

Southampton to London Pipeline Project

Deadline 4

Responses to ExA's Further Written Questions -
People and Communities (PC)

Application Document: 8.41

Planning Inspectorate Reference Number: EN070005

Revision No. 1.0

January 2020



**Southampton to London Pipeline Project
Response to the Examining Authority's Further Written Questions – People
and Communities (PC)**



Contents

1 Response to the Examining Authority's Further Written Questions – People and Communities (PC)..... 2
References..... 10



1 Response to the Examining Authority's Further Written Questions – People and Communities (PC)

Table 1.1: Applicant response to Question

ExQ2	Question:	Applicant response to Question:
<p>PC.2.1</p>	<p>For the Applicant:</p> <p>In response to Action Point 19 [REP3-015] that arose from the ISH on Wednesday 4 December 2019 [EV-010a and EV-010b], explain why the following locations were not included in the list:</p> <p>i Ashford: Ferndale Road;</p> <p>ii Lightwater: Briar Avenue; and</p> <p>iii Farnborough: Woodland Crescent, Woodstocks, the Chase, Queen Victoria Court, Cabrol Road and Stakes Lane.</p> <p>For Relevant Planning Authorities:</p>	<p>1.1 The Applicant has undertaken a noise modelling assessment of the likely noise impacts of the project. This identified those locations and roads where noise levels at the façade of one or more properties are predicted to exceed the significance threshold.</p> <p>1.2 It is the locations identified as likely to exceed the significance threshold that will receive mitigation such as Echo acoustic fencing.</p> <p>1.3 Ferndale Road, Ashford; Briar Avenue, Lightwater; Woodland Crescent, Woodstocks, the Chase, Queen Victoria Court, Cabrol Road and Stake Lane in Farnborough, were not on the list as the assessment showed no exceedance of the significance threshold.</p> <p>1.4 The Applicant can confirm that Cabrol Road and Stake Lane will now receive mitigation, based on the revision to the assessment approach described in Revision 2.0 of Appendix 13.3 Noise and Vibration Technical Note Addendum submitted at Deadline 4 (Document Reference 8.14 (2)).</p> <p>1.5 Should the detailed assessment undertaken to inform the final Noise and Vibration Management Plan indicate that the significance threshold would be exceeded at any other locations, those additional locations would be added to the list to receive mitigation.</p>



ExQ2	Question:	Applicant response to Question:
	<p>Review the locations where the Applicant has suggested the use of Echo fencing as noise mitigation and provide with explanation any other locations where such mitigation would be needed.</p>	
<p>PC.2.2</p>	<p>The Statement of Reason [AS-010a] refers to the fact that the proposed temporary construction compounds would not be connected to facilities and as a result would need to use a generator.</p> <p>i) Signpost or provide information on the generator including its noise emittance levels and hours of use; effects on receptors and mitigation if required.</p>	<p>1.1 In response to i), commitment G24 of the Code of Construction Practice (CoCP) (Document Reference 6.4, Appendix 16.1(3)) requires: <i>“In the absence of a mains electricity supply, super silent pack generators would be used as an alternative power supply. A generator shall be considered ‘super silent’ if it meets the following criteria:</i></p> <ul style="list-style-type: none"> • <i>has a maximum noise output of 69 dB(A) at 7m;</i> • <i>is fitted with a silencer in the diesel combustion exhaust system; and</i> • <i>includes a layer of barrier material within the casing of the generator to reduce noise breakout.”</i> <p>1.2 Commitment G24 has been revised at Deadline 4 to ensure that the generators at construction compounds comply with these requirements. It is secured through DCO Requirement 5 (CoCP). Also included within the Outline CEMP.</p> <p>1.3 The level of 69 dB(A) at 7m is equivalent to the source noise level assumed in the noise assessment. Therefore, the effects on receptors are those described in Revision 2.0 of Appendix 13.3 Noise and Vibration Technical Note Addendum submitted at Deadline 4 (Document Reference 8.14 (2))</p> <p>1.4 In response to ii), the generators would operate during the 'normal working hours', which are assumed to be between 08:00 and 18:00 on weekdays and Saturdays as set out in Requirement</p>



