Southampton to London Pipeline Project

Deadline 4

Responses to ExA's Further Written Questions - Flood Risk, Water Resources and Geology (FR)

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Contents

1 Response to the Examining Authority's Further Written Questions – Flood Risk, Water Resources and Geology (FR)

Table 1.1: Applicant response to Question

ExQ2	Question:	Applicant response to Question:
FR.2.2	**In response to ExA WQ FR.1.12 [REP2-043] the good practice commitments of relevance to sediment discharge are explained.** **Set out the approach to ensuring how these standards would be met during construction.**	1.1 The Applicant has produced an Outline Water Management Plan (WMP) as Appendix B of the Outline Construction Environmental Management Plan (CEMP) (**Document Reference 8.51**). The Outline WMP includes the commitments set out in FR.1.12 (**REP2-043**). The final WMP would contain the methodology as to how the commitments would be implemented on site. It also includes the proposed roles and responsibilities of relevant staff that would be appointed during construction to implement and check compliance with the WMP. 1.2 The final WMP would be submitted to and approved by the relevant planning authority following consultation with the Lead Local Flood Authority and/or the Environment Agency as regards any water mitigation and management measures relevant to that stage, in accordance with Requirement 6 of the draft Development Consent Order (**Document Reference 3.1 (5)**). 1.3 Discharges during construction would be subject to consenting by the Environment Agency or the sewage undertaker if discharged to a sewer.

ExQ2	Question:	Applicant response to Question:
FR.2.3	**In response [REP2-043] to ExA WQ FR.1.13 [PD-008] the good practice measures relevant are set out. Commitment G116 is for an Erosion and Sediment Control Plan to be produced by the contractor and Commitment G131 is for the retention of in-channel vegetation which is not directly affected by installation works. i) Explain how the Erosion and Sediment Control Plan would be secured through the dDCO and who would be responsible for its approval.** **ii) Clarify how it will be determined whether vegetation will be directly affected by installation works;**	1.1 In response to i), the Erosion and Sediment Control Plan (commitment G116) has been incorporated into the Outline Water Management Plan (WMP). The WMP is Appendix B of the Outline Construction Environmental Management Plan (CEMP) (**Document Reference 8.51**)) and will be a certified document. The final WMP would be submitted to the Environment Agency and the relevant Lead Local Flood Authority prior to approval by the relevant planning authority. 1.2 In response to ii), the direct effects of construction on in-channel vegetation would be limited to vegetation removal for the length of watercourse that is impacted by the works. This will be a maximum of 10m as per commitment O1. The Applicant will prepare a set of 'Vegetation Retention and Removal' drawings prior to construction. Samples of these drawings have been provided at Deadline 4 (**Document Reference 8.66**). These drawings will identify the locations of in-channel vegetation to be directly affected by construction work. 1.3 Reinstatement planting would be undertaken to restore any in-channel vegetation removed to facilitate construction. The approach to reinstatement is set out in the Outline LEMP submitted at Deadline 4 (**Document Reference 8.50**). This would broadly comprise reinstatement of the natural bed of the watercourse and riparian vegetation using the removed material where appropriate, on completion of construction. 1.4 Measures for the reinstatement of in-channel vegetation will be set out in the final LEMP, which will be approved by the relevant planning authorities in accordance with the Outline LEMP. Furthermore, the Applicant is required to restore temporarily possessed land to the reasonable satisfaction of the landowner by virtue of Article 29(4). 1.5 The Applicant would be responsible for reinstatement of in-channel vegetation.

ExQ2	Question:	Applicant response to Question:
	where in-channel vegetation is to be removed; how vegetation would be re-instated and if so, how will this be secured through the dDCO [REP3-006] and who will be responsible for the reinstation of in-channel vegetation.	
FR.2.4	**In its response to Response to ExA WQ FR.1.17 [REP2-043], the Applicant sets out that professional judgement will be used to identify mitigation measures. It is assumed that this will be the decision of the contractor.** **i) Explain whether such an approach should be set out and secured in the CEMP.**	1.1 In response to i), the Applicant has produced an Outline Water Management Plan (WMP) as Appendix B of the Outline Construction Environmental Management Plan (CEMP) (**Document Reference 8.51**). The Outline WMP includes commitment W12 in relation to private water supplies and what would be contained in the final WMP. The final WMP would set out the procedure for identifying and managing private water supplies within the Order Limits, including the procedure for contacting landowners and tenants and arrangements for providing an alternative water supply as appropriate if the private water supply is affected, in accordance with commitment W12. 1.2 The final WMP would be submitted to and approved by the relevant planning authority following consultation with the Lead Local Flood Authority and/or the Environment Agency as regards any water mitigation and management measures relevant to that stage, in accordance with Requirement 6 of the draft Development Consent Order (**Document Reference 3.1 (5)**). 1.3 In response to ii), commitment W12 is currently secured within the Code of Construction Practice (**Document Reference 6.4 Appendix 16.1 (3)**). As it is also included within the Outline WMP,

