



Your reference EN070005

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Date 24 October 2019

Sent via email only

Dear Sir or Madam,

Application by Esso Petroleum Company, Limited for an Order Granting Development Consent for the Southampton to London Pipeline Project

We write in relation to the examination timetable set out in the Rule 8 letter dated 16th October 2019.

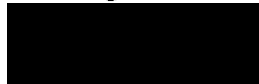
In response to Deadline 1, we confirm that: -

- We wish to speak at a Compulsory Acquisition Hearing; and
- We wish to speak at an Open Floor Hearing.

In relation to Accompanied Site Inspections (ASI) we invite you to carry out an ASI at Southwood Country Park in Farnborough. The reason for this is that when surveyed for the EIA large areas of the site was managed as a golf course, with the grassland closely mown. The EIA identified this as amenity grassland and therefore of limited value. The golf course use ended in October 2018. Now that the site has been left to rewild for a season the habitats across Southwood Country Park have matured into species rich acid grassland. Rushmoor Borough Council feels that the siting of the pipeline through the centre of this large strategic SANG will create an intrusion on the landscape views, impact on the peace and tranquillity and deter visitors from using the site. We feel that the Inspectors need to walk the route to fully appreciate the impact on the entire park from the proposed works.

If the Examining Authority is not minded to carry out an ASI at Southwood Country Park then we would arrange access to those parts of the site which are not currently open to the public and will peg out the route of the pipeline to assist your inspection.

Finally, we enclose a copy of the Local Impact Report prepared on behalf of Rushmoor Borough Council.



Chief Executive Paul Shackley

• Executive Director Ian Harrison

• Executive Director Karen Edwards

Yours faithfully



LS Luisa Stuart
Planning & Regulatory Solicitor
On behalf of Rushmoor Borough Council

Local Impact Report

**Application by ESSO Petroleum Company Ltd
for an Order Granting Development Consent
for the Southampton to London Pipeline
Project**

Application Reference EN070005

Interested Party Reference 20022787

Internal Reference 19/00432/PINS

Terms of reference

Acronym/Abbreviation Meaning/ Description

CEMP	Construction Environment Management Plan
CP	Cathodic Protection
DCLG	Department of Communities and Local Government
DCO	Development Control Order
EA	Environment Agency
EIA	Environmental Impact Assessment
LIR	Local Impact Report
NERC Act 2006	Natural Environment and Rural Communities Act 2006
NPPF	National Planning Policy Framework 2019
NPS EN-4	National Policy Statement for gas supply infrastructure and gas and oil pipelines
PIGS	Pipeline Inspection Gauges
PINS	Planning Inspectorate
PT	Pressure Transducer
RBC	Rushmoor Borough Council
SANGS	Suitable Alternative Natural Greenspaces
SINC	Site of Interest for Nature Conservation
SLP	Southampton to London Pipeline
SoCG	Statement of Common Ground
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
TPO	Tree Protection Order
WFD	Water Framework Directive

Executive Summary

Rushmoor Borough will be heavily impacted by the proposed Southampton to London Pipeline. The route stretches for 4.4 miles intersecting the Farnborough area. Impact is largely focused within the open spaces, sports facilities and along the designated green corridors of the borough, with the order limits stretching over 26.67 acres of open spaces and intersecting ten green corridors.

It is Rushmoor Borough Council's view that the Information submitted for the Habitats Regulations Assessment does not provide a rigorous assessment of the impacts of the project on the Thames Basin Heaths Special Protection Area. We are concerned that the habitat loss within the SPA and the impact to multiple SANGS across the route will cause a significant impact on the integrity of the site loss of nesting sites and recreational pressure.

Eelmoor Marsh Site of Special Scientific interest (SSSI) and five Sites of Interest for Nature Conservation (SINCs) are adjacent to or within the order limits. Habitat will be lost in two of the SINCs within Southwood Country Park with the remaining SINCs and SSSI under threat of impact due to contaminated runoff or changes in hydrology. In addition, there is a threat that Blackwater Valley, Frimley Bridge could be contaminated if the landfill is disturbed.

There are two natural open spaces to be impacted directly within the borough. Southwood Country Park is a SANG containing a complex of acid grassland, wet woodland and floodplain habitats such as rush pasture and grazing marsh. The pipeline will run through the middle of the park and the council is concerned that the peace and tranquillity, landscape views, wildlife value and access will be compromised, and people deterred from using the site for substantial period(s). As Southwood Country Park is a Suitable Alternative Natural Greenspace, we are concerned that the visitors may be diverted onto the SPA. The Council shares Environment Agency's concern about the risk created by compromising the integrity of the bund to the Flood Alleviation Area leading to the potential of downstream flooding.

Queen Elizabeth Park is a 23.15-acre 50-year-old broadleaved woodland. It is an important local resource for the residents within the visitor catchment and an important habitat stepping stone for fauna using the South Western Main Railway Corridor. 5.8 acres of the woodland will be lost due to the pipeline with a third of this being unable to be recreated due to planting limitations within the pipeline.

Four sporting facilities are to be impacted Southwood Playing Fields, Cove Cricket Club and Farnborough Hill Football and Bowls Club. There is the risk that all these facilities could lose access to their sites during construction with the long-term management of the football fields possibly being compromised.

Ten landscape scale green corridors, designated within the Local Plan, will be crossed within the scheme. Although impact within the three main transport routes and Basingstoke Canal SSSI are likely to be neutral due to directional drilling, significant tree loss is planned along the railway corridors, significant trees are will need to be protected in Old Ively Road and Ively Road and the Cove brook corridor is being impacted both within the Country Park and the Cove Brook Greenways. There is a threat that the River Blackwater could be polluted if the landfill is disturbed.

One Conservation Area is being crossed by the route, however it is thought that the impacts will be temporary with the final impact being neutral.

There are several hedgerows and TPO trees along the route that will need to be protected, some of which are not mapped by the applicant.

Rushmoor Borough Council also feel that the impact on traffic due to the closure of Cove Road and Ship Lane should be considered and mitigated. Cove Road is a very busy East West link through the borough and will require a Transport plan to ensure no major disruption.

Currently there is no assessment of impacts the decommissioning of either the existing pipeline or the new pipeline in the future. To appreciate and mitigate the full impact of the project, especially to ecology the council feel the impacts should be appraised.

Despite the significant impacts above little mitigation or compensation has been agreed. The Council and ESSO have been negotiating for a year, however the only solid commitment for the impact caused to the borough is a new playground for Queen Elizabeth Park. We hope we will be able to work with the applicant through the Statement of common Ground process to agree appropriate measures.

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1. Introduction

- 1.0.1 This Local Impact Report (LIR) has been prepared by Rushmoor Borough Council (RBC), with input from officers specialising in Planning Policy, Development Management, Council Property and Landholdings, Open Spaces, Ecology and Legal Services. The LIR forms part of Rushmoor Borough Council's response to ESSO's proposals for the replacement of the Southampton to London Pipeline (SLP).
- 1.0.2 Rushmoor Borough Council is an "interested party" under the Planning Act 2008 with respect to the project, as a landowner of open spaces and sports facilities which will be impacted within Farnborough, and as a planning authority in relation to the proposed works. Additionally, Rushmoor Borough Council has other statutory responsibilities including a Duty to Conserve Biodiversity under the Natural Environment and Rural Communities Act 2006 (NERC) ss40. The council will be responsible for discharging requirements within their administrative boundary and will become one of the enforcement authorities for the scheme.
- 1.0.3 The purpose of a LIR is defined in section 60(3) of the Planning Act 2008 (as amended) as '*a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)*'. In preparing this report, Rushmoor Borough Council has considered the purpose of LIR detailed within *DCLG's Guidance for the examination of applications for development consent* and *PINS Advice Note One, Local Impact Reports*. This document therefore, sets out details of the likely impacts of the proposed development on the local authorities' administrative areas.
- 1.0.4 The council has endeavoured to cover all topics that we consider relevant to the impact of the proposed development, using our local knowledge and evidence on local issues in conformity with PINS Advice Note One. Additionally, as recommended by guidance, this LIR includes a statement of positive, neutral and negative local impacts.
- 1.0.5 The report contains a section on the existing characteristics of the sites on which the Scheme impacts. Where possible the report identifies the impacts of the proposals on the ecology and the hydrological processes associated with the natural and semi-natural habitats. Where relevant the LIR also assesses the community value of the sites and the impact to public use by the scheme. Finally, an assessment of the compliance of the Scheme against the local plan policies has also been undertaken.
- 1.0.6 The site-based sections contain an assessment of positive, neutral and negative impacts, during construction operation and decommissioning of the Scheme. These sections also highlight areas where the council considers there are further opportunities to provide enhancement, which the Scheme does not thus far fully realise. Where negative impacts are identified mitigation and compensation measures are recommended to remedy the impact as far as possible and ideally provide biodiversity gain.

