Mail: SouthamptontoLondonPipeline@pins.gsi.gov.uk

Dear Ms Shoesmith,

Southampton to London Pipeline – Scoping Consultation

Thank you for your letter, dated 27 July 2018, requesting the comments of the SDNPA on the applicants report that accompanied their request for a Scoping Opinion from the Secretary of State.

The SDNPA comments as follows:

Landscape

The size of the Scoping Report suggests that relevant sections for the South Downs National Park may need to be given specific areas of the ES. As this is a large project which runs through 22km of the National Park (and includes specific alternative methods for assessment and scoping of features together with mitigation has been recommended) the use of work sections to break up the assessment is useful.

With regard to National Park specific policy it is suggested that reference is made to the full list of the SDNP Special Qualities (https://www.southdowns.gov.uk/discover/why-are-we-a-national-park/sdnp-special-qualities/). Also recommend is reference to English National Parks and the Broads – Government circular 2010 (paragraph 31 in particular – Major Developments - https://www.gov.uk/government/publications/english-national-parks-and-the-broads-uk-government-vision-and-circular-2010).

Reference to the South Downs Integrated Landscape Character Assessment (SDILCA) is noted and supported; the inclusion of the key features of the relevant LCAs is also noted and supported. However there are also significant areas of the SDILCA text which refer to, for example, drivers for change, key sensitivities, development management considerations etc which are not covered by the descriptions of the key features and it is recommended that the assessment takes these further issues into account at both the LC Type and LC Area level descriptions. It is important to ensure that a methodology which assess the proposals effects on the key features of Landscape character and the full accompanying descriptive text in the SDILCA is followed through into the Landscape and Visual Impact Assessment.

Suggest embedded mitigation (set out in table 4.6) should include the setting of construction compounds and an approach to their locational choice.

There are two conflicting approaches to the landscape assessment in terms of the approach to vegetation loss - firstly the lack of information about vegetation loss and secondly how this is feeding into the landscape assessment. On the one hand the route is to be designed with mitigating design, but there are also no certainties about vegetation removal. The approach to mitigation is set out in 10.4.11 although there is no methodology set out for how this will be assessed, and therefore assessing how appropriate mitigation will be. It would be helpful to understand how this draw down into detail design will be undertaken, beyond the commitment to the REAC. It is considered that some of this work could be drawn up in outline to inform the REAC in detail.

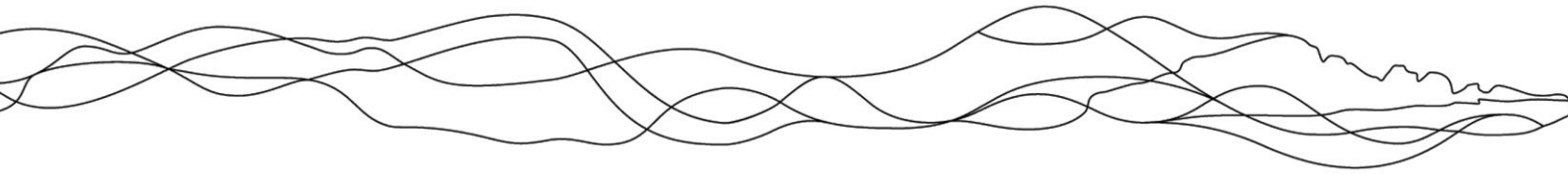
However, in 10.4.13, with reference to assessing effects on landscape character, it is stated that it is not possible to assess impacts on landscape character. There is no description of how this will be undertaken. Therefore it is difficult to see how impacts on landscape character can be robustly assessed.

GLVIA 3 sets out that the assessment of landscape character impacts should consider how the key features of the landscape would be affected as identified in the appropriate LCA. It has been agreed with ESSO that the South Downs Integrated Character Assessment is the appropriate level assessment for the project within the SDNP. It is recommended that this is incorporated within the assessment of landscape character (commented on above), which also reflects the potential impacts on vegetation patterns which is clearly a key feature in any part of the SDNP, the particular nuances of which for each character area will be set out in the SDILCA.

Loss of vegetation is set out as a key influence on the degree of mitigation. It is suggested that further work is done on the baseline information which would provide greater clarity on this at an early stage including land cover mapping, priority habitat mapping and woodland/hedgerow mapping. This would then enable a more detailed assessment of the likely impacts on vegetation removal due to the proposals to be assessed and the appropriate mitigation proposed.

Vegetation is recognised as an important issue to consider in the LVIA (chapter 10). SDNPA agrees with this assertion however the main references for avoidance mitigation are Ancient woodland and TPO trees. TPO designation is generally used for trees which are under threat in urban and peri urban areas due to their high amenity value & pressure for removal. The SDNP is a heavily wooded area and as a result given that much of it is rural, TPO legislation is rarely made use of as it would be impractical to TPO all of the trees in the SDNP. This is because it is considered that the landscape designation and restrictive planning policy within the SDNP affords an appropriate degree of protection to these ‘non designated’ trees and the wider landscape.

Unfortunately this seems to have been interpreted in the scoping report that these non TPOd trees are ‘undesignated’ features and as a result are considered to have lesser importance in the scoping report within the SDNP. It is not considered that the scoping report gives this issue sufficient weight and the SDNPA recommends that further work is undertaken to demonstrate the appropriate level of consideration and assessment of the



likely impacts to woodland, trees and hedgerows in particular in their own right, but also as elements and features of the relevant landscape character types and areas.

It is recommended that both purposes 1 & 2 of the SDNP are included in the LVIA (chapter 10) as relevant to the study in accordance with GLVIA3) rather than just purpose 1. Purpose 2 sets out that the authorities should 'Promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public'. This purpose is clearly related to the landscape character and features of the landscape and how they are perceived by the public and should be considered alongside Purpose 1.

The location of construction compounds within the SDNP is an important issue. Whilst it is understood that these are temporary, it is also considered that they will be the focus of a large amount of activity during the construction phase and therefore require careful siting to avoid both visual and experiential impacts on visitors, tourists, residents and the landscape of the SDNP. A rationale for how these have been sited in the SDNP is requested. Alternative options should be explored to minimise traffic, intrusion, construction and temporary /permanent harm to the landscape.

