

Southampton to London Pipeline Project

Deadline 4

Responses to ExA's Further Written Questions -
Suitable Alternative Natural Greenspaces (SANGS)

Application Document: 8.44

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**Southampton to London Pipeline Project
Response to the Examining Authority's Further Written Questions –
Suitable Alternative Natural Greenspaces (SANG)**



Contents

1 Response to the Examining Authority's Further Written Questions – Suitable Alternative Natural Greenspace (SANG)



1 Response to the Examining Authority's Further Written Questions –SANG

Table 1.1: Applicant response to Questions

ExQ2	Question:	Applicant response to Question:
<p>SANG 2.1</p>	<p>A SANG should be “natural as possible; free from noise, lighting, smells and visual intrusion; have unfettered access throughout the site with the ability of dogs to be let of the lead and a minimum 2.4km circular walking route that starts/ends at a car park”.</p> <p>i) What measures/controls are proposed to ensure that these attributes would be maintained in those SANGs through which the Proposed Development would run and/or where a construction compound would be located.</p>	<p>1.2 The Applicant does not accept this as a definition of the characteristics of a SANG, which it believes is derived from paragraph 2.1.3 of the Written Representation from Rushmoor Borough Council (REP2-081).</p> <p>1.3 Relevant guidance can be found using the links within this document and reproduced below. Surrey Heath Borough Council and Rushmoor Borough Council both published in 2019 an SPA Mitigation Strategy which contains, at Appendix 2, identical guidelines for the creation of SANGs. The Surrey Heath document has been adopted as a Supplementary Planning Document. The status of the Rushmoor document is less clear. Both documents are up to date and both stress that the wording is precise, so it is surprising that the published guidance has been inaccurately reproduced in this question.</p> <p>1.4 The Applicant sets out below the text from the documents:</p> <p><i>‘The wording in the list below is precise. The requirements referred to as “must” are essential in all SANGs. Those requirements listed as “should have” should all be represented within the suite of SANGs, but do not all have to be represented in every site. All SANGs should have at least one of the features on the “desirable” list.</i></p> <p>Must have</p> <ul style="list-style-type: none"> • <i>For all sites larger than 4ha there must be adequate parking for visitors, unless the site is intended for local use, i.e. within easy walking distance (400m) of the developments linked to it.</i> • <i>It should include a circular walk of 2.3-2.5km around the SANGS. On sites with car parks this should start and finish there.</i> • <i>Sites of 10ha or more must have adequate car parking. These should be clearly signposted and easily accessed. Car parks must be easily and safely accessible by car and should be clearly sign posted.</i>



ExQ2	Question:	Applicant response to Question:
	<p>ii) Explain how they would be secured.</p>	<ul style="list-style-type: none"> • <i>The accessibility of the site must include access points appropriate for the particular visitor use the SANGs is intended to cater for.</i> • <i>The SANGS must have a safe route of access on foot from the nearest car park and/or footpath/s.</i> • <i>SANGS must be designed so that they are perceived to be safe by users; they must not have tree and scrub cover along parts of the walking routes.</i> • <i>Paths must be easily used and well maintained but most should remain unsurfaced to avoid the site becoming too urban in feel.</i> • <i>SANGS must be perceived as semi-natural spaces with little intrusion of artificial structures, except in the immediate vicinity of car parks. Visually-sensitive way-markers and some benches are acceptable.</i> • <i>All SANGS larger than 12 ha must aim to provide a variety of habitats for users to experience.</i> • <i>Access within the SANGs must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.</i> • <i>SANGS must be free from unpleasant intrusions (e.g. sewage treatment works smells etc).</i> <p>Should haves</p> <ul style="list-style-type: none"> • <i>SANGS should be clearly sign-posted or advertised in some way.</i> • <i>SANGS should have leaflets and/or websites advertising their location to potential users. It would be desirable for leaflets to be distributed to new homes in the area and be made available at entrance points and car parks.</i> • <i>SANGS should link into longer walks of 5km or more through footpath or other green networks.</i> <p>Desirables</p> <ul style="list-style-type: none"> • <i>It would be desirable for an owner to be able to take dogs from the car park to the SANGS safely off the lead.</i> • <i>Where possible it is desirable to choose sites with a gently undulating topography for SANGS.</i> • <i>It is desirable for access points to have signage outlining the layout of the SANGS and the routes available to visitors.</i>



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		<ul style="list-style-type: none"> • <i>It is desirable that SANGS provide a natural space with areas of open (non-wooded) countryside and areas of dense and scattered trees and shrubs. The provision of open water on part, but not the majority of sites is desirable.</i> • <i>Where possible it is desirable to have a focal point such as a view point, monument etc within the SANGS.</i> • <i>Larger SANGS or those grouped close together should aim to provide longer walks of 5km or more.</i> • <i>Design and management of the SANG should contribute to relevant Biodiversity Opportunity Area Priority habitat restoration/ creation objectives, where appropriate.'</i> <p>1.5 The Applicant considers below which of the criteria in the question appear in the Councils' 2019 guidance.</p> <ol style="list-style-type: none"> 1) "Natural as possible". The guidance gives the test as '<i>must be perceived as semi-natural spaces with little intrusion of artificial structures</i>'. 2) "Free from noise". Subject to 4) below, this is not in the guidance. 3) "Free from lighting". Subject to 4) below, this is not in the guidance. 4) "Free from smells". The guidance says SANGS '<i>must be free from unpleasant intrusions (e.g. sewage treatment works smells etc.</i>' Given the wording of the guidance is intended to be precise, the Applicant believes that if 'intrusion' was intended to include noise and lighting it would have said so. 5) "Free from visual intrusion". The guidance says SANGS must have '<i>little intrusion of artificial structures, except in the immediate vicinity of car parks</i>'. 6) "Have unfettered access throughout the site with the ability of dogs to be let of the lead". The guidance says, '<i>Access within the SANGs must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead</i>'. The Applicant would stress that the guidance does not use the word 'unfettered'