2. Summary of the proposed development

- 2.0.1 ESSO Petroleum Company have submitted an application to the Secretary of State for a Development Consent Order (DCO) to replace 90km of ESSO Petroleum Company Limited's 105km aviation fuel pipeline that runs from Fawley Refinery near Southampton to ESSO's West London Terminal Storage Facility in Hounslow. The proposed DCO will authorise works to lay 97km of high-pressure fuel pipeline, with the route running adjacent to the existing pipeline where possible, but with deviations from the current route where space is limited.
- 2.0.2 Part of the proposed development falls within RBC's administrative boundary. The London to Southampton Pipeline project comprises of:
- 97km of new steel pipeline, approximately 300mm in diameter;
 - A new pigging station at Boorley Green to allow the entry and exit points for Pipeline Inspection Gauges (PIGs);
 - 14 remotely operated in-line valves along the pipeline to allow isolation of sections of Pipeline for maintenance or in case of emergency;
 - A Pressure Transducer (PT) to monitor pressure;
 - 6 new above ground Cathodic Protection (CP) transformer rectifier cabinets to supply power to the existing CP system;
 - Pipeline markers along the route at all roadside crossings and boundaries as well as new red and black colour coded flight marker posts to track the pipeline route when inspected by helicopter; and
 - Modifications at the pigging station at the ESSO west London Storage Facility including installation of a new PIG receiver, and connection to the replacement pipeline.
- 2.0.3 Temporary infrastructure will be required to install the pipeline. This would include:
- 6 logistics hubs at strategic locations to store and distribute the pipes and provide site offices;
 - Construction compounds close to the route to be used to store equipment, provide staff; facilities and lay down pieces of pipe and equipment;
 - Access tracks to link the pipeline installation areas with the local road network.

3. Consenting Regime – Nationally Significant Infrastructure Project

- 3.0.1 The Southampton to London Pipeline is a National Infrastructure Project under the Planning Act 2008 Nationally Significant Infrastructure Projects. The inspectorate will also be guided by NPS EN-1 Overarching National Policy Statement for Energy and NPS EN- 4 National Policy Statement for gas supply infrastructure and gas and oil pipelines (EN-4). As an NSIP the applicants require planning permission in the form of a DCO granted under the Planning Act 2008.

- 3.0.2 ESSO submitted an application under Section 37 of the Planning Act 2008 for PINS to obtain a DCO for the Southampton to London Pipeline on 14th May 2019. The application was accepted by PINS on 11th June 2019. PINS, as the examining body for NSIP, will assess the project and make recommendations to the Secretary of State. The Secretary of State will then determine the application, taking into consideration whether it is in conformity with NPS EN-4 and applying the relevant statutory tests in the Planning Act 2008 and related regulations.

3.1 Assessment of the Southampton to London Pipeline

- 3.1.1 The SLP will be determined in accordance with the Planning Act 2008, NPS EN-4, and other relevant international and national policies such as the National Planning Policy Framework 2019 (NPPF) and legislation for protected nature conservation sites and species.
- 3.1.2 The guidance contained within NPS EN-1 Overarching National Policy Statement (EN-1) and EN-4 will form the primary criteria which will be used to determine the application and any ancillary or associated works. RBC accepts the principle that the development of a NSIP is acceptable as the replacement pipeline will ensure an aviation fuel supply to Gatwick and Heathrow Airport in the future.

4. Policy Context

4.1 National Planning Policy Framework 2019 / Planning Practice Guidance

- 4.1.1 The NPPF and the associated guidance sets out the Government's policies and how they are to be implemented. No specific policies relating to NSIP are contained within the NPPF; however, the weight to be given to Government policy is detailed within paragraph 5 of the NPPF 2019.

The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy and may be a material consideration in preparing plans and making decisions on planning applications.

- 4.1.2 Despite no specific policies for NSIP within the NPPF, it is stated that Local Planning Authorities should work with other authorities and providers to take account of the need for strategic infrastructure within their administrative boundaries. Therefore, the NPPF and any guidance will be given consideration when determining NSIP applications.
- 4.1.3 RBC concurs with the Local Planning Policies which have been identified for consideration within the Planning Statement (7.1) Table 6.1. In respect of RBC, the development plan comprises Hampshire Minerals and Waste Plan 2013 and Rushmoor Borough Council Local Plan 2014 -2032, adopted in February 2019, and a single saved policy of the South East Plan (NRM 6).

4.2 Relevant Local Plan Policies

- 4.2.1 **IN1 – Infrastructure and Community Facilities** - provides a criteria-based policy that seeks to ensure that there will be no loss or reduction in capacity of existing infrastructure, including community facilities. Infrastructure includes community facilities such as sports pitches and facilities. This development will lead to at least the temporary loss of two football pitches, a cricket club and a bowling club.
- 4.2.2 **HE1 – Heritage** -The route travels through the grounds of a listed building (Farnborough Hill School). However, our assessment is that the proposed works are unlikely to impact on the building and the retention of the tree cover ensures its setting.
- 4.2.3 **HE3 – Development within or adjoining a Conservation Area** - The route travels through Farnborough Hill Conservation Area which will cause a temporary impact to the integrity of the historic character. However, as the pipeline is going to be installed underground, in the long term the development is unlikely to cause an impact.
- 4.2.4 **DE6 – Open Space, Sport and Recreation** - Multiple open spaces will be impacted by the pipeline route including Southwood Country Park, Southwood Playing Fields, Cove Cricket Club, Queen Elizabeth Country Park, Prospect Road Allotments, Farnborough Hill Recreation Ground and Ship Lane Cemetery.
- 4.2.5 **DE7 – Playing Fields and Ancillary Facilities** - The route will cross a number of playing fields including Farnborough Hill Playing Fields, Cove Cricket Club and Southwood Playing Fields.
- 4.2.6 **DE10 – Pollution** - There is a risk of polluting of international, national and local designated sites through polluted runoff from the adjacent construction works.
- 4.2.7 **PC2 – Strategic Employment Site & PC5 – Cody Technology Park** - The route travels through a strategic employment site at Cody Technology Park. However, as the pipeline follows an existing pathway there is unlikely to be a long-term significant impact on this site.
- 4.2.8 **NE1 – Thames Basin Heaths Special Protection Area & Policy NRM6 (Thames Basin Heaths Special Protection Area) South East Plan** - This policy remains part of the development plan – The route intersects the Thames Basin Heaths before it enters Rushmoor. It then runs adjacent to Eelmoor Marshes in the western most part of the route within the borough. Further SPA habitat is impacted within the Surrey Heath area,
- 4.2.9 **NE2 – Green Infrastructure** – The proposed development will run through many of the open spaces and green corridors within and surrounding Farnborough. Farnborough Hill Convent is defined as an important Open Area
- 4.2.10 **NE3 – Trees and Landscaping** -There will be significant tree loss within open spaces such as Southwood Country Park and Queen Elizabeth Country Park and along the railway lines. The proposed route runs close to the root zones of significant trees within the green corridors.
- 4.2.11 **NE4 – Biodiversity** The proposed route runs through natural habitats, green corridors and open spaces which are likely to support protected flora and fauna species. NE4 also requires development to show a biodiversity gain.