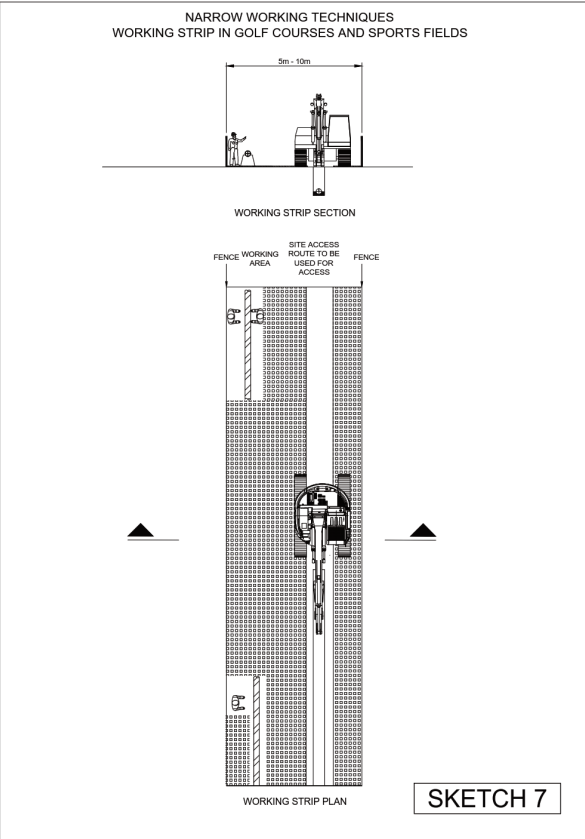
ExQ2	Question:	Applicant response to Question:
	<p>ii) How would this be secured in the dDCO [REP3-006].</p>	<p>14 of the draft DCO (Document Reference 3.1 (5)), and during the set up or shut down period should, for example, lighting, be required for safety reasons.</p>
<p>PC.2.3</p>	<p>For the Applicant: Respond to the concerns raised by Rushmoor Borough Council [REP3-041] that incorrect thresholds have been used with particular reference to Nash Close and if the incorrect thresholds have been used, provide an updated assessment and details of how this would affect the conclusions of that assessment.</p> <p>For Rushmoor Borough Council: Provide a response to the Applicant's response to Action Point 20 from the ISH on</p>	<p>1.1 The Applicant does not agree that the incorrect thresholds were used. This was an unsubstantiated claim made by Rushmoor Borough Council. The adopted criteria utilised by the Applicant are informed by the guidance provided in the Department of Environment advisory leaflet AL72 Noise control on building sites (Department of Environment, 1976). The categories described in AL72 are as follows:</p> <ul style="list-style-type: none"> • 70 dB(A) in rural, suburban and urban areas away from main road traffic and industrial noise; and • 75 dB(A) in urban areas near main roads and heavy industrial areas. <p>1.2 These categories and thresholds have their origins in the Wilson Committee Report on noise (Wilson Committee on the Problem of Noise, 1963), and are based on achieving a level of 55 dB(A) indoors, which was considered by the Wilson Committee to avoid interference with speech. The external level of 70 dB(A) was derived from the 55 dB(A) internal level plus a 15 dB difference between indoor and outdoor levels for closed but ill-fitting windows. The level of 75 dB(A) was recommended near main roads and heavy industrial areas as existing noise levels in these areas were considered likely to exceed 70 dB(A).</p> <p>1.3 Window design and specification is very different now to 1963, with the majority of properties now having well-fitting thermal double glazing as a minimum. The World Health Organization's Environmental Noise Guidelines for the European Region (WHO Regional Office for Europe, 2018) as well as former Planning Policy Guidance PPG24 (Department of the Environment, 1994) suggest that a difference between indoor and outdoor levels of 25 dB should be assumed for rooms with closed windows.</p>