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		<p>7) “a minimum 2.4km circular walking route that starts/ends at a car park”. The guidance says, ‘It should include a circular walk of 2.3-2.5km around the SANGS. On sites with car parks this should start and finish there’.</p> <p>1.6 The Applicant will address the question as if it were directed at points 1), 4), 5), 6) and 7) as worded in the guidance.</p> <table border="1" data-bbox="689 600 2130 1498"> <thead> <tr> <th data-bbox="689 600 1167 644">Criteria</th> <th data-bbox="1167 600 1644 644">Measures/controls</th> <th data-bbox="1644 600 2130 644">Securing mechanism</th> </tr> </thead> <tbody> <tr> <td data-bbox="689 644 1167 970">Must be perceived as semi-natural spaces with little intrusion of artificial structures.</td> <td data-bbox="1167 644 1644 970"> <p>There are no Above Ground Installations (AGI) proposed in any SANG. The temporary use of land for construction compounds could be considered as a structure that fall within the ambit of “little intrusion”.</p> <p>The temporary nature of the works is not expected to alter its semi-natural character.</p> </td> <td data-bbox="1644 644 2130 970">The Application design does not propose any AGI in SANG. The CoCP secures the removal of the compound.</td> </tr> <tr> <td data-bbox="689 970 1167 1098">Must be free from unpleasant intrusions (e.g. sewage treatment works smells etc.).</td> <td data-bbox="1167 970 1644 1098">The installation of a pipeline is not a process associated with generating any particular unpleasant odour.</td> <td data-bbox="1644 970 2130 1098">None</td> </tr> <tr> <td data-bbox="689 1098 1167 1321">Little intrusion of artificial structures, except in the immediate vicinity of car parks.</td> <td data-bbox="1167 1098 1644 1321">There are no Above Ground Installations (AGI) proposed in any SANG. The temporary use of land for construction compounds could be considered to as a structure that fall within the ambit of “little intrusion”.</td> <td data-bbox="1644 1098 2130 1321">The Application design does not propose any AGI in SANG. The CoCP secures the removal of the compound.</td> </tr> <tr> <td data-bbox="689 1321 1167 1498">Access within the SANGs must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.</td> <td data-bbox="1167 1321 1644 1498">The scale of the temporary construction activity together with the secure fencing of the working area would not impact on the ability to dog walkers to exercise their dogs off the</td> <td data-bbox="1644 1321 2130 1498">None</td> </tr> </tbody> </table>	Criteria	Measures/controls	Securing mechanism	Must be perceived as semi-natural spaces with little intrusion of artificial structures.	<p>There are no Above Ground Installations (AGI) proposed in any SANG. The temporary use of land for construction compounds could be considered as a structure that fall within the ambit of “little intrusion”.</p> <p>The temporary nature of the works is not expected to alter its semi-natural character.</p>	The Application design does not propose any AGI in SANG. The CoCP secures the removal of the compound.	Must be free from unpleasant intrusions (e.g. sewage treatment works smells etc.).	The installation of a pipeline is not a process associated with generating any particular unpleasant odour.	None	Little intrusion of artificial structures, except in the immediate vicinity of car parks.	There are no Above Ground Installations (AGI) proposed in any SANG. The temporary use of land for construction compounds could be considered to as a structure that fall within the ambit of “little intrusion”.	The Application design does not propose any AGI in SANG. The CoCP secures the removal of the compound.	Access within the SANGs must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.	The scale of the temporary construction activity together with the secure fencing of the working area would not impact on the ability to dog walkers to exercise their dogs off the	None
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		<p>It should include a circular walk of 2.3-2.5km around the SANGS. On sites with car parks this should start and finish there.</p>	<p>lead. The Applicant notes that this test is qualified.</p> <p>Commitment OP04 in the CoCP secures the circular walks are maintained and that if construction works conflicts with the footpath, a temporary diversion would be provided.</p>	<p>Commitment is secured through Requirement 5 of the draft DCO.</p>
<p>SANG 2.2</p>	<p>The Applicant acknowledged [REP3-020] the concerns of Surrey Heath Borough Council [RR-093] [REP2-091] about the potential adverse effects on the integrity of the TBH SPA arising from construction activity on both of the Borough's SANGs (St Catherines Road and Windlemere) simultaneously.</p> <p>REAC Measure OP04 indicates that principal pedestrian routes within SANGs would be</p>	<p>1.1 The response to this question relies on three paragraphs from the HRA Report (Application Document APP-130). For ease of reference, these are reproduced below.</p> <p>1.2 Paragraph 2.6.2 states, 'Works to install and commission the pipeline are expected to start from grant of DCO and be completed early 2023. Certain advance works may take place prior to development consent where consented under alternative regimes, for example, the Town and Country Planning Act 1990'. Allowing a 3-4 month period to discharge requirements leaves a two year construction period. Paragraph 5.8.12 indicates that 'Recreational disturbance impacts are pertinent during the breeding season only (1 February to 30 September). As there would be no seasonal constraints to construction works within SANGs, this study has assumed a 'worst case' scenario whereby all construction works within SANG sites would be undertaken between February and 30 September. This period includes the time when recreational activities are likely to be at their peak i.e. during the late spring and summer'.</p> <p>1.3 Paragraph 5.8.13 states 'Construction activity would take place at multiple 'work fronts' and could theoretically affect all SANGs simultaneously or consecutively. Scenarios relating to both maximum displacement intensity (assuming concurrent working) and maximum duration of displacement (assuming consecutive working) have been considered.' Furthermore we would expect paths to be closed for no more than a few hours/few days.</p>		