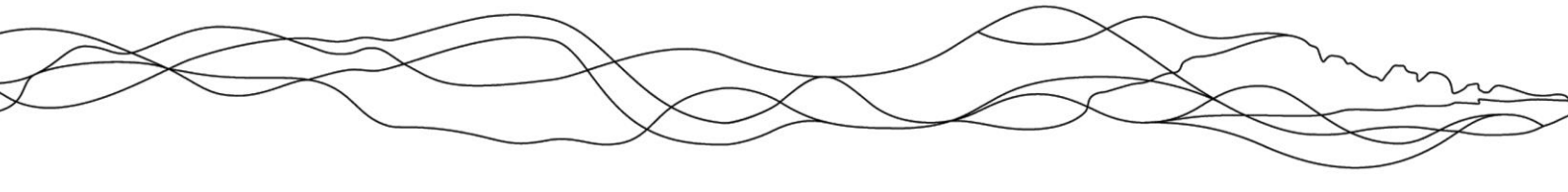
It is noted that Stephen Castle down and Brockwood Park (which have previously been flagged as sensitive areas to the development proposal and where alternative routes have been specifically requested by SDNP) are shown in the scoping report as having sites for construction compounds. Stephen Castle Down is a particularly high point on the route within the SDNP and likely to be visually sensitive. Brockwood Park is noted for its tranquillity and is a site of quiet reflection and meditation. The location of a site compound in the vicinity of the park would be likely to affect tranquillity in combination with potential for views over the construction site itself depending on which route corridor is selected. This also raises the issue that SDNPA have recommended careful assessment of this part of the route due to the impacts on a range of receptors and have suggested that an alternative route away from Hinton Ampner/Brockwood Park be considered.

The potential for construction effects has been identified in 10.4.8, the additional following effects are also suggested for inclusion in the assessment within the SDNP:

- Noise and intrusion in remote areas within the SDNP due to vehicle, plant and human sounds;
- Additional signage, new industrial site entrances; and
- Lighting affecting Dark Skies – the possibility of night work is noted and any impacts on the SDNP Dark Skies reserve should be assessed.

With regard to representative viewpoint selection it is noted that the representative viewpoints have been selected without being informed by a zone of theoretical visibility (ZTV)plot. The SDNPA considers ZTV essential for this scale of project within the National Park, regardless of its temporary nature. The ZTV is recommended taking into account the park's topography and level of tree and woodland cover which makes it problematic to anticipate where views may occur. An appropriately plotted ZTV can define these locations with some accuracy. It is noted that work to produce a ZTV is underway at which time the SDNPA will be able to assist with representative viewpoint selection.

Representative viewpoints and assessments should include the location of compounds within the SDNP. It is noted in 10.5 that construction compounds will be considered in the



representative viewpoints however, those shown in the figure 'Landscape constraints and representative viewpoints' do not appear to do this.

With regard to the protection of existing trees – the proposal for using several methodologies for the protection of existing trees is confusing and a clearer methodology in the SDNP is desirable taking into account the comments made above. It is recommended that a single methodology is used & preferably BS5837 – 'Trees in relation to demolition design and construction 2013' to guide the protection of existing trees. The NJUG guidelines are considered to be relevant to more urban areas than the SDNP.

Effects on Tranquillity within the SDNPA should be appropriately considered – whilst this is identified in the scoping report there is no reference to a methodology for doing so. It is suggested that this area of study should be considered at an early stage to ensure that the location of the route alignment and in particular the construction compounds do not coincide with areas of high tranquillity and low intrusion levels. Assessing the effects of a proposal on tranquillity is not an exact science and it requires an understanding of the likely effects on positive and negative characteristics of tranquillity including traffic activity including to and from construction compounds, but also traffic along the haul roads within the construction site itself, constructional processes, numbers of employees working etc and the assessment of the impacts of these effects on the existing tranquil characteristics of the environment. It may be appropriate to undertake some specific sample tranquillity assessments along the route to groundtruth areas of concern. The SDNPA has an established process for undertaking such tranquillity assessments and will able to advise on this if needed.

Biodiversity

The biodiversity scoping is considered to contain all the relevant areas and the impact assessments appear appropriate as they stand. However, it is understood there are a suite of ecological surveys being undertaken this summer and there may be additional information that could impact on some of the species assessments. The only species that are scoped out of the assessment are badgers and birds, but with the former especially there is a potential impact if badger setts are found along the route.

Water

The water scoping is considered to contain all the relevant areas and the impact assessments appear appropriate.

Public Rights of Way

Paragraph 4.7.63 states that "all PRoWs including, National Trails, crossing the working area will be managed and access will only be closed for short periods while construction activities occur. Powers for temporary diversions and stopping up of PRoWs will be contained within the Development Consent Order"

It will be important to understand the definition of short periods. As an example of good practice which we would like to see, we refer to the Rampion scheme and the management of public rights of way closures and diversions during the construction period (https://www.rampionoffshore.com/wind-farm/construction-progress/onshore-progress/).

This page and the attached pdfs show the level of information available to the public and explain how it is communicated. In addition, as part of the Rampion scheme, there is a requirement that where the South Downs Way National Trail is temporarily diverted, the diversion should be of the same quality standard as the National Trail itself.

Paragraphs 13.3.24 – 13.3.27 discuss recreational activities including access land, rights of way and long distance trails. However, it is unclear whether these activities are scoped into any assessment of the impacts during construction and operation. Any closures of Access Land during the construction period should be approached using the same methodology referred to above for PROW and communicated effectively both on site and to local stakeholders.

It is noted that PROW are not identified as tourism receptors. We would disagree with this. The South Downs Way in particular is promoted as a tourism asset and attracts national and international visitors. We estimate in the region of 20,000 visitors walk the trail annually. This figure does not include incidental use of the trail by users on the wider rights of way network. During Construction, there is potential for significant impacts on public rights of way including the South Downs Way. This should be addressed in the scoping report.

Trees and Woodland

It is not clear which best practice is being used where and, without more graphical illustrations of the mitigation measures and arb method statements, it is not possible to assess how the proposed measures would be delivered in practice.

It is also noted at this stage that:

- Specific details of the impact of construction practices should be set out at the application stage as the impact upon trees, and subsequent impact upon landscape character, is a principle matter;
- There is little cross over between the tree and ecological impacts; this should be strengthened; and
- The standing advice for AW and veteran trees does not appear to be being fully complied with, and the BS5837 is being adapted to suit. Accordingly, these should not be scoped out.

We trust that the information above will be of assistance to the Secretary of State in forming their scoping opinion.

Yours Sincerely,

David Cranmer BSc (Hons) MSc MRTPI
Development Management Lead

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Chief Executive: Trevor Beattie

Southampton to London Pipeline Scheme

Summary of comments from Spelthorne Borough Council (August 2018)

General Comments

These comments are made on the basis of Figure 3.2 Sheets 13 & 14 showing the proposed construction corridors for Sections G and H through Spelthorne, including the sub-option through Laleham/ Ashford. Within Figure 3.2 details of various elements of the proposed development have not yet been finalised through the Spelthorne area. However, we are also aware that negotiations are ongoing with land owners which could result in routing changes (not shown in Figure 3.2) at various points along Section H. Some changes being considered could represent an effectively different proposed development through some local communities. We request that the applicant continue to make every attempt to narrow the range of options ahead of the Preliminary Environmental Information Report (PEIR) consultation.

