

# Southampton to London Pipeline Project

## Deadline 2

Draft SoCG with Rushmoor Borough Council  
Application Document: 8.4.27

Planning Inspectorate Reference Number: EN070005

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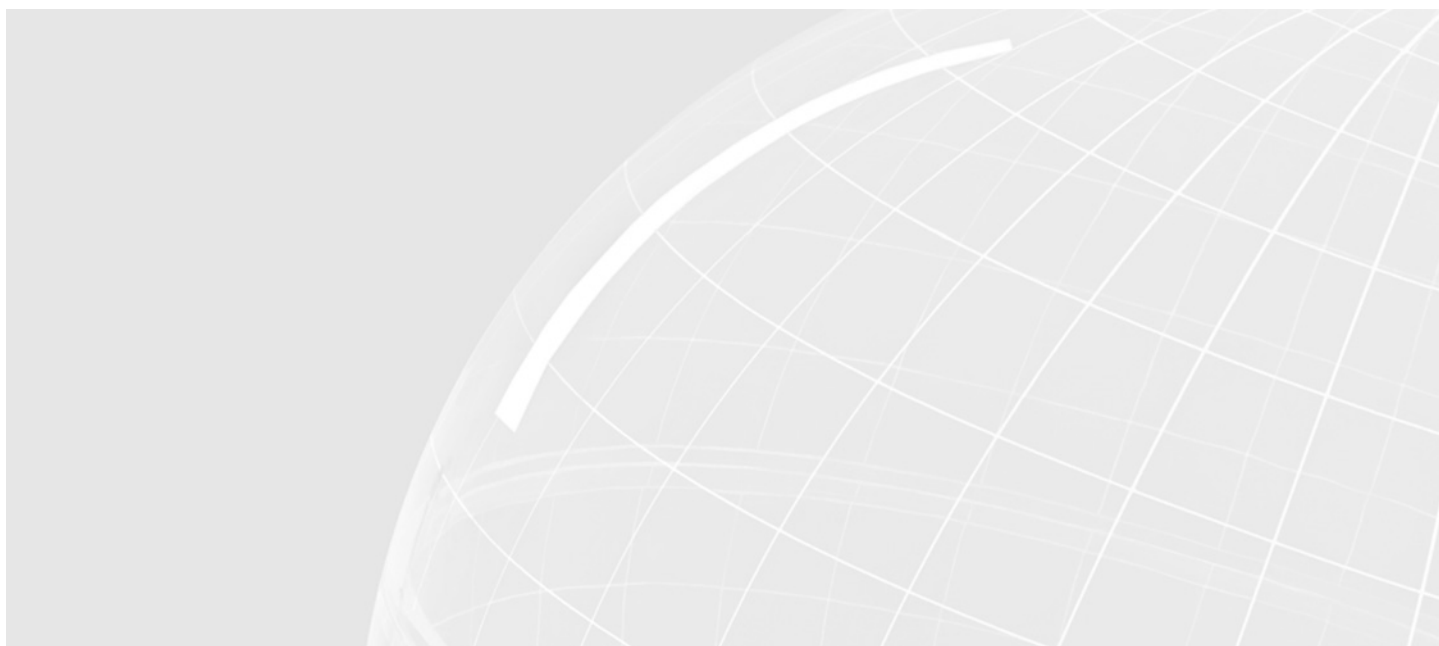


## **Southampton to London Pipeline Project**

### **Statement of Common Ground Between: Esso Petroleum Company, Limited and Rushmoor Borough Council**

Date: November 2019

Application Document Reference: B2325300-JAC-000-COE-REP-000279



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## Contents

<b>1.</b>	<b>Introduction .....</b>	<b>2</b>
1.1	Purpose of Document .....	2
1.2	Description of the Project.....	2
1.3	This Statement of Common Ground .....	2
1.4	Structure of the Statement of Common Ground .....	3
<b>2.</b>	<b>Record of Engagement Undertaken to Date .....</b>	<b>4</b>
2.1	Pre-application Engagement and Consultation .....	4
2.2	Engagement Following Submission of Application .....	9
<b>3.</b>	<b>Matters Agreed .....</b>	<b>10</b>
<b>4.</b>	<b>Matters Not Agreed .....</b>	<b>12</b>
<b>5.</b>	<b>Matters Subject to On-going Discussion .....</b>	<b>13</b>
<b>6.</b>	<b>Relevant documents and drawings .....</b>	<b>16</b>
6.1	List of relevant documents and drawings .....	16
<b>7.</b>	<b>Appendix A .....</b>	<b>17</b>
7.1	Response to Preferred Route Consultation .....	17
<b>8.</b>	<b>Appendix B .....</b>	<b>20</b>
8.1	Response to Design Refinements Consultation (1).....	20
8.2	Response to Design Refinements Consultation (2).....	23
<b>9.</b>	<b>Appendix C .....</b>	<b>24</b>
9.1	Letter sent to the project from the Authority regarding outstanding concerns on 16/04/2019.....	24

## **1. Introduction**

### **1.1 Purpose of Document**

- 1.1.1 A Statement of Common Ground (SoCG) is a written statement produced as part of the Application process for a Development Consent Order (DCO) and is prepared jointly between the applicant for a DCO and another party. It sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matters that are under discussion.
- 1.1.2 The aim of a SoCG is to help the Examining Authority manage the Examination Phase of a DCO application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning and provide greater predictability for all participants in examination. A SoCG may be submitted prior to the start of or during Examination, and then updated as necessary or as requested during the Examination Phase.

### **1.2 Description of the Project**

- 1.2.1 Esso Petroleum Company, Limited (Esso) launched its Southampton to London Pipeline Project in December 2017. The project proposes to replace 90km of its 105km aviation fuel pipeline that runs from the Fawley Refinery near Southampton, to the West London Terminal storage facility in Hounslow. In spring 2018, Esso held a non-statutory consultation which helped it to select the preferred corridor for the replacement pipeline. In autumn 2018, it held a statutory consultation on the preferred route for the replacement pipeline. In early 2019, it held a second phase of statutory consultation on design refinements. The application for Development Consent was submitted to the Planning Inspectorate on 14<sup>th</sup> May 2019.