- 4.2.12 **NE5 – Countryside** Sections of the route travel through areas defined as countryside in the Local Plan.

5. Relevant Development Proposals

- 5.0.1 A number of planning applications were scoped in within the Environmental Impact Assessment (EIA) Scoping Report for possible cumulative impacts in combination with the Southampton to London Pipeline. RBC agrees with the applicant that none of these developments are likely to have a significant impact in-combination with the pipeline.

6. Pre-Application Process

- 6.0.1 RBC has engaged with ESSO throughout the pre-application process. The council has responded in detail to the preferred route and detailed design consultation and participated in several meetings and a site visit. RBC has endeavoured to work constructively with ESSO to try to minimise impacts and to ensure the scheme benefits the populace and wildlife within the borough. Since the examination process commenced RBC has been working with ESSO on a Statement of Common Ground (SoCG). The first draft of the SoCG will be submitted to the Inspector on the 14th November 2019. Both parties have communicated well throughout the process with changes being made to the route and the development design to reduce impacts on the natural environment. Some issues still require resolution, and these will be further explored within the Council's Written Representations.

6.1 Preferred Corridor Consultation 19 March and 30 April 2018

- 6.1.1 In March 2018 ESSO consulted on six 200m wide corridors for the replacement pipeline, three to the north of ESSO's Alton pumping Station and three to the South. Corridors G and J were selected as the preferred option as these routes were as close as possible to the existing route. As the original pipeline was delivered in 1972, new development means that the existing route could not be followed in its entirety.

6.2 Preferred Route Consultation 6 September and 19 October 2018

- 6.2.1 In October 2018 ESSO consulted on the preferred route with order limits of between 20m and 30m. A number of sub-options were proposed along the route. The route was divided into eight sections with sections D and E falling into RBC administrative boundaries.
- 6.2.2 Within the design refinements process Option E1a was selected within Southwood Country Park, in part due to RBC concerns regarding E1b's proximity to Cove Brook.
- 6.2.3 Neither of the sub-option E2a and E2b from the preferred corridor route were selected within the design refinements process but an alternative route was selected which meant that a compound is placed close to Cove Brook adjacent to West Heath Road within Cove Brook Greenways.
- 6.2.4 Sub-option E3a was selected within the design refinement process as it followed the existing route, causing the least disruption.

6.2.5 Sub-option E4a was selected as it was the option the majority of landowners preferred and will cause the least disruption to Henry Tyndale School. The applicant acknowledged that there were environmental concerns with this option due to the disturbance of the historic landfill present within the area and its proximity to the River Blackwater and Blackwater Valley Frimley Bridge SINC.

6.3 Design Refinements Consultation 21 January 2019 and 19 February 2019

6.3.1 In January 2019 ESSO published their design refinements. Within this consultation, the final route was proposed. The route included the alternative route for E2a and E2b. As this route had not previously been consulted on, the impact on Cove Brook was not noted by the RBC ecologist. It was suggested within the design that open trenching could occur within the historic landfill site to the north of the borough.

6.4 Statement of Common Ground

6.4.1 As noted above, the extent of agreement and the areas still to be agreed is being negotiated within the SoCG. RBC and ESSO have met on one occasion and are due to meet again in early November. RBC has responded to the applicant's first draft, and it is proposed that the second draft of the SoCG will be submitted to the inspector on the 14th November 2019. RBC has endeavoured to highlight where further information, mitigation and compensation are required, to endeavour that the adverse impacts on the population and biodiversity within Farnborough can be alleviated as much as possible. RBC will continue to work with ESSO throughout the examination process to try to resolve the list of outstanding matters.

6.5 Assessment of Intra and Inter Project Cumulative Effects

6.5.1 RBC and ESSO have agreed on a list of major projects within the vicinity of the pipeline. The applicant has provided an assessment of Intra project cumulative impact and cumulative impacts with other projects within Chapter 15. Due to the pipeline route largely running through open spaces and along roads, RBC agrees there is unlikely to be a cumulative impact with the projects within the Local Plan directly.

7. Site Description and Surroundings

7.0.1 Within the administrative boundaries of RBC, the land uses within and adjacent to the order limits comprise predominantly dense urban development, green corridors, natural, semi-natural habitat and amenity open spaces.

7.1 The Thames Basin Heaths Special Protection Area (SPA)

7.1.1 The Thames Basin Heaths SPA is a network of heathland sites that cover 8,274ha of Berkshire Hampshire and Surrey, across 13 Sites of Special Scientific Interest (SSSI), within nine Local Authority areas. The Local Authorities that impact on the Thames Basin Heaths SPA have worked in partnership to provide mitigation for in-combination recreational impacts, brought about by increases in housing. The mitigation requires Suitable Alternative Natural Green Spaces (SANGs) to be provided at 8ha/1000 people, with set up and 80-year management being funded by developer contributions. Payments are also required to fund

the Sustainable Access Management and Monitoring Strategy (SAMMS) which provides a team of wardens to educate the users of the SPA, regarding its ecological sensitivities and responsible behaviour

- 7.1.2 Although the pipeline will not be having a direct impact on the SPA within our boundaries, as a planning authority it is our duty to ensure no impact on the heathlands from any plans and projects.
- 7.1.3 Within the order limits there is 47.6ha of supporting habitat for SPA birds. Although some habitat is being preserved due to trenchless methods, there appears to be no information regarding the area of SPA supporting habitat that will be lost due to the project.

7.2 Basingstoke Canal Site of Special Scientific Interest (SSSI) and the A323 Green Corridor

- 7.2.1 The proposed pipeline route enters the borough by directional drilling under the A323, a major access route connecting Fleet to the A325. The A325 provides good links to Farnborough, Aldershot and Farnham, as well as to neighbouring planning authorities. The directional drill will continue under the Basingstoke Canal (SSSI) before surfacing on Old Ively Road. The Basingstoke Canal SSSI is designated for its dragonfly and damselfly populations and its aquatic and marginal vegetation.

7.3 Old Ively Road Green Corridor

- 7.3.1 Old Ively Road forms a green corridor linking the Basingstoke Canal and the Thames Basin Heaths to Southwood Woodlands and Southwood Country Park SANGs and associated Sites of Interest for Nature Conservation (SINC's). Along Old Ively Road there are several ecological designations, with Eelmoor Marshes SSSI to the south of the road and Ball Hill SINC to the north.
- 7.3.2 Eelmoor Marshes is part of the Thames Basin Heaths Special Protection Area (SPA). The SSSI is of ecological importance for its acid bog, heathland and invertebrate communities, as well as supporting significant numbers of SPA ground nesting birds. It is an important site within Rushmoor as it contains the headwaters/ the source of Cove Brook. From here the brook runs through the airport and out into Southwood Country Park. Ball Hill SINC has been designated at a County level for its heathland and acidic grassland. Both Eelmoor Marsh SSSI and Ball Hill SINC provide important stepping stones to enable biodiversity to move along the green corridor and colonise the new Country Park.
- 7.3.3 Old Ively road is lined with mature trees and contains a cycleway. Due to the significant ecological value of the trees and the amenity value of the cycleway, ESSO have proposed that the pipeline is laid within Old Ively Road.

