

# Southampton to London Pipeline Project

## Deadline 4

Responses to ExA's Further Written Questions -  
Turf Hill (TH)

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**Southampton to London Pipeline Project  
Response to the Examining Authority's Further Written Questions – Turf  
Hill (TH)**



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# 1 Response to the Examining Authority's Further Written Questions – Turf Hill (TH)

Table 1.1: Applicant response to Question

ExQ2	Question:	Applicant response to Question:
TH.2.1	<p>Provide a response to the corporate position and comments made by Surrey Heath Borough Council in its response at D3 [REP3-048] regarding the route options at Turf Hill, with particular reference to the preference for route F1a as opposed to F1c.</p>	<p>1.1 The Applicant has found the Officers of Surrey Heath Borough Council to be professional and engaged with the project, providing useful insights in multiple meetings since January 2018.</p> <p>1.2 The draft Statement of Common Ground with Surrey Heath Borough Council (<a href="#">REP2-035</a>) has, at Annex C, the Council's response to the Preferred Route Consultation. This 'generally welcomed' the approach of the Applicant. The response made no further reference to the Turf Hill area, or indeed any reference to the St Catherines Road SANG (Clewborough). The response is signed by both the Leader and Chief Executive of the Council. The Applicant was therefore entitled to assume that the response represented the 'corporate position' of the Council.</p> <p>1.3 The Applicant has read the submission of Surrey Heath Borough Council (<a href="#">REP3-048</a>) and are of the view that the document is more a statement of questions or requests for information than a clear 'corporate position'. In particular, it does not fully address Action 30 from the Issue Specific Hearing on 3 December 2019 which seeks a comparison of two route alternatives. The Council appears to be requesting more information before taking a view, as per the following statement, until <i>'more details are provided in respect to likely tree loss on Turf Hill and in other areas is fully established, it is difficult.... to fully understand and evaluate the potential impacts'</i>.</p> <p>1.4 The Applicant would highlight the Development Consent Order process requires an Environmental Statement that assesses the worst-case scenario for impacts (including vegetation removal and traffic).</p> <p>1.5 Given the extensive and productive engagement between both parties to date, the Applicant hopes the Site Specific Plan (<b>Document Reference 8.58</b>) reassures the Council regarding how construction would be undertaken in the Turf Hill area.</p>



ExQ2	Question:	Applicant response to Question:
		<p>1.6 The Applicant would note the previous submissions and discussions with Council officers regarding flooding in Turf Hill and would welcome detailed questions from the Council on this matter if there are still outstanding concerns.</p> <p>1.7 The Applicant further notes that there appears to be selective referencing to the Management Plan for Turf Hill; text that is about compartment 7 (the far western area) should not be applied to the whole site, which has an overarching objective of 'Remove trees and scrub from all compartments as required'.</p>
<p><b>TH.2.2</b></p>	<p><b>The ExA notes the Applicant written response to D3 [REP3-012] and in respect of Action Point 32 from [REP3-013] in respect to how route F1a was decided. Nevertheless, the ExA considers that greater clarity of the methodology it adopted in balancing conflicting considerations is required.</b></p> <p><b>i) Explain how the views of NE, Surrey Heath Borough Council's Open</b></p>	<p>1.1 In response to i), in considering the route selection in this area, the Applicant visited the site with representatives of the organisations noted and discussed the project options (F1a and F1c) including the proposed construction methodology (Open Cut). None of the parties expressed the view that F1c should be chosen over F1a.</p> <ul style="list-style-type: none"> <li>• Natural England and Surrey Wildlife Trust stated at the on-site meeting held on 24 July 2018 that the habitat is suitable for SPA birds, notably Dartford Warbler; natural regeneration of heathland was favoured; the proposals had taken into account their early engagement comments and supported that Folly Bog would be avoided by following an alignment in Red Road; it was agreed that there would be enhancement opportunities in the form of scrub management although this would need to be discussed further with the Council; the proposal for the construction compound in the wooded area off Guildford Road was discussed and agreed, and that the loss of these pine trees would not affect the SSSI; the northern alignment (F1a) would be unlikely to adversely affect the SSSI or SPA birds; and therefore there is a potential for summer works in this area.</li> <li>• The Surrey Heath Open Space Officer acknowledged at the on-site meeting held on 26 September 2018 that it was likely that there would be an impact on trees; there are several non-native invasive plant species around the margins of the site and control of these plants</li> </ul>