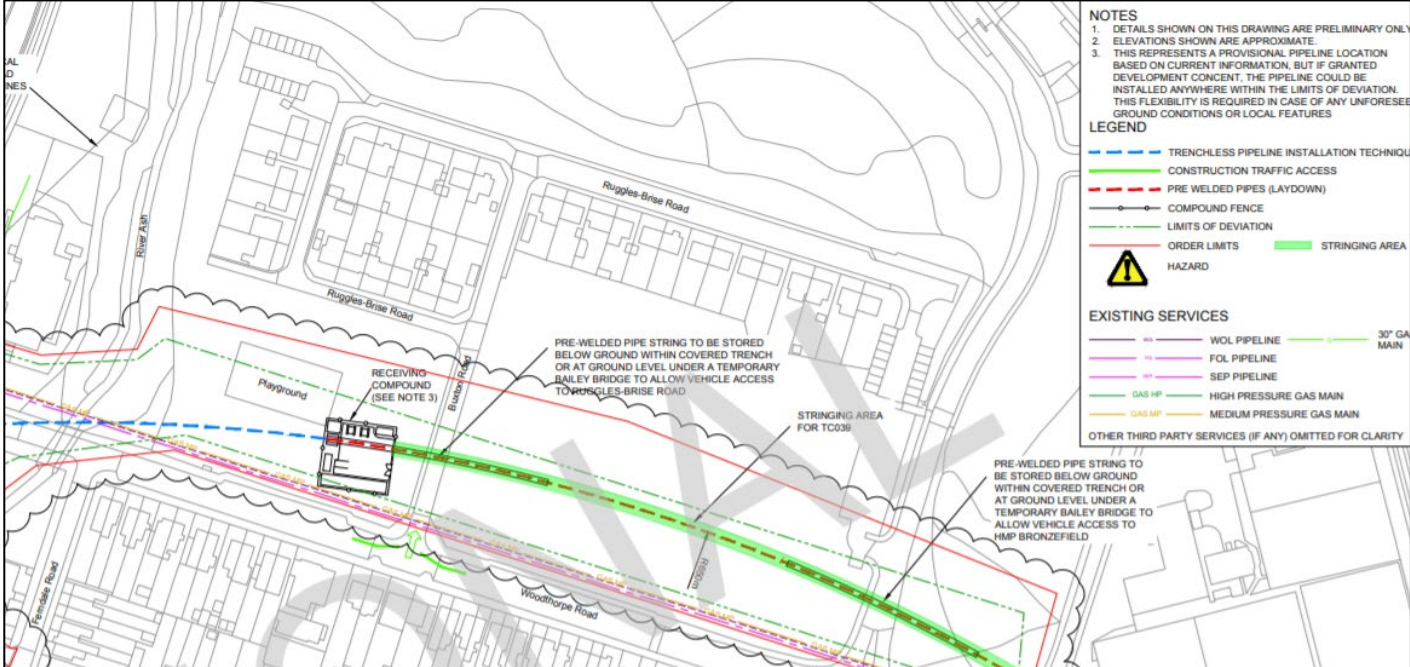


ExQ2	Question:	Applicant response to Question:
	<p>Wednesday 4 December 2019 [REP3-015].</p>	<p>1.4 In this context, the adoption of a significance threshold of 75 dB(A) for urban locations is considered to achieve the intent of the Wilson Committee, regardless of the proximity to main roads and heavy industrial areas and was correctly used in the Applicant’s assessment.</p> <p>1.5 In response to the representations made at the Issue Specific Hearing on Environmental Matters, the Applicant has revised the classification of receptors to ensure a more precautionary approach to the assessment. The threshold of significance for noise during installation of 70 dB(A) has now been adopted for all residential receptors.</p> <p>1.6 The updated assessment conclusions are presented in Revision 2.0 of Appendix 13.3 Noise and Vibration Technical Note Addendum, submitted at Deadline 4 (Document Reference 8.14(2)). The assessment concludes that that the revised threshold of significance would be exceeded at properties in 34 streets (including Nash Close), rather than the 10 streets covered by the original commitment. Acoustic barriers are therefore now included at additional locations, and this is reflected by the revisions to commitment G107 made at Deadline 4 - secured through DCO Requirement 6 (CEMP) included within the Outline CEMP. This was amended in the CoCP at Deadline 2 (REP2-010) and at Deadline 4 following discussions at the Issue Specific Hearings.</p>
<p>PC.2.4</p>	<p>i) Confirm that the Proposed Development would restrict the ‘breaking up’ of sports pitches at the end of the season [REP3-045, para 1.29].</p> <p>ii) Explain whether guarantees firmer than the proposed provisions in the CoCP or land agreements would be</p>	<p>1.1 In response to i), as verbally stated at the Issue Specific Hearing (4 December 2019, 11:53), the Applicant reaffirms its position that there is no restriction to the routine maintenance, rolling, tilling and the use of the land for sports above the pipeline. This includes “breaking up” as typically carried out at the end of a sports season. Under the draft Land Agreement, this activity is not prohibited. The relevant Clause in the Agreement states, ‘<i>The Grantor shall not without the prior written consent of the Company: (d) drill, dig or break up the land within the Easement Strip.</i>’ but that this restriction “<i>shall not prohibit the carrying out of normal agricultural operations within 600 millimetres of the surface of the Easement Strip.</i>” In the first instance the prior written consent would not be unreasonably withheld and allows for a review of the nature of the “breaking up” to ensure that the works are of a routine maintenance nature and enable a safe working methodology to be agreed. Where works are within 600mm of the surface then prior consent is not required. For the avoidance of doubt, the Applicant is happy to amend “normal agricultural operations” to</p>