### **1.3 This Statement of Common Ground**

- 1.3.1 This SoCG has been prepared jointly by Esso as the applicant and Rushmoor Borough Council as a prescribed consultee and Local Authority as defined within the Local Government Act 2000. Rushmoor Borough Council has interests in the SLP Project, as a Local Planning Authority, as a service provider to its businesses and residents and as a landowner affected by the project.
- 1.3.2 For the purpose of this SoCG, Esso and Rushmoor Borough Council will jointly be referred to as the “Parties”. When referencing Rushmoor Borough Council alone, they will be referred to as “the Authority”.
- 1.3.3 Throughout this SoCG:
- Where a section begins ‘matters agreed’, this sets out matters that have been agreed between the Parties.

- Where a section begins 'matters not agreed', this sets out matters that are not agreed between the Parties.
- Where a section begins 'matters subject to ongoing discussion', this sets out matters that are subject to further negotiation between the Parties.

#### **1.4 Structure of the Statement of Common Ground**

- 1.4.1 This SoCG has been structured to reflect matters and topics of relevance to the Authority in respect of Esso's Southampton to London Pipeline Project.
- Section 2 provides an overview of the engagement to date between the Parties.
  - Section 3 provides a summary of areas that have been agreed.
  - Section 4 provides a record of areas that have not yet been agreed.
  - Section 5 provides a list of ongoing matters (if any) that will be agreed or not agreed by the Parties during examination.
  - Section 6 provides a record of relevant documents and drawings

## 2. Record of Engagement Undertaken to Date

### 2.1 Pre-application Engagement and Consultation

The table below sets out the consultation and engagement that has been undertaken between the Parties prior to the submission of the DCO application.

Table 2.1 Schedule of pre-application meetings and correspondence

Date	Format	Topic	Discussion Points
04/12/2017	Correspondence	Project introduction	The project sent a letter to planning team at the Authority regarding: <ul style="list-style-type: none"> <li>• Map of current route</li> <li>• Project timeline</li> <li>• Project introduction</li> </ul>
17/01/2018	Phone Call	Project Progress	Principal Contracts Manager for the Authority provided project contacts for the Parks and Open Spaces, and Estates team.
19/01/2018	Hampshire Officers Forum	Project introduction	The Authority's planning contact was not able to attend.
19/01/2018	Hampshire Members Forum	Project introduction	The Authority's elected representative was not able to attend.
07/02/2018	Workshop	Environmental workshop	Authority officers invited but unable to attend. Requested more information to be sent on the project when available.
23/02/2018	Hampshire Officers Forum	Project update	The Authority's planning contact was not able to attend and asked to be sent copies of materials from this or any previous meetings. Information sent as requested.
23/02/2018	Hampshire Members Forum	Project update	The Authority's elected representative was not able to attend.
01/03/2018	Briefing note	Non-statutory (Corridor) consultation	Briefing note sent to all Local Authorities and councillors of wards/elected members within each corridor option.
02/03/2018	Correspondence	Data request	Liaison with the Authority over GIS and other data requested for the project.
15/03/2018	Correspondence	Commitment to Community Consultation – early view	Email sent to the Authority containing Commitment to Community Consultation (CtCC), and details of councillors that will be notified ahead of launch
19/03/2018	Correspondence	Non-statutory (Corridor) consultation launch	The project sent the Authority three letters: <ol style="list-style-type: none"> <li>1) Notification of launch letter (as a potential future statutory consultee)</li> </ol>

Date	Format	Topic	Discussion Points
			<p>2) A notification letter as a landowner, with a Person with an Interest in Land questionnaire and land plans</p> <p>3) Draft CtCC with a separate cover letter</p> <p>No feedback was provided on the CtCC.</p>
April 2018	Correspondence	Suitable Alternative Natural Greenspace (SANG)	Request from SLP Project Team to the Authority's GIS team for data and confirmation on status of SANGs within the borough. Information provided.
25/05/2018	Hampshire Officers Forum	Update	<p>The Authority's Development Manager attended the forum which:</p> <ul style="list-style-type: none"> <li>Presented the findings of the Pipeline Corridor Consultation and explained how the preferred corridor had been selected</li> <li>Details of the preferred corridor announcement were shared</li> </ul>
25/05/2018	Hampshire Members Forum	Update	The Authority's elected representative was not able to attend.
30/05/2018	Correspondence	Preferred corridor announcement	<p>The Authority was sent two letters:</p> <ul style="list-style-type: none"> <li>Letter as a key stakeholder regarding the preferred corridor that was selected</li> <li>A landowner letter</li> </ul>
27/06/2018	Correspondence	Initial Working Route	Project update regarding Initial Working Route release
05/07/2018	Meeting	Project update	The Authority's Development Manager met with the project to discuss route options and consultation outcomes relating to Rushmoor, including Ship Lane, Southwood Golf Course, Cove Road, and relationship with Farnborough Aerodrome. Agreed a briefing for ward councillors would be helpful.
09/07/2018	Consultation	Draft Statement of Community Consultation	<p>The draft Statement of Community Consultation (SoCC) was issued for statutory consultation to the Authority.</p> <p>Response received requesting inclusion of additional publication in the media list, and SoCC updated accordingly.</p>
25/07/2018	Meeting	Briefing for ward councillors	Project team briefing for Authority ward councillors and planning officers (requested after meeting on 05/07/2018), to explain reasoning behind selection and consideration of route options within the Authority.