ExQ2	Question:	Applicant response to Question:
	<p><b>Space Officer and SWT were assessed.</b></p> <p><b>ii) Explain how consultation responses and the proximity to residential properties, which is set out as a consideration in paragraphs 2.19.7 – 2.19.10 of NPS EN-4, were weighed into the decision process.</b></p> <p><b>iii) Explain whether the balancing exercise included consideration of the potential impact of tree removal alongside Guildford Road and the impact of Compound 5E on ecology or alternatively the traffic impact on Guildford Road. If not, why not.</b></p> <p><b>iv) Explain whether the balancing exercise took account of the</b></p>	<p>would be desirable; the removal of gorse and pine scrub would be desirable if the area were to be reinstated as heathland; the site compound off Guildford Road should be located in a drier area than the originally proposed location in wet heath; and natural regeneration was the preferred method of reinstatement. The Surrey Heath Open Space Officer confirmed his view after the route was selected.</p> <p>1.2 Given the site-specific and technical knowledge of the ecological features and processes within the Turf Hill unit of the SPA of these organisations, the Applicant has assessed its input to have significant weight when balancing the issues to determine the final selected route.</p> <p>1.3 In response to ii), the Applicant has sought to balance the competing policy guidance within paragraph 2.19.8 of EN-4, <i>‘When designing the route of new pipelines applicants should research relevant constraints including proximity of existing and planned residential properties, schools and hospitals, railway crossings, major road crossings, below surface usage and proximity to environmentally sensitive areas, main river and watercourse crossings. These can be undertaken by means of desk top studies in the first instance, followed up by consulting the appropriate authority, operator, or conservation body if necessary.’</i></p> <p>1.4 The Applicant undertook a desktop assessment and targeted site visits along all the proposed corridors prior to the corridor consultation. Preliminary environmental information, constraints such as current land uses and proposed allocations, were all plotted on a digital mapping tool. Following consultation, the Applicant developed the routing of the pipeline within the preferred corridor (Corridor J), leading to the identification of the three options in the Turf Hill Area (F1a, F1b and F1c) considered in the statutory consultation. In parallel, the Applicant engaged with Natural England, the Surrey Heath Open Space Officer (in his role as the Officer responsible for the management of Turf Hill) and Surrey Wildlife Trust. All this engagement, research, and consultation was considered in conjunction with the results of walkover surveys in determining the relative sensitivity of the ecological constraints with the residential constraints of each alternative route option.</p>

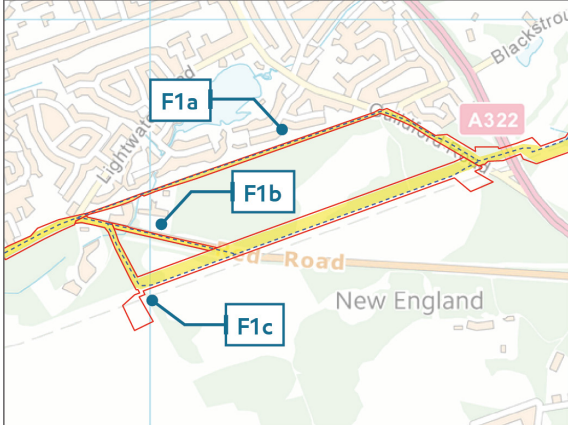


ExQ2	Question:	Applicant response to Question:
	<p><b>topography of the different alignments and construction costs? If these considerations were taken into account, how were they balanced. If not, why not.</b></p>	<p>1.5 The Applicant selected the route option that would have the least impact on European protected species or the heathland habitat which is optimal for ground nesting birds and sand lizards and is a route which avoids direct impact on residential properties.</p> <p>1.6 The route selected follows an existing Public Right of Way which has been used by other utility companies to install their below ground infrastructure (Affinity Water). The construction activity would be on public land and the impact for local residents would be temporary during construction works only.</p> <p>1.7 In response to iii), the balancing exercise did include the consideration of the potential impact of tree removal alongside Guildford Road. This area was subjected to the same survey effort and assessment as the rest of the alignment in Turf Hill.</p> <p>1.8 The Applicant carefully considered the location of the proposed construction compound on Guildford Road. This compound would support the works through Turf Hill and the trenchless crossing of the Lightwater Bypass (A322) (TC021). The location is away from residential properties. The site of the proposed compound off Guildford Road is primarily woodland and this vegetation is not optimal for ground nesting birds specifically. The creation of the construction compound would therefore result in the clearance of the woodland vegetation from this area, and once the works in Turf Hill were completed, the site would be cleared and left to regenerate naturally as additional heathland habitat which is optimal habitat for European protected species. In addition, the Applicant has had discussions with Surrey County Council Highways regarding the impacts of the works on Guildford Road. They have not raised any concerns about the Guildford Road compound location to date. Details of any site-specific measures would be agreed with the council as part of the Construction Traffic Management Plan secured by Requirement 7 of the draft DCO (<b>Document Reference 3.1(5)</b>).</p> <p>1.9 The Applicant has sought to carefully balance the construction needs of the project with the environmental and community constraints. The impacts have been assessed and reported in the</p>