As a consequence of these ongoing routing decisions, no detail has yet been provided on the access points under consideration for construction, operational and maintenance phases of the proposed development, and therefore we are unable to make comment about the local impacts of these.

Chapter 3 (Description of the Development)

Table 3.2 (Rural and urban working assumptions, page 3-31) sets out proposed standard construction working hours as Monday to Saturday 07.00 – 19.00. Spelthorne's standard hours of work for construction sites is 08.00 – 18.00 Monday to Friday and 08.00 – 13.00 Saturday and at no time on a Sunday, Bank Holiday or Public Holiday - https://www.spelthorne.gov.uk/article/1885/Noise-from-demolition-and-construction-sites . For routine works outside of these houses we would expect contractors to make a section 61 application under the Control of Pollution Act 1974. We are concerned that justification has not been made for extended hours of work through urban areas. We consider that working hours of 07.00 – 19.00 are normal working hours for surface mineral extraction not construction activities, where a ten hour working day is the norm.

In accordance with BS5228-1:2009+A1:2014 ('Code of practice for noise and vibration control on construction and open sites') we considered that where construction works are required to continue 24 hours a day, additional mitigation and more stringent assessment criteria should be applicable. We would expect that arrangements should be made to minimise HDV (Heavy Duty Vehicle) movements outside normal working hours through ensuring sufficient on-site storage areas for construction materials, soil and debris to allow short-time stockpiling over evening, night times or weekends.

Table 3.2 (Rural and urban working assumptions) outlines that removal of excavated spoil off-site would occur in urban areas of the proposed development route, but would be limited at rural sections of the development. It is noted that this is further clarified in the Appendix 7 Waste Technical Note which details that "any excavated material from the landfill is likely to be classified as a waste and (dependent on the environmental permit status of landfill) would not be reused in situ". Section H of the route through Spelthorne passes or crosses through 13 authorised or historic landfill sites. We are therefore concerned that appropriate method statements are prepared and followed with respect to reinstatement of landfill sites to ensure that appropriate

capping of sites is maintained and that there is, as a minimum, no worsening of risks to land users, property and the environment. Table A7.5 (Waste capacity for waste likely to be generated from the Project) provides indicative quantities of wastes to be generated from the project, but it is not clear if the amount of imported aggregate/ inert materials and topsoil that would be needed to reinstate landfills and areas of made ground has been calculated and whether this has been factored into the number of HDV traffic movements, e.g. Table A8.2.5 Urban Construction traffic movements (Section H).

Chapter 4 (Design Evolution)

Any mitigation relied upon for the purposes of the assessment should be explained in detail within the Environmental Statement (ES). The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, with reference to specific Development Consent Order (DCO) requirements or other legally binding agreements.

Table 4.7 (Location-specific embedded mitigation assumed for Scoping, page 4-37) outlines that in Section H movement of the alignment west wards at Old Littleton Road is embedded mitigation to avoid alignment through the traveller site and to allow for alignment to be moved away from the roadway of Old Littleton Road. This does though move the alignment into two historic landfill sites - thus mitigation against one set of issues does still have other negative implications.

We are reassured that section 4.7.53 outlining air quality mitigation measures for dust and particles includes a list of most of the management and control measures appropriate for medium and high risk sites in accordance with the Institute of Air Quality Management dust risk assessment guidance (IAQM, Guidance on the assessment of dust from demolition and construction, 2014). As per comments under Appendix A1, these measures are though not translated into the draft Code of Construction Practice (CoCP).

Paragraph 4.7.55 outlines that on-site and off-site inspections would be undertaken to monitor dust including dust soiling checks of street furniture, cars and flat surfaces around the site boundary. Dust levels should be considered not only at properties at the site boundary but also access roads junctions onto the public highway, local footpaths, any public Rights of Way and other sensitive receptors.

It is also noted that neither the draft CoCP, sections 4.7.53-55 (air quality mitigation) or 4.7.60 (traffic management) provide for emissions standards for Non-Road Mobile Machinery (NRMM), nor HDV emission standards, such as achieving fleet standards of EURO VI or better, or FORS/CLOCS fleet accreditation standards.

Chapter 6 (Impact Assessment Methodology)

Table 6.1 (Sensitivity and value criteria, page 6-1) outlines that a low value/ sensitivity will be assigned to local ‘value’ receptors. Local residential receptors could be undervalued under this criteria, and effect the significance attributed to impacts upon local residents.

Chapter 7 (Biodiversity)

Dumsey Meadow Site of Special Scientific Interest (SSSI) in Section H on the north side of the River Thames crossing at Chertsey is the only grazed unimproved Thames side Meadow in Surrey. Any routing through the SSSI could have potentially significant impacts on the floral species. Any new route and construction works through Dumsey Meadow SSSI would be of serious concern to Spelthorne Borough Council. We understand from the Environmental Impact Assessment (EIA) Scoping stakeholder engagement workshops in August 2018 that contrary to Figure 3.2 (Sheet 13 of 14) a route through the Meadow is no longer being considered.

Due to the numerous options that exist at this stage for the River Thames Crossing at Chertsey in the evolution of the Proposed Development, Spelthorne considers that it would be inappropriate though to scope out potential impacts to Dumsey Meadow SSSI at this stage.

On Figure 3.2 Sheet 14 of 14 the proposed corridor is shown as encroaching into Ashford cemetery. At the EIA Scoping stakeholder engagement workshops in August 2018 the applicant's consultant has confirmed that the applicant has no intention of crossing any cemetery land and its close proximity was due to the way the CAD drawings were created. On this basis we make no further comments on this issue.

In relation to pre-construction surveys (4.7.19) we would recommend that in conveyance with onsite surveys to determine species presence, suggested mitigation factors would also be determined by ecological contractors and subsequently acted upon.

At this stage of scheme development, the applicant has not yet determined which river and road crossings will be trenchless, and if so what technique. Consequently, we are unable to comment about the potential significance to impacts at individual crossings. We have some reservations about potential impacts to waterways whereby the route will be constructed via open cut trenches and the water flow put through a pipe or flume during the trenching. We would like to engage further with the applicant to minimise impacts as the scheme design evolves further.

Chapter 11 (Soils and Geology)

In light of the potential for contamination issues to arise through excavation in contaminated ground, the provision of specific measures to control impacts within a Construction Environmental Management Plan (CEMP) is welcomed.