7.4 A327 Ively Road Green Corridor

- 7.4.1 From Old Ively Road the pipeline then runs into Ively Road before entering Southwood Country Park SANG. Ively Road has been identified as a green corridor running through the borough as well as being a key route into Farnborough Town Centre and Farnborough airport from Junction 4a of the M3 and the North of Fleet.

7.5 Southwood Country Park SANG

- 7.5.1 Southwood Country Park was formally a golf course which contained the previous ESSO pipeline. In early 2018 it was agreed that the golf course should be closed, and the site transformed into a Suitable Alternative Natural Greenspace (SANG). This would provide alternative natural space for residents and will become an important recreational resource. It serves the purposes of deflecting people from recreating in the SPA, thereby avoiding adverse effects on the integrity of the SPA from increased recreational pressure from a growing local population. Further, the Country Park will be managed for biodiversity and already provides an important biodiversity resource for the Borough. The closure of the golf course came earlier than expected as the company running the golf course went into receivership in October 2018.
- 7.5.2 Since closure, the pumps that drained the site have been deactivated and the site has been allowed to re-wild. Although within the west much of the habitat has regenerated to rough grassland, the habitat within the eastern parcel is richer and more biodiverse. Acidic grassland containing tender grasses has formed, with large beds of heath bedstraw colonising the site. Flora species associated with wetland and acid grassland are present and orchid species have been recorded throughout the summer months. This quick regeneration to acid grassland is thought to be due to the proximity of the seed bank held within the SINCS associated with Cove Brook and because the golf course did not use fertiliser when it was operational. The Country Park has a large population of slow worms' common lizards and palmate newts, with signs that badgers, bats and otter foraging within the site. Within a terrestrial invertebrate survey, 2019t two nationally rare, two nationally scarce and one near threatened invertebrate species were found within the Country Park.
- 7.5.3 The Ively stream runs through the western parcel, with the headwaters/source, of the stream, situated largely within Southwood Woodlands, extending into the Country Park along the northern boundary. Cove Brook and Marrow Brook run through the eastern parcel. Cove Brook is largely abutted by floodplain habitats, rush pasture and wet woodland. The brook and its surrounding habitats are designated as SINCS at a County level and have been managed for nature conservation from the early 1990's
- 7.5.4 Cove Brook and its catchment have been assessed as "bad" under the Water Framework Directive (WFD). This is thought to be due to the heavy engineering and canalisation that has occurred around the headwaters and the upper reaches of the Cove catchment. Alongside the re-wilding of the area, RBC and the EA are working on a jointly funded strategic project, known as the Cove Brook and Southwood Floodplain Enhancement Project. This aims to connect the Ively stream headwaters to the main brook, remove the culverts and heavy engineering from the waterways and create and re-establish meanders, backwaters and rills within the streams. The associated floodplain will be allowed to regenerate, with scrapes and ponds created and existing drains and ditches naturalised. This project is likely to be delivered within 2020 and will be completed before the ESSO pipeline construction period commences.
- 7.5.5 There are three SINCS associated with the Country Park. Southwood Golf Course West SINC is a stretch of wet woodland and floodplain grazing marsh adjacent to the Ively stream. This

area was identified within surveys undertaken to establish an ecological baseline for Southwood Country Park SANG and designated in 2017. Cove Valley Southern Grasslands SINC and Cove Brook SINC are situated adjacent to Cove Brook forming a wide habitat complex containing floodplain grazing marsh, rush and Molina pasture and wet woodland along the riparian corridor. Within the flora survey in 2017, additional areas were identified as being of County significance for their flora. The Cove Valley Southern Grassland SINC was extended to include much of the habitat within the Southern half of the eastern parcel of the Country Park. The lack of disturbance within the floodplain habitats over several decades has provided a mature seedbank, which will be used to enrich the areas with poorer ecology, as part of the future management of the Country Park.

- 7.5.6 On exiting the Country Park, the route runs along the boundary of Cove Playing Fields, with the haul road bisecting Cove Cricket Club car park, before again entering the Country Park, running through the EA Flood Storage Area. The playing fields and cricket club are important recreational assets in the Borough.
- 7.5.7 The EA have created the flood storage area to ensure no flooding downstream. This area is officially classed as a reservoir and supports semi mature wetlands. Cove Brook is a flashy stream and often overtops its banks within the winter period. The Basingstoke Canal also discharges any excess water into the Country Park to ensure the canal does not flood. To ensure no flooding further downstream, excess water is held within the storage area by the bund and slowly released into Cove Brook when water levels are lower. The route trenches through the bund before entering Cove Brook SINC.

7.6 The Cove Brook Greenways Group

- 7.6.1 The Cove Brook Greenways Group has managed Cove Brook since 1996. They have cared for the SINC's abutting Cove Brook, the EA flood storage area and the Cove Brook Greenway through the urban areas. It is due to this group that Cove Brook is such an asset to the borough.

7.7 Cove Brook Greenway

- 7.7.1 On leaving the Country Park the pipeline runs along the B3014 Cove Road. This is a busy road which provides a through route to Farnborough Main Station, Farnborough Road and the town centre beyond. At the roundabout, the route is deflected into Nash Close which is a small residential cul-de-sac, with the only access and exit being Cove Road, before directional drilling under Cove Brook and the South Western Main railway line.
- 7.7.2 To the north of the Country Park, Cove Brook becomes more urban. However, the waterway continues to run through public open space through much of the urban area, creating a green corridor linking the Country Park to the Cove Brook Greenway. Although the directional drill turns at right angles, the order limits extend through the southernmost part of the greenway with a compound situated within the greenway to the north of West Heath Road.
- 7.7.3 The EA, RBC and Network Rail are discussing The Cove Brook Greenways Enhancement Project, a green infrastructure initiative to enhance the Cove Brook corridor through the

urban area. The project will include works to the river to increase the meanders, provide backwaters and rills. Some sycamore will be felled to increase light levels within the corridor. The project will also establish improved river bank management. This project will promote community involvement and ownership of the Cove Brook corridor whilst hopefully growing the Cove Brook Greenways Group. It is planned to undertake the work required in the winter of 2020 and therefore these enhancements will be delivered, and the management well underway before the pipeline is laid in 2021.

7.8 South Western Main Railway Green Corridor

- 7.8.1 Once under the railway the pipeline route follows the railway with a directional drill under Prospect Road allotments (a community facility managed by RBC), ending at the Queen Elizabeth Park play area. The stringing out area extends west along the railway line, leading to the loss of a significant length of the treeline.
- 7.8.2 The South Western Main green corridor is of great importance to the fauna within Farnborough as it provides a safe route through the urban area with the larger sites along its route providing habitat stepping stones. West of the Borough boundaries, adjacent to the railway, lay Bramshott Farm SANG and Fleet Pond Nature Reserve. Both sites are managed for wildlife and are likely to provide important ecological sites for wetland and woodland species. The railway then passes through Cove, linking Southwood Country Park, Cove Brook Greenways, Prospect Road Allotments, Queen Elizabeth Park, Farnborough Hill School and St Michael's Abbey with the Blackwater Valley.
- 7.8.3 The South Western Main Line has been identified as one of Farnborough's green corridors providing a tree-lined corridor for wildlife connecting the countryside around North Camp and Fleet to the River Blackwater.

7.9 Queen Elizabeth Park

- 7.9.1 Queen Elizabeth Park is the only large area of woodland with open public access outside the SANGS network. It is well used as a commuting corridor for cyclists and pedestrians, as it provides a green route to Farnborough Main Station and into the town centre. The park is also a popular recreational and dog-walking destination and used by local schools for natural history lessons. It is a significant community resource for Farnborough. The proposals will lead to the temporary loss of the playground, though the applicants have committed to providing a new playground and some temporary facilities as part of the scheme.
- 7.9.2 The broadleaf woodland in the Park is around 50 years old, with some older specimens, which are of importance due to their age and ecological and amenity value. The site forms an important stepping stone for biodiversity within the South Western Main Green Corridor. Queen Elizabeth Park requires significant management in particular due to the presence of *Rhododendron Ponticum*.