ExQ2	Question:	Applicant response to Question:
		<p>ES and good practice measures secured to manage the impact of construction in this sensitive location.</p> <p>1.10 In response to iv), the Applicant took into account all the constraints including environmental designations, wet and dry habitat, relative elevation (i.e. topography), tree cover, land use, habitat and construction impacts including seasonal constraints. Using expert opinion and professional judgement and the advice set out in part i), the Applicant weighed up all these constraints and determined that option F1a should be preferred and form part of the application.</p>
<p><b>TH.2.3</b></p>	<p><b>In paragraph 3.57 of its response at D3 [REP3-012], the Applicant confirms that sub-options were presented for consultation in the majority of sites.</b></p> <p><b>i) Explain whether in the case of Turf Hill, the sub-option was an indication that the considerations were finely balanced.</b></p> <p><b>ii) In view of the availability to the Applicant of the Surrey Amphibian and Reptile Report on sand lizards at Turf Hill in August 2018</b></p>	<p>1.1 In response to i), the Applicant presented three sub-options at Turf Hill during the Preferred Route (first statutory) Consultation in September/October 2018. Sub-options were presented due to the complexity of the area, particularly in regard to environmental constraints and community impacts. The Applicant consulted on route options in this area to seek consultee feedback to inform its decision, rather than presenting a single option only based on the local designation.</p> <p>1.2 The diagram below is taken from the Preferred Route Consultation Brochure (Appendix 5.1 of the Consultation Report (<b>Additional Submission <a href="#">AS-012</a></b>)) and shows the three sub-options presented.</p>



ExQ2	Question:	Applicant response to Question:
	<p>and the views of Natural England's reptile specialist from October 2018, explain why the Design Refinements Consultation in January 2019 included option F1c.</p>	 <p>1.3 The route of sub-option F1a follows a well-used footpath that is very narrow in places and would lead to the removal of trees. It also borders properties along Heronscourt and Colville Gardens.</p> <p>1.4 The route of sub-options F1b and F1c pass through an area of sensitive wet heathland habitats and protected species, including reptiles and amphibians, and a Biodiversity Opportunity Area where habitats can be created. F1b also travels along a section of Red Road, which would likely have significant traffic impacts.</p> <p>1.5 The Applicant sought to balance these constraints when selecting a final route, and this reasoning is outlined in more detail in the Applicant's response to the ExA's First Written Questions (section TH.1.5 in <a href="#">REP2-049</a>).</p> <p>1.6 In response to ii), to confirm, it was at the Design Refinements (second statutory) Consultation that the sub-option selection was announced. At this stage, F1c was not part of the route and the amended F1a+ route had been selected.</p>





ExQ2	Question:	Applicant response to Question:
<p><b>TH.2.4</b></p>	<p><b>On Sheet 105 of Alignment Sheets (narrow working) (3 of 3) submitted at D3 [REP3-025] the proposed pipeline centreline is shown as generally to the southern part of the bridleway.</b></p> <p><b>Notwithstanding that the alignment may be provisional, comment on its effects on trees to the south of the bridleway.</b></p>	<p>1.1 The intended alignment through Turf Hill is shown in the Turf Hill Site Specific Plan (<b>Document Reference 8.58</b>), which also includes the results of the arboricultural survey.</p> <p>1.2 Behind the properties of Heronscourt and Colville Gardens, the intended pipeline alignment is principally south of the track, and it is anticipated that this would require the removal of approximately 17 of the surveyed trees as shown in the Site Specific Plan.</p>
<p><b>TH.2.5</b></p>	<p><b>In paragraphs 3.42 and 3.43 of its response to D3 [REP3-012], the Applicant sets out the environmental designations at Turf Hill.</b></p> <p><b>Whilst recognising the general characteristics and locations of woodland and</b></p>	<p>1.1 Turf Hill is a component part of the Colony Bog and Bagshot Heath Site of Special Scientific Interest (SSSI), the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) and Thames Basin Heaths Special Protection Area (SPA).</p> <p>1.2 Turf Hill specifically supports two qualifying habitats of the SAC: Northern Atlantic wet heaths with <i>Erica tetralix</i> and European dry heaths.</p> <p>1.3 The habitats at Turf Hill, which include the F1a+ and F1c route options, are discussed in ES Appendix 7.1 Habitats and Botany Factual Report (<b>Application Document <a href="#">APP-080</a></b>), paragraphs 3.2.389 to 3.2.39, and are mapped in Figure A7.1.147 of the same report (<b>Application Document <a href="#">APP-081</a></b>). Additional detail on the presence and extent of Priority Habitats present at</p>