ExQ2	Question:	Applicant response to Question:
	<p>necessary to ensure that playing fields would be restored and be able to be maintained by the Council to the appropriate standard [REP3-045, para 1.20]. Or</p> <p>iii) Revise the Outline CEMP [APP-129] to include confirmation that the Proposed Development would not prevent the ability to break up sports pitches.</p>	<p>“normal ground maintenance operations” in respect of sports pitches for any particular land agreement.</p> <p>1.2 The Applicant’s existing pipelines pass underneath many existing sports pitches. These pitches have been able to be routinely maintained and used for many years. The Applicant is not aware of any occasions where this hasn’t been the case as advocated by Mr Richard Turney at the same hearing. A review of the existing pipeline files highlighted one occasion (February 2016) relating to council-owned football pitches in Cove, Farnborough, where the landowner required the ground to be broken up in the close proximity of the existing pipeline to resolve a drainage issue in the corner of a football pitch. The Applicant was happy for the breaking up works to be carried out under the Applicant’s supervision (provided free of charge). The landowner decided not to proceed with the works and elected to realign the football pitch by 2m instead.</p> <p>1.3 Having regard to the response to i), the Applicant does not therefore consider that any further clarification is required in the CoCP or Outline CEMP.</p>

ExQ2	Question:	Applicant response to Question:
<p>PC.2.5</p>	<p>In response 10 [REP3-015] to action points from ISH on Wednesday 3 December 2019 [EV-010a and EV-010b] Figure 1.5 and accompanying text set out working in sports fields. The last bullet point says trench boxes or equivalent would be used to avoid side battered trenches. Sketch 7 in Appendix A relating to St. James School shows a battered side trench. Explain this apparent inconsistency.</p>	<p>1.1 Sketch 7 has been revised to show a vertical sided trench.</p> 

ExQ2	Question:	Applicant response to Question:
PC.2.6	<p>Provide an update on the progress over discussions regarding the relocation and reinstatement of the play area.</p>	<p>1.1 The Applicant submitted Crossing Drawings in the Deadline 3 submission (REP3-026). The drawing titled 'Provisional Ashford Plan & Section of A308 Staines Bypass Directional Drill TC039' provides detail on the location and type of construction activities within the Order Limits.</p> <p>1.2 As shown on the plan (provided below), the construction activities would avoid the Local Equipped Area for Play (LEAP) on Woodthorpe Road.</p>  <p>1.3 Should there be a change from this proposed arrangement that impacts on the LEAP on Woodthorpe Road, the Applicant would, through commitment OP07 in the CoCP - DCO Requirement 5 (Document Reference 6.4 Appendix 16.1 (3)), 'reinstatement the existing LEAP as soon as practicable after construction. The project would seek to provide an alternative LEAP for</p>



ExQ2	Question:	Applicant response to Question:
		<p><i>use while the existing LEAP is out of commission. The alternative LEAP would either be provided by the project within the Order Limits in the vicinity of the existing LEAP on land belonging to Spelthorne Borough Council or would be provided in collaboration with Spelthorne Borough Council in accordance with the details agreed.'</i> The Applicant is also content for this commitment to form part of the proposed land agreement. The details of the replacement equipment and design would be agreed in writing with the council prior to the closure and removal of any of the existing playground.</p> <p>1.4 The Applicant has engaged with the council to discuss this issue and has agreed the approach outlined above. This will be confirmed through the Statement of Common Ground agreed between the Applicant and Spelthorne Borough Council and submitted at Deadline 5.</p>



References

Department of Environment (1976). Advisory Leaflet 72 (AL72) Noise control on building sites. London: Her Majesty's Stationery Office.

Department of the Environment (1994). Planning Policy Guidance 24: Planning and Noise (PPG24). London: The Stationery Office.

Wilson Committee on the Problem of Noise (1963). Noise, Final Report. London: Her Majesty's Stationery Office.

World Health Organization Regional Office for Europe (2018). Environmental Noise Guidelines for the European Region. Copenhagen: WHO Regional Office for Europe.