ExQ2	Question:	Applicant response to Question:
	<p>managed with access only closed for short periods. The Applicant has stated that it is too early to make a commitment about the schedule of construction activity, as the Applicant is yet to appoint a contractor and define the phasing for installation.</p> <p>With reference to the HRA report, confirm how the it has concluded:</p> <p>i) That there would be no impact on the TBH SPA when it has not confirmed when the works within SANGs would take place.</p> <p>ii) How long it would be working in each SANG and whether or not works would be undertaken concurrently or consecutively.</p> <p>iii) What assumptions has the Applicant</p>	<p>1.4 In response to i), the Applicant has concluded that there would be no impact on the TBH SPA even though it is not yet confirmed when the works within the SANGs will take place, firstly because (as noted in paragraph 2.6.2 of the HRA) the time period for construction is limited to two years, and secondly because (as set out in paragraph 5.8.12), the HRA Report considers a ‘worst scenario’ of construction in the SANGs taking place between February and 30 September. This means the conclusions of the HRA Report are robust in any eventuality.</p> <p>1.5 In response to ii), the HRA Report has considered (as stated in paragraph 5.8.13) the greatest impact scenarios of multiple ‘work fronts’ that could theoretically affect all SANGs simultaneously or consecutively. As set out in i) above, the maximum time period to be working in each SANG is two years but, in reality, is very likely to be less.</p> <p>1.6 In response to iii), as set out in paragraph 5.8.13 of the HRA Report, the Applicant has assessed scenarios relating to maximum displacement intensity and maximum duration of displacement. The maximum duration is two years.</p> <p>1.7 In response to iv), as stated above, the maximum time period of works in the SANG is two years. The short duration referred to in the HRA Report, for example at paragraph 5.8.18, highlights that in practice, having regard to the construction techniques employed, the actual duration would be significantly less than two years. The use of the word temporary in the HRA Report is to signify that the works have a limited time period, and that a position is not ‘permanent’.</p> <p>1.8 In response to v), the limits set out above are secured through the updated Code of Construction Practice submitted at Deadline 4 (Document Reference 6.4 Appendix 16.1 (3)), which includes the following text:</p> <p><i>‘Construction works in the SANGs will be limited to a maximum of two years in duration. This will run from the commencement of any fencing activity or other works that deny access to any part of the SANG to members of the public. Esso will provide advance written notice to the relevant planning authority of the commencement date.</i></p> <p><i>All construction activities within the SANG will be fully demobilised within the two years period and reinstatement completed with all protective fencing removed. When planning reinstatement of the SANG, Esso will consult with the relevant planning authority over the timetable for reinstatement</i></p>



ExQ2	Question:	Applicant response to Question:
	<p>applied to the HRA in terms of timings and duration of works in SANGs.</p> <p>iv) What is meant by short duration and temporary.</p> <p>v) How would this be secured.</p>	<p><i>taking account of ecological good practice and recognising that it may be appropriate to defer replanting and reseeding/turfing to take advantage of optimum growing seasons and conditions. In such circumstances, and only with the agreement of the relevant planning authority, it may be appropriate to extend reinstatement and maintain protective fencing beyond the two year deadline. Where operating under such an extension, Esso would make sure that all affected paths and circular walks are restored to their original condition and available for public use and any protective fencing required would be the minimum necessary taking account of the nature of the replanting.'</i></p>
<p>SANG 2.5</p>	<p>In its response to D2, Surrey Heath Borough Council [REP2-092] stated that two additional Requirements would be necessary requiring alternative SANGs to be provided and a scheme for the management of works in open land. In its response at D3 [REP3-010], the Applicant states that a) it does not consider that any evidence has been provided regarding impacts on St Catherines Road SANG which would require an</p>	<p>1.1 The Applicant notes that the position of Surrey Heath Borough Council has not been supported by Natural England.</p> <p>1.2 As noted in the response to written question SANG 2.2, the updated version of the Code of Construction Practice (CoCP) submitted at Deadline 4 (Document Reference 6.4 Appendix 16.1 (3)) includes a commitment which limits the period of work within SANGs to two years. A Site Specific Plan for St Catherines Road SANG (Clewborough) is also submitted at Deadline 4 (Document Reference 8.61) which also reflects this two-year limit.</p> <p>1.3 The Applicant considers that this commitment, combined with the limited extent of construction works within St Catherines Road SANG, the small number of dwellings which the SANG supports and the SANG's close proximity to alternative green space (located outside the Thames Basin Heaths SPA) which is capable of absorbing any small amount of recreational displacement for the short duration of construction, adequately manage the effects of construction on St Catherines Road SANG.</p> <p>1.4 Compliance with the CoCP is secured by Requirement 5 of the draft DCO (Document Reference 3.1(5)). The CoCP would be a document certified by the Secretary of State for the purposes of this Order. The Site Specific Plan is also secured by Requirement 17 of the draft DCO.</p>

**Southampton to London Pipeline Project
 Response to the Examining Authority's Further Written Questions –
 Suitable Alternative Natural Greenspaces (SANG)**



ExQ2	Question:	Applicant response to Question:
	<p>alternative SANG to be provided, and b) that it does not agree there is a need for a Requirement dealing with the management of works in open space and further details on how construction would be managed will be provided as part of the updated CoCP to be submitted at D4.</p> <p>Update the ExA as to the progress and content contained within the CoCP and whether it would adequately manage the St Catherines Road SANG during construction of the Proposed Development.</p>	