ExQ2	Question:	Applicant response to Question:
	<p>heathland, comment on the specific characteristics including the ecological value of the proposed pipeline alignment (F1a+) and the previously considered option (F1c).</p>	<p>Turf Hill are shown in Figure A7.1.148 Sheet 4 of 4 and the presence of related Annex I habitats are detailed in Figure A7.1.149 Sheet 4 of 4.</p> <p>1.4 The F1a+ route option comprises Scots pine woodland in its entirety with significant amounts of the invasive species <i>Gaultheria</i>. In addition, there is a well-worn public path which accounts for a significant percentage of the F1a+ Order Limits. The F1c option is far more diverse, comprising acid dry dwarf shrub heath and wet dwarf shrub heath which are Annex I habitats (listed within the Habitats Directive 1992 (Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora)), with linear strips of scrub dominated by common gorse along bare ground used as access tracks. When the habitats of the two route options are compared in terms of ecological value, the F1a route option is far lower.</p> <p>1.5 As a component of the Thames Basin Heaths SPA, Turf Hill is also designated for the bird species nightjar, woodlark and Dartford warbler. These species are ground nesting heathland specialists which is reflected in their breeding location records shown in Figures C7, Figure C8 and Figure C9 in the Habitats Regulations Assessment Report (<b>Application Documents <a href="#">APP-130</a> and <a href="#">APP-131</a></b>). These figures show that while breeding has been recorded in or near the heathland habitats of the F1c option, they have not been recorded in the coniferous woodland habitat of option F1a+.</p> <p>1.6 In conclusion, the habitats within the Order Limits of the F1c option comprise Annex I habitats that are internationally important and support breeding qualifying bird species, whereas the conifer woodland within the Order Limits of the F1a+ route option, although located within the international designation, is not a qualifying feature of the SAC, does not directly support breeding habitat of the qualifying bird species of the SPA and is of much lower ecological value than the Annex I heathland habitats.</p>



ExQ2	Question:	Applicant response to Question:
<p><b>TH.2.6</b></p>	<p><b>In its response to Action 34 at D3 [REP3-013], the Applicant indicates that different ecological baseline situations occur at Turf Hill and Chobham Common. The Applicant's response also makes reference to the Reptile Factual Report [APP-092] but is largely based on assertion rather than evidence.</b></p> <p><b>Demonstrate, with reference to evidence, how the two situations differ and therefore led to different approaches being proposed. In addition, explain why the required mitigation at Turf Hill which would prevent public access for a minimum of two months prior to vegetation removal or</b></p>	<p>1.1 For clarity, it is assumed that the 'ecological baseline' being queried here relates to reptiles and specifically sand lizard as discussed in the response to Action 34 at Deadline 3 (<a href="#">REP3-013</a>). The Applicant maintains that it considers its approach to sand lizards across the project to be consistent.</p> <p>1.2 Habitat (<a href="#">Application Document APP-080</a>) and reptile suitability habitat surveys (<a href="#">Application Document APP-092</a>) were undertaken at Turf Hill and at Chobham Common using the same methodology at each site. The surveys were undertaken by highly experienced ecologists comprising a vice county deputy recorder for plants and Natural England's national sand lizard specialist Paul Edgar, respectively. The results of the habitat survey are a direct result of the plant communities recorded, while the reptile habitat results are based on best practice guidance and years of professional experience.</p> <p>1.3 As the Reptile Factual Report (<a href="#">Application Document APP-092</a>) shows, the habitat in the F1c option across the centre of Turf Hill was identified as being entirely high suitability habitat, and therefore has a high potential for sand lizard. Sand lizard are particularly important ecological features due to their national rarity and their legal protection under both European and national legislation. This legal protection also makes it an offence to damage or destroy their habitat. The presence of sand lizard within the high suitability habitat within the Order Limits of the F1c option is considered highly likely due to its proximity to the release site and is supported with recorded presence of sand lizard in May 2019 immediately adjacent to this location, south of the access track.</p> <p>1.4 At Chobham Common, the habitat within the Order Limits was assessed as being, in the main, of moderate potential to support sand lizard with minor isolated areas of high potential. This difference in baseline conditions is reflected in the mitigation necessary and the different approach at the two sites. While a trapping and translocation programme would be required for Option F1c at Turf Hill, this would not be required for the F1a+ option. The mitigation for habitats of moderate reptile potential at Chobham Common would involve habitat manipulation only – a considerably</p>