Section 11.2.12 outlines the guidance and advice documents considered in this chapter. However there are a number of standard industry reference documents that set out best practice for investigation, assessment and remediation methodologies that are absent from the EIA Scoping Report. These notably include:

- BS10175:2011 + A1:2013 – British Standard, 2011/13, Investigation of Potentially Contaminated Sites

- BS5930:2015 – British Standard, 2015, Code of Practice for Ground Investigations
- BS EN 1997-2:2007 – British Standard, 2007, Geotechnical design – Ground investigation and testing
- ICE, 2012 – Institution of Civil Engineers (ICE) UK Specification for Ground Investigation, 2nd Edition
- LQM/ CIEH S4ULs – Nathanail, C et al, 2015, The LQM/ CIEH S4ULs for Human Health Risk Assessment
- Defra C4SLs – CL:AIRE, 2014, SP1010 Development of Category 4 Screening Levels for Assessment of Land Affected by Contamination. Final Project Report Revision 2.
- SOBRA, 2017, Development of Generic Assessment Criteria for Assessing Vapour Risks to Human Health from Volatile Contaminants in Groundwater
- CIRIA C665 – CIRIA, 2007, Assessing Risks posed by Hazardous Ground Gases to Buildings
- BS8576:2013 – British Standard, 2013, Guidance on Investigations for Ground Gas, Permanent Gases and Volatile Organic Compounds
- CL:AIRE RB17 – CL:AIRE, 2012, Research Bulletin (RB17): A Pragmatic Approach to Ground Gas Risk Assessment
- CIRIA C733 – CIRIA, 2014, Asbestos in Soil and Made Ground: a guide to understanding and managing risks

This overlooked list of guidance is also particularly relevant to section 8.7 of Appendix 3 of the Environmental Survey Methodology Report.

Sections 11.3.50 & 51 incorporate all the historic and authorised landfills relevant to the consultation corridors in our area. Spelthorne has been working with the applicant's consultant to provide and refine the available information about the age, nature and type of landfills in our area, and further to identify what pre-existing monitoring and site investigation information might exist to assist with advance characterisation of land sections. This process is ongoing and consequently we recognise that the applicant's consultant has not had all the information to yet compile into the baseline position for our area.

Section 11.3.56 outlines that previous fuel loses from the existing pipeline have been minimal and remediated to the satisfaction of the local landowner, whereas Table 11.11 (page 11-21) states that loss to ground has been managed and remediated to the satisfaction of the regulator. No further details of these loses are provided such as how, why, when, where, how much and how dealt with - was this a single incident, or have there been multiple occasions of fuel loss. These statements indicate that there have been previous loses in operational use of the existing pipeline. As no details are provided about these losses, it is not possible to be assured that the new pipeline does not also entail the same operational risks. Yet paragraph 11.4.16 says that contamination risks during operation are "not considered significant because of the project design and operating practices....also there is empirical evidence for the validity of this approach from past operation of the existing aviation fuel pipeline". No reference is provided for the empirical evidence and no further details are provided in justification.

Table 11.13 discusses criteria for determining the magnitude of change with respect to land contamination. For example, a large magnitude is given to arise when contamination levels are encountered in excess of assessment criteria (for human health, environment and or property). Neither Chapter 6, Chapter 11 nor any appendices appear to define what assessment criteria will be used. It is not clear whether these would be published generic assessment criteria (GAC) only, or whether if these were exceeded site specific criteria or detailed quantitative risk assessment (DQRA) would be employed. In other words, the approach to risk assessment for human health, controlled waters and other receptor types has not been specified: what hierarchy might apply to generic assessment criteria; what approach would be taken where GAC are not available for certain contaminants; what approach will be taken toward risks from asbestos fibres in soils; what acceptance criteria will be employed for imported soils, and will this take account of phytotoxic contaminant levels. It is also not clear what threshold level would be employed in contamination assessment - in section 11.2 both the Part 2A regime and the planning regime are discussed, but no approach is put forward as to whether the contamination assessment will be benchmarked against not being capable of being determined as Contaminated Land under Part 2A (i.e. not being significant potential of significant harm, SPOSH) or against minimal risk levels.

It is noted that paragraph 14.4.40 states that the effects of land contamination on human health is scoped out and will not be assessed in the EIA. Whilst we agree that land contamination can be scoped out of a health impact assessment, so as not to double count impacts, this statement should be clarified to ensure that it is clear that these impacts have not been scoped out altogether.

Planning Inspectorate Advice Note 7 suggests that the scoping report should contain all of the information required in order to make a screening request, and additional information, including:

- “guidance and best practice to be relied upon, and whether this has been agreed with the relevant bodies (for example the statutory nature conservation bodies or local authorities) together with copies of correspondence to support these agreements;
- methods used or proposed to be used to predict impacts and the significance criteria framework used.”

It is our opinion that the EIA Scoping Report currently does not provided this required additional information.

<u>Chapter 16 (Cumulative effects)</u>

In Table 16.2 (Potential Intra-development cumulative effects) it is unclear why dust/ sediments could not affect local residents, especially in urban areas, as per noise and vibration given that the Zone of Influence for dust at 200m is greater than vibration and some of the noise impacts that have been ticked.

We agree that in refining the Long List (Appendix 9) of proposed developments that could give rise to inter-development cumulative impacts, residential developments of less than 10 residential dwellings could be scoped out. The other defined criteria for

narrowing the list include office/ light industrial, general/ industrial, and retail proposed developments being greater than one hectare in gross size to be retained into Stage 2. The professional judgement applied in Table 16.4 indicates that this criteria is not applicable as they have in fact carried forward a number of developments considerably smaller than 1 hectare in size. In accordance with our Core Strategies and Policy EN3, Spelthorne requires an air quality assessment for commercial and industrial developments of greater than 1,000sq.m floor space. Thus, developments significantly larger than those we might consider to have the potential for significant air quality impacts on their own are to be excluded from further consideration of cumulative effects.

Policy EN3: Air Quality

The Council will seek to improve the air quality of the Borough and minimise harm from poor air quality by:

a) supporting measures to encourage non-car based means of travel,
b) supporting appropriate measures to reduce traffic congestion where it is a contributor to existing areas of poor air quality,
c) requiring an air quality assessment where development:

- i is in an Air Quality Management Area, and
- ii generates significant levels of pollution, or
- iii increases traffic volumes or congestion, or
- iv is for non-residential uses of 1000 m² or greater, or
- v is for 10 or more dwellings, or
- vi involves development sensitive to poor air quality

d) refusing development where the adverse effects on air quality are of a significant scale, either individually or in combination with other proposals, and which are not outweighed by other important considerations or effects and cannot be appropriately and effectively mitigated,
e) refusing development where the adverse effects of existing air quality on future occupiers are of a significant scale which cannot be appropriately or effectively mitigated and which are not outweighed by other material considerations.