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<p>SANG.2.6</p>	<p>The ExA note that the Applicant does not agree [REP3-010] that there is a need for a Requirement dealing with working in a SANG as this would be managed through the updated CoCP due to be submitted at D4. However, the Applicant is proposing to limit construction works within Southwood Country Park to two years.</p> <p>For the Applicant:</p> <p>i) Justify the decision to limit construction activities to a two-year period.</p> <p>ii) At the ISH held on Wednesday 27 November 2019 [EV-</p>	<p>1.1 In response to (i), the works are to be limited to two years in all SANGs impacted by the proposed pipeline because the Applicant is confident that the construction of the pipeline can be completed in a two-year period. Further, the impacts of such construction period have been the subject of assessment in the Habitats Regulations Assessment (HRA) Report (Application Documents APP-130 and APP-131). The basis for the HRA Report is outlined in Section 2.6 (Construction sequencing, programme and methods) which states, '<i>Works to install and commission the pipeline are expected to start from grant of DCO and be completed early 2023.</i>' Recreational disturbance impacts are pertinent during the breeding season only. Therefore, the Applicant has assessed on the basis that construction could take place over two breeding seasons from 1 February to 30 September. Similarly, the assessment in ES Chapter 7: Biodiversity (Application Document APP-047) is based on a construction period of two years (see, e.g., paragraph 7.5.769).</p> <p>1.2 For Southwood County Park, based on the preferred construction methodology, it is expected that within Southwood Country Park SANG approximately 45 weeks of work will be required for the installation of the pipeline and reinstatement. This is set out in the table below:</p> <p>1.3 Reinstatement could be subject to seasonal constraints in relation to seeding and planting so the Applicant is proposing to limit construction works to two years.</p> <p>Estimated duration of works (based on working 6 days per week)</p> <table border="1" data-bbox="790 1090 1955 1437"> <thead> <tr> <th data-bbox="790 1090 1317 1134">Works</th> <th data-bbox="1317 1090 1955 1134">Estimated Duration</th> </tr> </thead> <tbody> <tr> <td data-bbox="790 1134 1317 1166">Enabling works, including compound (4AC)</td> <td data-bbox="1317 1134 1955 1166">4- 6 weeks,</td> </tr> <tr> <td data-bbox="790 1166 1317 1198">Mobilisation</td> <td data-bbox="1317 1166 1955 1198">3 weeks</td> </tr> <tr> <td data-bbox="790 1198 1317 1230">Open-cut</td> <td data-bbox="1317 1198 1955 1230">14 weeks</td> </tr> <tr> <td data-bbox="790 1230 1317 1262">TC014 (A327 Ively Road) auger bore</td> <td data-bbox="1317 1230 1955 1262">8 weeks</td> </tr> <tr> <td data-bbox="790 1262 1317 1294">TC014a (Flood Storage Dam) auger bore</td> <td data-bbox="1317 1262 1955 1294">8 weeks</td> </tr> <tr> <td data-bbox="790 1294 1317 1437">Reinstatement</td> <td data-bbox="1317 1294 1955 1437">4-6 weeks - Reinstatement will take into account seasonal constraints including tree planting seasonality and will occur in the first available planting season.</td> </tr> </tbody> </table>	Works	Estimated Duration	Enabling works, including compound (4AC)	4- 6 weeks,	Mobilisation	3 weeks	Open-cut	14 weeks	TC014 (A327 Ively Road) auger bore	8 weeks	TC014a (Flood Storage Dam) auger bore	8 weeks	Reinstatement	4-6 weeks - Reinstatement will take into account seasonal constraints including tree planting seasonality and will occur in the first available planting season.
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	<p>006b], the Applicant indicated that a similar time limit would be proposed for St Catherines Road SANG. Confirm whether this is still proposed, and why is two years required and how would this be secured.</p> <p>iii) If it would be occupied for a period of up to two years how can it be concluded that there would be no impact on the integrity of the TBH SPA? Provide evidence to support this conclusion.</p> <p>For Rushmoor Borough Council:</p> <p>Comment on whether the proposed two-year</p>	<p>1.4 In response to (ii), the Applicant has provided a Site Specific Plan for the construction works in the St Catherines Road SANG (Clewborough) (Document Reference 8.61). This says that the preferred construction methodology indicates that works within the SANG will take up to 13 months. This may not be 13 months of continuous work. The table below shows how this is calculated.</p> <p>Estimated duration of works (based on working 6 days per week)</p> <table border="1" data-bbox="792 647 1968 967"> <thead> <tr> <th>Works</th> <th>Estimated Duration</th> </tr> </thead> <tbody> <tr> <td>Enabling works</td> <td>2-3 weeks.</td> </tr> <tr> <td>Mobilisation</td> <td>3 weeks</td> </tr> <tr> <td>Open cut</td> <td>6 weeks,</td> </tr> <tr> <td>Construction compound</td> <td>32 weeks – supporting works within St Catherines Road</td> </tr> <tr> <td>Reinstatement</td> <td>4-6 weeks - Reinstatement of the SANG will take into account seasonal constraints and will occur in the first available planting season.</td> </tr> </tbody> </table> <p>1.5 However, the compound is required to support the complex streetworks in St Catherines Road and the less complex open cut trench in the SANG itself. Therefore, having regard to the complexity and risks associated with the streetworks it is prudent to commit to a two-year period for works in the SANG. In order to provide a robust assessment of the project's impacts, a worst-case scenario that construction works will take place over a two-year period has been assessed. The Applicant is applying the same time limit on all land within the SANGs. This is being achieved through amendments to the Code of Construction Practice (Document Reference 6.4 Appendix 16.1 (3)).</p> <p>1.6 In response to (iii), the two-year period for construction works underscores the basis for the conclusions reached in the HRA Report (Application Documents APP-130 and APP-131) and those conclusions can be found in paragraphs 5.8.8 to 5.8.29 of Application Document APP-130. In particular, having regard to the short duration of construction works, the limited extent of SANG affected directly by construction works in each case, the expected low levels of recreational</p>	Works	Estimated Duration	Enabling works	2-3 weeks.	Mobilisation	3 weeks	Open cut	6 weeks,	Construction compound	32 weeks – supporting works within St Catherines Road	Reinstatement	4-6 weeks - Reinstatement of the SANG will take into account seasonal constraints and will occur in the first available planting season.
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	<p>limit on construction works is acceptable.</p>	<p>displacement from SANGs and the proximity of those SANGs to alternative greenspace capable of acting as a receptor for any displaced recreational pressure for the short duration of temporary construction works, the HRA Report concludes that “... <i>any displacement of recreational activity to the SPA is expected to be very low</i>” (para 5.8.28) and “... <i>the displacement of recreational activities associated with the construction phase of the project would not lead to adverse effects on the integrity of the SPA or its ecological functions</i>” (para 5.8.29). These are robust conclusions and are endorsed by Natural England.</p>
<p>SANG 2.7</p>	<p>Provide a response to Surrey Heath Borough Council's D3 response [REP3-049] regarding St Catherines Road SANG and the effects on the TBH SPA with specific reference to the 5 questions posed by the Council in Paragraph 38.</p>	<p>1.1 Surrey Heath Borough Council questions from REP3-049, paragraph 38.</p> <p><u>Action 41 of the Issue Specific Hearing on Environmental Matters: Surrey Heath Borough Council's draft written questions 38.</u></p> <p><i>'In response to action 41 from the Issue Specific Hearing on Environmental Matters, the Council has drafted the following draft written questions with regards to the effect of the Proposed Development on the integrity and qualifying features of the Thames Basin Heaths Special Protection Area:'</i></p> <p>a) <i>'Can the applicant provide details of the assessment it undertook to consider alternatives to the St Catherines Road SANG construction compound?'</i></p> <p>1.7 The Applicant consulted on corridor options and selected a route within Corridor J close to the existing pipeline. The identification of construction compounds took place once the route was confirmed.</p> <p>1.8 The Applicant has identified a compound to serve the works on St Catherines Road and the SANG. The St Catherines SANG construction compound (CO-5C) would be set up and accessed from the south prior to the closure of St Catherines Road for the street works phase of the construction. This compound would also support the open trench construction for St Catherines Road SANG (Clewborough) itself. The location of the compound has been selected to avoid the need to remove mature trees, and to allow for the safe loading, unloading and movement of pipe</p>