7.10 Farnborough Hill Conservation Area & A325 Green Corridor

- 7.10.1 On exiting Queen Elizabeth Park, the Pipeline crosses the A325, a key north-south route through the Borough, providing links to Frimley Park Hospital, Farnborough Town Centre, Farnborough Main Rail Station and Farnborough Airport. The pipeline then runs through Farnborough Hill Convent School. The school is a grade 1 listed building and within the Farnborough Hill Conservation Area. This site is relatively wooded with a significant tree belt along much of the boundary and within the south-western corner of the school. ESSO have agreed that the route of the pipeline will run away from the trees within the school grounds.
- 7.10.2 On leaving the school the route of the pipeline then runs up Ship Lane past the Ship Inn, a building of Local Importance, and Ship Lane Cemetery SINC which is designated for its acid and neutral semi-improved grassland. It then passes down Ringwood Road and bisects Farnborough Hill Football Field. This facility is licenced to Aldershot Town FC and is used extensively within the football season. This a significant recreational resource for the Borough as it provides good changing facilities, not present in many other pitches.

7.11 North Down Railway, A331 & Blackwater Valley Green Corridors

- 7.11.1 Finally, the route crosses the railway and the A331 using directional drill. This road is a key arterial route connecting the M3 to the A31, which in turn connects to the A3 at Junction 10. The route then enters Blackwater Valley, bisecting the Blackwater Valley Frimley Bridge SINC. The Blackwater Valley, along with Cove Brook, is one of the most important green corridors for people and wildlife within the borough. Rowhill Nature Reserve in Aldershot contains the headwaters of the River Blackwater, with a long-distance path stretching throughout the river's length. The path passes through five boroughs providing an ecological and access connection throughout the Blackwater catchment. The path, the surrounding floodplain and the standing water habitats are managed by Blackwater Valley Countryside Partnership, in partnership with the owners of the sites adjacent to the river.
- 7.11.2 The application is unclear regarding the method of crossing the Blackwater Valley Frimley Bridge SINC, implying that open trenching is likely to be used. The SINC is designated for its floodplain and grazing marsh habitats and contains a historic landfill. On crossing the Blackwater River, the route passes out of Rushmoor Borough and into Surrey Heath.

8. Impact Assessment

- 8.0.1 As required by legislation, within this section RBC will assess the impacts of the project, using their local knowledge to determine whether the impacts are positive negative or neutral. RBC has identified that the proposals could have an effect on ecology, public amenity and hydrology and drainage. Where possible RBC has suggested avoidance mitigation and compensation measures, which will lessen any negative impacts. As stated, earlier Policy NE4 requires all development to provide a biodiversity gain. As the authority will be determining the conditions on these proposals, we would hope to achieve a biodiversity net gain, in line with our Local Plan policies.

8.1 Habitat loss within the Thames Basin Heaths

- 8.1.1 RBC does not agree with the conclusion of the information for the HRA, that direct habitat loss will not cause significant impacts on SPA birds and thus site integrity. The application documents states that it will take at least five years for acidic grassland and pioneer heathland to regenerate, and therefore any loss is likely to deplete habitats used by the SPA birds for at least a five-year period. As both Dartford warbler and woodlark prefer to nest in mature heathland a longer period of time is likely to be required to replace any nesting sites that have been lost.
- 8.1.2 In respect of the woodland to be lost, this cannot be replaced within the order limits, due to planting restrictions and will take far longer to regenerate. Although RBC acknowledge that in some cases felling woodland can be beneficial to heathland ecology, as this allows the heathland habitat complex to regenerate, areas of coniferous woodland are required by the male nightjars to undertake their breeding displays.
- 8.1.3 It is RBC's view that the impact caused to the bird populations, by the loss of feeding and breeding territories in the short and medium term, needs to be considered within any HRA. The Conservation of Habitats and Species Regulations 2018 63(2) state that, "*A person applying for any such consent, permission or other authorisation must provide such information as the competent authority may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required.*" RBC recommends that the applicant be required to provide adequate information on the area of heathland and woodland to be lost and its value as feeding, breeding or displaying habitat.
- 8.1.4 In conclusion it is RBC's view that the proposals could have a direct negative impact on the Thames Basin Heaths SPA, due to the habitats that will be lost and disturbed within the order limits. If further information shows that feeding and breeding habitat will be lost, it is RBC's view that avoidance mitigation and compensation measures should be required to ensure the impact is neutral.

8.2 Impacts on the Basingstoke Canal SSSI

- 8.2.1 In relation to the Basingstoke Canal although the order limits include the SSSI, the proposed directional drill will ensure that no bankside, marginal or aquatic habitats or dragonfly and damselfly habitat will be disturbed. Therefore, RBC assesses the impact as neutral.

8.3 Major transport routes

- 8.3.1 The route crosses the A323, A327 and A331 which are all identified as green corridors within the Local Plan. The roads will be crossed using directional drill and therefore, providing the surrounding vegetation is avoided, these works should have a neutral impact.

8.4 Pollution on Eelmoor Marsh SSSI and Ball Hill SINC

- 8.4.1 As the pipeline route does not enter Eelmoor Marsh SSSI and Ball Hill SINC there will be no direct impact on the designated sites. However, as with many wetland sites to be impacted, RBC is concerned that there are no details within the Construction Environment Management Plan (CEMP) as to how the hydrology and water quality is to be protected from

pollution due to dewatering and contaminated runoff. Without a detailed CEMP there is a risk that the wetland within the SSSI and wet heath within the SINC could be negatively impacted. Providing a requirement is made within the DCO for a detailed Construction Environment Management Plan containing safeguards and working practices to ensure no pollution, the impacts on Eelmoor Marshes would be assessed as neutral.

8.5 Impacts on the mature treeline along Old Ively Road Green Corridor

8.5.1 RBC notes that the route will follow Old Ively Road. Although the applicant has agreed to work within the road, to limit impact on the significant tree line, we would value details regarding how root zones are to be avoided during construction. The council is happy for this information to be incorporated into the detailed CEMP proposed.

8.6 Loss of amenity (and therefore function) within the Suitable Alternative Natural Green Space (SANGS) Network

8.6.1 Southwood Country Park is already becoming a busy site and RBC hope that its use will increase significantly when the café and visitor centre are delivered, and the habitat matures. RBC is very concerned that the tranquillity of and access to Southwood Country Park SANG and the adjacent Southwood Woodlands SANG, could be impacted by the proposed works for a significant period. It is the council's view that works proposed within Southwood Country Park are likely to lead to residents from a number of new developments within Farnborough being unable to access parts of the SANG or being deterred from using the SANG due to construction activities. Visitor research undertaken within the SPA showed that the users valued the ability to experience undisturbed natural habitats. To ensure that the SANGS network provided a similar experience to that gained within the SPA, the Thames Basin Heaths Partnership agreed SANG criteria. The criteria included the following specifications:

- SANGS must be perceived as semi-natural spaces with little intrusion of artificial structures except in the immediate vicinity of car parks.
- Access within the SANGS must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.
- SANGS must be free from unpleasant intrusions

8.6.2 The route of the pipeline will bisect the Country Park, running through the middle of both the eastern and western sections. This will compromise RBC's ability to fulfil the above criteria. There is uncertainty as to the timing and duration of the works. This lack of information makes it hard to quantify the level of impact to the SANG, and the consequential threat of the public using the SPA during the sensitive nesting season.

8.6.3 Recent visitor research has shown that less people are using the SPA with the new SANGS being used due to their proximity to residential areas. The potential impact of the works is that users will use the SPA in preference to the new SANGS, with a risk of recreational disturbance in the SPA.