ExQ2	Question:	Applicant response to Question:
	<p>construction, be unacceptable when construction activities generally, including for option F1a+ take up to 2 years.</p>	<p>quicker and less disruptive process that could be completed in approximately one week versus the two-month minimum required at the F1c option.</p> <p>1.5 The Applicant does not recognise the statement that the additional time for sand lizard mitigation work at Turf Hill would be 'unacceptable' and has not expressed that opinion.</p> <p>1.6 The statement in the response to Action 34 at Deadline 3 (<a href="#">REP3-013</a>) was to highlight that, in addition to the time taken to install the pipeline, for the F1c option an additional minimum period would be required for translocation which is not required for the F1a option. Furthermore, if the reptile exclusion fence is subject to damage (which is not uncommon in public places) this period could be greatly extended as the translocation period would have to restart.</p> <p>1.7 Equally, the Applicant does not recognise that the '<i>construction activities generally ... take up to 2 years</i>'. The construction activities for options F1a or F1c would not be expected to take approximately 4months..</p>
<p>TH.2.7</p>	<p>Map 6 of the Turf Hill Park Management Plan (Appendix 8 of <a href="#">[REP3-013]</a>) shows the sand lizard release area and breeding area in compartment 6. This is separate from compartment 2 which comprises dry heathland with wooded blocks and extends</p>	<p>1.1 The Applicant has not been involved in the release of sand lizards at Turf Hill but believes that it is the intention of the release programme for sand lizards to recolonise large areas of the SSSI. This appears to be supported by the Surrey Heath Turf Hill Management Plan (Surrey Heath Borough Council, 2015) (presented in Appendix 8 of <a href="#">(REP3-013)</a>). Appendix 3 of that document, "Turf Hill Sand Lizard Re-Introduction Project", states that, '<i>to complement these specialist works the ongoing management to maintain a heathland mosaic of trees, scrub and heathers would continue across the whole site</i>'. This indicates that the management of the whole of Turf Hill would complement the sand lizard re-introduction programme.</p> <p>1.2 It is not clear why the ExA has highlighted the issue of four-year cycle cutting. The objective of the cutting regime appears to be to prevent tree growth beneath the power cables. However, regular cutting of heathland is a common practice across the SPA, is compatible with reptiles such as</p>