ExQ2	Question:	Applicant response to Question:
		<p>without obstruction from overhanging mature tree branches. It is therefore on open ground close to the highway to allow for the delivery of materials and staff.</p> <p>1.9 Any compound located away from a highway would require the transfer of materials from road vehicles to off-road vehicles which would require space off the highway – of a similar size to the proposed compound – therefore a replacement compound elsewhere would not remove the need for a compound/access area in St Catherines Road SANG (Clewborough).</p> <p>1.10 There are existing pipelines running along the edge of Frith Hill woods in an easement which is also used as a public footpath (not a designated PRow) for access to Frith Hill. The location of the compound avoids conflict with this established access path into Frith Hill and additional impact on mature trees.</p> <p>1.11 It is therefore reasonable to say that there are no available alternatives that do not involve the removal of mature trees. The response to question b) addresses Frith Hill as an alternative in more detail.</p> <p>1.12 The other compounds would not be able to support the project in this area:</p> <ul style="list-style-type: none"> • A construction compound (CO-5A) is required to support the trenchless crossing of the Blackwater Valley; the only location with access to the road network is close to the entrance to SC Johnson. This compound would allow for the pipe to be delivered for both the stringing out of the pipe for the trenchless crossing and to support the open trench construction to the rear of Henley Drive. • The proposed construction compound (CO-5B) in Balmoral Drive is located on an area of open space and within a residential area with community facilities nearby, and serves the street works taking place in Balmoral Drive. There is a 3-4m elevation change between Balmoral Drive and St Catherines Road, the bank is heavily treed and these trees are protected by a Tree Preservation Order (TPO 6/75). Therefore, the project did not consider it preferable to propose serving the St Catherines Road work from the compound in Balmoral Drive because it would require the removal of mature protected trees, it would prolong the disruption to the residents of Balmoral Drive and the community facilities including local shops and Frimley Baptist Church



ExQ2	Question:	Applicant response to Question:
		<p>and hall. More details can be found in the Applicants response to Action 3 from the Issue Specific Hearing on 4 December 2019 (Document Reference 8.48)</p> <p>The proposed construction compound on the site of the previously proposed logistics hub at Deepcut (LH4) is located on MoD land (Crown Land) and therefore cannot be compulsorily secured. The MoD have indicated that this site would not be made available for the project due to competing military and commercial uses for the site. This compound if available would support construction activity within Frith Hill.</p> <ul style="list-style-type: none"> • The final construction compound in this area is on the other side of The Maultway and supports the construction activity alongside the Pirbright MoD ranges. <p>b) <i>‘Can the applicant explain why areas of Frith Hill could not be used as a construction compound?’</i></p> <p>1.13 Frith Hill is heavily treed, and it is a designated Site of Nature Conservation Interest. If the Applicant were to relocate the St Catherines SANG compound into Frith Hill woodland to serve the works in St Catherines Road and St Catherines Road SANG (Clewborough), it would require the removal of a substantial number of mature trees. It would also require the provision of an additional haul route to and from the compound for the delivery of materials, in addition to the haul road for the construction of the pipeline, to segregate compound traffic from construction traffic for health and safety reasons. The Applicant considered that these impacts and long-term harm are not justified when compared to the temporary, two-year impact on St Catherines Road SANG (Clewborough) where no mature trees would be removed and the function of the SANG as open space retained.</p> <p>1.14 To relocate the construction compound from St Catherines Road SANG (Clewborough) into Frith Hill, the Applicant would need to create a new access onto the highway for the delivery of pipe, materials and staff. There would need to be a location for the transfer of these materials and people from road vehicles to off-road vehicles, for the equipment to allow for the movement of the materials between vehicles and for the parking of these vehicles and equipment. The Applicant is proposing narrow working through the SANG and Frith Hill (NW20) to reduce the environmental</p>



ExQ2	Question:	Applicant response to Question:
		<p>impact of the proposed works in this location. To accommodate the works required to serve a relocated compound from St Catherines Road SANG (Clewborough) into Frith Hill would result in additional working width and duplicate rather than replace the proposed construction compound in St Catherines Road SANG (Clewborough), with an additional compound and the subsequent additional environmental impacts.</p> <p>c) <i>‘Can the applicant outline why it considers areas of land which are not currently SANGs constitute a ‘suitable alternative’ to impacted SANGs and capable of absorbing displaced recreational pressure and the evidence which supports this conclusion?’</i></p> <p>1.15 As set out in the response to question 2.9, SANG ‘capacity’ is calculated based on the number of homes built, compared to the area of mitigation. It is not based on the number of people who are actually using the SANG at any one time. It is important to recognise in this case that the St Catherines Road SANG (Clewborough) does not have a car park and is intended to serve the residents of the land immediately opposite. If one of these residents was to decide not to walk on the SANG because of the impact of the Applicant’s construction works, the likelihood is they would carry on into Frith Hill, which is in any event considerably larger, rather than get in their car and go somewhere else. The use of Frith Hill for local residents is encouraged by the provision of direct access from the SANG.</p> <p>1.16 There are footpath/bridleways linking St Catherines Road SANG (Clewborough) with public access land that meets the Council’s published criteria for the designation of a SANG immediately adjoining St Catherines Road SANG (Clewborough) within Frith Hill and open spaces for recreation including a newly designated bespoke SANG (Frimley Fuel Allotments SANG), see plan attached. Therefore, residents displaced from the SANG (from a relatively small total) are unlikely to travel to the SPA for recreation on foot and the Applicant has concluded that the level of displacement is not significant. It is important to remember that the development that this SANG serves is only 60 units and 27 of these are flats, so we are only considering a relatively small number of dwellings. Further, the area of the SANG which would be directly impacted by construction activity still allows for use of the SANG by local residents. In addition, there is public access land that meets the Council’s published criteria for the designation of a SANG immediately</p>

**Southampton to London Pipeline Project
 Response to the Examining Authority's Further Written Questions –
 Suitable Alternative Natural Greenspaces (SANG)**