8.6.4 RBC also notes that there is no indication of the length of the works within the SANGS. The applicant has indicated that the SANGS could be disturbed on several separate occasions

over the construction period of 2021 – 2023. This timetable could have a cumulative impact on visitor numbers, with visitors being repeatedly excluded from the SANGS. There is a risk that this could lead to the SPA being used over a protracted period. In the worst-case scenario visitor pressure on the SPA could increase over three breeding seasons.

- 8.6.5 Finally, a number of Local Authorities are concerned regarding the in-combination impacts on the SANG network across Surrey and Hampshire. Five SANGS will be disturbed along the route. Due to the lack of construction information, there is a risk that access to all these sites could be impacted at the same time.
- 8.6.6 In conclusion, currently the application does not provide certainty that the proposals will not impact on the access and amenity of the Country Park, or increase visitor pressure on the SPA, particularly within the sensitive breeding season. There is a significant risk that visitors could be deflected from the SANGS onto the SPA due to works proposed at Southwood Country Park individually, and from all five SANGS in-combination.
- 8.6.7 There has been no consideration of the mitigation and avoidance measures for recreational impacts in the applicant's assessment. RBC recommends that consideration is given to a requirement in the DCO for a construction plan that ensures: -
- No work will be undertaken within the SANG network during the sensitive bird nesting season.
 - Multiple periods of work within the SANGS are kept to a minimum and will be agreed by the Local Authority.
 - No two SANGs are disturbed at the same time.
 - Clear information will be provided to Local Authorities and SANG visitors regarding the timing and longevity of periods of disruption well in advance of the works to ensure that temporary disruption does not lead to long term changes in recreational habits.
- 8.6.8 It is RBC's view that the applicant should commit to site specific enhancements on and off site within all SANGs to be disturbed, to compensate visitors for any disruption to access and amenity caused during the works. In the case of Southwood Country Park any compensation that cannot be delivered on site could be delivered as part of the Cove Brook Greenways Enhancement Project.

8.7 Impacts on the Sites of Interest for Nature Conservation (SINC) within Southwood Country Park

- 8.7.1 There are two SINC's to be directly impacted by the scheme within Southwood Country Park; Cove Brook SINC and Cove Valley Southern Grasslands SINC. Both SINC's have been managed for many years by the Cove Brook Greenways Group a dedicated community group. The pipeline passes through Cove Brook and Cove Valley Southern Grasslands SINC's and runs adjacent to the Southwood Golf Course West SINC, an area of wet woodland and grazing marsh. Hedgerow 218, linked to Cove Valley Southern Grasslands SINC, has been assessed as likely to be of importance under the Hedgerow Regulations, but has not been surveyed.
- 8.7.2 Currently little mitigation is proposed for the scheme's impact to these sites, with only a

commitment to habitat being restored. Due to the maturity of the habitats within the SINC network, it is unlikely that habitat restoration will be able to provide like for like habitat replacement. Without mitigation RBC would assess the impact as negative. However, provided appropriate mitigation was negotiated for impacts on Southwood Country Park and Cove Brook the negative impact could be compensated in the medium term. In respect of Hedgerow 218 RBC would request that a requirement be included in the DCO that auger drilling is used under all hedgerows thought to be important to maintain their integrity.

8.8 Impacts on the ecology of Southwood Country Park and Cove Brook

- 8.8.1 Southwood Country Park is an important site within the Cove Brook Catchment. Due to its position at the top of the catchment, the ecology and water quality of the streams within the Country Park influence the health of Cove Brook further downstream. At present Cove Brook has poor water quality due to historic culverting and deflection of hydrological flows by the military and the golf course.
- 8.8.2 RBC and the EA have jointly funded the Cove Brook and Southwood Enhancement Project. This is an ambitious plan to naturalise the river network, removing culverts, connecting the headwaters to the rest of Ively brook, creating meanders, rills and backwaters and restoring the adjacent floodplain. It is hoped that the historic habitat complex of grazing marsh, rush pasture, acid grassland and wooded heath will regenerate in the longer term
- 8.8.3 The project undertaken within Southwood Woodlands and the Country Park will cover 87ha and provide a hub from which the Farnborough green infrastructure can grow. In addition to this project, RBC and the EA are in the early stages of planning a scheme of river enhancements and increased management to naturalise and enhance Cove Brook lower down the catchment, within the urban area.
- 8.8.4 The Cove Brook and Southwood Floodplain Enhancement Project and the works proposed for the urban river corridor will have been completed by 2021. Significant habitat creation and enhancement will have been undertaken, with grassland and floodplain habitats having matured.
- 8.8.5 Due to Cove Brook being classified as “bad” under the WFD, it is imperative that the enhancements to the river are carried out as soon as possible. RBC is concerned that the proposals will lead to a delay in some of the works both within the Country Park and further downstream
- 8.8.6 RBC is particularly concerned that the proposals will lead to a trench through the Ively Brook. As the Cove Brook and Southwood Floodplain Enhancement Project intends to do significant works to the brook and surrounding habitat, we would not wish to see the newly created habitats and brook being disturbed. We would request that the directional drill proposed under Ively Road is extended to ensure no disturbance of the river corridor or the adjacent habitats.

- 8.8.7 The Council also notes that, a haul road is to be sited across Cove brook. The haul road would lead to further disturbance of newly created and restored bankside habitats and create fragmentation of the ecological corridor in the short term. RBC wishes to explore the need for the road within the application process, to determine whether a less ecologically damaging solution can be found. However, if there is no other solution, RBC requests that details are provided as to the impact of the road on the brook and how the waterway is to be protected from any contaminants present.
- 8.8.8 Within the ecological survey undertaken in 2017, the grassland within the Country Park was classed as largely amenity grassland. At this time the site was still being used as a golf course with much of the grassland being closely mown. However since the relaxation of management in 2018 there has been a rapid regeneration of acid grassland and wetland within the eastern parcel, with a richer species composition than would usually be expected (*see section 7.5.2 for further details on the grassland ecology*) The proposals are likely to disturb mature acid grassland habitats within the east of the site that could be classed as permanent grassland. Permanent grassland is defined as: -
- Permanent grassland and permanent pasture (together referred to as permanent grassland) means land used to grow grasses or other herbaceous forage naturally (self-seeded) or through cultivation (sown) and that has not been included in the crop rotation of the holding for five years or more.*
- 8.8.9 RBC note that the applicant has obligated to replace the habitats disturbed on a like for like basis or provide a richer habitat. However, the grassland habitats within the east of the park will have matured significantly and are likely to contain significant biodiversity value. Surveys have shown that good communities of uncommon invertebrates are present across much of the terrestrial grassland in the east. Any newly created habitats will be less biodiverse requiring at least five years to attain the maturity of grassland lost. The trenching is also likely to lead to the mortality of rare and scarce invertebrate species, with less mature habitat being present to support the existing populations. The council are also concerned that the seed to be used for restoration will not be of local provenance and will dilute the genetic makeup of the adjacent grassland.
- 8.8.10 The pipeline will impact on a significant number of trees within the golf course. Due to the age of the trees, it is unlikely that the applicant will be able to provide trees of the same maturity and ecological value as the existing trees. TPO 043 is adjacent to the order limits. It is important that all TPO root zones are protected within the DCO
- 8.8.11 The hydrology within Southwood Country Park is essential to the survival of the grazing marsh, rush pasture and wet woodland habitats both within and outside the SINCs. RBC is concerned that the proposed trenching across the park will disturb the sensitive hydrological processes. There are currently no detailed proposals within the application documents to safeguard the hydrology or detail how runoff and contaminants will be contained to ensure no pollutants enter the hydrological system.