ExQ2	Question:	Applicant response to Question:
	ii) State how the mitigation measure W12 would be secured through the dDCO [REP3- 006].	which forms an appendix to the CEMP, the commitment would also be secured through Requirement 6 (CEMP).
FR.2.6	**For the Applicant:** **Considering the EA's comment in [RR-239] that sites in place for over 18 months should take climate change into consideration and that the logistics hubs could be in place for up to two years; provide an explanation for why climate change has not been taken into consideration within the logistic hubs FRA.** **For the Environment Agency:** **Provide comment on the Applicant's response to**	1.1 The Applicant does not consider the potential extension beyond 18 months as significant as all or both logistics hubs (depending on whether the reduction from six to two is accepted) would be temporary. The probability of a 1 in 100 event occurring during a two year period is 0.02 (2%) as stated in Table 4.1 of the Flood Risk Assessment (**Application Document APP-134**). The potential for the predicted impacts of climate change to increase the impact of a flood event over a two-year time period is considered minimal. 1.2 As stated in the response to FR.1.23 (**REP2-043**), the logistics hubs could be in place for the full two-year construction programme. At that time, the only logistic hub within Flood Zone 3 was the M3 Junction 3 New Road Logistics Hub 1.3 As part of the Deadline 3 submission, the project submitted the Change Request - Temporary Logistics Hubs report (**REP3-022**). This document stated the Applicant's intention for the following logistics hubs to be removed from the project: • A31, Ropley Dean; • M3 Junction 3: New Road, Windlesham; and • Brett Aggregates, Littleton Lane, Shepperton. 1.4 In addition, the size of the following two logistics hubs will be reduced: • A31/A32 Junction, Northfield Lane Alton; and • Hartland Park Village, Farnborough.

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	ExA WQ FR.1.23 in [REP2-042].	1.5 Finally, the Ministry of Defence (MoD) land: Deepcut Bridge Road, Frimley Green will also no longer be a temporary logistics hub but a construction compound. 1.6 Neither one of the remaining logistics hubs is located within Flood Zones 2 or 3, and therefore are at low risk of fluvial flooding (based on the Environment Agency's definition). As such, it is not considered necessary to consider climate change impacts relevant to this source of flooding.
FR.2.8	**In its response to ExA WQ FR.1.24 [REP2-043], the Applicant confirmed that the Cove Brook flood storage facility would be subject to trenchless crossing. The General Arrangement Plans submitted at D3 [REP3-005] continue to show this as being subject to trenched crossing.** **Confirm that the Cove Brook flood storage facility will be crossed by trenchless crossing and provide an updated General Arrangement**	1.1 The Applicant can confirm that the flood storage facility would be crossed by a trenchless technique and also that the General Arrangement Plans submitted at Deadline 3 (REP3-005) have been amended and submitted at Deadline 4 (**Document Reference 2.6 (4)**).

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	Plans and CoCP to reflect this change.	
FR.2.9	**In ExA WQ ALT.1.8 [PD-008] the ExA requested details of the discussions that have taken place between the Applicant, the EA and the landowner regarding potential conflict with the Thames Flood Defence Scheme. In its response [REP2-038], the Applicant stated, amongst other things, that discussions are ongoing but that it has a good degree of confidence that matters will be agreed before the end of Examination.** **Provide an update.**	1.1 The Applicant is continuing to engage with the EA in respect of the interaction between the Thames Flood Defence Scheme (TFDS) together with the proposed and existing pipeline routes. The Applicant is assessing the engineering feasibility of installing the pipeline within this former landfill site at sufficient depth to accommodate the TFDS. Alternatively, the Applicant would look to agree provisions to locally divert the pipeline at a later date in advance of the TFDS construction. 1.2 Part of the engineering feasibility assessment includes further ground investigation work by means of a borehole for which the Applicant is engaging with the landowner (Brett Aggregates) and the EA regarding the necessary permit for the borehole. 1.3 The Applicant still considers that matters will be agreed before the end of Examination.