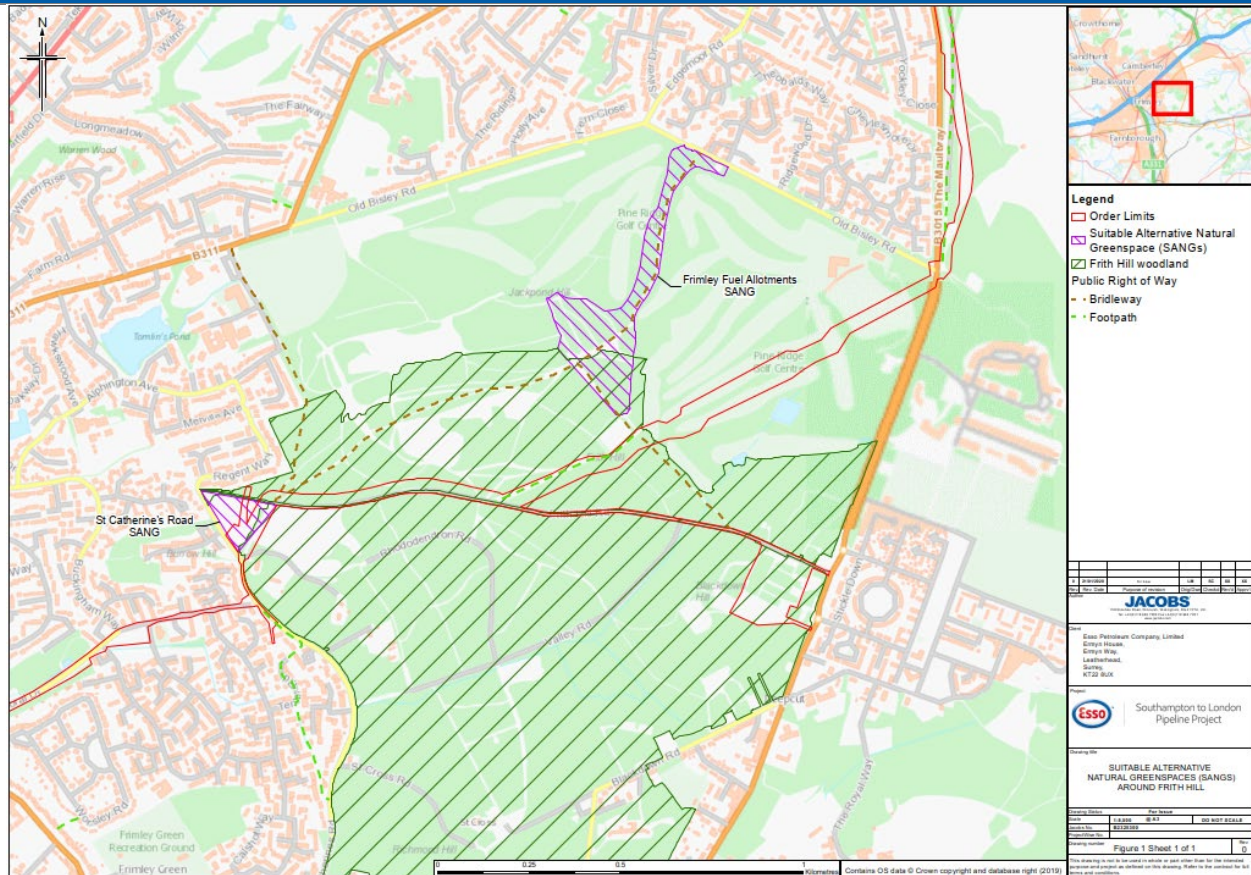


ExQ2	Question:	Applicant response to Question:
		<p>adjoining St Catherines Road SANG (Clewborough) within Frith Hill and the Frimley Fuel Allotments.</p> <p>1.17 In 2015, the Council approved the construction of 100 dwellings (Application References SU/14/0800 and SU/17/0581) on the site of the former Ridgewood Centre and these properties are under construction currently and not occupied. Part of the Pine Ridge Golf Course has been converted into SANG as mitigation for these new dwellings. This new SANG (Frimley Fuel Allotments SANG) opened in April 2019. This SANG is linked to Frith Hill and St Catherines Road SANG (Clewborough) by a public bridle way (PRoW 14 Camberley and Frimley). For the avoidance of doubt, the Applicant confirms that the application Order Limits do not interact with this SANG.</p>

**Southampton to London Pipeline Project
Response to the Examining Authority's Further Written Questions –
Suitable Alternative Natural Greenspaces (SANG)**



ExQ2	Question:	Applicant response to Question:
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1.18 The Applicant's response to Further Written Question SANG.2.9 explains the Applicant's understanding with regard to the Council's arguments on SANG capacity. It is important to note that SANG capacity in planning terms is a concept for the provision of new housing and not in relation to the number of people who can physically use the SANG at any one time. The Applicant understands that the development linked to the provision of St Catherines Road SANG (Clewborough) has been completed and occupied, and that this SANG cannot mitigate any further




ExQ2	Question:	Applicant response to Question:
		<p>housing development. This does not mean that, in practical terms, the SANG is 'full' and cannot accommodate either additional people from another area, or cope with a temporary reduction in available space. Indeed, the use of St Catherines Road SANG (Clewborough) is not exclusive to the residents of Keever Drive, nor are people unable to venture into Frith Hill or other linked open spaces and SANGs. Therefore, while the construction of the pipeline would reduce the area available within St Catherines Road SANG (Clewborough), it would not result in any loss of access to the adjoining spaces including the new Frimley Fuel Allotments SANG.</p> <p>1.19 The Applicant contends that residents looking for recreation opportunities in the Frimley area have extensive opportunities to enjoy open spaces, both SANG and non-SANG spaces, without needing to travel to use the Thames Basin Heaths SPA. The HRA Report (Application Documents APP-130 and APP-131) concludes that displacement to the SPA would be small scale and temporary as a worst-case assessment. In the case of St Catherines Road SANG (Clewborough), the availability of alternative open space for recreation is the more relevant factor and not whether it has a SANG designation.</p> <p>1.20 Again, the Applicant reiterates that its assessment and approach is accepted by Natural England.</p> <p>d) <i>'Can the applicant provide information as to whether there would be any direct habitat loss for ground nesting birds as a result of construction activities in the Thames Basin Heaths SPA? An appropriate assessment requires for there to be no potential for adverse impact on European Sites. If there is any loss of ground nesting bird habitat, can the applicant demonstrate why this would not result in the potential for adverse impact on site integrity? For example, in the case of the construction compound proposed to be sited on the Thames Basin Heaths SPA at Turf Hill.'</i></p> <p>1.21 The Applicant notes that reference is made by Surrey Heath to regulation 63(5) Conservation of Species and Habitats Regulations 2017. However, an appropriate assessment of the implications of a plan or project for a European site is only concerned with significant effects (regulation 63(1) Conservation of Species and Habitats Regulations 2017). It is therefore permissible to "screen out" from appropriate assessment effects which do not meet this threshold.</p> <p>1.22 The Habitats Regulations Assessment (HRA) Report acknowledges that construction works would affect habitat within the Thames Basin Heaths SPA – see, for example, p. 104 of the HRA where</p>



