

From: [Turner, Marc](#)
To: [Southampton to London Pipeline Project](#)
Cc: [Sussex, Des](#); [Steven, Graham](#); [McConnell, Ian](#)
Subject: Natural England Formal Response to NSIP
Date: 26 July 2019 17:08:02
Attachments: [SLP NSIP Written Reps NE 260719.pdf](#)

Dear Planning Inspectorate,

Please find attached Natural England's comments on the above NSIP. Natural England have no serious concerns with this application and will not be objecting to it. The majority of background information pertaining to our position will be enclosed within a Statement of Common Ground we are working up with Esso and Jacobs. The two matters we would like to bottom out, ideally before the examination and conclude through the Statement of Common Ground process are;

- Further information on the Environmental Investment Programme. Not a reason for us to object, but we want to continue to work with Esso on this in advance of the Examination.
- Natural England would like to further explore one point raised in the documentation about the 15m buffer around woodland. This is more to discuss a methodology in these constrained areas. I am hopeful this can be satisfied with a conversation between ourselves, Esso and the Forestry Commission.

Kind Regards

Marc

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PLEASE NOTE, I do not work Thursday after midday

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We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing

Natural England offers two chargeable services – The Discretionary Advice Service ([DAS](#)) provides

pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service ([PSS](#)) provides advice for protected species mitigation licence applications.

These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

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Date: 27 July 2018



Planning Inspectorate

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BY EMAIL ONLY

T 0300 060 3900

Dear Planning Inspectorate

NSIP Reference Name / Code: Southampton to London Pipeline Project by Esso Petroleum Company Limited

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Written Representation

Natural England are pleased with the progress and engagement Esso have made with us over the past years on this project. Natural England have no objections upon this scheme. Pending that the measures proposed within the Environmental Statement and Habitats Regulations Assessment to alleviate the threat of likely significant effect and harm, are secured through this DCO process.

We have two points we continue to explore through the Statement of Common Ground process. More information on those are detailed below in Section 3.

We have no comment to make in terms of the applicant's evidence, assessment or analysis work. It is our opinion that it is comprehensive and sufficient for judgements to be made on this application. We feel that all relevant policy such as the National Policy Statement, National planning policy and guidance on protected sites and species and European Commission guidance has been followed as required for Natural England to provide this advice to the Planning Inspectorate.

PART 1 INTRODUCTION

1.1. Purpose and structure of these representations

- 1.1.1. These Written Representations are submitted in pursuance of rule 10(1) of the Infrastructure Planning (Examination Procedure) Rules 2010 ('ExPR') in relation to an application under the Planning Act 2008 for a Development Consent Order ('DCO') for the Southampton to London Pipeline Project ('the Project') submitted by Esso ('the Applicant') to the Secretary of State.

2. CONSERVATION DESIGNATIONS, FEATURES AND INTERESTS THAT COULD BE AFFECTED BY THE PROPOSED PROJECT

Natural England are satisfied that the numerous designations listed in both the Applicants Environment Statement and Habitats Regulations Assessment, submitted with this application, represent an accurate list of European, National and Local biodiversity and landscape designations. We do not feel it necessary to reproduce them all at this juncture.

3. NATURAL ENGLAND'S ADVICE

3.1. The principal matters left to agree

3.1.1. Natural England identified the following main issues in this Representation:

- a. Detail relating to the Environmental Investment Programme
- b. Methodology relating to working within 15m of woodland

3.2. a. Detail relating to the Environmental Investment Programme

3.2.1. Natural England have been in discussion with the applicant for some time on how this application will provide beneficial improvements for the environment. This is not categorised as avoidance and mitigation as the scheme is not reliant on it coming forward. However is more in keeping with current Government aspirations towards biodiversity net gain. We know the applicant is committed to providing this, we are just waiting for further information, before formally signing the measures off. As discussed above we would expect this should easily be agreed in advance of the Examination, through the Statement of Common Ground, and shouldn't require our attendance for discussion.

3.3. b. Methodology relating to working within 15m of woodland

3.3.1. The applicant has made us aware in the documentation relating to this application that they are avoiding all Ancient Woodland. Due to the length of the scheme, they are going to be running in close proximity to other areas of woodland. At the minute there is the proposal in a few circumstances to run within 15 metres of that woodland potentially encroaching on root protection zones. Natural England would appreciate a further conversation with the applicant and Forestry Commission on this matter and what methodology would be used on those few occasions. We need further certainty that veteran or key trees will not be significantly harmed by this application. As discussed above we would expect this should easily be agreed in advance of the Examination, through the Statement of Common Ground, and shouldn't require our attendance for discussion.

3.4. Conclusions

3.4.1. Natural England are in agreement that this application should be able to continue without harm to any key designations or species. All draft letters of no impediment for protected species have been issued and form part of the applicants evidence base. We would value further discussion on the two points above. We hope to have them finalised through the Statement of Common Ground, so that Natural England have no outstanding matters by commencement of the Examination.