- 8.8.12 In relation to the flood storage area, RBC support the concerns of the EA that the proposals to trench through the bund that holds back the flood waters, would weaken its integrity and could lead to its failure when water levels are high. If the bund fails, there will be significant flooding throughout the Cove Brook Catchment which is heavily urbanised further downstream. RBC support any measures suggested by the EA to resolve this issue and will rely on their expertise in this matter. As the proposals stand, it is RBC's view that trenching through the bund could have significant negative impacts to the populace in the long term.
- 8.8.13 In conclusion the proposals will cause a significant negative impact on the ecology and hydrology within Southwood Country Park. The trenching proposed will impact on restored aquatic habitat within Ively brook, with the proposed haul road likely to fragment bankside habitats along Cove Brook. The breaching of the EA bund could lead to significant flooding. Mature and semi-mature terrestrial habitats of acid grassland, wet woodland, rush pasture grazing marsh and significant numbers of trees will be lost throughout the park, and there is a high risk that hydrological processes will be permanently changed.
- 8.8.14 To lessen the ecological damage to the riparian habitats, RBC recommends that the directional drill under Ively Road is extended to cover the Ively Stream and an alternative option to the haul road across Cove Brook is explored. If Cove brook does need to be crossed, site specific safeguards should be required within the proposed CEMP to ensure as little impact as possible from the haul road and ensure rigorous safeguards are in place to contain any contamination and preserve the hydrology within the park.
- 8.8.15 Further mitigation and compensation should be provided within the Country Park and along the Cove Brook corridor to ameliorate the ecological impacts to the Country Park and provide biodiversity net gain. It is RBC's view that a biodiversity offsetting calculation should be undertaken to quantify all ecological impact within the Country Park and throughout the borough, with habitat recreation; restoration and enhancement throughout the Cove Brook corridor negotiated to ensure impacts are neutral.

8.9 Disruption to Southwood Playing Fields and Cove Cricket Club

- 8.9.1 The pipeline will run along the boundary of Southwood Playing Fields and the car park within Cove Cricket Club (CCC). Southwood Playing Fields is the home to Rushmoor Community Football Club (RCFC), a Charter Standard Club with 40 teams and a hugely important asset for grass-roots football within the borough. In respect of the playing pitches the management restrictions imposed by the existing pipeline have meant that RBC has needed to shorten one of the pitches. If possible, we would like to agree a form of management that would ensure the council could again manage the full pitch. We would like to seek the same understanding/agreement as with Farnborough Gate to permit ongoing pitch maintenance which would then allow the possibility to extend this pitch back to its original size.

- 8.9.2 The use of Southwood Playing Fields will be restricted within the construction phase causing a negative impact, especially if within the football playing season and a pitch cannot be used. The loss of even one pitch for a club the size of RCFC is significant and in the extreme deny teams a place to play. In such a circumstance the council would seek compensation to provide an alternative pitch elsewhere for the duration of any disruption.
- 8.9.3 Cove Cricket Club are also a significant club within the borough and an important sporting asset providing cricket for adults, boys & girls locally and across the wider area. The council is concerned that the proposed route may impact on the use of the club. A significant area of concern is the proposed new practice nets which the club are due to construct (on the footprint of the old original nets) as these are planned to be used for training and coaching both within and outside of the cricket playing season. Disruption to the club car park could also have a detrimental impact in terms of accessibility and use of the clubhouse itself. RBC is happy to work with the applicant to help minimise any impact, however, if this is impossible then there will be a negative impact in the recreational resource. RBC requests that there is agreement within the examination process to ensure appropriate compensation for alternative facilities, loss of income or damage to the property of the club during the works.
- 8.9.4 Within the working area there are also several TPO trees which do not appear to have been mapped by the applicant. These will need to be preserved from any root damage due to the construction of the haul road or contamination due to fuel and chemical leaks within the storage compound.

8.10 Traffic disruption along Cove Road and Restricted Access to Nash Close

- 8.10.1 RBC is concerned that the works planned around Cove Road could cause significant disruption to traffic and restrict the movement of the residents within Nash Close for a considerable period of time. Cove Road is currently a main East West route through the borough as well as a busy route into the Town Centre. The proposals to close one side of the road are likely to lead to significant congestion and delay. As the only access and exit points to Nash Close are via Cove Road the residents are concerned that their movement could be hampered for a significant period due to the directional drill planned under the railway.
- 8.10.2 Within the DCO RBC requests that there is a requirement for a detailed transport plan to ensure impacts on Cove Road are kept to a minimum and access to Nash Close remains open throughout the construction works. There will need to be engagement with RBC and local residents in respect of the way in which road closures are managed.

8.11 Habitat loss within the Cove Brook Greenways

- 8.11.1 As stated previously the Cove Brook Greenways has been managed for many years by the Cove Brook Greenways Group. There are plans to enhance the Cove Brook Greenways to increase the biodiversity within the brook. *(See section 7.6 -7.7 for further details of the Cove Brook Greenways, the Cove Brook Greenways Habitat Enhancement Project and the Cove Brook Greenways Group.)* The compound South of West Heath Road is sited adjacent to Cove Brook. In this area the project is intending to create a meander and therefore the River

may have changed its position by the time the pipeline is laid. Although RBC has no objection to a compound within the open space, we request that a requirement is attached to the DCO for negotiation of the exact location nearer to the construction period. Any habitat lost should be replaced with a richer more biodiverse habitat, with contributions to the Cove Brook Greenways project to mitigate any disruption to the users.

8.12 Habitat loss along the South Western Main Railway Line Green Corridor and within Queen Elizabeth Park

- 8.12.1 The ESSO pipeline will lead to significant negative impacts on much of the woodland habitat within the South Western Main Railway Line Green Corridor, as it passes through Farnborough. The green corridor is of great importance to the fauna within Farnborough, as it provides a safe route through the urban area. *(See section 7.8.2 for further details)* The pipeline will cause significant habitat fragmentation along this corridor as the route follows the railway line closely.
- 8.12.2 To provide space for the stringing out of the directional drill under Prospect Road Allotments, a 65m corridor of broadleaved trees will be felled. To the east of the directional drill a 15m swathe of 50-year-old broadleaf trees will be lost throughout Queen Elizabeth Park, 5.8 acres of the 23.15 acres will be clear felled with 25.1% of the woodland being lost.
- 8.12.3 The loss of trees in two areas of the corridor will sever the continuous woodland and impact on the ecological carrying capacity of the woodland habitat within Queen Elizabeth Park. This habitat loss is likely to limit the roosting, nesting and foraging opportunities for bats, birds and invertebrates, as well as weakening the connecting corridor likely to be used by ground dwelling reptiles, amphibians, badgers and otter. This fragmentation could limit the recolonization of habitats within Southwood Country Park by severing the ecological links between the Country Park and the natural habitat to the east and west.
- 8.12.4 There are a number of TPOs within and adjacent to the railway. It will be important within the proposed CEMP that safeguards are provided to ensure the route zones of TPO 044 – 047 remain undisturbed.
- 8.12.5 In conclusion, the proposals will cause a significant negative impact on one of the most important ecological corridors in Farnborough. As woodland is to be felled is likely to be at least 50 years old, it will not be possible to compensate for the loss in the short, medium and long term. Due to the tree planting restrictions within the order limits 6.5m will need to be left clear of trees within Queen Elizabeth Park. This will amount to a significant permanent change to the character of the Park.
- 8.12.6 The council has endeavoured to negotiate a compensation package for the impact on the ecology within Queen Elizabeth Park with the applicants, throughout the pre application process. However, thus far the council has received no commitments from the applicant that would provide appropriate compensation for the long term or permanent loss of woodland habitat within the park.
- 8.12.7 To endeavour to compensate the losses within Queen Elizabeth Park and the wider corridor we recommend that the applicant undertakes a Biodiversity Offsetting calculation to assess

the true ecological impact to the corridor. This should include the trees to be lost in Southwood Country Park, along the South Western Main railway line and within Queen Elizabeth Park.