Date	Format	Topic	Discussion Points
30/08/2018	Workshop	EIA Scoping	<p>Invitation was issued on 17/07/2018 to the main point of contact at the Authority.</p> <p>Several dates were offered. The Authority's Biodiversity Officer attended the workshop on 30 August.</p> <p>The workshop supported the Planning Inspectorate's scoping consultation.</p>
22/08/2018	Hampshire Officers Forum	Update	The Authority's Planning Officer was not able to attend.
22/08/2018	Hampshire Members Forum	Update	The Authority's elected representative was not able to attend.
06/09/2018	Correspondence	Launch of first statutory (Preferred Route) consultation	<p>The project sent the Authority two letters:</p> <ol style="list-style-type: none"> <li>1) Notification of launch letter (as a statutory consultee)</li> <li>2) A notification letter as a landowner, with a Person with an Interest in Land questionnaire and land plans</li> </ol> <p>(Both letters were in line with the Planning Act 2008.)</p>
19/10/2018	Correspondence	Response to first statutory (Preferred Route) consultation	The Authority responded to the Statutory consultation. A copy is enclosed at Appendix A. Comments focused on the potential environmental effects and the impact to cycle tracks and football grounds of the routing through Rushmoor.
31/10/2018	Site Meeting	Meeting	Meeting with the Authority's Ecology Officer and Open Spaces Manager on site at a number of open spaces – Queen Elizabeth Park, Pyestock Hill/Pondtail Heath SINC, Old Ively Road, Southwood Golf Course SANG, Southwood Meadow and discussion on others.
29/11/2018	Meeting	Project Update	<p>Project update provided to the Authority's Planning and Biodiversity Officers, including explanation of changes being included in Route Refinement consultation.</p> <p>Discussion of potential ecological issues relating to routeing through the Cove Brook and Queen Elizabeth Park areas. Agreement to hold further discussions on this topic.</p>
03/01/2019	Briefing Note	Next steps – Second statutory (Design Refinements) consultation	Sent to planning officers and councillors/ members. Provided an overview of the second statutory (Design Refinements) consultation and its contents ahead of the launch on 21 January 2019. The briefing note was accompanied by the offer of a meeting.

Date	Format	Topic	Discussion Points
08/01/2019	Correspondence	Unregistered land	Email sent to Authority Planning Officer about unregistered land in Rushmoor. Authority offered to look at any land in the borough that the project had been unable to identify ownership for through searches. Three plots of land sent through for any comment.
18/01/2019	Correspondence	Cumulative Effects	The project emailed the planning team regarding the identification of committed development for the assessment of cumulative effects associated with the scheme. A memo outlined the approach alongside a provisional long list and short list for feedback from the Authority.
18/01/2019	Correspondence	Launch of second statutory (Design Refinements) consultation	The project sent the Authority two letters: 1) Notification of launch letter (as a statutory consultee) 2) A notification letter as a landowner (Both letters complied with the approach set out in SoCC).
19/02/2019	Correspondence	Response to second statutory (Design Refinements) consultation	A copy of the Council's response is included at Appendix B. The Council was supportive of the reduced direct impact upon Cove Brook and SINC network but concerned about potential indirect impacts due to pollution within the runoff. Assurances were requested that pollution would be dealt with as part of the CEMP. The council also raised concerns regarding the impact on newly registered SINC's within Southwood Country Park SANG and on the Blackwater Valley Frimley Bridge SINC due to open trenching. The Council was also concerned regarding the impact on the hydrological flows within Southwood Country Park and the disruption to the use by residents. The Biodiversity Officer requested further discussion of potential environmental mitigation measures to endeavour to gain agreement in the pre-application stage.  The Council also raised concerns regarding the permanent impact on Queen Elizabeth Park and the impact on sports facilities. The Council also queried why the existing pipeline alignment could not be followed to avoid impacts on Nash Close.
18/03/2019	Correspondence	Ecology and Environmental Investment Programme	Email sent to The Authority's Biodiversity Officer with suggestions on potential ecological investments, including request for dates for meeting to discuss

Date	Format	Topic	Discussion Points
25/03/2019	Briefing note	Next steps	The project issued a briefing note to planning officers and councillors/members following the close of the second statutory (Design Refinements) consultation re: next steps.
27/03/2019	Correspondence	Final route release	The project issued a letter to planning officers announcing the final route and offering a meeting if required.
02/04/2019	Correspondence	Draft DCO	Project supplied the Authority with a draft of the DCO and asked for comments.
11/04/2019	Correspondence	Queen Elizabeth Park	Email sent to Authority Head of Planning on the potential impacts to play area (Neighbourhood Equipped Area of Play (NEAP)) in Queen Elizabeth Park and proposed commitment to reinstate the play area following completion of SLP construction and reinstatement works.  This email was not received by the Authority due to a technical issue, however a copy of the email has subsequently been provided after the initial version of the Statement of Common Ground was shared.
April 2019	Correspondence	Potential impacts on residents	Request for information from a councillor about potential impacts on residents in Stakes Lane, West Heath Road and Stuart Close. Information provided.
16/04/2019	Correspondence	Impacts on Southwood Country park SANG and Queen Elizabeth Park	Letter sent to the project team from the Authority detailing the impacts on the Southwood Country Park SANG and Queen Elizabeth Park Woodland and suggestions for appropriate mitigation. Concerns expressed regarding the suggestion that mitigation and compensation would be agreed outside the planning system as part of the Environmental Investment Programme. See Appendix D.
25/04/2019	Correspondence	Next steps	The project contacted the Authority to provide early warning of its submission for development consent.
09/05/2019	Meeting	Ecology	Meeting with Authority Biodiversity Officer to discuss environmental mitigation measures and the Environmental Investment Programme. The impact to the amenity areas and buildings were also discussed. The Authority made it clear that all mitigation and compensation for short medium- and long-term impact would need to be considered within the planning process and incorporated into a Section 106 obligation.

Date	Format	Topic	Discussion Points
			However, it was the Authority's position that it would be willing to consider an enhancement project for all impacted sites within the Environmental Investment Programme but only where it was additional to what it considers to be the necessary mitigation and compensation.

## 2.2 Engagement Following Submission of Application

The table below sets out the consultation and engagement that has been undertaken between the Parties since the submission of the DCO application.