The process of narrowing down the selection of possible developments for the cumulative effects assessment also sets criteria to exclude any applications consented before 2017 but not yet started. However, for major developments there can often be a number of renewals or variations to consented schemes before construction finally commences, and thus some local knowledge will be beneficial to ensure that all schemes likely to be brought forward again are included in the assessment.

Table 16.4 (Developments scoped into Cumulative Effects chapter of the ES (Short List) sets out other local proposed developments retained on the Short List from the Long List at Appendix 9. Item 1, Heathrow Expansion – Adding a Northwest Runway at Heathrow states that this development is located 3.55km to the north of the SLP Project. However, the Heathrow Expansion Project is not just construction of a North West runway. The proposed Heathrow expansion involves the remodelling and

expansion of the existing Heathrow Airport (the Airport) to enable an increase in operating capacity from 480,000 air transport movements (ATM) per annum to at least 740,000 ATM per annum, and from around 76 million passengers per annum (mppa) to 130 mppa. The current airport operational boundary is inside 800m north of the SLP consultation corridor in Spelthorne. The key components of the Proposed Heathrow Expansion Project outside the current operational boundary include (in addition to a third runway and other components within the existing airport boundary):

- re-alignment of the M25 motorway and other road network changes including diversions to the A4 and A3044 and associated junction works;
- diversion of the River Colne, the Colne Brook, the River Wraysbury, the Longford River and the Duke of Northumberland's River and creation of compensatory flood storage;
- delivery of airport supporting facilities including, but not limited to: cargo floor space; fuel storage; maintenance, repair and overhaul floor space; an air traffic control tower; upgraded and new waste water treatment and network infrastructure; diversion, relocation, protection and/or expansion of the public utilities network; energy generation plant; upgraded and new waste and recycling centres; and consolidation of car parking;
- the displacement of certain commercial uses, infrastructure and major facilities currently in place at the existing airport such as: immigration removal centres; Lakeside Waste Management Facilities; British Airways' Waterside office; BT data centre and maintenance depot; Total fuel depot; SSE substation and pylons; Total rail head; and
- temporary construction facilities, including contractor compounds, lorry parks, concrete plants, assembly facilities, borrow pits, stockpiles and construction workers' accommodation. The Applicant also proposes to use offsite logistics hubs located across the UK for the delivery of materials.

The applicant of the Heathrow Expansion project estimates that the proposed development will require a peak construction workforce of up to 15,000 workers. The Heathrow Expansion Masterplan boundary (i.e. sites identified for potential Expansion development components) covers up to 350 hectares within the Borough of Spelthorne across the areas of Stanwell Moor, Stanwell and North Ashford.

We therefore contend that the Heathrow Expansion project is not remote from the SLP Project and that potential cumulative impacts of the two projects is wider than just traffic as has been scoped in within Table 16.4, and could have inter-development cumulative effects relating to air quality/ dust, hydrological changes, landscape and visual changes, community impacts, noise and vibration, and major accidents.

It would be helpful if the Long List in Appendix 9 could be grouped by Section of the Route, or local authority area, to aide review of the list of other developments in a logical order, especially as the List continues to be added to as the scheme develops.

Appendix A1 Outline Code of Construction Practice

Currently the Code of Construction Practice is only an outline of possible content and no firm commitments are made. The language of the CoCP is that the "contractor could be required" or "the contractor may be required". Therefore, it does not currently provide an adequate level of reassurance that best practice guidance will be required to be followed. It does not include assurance of all mitigation measures set out in Chapter 4 of the EIA Scoping Report. For example, section A1.3.30 on air quality and dust does not match sections 4.7.53-55 of the EIA Scoping Report, and A1.3.32 on traffic management in the CoCP does not include measures detailed in 4.7.60-63 of the EIA Scoping Report.

Spelthorne would wish to see the CoCP improved as the scheme is developed. The CoCP should be secured as a DCO requirement, together with enforceable Construction Environmental Management (CEMP) and Construction Traffic Management Plans (CTMP, or Construction Logistics Plan).

Appendix A8.1 - Air Quality

Paragraph A8.1.4.26 reports on estimated peak construction traffic for an Urban environment, based on Section H, taken from Table A8.2.5 of Appendix 8.2 Traffic and Transport Technical Note. The paragraph states that as an AADT the construction traffic, whilst a total of 3,122 HDVs and 220LDVs, is equivalent to 5 HDVs and 1 LDV movement per day. Reference to Table A8.2.5 indicates that the 5 HDVs and 1 LDV figures are actually the average hour figures under daily traffic demand and not the annual average day, which is given as 4 HDVs and 1 LDV. However, if the total number of HDV movements are spread over 365 days of the year, this generates an average of 8.5 HDV movements per day, so it is unclear whether the figures presented are for two-way movements?

Paragraph A8.1.4.28 outlines that these movements would be distributed across different road links along the 8km section length of Section H, and so the increase in vehicle movements on individual road links are likely to be less than those presented. However, it is noted from Table A8.2.5 that 2,400 of the HDV movements would be related just to the Woodthorpe Road Compound.

Appendix A8.2 - Traffic and Transportation

In Table A8.2.5 Urban Construction traffic movements (Section H) the numbers of vehicle movements are converted to Passenger Car Units (PCUs) for transport modelling of road saturation. PCU factors are given in A8.2.4.3 as 1.5 for LDVs and 2.0 for HDVs. No reference if provided for these PCU factors. It is noted that TfL modelling guidance (TfL, 2010, http://content.tfl.gov.uk/traffic-modelling-guidelines.pdf), for example, assigns a HGV PCU conversion factor of 2.3, increasing PCUs on Woodthorpe Road from 4,800 to 5,520 PCUs.

Table 3.1 (Route and Order Limits, page 3-12) states that there would be 9 construction compounds in Section H, but Table A8.2.5 only details six compounds in the calculation of maximum urban traffic movements. Would there be movements from additional compounds not accounted for in Table A8.2.5?

Table A8.2.5 has an average daily traffic demand of 36 HDVs and 6 LDVs suggesting that Section H construction would take place over a period of about 17 weeks. This indicates that the daily traffic demand from the Woodthorpe Road compound would be an average of 28 HDVs per day. It is unclear why a disproportionate number of HDVs would be operating out of the Woodthorpe Road compound in Section H. This is a suburban residential street with traffic calming measures. Spelthorne has concerns about a loss of amenity, nuisance and annoyance to local residents on Woodthorpe Road due to increased dust, fumes, noise and vibration from this construction traffic over up to 4.5 months.

It is noted that Table A8.3.5 (Estimated number of days that noise could occur at closest receptors) states that noise could be expected for 3 days for construction of a compound and then for 20 days of operation of the site compound. As outlined above, Table A8.2.5 indicates that the Section H vehicle movements would be spread over about 87 working days. If the Woodthorpe Road compound would only be operational for 20 days then the 2,400 HDVs would translate to an average of 104 HDVs per working day, which is very likely to cause aggravation to, and complaints from, local residents.