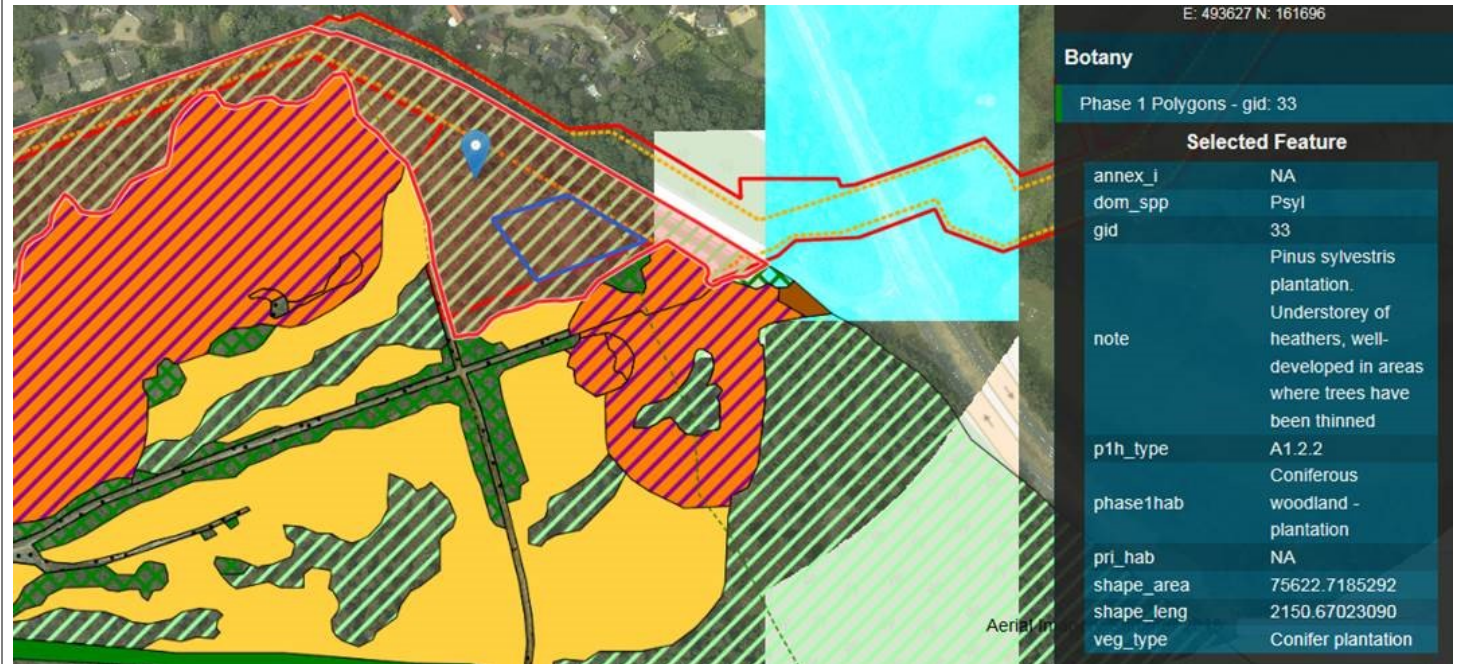
ExQ2	Question:	Applicant response to Question:
		<p>it is stated that “<i>construction of the pipeline within the Order Limits would require excavations and clearance of vegetation within the SPA</i>”.</p> <p>1.23 However, the HRA also finds that the maximum area of the SPA within the Order limits only accounts for 0.4% of the SPA’s total area. The effect on the SPA would also be a temporary one, during construction only. The effect is therefore both temporary and very limited in extent. As explained at p.104 of the HRA Report “<i>even in a hypothetical scenario during which the total 36.20ha area of SPA within the Order Limits were temporarily destroyed during construction, it is not anticipated that LSE would arise given the small area of the total SPA resource that would be affected</i>”.</p> <p>1.24 As noted, there would be no permanent impact on this part of the SPA and land affected would be restored to a condition appropriate to its previous use. During natural regeneration of the land, an approach which is supported by Natural England, habitat disturbed by the project would not be completely unsuitable for the qualifying species; whilst heathland may not have regenerated fully, qualifying species are still capable of utilising bare or developing substrate (p. 104 of the HRA).</p> <p>1.25 On that basis, the Applicant was entitled to conclude, as it did, that effects to the SPA via the pathway of habitat loss would be <i>de minimis</i> (p104) and could therefore be “screened out” from appropriate assessment and do not fall to be considered under regulation 63(5), as Surrey Heath’s submission implies.</p> <p>1.26 The conclusions which the Applicant has reached regarding effects to the SPA via direct habitat loss have been endorsed by Natural England.</p> <p>e) ‘<i>At the Issue Specific Hearing on Environmental Matters it was stated that the construction compound west of Guildford Road at Turf Hill did not include any heathland within its area. Can the applicant provide evidence for the area demonstrating that this is the case?</i>’</p> <p>1.27 The Applicant has reviewed what was said at the hearing on 3 December 2019 and the Applicant did not say the compound did not include any heathland. It said, ‘<i>the compound is primarily woodland</i>’. The Applicant will therefore respond to what was said rather than the comment made in e).</p>



ExQ2	Question:	Applicant response to Question:
		<p>1.28 The key points are that the compound was located away from the open, wetter, heathland to the south, and that the creation of the construction compound would result in the clearance of the woodland vegetation from this area, and once the works in Turf Hill are completed, the site would be cleared and left to naturally regenerate as additional heathland in line with the objectives of the Surrey Heath Turf Hill Management Plan 2015-2025.</p> <p>1.29 This location has been discussed in site meetings with representatives of Natural England, Surrey Wildlife Trust and Surrey Heath Borough Council and no concerns were raised.</p> <p>1.30 The evidence for the position of the Applicant can be found in the photograph below showing the location of the compound, and the extract below that from the phase one habitat survey identifying the site (blue edge) as a coniferous woodland plantation in the text on the right of the image.</p> <p>Photograph of Compound location west of Guilford Road</p> 