Date	Format	Topic	Discussion Points
16/05/2019	Correspondence	Application submitted	The project confirmed that the application for Development Consent was submitted to the Planning Inspectorate and a USB containing the application was being sent in the post to the Authority's planning team.
06/06/2019	Correspondence	Consulting the project on planning applications	The project requested that the Authority consult it on planning applications where relevant.
10/06/2019	Correspondence	Safeguarding	The project confirmed with the Authority that it had been granted safeguarding and that it would be required to consult the project.
18/07/2019	Meeting	Update	Officers from the Authority attended a meeting arranged with Officers from Surrey Heath Council and the project team.
11/09/2019	Meeting	SoCG	The Parties met to progress the draft SoCG.
5/11/2019	Site Visit	Queen Elizabeth Park	The Parties attended a site visit to further discuss the park.
11/11/2019	Email	SoCG	The Applicant provided an updated SoCG to the Authority for comments.
13/11/2019	Email	SoCG	The Authority provided an updated SoCG to the Applicant for comments.
14/11/2019	Phone Call	SoCG	The Parties discussed the updates to the SoCG and the Applicant agreed to provide a copy to the Authority that it would be submitting at Deadline 2.

### 3. Matters Agreed

The table below sets out the matters agreed in relation to different topics.

Table 3.1 Schedule of matters not agreed

Examining Authority's Suggested Theme	Topic	Matter agreed
Need and Principle of Proposed Development and Examination of Alternative Routes	General	<p>The project and the Authority have met at appropriate times since the project launch in December 2017.</p> <p>The Authority submitted confirmation that they were satisfied that the consultation and engagement with its officers, members and residents has been robust and in accordance with the requirements of the Planning Act 2008 at the application approval stage.</p>
	General	The Authority is satisfied with the approach of consulting on corridors and then a route.
	General	<p>The Authority is satisfied that the statutory consultation on the pipeline route – both during the Preferred Route Consultation and the Design Refinements Consultation - was undertaken at the appropriate time and regular meetings were convened. The project acknowledges the Authority's consultation responses.</p> <p>The Authority gave its full opinion and comments as far as information was available regarding the pipeline route in its statutory consultation responses.</p>
	General	The Authority acknowledges that the project has listened to its consultation responses, with regards to the route alignment away from Cove Brook. It acknowledges that the project proposed and consulted on the Authority's preferred route alignment in this area within the second statutory (Design Refinements) consultation.
Planning policy	Development Land	The Authority is satisfied that the route of the proposed pipeline does not impact adversely on any strategic allocation identified in emerging or adopted local plans in the borough.
Planning policy	National Policy Statement(s)	<p>Both Parties agree that the relevant NPSs are:</p> <ul style="list-style-type: none"> <li>• Overarching NPS for Energy (NPS EN-1)</li> <li>• NPS for Gas Supply Infrastructure and Gas and Oil Pipelines (NPS EN-4)</li> </ul> <p>While the assessment of the application for development consent should be made against the NPSs, both Parties agree that the relevant Development Plan comprises of:</p> <ul style="list-style-type: none"> <li>• Rushmoor Local Plan (adopted Feb 2019)</li> <li>• Hampshire Minerals and Waste Local Plan</li> </ul>
	Development Plan	

Likely effects (direct and indirect) on special interest features of sites designated or notified for any nature conservation purpose	Environmental Impact Assessment	The Authority is satisfied that there are no residual effects on Basingstoke Canal SSSI.
Methodology for Environmental Impact Assessment including assessment of cumulative effects	Environmental Impact Assessment	The Authority agrees that the list of developments and allocations within its borough, considered in the cumulative effects assessment and reported in Chapter 15 of the Environmental Statement, is satisfactory.
Construction Effects on People and Communities	Queen Elizabeth Park play area	The Authority is satisfied that the project is appropriately managing the impacts including the temporary installation and post construction impacts on the equipped play area at Queen Elizabeth Park through the commitment to secure the reinstatement of the play area following completion of the SLP construction works, secured by the Code of Construction Practice (draft DCO Requirement 5).
Historic Environment		The Authority has raised no comments on this theme. It is responding to questions from the Examining Authority but subject to confirmation of queries on viewpoints it believes that there will be minimal direct impact on any listed building.
Security and Safety		The Authority has raised no comments on this theme.

## 4. Matters Not Agreed

The table below sets out the matters not agreed in relation to different topics.

Table 4.1 Schedule of matters not agreed

Examining Authority's Suggested Theme	Topic	Matter not agreed
	Decommissioning	As set out in the Authority's Local impact Report, it is the Authority's view that the impacts of decommissioning should be considered to ensure all impacts are mitigated. Due to the uncertainty regarding the technology available at the decommissioning stage, the Authority feels the precautionary principal should be used when assessing significant impacts. It also has concerns as a land owner which will be set out in its written representations.

## 5. Matters Subject to On-going Discussion

The table below sets out the matters subject to ongoing discussion.

Table 5.1 Schedule of matters subject to on-going discussion

Examining Authority's Suggested Theme	Topic	Matter subject to ongoing discussion
Need and Principle of Proposed Development and Examination of Alternative Routes	General	The Parties will continue to discuss the consultation process and how/if the Authority's concerns regarding impacts and mitigation have been addressed.
	General	The Parties will continue to discuss the proposals with regards to specific locations, such as Queen Elizabeth Park.
Methodology for Environmental Impact Assessment including assessment of cumulative effects	Environmental Impact Assessment	<p>The Authority has provided comments, via the scoping consultation and statutory consultation, on the Environmental Impact Assessment process.</p> <p>The Parties will continue to discuss the robustness of the impact assessment, including regarding cumulative effects.</p>
<p>Likely effects (direct and indirect) on special interest features of sites designated or notified for any nature conservation purpose</p> <p>Feasible and deliverable mitigation and method for securing such mitigation within the Development Consent Order</p> <p>Biodiversity</p>	Mitigation	<p>The project recognises that there is no statutory requirement for Nationally Significant Infrastructure projects to deliver net gain, or biodiversity enhancement. Environmental impacts are identified in the Environmental Statement and appropriate mitigation is set out in the application (see Chapter 16 of the Environmental Statement and the Register of Environmental Actions and Commitments (REAC)). However, the project recognises that installation of the replacement pipeline will still be outside of 'everyday activities or use' of the environmentally and social valued areas that the route travels through. As a good neighbour and responsible operator, it is developing the Environmental Investment Programme, in order to contribute to the communities who will become neighbours of the buried replacement pipeline. The Environmental Investment Programme comprises a range of activities along the replacement pipeline route to carry out localised environmental improvements and enhance local biodiversity, within environmentally designated sites and/or areas of social/community importance over and above what is required by planning policy.</p> <p>The Authority considers that the assessment of environmental impact fails to adequately identify the impact of the project and that the project's environmental mitigation is insufficient to remedy the impact. It challenges that it only need mitigate</p>