Appendix A8.3 – Noise and vibration

Spelthorne welcomes the scoping report's general approach for the mitigation of noise and vibration impacts associated with the construction of the Proposed Scheme, with its basis in the guidance of British Standard BS 5228. Spelthorne will need to be involved in discussions regarding adoption of the noise and vibration assessment criteria with the applicant and or their contractors. Noise and vibration impacts could be a significant issue for Spelthorne, particularly where the proposed pipeline corridor passes through Laleham and Ashford in Section H. We would welcome the opportunity for further input where noise or vibration assessments prove there could be potentially significant impacts to our residents, not necessarily highlighted in the scoping consultation. Our concerns are heightened if it is not possible to maintain an alignment close to the Queen Mary Reservoir and it is necessary to deviate away from the existing route to the west of the B377 Ashford Road into the residential area of the Royal Estate.

Within paragraph A8.3.3.29 a threshold of significance for continuous vibration within buildings has been set at a peak particle velocity of 1.0 mm/s. The applicant has not provided a separate night time vibration threshold of significance to ensure that the effects of 24 hour trenchless operations are fully assessed.

Mitigation measures for noise and vibration do not appear to have been explored in as much detail yet as those for dust/ air quality, for example. Sections 4.7.56-58 outlines that Section 61 consents (under the Control of Pollution Act 1974) will be applied for by the contractors, and that noise and vibration will be managed by processes and measures laid out in the CEMP. No detail is provided as to what types of measures would be considered as best practicable means, as has been defined for air quality in paragraphs 4.7.53-54.

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Our Ref: EIA Case 018-025

SURREY

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Ms Marie Shoesmith
Major Casework Directorate
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol BS1 6PN

20 August 2018

Dear Ms Shoesmith,

Response to Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Application by Esso Petroleum Company Limited for an Order Granting Development Consent for the Southampton to London Pipeline Project

PINS Reference: EN070005_000008_270718

1. We write in response to your letter dated 27 July 2018, seeking the views of Surrey County Council on the information to be included in the Environmental Statement (ES) that will be submitted by Esso Petroleum Company Limited as part of the application for a Development Consent Order (DCO) for the proposed construction of a replacement pipeline linking the Fawley oil refinery to the West London terminal storage facility in Houslow. The County Council has reviewed the information presented in the prospective applicant's Environmental Impact Assessment (EIA) scoping report, and has a limited number of comments to make in respect of the that report.

2. The County Council is broadly content with the approach to the EIA process described in the submitted scoping report, in respect of each of the topics covered that are relevant to our areas of responsibility and interest. A number of specific comments have been provided by the County Council's ecological and heritage specialists, which are set out in the following sections of this letter. Comments are also provided with reference to the relationship of the proposed pipeline corridor to a number of permitted mineral sites in Surrey.

Part A: 'Biodiversity' Chapter 7 (pp.7-1 to 7-61) of the Scoping Report

3. The County Council is broadly content with the proposed scope of the assessment in respect of biodiversity as set out in Chapter 7 of the Scoping Report (Volume 1), which appears to be comprehensive. The baseline assessments appear to be relatively accurate, and can be subjected to more rigorous checking at the Preliminary Environmental Information Report (PEIR) stage of the DCO process. The methodologies and data gathering all seem to be following accepted guidance and standards, in terms of general approach and species or habitat specific studies. The only minor correction that we would wish to highlight is that paragraph 7.3.24 (p.7-8) in the Scoping Report refers to 'Sites of Nature Conservation Interest' which should read, 'Sites of Nature Conservation Importance'.

Part B: 'Historic Environment' Chapter 9 (pp.9-1 to 9-28) of the Scoping Report

4. The County Council is broadly content with the proposed scope of the assessment in respect of the historic environment as set out in Chapter 9 of the Scoping Report (Volume 1), which appears to be comprehensive. The document has clearly identified those Historic Environment considerations to be 'scoped in' and 'scoped out' of the EIA (Section 9.6 and Table 9.6, pp.9-26 to 9-28). We would however, recommend that the EIA take account of the following comments.

4.1 Paragraphs 9.2.7 to 9.2.9 (pp.9-2 to 9-3) make reference to the 2012 version of the National Planning Policy Framework (NPPF). It is recommended that reference bye made to the recently published (2018) revision to the NPPF.

4.2 With specific reference to Paragraph 9.2.7 (p.9-2), it would be preferable if the EIA approach took full account of the guidance set out in the NPPF, rather than relying on it only to address gaps in other policy (i.e. the 'National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4)').

4.3 Paragraph 9.3.1 (p.9-4) refers to the EIA covering a "...study area extending 300m from the Order Limits in all directions". The County Council would expect the defined study area to measure 500m from the order limits, as is standard practice for the compilation of desk based assessments within Surrey.

4.4 Paragraph 9.5.10 (p.9-25) makes no reference to the 'Surrey Archaeological Research Framework'. The County Council would expect such reference to be included, and for the Framework to be taken into account in the design of evaluation and mitigation programmes within the county.

Part C: 'Soils & Geology' Chapter 11 (pp.11-1 to 11-33) of the Scoping Report

5. The County Council is broadly content with the proposed scope of the assessment in respect of soils and geology as set out in Chapter 11 of the Scoping Report, which appears to be comprehensive. However, from the perspective of the County Council, in its capacity as Minerals Planning Authority for Surrey, there are a number of permitted mineral sites

that are not accurately reflected in the information set out in paragraphs 11.3.31 to 11.3.43 of the Scoping report. There are a number of references in paragraphs 11.3.31 to 11.3.43 to 'Minerals Preferred Search Areas', and it should be noted that site allocated for mineral working in the adopted Surrey Minerals Plan are correctly referred to as 'Preferred Areas'.

5.1 Home Farm Quarry Extension, Shepperton Road, Shepperton – Referenced in paragraph 11.3.41 (p.11-15) of the Scoping report. This is a permitted mineral working, from which sand and gravel have been extracted, and of which the restoration has been completed, with the affected area of land (and the wider Home Farm and Laleham Nurseries area) now in aftercare.

5.2 Manor Farm, Ashford Road, Laleham and Queen Mary Quarry & Reservoir, Ashford Road, Laleham – Referenced in paragraph 11.3.41 (p.11-15) of the Scoping report. This is a permitted mineral working (45.6 hectares), from which the extraction of sand and gravel has yet to commence. Planning permission (ref: SP/2012/01132) was granted on 23 October 2015 for the extraction of sand and gravel and restoration to landscaped lakes for nature conservation afteruse at Manor Farm, Laleham and provision of a dedicated area on land at Manor Farm adjacent to Buckland School for nature conservation study; processing of the sand and gravel in the existing Queen Mary Quarry (QMQ) processing plant and retention of the processing plant for the duration of operations; erection of a concrete batching plant and an aggregate bagging plant within the existing QMQ aggregate processing and stockpiling areas; installation of a field conveyor for the transportation of mineral and use for the transportation of mineral from Manor Farm to the QMQ processing plant; and construction of a tunnel beneath the Ashford Road to accommodate a conveyor link between Manor Farm and QMQ for the transportation of mineral.