Extract from Phase one Habitat Survey





ExQ2	Question:	Applicant response to Question:
SANG 2.8	<p>Explain the circumstances in which the stringing area would need to be utilised in St. Catherines Road SANG.</p>	<p>1.1 The Applicant is currently not anticipating the stringing area being utilised in St Catherines Road SANG (Clewborough).</p> <p>1.2 The Applicant would prefer to use an open cut methodology and close St Catherines Road to the south during construction, therefore not requiring this stringing out area.</p> <p>1.3 However, the final decision on whether a trenchless technique will be necessary would be made once detailed design and pre-construction surveys have been completed. Installation in this area is complex due to the narrow working within the road, the topography, existing pipelines and other utility services, and the close proximity of residences requiring access. If the Applicant is unable to work in the road because of these factors, then these are the circumstances which would determine whether the stringing area would need to be utilised in St Catherines Road SANG (Clewborough). The option for a trenchless installation technique has been retained in the Order Limits because of this uncertainty.</p> <p>1.4 In the unlikely event it should be necessary to use a trenchless construction technique in St Catherines Road, this area would be necessary to lay pipe on the surface of the ground on rollers in preparation for pulling through the drill. The stringing out area would not be required for any other activity.</p> <p>1.5 If trenchless construction was necessary and the stringing area utilised, the area and duration of the construction would be reduced as it would not be supporting the open cut in St Catherines Road.</p>
SANG 2.9	<p>Explain why you consider areas of land which have full SANG capacity, such as Southwood Woodlands SANG, would be a “suitable alternative” to Southwood Country</p>	<p>1.1 The area around the Thames Basin Heath (TBH) SPA has experienced wide-scale housing in the last 50 years, with Natural England expressing concern that further large-scale development could increase recreational pressures on the TBH SPA area and its nesting birds reported in draft Delivery Plan (the “dDP”) Natural England, February 2005. The disturbance from recreational activities can have an adverse impact in various ways:</p> <ul style="list-style-type: none"> • through increased nest predation by natural predators when adults are flushed from the nest or deterred from returning to it by the presence of people or dogs;



ExQ2	Question:	Applicant response to Question:
	<p>Park SANG in absorbing displaced recreational pressure. Provide evidence to support this conclusion.</p>	<ul style="list-style-type: none"> • chicks or eggs dying of exposure because adults are kept away from the nest; • through accidental trampling of the eggs by people, given that the nest is on the ground and often close to footpaths; • through predation of chicks or eggs by domestic dogs and cats; and • increasing stress levels in adult birds. <p>1.2 The Surrey Heath Thames Basin Heaths Special Protection Area (TBH SPA) Avoidance Strategy Supplementary Planning Document 2019 states that <i>'Surrey Heath will provide SANGs for new developments at a standard of at least 8 hectares per 1,000 head of population as set out in the JSPB Delivery Framework. All SANGs, including on-site provision, will be expected as a minimum to meet the 8ha per 1,000 new population standard.'</i></p> <p>1.3 SANG "capacity" is, therefore, calculated based on the number of homes built compared to the area of mitigation SANG area available for community recreation use. It is not based on the number of people who are actually using the SANG at any one time and at capacity in terms of the number of people actively using the space at any one point in time.</p> <p>1.4 This means that even if the housing growth has been delivered up to the limit of the capacity for a specific SANG in planning policy terms, it does not mean that, during construction, people would be unable to use the temporarily affected SANG or a nearby SANG because it is at capacity. There is no restriction on any resident using a SANG, nor any bar to entering a SANG which is 'at capacity'. The term is simply an indication that the housing allocated in the area and mitigated by the provision of the SANG has been delivered.</p> <p>1.5 It is also relevant to note that only a small part of the SANG would be affected by construction works.</p> <p>1.6 This approach is supported by Natural England.</p>
<p>SANG 2.10</p>	<p>Explain how the impacts of construction activity would affect</p>	<p>1.1 The first phase of the Southwood Country Park SANG opened in September 2019.</p>



ExQ2	Question:	Applicant response to Question:
	<p>accessibility of Southwood Country Park and if it would how would this effect the capacity of the SANG i.e. would it be reduced?</p>	<p>1.2 The construction of the pipeline would not prevent access to any of the car parks serving Southwood SANG, nor would footpath access into the SANG be severed by the construction of the pipeline. The Applicant will ensure through commitments G114 and OP04 that circular paths will be retained – this is secured through the Code of Construction Practice (CoCP) (Document Reference 6.4 Appendix 16.1 (3)).</p> <p>1.3 Only a small part of the SANG would be affected by construction works. All the footpaths including the circular walks would remain operational during construction. No car parks would be impacted by construction. Therefore, the SANG would continue to function as effective mitigation for the current and proposed housing areas in this part of Farnborough.</p>
<p>SANG 2.11</p>	<p>Runnymede Borough Council have advised [REP3-035] that Chertsey Meads is now formally recognised by Natural England as a SANG for mitigating impact on the TBH SPA. Explain whether this affects any of the assumptions made in the ES and HRA report and do any of the application documents need to be updated to reflect the change in status of this area of open space.</p>	<p>1.1 The Applicant was aware of the likelihood that Chertsey Meads would become a SANG.</p> <p>1.2 As a result, Chertsey Meads was included in the Habitats Regulations Assessment Report as a SANG (Application Documents APP-130 and APP-131), see paragraph 5.8.10 (top of page 53) and paragraph 5.8.24 which is specifically about Chertsey Meads and notes that there are 10 alternative SANGs between Chertsey Meads and the SPA. The Applicant is satisfied that no adjustment needs to be made to the HRA Report given that it already considered the site as a SANG.</p> <p>1.3 SANGs were not specifically considered in the biodiversity chapter of the ES as they are not biodiversity receptors (see paragraph 7.2.20 of ES Chapter 7 (Application Document APP-047)). The Applicant is satisfied that the recognition of Chertsey Meads as a SANG does not therefore lead to a need to update the ES, the HRA or any other application documents.</p>



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