<p>Flooding and Water</p> <p>Landscape and visual impacts</p> <p>Data collection methods</p> <p>Identification and sensitivity of relevant features and quantification of potential impact</p>		<p>significant effects. Further, it feels that the project should provide a biodiversity net gain in accordance with Local Plan Policy NE4 recognising that this is an NSIP project but contesting that that it should be a material consideration. The Authority is dissatisfied that this is not shown within the application and feels that the consultation was therefore not meaningful.</p> <p>It requests that the project enters into a Section 106 agreement to ensure that all necessary mitigation and enhancement is secured through the planning process.</p> <p>In particular, the Authority feels that the Environmental Statement does not address the impacts of the project:</p> <ul style="list-style-type: none"> <li>• Habitat loss in the Thames Basin Heaths Special Protection Area</li> <li>• Impacts to public open space, associated facilities and other Authority-owned land affected by the proposals</li> <li>• Disturbance to the SPA due to an increase in visitors displaced from the SANG network</li> <li>• Run-off on designated sites and hydrology</li> <li>• Protected species (within the Country Park the Authority has undertaken species surveys given there have been changes to the baseline conditions. The Authority wishes for these findings to be considered within any mitigation package)</li> </ul>
Construction Effects on People and Communities	Queen Elizabeth Park, Open Spaces and Playing Fields	The Parties will continue to discuss the appropriate management of the impacts including the temporary installation and post construction impacts on Queen Elizabeth Park, Southwood Country Park and playing fields. The Authority has made comment in its Local Impact Report and will comment further in its written representations on these matters.
Highways and transport	Highways	The Parties will continue to discuss the approach to highway crossings and street works in the borough, particularly regarding the timings around Farnborough Air show and the British Car Show. The Authority has made comments in its Local Impact Report and will make further comments in its written representation. The Authority is keen to highlight the concerns of residents in residential areas and supports the residents' requests to be included within the examination process.
Construction Environmental Management Plan / Code of Construction Practice / Register of Environmental	General	<p>The Parties will continue to discuss the CEMP to provide assurance that installation impacts will be effectively managed. The Authority has raised concerns that the planning process may not provide opportunity for some issues to be addressed.</p> <p>The Parties will continue to liaise on the timing of works to reduce impacts on the Authority's improvement works, local events and seasonal constraints.</p>



Actions and Commitments		
Noise, air quality and disturbance during construction		The Authority has raised no comments on this theme however after detailed consideration of the application it will be making written representations and responding to questions on these matters. The Parties will continue to discuss this theme.
The Draft Development Consent Order		The Authority is making comments as part of the response to the Examining Authorities questions and in written representations. The Parties will continue to discuss this theme.
Historic Environment		The Authority has raised, and the Applicant has responded to concerns relating to the impact on the setting of the Farnborough Hill Conservation Area due to potential tree loss. It is important to the Authority that reduction of the tree loss is secured through the DCO process. The Parties will continue to discuss this theme.

## 6. Relevant documents and drawings

### 6.1 List of relevant documents and drawings

The following is a list of documents and drawings upon which this SoCG is based.

Table 6.1: Schedule of relevant documents

Application Reference	Title	Content	Date
EN070005 Document 6.1	Environmental Statement Non-Technical Summary	Overview of the Environmental Statement	14 May 2019
EN070005 Document 6.2	Environmental Statement	Report of the Environmental Impact Assessment	14 May 2019
EN070005 Document 6.3	Environmental Statement Figures	Illustrative material to support the Environmental Statement	14 May 2019
EN070005 Document 6.4	Environmental Statement Appendices	Additional data and evidence to support the Environmental Statement	14 May 2019
EN070005 Document 7.1	Planning Statement	Assessment of the application against National Policy Statements EN-1 Energy and EN-4 Oil and Gas Pipelines	14 May 2019

## 7. Appendix A

### 7.1 Response to Preferred Route Consultation

#### CONSULTATION ON APPLICATION

##### Location: Southampton to London

##### Description of Proposal: Replacement Pipeline Route Consultation

Thank you for consulting me on the above proposal. The comments below relate D and E, the sections within Rushmoor Borough. The comments are for ecology and open space management only. In my previous response, I expressed a number of reservations in relation to biodiversity impact. The workshop has allayed many of those concerns. I have now had the opportunity to study the route in detail and have highlighted a number of sensitive locations so avoidance, working practices, mitigation and compensation can be discussed when we meet at the end of the month.

##### Basingstoke Canal SSSI

I am pleased to note that the scheme aims to directional drill under the canal. I understand this is likely to be a complex operation. I would expect any application to contain a detailed methodology to ensure no damage to the infrastructure of the canal or pollution of the waterway.

##### Eelmoor Marshes SSSI

I note that the route runs contiguously with the northern boundary of Eelmoor Marshes SSSI with little buffer between the site and the route. It will be important that there is no damage to any part of the SSSI through habitat loss or pollution. The application should detail how direct and indirect losses are to be avoided during the construction process.

##### Ively Road Cycle Track

The corridor immediately adjacent to the SSSI contains a cycle route bordered by trees. This is categorized as priority habitat lowland mixed deciduous woodland by HBIC. As Rushmoor Borough is urban with few green routes available, one of the council's strategic aims is to create further green routes to enable the populace to use green transport and provide connected routes for wildlife. I am concerned that one of our few green cycle ways could be compromised by this scheme. As this route runs into Southwood Woodland and Southwood Golf Course SANGS the scheme could compromise the ability of people to walk and cycle to the SANG using a green route. I understand the need to avoid the SSSI, however I would like to discuss the likely loss of trees and how damage can be minimized.

##### Ball Hill SINC

Ball Hill SINC is designated predominantly for its acidic grassland and heath habitats that support the habitats on the nearby SSSI. I am concerned that a site compound is being situated immediately adjacent to the SINC. The proximity of the compound is a concern as any spillages would flow into the SINC. I would value discussion regarding whether a more appropriate location could be found further from the SINC. The application should detail how the SINC could be protected from direct and indirect impacts within the construction process.