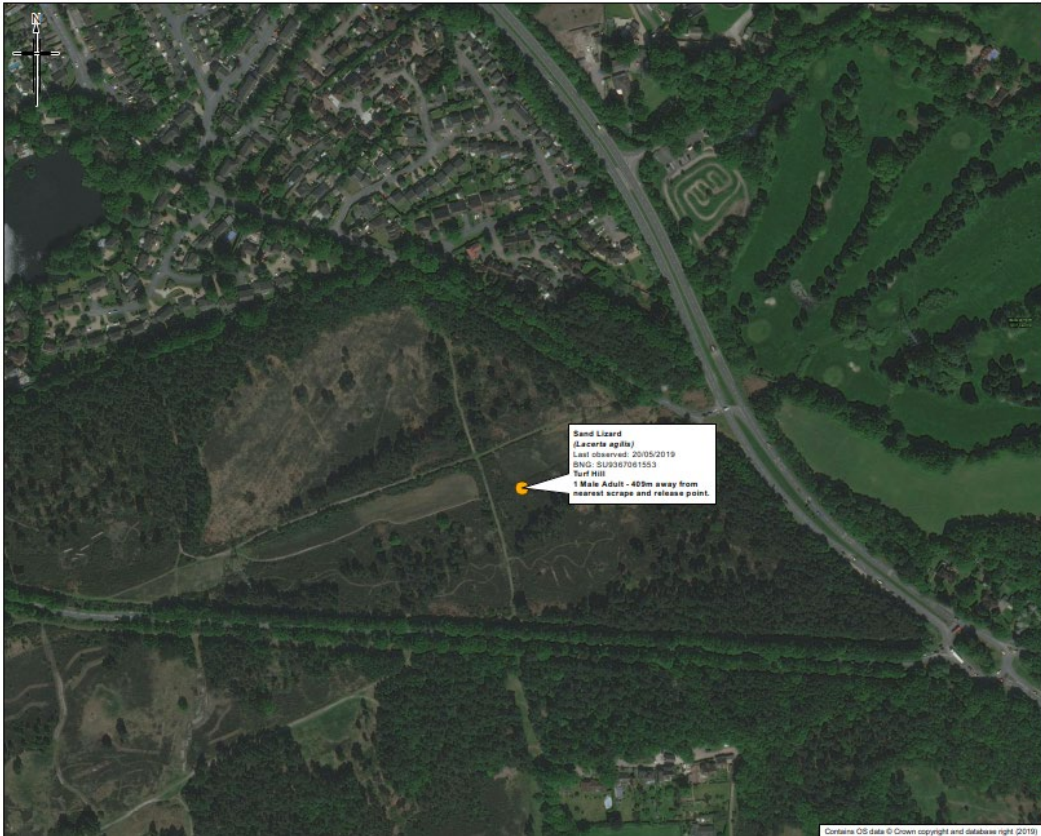


ExQ2	Question:	Applicant response to Question:
	<p>along the route of the pylons / option F1c.</p> <p>Compartment 2 is described as differing “from the other areas of dry heathland on site being linear in shape and regularly cut on a 4-year cycle since 1994. Situated beneath the high-power cables that cross the site this compartment was, prior to 1994, cut on an ad-hoc basis by National Grid in order to keep the power cables free of trees”.</p> <p>i) Explain whether Sand Lizards that were reintroduced to Turf Hill likely to have remained in or close to the original release area or will they have spread out from the original release site and if they have how far are</p>	<p>sand lizard (unlike pipeline installation) and helps to maintain a healthy mixed age population of heathland plants. Reference to cutting and mowing can be found in the Surrey Heath Turf Hill Management Plan (Surrey Heath Borough Council, 2015) as this helps maintain the heathland habitat favoured by sand lizard.</p> <p>1.3 In response to i), the sand lizard release site is monitored regularly by the Surrey Amphibian and Reptile Group (SARG). The most recent records of sand lizard recorded adult female and juvenile individuals in September 2019, showing that the population is still present and breeding at the original release site. SARG’s records of sand lizard in May 2019 also indicate that they have already spread out from the release site and have travelled over 400m, which is a significant distance for a reptile. (See sketch maps below).</p> <p>1.4 In response to ii), the Applicant would like to clarify that option F1c is almost entirely outside Compartment 2. Compartment 2 is the area beneath the HV power lines and subject to the four-year cycle cutting to prevent tree growth beneath the power lines. F1c occupies the largely heathland habitat to the north of Compartment 2 due to the restrictions of working under or close to the power lines.</p> <p>1.5 The SARG data show that sand lizard have dispersed from the original release site and utilised the habitat within F1c and Compartment 2 having crossed the well-used path.</p> <p>1.6 The habitat along F1c has been assessed as being highly suitable for sand lizard, and this is explained in ES Appendix 7.11: Reptile Factual Report (<b>Application Document <a href="#">APP-092</a></b>).</p> <p>1.7 Therefore, combined with the SARG records, the Applicant believes the ExA’s suggestion, ‘<i>that route F1c is as unsuitable for sand lizards as other parts of Turf Hill including the proposed route option</i>’ is incorrect.</p>



ExQ2	Question:	Applicant response to Question:
	<p>they likely to have moved.</p> <p>ii) Explain whether the above indicates that route F1C is as unsuitable for sand lizards as other parts of Turf Hill including the proposed route option.</p>	



ExQ2	Question:	Applicant response to Question:
		



## **References**

Surrey Heath Borough Council (2015). Turf Hill Park West End Management Plan 2015 – 2025.