5.3 Homers Farm, London Road, Staines-upon-Thames – Referenced in paragraph 11.3.41 (p.11-15) of the Scoping report. This is a permitted mineral working (10.5 hectares), from which the extraction of sand and gravel has yet to commence. Planning permission (ref: SP/13/00141/SCC) was granted on 12 January 2015 for the extraction of sand and gravel from land at Homers Farm together with the construction and operation of an associated wheelwash, site office, cabin for a generator and car parking, the provision of a new access from Short Lane, and restoration to agriculture involving the importation and deposit of inert materials. Permission was granted subject to 46 conditions and a unilateral legal agreement concerning the routing of lorry vehicles. Sand and gravel extracted from Homers Farm would be transported along the A30 by HGV to an existing processing facility at Hengrove Farm.

Part D: Final Comments

6. We hope that the above comments are of value to the process of defining the scope of the EIA for the proposed scheme, and would welcome the opportunity to engage further with the applicant as the development of the scheme and the associated assessment progresses. Should you require any further information, or wish to seek clarification of any of the comments that we have made please do not hesitate to contact us (Dr Jessica Salder, Principal Environmental Assessment Officer, jessica.salder@surreycc.gov.uk).

Yours sincerely

[redacted]

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The Planning Inspectorate
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23 August 2018

Dear Sir/Madam,

Southampton to London Pipeline Project Scoping Report

Thank you for the opportunity to comment on the Southampton to London Pipeline Project Scoping Report.

Please consider the following comments on behalf of Surrey Heath Borough Council.

1. Para 7.3.17 of Chapter 7 notes that there are three Suitable Alternative Natural Greenspace (SANGS) sites located within the order limits of the replacement pipeline, including the proposed SANG at Southwood Golf Course, in Rushmoor Borough. Two further SANGS in Surrey Heath within the order limits are ignored in this list, namely Windermere SANG and Clewborough SANG. Windlemere SANG will be operational before construction works for the replacement pipeline commences and Clewborough SANG associated with the Clewborough House School Development site. The Scoping report should therefore be amended to include all relevant SANGS.

2. Potential *indirect impacts* to the Thames Basin Heaths SPA arising from Project activities within Windlemere SANG and Clewborough SANG should also be considered in the Scoping Report to inform the HRA and to be consistent with the approach taken with the

three previously identified SANGs. Let the Planning Policy Team know if this is unclear or you do not have access to maps …. Planning.policy@surreyheath.gov.uk

3. We note but disagree with Chapter 7, para 7.4.34 which states that 'Road traffic flows would not exceed those at which a significant effect could arise to important ecological receptors and so have been scoped out'. This is based on conclusions drawn from the air quality assessment provided in Appendix 8, which considers the potential emission sources of air pollutants and dust associated with the Project, including dust generation and emissions associated with construction related activities. The report concludes that emissions from construction related activities in rural and urban areas are not considered to be significant for ecological receptors.

4. The assessment does not consider in detail the potential effects that may arise from *displaced vehicle movements* as a result of traffic management during the construction phase. There are a number of roads which may be directly or indirectly impacted by traffic management during construction that are in close proximity to the Thames Basin Heaths SPA. The Thames Basin Heaths heathland habitat is known to be susceptible to adverse effects of nitrogen deposition and road-generated pollutants deposited within 200m of the road. Prolonged works on Red Road, for example, could lead to changes in traffic flows on the Maultway (B3015) and A322 which both adjoin the Thames Basin Heath SPA. Indeed, in Table 8.2.8, it is noted that for journey times for private motor vehicles in urban areas, the transport effects are potentially significant due to changes resulting from traffic management.

5. Without more clarity on where and for how long changes in traffic flows are likely to occur as a result of traffic management during the construction phase, the Council cannot agree it appropriate to scope out the impact of air quality change attributable to road traffic flows at this stage.

6. Moreover, the possible impact of construction activities *in combination* with changes to traffic flows as a result of traffic management during construction should also be considered as part of this scoping.

7. We note Para 12.4.2 states that the 'Project is unlikely to require the demolition of any residential property'. Examples of residential property types that may be affected during the construction phase are mentioned. The Council considers that the Scoping Report should provide a clear statement that the replacement pipeline and construction phase anticipates that demolition or temporary removal of any habitable dwellings/living accommodation is not envisaged.

The Council welcomes:

- the Preliminary Report to Inform Habitats Regulations Assessment Report in Appendix 4 and the inclusion of consideration for the potential for more complex pathways of impact, including the impacts to Suitable Alternative Natural Green Space (SANGS), which might lead to impacts to the Thames Basin Heaths SPA via displacement of recreational activities from SANGS sites to the SPA;

- the Outline Code of Practice (CoCP) detailed in Appendix 1 of the report and we look forward to its continued development as the Project progresses;

- support for continued engagement in the Southampton to London Pipeline project including with this Council.

I trust that these comments assist. Please let me know if further elaboration is required. I would be obliged to receive responses to the various points raised in due course.

Yours faithfully,

[redacted]

Philip James
Interim Planning Policy and Conservation Manager
Surrey Heath Borough Council.

C.c Sue McCubbin, Garry Carter.

From:	BCTAdmin@thameswater.co.uk
To:	Southampton to London Pipeline Project
Subject:	3rd Party Planning Application - Southampton to London Pipeline Project
Date:	14 August 2018 12:27:45

The Planning Inspectorate
Temple Quay House
Project
Temple Quay
Bristol
BS1 6PN

Our DTS Ref: 58735
Your Ref: Southampton to London Pipeline

14 August 2018

Dear Sir/Madam

Re: Southampton to London, Pipeline Project, Application by, Esso Petroleum Company Limited

Waste Comments
'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission:"A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality."

Water Comments
No water comments
Supplementary Comments

The documents submitted indicate that the developer is intending undertake construction works within exclusion zones of Thames Water assets. The developer is required to contact the Thames Water Developer Services department and state that they have been referred to the Customer Led team by the Development Planning team to discuss the requirements for an asset protection impact study (developer.services@thameswater.co.uk). Their case will be logged and a representative from the Customer Led team will be in contact with them.

More details on the asset protection impact study process can be found in the guidance document "Working Near Our Assets" (available online at https://developers.thameswater.co.uk/developing-a-large-site/planning-your-development/working-near-or-diverting-our-pipes).