I also note from the SINC survey, that surrounding habitat was thought to contain similar habitat to that within the SINC. A Phase 2 botanical survey should be undertaken to assess the quality of the habitat to be lost to the pipeline and compound.

##### Southwood Golf Course

I note that the route is directed straight across the golf course and will cause disruption to the SANG. As SANGs aim to deflect visitors from using the SPA it is important that the disruption is kept to a minimum and the habitat is restored as soon as possible after the work has been completed. As discussed within the workshop we would appreciate restoration to a richer more biodiverse habitat than that removed. We will need to ensure that the works are well publicized and so timely coordination with our communications team will be essential.

To the east of Ively road the habitat within the golf course is identified as grazing marsh by HBIC. By the time the pipeline comes through this is likely to be restored habitat. Throughout the golf course the methodology should seek to ensure that the hydrological processes are not disrupted in the long term or that Cove Brook does not become polluted.

### **Cove Brook**

Since the workshop, I have learnt much more about the Cove Brook catchment and now understand that the brook passing through the golf course is at the top of the catchment containing the headwaters of the brook. Although at present the stream is highly engineered, we are intending to undertake a project to naturalize the brook and the adjacent golf course returning it to floodplain and headwaters. Currently the route seems to slice straight through this area using open trenching. Although I understand the pipeline needs to run through the golf course I would like to work with the team to try to protect the restored habitat as much as possible within the scheme design.

### **Cove Brook Southern Grasslands**

I welcome the directional drilling proposed for Cove Brook however, the SINC is substantially larger than the area marked for directional drill with the route dissecting the SINC. Further damage would occur due to the construction of the access route to the adjacent site compound. This is a particularly well loved SINC managed by a voluntary group and provides supporting habitat for Cove Brook. To ensure no long-term impact to the SINC the route selected should be the most western route with directional drill undertaken throughout the SINC.

### **Cove Brook Greenways Group**

I have had discussions with the community group about the scheme and they will be submitting their own response to the consultation. They would like to attend the walkover to show the consultants the Greenways they manage

### **Queen Elizabeth Park**

The pipeline runs along the boundaries of this site and is likely to cause significant damage to the tree cover. Due to the impact on both the golf course and Queen Elizabeth Park it is my view that mitigation should be provided for habitats lost or disrupted. It is also important that the pipeline should show a biodiversity gain in line with the National Planning Policy Strategy. The works will cause significant disruption to the users of both sites and therefore it is my opinion that community compensation should also be provided

Both Andy Ford and I feel that the compensation and biodiversity gain should be focused at Queen Elizabeth Park and the woodland is in desperate need of survey and management. We would value discussion regarding the funding of the Queen Elizabeth Park restoration scheme which would require the following expenditure.

1. A full habitat survey
2. A 10yr management plan
3. A public communications program
4. Restoration of any trees removed or establishment of alternative habitat
5. A contribution to clearance the *Rhododendron ponticum*
6. Restoration of the car park

I hope we can discuss the project during the site visit.

### **Highgate Road, Farnborough Hill School and Farnborough Green**

I understand that the route will run around the boundaries of the school and Farnborough Green. Along the boundaries the habitat is identified as the priority habitat lowland mixed deciduous woodland. The linear woodland provides a connection between Queen Elizabeth Park and Farnborough Green for people and airborne species. I would like to discuss whether the trees can be avoided with the pipeline running through the adjacent grassland.



**Southern River Crossing – Blackwater Valley Frimley Bridge SINC**

I am pleased to note that the directional drill is to extend to the boundaries of the SINC on either side of the Blackwater River. Ideally the directional drill should be extended to cover all the wetland on the eastern side of the river within Surrey Heath.

**Northern River Crossing**

**Ship Lane Cemetery SINC**

This SINC is designated for its semi improved acid and neutral grassland. The pipeline route runs north of the SINC. It will be important to ensure that no contamination enters the SINC during construction.

**Highgate Football ground**

If this route were to be selected it would pass through the Highgate Football Ground. There are concerns regarding restoration and management of the grounds going forward. I believe that Andy Ford has submitted comments in respect to this issue and we would value discussion during the site visit.

**Blackwater Valley Frimley Bridge SINC**

I am pleased to note that the directional drill is to extend to the boundaries of the SINC and through the landfill on the eastern side of the river within Surrey Heath.

I hope these comments have been of assistance. I look forward to hearing from the team regarding a date for a site walkover. If you would like to discuss any issues or I can be of any further assistance please do not hesitate to contact me.

Regards

Debbie

## 8. Appendix B

### 8.1 Response to Design Refinements Consultation (1)



Council Offices, Farnborough Road,  
Farnborough, Hants. GU14 7JU  
Tel: (01252) 398 399  
Website: [www.rushmoor.gov.uk](http://www.rushmoor.gov.uk)

Your reference AS20/SLP 22100 A

Contact Debbie Salmon

Our reference DS/DCCons 324

Telephone 01252 398731

Email [Debbie.salmon@rushmoor.gov.uk](mailto:Debbie.salmon@rushmoor.gov.uk)

Jonathan Anstee de Mas, Land & Pipeline  
Technical Lead at Esso Petroleum Co. Ltd  
SLP Project  
The Estates Office, Norman Court  
Ashby-de-la-Zouch  
LE65 2UZ

Date 10 July 2019

Dear Mr Anstee de Mas

**Esso's Southampton to London Pipeline Project-Design Refinements Statutory Consultation  
Section 42 Planning Act 2008 ("the 2008 Act")**

Thank you for consulting me on the above proposal. The comments below relate D and E, the sections within Rushmoor Borough. The comments are for ecology only. In my previous response, I raised a number of concerns regarding the route. Both our site visit and the consultation have allayed some of those concerns but there are still a number of issues outstanding. Rushmoor is heavily urbanized and contains few semi natural habitats or open spaces. This project will disrupt a number of these sites temporarily with some of the proposals leading to the loss of trees, which will have a more permanent impact. I would like to meet with the team to discuss the issues below and agree avoidance and/or mitigation measures and a scheme to ensure biodiversity gain within Queen Elizabeth Park, Southwood Country Park SANG and along the green routes within the borough.