8.12.8 To increase the ecological resilience of the remaining woodland within Queen Elizabeth Park and to offset the harm, we propose that either a planning obligation is entered into or a requirement is attached to the DCO for the ecological compensation package below: -

- A full habitat survey
- A fully funded 10yr – 25yr management plan including provision for community work parties
- Establishment of alternative habitat such as acidic grassland
- Other offsetting works such as clearance of non-native species

8.13 Impacts on Access and Amenity within Queen Elizabeth Park

8.13.1 RBC is also extremely concerned regarding the impact the proposed works will have on the amenity value of Queen Elizabeth Park. Due to the clear fell, the directional drilling, the trenching and any habitat restoration, it is likely that the site will be inaccessible for a significant period of time. As there is only one main entrance in or out of the site, the public will be totally excluded from the site unless satisfactory temporary access measures are provided. The existing main footpath will not be accessible during the works. The works will also lead to the temporary loss of the playground adjacent to the woodland. RBC assess the impact on the access and amenity of Queen Elizabeth Park as negative.

8.13.2 The community that use the site are alarmed by the prospect of the permanent loss of a large portion of the woodland and have set up a group to campaign against the proposals. The Park is an important local amenity space for the local population and the views of this group should be considered.

8.13.3 RBC's view is that further measures to mitigate and where necessary compensate for these adverse impacts are required. These should be secured through a requirement in the DCO and/or a planning obligation. As a minimum they should address the management of the whole Park during construction and after construction. It is suggested that such proposals should cover: -

- The funding of a public consultation to enable the community to input any future plans for Queen Elizabeth Park
- A new playground
- A temporary playground whilst the works are undertaken
- Restoration of the car park
- Temporary and permanent footpath and access arrangements

8.14 Farnborough Hill Conservation Area & A325 Green Corridor

8.14.1 As stated previously Farnborough Hill School is a grade 1 listed building with the Ship Inn being a building of importance. There is also a TPO tree and an important group of trees along Ship Lane that appear not to have been mapped. Due to the changes made to the route around Farnborough Hill School as part of the pre application consultation, providing

the TPO and important trees and their root zones are protected the impact on the conservation area will be neutral.

- 8.14.2 The council is also concerned that traffic using Ship Lane will be disrupted by the proposed works. Although more of a local route than Cove Road the council feels that a Traffic Management Plan including alternative option for traffic should be produced as a requirement within the DCO.

8.15 Pollution and access to Ship Lane Cemetery SINC

- 8.15.1 As the pipeline route does not enter Ship Lane Cemetery there will be no direct impact on the SINC. However, RBC is concerned that there are no details within the Construction Environment Management Plan (CEMP) as to how SINC's are to be protected from pollution due to dewatering and contaminated runoff. Without a detailed CEMP there is a risk that the acidic habitats for which the SINC is designated could be negatively impacted. Providing a requirement is made within the DCO for a detailed CEMP containing safeguards and working practices to ensure no pollution, the impacts should be neutral.
- 8.15.2 Regarding access, the council wishes to ensure that there will be access to Ship Lane Cemetery at all times, during the construction period.

8.16 Disruption to Farnborough Hill Road Football and Bowls Club

- 8.16.1 The pipeline will bisect the Farnborough Gate Sports Complex main car park and football pitch and potentially also restrict access to the bowls club. There will be a definite negative impact on the use of the football pitch as open trenching will disrupt the playing surface requiring significant refurbishment works unlikely to permit use for at least a season. It is likely that the council will need to relocate the football club within the construction and recovery period.
- 8.16.2 Of greater concern however is the impact that the pipeline could have on the long-term use of the site. Considering the restrictions on management of Cove Playing Fields due to the pipeline, RBC has sought reassurances that this football pitch can be appropriately managed. Despite repeated requests, and information regarding management being submitted to the applicant, RBC is yet to receive any reassurances that management will not be hampered. Unlike Cove Playing Fields, Farnborough Hill Road Football pitch is used by an established club with any restrictions more likely to require the permanent relocation of the team. The inability to manage the pitch would also lead to the grounds becoming unusable. As Farnborough is a heavily urbanised borough, it would be unlikely that an alternative pitch could be provided and therefore disruption of the pitch would lead to a significant negative impact permanently.
- 8.16.3 Within the construction period RBC would expect the applicant ensure that the football club can be relocated. In the longer term the council would wish to negotiate terms within the DCO that enable us to manage the pitch as a sporting facility.
- 8.16.4 In relation to the bowling club providing access is maintained the impact should be neutral.

8.17 Tree loss along the North Downs Railway Green Corridor

8.17.1 A 380m of trees will need to be felled along the railway in order to undertake the directional drill under the railway's roads and the Blackwater River, 180m of which are within Rushmoor Borough. RBC acknowledge that the loss is unavoidable due to the stringing out process and the need to protect the Blackwater River and the SINC. The Council requests that impact to the tree line within North Downs Railway Green corridor should be included within the proposed Biodiversity Offsetting calculation with compensation provided within the Farnborough area.

8.18 Habitat loss within Blackwater Valley Frimley Bridge SINC

8.18.1 In the case of the Blackwater Valley Frimley Bridge SINC, RBC is concerned regarding the habitat loss within and adjacent to the SINC, the possible disturbance of contaminants within the landfill and the threat to the ecology within the Blackwater River, due to pollution. Although the stretch within our boundaries is to be directionally drilled, the council is keen to ensure the protection of the Blackwater River and the integrity of the SINC within both boroughs.

8.18.1 Within the application documents there are no details regarding the nature of the landfill or safeguards to ensure there is no contamination of the natural habitats. RBC recommends that the nature of the landfill is ascertained whilst the proposals are within examination. If there are contaminants that could be deleterious to the River Blackwater and the associated SINC habitats, RBC would request that there is a requirement for directional drill under the entire SINC and landfill or that the option to the South is again considered. The Council requests that a requirement is included within the DCO for a Construction Environment Management Plan (CEMP) detailing how working practices are ensure no pollution of the SINC or the River Blackwater as a result of the works.

8.19 Decommissioning of the existing and new pipelines

8.19.1 Nowhere in the application documents is the decommissioning of the existing or new pipelines mentioned. RBC has therefore been unable to ascertain the in-combination impacts of the construction and decommissioning on the Thames Basin Heaths SPA or the natural habitats and open spaces to be impacted. Within meetings the applicant has stated that currently they have not decided how to decommission the existing pipeline, but that it is likely to be filled in. Without details of the decommissioning process the council is unable to ascertain whether adverse impacts will occur. RBC would request that the applicant produce an in-combination assessment relating to the decommissioning of both pipelines so a true assessment of impact can be undertaken

9. Conclusion

9.0.1 These proposals will negatively impact many of the green corridors, open spaces, natural habitats and sports facilities within Farnborough. This will cause negative community impacts particularly in respect of the Borough's recreational resources. The significant tree loss along the railway lines and within Queen Elizabeth Park is also likely to fragment contiguous habitat causing impacts to the protected species that use the green corridors to commute between the larger sites with negative impacts on biodiversity. RBC does not feel that the avoidance, mitigation and compensation proposed within the application are adequate to ensure that impacts on ecology, hydrology and amenity are adequate to ensure no adverse impact in the short, medium and long term. Further there are potential direct and indirect impacts on the Thames Basin Heaths SPA which need to be further examined. Within the Local Impact Statement RBC has endeavoured to recommend avoidance, mitigation and compensation measures to endeavour to alleviate impact. By requesting these measures be required as part of the DCO process, RBC feels that there is potential to reduce the negative effects.