Please bear in mind that Thames Water will hold the developer and any relevant contractor/sub-contractor liable for any losses incurred or damage caused to Thames Water assets arising from construction works or subsequent use of the facility. Please use the following reference in all future correspondence: DTS 58735 "

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,

Denham Way,
Rickmansworth,
WD3 9SQ
Tel:020 3577 9998
Email: devcon.team@thameswater.co.uk

This is an automated email, please do not reply to the sender. If you wish to reply to this email, send to
devcon.team@thameswater.co.uk

From:	Carr Richard
To:	Southampton to London Pipeline Project
Cc:	Carr Richard; Farrow Claire (ST); Bloomfield Michael (ST); Ajamufua Paul (ST); Booth Dan; Location Enquiries; Payne Malcolm; Kakouratou Melina; Ranaweera Rohan; Wallace Andrew (London Rail); "Julie Davis"; Crane Anne; Rogers Andrew (ST)
Subject:	FW: Southampton to London Pipeline - EIA Scoping Notification and Consultation
Date:	20 August 2018 10:35:20
Attachments:	Southampton to London Pipeline Statutory Consultee Letter.doc

Thank you for consulting Transport for London (TfL). As the strategic transport authority for London, TfL amongst other things provides London Underground and Overground rail services, manages the Transport for London Road Network (TLRN) and provides bus services within the London borough of Hounslow where the West London Oil Terminal is located. We would want to ensure that any potential impacts on surface or sub surface rail infrastructure including the Piccadilly Line and Elizabeth Line (Crossrail), operation of the TLRN or its junctions and any delays to bus services caused by road closures or diversions as a result of pipeline replacement works are minimised. Mitigation may need to be provided for any negative impacts. Potential impacts and proposed measures should be discussed as part of the EIA preparation and detailed in the Environmental Statement that is produced to support the application(s).

In the first instance please contact TfL Spatial Planning SpatialPlanning@tfl.gov.uk

Best wishes
Richard Carr

Richard Carr I Principal Planner (Spatial Planning)
TfL Planning, Transport for London
E: richardcarr@tfl.gov.uk
A: 9th Floor, 5 Endeavour Square, E20, Westfield Avenue, E20 1JN

I work part time and so there may be a short delay in responding to emails

For more information regarding the TfL Borough Planning team, including TfL's *Transport Assessment Best Practice Guidance*, and pre-application advice please visit https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance

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From: Southampton to London Pipeline Project [mailto:SouthamptontoLondonPipeline@pins.gsi.gov.uk]
Sent: 27 July 2018 10:13
Subject: Southampton to London Pipeline - EIA Scoping Notification and Consultation

Dear Sir/ Madam

Please see the attached correspondence on the proposed Southampton to London Pipeline.

Please note the deadline for the consultation is 24 August 2018, and is a statutory deadline that cannot be extended.

Kind Regards

Michael Breslaw

EIA and Land Rights Advisor
Major Applications & Plans
Major Casework Directorate

The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol, BS1 6PN
Direct line: 0303 444 5092
Helpline: 0303 444 5000
Email: Michael.Breslaw@pins.gsi.gov.uk

Web: infrastructure.planninginspectorate.gov.uk (National Infrastructure Planning)
Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Twitter: @PINSgov

This communication does not constitute legal advice.
Please view our Information Charter before sending information to the Planning Inspectorate.

Waverley Borough Council
Council Offices, The Burys,
Godalming, Surrey
GU7 1HR
www.waverley.gov.uk

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

Sent via email:
southamptontolondonpipeline@pins.gov.uk

Gayle Wootton
Team Leader (Local Plans and Planning Policy)
Planning Services
E-mail: gayle.wootton@waverley.gov.uk
Direct line: 01483 523417
Calls may be recorded for training or monitoring
Date: 22nd August 2018

Dear Sir/Madam,

Southampton to London Pipeline - Consultation on the Scoping Opinion

Thank you for your letter dated 27th July requested our input to the Scoping Opinion for the Environmental Impact Assessment (EIA) relating to the Proposed Development. Having review the Scoping Report prepared by the Applicants, the Council considers that the EIA will include the necessary assessment on issues relating to Waverley, primarily traffic congestion and other impacts during the construction phase, and landscape impacts affecting the setting of the Surrey Hills AONB. These issues were previously raised during the route selection phase and the Council is pleased to note that corridor options M& Q have not been progressed.

Yours faithfully,

Graham Parrott
Planning Policy Manager

From:	Karen Hartley
To:	Breslaw, Michael
Cc:	Sheridan Mockford
Subject:	Southampton to London Pipeline - response to Consultation
Date:	09 August 2018 11:10:46

Dear Mr Breslaw

Further to your e-mail dated 27th July, West End Parish Council wish to advise you that following a discussion at this week's Planning & Highways Committee meeting, they will not be responding to this Consultation.

Kind regards

Karen

Karen Hartley
Admin Officer

West End Parish Council
Parish Centre, Chapel Road, West End, Southampton, SO30 3FE.

Tel: 023 8046 2371 Fax: 023 8047 4147 Web: www.westend-pc.gov.uk

Please note that I only work Tuesday and Thursdays. If you need an urgent response please contact either Sheridan Mockford, Laura Cooke or Allie Burton-Doe on 02380 462371.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit http://www.symanteccloud.com

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WOKING
BOROUGH COUNCIL

Civic Offices
Gloucester Square
Woking
Surrey GU21 6YL

Telephone (01483) 755855
Facsimile (01483) 768746
DX 2931 WOKING
Email wokbc@woking.gov.uk
Website www.woking.gov.uk

Marie Shoesmith
Major Casework Directorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

23 August 2018

Dear Marie Shoesmith,

Your ref:	EN070005_000008_27078 **Our ref:** PLAN/2018/0844
Location:	Southampton To London Pipeline
Proposal:	Consultation by The Planning Inspectorate in respect of an Environmental Impact Assessment Scoping Opinion Report submitted by Esso Petroleum Company for the Southampton to London Pipeline Project.

Thank you for your consultation on the above scoping opinion relating to the Southampton to London Pipeline Project. Officers have considered the proposal and available information and have no specific comments on the scoping information. It would be expected that any future Environmental Statement or planning application would be supported by the relevant technical information on Listed Buildings, Conservation Areas, Tree Preservation Orders etc so the environmental effects of the proposal can be assessed. Woking Borough Council would request to be kept upto date on the progress of the Southampton to London Pipeline Project.

Yours sincerely,

[redacted]Brooke Bougnague
Planning Officer
For further information please contact Brooke Bougnague on 01483 74 3444 (Direct Line) or Brooke.Bougnague@woking.gov.uk