**Eelmoor Marshes SSSI**

I note that the route still runs contiguously with the northern boundary of Eelmoor Marshes SSSI with little buffer between the site and the route. I am particularly concerned regarding the impacts of runoff containing pollution. Could you provide me with information regarding the indirect impacts that have been identified and how these will be examined and mitigated within the application process either through the CEMP or via other avoidance and mitigation? The section on the CEMP currently does not identify pollution as an issue. I would appreciate assurances in writing that pollution to all designated sites will be covered within this document.

**Ively Road Cycle Track**

The corridor immediately adjacent to the SSSI contains a cycle route bordered by trees. This corridor is identified as priority habitat lowland mixed deciduous woodland by HBIC. I am aware we have discussed this route previously and that the intention is to place the pipeline within the adjacent road. As there have been no changes to the route in this location within the current consultation could you please confirm in writing that there will be no disruption to the cycle way or the trees.

**Ball Hill SINC**

Chief Executive Paul Shackley \* Corporate Director Ian Harrison \* Corporate Director Karen Edwards

[customerservices@rushmoor.gov.uk](mailto:customerservices@rushmoor.gov.uk)

[www.rushmoor.gov.uk](http://www.rushmoor.gov.uk)

DX 122250 FARNBOROUGH 2



Ball Hill SINC is designated predominantly for its acidic grassland and heath habitats that support the habitats on the nearby SSSI. During the site visit, we assessed the area proposed for the site compound. I can confirm that I am happy there will be no direct impact on the SINC due to habitat loss. As stated within the site visit the CEMP will need to detail how the SINC will be protected from indirect impacts such as pollution due to site runoff. The section on the CEMP currently does not identify pollution as an issue. I would appreciate assurances in writing that pollution to all designated sites will be covered within this document.

#### **Southwood Golf Course**

##### **Impact on Newly identified SINC habitats**

To the east of Ively road within the eastern section of the SANG and to the north of the western part of the SANG the habitat has been surveyed and identified as grazing marsh and wet woodland and grazing marsh respectively. These habitats are SINC quality. An extension of the current SINC designation, to include these areas, will be ratified by the SINC panel later this year. The pipeline will pass directly through the proposed SINC to the north and is likely to encroach on the grazing marsh east of Ively Road. Disruption of these habitats will need to be mitigated and resulting habitat enhanced. We are likely to work with the EA to enhance these areas as part of SANG habitat creation; therefore, it is imperative we agree mitigation for any impacts caused early so the works can be included within the project. I would like to discuss this at the proposed meeting.

##### **Cove Valley Southern Grasslands SINC**

I note that the compound has been moved further from the SINC alleviating the impact of the access track across the SINC. Within the site visit there was an agreement that the pipeline would follow the path through the SINC habitat. I would value confirmation that this is in fact the route proposed.

#### **Southwood Country Park**

##### **Hydrology**

Throughout the golf course, the project should seek to ensure that the hydrological processes are not disrupted in the long term or that Cove Brook does not become polluted. The section on the CEMP currently does not identify the preservation of hydrological pathways as an issue. I would appreciate assurances in writing that the safeguarding of the hydrology within the SANG will be covered within the application documents.

##### **Disruption of useable SANG**

I note that the route is directed straight across the golf course and will cause disruption to the SANG. As SANGs aim to deflect visitors from using the SPA it is important that the disruption is kept to a minimum and the habitat is restored as soon as possible after the work has been completed. As discussed previously we would appreciate restoration to a richer more biodiverse habitat than that removed and would expect there to be biodiversity gain within the golf course due to this development and that compensation is provided for the temporary loss of SANG whilst the works are being undertaken. I feel that we now need to meet to agree a scheme of mitigation, compensation and enhancement for the Southwood Country Park SANG and the SINC it contains before the application becomes live.

We will need to ensure that the works are well publicized and so timely coordination with our communications team will be essential.

#### **Queen Elizabeth Park**

The pipeline runs along the boundaries of this site and is likely to cause significant damage to the tree cover. Due to the impact on both the golf course and Queen Elizabeth Park, it is my view that mitigation must be provided for habitats lost or disrupted. It is also important that the pipeline should show a biodiversity gain in line with the National Planning Policy Strategy. The



works will cause significant disruption to the users of the site and therefore it is my opinion that community compensation should also be provided

I am concerned that within the site visit ESSO appeared unwilling to consider providing anything outside the red line on this site. The significant loss of trees will not be mitigated for many years and the lack of natural habitat within Rushmoor means that this project will cause the loss of a significant percentage of natural habitat at the residents disposal. We wish to discuss urgently the funding of the Queen Elizabeth Park restoration scheme which would require the following expenditure.

- A full habitat survey
- A 10yr management plan
- A public communications program
- Restoration of any trees removed or establishment of alternative habitat
- A contribution to clearance the *Rhododendron ponticum*
- Restoration of the car park

The recent biodiversity gain consultation indicates that the government will expect the Defra metrix to be used to ensure biodiversity gain. Due to the period it will take for the trees to re-establish it is likely that the metrix will recommend a significant mitigation package. I hope we can meet to discuss this issue soon.

Highgate Road, Farnborough Hill School and Farnborough Green

I understand that the route is now avoiding the trees around the periphery of this area with the pipeline running through the adjacent grassland. I would value confirmation of this change in writing.

#### **E4a River Crossing**

##### **Ship Lane Cemetery SINC**

This SINC is designated for its semi improved acid and neutral grassland. The pipeline route runs north of the SINC. The CEMP will need to ensure that safeguards are in place to ensure no contamination enters the SINC during construction.

##### **Highgate Football Ground**

This route passes through Highgate Football Ground. Could someone please contact Andy Ford [andy.ford@rushmoor.gov.uk](mailto:andy.ford@rushmoor.gov.uk) to discuss the mitigation to be provided and future management issues?

##### **Blackwater Valley Frimley Bridge SINC**

I am concerned that open trenching is being considered through this SINC as this could have a deleterious impact on both the SINC and the Blackwater River. The area is a landfill and as such disturbance of the habitat could lead to pollution of the SINC and the river. I would like to discuss this decision in more detail within the proposed meeting

I hope these comments have been of assistance. I look forward to hearing from the team regarding a date for a meeting before submission of the application to discuss the above issues.

Yours Sincerely  
Debbie Salmon  
(Biodiversity Officer)

## 8.2 Response to Design Refinements Consultation (2)



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Farnborough, Hants. GU14 7JU  
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Website: [www.rushmoor.gov.uk](http://www.rushmoor.gov.uk)

Your reference AS20/SLP\_22100 A

Contact Mr I J Nasce

Our reference IJN/ COM175

Telephone 01252 398411

Jonathan Anstee de Mas, Land & Pipeline  
Technical Lead at Esso Petroleum Co. Ltd  
SLP Project  
The Estates Office, Norman Court  
Ashby-de-la-Zouch  
LE65 2UZ

Email [ivan.nasce@rushmoor.gov.uk](mailto:ivan.nasce@rushmoor.gov.uk)

Date 23<sup>rd</sup> January 2019

Dear Mr Anstee de Mas

**Esso's Southampton to London Pipeline Project-Design Refinements Statutory Consultation**  
**Section 42 Planning Act 2008 ("the 2008 Act")**

Thank you for your letter dated 19<sup>th</sup> January 2019, with enclosure, which have been copied to the Council's Parks Development Officer and Principal Contracts Manager.

The Parks Development Officer has commented as follows.

"Points to note for Rushmoor are:

1. Greater impact through the now Southwood Park SANG (formerly golf course).
2. Re-route via Nash Close likely to be unpopular with residents of that close, why have they not used existing route?
3. Impact to allotment users at Prospect Road.
4. Impact to Farnborough Gate football pitch, potential relocation and need for agreement to continue maintenance.

The next most important information for us is timescales."

Yours sincerely



Ivan J Nasce, MRICS  
Estates Officer

## 9. Appendix C

### 9.1 Letter sent to the project from the Authority regarding outstanding concerns on 16/04/2019



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Your reference

Contact Debbie Salmon

Our reference DS/DCCons 349

Telephone 01252 398731

David Jones  
Technical Director - Ecology |  
Environment, Maritime and Resilience  
Jacobs U.K. Limited  
1180 Eskdale Road,  
Winnersh,  
Wokingham

Email [Debbie.salmon@rushmoor.gov.uk](mailto:Debbie.salmon@rushmoor.gov.uk)

Date 16 April 2019

Dear David

**Esso's Southampton to London Pipeline Project-Design Refinements Statutory Consultation  
Section 42 Planning Act 2008 ("the 2008 Act")**

Thank you for your emails. I am sorry for the delay in getting back to you. Both Glyn Lloyd (Estates Officer) and I would be happy to meet with you. We are free on the following dates:-

18/4/2019 All day except 3pm – 4pm  
30/4/2019 PM  
1/5/2019 All day until 4PM  
2/5/2019 PM  
7/5/2019 PM  
8/5/2019 11:00 – 14:00 & 15:30 – 17:30  
9/5/2019 All day

If I have understood your email correctly, it is proposed that C is to provide the funding for the works to the SINC, the former golf course and Queen Elizabeth Park and that this funding would be agreed outside the planning system. As I know you are aware the ESSO Southampton – London Pipeline will cause significant damage to a number of our open spaces, with tree loss in particular causing damage that cannot be fully compensated for a number of years. I am concerned that ESSO's obligations to mitigate or compensate habitats and provide biodiversity gain would not be fulfilled if all projects were considered outside the planning process. I would also have concerns that the appropriate measures to ensure no impact would be difficult to secure within a voluntary agreement. Within our meeting we need to clarify what will be provided as part of the planning process and what could be delivered as part of Environmental Investment Programme and how this is to be secured.

**Cove Brook / Southwood Country Park**

Within Cove Valley Southern Grassland SINC and the adjacent reservoir area we would wish to see scrub removal and habitat creation to mitigate the disturbance to the trees within the SINC. To mitigate any impact on the path running through the SINC there should be contribution to boardwalk approx. 300m – 400m and signage.

I am not sure where the idea to landscape the SINC entrance came from though I do vaguely remember talk about trees. I do not support planting within a SINC designated for its grasslands but I am happy to discuss it.

The EA are undertaking a project in partnership with RBC within the former golf course, with works being undertaken during the winter of 2020. This project will remove the hard surfacing within the Cove and Marrow Brooks and take the pumping mechanism out. We are intending to take out some trees to allow light into the streams and naturalise the streams and ditches. As significant areas within the Golf Course already contain grazing marsh habitat we are going to observe what naturally regenerates before attempting any habitat creation.

One of the things we need to ensure is that the pipeline does not destroy the habitat work undertaken the year before. We will need to liaise closely to ensure that works are not undertaken on the pipeline route if at all possible, and that any works planned within the pipeline area are undertaken as part of the ESSO pipeline project.

In regards to the mitigation for the wider Country Park, the headwaters are likely to be wooded so any trees lost in this area will need to be replaced. The members have requested that a network of hedgerows and copses are created. Some of this woodland creation is likely to dissect the pipeline route and so should be secured as part of the SLP project. There also may be opportunities to provide ponds and scrapes.

As stated previously any habitat boardwalks and paths that need to be disturbed must be reinstated with any grazing marsh and the hydrological processes that support the habitat are replaced.

The SINC within the new Country Park have been extended recently with one new area designated see map attached.

### **Queen Elizabeth Park**

As you are aware, Queen Elizabeth Park is going to experience significant damage with a number of trees removed. The felling of significant areas of trees and the loss of the wooded aspect of the site, is likely to upset the regular users. Therefore, we need to ensure we have evidence that mitigation and compensation is being provided for damage with the woodland overtime being better than before the pipeline was constructed. Therefore I feel the following contributions are required.

- A full habitat survey
- A 10yr management plan
- A public communications program
- Restoration of any trees removed or establishment of alternative habitat
- A contribution to clearance the *Rhododendron ponticum*
- Restoration of the car park

I look forward to hearing back from you regarding a date.

Yours Sincerely  
Debbie Salmon  
(Biodiversity Officer)